



Independent
Complaints
and Grievance
Scheme

Annual Report

July 2020 – June 2021

parliament.uk

Edition 2021

“The Scheme is a sophisticated workplace one with two sets of separate independent expert providers in the ICGS Helpline and the Independent Investigators services.

Its effective implementation and operation is a substantial achievement in the complex organisational context of Parliament.”

- Alison Stanley CBE FCIPD

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FOREWORD

This is my second Annual Report as Director of the Independent Complaints and Grievance Scheme (ICGS) and covers the year from 1 July 2020 to 30 June 2021. In last year's Annual Report, I wrote that Parliament had undergone one of the most extraordinary years in recent history. This year has continued in a similar way, with many of us dealing with challenges that the pandemic has brought to our work and our personal lives.

In the past 12 months, the ICGS has gone through significant changes of its own. I welcomed the comprehensive and constructive independent review of the ICGS, carried out by Alison Stanley CBE. While acknowledging the huge achievements of the ICGS, Alison Stanley also put forward 36 recommendations, 33 of which were accepted by the two Houses. Key recommendations included simplifying and improving the operation of ICGS cases, setting up the governance of the ICGS, restructuring the team and improving the ICGS policies and procedures. We have already implemented 25 recommendations and those changes will ensure a more inclusive, accessible scheme and a faster, more equitable process for investigating cases. We now have a new ICGS Hub on the parliamentary intranet, which has made the Scheme more accessible for the parliamentary community. I have recently appointed a new ICGS Deputy Director, who is leading on the operational side of the Scheme, and I am currently restructuring the ICGS team, ensuring that roles are aligned to responsibilities, which in turn will mean a speedier, more efficient, more consistent service to all members of the parliamentary community.

Another significant change was the Independent Expert Panel starting its work on considering appeals and sanctions of ICGS cases involving Members of Parliament, once the ICGS process is complete. The panel is entirely independent, with no MPs taking part in its decisions. To date, they have published six reports, concerning both current and former MPs.

The ICGS team and I are continually seeking to improve the Scheme for all users. Our improvements will mean a speedier and more efficient service. Next year will bring a new ICGS team structure, another procurement of the investigation services and a refresh of the Valuing Everyone training. I am confident that the ICGS will continue to play its significant role in both tackling unacceptable behaviour in Parliament and working towards building constructive working relationships between all members of the parliamentary community, working as colleagues together with mutual dignity and respect.

The Scheme is the first of its kind in any Parliament around the world and other legislatures are reaching out to the UK for guidance and best practice to help them shape their own schemes. I would like to thank all stakeholders for their continued support of the ICGS and their suggestions for making improvements. Please keep those suggestions coming.

As ever, I thank my team for their resilience and hard work during this significant year of change for the ICGS.

The ICGS is there for all of us. Please use it.

Jo Willows, Director, Independent Complaints and Grievance Scheme

1. Key Developments

At a glance

1. In this reporting year (July 2020-June 2021), 388 people contacted the Helpline, either by phone or by email, which compares with 293 people contacting the Helplines during the previous reporting year and 285 during the first year of the ICGS, 2018-19. Those 388 people made contact a total of 760 times, receiving information and support in a safe, confidential environment.
2. There were 48 investigations completed this year (the highest number of investigations completed since the Scheme began), 11 of which were started and completed during this reporting period and 37 of which were cases carried over from the proceeding years. Of these 46% were upheld, and 54% were not upheld.
3. During this reporting year, 45 cases were started, with 42 progressing to an initial assessment and 38 progressing to a full assessment. 34 cases were ongoing as of July 2021.

Key developments and milestones of the ICGS or connected with the work of the ICGS over this reporting year are as follows:

- For the first time (in line with Dame Laura Cox's third recommendation) the process for determining complaints of bullying, harassment and sexual misconduct against MPs is now independent, with MPs taking no part in the process. In June 2020, MPs approved motions to establish an Independent Expert Panel (IEP) with the power to determine sanctions in cases involving MPs. Recruitment for members of the IEP concluded in November 2020 and the Panel started hearing cases in early 2021. This has been a significant step forward and, to date, [six reports](#) have been published;
- The independent House of Lords Commissioner for Standards [reported](#) on seven cases during the reporting period under the relevant provisions of the [Code of Conduct](#) for Members of the Lords.
- We have expanded our pool of independent investigators;
- Of the 36 recommendations from Alison Stanley's 18-month review of the ICGS, published in February 2021, both Houses accepted 33 of the recommendations.¹ To date, 25 have been implemented.

¹ [Independent Complaints & Grievance Scheme: Independent 18-month review](#), Alison Stanley CBE FCIP, 22 February 2021. The three that were not accepted were recommendations 27, 28 and 30—making Valuing Everyone training compulsory for MPs, future MPs and MPs' staff.

- Completion of feedback on the training from participants continues to be high. For the face-to-face workshops, over 97% of participants (approximately 3,000) completed evaluation forms. For the online workshops, the completion rate is 80.07% (approximately 2,000). These high completion rates continue to be a positive sign of participants' willingness to engage with the training and provide evidence that the training is meeting its objectives.
 - Over 6,000 members of the parliamentary community have completed the Valuing Everyone course. During the reporting year, considerable progress was made in extending the training to Members and staff of both Houses, with completion rates now approaching 100% in those groups.
 - The House of Lords agreed to make the course mandatory for Members of the House under the terms of the [Code of Conduct](#). Members of the House who failed to complete the course within the stated deadline were referred to the Lords Commissioner for Standards, with the majority of those then completing the course as 'remedial action' and two Members ultimately subject to sanctions (losing access to certain facilities of the House) until they had completed the course.
- A number of changes have been made to make the ICGS more accessible, which will ensure that all members of the Parliamentary Community can more easily access our services. These include:
 - the launch of our new ICGS Hub on the parliamentary intranet, which has simplified versions of the complainant and respondent user guides, the revised policies and procedures and other related documents, using clear language;
 - new videos, offering a more accessible way to find out about the ICGS process, which will soon be available on the ICGS Hub; and
 - the Helpline's flexible approach to reasonable adjustments.

2. The operating context of the ICGS

Background

4. The ICGS was established as a cross-party, bicameral initiative, by Resolution of the House of Commons on 19 July 2018. The House of Commons (including MPs, MPs' staff and staff from the House Administration), the Parliamentary Digital Services (PDS) and third-party passholders were covered by the Scheme, for incidents that happened from June 2017 onwards. House of Lords Administration staff were included in the Scheme in November 2018, with Members of the House of Lords and their staff included from May 2019. In October 2019, the Scheme was further extended to complaints dating back to any time before June 2017 and to any former members of the parliamentary community, including those who had left Parliament since June 2017.
5. In April 2021, both Houses approved textual changes to the policies and procedures concerning complaints of bullying, harassment or sexual misconduct, in response to Alison Stanley's report. They also approved other clarification changes.
6. The ICGS consists of:
 - A Behaviour Code, which clearly sets out the behaviour expected of all members of the parliamentary community;
 - An independent bullying, harassment and sexual misconduct Helpline and an independent sexual misconduct advisory (ISMA) service, provided by Victim Support;
 - The Bullying and Harassment policy and procedure;
 - The Sexual Misconduct policy and procedure;
 - Independent investigators provided by three investigation service providers, and independent investigators (recruited to investigate non-recent and current complex cases);
 - A Parliament-wide training programme, "Valuing Everyone", delivered by Challenge consultancy; and
 - Provisions in the Codes of Conduct for Lords Members and their staff, which mean that bullying, harassment and sexual misconduct constitute a breach of the Codes.

The ICGS bicameral team and Memorandum of Understanding

7. The bicameral ICGS team sits independently of any other team in the House of Commons or the House of Lords, following the implementation of Alison Stanley's recommendation in her 6-month review that the ICGS team should become bicameral and be independent of any HR function.² A joint ICGS Memorandum of Understanding—setting out the financial, HR and governance arrangements for the bicameral ICGS team—was agreed by the two House Administrations in March 2020.³

Financial information

8. The ICGS is a demand-led scheme and there are no limits set on the number of investigations that can be carried out. Although there are now guidelines on the time an investigation takes, some investigations are more complex than others and therefore take more time to investigate, which in turn are more expensive.
9. In response to Alison Stanley's recommendation from her 6-month review—a strengthened, independent ICGS team—the team expanded in size and in skillset, with new expertise brought in with experience in HR, casework, inclusion, improvement and innovation.
10. During 2020, two procurement exercises were carried out, one for a new three-year contract for the Helpline and for a new three-year contract for investigator service providers.
11. The following figures highlight the total spend for each financial year, including external services (the Helpline, independent investigators and Valuing Everyone training) and staffing costs:
 - **for financial year 2020/21 (April 2020 to March 2021)** the total spend for ICGS was £1,951,482 and by each House as follows: House of Commons £1,381,918, and House of Lords £569,564;
 - **for the current financial year 2021/22 (April 2021 to March 2022)** the total budget is £1,939,978 and by each House as follows: House of Commons £1,401,536, and House of Lords £538,442.

² [Independent 6-month review: UK Parliament Independent Complaints & Grievance Scheme](#), Alison Stanley CBE FCIPD, 31 May 2019, Recommendation 2, paragraph 49

³ [Independent Complaints & Grievance Scheme Annual Report \(July 2019 – July 2020\)](#), Memorandum of Understanding, Annex B, p 41.

Procurement

Helpline

12. The contracts for the original Helpline service providers came to an end in July 2020.
13. Victim Support was the successful bidder for the Helpline service and took over the operation from 3 July 2020, bringing the two separate Helplines—one for bullying and harassment and one for sexual misconduct—into one streamlined service. As part of their contract, Victim Support also delivers the Independent Sexual Misconduct Advisor (ISMA) service, which provides face-to-face support throughout the ICGS process for those contacting the Helpline about sexual misconduct.
14. The procurement process was rigorous, and Victim Support successfully demonstrated to the panel that they had the enhanced specialist experience needed to deliver this organisation-wide service.

Independent investigator providers

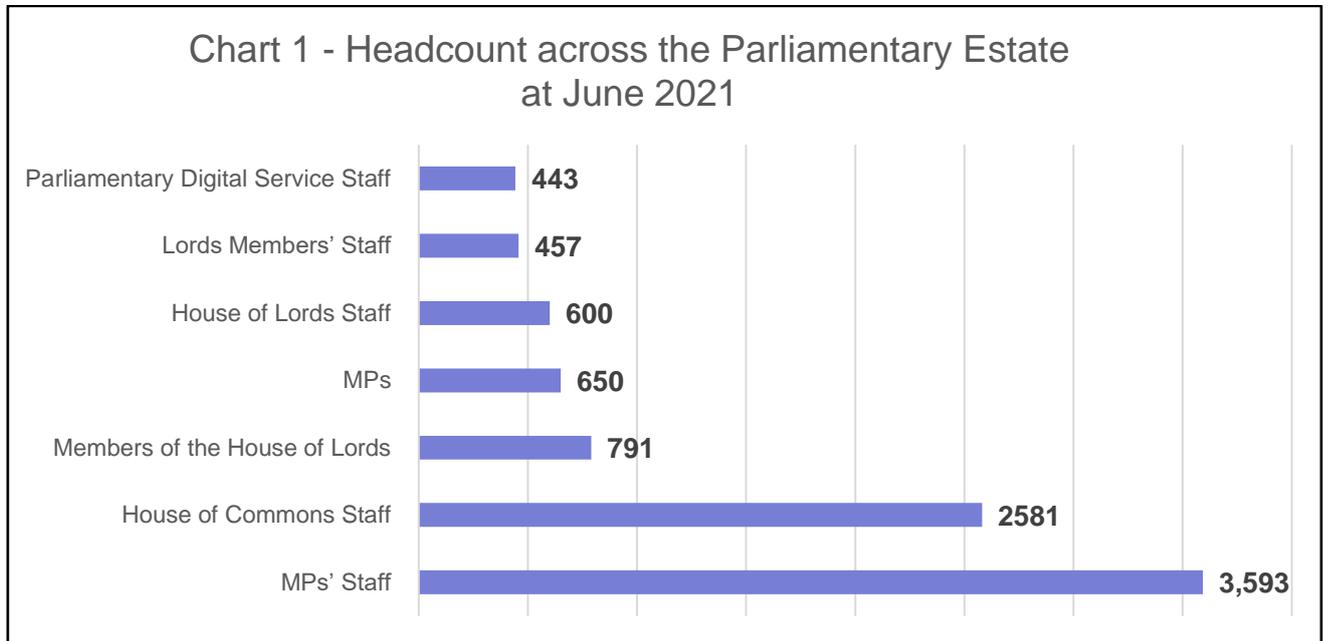
15. In July 2020, work commenced on a competitive tendering exercise to contract independent investigation providers to carry out investigations of complaints. A robust procurement process was carried out and in September 2020, three specialist providers were successful: CMP Solutions; the TCM Group (TCM); and EA Inclusion.

