



BRIEFING PAPER

Number 08369, 27 April 2021

Independent Complaints and Grievance Scheme

By Richard Kelly

Contents:

1. Independent Complaints and Grievance Scheme
2. Independent Complaints and Grievance Policy: Delivery Report
3. Background to the Delivery Report
4. Independent Inquiry into bullying and harassment of House of Commons Staff (Cox Report)
5. Dame Laura Cox's Inquiry Report
6. Response to the Cox Report
7. Work on Dame Laura Cox's key recommendations
8. Implications of the Cox Report for the House's standards system
9. Other inquiries and other developments



Contents

Summary	4
Independent Complaints and Grievance Scheme	4
Independent Complaints and Grievance Policy: Delivery Report	6
Background	7
Independent Inquiry into bullying and harassment of House of Commons Staff	7
1. Independent Complaints and Grievance Scheme	10
1.1 Publishing information about investigations	12
1.2 Committee on Standards and the ICGS appeals process	14
Sanctions	15
1.3 ICGS in the House of Lords.	16
1.4 Six-month and 18-month reviews of the ICGS	18
Six-month review of the ICGS	18
Response to the six-month review	20
18-month review of the ICGS	21
Subsequent revisions to the ICGS	22
1.5 Gemma White’s comments on the operation of the ICGS	23
1.6 ICGS statistics	23
2. Independent Complaints and Grievance Policy: Delivery Report	25
2.1 The Report	25
Application of the Independent Complaints and Grievance Policy	26
2.2 Committee on Standards’ views on implementing the Independent Complaints and Grievance Policy	27
2.3 Reaction to the Delivery Report	29
Before publication	29
After publication	29
3. Background to the Delivery Report	31
4. Independent Inquiry into bullying and harassment of House of Commons Staff (Cox Report)	32
5. Dame Laura Cox’s Inquiry Report	34
5.1 Introduction	34
5.2 Existing policies	34
5.3 Independent Complaints and Grievance Policy	35
Confidentiality	36
Ownership	36
Dealing with the past	36
Oversight of the scheme	37
5.4 Culture change	39
6. Response to the Cox Report	41
6.1 Urgent Question on Dame Laura Cox’s Report	41
6.2 Management Response	41
6.3 Outcome of the House of Commons Commission meeting on the Report	42
6.4 Debate on the Cox Report	44
7. Work on Dame Laura Cox’s key recommendations	45
7.1 Historical allegations	45
Commission proposals agreed	47
7.2 An entirely independent process	48
Establishment of the Independent Expert Panel	49

Appointment of the Independent Expert Panel	50
Information on the Independent Expert Panel	50
7.3 Debate on progress of implementation of the recommendations of the Cox Report	50
8. Implications of the Cox Report for the House's standards system	52
8.1 Standards Committee: initial proposals	52
8.2 Debate on the initial proposals	53
9. Other inquiries and other developments	54
9.1 House of Commons Members' staff	54
Inquiry by Gemma White QC	54
Gemma White's report	54
Debate on Gemma White's Report, 17 July 2019	56
HR support for Members' staff	56
9.2 House of Lords	57
Naomi Ellenbogen's report	57
9.3 Cultural transformation	58
9.4 ICGS costs	58

Summary

Independent Complaints and Grievance Scheme

On 19 July 2018, the House of Commons [endorsed](#) the Behaviour Code and the policies and procedures relating to bullying and harassment and sexual harassment set out in the Independent Complaints and Grievance Scheme (ICGS) Delivery Report, which was published on 17 July.

It agreed to incorporate, in the [Code of Conduct](#), the expectation that Members observe the principles of the Behaviour Code. And a new rule was added to the Code: “A Member must treat their staff and all those visiting or working for or with Parliament with dignity, courtesy and respect”.

Changes were made to Standing Orders but more recent changes including the establishment of the Independent Expert Panel to determine sanctions and appeals relating to MPs; and giving lay members of the Committee on Standards full voting rights mean that some of those initial changes have been superseded.

