

An update from the ICGS

Overview

Through quarterly and annual reports, the ICGS shares data and analysis to ensure that the parliamentary community and our stakeholders can review our performance. In doing so, we demonstrate how we are progressing against our priorities of supporting service users; providing timely, quality investigations; and contributing to culture change in Parliament. The ICGS has previously followed an annual reporting cycle of July to June based on the Scheme having been established in July 2018. However, this was not aligned with the reporting cycles in both the House of Commons and the House of Lords. To remedy this, we are publishing this interim report, which covers from July 2023 until September 2024. We intend to publish our next full Annual Report in summer 2025. It will cover the period from July 2023 to March 2025.

Updates to our data

We recently completed an analysis of how we report on ICGS investigations. It is common practice for metrics to be reviewed and adjusted to ensure that they remain relevant, realistic and do not miss important insights. The purpose of this analysis was to put in place more rigorous data definitions and bring consistency to the way we measure investigations. The analysis identified some improvements needed in the existing metrics. Therefore, a change to how investigations are measured was implemented from 1 July 2023. Importantly, reinvestigations have been separated out from original investigations.

Some figures presented in this interim report include ICGS cases handled by the Lords Commissioners for Standards. It is the first time these figures have published collectively, giving greater insight into performance across the whole Scheme.

The ICGS is the first scheme of its kind in *any* legislature. Operating in a complex, political environment, it provides over 15,000 people with a well-established route to receive trauma-informed support and to also have complaints of bullying, harassment and sexual misconduct investigated independently, thoroughly, and fairly.

In the third independent review of the ICGS, published this year, Paul Kernaghan CBE QPM observed that;

“The Scheme is making a difference, and has demonstrated its ability to hold people to account for unacceptable behaviour. The parliamentary community should take pride in the work and achievements of the ICGS to date.”

Our ambition is for the ICGS to be the gold standard in workplace investigations. And so, alongside implementing the recommendations delivered by the review, we are already delivering on a programme of targeted improvements which aim to further ensure that all investigations are completed to a high standard, as quickly as possible. We also managed and minimised disruption and put in place support for service users during the general election. The most significant improvements are:

Better investigations

- A second investigator is now assigned to all cases. This follows investigative best practice. It enables investigators to conduct joint interviews, provide peer support, and improve task allocation, adding greater resilience to the process.
- New data sharing arrangements and updated contracts allow the ICGS team to assess evidence as it soon as it is collected, rather than only at the end of an investigation. This allows us to identify, discuss and remedy issues in real time.
- As they review investigations, the ICGS team now receives richer information through a new investigation log where all communications and decisions are recorded, providing a clear audit trail.
- In June, we started a pilot of a centrally contracted transcript service to support investigators. This frees up investigators time to focus on the investigation and ensures all interviews are recorded to the same high standard.
- This autumn we introduced a new case review process. This will provide the ICGS team greater assurance over investigators’ work, by identifying and addressing concerns in real time and spotlighting cases which require additional attention to deliver on time.
- We developed and implemented a new template to support independent investigators when writing the investigation report. It aims to provides clarity, structure, and consistency across every report.

A skilled and high-performing team

- We enhanced the skillset and experience in our team by recruiting to three new roles:
 - A Policy, Procedures and Guidance Advisor. This role is to act in quick time on policy issues arising in cases and create internal policy and guidance to enhance consistency and quality.
 - A Data and Analysis Lead. They will improve data collection, management, and reporting to provide insight and enable data-guided decision making.
 - A Senior Operations Manager. To oversee all investigative and operational work and be responsible for the new case review process, including ensuring that staff are trained and supported and that assurance tools are properly in place for all stages of a case.
- We are making better use of the data we collect about our cases. Analysis of this data gives us a better understanding of the impact of our decisions. It is also helping us to monitor the effectiveness of the changes we have implemented.
- We held two Keeping In Touch Days with independent investigators. The purpose of these days is to give investigators a forum to raise and discuss procedural queries, to share best practice, and to share learning from their investigations.
- All ICGS staff have completed trauma informed training. This ensures that our processes put the wellbeing of our service users first and allows them to engage more effectively through improved accessibility and a better experience of our services.

Wrap-around support

- Work on the procurement of a new helpline provider began early 2024 in preparation for the contract with Victim Support expiring on 30 September 2024. Following a thorough public procurement process, the contract was awarded to Victim Support in July 2024. Since then, we have worked on the development of a new Helpline case management system (CMS) for use under the new contractual arrangements. The introduction of the new CMS will give us increased oversight of ICGS calls handled by Victim Support staff and enable us to quality assure the service being delivered.
- In March 2024, we launched Information Sessions to increase access to the ICGS. They are confidential sessions with experienced members of the ICGS team that aim to provide information about ICGS processes, explain what happens when a complaint is made, and enable people to talk through the range of options and support available to them.
- We published several new accessible guides for service users including our first guide for trusted supporters and revisions of our guides for witnesses and on the Facilitating Multiple Complaints process.
- Working with the decision-making bodies in the Scheme, we conducted an end-to-end service use review of our processes to highlight areas we can help make them more trauma informed.