The parliamentary community

16. The parliamentary community is a large and diverse group of people, comprising of Members of both the House of Commons and House of Lords, their staff, staff in both the House of Commons and House of Lords Administrations, Parliamentary Digital Services (PDS) staff, as well as contractors, constituency office staff and visitors to the Parliamentary Estate. There are six Workplace Equality Networks (WENs), ParliABLE, ParliCARE, ParliGENDER, ParliON, ParliOUT, and ParliREACH.⁴

⁴ [Workplace Equality Networks - UK Parliament](#)

17. Chart 1 shows the headcount across the parliamentary estate as at June 2021 and highlights the different sizes of the largest groups in the parliamentary community:



Diversity, Inclusion and Accessibility

18. The ICGS is committed to equal opportunities. The Terms of Reference of the 18-month review of the ICGS included 'the extent to which diversity and inclusion is embedded in the Scheme' and Alison Stanley made specific recommendations to improve the accessibility of the ICGS, all of which were prioritised by the ICGS team and were implemented in May 2021.

Helpline

19. The ICGS Helpline ensures that no person receives less favourable treatment on the grounds of their age, disability (including mental health), gender identity, gender expression, trans status, marriage or civil partnership status, pregnancy or maternity, race, colour, ethnic origin, religion or belief, sex or sexual orientation. The Helpline offers a wide range of reasonable adjustments to disabled colleagues, including live video captioning. To support non desk-based staff and those working flexible hours, anyone wanting to talk to someone from the Helpline outside of the standard working hours can arrange to do so. They support all requests for reasonable adjustments.

Data

20. We updated our Diversity and Inclusion (D&I) questions to reflect best practice, which will be asked at two key points in the Scheme. The ICGS team analyses trends in the Diversity and Inclusion data, taking appropriate action where necessary.

21. Specific examples are included in the updated policies, which highlight intersecting identities.

Investigations

22. The ICGS template documents now clearly promote discussions about reasonable adjustments between investigators and users at the start of any investigation.

Communications

23. The ICGS team launched its new visual identity. It uses visual elements and communications best practice to support neurodiverse colleagues and those with a visual impairment. The ICGS Hub presents information about the ICGS in a clear accessible format. The Hub offers colleagues the ability to read ICGS guidance in a plain text format or have it read aloud, using an immersive reader.

Engagement

24. The ICGS Team has held Outreach sessions with the Parliamentary Workplace Networks to promote the Helpline as a means of support and advice. The ICGS team has presented to colleagues working for MPs and colleagues working for Select Committees, Digital Services, HR colleagues, In House Services and Estates, and other groups across the parliamentary estate.

Communications and Outreach

25. Despite restrictions that the pandemic placed on communications with colleagues, the ICGS team—with invaluable support from the House of Commons and House of Lords Communications Teams—have implemented a communications plan to reach and engage with the different groups that make up the parliamentary community. This significant initiative was recognised by Alison Stanley in her 18-month review of the ICGS:

The high levels of awareness of the Scheme across the Parliamentary Community, particularly amongst non-desk based staff, many of whom have been working on site during the pandemic, and MPs' staff, many working alone at home during the same period, demonstrates the success of all the hard work on communications.⁵

26. Members of the parliamentary community, and the wider public, received different communications promoting the ICGS, through a range of channels including:

- All-staff emails and newsletters;
- Posters, leaflets and cards placed in prominent positions, including in the new Victoria Street offices;

⁵ [Independent Complaints & Grievance Scheme: Independent 18-month review](#), Alison Stanley CBE FCIP, 22 February 2021, para 216.

- 'Our Voice' and 'Our Culture' publications, which target non desk-based staff groups;
- News stories on the Parliamentary intranet home page;
- The Parliamentary public-facing internet site;
- The House of Commons 'Everyone has a Voice' SharePoint site;
- Our new ICGS SharePoint Hub;
- Training sessions;
- Hard copy resources sent out to advertise the new Helpline in Summer 2020;
- Workplace Equality Networks;
- Outreach sessions targeting hard-to-reach staff groups including MPs staff;
- Editorials and articles in the [House Magazine](#) and external publications; and
- An editorial by Director Jo Willows in [The Times](#)

27. In June 2021, the new ICGS Hub was launched, with the aim of making the Scheme more accessible for different groups of people with Parliament, by providing clear and simple guidance in one place. On the Hub, users can access:

- Information about the ICGS Helpline and how to contact it;
- Guidance on each step of the process;
- The latest quarterly statistics, including statistics on calls to the Helpline and complaints made;
- Information on the full range of additional support services available; and
- The policies and procedures of the ICGS.

3. Valuing Everyone training

Introduction

28. The Valuing Everyone training was procured by the House of Commons Learning and Organisational Development Team (L&OD) in December 2018 and has been delivered by Challenge Consultancy since that time. It is a mandatory requirement for staff of both Houses and Members of the House of Lords and is offered widely to all members of the parliamentary community.
29. The training continues to be a core part of the ICGS. It has been designed to help Members of both Houses, those Members' staff and staff of both Houses to understand, recognise and prevent bullying, harassment and sexual misconduct and to give them the tools to question such inappropriate behaviour. The training also promotes the range of services and support available to participants. A course booklet has been designed to accompany the training.

Who has completed the training?

30. To date, over 6,000 people have completed the training since it was launched in 2019. Attendees know that everyone attending the training is being shown the same material and given the same messages, with the only variation being the case studies discussed, which are contextualised according to whether the audience is made up of Members, Members' staff, staff of either House, or managers with responsibility for employing staff. From June 2019 to March 2020, the training was offered as a face-to-face workshop, for up to 14 participants. Since 20 March 2020, with the introduction of remote working and restrictions as a result of Covid-19, the training has been offered as an online workshop, for up to 20 participants.

31. The breakdown of participants by role within the parliamentary community is set out in the table below:

Participants	Completed	Booked	Total	Total in group	Percentage who have attended/booked
House of Commons staff	2,440	52	2,492	2,581	97%
House of Lords staff	586	9	595	600	99%
Parliamentary Digital Service staff	433	5	438	443	99%
MPs	597	4	601	650	92%
MPs' staff	745	18	763	3,593	21%
Members of the House of Lords	769	7	776	791	98%
Lords Members' staff	11	0	11	457	2%

As of 30 June 2021

32. The high participation rates achieved for staff and Members of both Houses represent significant progress during this reporting year. They follow significant efforts to engage successfully with the different groups within the parliamentary community and ensuring that groups of staff who do not routinely use IT in their role were able to access the online workshops during the pandemic.⁶

33. Figures for MPs' staff and Lords Members' staff are lower, which reflects the different contexts and working arrangements for these groups. MPs' staff are employed directly by their MP and currently it is not a mandatory requirement for MPs' staff to complete the training. This group is also subject to a relatively large amount of turnover and relatively short-term contracts. There has been more active engagement with MPs' staff than ever before. Through regular presentations, both the Members Service Team (MST) and the ICGS team continue to encourage MPs' staff to attend the training.

34. Lords Members' staff are, in the majority of cases, not employees of the Member who sponsors their parliamentary access and many are employed by other organisations. They vary in the extent to which they engage with parliamentary work, with some carrying out parliamentary work sporadically and without visiting the parliamentary estate. For these reasons, during this reporting year, priority has been given to providing training to Lords Members and staff of the Lords Administration. The Lords Administration has begun more formal engagement with Lords Members' staff to encourage more people to attend the training.

⁶ It may never be possible to report 100% completion for some groups, for example as a result of staff turnover, or staff on long-term leave or career breaks.

35. In November 2020, the House of Lords agreed that the training should be mandatory for Members of the House and that Members who had not completed or booked to complete the training by 1 April 2021 would be in breach of the Code of Conduct.⁷ Members who failed to meet this deadline were referred to the House of Lords Commissioner for Standards for investigation, under the terms of the Code. As a result, 47 Members were required to complete the training as 'remedial action'.⁸ The cases of another four Members could not be resolved by remedial action and were considered separately, with formal sanctions (withdrawing access to certain services and facilities of the House until they had completed the course) ultimately being applied to two Members.⁹

Feedback

36. Completion of feedback on the training from participants continues to be high. For the face-to-face workshops, over 97% of participants (approximately 3,000) completed evaluation forms. For the online workshops, the completion rate is 80.07% (approximately 2,000). These high completion rates continue to be a positive sign of participants' willingness to engage with the training and provide evidence that the training is meeting its objectives.

37. Headline findings from the evaluation forms¹⁰ include:

Q. How effective was the course in increasing your ability to recognise unacceptable behaviour?

- 92.83% who attended onsite indicated very good or good
- 92.35% who attended online indicated very good or good

Q. Did the participant report an increase in confidence in calling out unacceptable behaviour?

- 79.21% who attended onsite indicated yes¹¹
- 91.89% who attended online indicated yes

Q. How effective was the course in signposting support services and sources of help available?

- 96.17% who attended onsite indicated very good or good
- 94.51% who attended online indicated very good or good

⁷ House of Lords Conduct Committee, [Valuing Everyone Training; ICGS Investigations: Former MPs](#), HL Paper 158, October 2020; [debated](#) in the House on 2 November 2020.

⁸ Lords Commissioner for Standards, [Failure to Attend Valuing Everyone Training](#), 18 May 2021.

⁹ House of Lords Conduct Committee, [The Conduct of Lord James of Blackheath, Lord Kalms, Lord Willoughby de Broke and Baroness Mone](#), HL Paper 36, June 2021; [debated](#) in the House on 20 July 2021.

¹⁰ These cover the period since the training was introduced in 2019, until 30 June 2021.

¹¹ It is not clear why there is a notable difference between those attending face-to-face workshops and those participating online in reporting increased confidence in calling out unacceptable behaviour. However, this was something that the course providers increasingly emphasised, following initial feedback, so later sessions may have provided participants with a different experience of the training. The audiences have also changed over time, with Administration staff forming a larger part of the earlier face-to-face training, and Members and Members' staff forming a larger part of the later online training. It might be that the different perspectives and experiences of these audiences explain some of this difference.

Q. *Would you recommend the course to others?*

- 99.63% who attended onsite indicated yes
- 97.18% who attended online indicated yes

38. From questions on the evaluation forms, as well as through informal feedback with the providers, themes and insights have emerged, including:

- the ideal size and mix of participants of each training session;
- the training methods and content of the training, including whether the scenarios and case studies discussed are tailored for those attending;
- appreciation of the group size and skilled facilitation, with many commenting that the training was more useful than they had expected;
- some interest in having more case studies and opportunities for more detailed discussions;
- whether the training should be voluntary or mandatory for different groups of participants and whether refresher sessions should be offered; and
- feedback for the ICGS itself, with the training proving to be an invaluable forum for suggesting improvements to the way in which the Scheme is operated and communicated.

Next steps for Valuing Everyone training

39. The 18-month review of the ICGS praised the quality of the Valuing Everyone training course, and noted the positive feedback that participants continued to provide.

40. The review made a number of recommendations to ensure that those groups who currently saw lower rates of participation could be encouraged or mandated to complete the training to ensure that the content of the training could be refreshed and improved during the next phase and that it could be offered to participants on a regular or cyclical basis, rather than as a one-off session.¹² This chimes with the feedback received from the provider mentioned above, specifically that the training could be tailored for specific groups attending.

41. Key stakeholders in both Houses and the ICGS team are currently working on these recommendations, ensuring that this work continues to provide a safe space where members of the parliamentary community can discuss the Behaviour Code and what is considered appropriate behaviour, while discussing the different contexts in which we all work.

¹² [Independent Complaints & Grievance Scheme: Independent 18-month review](#), Alison Stanley CBE FCIP, 22 February 2021, paragraphs 228 to 247.

4. The ICGS Helpline

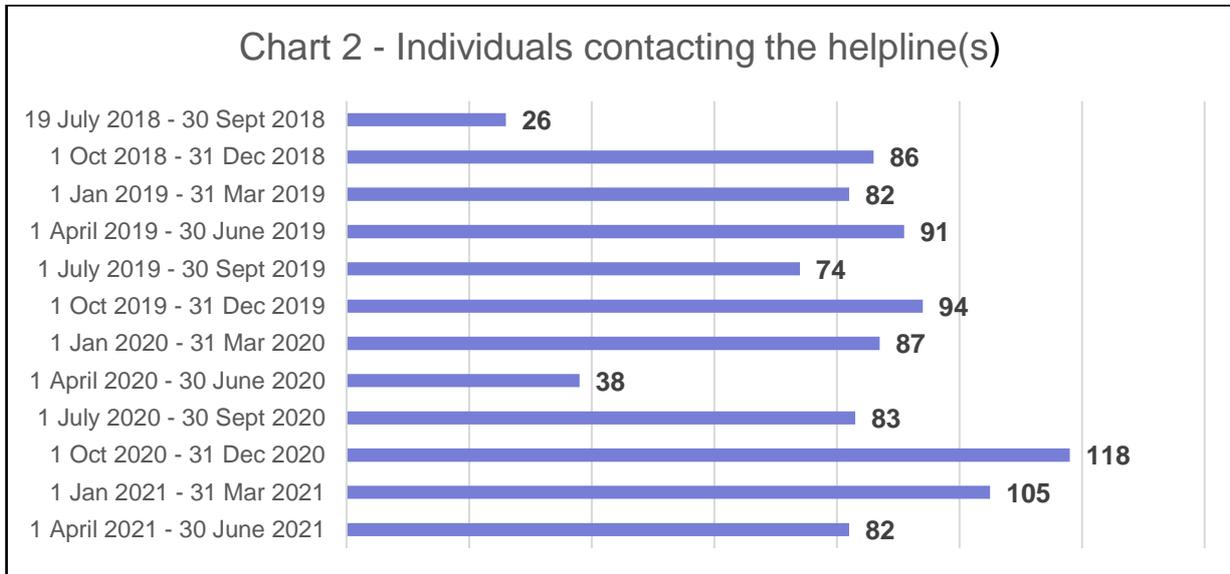
Introduction

42. The ICGS Helpline plays a pivotal role in providing independent, confidential advice in a safe place. Our current Helpline provider is Victim Support. Past and present members of the parliamentary community can call the Helpline on 0808 168 9281 from 9am to 6pm, Monday to Friday or can send an e-mail to support@ICGShelpline.org.uk. While the Helpline is a channel for making an official complaint, its primary role is to be a source of support and guidance. All callers contacting the Helpline deal directly with a highly-trained expert and callers often seek advice or signposting to our other support functions, including counselling through the Employee/Individual Assistance Programme.
43. From the start of the ICGS to the beginning of this reporting year, two independent providers delivered the Helpline service. The bullying and harassment Helpline was provided by Health Assured and the independent sexual misconduct advisory (ISMA) service was provided by Solace. With their contracts ending in June 2020, a competitive tendering exercise was held to procure a provider for helpline services going forward. A new provider, Victim Support, was successful, taking over both Helplines and integrating them into a single service from 3 July 2020.
44. The contract is for an initial term of three years, with the options to extend for another year.¹³ The new provider Victim Support commenced delivery of the Helpline service at the start of the new contract, with no loss of support for users across the parliamentary community, and has built on the strong foundations laid by the previous providers. Quarterly statistics on the use of the Helplines are proactively published on the parliamentary [website](#).