In July 2018, the House agreed that, “to ensure complaints are handled confidentially”, “for consistency and fairness, the Parliamentary Commissioner for Standards (PCS) should no longer routinely publish information about individual investigations before those investigations are concluded”.

The House divided on whether to apply confidentiality to all investigations undertaken by the PCS. Sir Kevin Barron, the Chair of the Committee on Standards, moved an amendment to continue the existing practice, for non-ICGS matters, whereby those under investigation were identified. The House voted down the amendment, and later in the day a list of MPs under investigation was removed from the Commissioner’s webpages. Sir Kevin subsequently announced his resignation as the Chair of the Committee. The decision was [reversed](#) for non-ICGS cases on 21 April 2021.

The House agreed to establish a further independent inquiry, in similar terms to Dame Laura Cox QC’s inquiry (relating to House staff), to consider allegations of bullying and harassment in respect of those not covered by Dame Laura Cox’s inquiry, including MPs and their staff. This inquiry was conducted by Gemma White QC. Her [report](#) was published on 11 July 2019.

The House endorsed the proposal for reviews of the Scheme after six and 18 months. The reviews would take into account the findings of the two inquiries into bullying and harassment. The costs of the new inquiry and the reviews would be met from the House’s Administration budget. Both the six-month and 18-month reviews were conducted by Alison Stanley (see below).

The new [Behaviour Code](#) was published and is now displayed widely across the parliamentary Estate. A [brochure](#) [intranet link] has also been published. It explains the Code and the accompanying policies and complaints and support processes.

Appeals

On 13 March 2019, the Committee on Standards [set out](#) its interim role in ICGS appeals relating to complaints of bullying and harassment, and sexual misconduct, by MPs. It decided to delegate decision-making on appeals and cases referred by the Parliamentary Commissioner for Standards to an Appeals Sub-Committee, with a majority of lay members. In its report, the Committee outlined the framework for appeals.

Following a [decision of the House](#) on 23 June 2020, such appeals will now be considered by an [Independent Expert Panel](#).

Six-month review of the ICGS

On 28 January 2019, [Alison Stanley](#) was [appointed](#) by the House of Commons Commission to review of the first six months of the operation of the ICGS. Her [report](#) was published on 12 June 2019.

Her key recommendations related to:

- ensuring continued focus, drive and coherence of the Scheme, by identifying the key accountabilities of senior leaders across the Parliamentary community;
- creating a fully resourced bicameral ICGS team, with the requisite skills and experience to ensure effective implementation and streamlined operation;
- a new dedicated approach to communication of the ICGS accessible to all and focused on each user group within the Parliamentary community clearly setting out the end-to-end processes;
- proactively using the Behaviour Code to improve ways of working in teams, for example as part of the wider cultural work being led by Julie Harding, the new Independent Director of Cultural Transformation in the House of Commons;
- building on the solid start on the training programme, ensuring the equal importance of training for all members of the Parliamentary community is addressed.

18-month review of the ICGS and revisions to the Scheme

Alison Stanley was also appointed to undertake the 18-month review of the ICGS. Her review [began](#) in October 2020; and [it was published](#) on 22 February 2021. In her executive summary, Alison Stanley commented that:

... while there has been much progress, it has become plain that several aspects of how the ICGS is operating are impacting on the success of the Scheme and the confidence in it. Its operation and processes have become over complex and there is a perception amongst the Parliamentary community that it is a stressful, isolated and lengthy process. This has been the experience of many of the contributors to the review, in particular during an investigation. Some groups are less likely to use the Scheme for confidential support and advice or to make a claim.

The House of Commons Commission considered the 18-month review. At its meeting on 22 March 2021, the Commission endorsed proposals for textual changes to the policies and procedures concerning complaints of bullying and harassment or sexual misconduct, in response to Alison Stanley's report. It also endorsed other changes recommended by staff for clarification and updating of the documents.

On 22 April 2021, the Commission published a report entitled [*Amendments to independent Complaints and Grievance Scheme*](#), which the House of Commons will consider on 28 April 2021. The revised policies and procedures, agreed by the Commission in March, are annexed to this report.