Responding to the general election

- In Spring, the ICGS team created a general election plan, outlining a communications plan, package of service user support, and case-specific mitigations to manage delays. All service users were contacted individually, with information tailored to their case about the impact of the election, within 48 hours of the election being called.
- We produced guidance for both the ICGS team and independent investigators following the dissolution of Parliament to support the continuity of investigations pre- and post-general election.
- Our Director and Deputy Director delivered key messages to new Members in-person, during their induction sessions. Members heard from an expert panel from across Parliament's standards landscape where we discussed our expectations of behaviour and how Members can positively impact culture. The ICGS presentation focussed on the Behaviour Code, the importance of role-modelling behaviour in Parliament and encouraged Members to attend the Behaviour Code seminars.
- Members of the ICGS team were encouraged to act as buddies to new Members, to promote engagement with and understanding of the Scheme.

Delivering Paul Kernaghan's independent review

- The independent review of the ICGS contained 26 recommendations. As of October, 16 are currently in progress, one has been delivered and work has not yet started on nine of the recommendations.
- The sequencing is important. Key recommendations regarding governance and policy require a decision on the floor of the House of Commons. Many of the remaining recommendations are dependent on their approval. The impact of the election on the parliamentary calendar has proved a challenge for progressing these at pace. However, the ICGS team still has ambitions to have completed the majority of the recommendations completed within a year of publication of the review, by May 2025.
- We hope that the recommendations will enable us to make some changes to processes that help speed up investigations further, but also help support service users better.

Listening to our stakeholders

- We launched our first stakeholder survey in July 2024. Feedback received will help us understand the views of ICGS Stakeholders and identify key areas of focus for how we can support both our stakeholders and service users better.

ICGS data

We have three priorities for our service:

- Priority 1:** Supporting our service users and potential complainants
- Priority 2:** Delivering independent, high-quality, and timely assessments and investigations
- Priority 3:** Working with others to improve Parliament's working culture

We set out below our performance against those priorities:

Priority 1: Supporting our service users and potential complainants

Calls to the ICGS Helpline

The ICGS Helpline acts as a gateway to the ICGS and is available to everyone who works at or visits Parliament. The Helpline is delivered by Victim Support, which is independent of Parliament and the political parties.

- The Helpline was contacted 437 times between 1 July 2023 and 30 September 2024. These contacts were made by 265 individuals.
- Of 170 calls that fell within the ICGS's remit, most were from people wishing to talk about their own experience (71%) and people who were seeking advice or information (24%). Almost 5% of calls came from managers and colleagues who were supporting someone and less than 1% of contacts came from respondents.

Sexual misconduct services: Independent Sexual Misconduct Advisors and Pathway 2

The Helpline offers an Independent Sexual Misconduct Advisor (ISMA) to all complainants reporting sexual misconduct.

- Between 1 July 2023 and 30 September 2024, six service users received dedicated ISMA support. This includes three cases that were initially referred before 1 July 2023 and continued to receive ISMA support.

Pathway 2 is an informal resolution route for complainants reporting sexual misconduct.

- This reporting period, no cases were informally resolved through Pathway 2.

Wellbeing support provided by the ICGS

Our Engagement Manager plays a key role in supporting both complainants and those complained about.

- Over the past 15 months, our Engagement Manager has been in contact with over 100 complainants and respondents on more than 510 occasions.

Priority 2: Delivering independent, high quality, and timely assessments and investigations

Disclosures made and cases opened

If a service user wishes to make a formal complaint the Helpline gathers information about the disclosure and sends it to the ICGS team. In cases involving Members of the House of Lords or their staff, complainants can also choose to complain directly to the Commissioners for Standards. For cases received by the ICGS team¹, a case file is opened for each person complained about in the disclosure.

- Between 1 July 2023 and 30 September 2024, 53 disclosures were made to the ICGS.
- The majority of disclosures were made by staff of both House Administrations and the Parliamentary Digital Service (51%), and MPs' staff (26%). 6% of disclosures were made by Peers and 4% by MPs. The remaining 13% of disclosures were made by visitors to the parliamentary estate and other members of the parliamentary community.
- 70 cases were opened:
 - 67 were complaints made under the [Bullying and Harassment Policy](#)
 - Three were complaints made under the [Sexual Misconduct Policy](#).