¹³ Although the contractual start date for the new provider was 3 July 2020, the data presented in this chapter of the Annual Report relates to the period from 1 July 2020, which represents the start of the reporting year. To avoid double counting, any data relating to the period between 1 and 3 July 2020 was passed from the previous providers to the new provider, as part of the transition.

Number of people contacting the Helpline

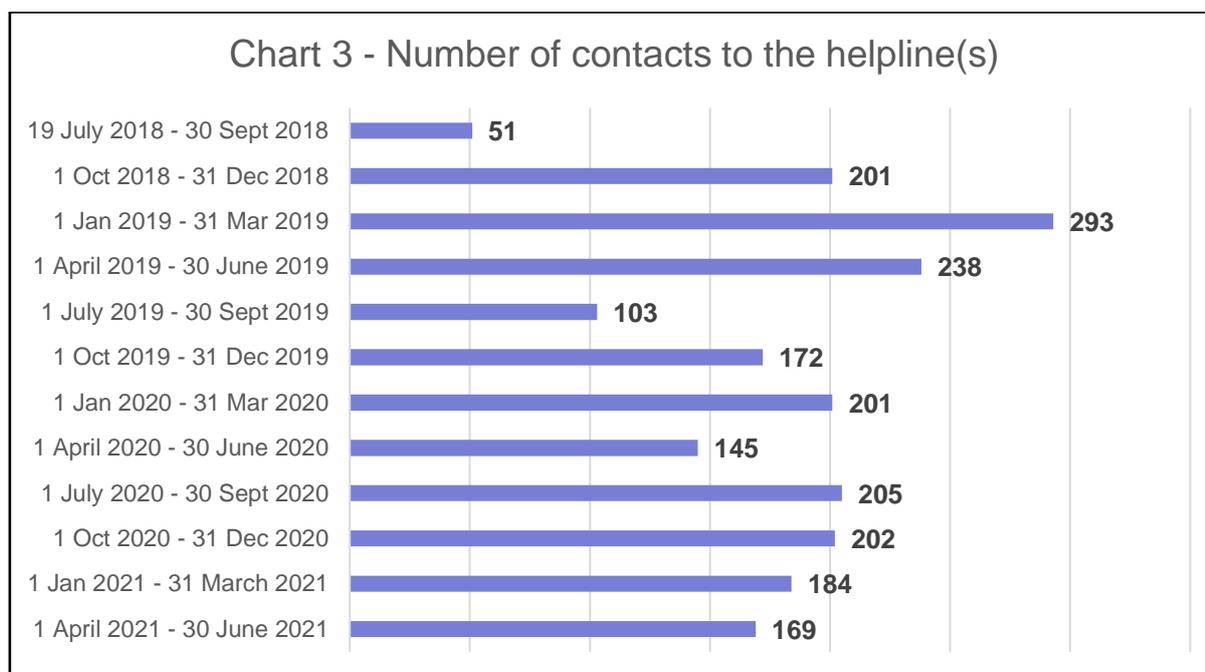
45. In this reporting year, 388 different people contacted the Helpline, either by phone or by email. This compares with 293 people contacting the Helplines during the previous year, and 285 during the first year of the ICGS, 2018-19. A quarterly breakdown of these figures, since the Scheme began, is set out in Chart 2 below:



46. Since the start of the ICGS, the number of different people contacting the Helpline has remained relatively consistent, between 80 and 100 each quarter. An outlier appears to be the April to June 2020 quarter, which coincided largely with the first lockdown during the Covid-19 pandemic and (in common with many workplaces nationwide) Parliament adapting to these restrictions through either ceasing certain types of activity altogether, or adapting some through working from home or in a hybrid model. By contrast, the two quarters of October to December 2020 and January to March 2021 had the highest numbers of people contacting the Helpline since the Scheme's launch.

Number of contacts to the Helpline

47. From 1 July 2020 to 30 June 2021, there were 760 inbound contacts to the Helpline, comprising 271 (36%) phone calls, and 489 (64%) emails. This compares with 621 inbound contacts to the two Helplines in 2019-20, and 783 during the first year of the ICGS, 2018-19. A quarterly breakdown of these totals, since the Scheme began, is set out in Chart 3 below:



48. Again, this chart suggests a degree of consistency in the volume of contacts to the Helpline(s) since the Scheme began. The low volume of contact to the Helpline in the July to September 2019 quarter coincided with Parliament's summer recess, with a less noticeable decrease than the previous chart during the first Covid-19 lockdown in 2020. Comparing the number of unique individuals contacting the Helpline in this reporting year and the overall volumes of contacts highlights the fact that there were more people contacting the Helpline this year, but contacting it fewer times on average than in other periods.

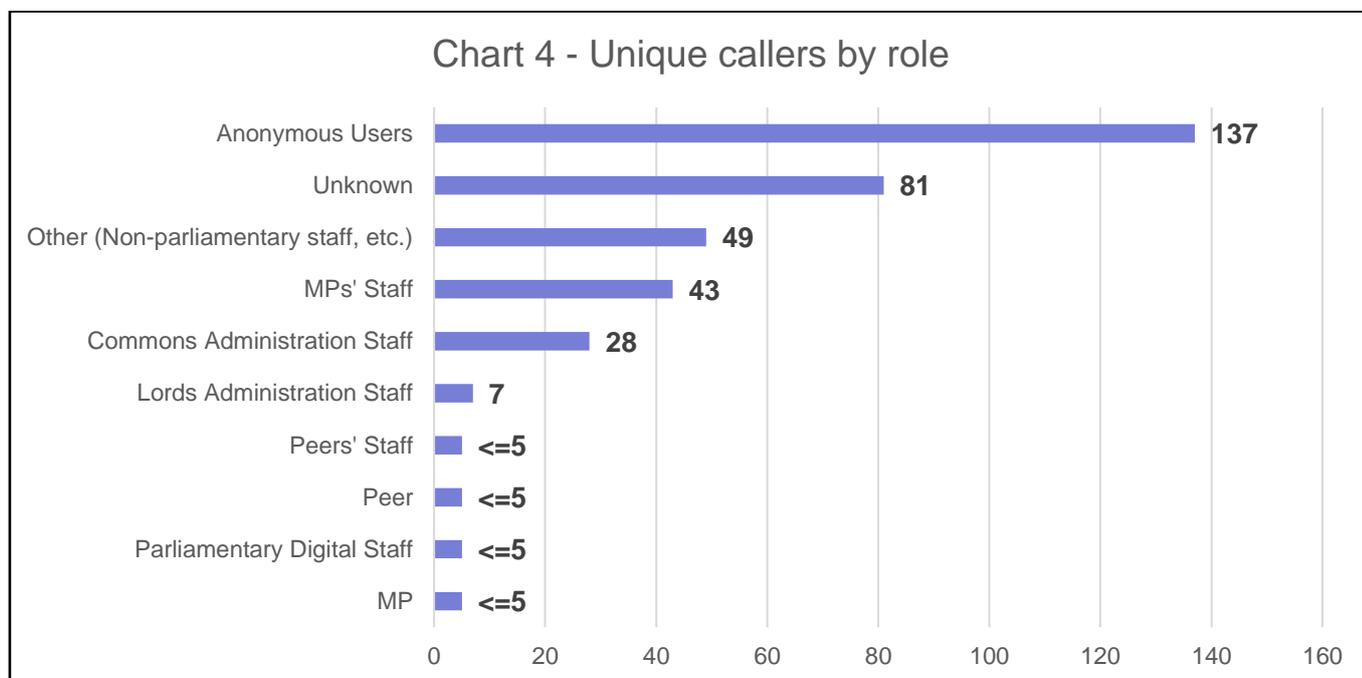
Which groups are contacting the Helpline?

49. A breakdown of those making contact with the Helpline in 2020-21 is set out in Chart 4 below. About 60% of people who made contact fall into the categories of 'unknown' (where contacts did not provide sufficient information to record this information) or 'anonymous' (where callers preferred not to state their role or position within the parliamentary community). This is an increase from last year, when 22% of all callers were unwilling to state where they work.

50. This increase in anonymous callers could be as a result of the new Helpline provider, Victim Support, using a different method to capture the information from the previous Helpline providers. It is also important to note that anyone can call the Helpline, not only members of the parliamentary community, but also for

example former members of the parliamentary community, members of the public and the press, for a variety of reasons. While it would be helpful to know who is calling the Helpline, we appreciate the fact that many wish to remain anonymous. It is encouraging that this service is being used so frequently by people who are accessing support and/or putting issues on record and who are able to retain their anonymity, if they so wish.

51. Another 14% were categorised as ‘other’, which includes contacts from outside the parliamentary community. Beyond these, the two largest groups making contact with the Helpline were MPs’ staff (43, or 12%) and staff of the House of Commons Administration (28, or approximately 8%). Both these groups featured prominently in the previous reporting year. It should be noted that Commons Administration staff and MPs’ staff comprise the two largest groups of the parliamentary community. Their apparently high numbers contacting the Helpline is potentially proportionate to their group size, rather than an indication of a particular issue unique to these groups. In 2020-21, all other identifiable groups of contacts to the Helpline number below ten.¹⁴

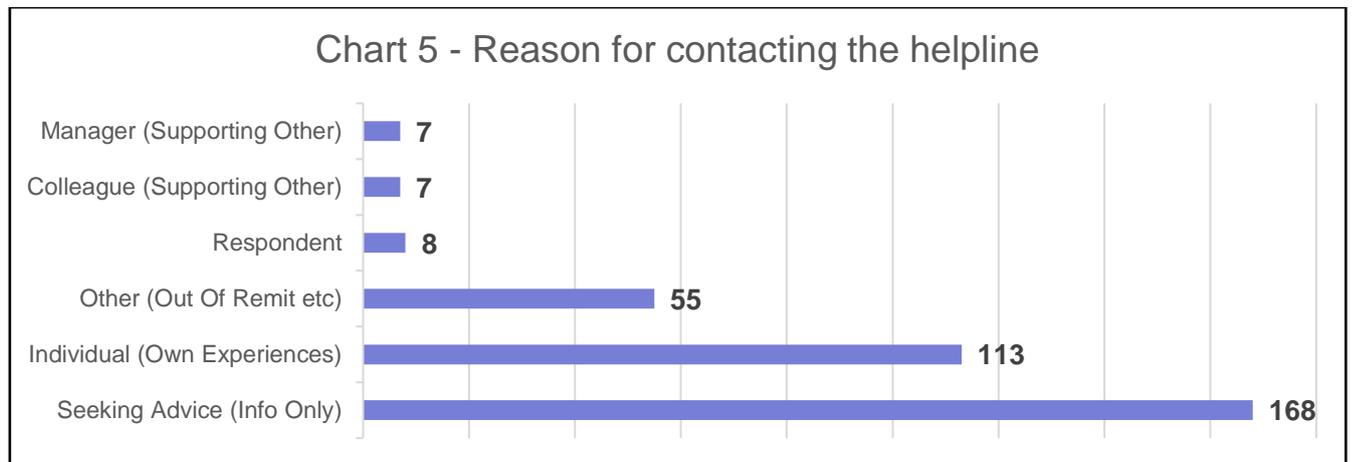


Why are people contacting the Helpline?

52. Chart 5 below provides a breakdown of the reason or motivation for those people contacting the Helpline during this reporting year. This is new data, which the ICGS team received from the new provider, Victim Support. The largest group (168 or about 47%) made contact to seek advice or information; the second largest group (113, 32%) made contact in connection with their own experiences. By contrast, relatively small numbers (below ten in each case) made contact

¹⁴ Values below five have been rounded to five, to avoid the risk that numbers fewer than five enable individuals to be identified.

either as a manager in support of someone else, as a colleague in support of someone else, or as a respondent to a complaint.