Scheme expanded to include historic cases

On 17 July 2019, the House of Commons amended the Independent Complaints and Grievance Scheme to allow historic (non-recent) cases to be within the scope of the Scheme. The House [endorsed](#):

... the report of the House of Commons Commission entitled Extending the Independent Complaints and Grievance Scheme (HC 2554) and laid on Monday 15 July and approves the steps set out in paragraph 8 of the report to make the changes necessary to extend the scheme, endorsed under the resolution of 19 July 2018.

[Extending the Independent Complaints and Grievance Scheme](#) was published following the Commission's meeting on 15 July 2019. Paragraph 8 of the report proposed the following changes to the ICGS:

- a. Replace Section 5.3 of the Bullying and Harassment Policy with "Complaints predating the start of the 2017 Parliament can also be investigated under this policy and will be assessed using the current accepted behaviour regime.";
- b. Replace Section 15.2 of the Sexual Misconduct Policy with "All members of the present and past Parliamentary Community as set out in section 9 (Scope) of the Sexual Misconduct Policy can access the ISMA Service for advice and support";
- c. Replace Section 15.3 of the Sexual Misconduct Policy with "People who have concerns about behaviour prior to the start date of the 2017 Parliament can raise a complaint using the current scheme";
- d. In the Bullying and Harassment Policy, in para 4.1, replace "any member" with "any present or former member", in para 4.2, replace "all those working for or with" with "all those who have worked for or with or who are currently working for or with".

The Commission's report recognised that "none of the proposals in this paper will apply to staff of the House of Lords Administration or to Members of the House of Lords or their staff, until the appropriate Lords authorities agree to these or similar arrangements".

Following a [report](#) from the Conduct Committee, the House of Lords [agreed](#) arrangements for the investigation of older cases, on 16 March 2020.

In the autumn of 2020, the [Committee on Standards](#) and the Lords [Conduct Committee](#) set out procedures for dealing with cases relating to former members of the other House. The House of Lords [approved](#) the proposals on 3 November. The Commons [approved](#) them on 25 November.

Independent Complaints and Grievance Policy: Delivery Report

On 17 July 2018, the Independent Complaints and Grievance Policy (IGCP) Programme Team's [Delivery Report](#) was published. It set out how the Programme Team, overseen by a steering group, had taken forward the House's decision of 28 February 2018 to implement recommendations to develop a parliament-wide behaviour code and independent complaints and grievance schemes to respond to and manage complaints of (i) sexual harassment and (ii) bullying and harassment.

The Delivery Report included a proposed Behaviour Code; procedures for reporting and investigating allegations of bullying and harassment; procedures for reporting and investigating allegations of sexual harassment; and a system of training to support the Behaviour Code. The Delivery Report set out steps that had been taken to ensure that a human resources support service was available for staff of MPs. It set out the role of the Parliamentary Commissioner for Standards and the Committee on Standards in investigating complaints about Members of Parliament. Before the Delivery Report was published the Steering Group had asked the Committee on Standards for comments – the Committee's comments are taken into account. The Delivery Report confirmed that "The Steering Group has agreed that the new Scheme can investigate incidents that occurred from the start of this Parliament (June 2017)". However, the Delivery Report also noted that "The Steering Group are determined that the new Scheme is not a 'day zero' approach that ignores the problems of the past". The Delivery Report "set out the options available to complainants to pursue a route that offers the best chance to deliver what they need to find resolution" – these noted that some pre-2017 complaints might be taken into account if they constitute "continuing acts". Complainants bringing forward older cases that were not continuing "will be able to talk through the details with an

independent adviser and be pointed in the direction of where they can get support and counselling services". Any decision on investigation would be based on the policy or code in place at the time.

The Delivery Report set out the scope of reviews, recommended by the Working Group, that should take place six and 18 months after the Scheme's introduction.

In a message to House of Commons staff, following the publication of the Delivery Report, the Clerk of the House stated that if the report was agreed to by the House, the Policy would be applied to House staff.