Initial assessments

The initial assessment² determines whether a complaint meets the criteria to be investigated under the ICGS as set out in the Bullying and Harassment and Sexual Misconduct policies and procedures.

- Between 1 July 2023 and 30 September 2024, 40 initial assessments were completed.
- These assessments took an average of almost nine weeks (43 working days) to complete. This is broadly similar to the average of 40 working days for 36 initial assessments, as reported in the 2022-23 Annual Report.
- Of the 40 initial assessments completed, 45% (18) were determined to have met the criteria and could therefore progress to full assessment. The remaining 22 cases did not meet the criteria for a full investigation.

Full assessments

A complaint that meets the criteria for a full assessment is investigated by an independent investigator. After the investigator has completed their investigation and made a recommendation on whether or not the complaint should be upheld, the

¹ All cases except those initiated by the Lords Commissioners.

² Figures exclude Lords Commissioners for Standards' preliminary assessments. For disclosures made to the Lords Commissioners for Standards about Members of the House of Lords or their staff, the Commissioner will make a preliminary assessment of the complaint, to determine whether the complaint falls within the scope of the Lords Code of Conduct and whether there is *prima facie* evidence of a breach of the Code. If it passes this assessment, the Commissioner will launch an investigation. The Lords Code of Conduct uses the same definitions of bullying, harassment and sexual misconduct as the ICGS.

investigation report is sent to the decision-making body (DMB) for a decision, and, if relevant, sanction.

- Independent investigators completed nine full assessment investigations.
- These investigations took an average of seven months (153 working days) to complete. This is 31 days faster than the average of 184 working days for 16 investigations, as reported in the 2022-23 Annual Report. (See note 'Updates to our data' on page one about changes to how investigations are measured).
- The investigator's recommendation to the relevant DMB in a third of cases (three out of nine) was to uphold the complaint.

Re-investigations

There can be occasions when further work is required and the case is re-allocated to a different investigator. In some cases, it could result in re-investigation of the complaint in part or in full.

- Two re-investigations were completed between July 2023 and September 2024. They took an average of seven months (148 working days) to complete.

Investigations by the Lords Commissioners for Standards³

Complaints of bullying, harassment and sexual misconduct made against Members of the House of Lords and their staff are investigated by the Lords Commissioners for Standards.

- Between July 2023 and September 2024, the Commissioners concluded three complaints by investigation. Two were upheld.
- The investigations into these complaints took, on average, just under five months (100 working days) to conclude.

Informally resolved complaints

Some cases can be resolved through informal resolution (ICGS cases) or agreed resolution (Lords Commission for Standards cases).

- Two complaints were successfully resolved through informal resolution.
- In addition, the House of Lords Commissioners' concluded two cases by agreed resolution.

Withdrawn complaints

A complainant may decide at any time before the factual accuracy check stage that they wish to withdraw their complaint.

- 13 complaints were withdrawn. Most were withdrawn before completion of the initial assessment. Two were withdrawn at the full assessment stage.

³ Investigations completed by the Lords Commissioners for Standards are reported separately due to different counting rules and calculations used when measuring the length of an investigation.

- Reasons for withdrawal included: there being no specific complaint about an individual's behaviour; the complainant choosing to use another route to make their complaint; and feeling unable to continue with their complaint.

Open cases

As of 30 September 2024, 24 cases were open with the ICGS. Ten of the 24 open cases were at the initial assessment stage and nine were at full assessment stage. Of the remaining five open cases, three reports were with the complainants and respondents for a factual accuracy check and two cases were paused.

Priority 3: Working with others to improve Parliament's culture

Behaviour Code seminars

- Parliament's Behaviour Code seminar explores the Behaviour Code and the part staff and Members play in fostering a respectful and professional workplace culture across Parliament.
- Between 1 July 2023 and 30 September 2024, a total of 1,769 members of the parliamentary community attended seminars.
- To date, 99% (347 out of 350) of new MPs have attended the seminar. 98% (635 out of 650) of all MPs new and returning have now attended either the Behaviour Code Seminar or its predecessor, Valuing Everyone training.
- 81% of attendees provided feedback.
 - 99% said the seminar increased their awareness of key elements of the Behaviour Code
 - 99% said the seminar encouraged them to reflect on the role they play in building a respectful culture
 - 99% said the seminar effectively signposted support services and sources of help
 - 94% said the seminar increased their confidence in calling out unacceptable behaviour.

Outreach

Our outreach programme and events help us to connect with members of the parliamentary community to raise awareness of the ICGS and Behaviour Code.

- Since July 2023, we have delivered over 64 outreach events reaching almost 4,000 people across Parliament.