5. Investigating complaints

Introduction

53. From September 2018 until September 2020, the ICGS held contracts with two sets of organisations for the provision of independent investigators, the Andrea Adams Consultancy and Conflict Management Plus Solutions. In July 2020, the original contract term for these providers came to an end and the new competitive tendering exercise was started. As a result, new contracts were signed with three providers in September 2020 for an initial two-year period, with contract extension options of two further 12-month periods. The three providers are CMP Solutions, Total Conflict Management (TCM) and EA Inclusion and all have investigators who are experienced in workplace investigations about bullying and harassment and sexual misconduct.
54. The House of Commons voted to extend the Scheme to non-recent cases on 17 July 2019,¹⁵ in line with Laura Cox's second recommendation in her October 2018 independent report on bullying and harassment of staff in the House of Commons.¹⁶ Following this agreement, in December 2019, independent investigators with experience from the commercial, public and law enforcement sectors who were recruited specifically to investigate non-recent and more complex cases. These investigators are commissioned on a case-by-case basis by the ICGS team.
55. In the following tables in this chapter, last year's figures (2019-20) and the Scheme's first year's figures (2018-19) have been corrected and adjusted in order to make comparisons with 2020-21. This means that the data in this chapter is not comparable with the 2019-20 Annual Report or the 2018-19 Annual Report.¹⁷
56. There were 48 investigations completed this year (more than any year before), 11 of which were started and completed during this reporting period and 37 of which were cases carried over from the preceding years. Of these 46% were upheld, and 54% were not upheld. (For commonly-used words and terms, please see Annex A).
57. During this reporting year, 45 cases were started, with 42 progressing to an initial assessment and 38 progressing to a full assessment. There were 34 ongoing cases as of July 2021.
58. To ensure confidentiality, for statistics relating to individuals, only numbers above five have been reported.

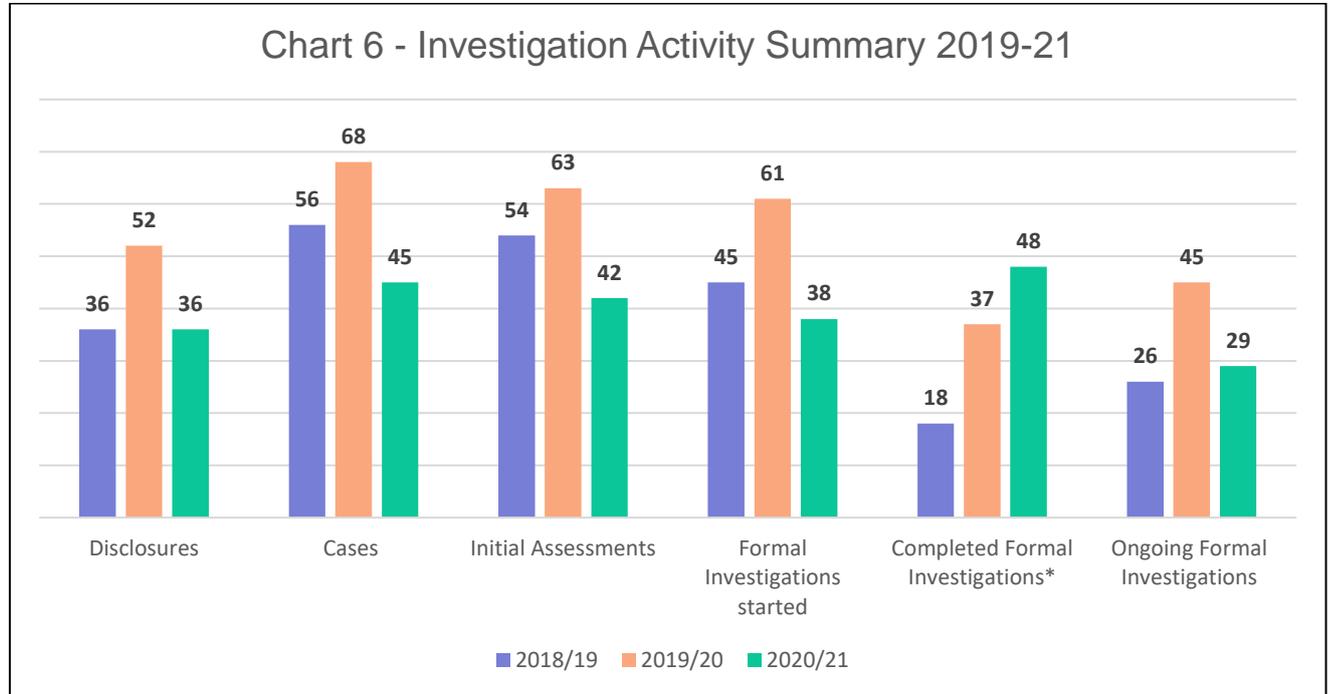
¹⁵ [Debate on the ICGS](#), House of Commons, vol 663, Wednesday 17 July 2019.

¹⁶ [The bullying and harassment of House of Commons staff: Independent Inquiry Report](#), Dame Laura Cox DBE, 15 October 2018

¹⁷ [ICGS Annual Report 2019-2020](#) and [ICGS Annual Report 2018-2019](#)

Information on investigations

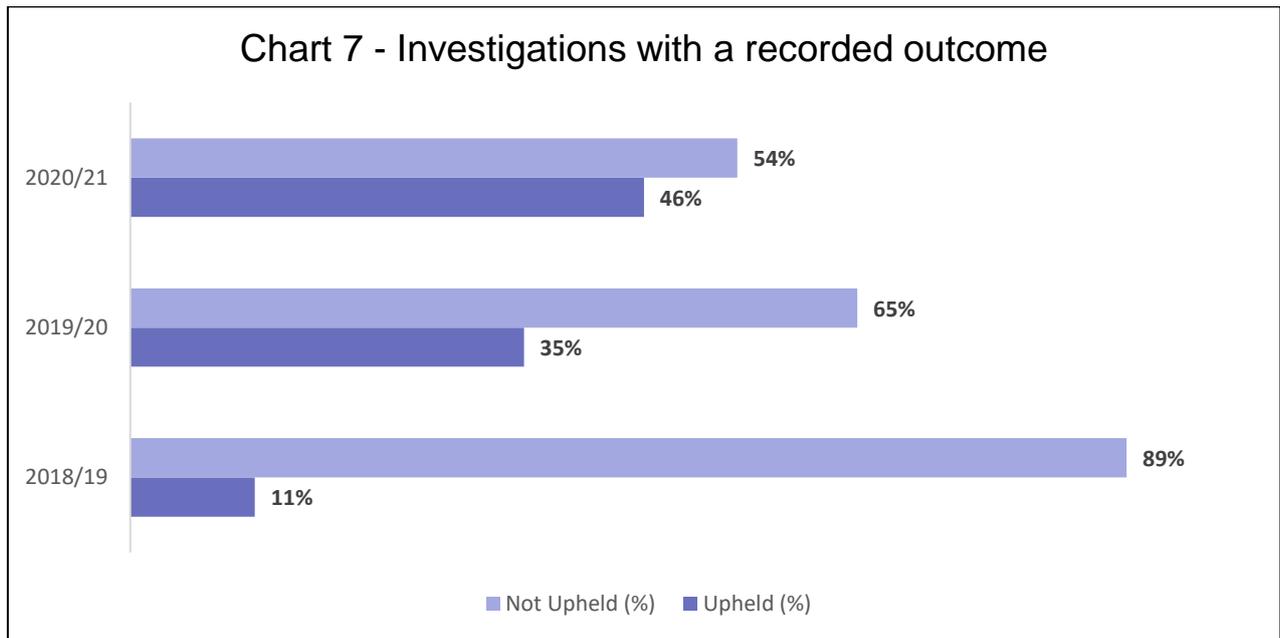
59. Chart 6 shows that there has been an overall reduction in cases during this reporting year, with a decrease in volume across all stages of the investigation process:



*This figure reflects only those investigations that have progressed to a full investigation and had an “upheld” or “not upheld” finding. It does not take into account any cases where informal resolution was an outcome, or when the complainant withdrew their complaint. This includes cases that started in 2018/19 and 2019/20, and were closed in 2020/21.

60. This reporting year, 91% of disclosures sent from the Helpline to the ICGS team were complaints under the bullying and harassment policy and 9% were complaints under the sexual misconduct policy. This is roughly the same percentage split as in previous reporting years.

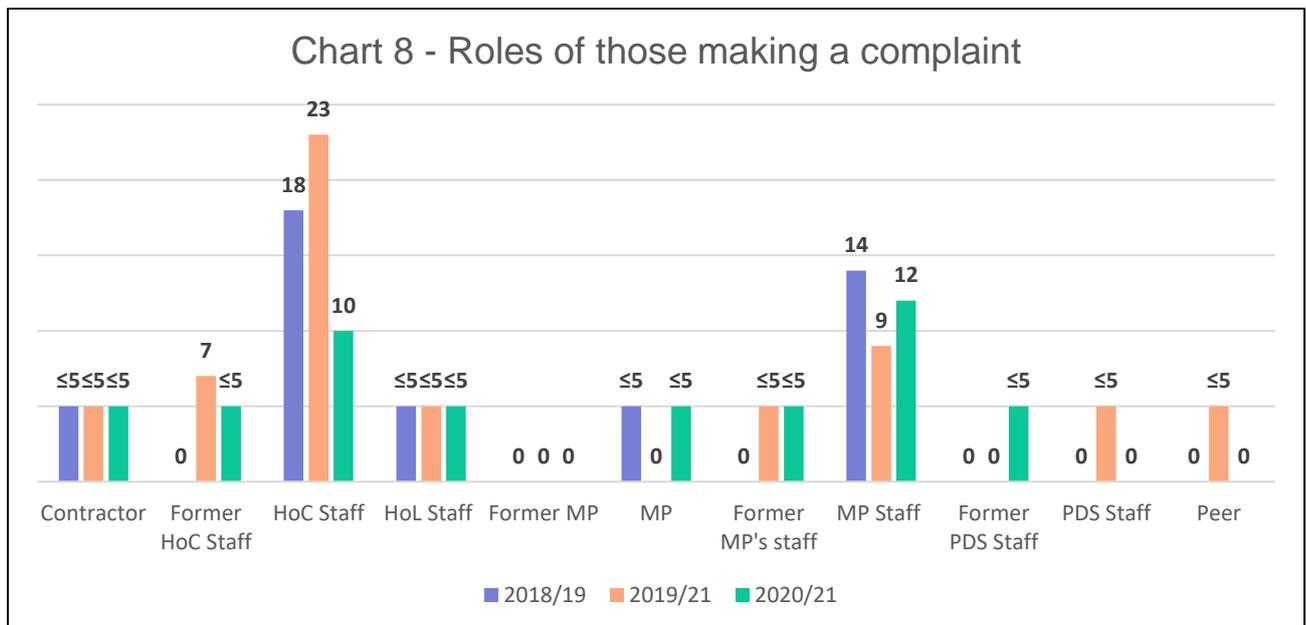
61. Chart 7 shows the outcomes of investigations, whether a complaint was upheld or not upheld by the investigator at the end of a completed formal investigation:



62. To calculate this data, completed formal investigations for each year was used. There were 48 completed formal investigations in 2020/21, 37 in 2019/20, and 18 in 2018/19 (outlined in Chart 6).

Complainant and respondent roles

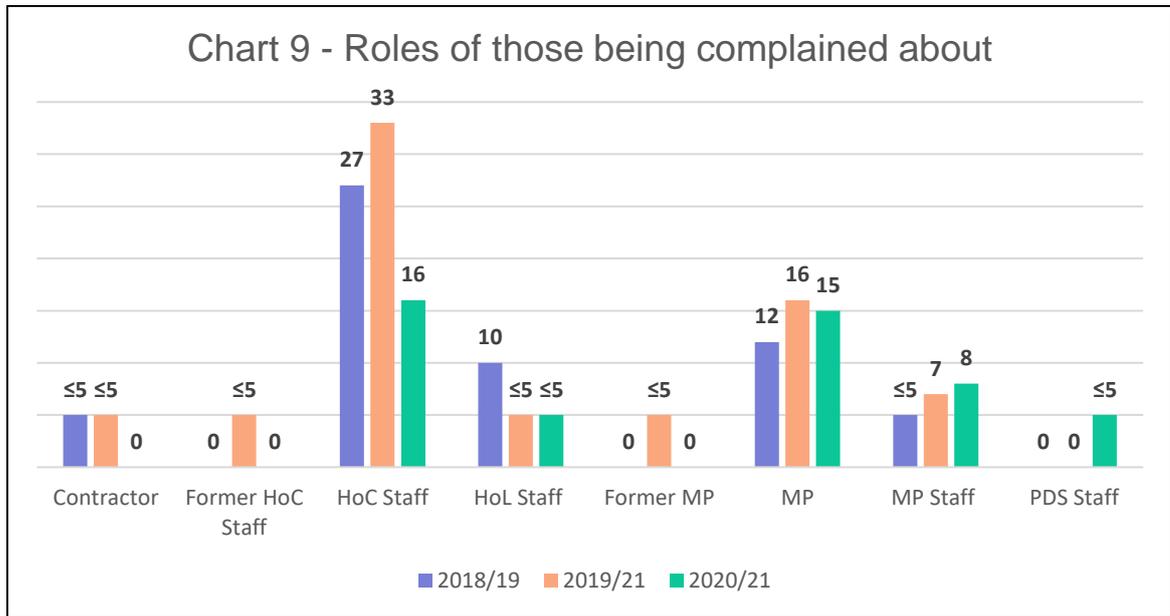
63. Chart 8 shows the roles of those making complaints under the Scheme:



64. To calculate this data, the complainants' roles recorded on disclosure forms received that year were used. The largest complainant group in 2020/21 was MPs' staff. The group of MPs' Staff is the largest single group in the

parliamentary community, with House of Commons staff being the second largest.¹⁸

65. Chart 9 below provides information on the roles of those being complained about:

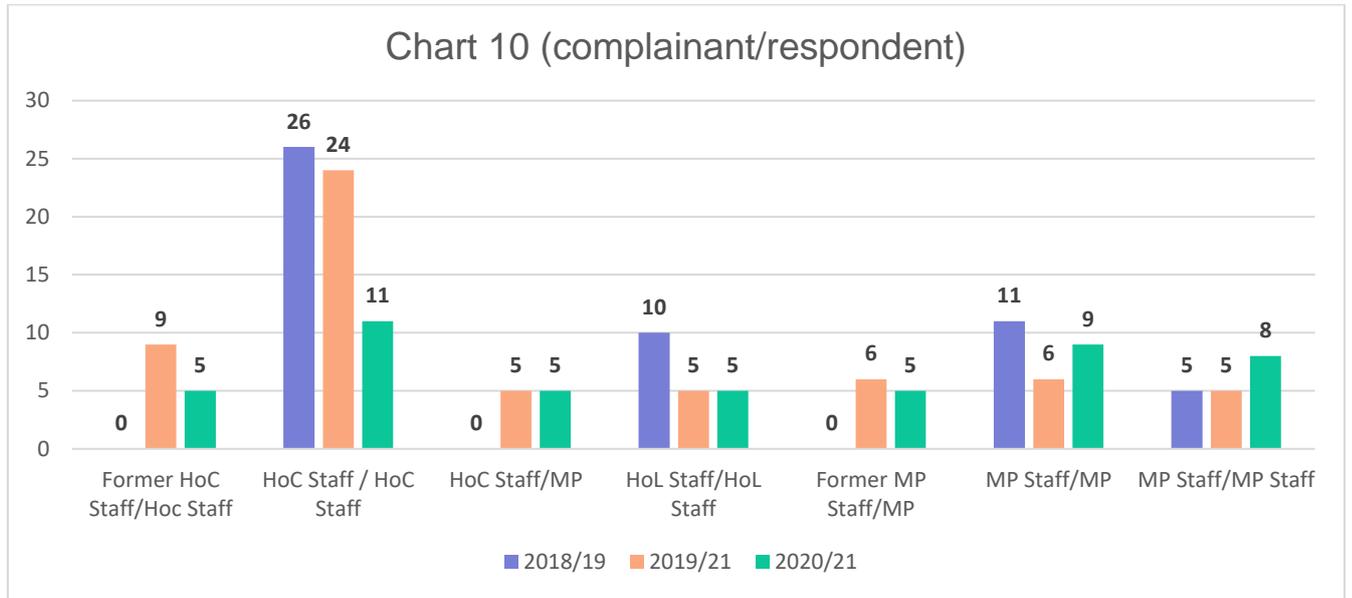


66. To calculate this data, when a case is assigned a case number that year, respondents' roles are recorded. The largest respondent group in 2020/21 was House of Commons staff. House of Commons staff are the second largest single group in the parliamentary community, with MPs' staff being the second largest.¹⁹

¹⁸ See Chart 1 above for a breakdown of the number of people in each parliamentary group

¹⁹ See Chart 1 above for a breakdown of the number of people in each parliamentary group

67. Chart 10 shows the role of person making a complaint and the role of who they are complaining about, written (complainant/respondent) in the chart:

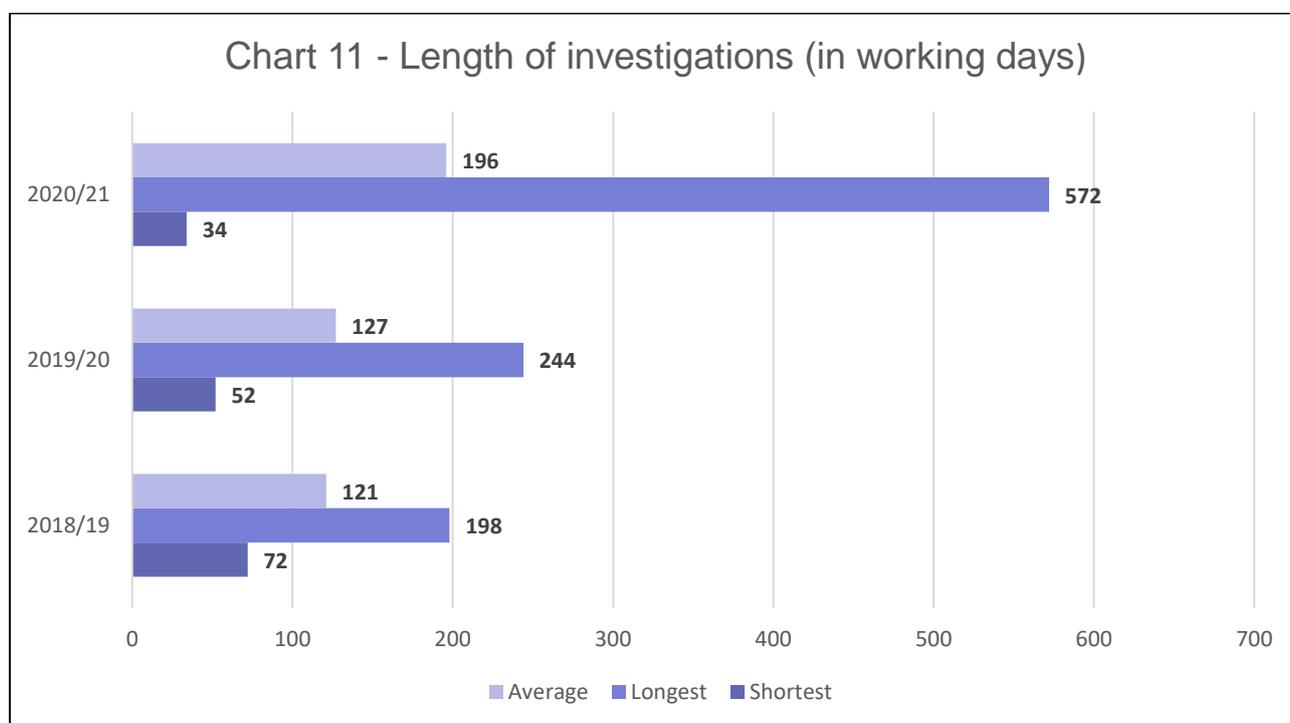


68. To calculate this data, complainant and respondent roles—as recorded for each case—are used.

Timescales

69. In her independent report into the ICGS, Alison Stanley commented on the time taken for some ICGS cases. She listed reasons for investigations taking a long time, including issues surrounding the pandemic (particularly as a result of people self-isolating or being affected by illness), the process being over complicated, specialist case-management capability in the ICGS team was limited up to the first half of 2020 and so the tracking progress of cases was not prioritised, given the limited capacity within the ICGS team.²⁰ Other delays were as a result of pauses in investigations (requested by a complainant or respondent, for wellbeing issues), the unavailability of witnesses, or delays in obtaining relevant evidence.

70. Chart 11 shows the time taken to complete all investigations closed in that reporting year. The number of completed investigations for each year are as follows: 48 closed cases in 2020/21; 37 closed cases in 2019/20; and 18 closed cases in 2018/19.



71. Of the 48 investigations completed this year, 37 were cases carried over from proceeding years (some of which were complex, non-recent cases). Every effort is being taken to reduce the length of time of investigations—through greater efficiencies, extra resources in the team, streamlining the processes, better training and guidance for investigators—while not compromising the rigour and robustness of investigations. However, the complexity of some ICGS cases inevitably means that such cases will take a great deal of time to investigate.

²⁰ [Independent Complaints & Grievance Scheme: Independent 18-month review](#), Alison Stanley CBE FCIP, 22 February 2021, paragraph 99

6. Investigations into Members of both Houses

Members of Parliament and the IEP

72. As with all Decision-making bodies, the ICGS team works closely with the Office of the Parliamentary Commissioner for Standards (OPCS). The ICGS and the OPCS have agreed an oversight document, which clearly sets out the process to be followed for ICGS cases where the respondent is a Member of Parliament. More information on the work of the Commons' Parliamentary Commissioner for Standards can be found in the PCS's [Annual Report 2020-21](#).

73. In June 2020, MPs approved motions to establish an Independent Expert Panel (IEP) with the power to determine sanctions in cases involving MPs, after the ICGS process is completed. This was in response to Laura Cox's third recommendation, that "the process for determining complaints of bullying, harassment or sexual harassment brought by House staff against Members of Parliament will be an entirely independent process, in which Members of Parliament will play no part". Recruitment for members of the IEP concluded in November 2020 and the Panel started hearing cases in early 2021. The Chair of the IEP is the Rt Hon Sir Stephen Irwin.²¹

74. The IEP is entirely independent, with no MPs taking part in its decisions. The core function of the IEP is to determine sanctions in ICGS cases referred to it by the Parliamentary Commissioner for Standards (PCS), where the PCS does not have the necessary sanctions available to her and to hear appeals from either complainants or respondents against the PCS's decisions in ICGS cases involving MPs or former MPs. The House of Commons must approve a sanction that can only be imposed by the House. The motion to impose a sanction is decided without debate.

75. On 19 October 2021, the House of Commons voted for a standing order provision that if the IEP determined a sanction that would, if recommended by the Committee on Standards, attract the provisions of the Recall of MPs Act 2015, the Committee on Standards would automatically make a recommendation for a suspension of equal length.²²

76. In her report, Alison Stanley highlighted factors undermining confidence in the ICGS:

The current perception among a proportion of staff is that those who have been found to have bullied or harassed another or sexually assaulted

²¹ Details of all the IEP panel members can be found [here](#).

²² [House of Commons debate on the IEP Recommendations for Sanctions and the Recall of MPs Act 2015](#), Hansard, 19 October 2021

them are not being held to account. This is due to confidentiality constraints resulting a lack of visibility of such decisions and sanctions in respect of staff. The same perception pertains to MPs due to the lack of any published reports to date regarding ICGS complaints against them.²³

77. This position has now changed with the publication of the Independent Expert Panel's reports, all of which were published after the 18-month review report. To date, the IEP has published [six reports](#) on cases involving the conduct of Mr Ross Thompson (which was not upheld) and the conduct of the following MPs or former MPs (which were upheld): Mr Jared O'Mara, Mr Mike Hill, Mr Rob Roberts MP, Mr Daniel Kawczynski MP and Mr. Keith Vaz. Of these cases, that of Mr Rob Roberts MP carried one of the most serious sanctions available to the IEP, that of suspension.²⁴

78. As a result of the implementation of Laura Cox's second and third main recommendations (that non-recent cases should be eligible under the ICGS and that there should be no MP involvement in ICGS cases against MPs), the case against Mr Keith Vaz, which involved incidents that happened between the autumn of 2007 and the winter of 2010, was able to be investigated under the ICGS (overseen by the Parliamentary Commissioner for Standards). His sanction was considered by the Independent Expert Panel. The complainant in this case made some public comments about how the ICGS process could be improved and the ICGS team also sought her feedback. Work to implement Alison Stanley's recommendations is ongoing. (Please see Chapter 7 for more details).

79. Confidence within the parliamentary community will continue to grow as the impact of the ICGS is realised through the Decision Making Bodies such as the IEP. The recently published reports on current and non-recent cases in the Commons, alongside previously published reports relating to the Lords, demonstrate how the ICGS process works from beginning to end: from the ICGS Helpline to the Independent Expert Panel or the Lords Conduct Committee. This transparent process and accountability will in turn help to improve the culture and behaviour of all members of the parliamentary community.

80. More details of the work of the IEP can be found on [the IEP internet site](#).

Investigations by the House of Lords Commissioner for Standards

81. Complaints of bullying, harassment or sexual misconduct about Members of the House of Lords or Lords Members' staff are handled under the provisions of the Lords Code of Conduct and Guide to the Code, rather than directly through the policies and procedures of the ICGS (applying the same definitions of bullying,

²³ [Independent Complaints & Grievance Scheme: Independent 18-month review](#), Alison Stanley CBE FCIP, 22 February 2021, paragraph 178

²⁴ Two of those cases included an appeal against the decision of the Parliamentary Commissioner for Standards and one case involved an appeal against the decision on sanction made by the Independent Expert Panel sub-panel.

harassment and sexual misconduct, and with investigations being led by the independent Lords Commissioner for Standards and assisted by an ICGS independent investigator). The ICGS team works with the Commissioners' office on sharing information about the expertise and availability of ICGS independent investigators.

82. During the period covered by this Annual Report, there were seven reported investigations of complaints of bullying, harassment or sexual misconduct by Members of the House of Lords. Two of these cases, those of Lord Ahmed and Lord Maginnis of Drumglass, carried the most serious sanctions available under the Code, expulsion and suspension from the House.²⁵

²⁵ Five of these cases were subject to appeal to the House of Lords Conduct Committee: [The Conduct of Lord Stone of Blackheath](#), July 2020; [The Conduct of Lord Ahmed](#), November 2020; [The Conduct of Lord Maginnis of Drumglass](#), December 2020; [The Conduct of Baroness Tonge](#), April 2021; and [The Conduct of Lord Singh of Wimbledon](#), June 2021. The other cases were: [The Conduct of Lord Lea of Crondall](#), August 2020; and [The Conduct of Lord Singh of Wimbledon](#), January 2021. More information on the work of the Lords Commissioner for Standards may be found in the Commissioner's [Annual Report 2020-21](#).