Background

In November 2017, allegations and accounts in the press of inappropriate behaviour and a culture of bullying and sexual harassment at Westminster led to the establishment of a cross-party Working Group on an Independent Complaints and Grievance Policy. The Working Group reported in February 2018. It recommended the development of a parliament-wide behaviour code and independent complaints and grievance schemes to respond to and manage complaints of (i) sexual harassment and (ii) bullying and harassment.

At the end of February, the House of Commons agreed a motion endorsing the Working Group's recommendations and asking the House of Commons Commission to authorise officials to undertake the work to implement those recommendations. The House also agreed that the Working Group should reconvene as a Steering Group and that the officials working on the Independent Complaints and Grievance Policy should report to the Steering Group.

Independent Inquiry into bullying and harassment of House of Commons Staff

Complaints about the behaviour of Members towards staff of the House were reported by Newsnight in March 2018. Following the first Newsnight report, the House of Commons Commission agreed to establish an independent inquiry into Bullying of Staff in the House of Commons. That inquiry was undertaken by Dame Laura Cox.

Dame Laura Cox's [report](#) was published on 15 October 2018.

An [Urgent Question](#) was asked on 16 October 2018.

On 24 October 2018, the House of Commons Commission met to consider Dame Laura's report. In a [statement](#), the Commission thanked Dame Laura for her report; acknowledged its statutory responsibility "for the employment of House staff and have too often failed to honour the responsibility to provide a workplace free from bullying and harassment"; and expressed its determination to rectify past mistakes. The Commission agreed to the three fundamental recommendations highlighted by Dame Laura:

1. We are terminating the Valuing Others Policy, and have suspended operation of the Respect Policy recommending that the House terminate it as soon as possible;
2. We recommend that the House amend the new Independent Complaints and Grievance Scheme to ensure that those House employees with complaints involving historical allegations can access the new Scheme;
3. We recommend that the House consider the most effective way to ensure 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.

The Commission confirmed that it was “up to the House to take forward these recommendations to which we are fully committed”.

On 5 November 2018, the House held a [general debate](#) on Dame Laura Cox’s report.

On 10 December 2018, the Committee on Standards’ report, [Implications of the Dame Laura Cox report for the House’s standards system: Initial proposals](#), was published. The Committee made recommendations to allow the Committee lay members to have formal votes, and to allow the Parliamentary Commissioner for Standards to initiate an inquiry into either a former Member or a matter which goes back more than seven years, without permission from the Committee. The Committee argued that these recommendations would enhance the independence of both the Committee and the Commissioner. However, it accepted these were interim arrangements and until the ICGS was amended it would continue to be have a role in appeals from Members.

The Committee’s report was [debated](#) and agreed to by the House on 7 January 2019.

Work on Dame Laura Cox’s recommendations

On 18 June 2019, Maria Miller led a Backbench Business [debate](#) on the progress of implementing the recommendations of the Cox Report. She [expressed concern](#) that the House of Commons Commission had not put in place “changes demanded by [Dame Laura] Cox eight months ago”.

Mel Stride, the then Leader of the House, [acknowledged](#) that “while we have not moved fast enough and I accept that, we should not overlook the progress that we have made”.

The House [resolved](#) that:

That this House welcomes the publication of, and recommendations in, the Dame Laura Cox report on bullying and harassment in Parliament; welcomes the implementation of the recommendation to abandon the Valuing Others and Respect policies; expresses concern about damage caused to the reputation and standing of this House by the lack of progress made on other recommendations on historical allegations and the non-involvement of MPs in Independent Complaints and Grievance Scheme cases; and calls on the Leader of the House and the House of Commons Commission to push forward the implementation of all three key recommendations in full without delay.

Historical allegations: A [consultation](#) on incorporating the investigation and subsequent sanction, if necessary, of non-recent cases into the ICGS was launched on 21 May 2019. The consultation closed on 14 June 2019.