7. Alison Stanley's 18-month review of the ICGS

83. Alison Stanley published the [18 Month Review on the Independent Complaints and Grievance Scheme](#) on 23rd February 2021. Her review was comprehensive and she received 706 responses to a feedback survey, held more than 100 meetings and had 50 confidential contributions by those who have used the ICGS. The ICGS team worked collaboratively with Alison Stanley, provided her with detailed information and analysis and had regular discussions with her about all aspects of the ICGS process.

84. In her summary of the report, Alison Stanley wrote:

Since the six-month review there has been much progress on the implementation of the Scheme. It is now embedded and operating for all groups across Parliament and there are high levels of awareness of the Scheme and the ICGS Helpline, which provides advice, support and the formal reporting of complaints. This is due to the strong focus on communication using varied media and to the high levels of attendance on the core Valuing Everyone training.

[...]

The Scheme is a sophisticated workplace, one with two sets of separate independent expert providers in the ICGS Helpline and the Independent Investigators services. Its effective implementation and operation is a substantial achievement in the complex organisational context of Parliament, with the mix of employers, employees, office holders and elected representatives, together with the differences in the decision-making, governance and regulatory frameworks in each House.²⁶

85. The Terms of Reference included a review of the following:

- The operation of the ICGS;
- The time taken to complete investigations;
- The effectiveness of provisions to allow alternative, informal resolution, and the rules around confidentiality;
- Awareness of the ICGS across different groups within the parliamentary community and its impact on them;
- The rights to review or appeal ICGS findings at different stages;
- Cluster or third-party reporting under the Scheme;

²⁶ [Independent Complaints & Grievance Scheme: Independent 18-month review](#), Alison Stanley CBE FCIP, 22 February 2021, paras 1 and 2.

- Re-consideration of the replacement of the initial assessment with an eligibility test; and
- The date at which non-recent cases are no longer included in the ICGS.

86. As laid out in the executive summary of the report, the 36 recommendations of the review covered the following areas:

- Simplifying and clarifying procedures and processes, to speed up investigations and enable clear communication to complainants and respondents of what to expect when a claim is made, with a clear process from start to finish;
- Improving the operation, pace, and experience of investigations for both complainants and respondents;
- Increasing support for complainants and respondents when using the Scheme;
- Creating an effective governance mechanism, so that changes to procedures and processes in the Scheme can be made quickly and equitably, across Parliament;
- Ensuring diversity and inclusivity is considered at every stage of the process, ensuring that all groups have equal access to and confidence in the Scheme;
- Refreshing the Valuing Everyone training;
- Communicating the Scheme; and
- Addressing outstanding policy issues from the 6-month review, including 3rd-party reporting and cluster reporting.

87. In March and April 2021, Alison Stanley's 36 recommendations were taken to the Commissions of both Houses for discussion. Of the 36 recommendations, 33 were agreed by the Houses. An Equality Analysis on the recommendations was carried out in March 2021.

88. On 22 April 2021, the House of Commons passed the motion endorsing the report of the House of Commons Commission, which included revisions to the policies and procedures, as recommended in the 18-month review. The policies and procedures were separated into four documents and changes to language, terminology and definitions were made, to align the two policy documents. The procedures have been amended to enable the independent investigator to consider, at the initial assessment stage, whether the complaint has already

been fully and fairly considered in another context. If it has, this will be sufficient grounds for rejecting the complaint at the initial assessment stage.

89. Between March and April 2021, the ICGS team met with ICGS stakeholders, both internal and external, to discuss the implementation of each recommendation. Throughout May and June, the ICGS team ran a series of four themed consultation sessions with the ICGS Stakeholder Group, outlining the proposed approaches for implementing each recommendation.²⁷ The themes of the consultations focused on accessibility and communication, policy and operations. To date, 25 of the 33 recommendations have been implemented, with the other eight either partially implemented or in the process of being implemented.

90. It is anticipated that all the remaining recommendations will be implemented by the end of 2021. Substantial progress has been made against the remaining recommendations:

Recommendation 5

A proposed process has been presented to stakeholders, including to Decision-Making Bodies. Further consultation and stakeholder engagement is planned before completion.

Recommendation 6

This recommendation will monitor the implementation of Recommendations 4 and 5. It will be implemented following the completion of Recommendation 5.

Recommendation 13

Steps in the process have been reviewed by the ICGS Team. Significant work has been done to update our standardised timeline for cases which will be used to hold investigators to account and communicated to complainants and respondents

Recommendation 19

Responsibility for implementing this recommendation sits with the Decision-Making Bodies (DMBs). The ICGS team has liaised with DMBs.

Recommendation 22

The Deputy Director role has been recruited and a new structure was proposed to the ICGS team and the Trade Unions during a two-week consultation period which closed in October 2021. Recruitment for new/open roles will take place in the Autumn/Winter of 2021 and the new team structure is anticipated to be in place by the end of 2021.

Recommendation 23

²⁷ The ICGS stakeholder group was formed in June 2019 and is composed of representatives from the ICGS team, the decision-making bodies, the trade union representatives, diversity and inclusion colleagues from both Houses, learning and development colleagues from both Houses, the Conduct Committee and the Independent Expert Panel.

The governance arrangements and the establishment of the Change Control Group are awaiting final approval by the relevant bodies.

Recommendation 31

Early discussions, with staff of both Houses (including the Culture Change teams), have been held to explore the possible requirements for training in the next phase.

Recommendation 33

A bicameral working group was established in July 2021 to consider how to implement 'cluster reporting' and a way of enabling potential complainants to record details of incidents they have experienced and (subject to various safeguards) to be alerted to other potential complaints about the same individual, in order to help them to decide if they wish to pursue a formal complaint. The working group's proposals will be considered by the relevant authorities in both Houses in October 2021.

9. Looking forward

91. In the coming year, the ICGS team is prioritising work on:

- assessing accurately and consistently work carried out by investigators, which will improve the quality of reports and the time taken to investigate cases;
- building and improving on the option of informal resolution of cases;
- improving and developing resources for the investigators and utilising a greater mix of skills offered by the investigators;
- understanding and building on the experience of users of the Scheme, through established feedback mechanisms;
- acting on feedback from users of the Helpline, users of the Scheme, investigators and key stakeholders to inform and develop the Scheme at all stages;
- supporting the new ICGS team restructure, to ensure delivery across the service, with roles linked to responsibilities and ensuring no delays in progressing cases;
- establishing the new ICGS governance structure, if agreed, to ensure procedural and process changes to the Scheme are delivered equitably and quickly: and
- ensuring that the Valuing Everyone course is refreshed and that all key stakeholders have input into the content of the new course.

Annex A: Developments in the ICGS

Date	Milestone
2017	
01/11/17	Allegations and accounts in the Press of inappropriate behaviour and a culture of bullying, harassment and sexual misconduct at Westminster led to the establishment of a cross party working group on an independent complaints and grievance policy.
2018	
08/02/18	Cross-party, bicameral Working Group on an Independent Complaints and Grievance Policy published its report.
28/02/18	Resolution passed in the House of Commons to develop a Parliament-wide behaviour code and an Independent Complaints and Grievance Scheme (ICGS)
01/03/18	Following a Newsnight report on alleged inappropriate behaviour by MPs towards staff, the House of Commons Commission agreed to establish an independent inquiry into bullying of staff in the House of Commons, appointing Dame Laura Cox QC.
18/03/18	House of Lords Commission agreed with recommendations to deliver the recommendations of the Cross-Party Working Group on an Independent Complaints and Grievance Policy(ICGS).
04/07/18	House of Lords Commission endorsed the Behaviour Code; referred it to the Sub-Committee on Lords' Conduct.
13/07/18	The Commons Committee on Standards report published
17/07/18	ICGS Programme Team delivery report published
19/07/18	House of Commons endorsed the behaviour code and policies and procedures related to bullying and harassment and sexual misconduct as laid out in the ICGS Delivery Report.
01/08/18	Updated version of the House of Lords' Code of Conduct published, incorporating the new behaviour code and the rule that Members must treat their staff and all those visiting or working for or with Parliament with dignity, courtesy and respect
15/10/18	Dame Laura Cox QC's report into bullying and harassment of House of Commons staff published
24/10/18	House of Commons Commission considered the Cox report and agreed to three fundamental recommendations highlighted in that report: :•Terminate the valuing others policy and suspend operation of the respect policy recommending that the house terminate it as soon as possible

	<ul style="list-style-type: none"> •Amend ICGS to ensure house employees with complaints involving non recent allegations can now access the Scheme •Ensure the process for determining complaints brought forward by house staff against members will be entirely an independent process in which members of parliament will play no part
24/10/18	House of Commons Commission confirmed that the Valuing Others and Respect Policies had been terminated
05/11/18	General debate held in House of Commons chamber on Dame Laura Cox's report
10/12/18	Committee on Standards published a report into the implications of the Cox report for the House's standards system
2019	
07/01/19	House of Commons agreed lay members of the committee on standards could move motions and amendments including reports and be able to vote
07/01/19	Committee on Standards' report debated and agreed by the House
28/01/19	Alison Stanley appointed by the House of Commons Commission to review of the first six months of the operation of the ICGS
25/02/19	HoC Commission agreed the membership of an Advisory Review Panel
13/03/19	Committee on Standards set out its role in ICGS appeals, deciding to delegate decision-making on appeals to an Appeals Sub-Committee. The Sub-Committee would also deal with cases escalated to the Committee by the Commissioner
18/03/19	Advisory review panel ratify Alison Stanley's appointment and agreed her Terms of Reference
04/04/19	House of Lords' Committee for Privileges and Conduct's report on changes to the Code of Conduct published
30/04/19	House of Lords agreed to the Committee for Privileges and Conduct's report
03/05/19	Committee on Standards launched inquiry into possible reforms to system of sanctions for breaches of the rules set out in the code of conduct for MPs
09/05/19	House of Lords agreed the members who would serve on the Conduct Committee
21/05/19	Consultation on extending the ICGS to non-recent cases launched

12/06/19	Alison Stanley's 6-month review of the ICGS report published
14/06/19	Consultation on extending the ICGS to non-recent cases closed
24/06/19	House of Commons Commission agreed (subject to approval from the House) to extend the ICGS to non-recent cases
24/06/19	Alison Stanley report presented to House of Commons Commission
10/07/19	Naomi Ellenbogen QC's report into bullying and harassment in the House of Lords published
11/07/19	Gemma White QC's report into bullying and harassment of MPs' staff published
17/07/19	House of Commons agreed to extend the ICGS to cover non-recent cases and to be open to all former members of the parliamentary community
21/10/19	ICGS made available to any current or former member of the parliamentary community wanting to raise concerns, seek advice or make a complaint about bullying, harassment or sexual misconduct by MPs, MPs' staff or House of Commons staff, that occurred at any point
2020	
05/03/20	House of Lords Conduct Committee agreed its Report, Progress report and amendments to the rules of conduct
16/03/20	House of Lords Conduct Committee agreed arrangements for the investigation of non-recent cases in the House of Lords under the ICGS
16/03/20	House of Lords approved the Conduct Committee's Report, Progress report and amendments to the rules of conduct
27/04/20	House of Commons Commission confirmed its preferred option of a new independent panel of experts (that would not include current or former MPs) with the power to determine ICGS cases and decide on sanctions that would be implemented, subject to agreement from the House
27/04/20	House of Commons Commission agreed proposals for an independent system
23/06/20	MPs approved motions to establish the Independent Expert Panel whose function will be to determine sanctions in ICGS cases referred to it by the PCS where the PCS does not have the necessary sanctions and to hear appeals from either complainants or respondents against the PCS's conclusions in ICGS cases involving MPs. The House of Commons would be required to approve a motion (without debate) to impose such determined sanctions

09/10/20	Alison Stanley started work on the 18-month independent review of the ICGS
18/11/20	Second ICGS Annual Report published
25/11/20	Members of the Independent Expert Panel appointed
2021	
22/02/21	Alison Stanley published her 18-month review of the ICGS, including 36 recommendations
23/02/21	The Independent Expert Panel published its first report
19/03/21	The Lords Management Board agreed to changes to the ICGS policies and procedures and agrees a cut-off for non-recent cases of bullying and harassment for Lords staff to one year from the last reported case, to start on 22 April 2022
22/03/21	The Commons Commission approved recommendations from the 18-month review
01/04/21	Deadline for Members in the House of Lords to complete Valuing Everyone training
21/04/21	The House of Commons agreed changes to the ICGS policies and procedures, and agrees a cut-off for non-recent cases of bullying and harassment for MPs and Commons staff to one year from the last reported case, to start on 22 April 2022.
19/07/21	The House of Lords commission approved recommendations from the 18-month review