At its meeting on 24 June 2019, the House of Commons Commission [agreed](#) to include non-recent cases in the ICGS. It issued a [statement](#), confirming that “Subject to approval by the House, implementation work will take place over the summer, including the recruitment of a bank of additional expert independent investigators, with the intention of opening up the Scheme to non-recent cases from October this year”.

On 11 July 2019, the Leader of the House [said](#) that the Government was “bringing forward a motion that will implement the important recommendation in Dame Laura Cox’s report that historic cases should be in scope as part of the independent complaints and grievance scheme”. He [announced](#) that the debate would take place on 17 July 2019. The motion for this debate was agreed to and the changes to the Scheme, set out in a report from the Commission, are noted above.

Independent process: The House of Commons Commission considered how to take forward this recommendation at a number of meetings. On 10 June 2019, it was [announced](#) that a staff team would be created to lead on producing options on implementation for the Commission.

The Commission received a number of options from the staff team. At its meeting on 10 February 2020, it [agreed](#) its preferred option for implementing the recommendation, which would involve the setting up of a new independent panel of experts with the power to determine ICGS cases and decide on sanctions; and agreed that [formal consultation](#) on the selected preferred option be undertaken.

At its meeting on 27 April 2020, the Commission [confirmed](#) that it wanted to see its preferred option implemented. The House would need to agree to the establishment of the independent expert panel and would be asked to consider whether, once established, the panel's findings involving sanctions would need to be debated in the House. The panel would not include current or former Members. It would adopt the Committee on Standards' appeals framework.

On 23 June 2020, the House [agreed](#) to the establishment of an Independent Expert Panel to consider cases against MPs raised under the Independent Complaints and Grievance Scheme. It agreed to the functions and responsibilities of the Panel, the method of appointing the Panel and made consequent changes to Standing Orders. The House also agreed an amendment to ensure that any decisions relating to recommendations made by the Panel that needed to be ratified by the House should be decided without debate in the Chamber.

The House of Commons will be asked to [agreed appointments to the Panel](#) on 25 November 2020.

[Information about the Panel](#), including its membership; procedures and guidance; reports; and correspondence, can be found on the parliamentary website.

1. Independent Complaints and Grievance Scheme

Parliament's Independent Complaints and Grievance Scheme consists of the Behaviour Code, the Bullying and Harassment Policy, and the Sexual Misconduct Policy, which have been in place since July 2018.

Since early July 2020, a single helpline has been available for all ICGS enquiries.¹

User guides have been prepared for both [complainants](#) and [respondents](#).

The independent services, run by external specialist organisations, are available to all members of the parliamentary community. The parliamentary community includes staff of the House of Commons, staff of the House of Lords Administration, staff of the Parliamentary Digital Service, Members of both Houses, their staff and contractors. Visitors to Parliament can also make a complaint under the ICGS.

On 19 July 2018, the House of Commons debated the Committee on Standards' report on the Independent Complaints and Grievance Policy and the Independent Complaints and Grievance Scheme (ICGS) Delivery Report. It approved both reports.² The Committee on Standards' report was published on 13 July (see section 2.2); and the Delivery Report was published on 17 July (see section 2.1).³

The House endorsed the Behaviour Code (see Box 1) and the policies and procedures relating to bullying and harassment and sexual harassment associated with the Independent Complaints and Grievance Scheme set out in the Delivery Report.

Box 1: Behaviour Code

Whether you are a visitor or working in Parliament at Westminster or elsewhere, there are clear guidelines in place on how you should be treated, and how you should treat others:

- Respect and value everyone – bullying, harassment and sexual misconduct are not tolerated
- Recognise your power, influence or authority and don't abuse them
- Think about how your behaviour affects others and strive to understand their perspective
- Act professionally towards others
- Ensure Parliament meets the highest ethical standards of integrity, courtesy and mutual respect
- Speak up about any unacceptable behaviour you see

Unacceptable behaviour will be dealt with seriously, independently and with effective sanctions

The House agreed to incorporate the Parliamentary Behaviour Code and a new rule that "a Member must treat their staff and all those visiting or working for or with Parliament with dignity, courtesy and respect", in

¹ Until early July 2020, two helplines were in place: the Independent Bullying and Harassment Helpline; and the Independent Sexual Misconduct Service

² [HC Deb 19 July 2018 cc627-660](#)

³ Committee on Standards, [Independent Complaints and Grievance Policy: Implementation](#), 13 July 2018, HC 1396 2017-19; Independent Complaints and Grievance Policy (IGCP) Programme Team, [Independent Complaints and Grievance Scheme Delivery Report](#), July 2018

the Code of Conduct. An updated version of the Code of Conduct was published on 1 August 2018.⁴

It agreed changes to Standing Orders. Lay members of the Committee on Standards were given indicative votes and the Parliamentary Commissioner for Standards (PCS) was given the duty “to consider cases arising from the Independent Complaints and Grievance Scheme” and the power to rectify such cases. More recent changes including the establishment of the Independent Expert Panel to determine sanctions and appeals relating to MPs; and giving lay members of the Committee on Standards full voting rights mean those initial changes have been superseded.

The House agreed that, “to ensure complaints are handled confidentially”, “for consistency and fairness, the Parliamentary Commissioner for Standards (PCS) should no longer routinely publish information about individual investigations before those investigations are concluded”.

The House divided on whether to apply confidentiality to all investigations undertaken by the PCS. Sir Kevin Barron, the Chair of the Committee on Standards, moved an amendment to allow the existing practice whereby those under investigation were identified. The House voted down the amendment, by 79 votes to 22,⁵ and later in the day a list of MPs under investigation was removed from the Commissioner’s webpages. Sir Kevin subsequently announced his resignation as the Chair of the Committee.

The decision was [reversed](#) for non-ICGS cases on 21 April 2021.⁶ (See section 1.1 for more information on this.)

Dame Laura Cox QC has undertaken an inquiry into allegations of bullying and harassment of House of Commons staff (see section 5). The House agreed to establish a further independent inquiry in similar terms to consider allegations of bullying and harassment in respect of those individuals including MPs and their staff. The new inquiry was to report in time for its findings to be taken into account in the six-month review of the scheme.

The House endorsed the proposal for reviews of the Scheme after six and 18 months. The reviews would take into account the findings of the two inquiries into bullying and harassment. The costs of the new inquiry and the reviews would be met from the House’s Administration budget. (Alison Stanley’s six-month and 18-month reviews of the ICGS are discussed in section 1.4.)

The new Behaviour Code was published and is now displayed widely across the parliamentary Estate. A [brochure](#) [intranet only] has also been

The inquiry, by Gemma White, into bullying and harassment of MPs’ staff was launched on 6 November 2018 and [reported](#) on 11 July 2019 (see section 9.1)

⁴ House of Commons, [Code of Conduct](#), 1 August 2018, HC 1474 2017-19. It was republished along with an updated guide to the rules in October 2019: House of Commons, [The Code of Conduct together with The Guide to the Rules relating to the Conduct of Members](#), 10 October 2019, HC 1882 2017-19

⁵ [HC Deb 19 July 2018 c658](#)

⁶ [HC Deb 21 April 2021 cc1074-1089](#)

published. It explains the Code and the accompanying policies and complaints and support processes.

1.1 Publishing information about investigations

Following a decision of the House of Commons, on 2 December 2010, the PCS routinely published the name of Members and the matter under investigation, when she initiated an investigation.⁷

In order to ensure the confidentiality of anyone under investigation and to protect complainants, under the new ICGS, the Government proposed, in the motion before the House on 19 July 2018, that the House:

recognises the role of the Parliamentary Commissioner for Standards to consider cases arising from the Independent Complaints and Grievance Scheme; notes the arrangements about publishing the details of investigations of such cases to ensure complaints are handled confidentially as set out in the Independent Complaints and Grievance Scheme Delivery Report; *and accordingly agrees that, for consistency and fairness, the Parliamentary Commissioner for Standards should no longer routinely publish information about individual investigations before those investigations are concluded and accordingly agrees to amend sub-paragraph (b) of paragraph (12) of Standing Order No. 150 by inserting "statistical" before "information" and leaving out "and matters under investigation";*