Annex B - Progress on Alison Stanley's 18-month review recommendations

No.		Recommendation	Status
1	Streamlining processes	My first recommendation is that as a matter of priority the ICGS team review and streamline all process steps at each stage from seeking support and advice to the Helpline to the investigation, removing duplication and being clear as to the purpose of each step taken.	Complete
2	Making future changes to Policy and Procedure	My recommendation is that the current Bullying and Harassment and Sexual Misconduct Policy and Procedure are amended as described in the proposal above to enable future changes to be made to the details of the core procedural steps and the underlying processes to give effect to those steps.	Complete
3	Case to answer	Given the adverse impact on respondents of the use of the current phrase and to reflect the intention described in the Policy of this initial stage, I recommend that the terminology 'case to answer' is no longer used with immediate effect. Instead the phrase 'a complaint requiring investigation' should be used. Given the definitions in the two policies, there does not appear to be any bar on ceasing to use the phrase immediately, even if the phrase has not yet been removed from the policies.	Complete
4	Re-opening complaints resolved in other fora	I recommend that where a complainant has disclosed that there have been previous disciplinary, grievance or other proceedings on the incidents or behaviour, the Independent Investigator asks the complainant for any supporting evidence that they have of their complaint, in addition to their own statement. In such cases the Investigator should ask the Decision-Making Body to contact the respondent and any supporting HR advisor, to give a summary account on the proceedings and provide any paperwork produced. The Investigator can then carry out a paper-based assessment as to whether there is any substance to the complaint, that would warrant a full investigation, having considered all relevant factors, including:	In progress

		<ul style="list-style-type: none"> • whether an appropriate procedure was followed in a fair manner in line with the relevant employment policy; • whether the complainant had a right of appeal in those proceedings and whether it was used; • whether the complaint is not materially different to that raised in the internal proceedings; • whether any new evidence has emerged; • whether the complainant has already made an ICGS complaint against another person about the incident or behaviour, and • any other relevant factor. 	
5	Re-opening complaints resolved in other fora	In respect of complaints against members of the House of Commons or their staff that have already been subject to a decision or formal resolution by respondent's political party, I recommend that this same paper-ed assessment be carried out. Detailed implementation to be worked out and agreed by the ICGS team, relevant Decision-Making Bodies and other stakeholders as required.	In progress
6	Re-opening complaints resolved in other fora	I recommend that the operation and impact of this change to the Initial Assessment is implemented with immediate effect and is kept under regular review by the ICGS team in consultation with the Decision-Making Bodies to assess if it is meeting its purpose or any refinement is needed. If a more 32 UK Parliament, Independent Complaints and Grievance Scheme Delivery Report, (July 2018), para 4.3. 22 substantial change appears necessary, then this could be considered through the new operational governance mechanism recommended later in this report.	In progress
7	Threshold criteria	I recommend that the ICGS case managers in their quality assurance role monitor the operation of the Initial Assessment test and if issues arise, consult with the Independent Investigators to learn from their experience, with the Decision Making Bodies, the team of the Parliamentary Commissioner for Standards, the trade unions and staff representatives on whether further refinement is needed to the test and if so what.	Complete
8			Complete

	Right of review of investigation report	In order to avoid duplication of process steps and unduly lengthen investigations, I recommend that the Factual Accuracy Check also be the opportunity for review by both complainant and respondent. Both parties will be provided with a draft of the investigation report before it is finalised containing the summary of the evidence on which the outcome will be founded and the proposed outcome.	
9	Right of review of investigation report	I recommend therefore that the complainant's current right to request a review of the full investigation report, where the finding is that the complaint is not upheld, is removed.	Complete
10	Right of review of investigation report	I recommend that the ICGS team monitor the operation, and impact on timescales for investigations of the Factual Accuracy Check and the removal of the right of review over a six-month period from its' introduction. Based on the 26 outcome of this monitoring, consideration of changes to the Factual Accuracy Check or other action could be considered by the ICGS Stakeholder Group and the ICGS Change Control Group under the new governance mechanism recommended later in this report.	Complete
11	Right of review of investigation report	If the recommendation to remove the current right to review a full investigation by the complainant is not accepted, then I would recommend that for complaints made against staff the Factual Accuracy Check is removed and the current right to review by the complainant extended to the respondent in respect of the full investigation report.	Complete
12	Policy changes	<p>I would recommend changes to the wording of Bullying and Harassment and Sexual Misconduct Policies as listed.</p> <ul style="list-style-type: none"> i) Update the definition of harassment to align it to the Equality Act 2010 as has already been discussed by the House of Commons Commission and already agreed by ICGS Stakeholder Group. Exact wording to be agreed with the House of Lords Conduct Committee as it will also be put to the floor of the House of Lords for agreement; ii) Include references to gendered bullying and bullying based on other protected characteristics or intersectionality and the amendments relating to the definition of 	Complete

		victimisation as recommended by the Cox review. Wording to be agreed using the governance mechanism recommended in this report.	
13	Progress on addressing delays	<p>Given the factors set out above directly leading to slow and lengthy investigations, I recommend that the following related actions be taken to improve investigation pace and consistency.</p> <p>Process: review and streamline the process steps involved from the engagement of a suitable Investigator to completion of the investigation. Test the purpose of each step to clearly understand its value to the process. Alongside this, streamline the forms and documentation required so as to avoid duplication of paperwork. Liaise in doing this with the Parliamentary Commissioner for Standards in her oversight role in respect of MPs.</p> <p>Non-recent cases process: building on the experience of the non-recent complaints to date, in particular but not limited to the evidence and witness identification issues, liaising with the Parliamentary Commissioner in her oversight role, review the process and steps in the investigation continuing to work within the framework of a fair, thorough investigation.</p> <p>Clear requirements of Independent Investigators: the ICGS team to clearly communicate the required content, format and standards for the investigation reports to the Independent Investigators, proportionate to the streamlined process. Build in flexibility so format also proportionate for less complex cases. Make compliance with this standard a contractual requirement.</p> <p>Service: identify the service level requirements under the contract including requirement to keep parties regularly updated, to adhere to the set timescales and promptly report to the ICGS team if the timescales cannot be met and communicate these to the Independent Investigators.</p> <p>Tracking: building on work already underway, establish an effective tracking mechanism which protects confidentiality but allows progress on cases to be understood and challenged at any point.</p> <p>Data: building on work already underway, determine and standardise data collected and recorded so that progress of a complaint through the process steps can be monitored and analysed effectively. Ensure diversity and demographic data is captured and analysed for trends, ensuring anonymity of data.</p>	In progress

		Work with the Helpline, Investigation Service and with the ICGS team itself to establish effective feedback and satisfaction levels, ensuring confidentiality. Use this feedback to identify issues with processes or communications to be able to make changes promptly or take them to the ICGS Stakeholder Group.	
14	Informal resolution mechanisms	<p>I recommend that more routeways for informal resolution are developed by the ICGS team, drawing on the experience of the Independent Investigators with other organisations, and HR. The option of having a contract with an external provider of workplace mediation services suitable for all levels of staff should be considered, including a cost/benefit evaluation and budget arrangements.</p> <p>Working with Members' Services the ICGS team should ensure that some or all of these routeways be appropriate for MPs' staff, as well as for staff of the Administration of both Houses, whether in the normal course of business or on an ICGS complaint. As a principle usually the cost of the use of any external provision would ideally sit with the employer, but this would need to be clearly considered and agreed in this instance in respect of MPs and the Administration of each House.</p>	Complete
15	Helplines	I recommend that demographic analysis of the Helpline usage statistics is carried out as soon as possible now that this data is being collected. This data should be used to confirm whether some groups of staff are using the Helplines less than others, especially where Parliamentary survey and engagement work indicates that these groups are more likely to report bullying and harassment, sexual misconduct and discrimination. I recommend where this is the case, the ICGS team should conduct further research and engagement activities to ascertain the reasons for this so that they can be addressed.	Complete
16	Helplines	I recommend that data is tracked to identify issues, hotspots or trends, to be analysed at quarterly meetings. There should be an immediate feedback loop so complaints about the Helpline service can upon their receipt be promptly investigated and resolved with the caller if they disclose their identity or as a learning to improve the service moving forward if anonymous.	Complete

		The ICGS team working with the HR, Diversity and Inclusion and Culture teams in both Houses, the Voice Champions in the House of Commons, the House of Lords Steering Group for Change and relevant WENs should review the surveys and focus groups that have already been carried out with non-desk based staff to further explore the barriers for them to making use of the Helpline. Building on this feedback to determine the actions that will increase the confidence of these staff in particular to make use of the Helpline for advice and support whether they go on to make a formal claim or not.	
17	Gaps in support	I recommend that the employers as Decision-Making Bodies in the House of Commons and the Lords review their communication messages for respondents to ensure they are clear about sources of support available while maintaining confidentiality.	Complete
18	Gaps in support	I also recommend that the ICGS team in reviewing and streamlining the process and documentation, review the letters and communications sent to complainants and respondents to give clarity about confidentiality and where support can be sought, using more accessible, consistent language than the somewhat legalistic tone currently used.	Complete
19	Gaps in support	In respect of complaints by staff against managers or another member of staff, I recommend that the Decision-Making Bodies, as employers ensure that any reasonable concerns of the complainant about continuing to work with the respondent during this period, together with the context, are taken into account and appropriate action promptly taken.	In progress
20	Factors undermining confidence	I recommend that the employers in both Houses together consider and agree a method of communicating that there have been consequences of upheld ICGS complaints in disciplinary proceedings, without breaching confidentiality or allowing individuals to be identified.	Complete
21			Complete

	Factors undermining confidence	In order to ensure support is available I would recommend that Members' Services trial for six months an advice service for MPs' staff providing coaching or tactical advice in dealing with day to day employment issues. This would not include legal representation for an individual.	
22	ICGS team	Therefore, I recommend that an additional Deputy Director role is created to focus on operational and service delivery and continuous improvement. Also, that the roles and workflows are aligned to ensure effective delivery of a quality service.	In progress
23	Governance mechanism for change and ongoing review	<i>For full Recommendation see Table 2: Recommended Governance Mechanism for Change to the ICGS on page 54 of the ICGS 18 month review (para 212)</i> Add – waiting for Commons agreement on floor of House	In progress
24	Accessibility of the Scheme to all	Addressing these accessibility problems to the ICGS for staff with disabilities are key to ensuring the Scheme is open to all and that the support and complaints process are fair and equitable to all. I recommend that these problems are prioritised by the ICGS team working with the Diversity and Inclusion teams in each House and the Parliamentary Digital Service to produce a plan including if necessary an interim solution within a month to ensure that as early as possible accessibility is routinely available.	Complete
25	Accessibility of the Scheme to all	I also recommend that the ICGS consult with the WENS and the Diversity and Inclusion teams in each House on developing the range of materials, including video and visual, and support, such as a dedicated ICGS mental health first aider, to allow those with neurodivergent conditions to access the Scheme with confidence.	Complete
26	Accessibility of the Scheme to all	I recommend that the ICGS team audit the Scheme's intranet presence, to ensure that every entry point allows users to find the information they require as quickly as possible and that it is accurate and up to date. I also recommend that all ICGS material is as a matter of course tested for accessibility by those with disabilities.	Complete

27	Valuing Everyone training - Attendance	Building on the commitment they have already made to changing the culture, I recommend that the House of Commons take this opportunity to make a decision that all MPs attend the Valuing Everyone training on an ongoing basis. This mandating of themselves to do so will resend a clear and powerful message to the whole Parliamentary community and externally that they remain committed to an improved culture. This is seen as MPs valuing the Parliamentary community and continuing to take responsibility to establish the workplace culture of dignity and respect whether on the Parliamentary Estate or in constituency offices.	Not taken forward
28	Valuing Everyone training - Attendance	I also recommend that the decision sets a time period for completion, namely that those still to attend the training do so within three months from the date of my report and that future newly elected MPs attend within six months of their election.	Not taken forward
29	Valuing Everyone training - Attendance	I also recommend that both the Lords and Commons Administrations identify which of its staff have not yet attended the training, identifies, and resolves any accessibility issues or barriers and works with Challenge Consultancy to maximise their attendance.	Complete
30	Valuing Everyone training - Attendance	I recommend that the House of Commons commits to make attendance of Valuing Everyone training by MPs' staff mandatory with a target of 50% attendance to be achieved within a year of the publication of this report. I also recommend that new MPs' staff should have attended this training at the latest within six months of starting employment and that it should be made a priority for their induction. I recommend that House of Commons L&OD send regular reminders to MPs in existing communications to support and enable their staff to attend, noting the flexibility of online training alongside face-to-face.	Not taken forward
31	Improving and refreshing Valuing Everyone training	As the Valuing Everyone training is an essential component of Parliament's commitment to an improved workplace culture, I recommend that the training should be retaken on a regular basis by all members of the Parliamentary Community, at a minimum every three years and that the training itself should take account of user feedback and include tools and examples of how to challenge poor behaviour and model good behaviour. I also recommend that the training should continue to align itself with wider cultural change and diversity and inclusion work.	In Progress

32	Third party reporting	For the reasons set out above I recommend that it should continue to be the position across both Houses that third parties cannot formally report behaviour under the ICGS policies and procedures. I note that equipping staff and managers with the skills and confidence to constructively challenge poor behaviour in the moment is being addressed in both the Valuing Everyone training, in the training on strengthening of leadership and management capability and practice across the Parliamentary Community and cultural initiatives such as Everyone Has a Voice in the House of Commons.	Complete
33	Cluster reporting	Given the challenges, I would recommend that the bicameral working group is set up to consider how cluster reporting would operate fairly and effectively in practice. In particular to consider how a fair and data protected complainant reporting procedure can be operated for collecting and storing the data and informing other potential complainants if a complaint is made. Also, to review if and how other organisations deal with a cluster of complaints informally as well as through a formal complaints' procedure.	In Progress
34	Cluster reporting	I would also recommend that the ICGS team agree the data they are collecting, including that of protected characteristics and other diverse groups and obtain from the ICGS Helpline analysis to identify hotspots, including by department and catering outlet to identify trends, always ensuring that the data is anonymised so that individual complainants cannot be identified. The frequency of the analysis to be agreed to give the most meaningful picture.	Complete
35	Limitation period for non-recent cases	I would propose that no time limit is imposed on non-recent at this moment for sexual misconduct but that the House of Commons Commission and the House of Lords Commission should consider this issue in 3 years' time, taking into account the original policy intent of the House in permitting non-recent cases and the number and pattern of complaints that have been made.	Complete
36		On complaints of bullying and harassment if Parliament do wish to implement a time limit on non-recent cases I would propose 2 years from the date of the incident(s) or behaviour complained of,	Complete (1 year

	<p>Limitation period for non-recent cases</p>	<p>with the exact detail of the operation of the time limit to be determined. To avoid the risk of unfair retrospective impact, a period of 1 year from the date of decision on the limitation period, within which any remaining non-recent claims can be made, whenever they occurred.</p> <p>Alternatively, the current position could be continued for a period of five years from its introduction in October 2019 and the question of time limits on both sexual misconduct and bullying and harassment considered then, taking into account 90 House of Lords, Code of Conduct for Members of the House of Lords Guide to the Code of Conduct Code of Conduct for House of Lords Members' Staff, (HL 99; July 2020), para 128 and para 5. 75 the original policy intent of the House and the number and pattern of complaints made.</p>	<p>time limit, not 2)</p>
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Annex C: Glossary of commonly used ICGS Terms

The aim of this guide is to ensure the ICGS is accessible to everyone. We have created this aid to provide an explanation for words and terms we frequently use. These are not legal definitions.