Sir Kevin Barron, the Chair of the Committee on Standards, moved an amendment (to remove the italicised text above) to allow the existing practice whereby those under investigation were identified. He noted that apart from this issue, "the Standards Committee is completely in accord with the steering group and its delivery report".⁸

He argued that the difficulty for the Committee arose from the proposal to extend confidentiality "to financial misconduct or the abuse of House facilities". He noted that the rules were agreed by the House in the wake of the expenses scandal, and "were seen then as an important way of demonstrating transparency and openness". He told the House that the Committee believed that "transparency and openness should continue to apply. There is no doubt that if the House votes for the Leader of the House's motion today without amendment, many people outside will criticise us for rolling back the openness that was agreed back in 2010 following the expenses scandal".⁹

In her opening remarks, before Sir Kevin spoke, Andrea Leadsom, then Leader of the House of Commons, who chaired the Steering Group argued that:

I would be the last person to want to avoid transparency, but for this scheme to succeed, it is vital that we achieve consistency. The amendment by the Committee on Standards would effectively

⁷ [HC Deb 2 December 2010 cc995-1016](#); Parliamentary Commissioner for Standards, *Annual Report 2010-11*, 6 July 2011, HC 1328 2010-12, para 1.7

⁸ [HC Deb 19 July 2018 c641](#)

⁹ *Ibid*, c 644

mean that there is one process for ICGP cases and a different one for non-ICGP cases.¹⁰

Caroline Lucas, a member of the Steering Group, noted that she had not agreed on this point. She told the Leader of the House that “Consistency is not the most important issue, and the optics of this House rolling back transparency are deeply worrying”.¹¹

In response to Ms Lucas’ intervention, Andrea Leadsom said:

I am incredibly grateful to the hon. Lady for her considerable efforts on this scheme but, very respectfully, I disagree with her on that point. She and I have had a number of conversations about the matter, and we have always been clear that the confidentiality at the heart of this policy must be observed so that a complainant will have the confidence to come forward. As I am sure Members will appreciate, a difference in process between ICGP and non-ICGP cases will be lost on those who observe it, which will inevitably lead to confusion. People will not think, “Oh well, this procedure must be for one issue, and that must be for another issue.” They will just see the naming of an individual, and that will have repercussions for those who want to come forward in confidence to a complaints procedure, feeling that their confidentiality will be upheld.¹²

In her concluding remarks, Andrea Leadsom thanked Sir Kevin and the Committee on Standards for its work. She noted that it had been difficult to convince the PCS on this matter and told the House that the decision not to name the subject of any investigation was being introduced temporarily:

I thank the right hon. Member for Rother Valley (Sir Kevin Barron) and his Committee for their work. It took me considerable time and effort, however, to persuade the Parliamentary Commissioner for Standards and the Standards Committee even of the need not to name people when opening investigations into all ICGP cases as well as non-ICGP cases. I have asked that we temporarily suspend naming people when opening investigations for the purpose of giving ourselves a clear run at this, even if we re-implement the PCS’s ability to name non-IGCP candidates after six months. I really urge Members not to accept the amendment. We need a clear run at this, so we need confidentiality and consistency.¹³

The House voted down the amendment, by 79 votes to 22,¹⁴ and later in the day a list of MPs under investigation was removed from the Commissioner’s webpages.