Commonly used ICGS terms

Aggravating factors

An aggravating factor is a behaviour that increases the severity of an action

Alison Stanley 6-month and 18-month review

To assess the work of the ICGS, two reviews of the Scheme were carried out by an independent reviewer Alison Stanley CBE FCIPD, in 2019 and in 2021

Allegations

The wording of the complaint that you have made will be put into allegations by the investigator and you will be asked to sign that the wording is correct if your complaint goes to a formal assessment.

Appeal

This is the process where people who have complained and people who have been complained about can request a formal change to an official decision following the completion of an ICGS Investigation, only if the Decision-Making Body for the respondent has an appeals policy and procedure.

The only rights of appeal are in cases involving MPs where decisions made by the PCS can be appealed to the IEP and in cases involving Members of the House of Lords in which an appeal can be put to the Conduct Committee.

There are no appeals in cases where the respondent is employed by the House of Commons, PDS, or the House of Lords. Not all decisions may be appealed. An appeal should not be confused with a review which examines the application of the process rather than the outcome of the case (see section on 'Review' further down)

Balance of Probabilities

The balance of probability standard is applied when an investigator is satisfied that, based on the evidence available, the occurrence of the event was more likely to have happened than not and that the alleged behaviours displayed constitute bullying or harassment or sexual misconduct.

Behaviour Code

The Behaviour Code makes clear the standards of behaviour expected of everyone, past or present, in the parliamentary community.

Bullying

Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour involving an abuse or misuse of power that can make a person feel vulnerable, upset, undermined, humiliated, denigrated or threatened. Power does not always mean being in a position of authority and can include both personal strength and the power to coerce through fear or intimidation. A full definition of bullying is available by speaking to the ICGS Helpline or in the ICGS Bullying and Harassment policy.

Code of Conduct (Commons)

The Code of Conduct for Members sets out the standards of behaviour expected of Members of Parliament (MPs) as they carry out their work.

Code of Conduct (Lords)

The Code of Conduct provides members of the House of Lords with guidance on the standards of conduct expected of them in performing their parliamentary duties.

Complaint

After speaking to the ICGS Helpline (or the Lords Commissioners), members of the Parliamentary community can choose to make a formal complaint about behaviour they have experienced so that it might be investigated independently. A complaint begins only when the details of the behaviour are made in writing, with support from the ICGS Helpline, using a standardised template called the disclosure form.

Complainant

This is an individual who reports or makes a complaint of bullying, harassment or sexual misconduct.

Collective Complaint

If there is more than one complaint about the same person, with agreement from all those making the complaints, the complaints can be assessed together usually by one investigator.

Decision-making bodies (DMB)

This is the person or body responsible for decision what action to take if a complaint is upheld. So, for example, if the respondent is employed by either House, the DMB would normally be the Commons or Lords HR department. If the respondent is an MP, the DMB will be the Parliamentary Commissioner for Standards or (potentially) the Independent Expert Panel. To find out who the relevant decision-making body is, contact the ICGS Helpline.

Disclosure form

If you decide to make a formal complaint, the Helpline (or in some cases, the Lords Commissioners) will record the details of the complaint in the disclosure form. The form will be used by the ICGS team to allocate an external independent investigator. The Lords Commissioners will use the form themselves and will allocate an external independent investigator to help them with the investigation.

Individual Assistance Programme (IAP)

A confidential support service for employees of both Houses and PDS, as well as Members of both Houses and Members' staff. The service may be able to help you with health and wellbeing information and stress at work. It can also be used by former members of the parliamentary community involved in ICGS cases.

Equality Act 2010

The Equality Act 2010 protects people from discrimination in the workplace and in certain other contexts (for example in the provision of goods and services). It prohibits discrimination based on nine "protected characteristics" which are –

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

The Act protects people from direct and indirect discrimination, as well as from harassment and victimisation.

Evidence

Any information which can be used by the independent investigator to determine whether a complaint should go to a full/formal assessment and, at a later stage, to determine whether the complaint is upheld. Evidence comes in many forms, it may be written or taken from any meetings with both parties and witnesses, as well as other relevant documentation including e-mails, social media posts and other correspondence.

Factual Accuracy Check

A step during an investigation of a complaint, when complainants and respondents can review the draft report produced by an independent investigator. Both parties can use this opportunity to ensure that facts and dates are correct and to request corrections, to raise concerns if relevant evidence has not been considered or relevant witnesses not interviewed, or to raise other concerns about the process of the investigation. The investigator then decides what (if any) changes should be made to the draft report.

Full Assessment

A step during an investigation of a complaint where the investigator will gather detailed evidence from the complainant, the respondent and any witnesses, as well as other relevant evidence. This will usually involve holding meetings with those involved, as well as requesting written evidence. The independent investigator will then produce a draft report, which will be sent to both parties for a factual accuracy check. Once this is completed, the investigator will produce a final report and

will send this to the complainant and the decision-making body for the respondent. This step may be different for cases involving the Parliamentary Commissioner for Standards or the Lords Commissioners for Standards.

Harassment

Harassment is any unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A full definition of harassment is available by speaking to the ICGS Helpline or in the ICGS Bullying and Harassment Policy.

House of Lords Conduct Committee

The Committee reviews and oversees the Codes of Conduct for Members of the House of Lords and Members' staff, and the work of the Lords Commissioners for Standards. The Committee considers appeals in cases under the Codes, following a finding of the Commissioners for Standards.

ICGS Helpline

In most cases, this is the first step if you are experiencing bullying, harassment or sexual misconduct and want advice/support. You can also phone the Helpline to get advice for someone else or are looking for more information.

You can contact the Helpline by phone or e-mail. When you contact the Helpline, an expert advisor can support you by talking through your experiences. They can then guide you through options for dealing with the behaviour, including making a formal complaint. These conversations are completely confidential. The ICGS Helpline is run by an independent charity, Victim Support.

ICGS Hub

An online SharePoint site featuring the information and guidance you need to understand how the ICGS works and what support is available to you.

ICGS Stakeholder Forum

Meeting monthly to discuss latest developments, and to provide guidance and challenge to the ICGS team, the ICGS Stakeholder Forum is made up of representatives from across the parliamentary community, including Decision-Making Bodies, Trade Unions and House staff with responsibility for ICGS-related work.

ICGS Team

The bicameral team responsible for the ICGS, liaising with investigators, complainants, and respondents, and implementing improvements to the Scheme.

Independent Expert Panel (IEP) House of Commons

In cases involving an MP, or former MP, as the respondent the Independent Expert Panel hears appeals by the complainant or respondent against decisions made by the Parliamentary Commissioner for Standards, and determines sanctions in cases referred to the Panel by the Commissioner.

Independent Investigator

If you decide to make a formal complaint, it will be allocated to an independent investigator (unless your complaint is being handled by the Lords Commissioners). Independent investigators are responsible for undertaking key stages in the investigation of a complaint, including initial assessment, formal assessment and factual accuracy checks. For cases where the respondent is a Member in the House of Lords, the Lords Commissioner will investigate the case, with the help of one of these independent investigators.

Independent Sexual Misconduct Advisor (ISMA)

We offer additional support to anyone who reports experiences of sexual misconduct in Parliament. When contacting the Helpline, those complainants can be connected with an ISMA, who is a trained Independent Sexual Misconduct Adviser and can guide them throughout the process.

Informal Resolution

Many cases can be resolved through informal, alternative resolution, without the need for a formal investigation. Informal resolution can include facilitated conversations, brokered written communications between both parties, or conversations supported by an appropriate third party. The outcomes of informal resolution are often the same as the outcomes of a formal investigation and can include an apology from the respondent, an agreed behaviour contract for working together, training and mediation.

Initial Assessment

Before a complaint goes to a formal investigation, the independent investigator needs to check whether your complaint meets the conditions for it to progress to a full investigation. During the initial assessment, they will establish whether the complaint meets certain criteria, including whether it is eligible under the bullying and harassment or sexual misconduct policy or if it has been already investigated elsewhere. Their decision will be sent to the complainant in writing. They will also identify any witnesses the complainant is hoping to involve and what a satisfactory outcome would be for them (including informal resolution).

Lords Commissioners for Standards

The House of Lords Commissioners for Standards are responsible for the independent and impartial investigation of alleged breaches of the House of Lords Codes of Conduct for Members of the Lords and Members' staff.

Mitigating factors

Mitigating factors are any circumstances which may reduce a respondent's blameworthiness for a finding of misconduct in an ICGS case. For example, an independent investigator may find that a respondent's actions were attributable (wholly or in part) to mental health factors or a medical condition. This could result in the DMB imposing a lesser sanction.

Parliamentary Commissioner for Standards (PCS) (Commons)

The PCS has oversight of investigations conducted in an ICGS case where an MP or former MP is the respondent. The Commissioner is also the primary Decision-Making Body for investigations conducted under the Scheme, although it is the IEP which imposes sanctions in more serious cases.

Parliamentary Community

The Parliamentary Community means people who work for or with Parliament, in particular staff of the House of Commons and House of Lords, Parliamentary Digital Service staff, Members of both Houses, their staff, and certain contractors. “Staff” includes self-employed individuals as well as employees, and interns and other paid or unpaid staff.

Pathway 2

If you are experiencing sexual misconduct you may choose to resolve the matter through informal resolution at any point after contacting the ICGS Helpline. Informal resolution of sexual misconduct cases is referred to as Pathway 2 in the Sexual Misconduct Policies and Procedures.

Policies

There are two policies that support complainants and respondents—the [Bullying and Harassment Policy](#) and the [Sexual Misconduct Policy](#). Both documents set out who the ICGS applies to, the types of behaviour covered.

Procedures

There are two procedures that support complainants and respondents—the Bullying and Harassment Procedure and the Sexual Misconduct Procedure. Both documents outline how complaints are dealt with in the ICGS.

Respondent

This is an individual who is accused of bullying, harassment or sexual misconduct.

Sanctions

If a complaint is upheld, the formal assessment report will be sent to the Decision-Making Body who may impose sanctions. For employees of the two Houses, the types of sanction applied can include a letter or apology, a requirement to complete training, formal warning, or dismissal. For Members of either House, sanctions can include an apology to the House, a requirement to complete training, or suspension or expulsion from either House.

Sexual Misconduct

Sexual misconduct describes a range of behaviours including sexual assault, sexual harassment, stalking, voyeurism and any other conduct of a sexual nature that is non-consensual or has the purpose or effect of threatening, intimidating, undermining, humiliating or coercing a person. A full definition of bullying is available in the ICGS Sexual Misconduct Policy or by speaking to the ICGS Helpline.

Statement of Complaint

The Statement of Complaint is written by the investigator, checked by the ICGS Liaison team and then signed by the complainant and is for the complainant only. It contains both the allegations that are being taken forward and any that are not being taken forward.

Summary Initial Assessment

The summary initial assessment is for the respondent only and outlines the allegations that are being taken forward against them. It also discusses the possibility of informal resolution. This is what the DMB uses to inform the respondent of the complaint

Victimisation

When the person making a complaint, a witness, or someone supporting either the complainant or any witnesses, is treated unfavourably by the respondent as a result of their involvement. If victimisation is uncovered during the course of an investigation, it will be taken seriously and may be considered to be an aggravating factor if the case is upheld.

Vexatious complaint

A complaint brought without any proper basis. If an investigator concludes that the complaint is malicious, vexatious or deliberately false, the DMB for the complainant may invoke its relevant policies and procedures against him or her.

Upheld

Once a complaint has been fully investigated, the independent investigator will produce a report outlining whether, on the balance of probabilities, the behaviour occurred, using the evidence and considering the impact on the complainant.