Sir Kevin informed the Committee on Standards of his resignation as Chair at its first meeting after the debate, on 4 September 2018.¹⁵

In June 2020, the Committee on Standards recommended that the Commissioner should again have the power to publish details of non-

¹⁰ [HC Deb 19 July 2018 c630](#)

¹¹ [HC Deb 19 July 2018 c630](#)

¹² [HC Deb 19 July 2018 c630](#)

¹³ [HC Deb 19 July 2018 c657](#)

¹⁴ [HC Deb 19 July 2018 c658](#)

¹⁵ Dulcie Lee, “Standards watchdog head Sir Kevin Barron resigns over cover-up fears”, *Times*, 5 September 2018; Sir Kevin Barron [tweeted](#) the announcement on 4 September 2018

ICGS cases. The Commissioner proposed four recommendations on publishing information (deterrents to unauthorised disclosure; the power to set the record straight; authority to publish a quarterly report about completed ICGS investigations; and publishing information about on-going non-ICGS cases).¹⁶ The Government support this position.¹⁷

Additionally, as a result of its discussions with the Government and the Commissioner since its June 2020 report, the Committee has also proposed that there should be a right of reply in cases where “significantly incorrect information about the allegation has been made public”. The Committee proposed that:

... the injured party (Member or complainant) should be able to apply to the Commissioner for a public rebuttal to be issued, either by the Commissioner herself or by the injured party with her express prior approval of the text. We would expect any such rebuttal to be factual and not argumentative in content, and as brief as possible. The response to any such application will be at the discretion of the Commissioner who will thereby keep control of the process.¹⁸

The Committee’s proposals were debated on 21 April 2021; and the House endorsed the Committee’s recommendations. It agreed to change the Standing Orders to allow the PCS to publish information about “matters under investigation”.¹⁹

1.2 Committee on Standards and the ICGS appeals process

Following the appointment of the Independent Expert Panel, the Committee on Standards no longer has a role in ICGS cases relating to MPs.

However, responsibility for appeals before the Panel was appointed would have fallen on the Committee. On 13 March 2019, the Committee on Standards set out its role in ICGS appeals.²⁰ It decided 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.²¹ The Committee agreed the composition of the Sub-Committee:

Standing Order No. 149 (6) provides that a formal sub-committee of the Committee on Standards must have at least three members, of which at least one should be a lay member and at least one an elected member; the quorum is three. We propose that the Appeals Sub-Committee should have five members, of which three will be lay members and two will be elected members. The Sub-Committee will have the right to choose its own Chair. We will decide in the light of experience whether the

On 23 June 2020, the House of Commons agreed to establish an independent panel to determine ICGS cases and decide on sanctions, in cases relating to MPs (see section 7.2).

¹⁶ Committee on Standards, [Confidentiality in the House’s standards system](#), 19 June 2020, HC 474 2019-21

¹⁷ Committee on Standards, [Sanctions and confidentiality in the House’s standards system: revised proposals](#), 30 March 2021, HC 1340 2019-21, para 11

¹⁸ *Ibid*, para 17

¹⁹ [HC Deb 21 April 2021 cc1074-1089](#)

²⁰ Committee on Standards, [The Committee’s role in ICGS appeals](#), 13 March 2019, HC 1976 2017-19

²¹ *Ibid*, para 13

Sub-Committee should have a standing membership or whether it should be constituted afresh in respect of each appeal.²²

Its role would be “to consider applications for ICGS appeals, to conduct appeals, and to take decisions on redaction to protect the anonymity of the complainant”. It would be responsible for ICGS appeals and “The full Committee will not in any circumstances challenge the decisions of the Sub-Committee, but will agree without debate to any request by the Sub-Committee to approve its findings or to publish reports or evidence”. A formal resolution to this effect would be agreed by the Committee.²³

The Committee on Standards appointed a Sub-Committee on ICGS Matters on 14 May 2019. It was given responsibility for considering applications for and then hearing appeals. The Committee’s decisions are set out in Box 2.

Box 2: Decisions of the Committee on Standards on ICGS appeals

At its meeting on 14 May 2019, the Committee:

Resolved, That a Sub-Committee on ICGS Matters be appointed to consider applications for Independent Complaints and Grievance Scheme (ICGS) appeals, to conduct such appeals, and to take decisions on redaction to protect the anonymity of the complainant, as well as on other responsibilities of the Committee relating to ICGS appeals, and those relating to ICGS cases escalated to the Committee by the Parliamentary Commissioner for Standards.

Ordered, That Tammy Banks, Kate Green, Arun Midha, John Stevenson and Paul Thorogood, be members of the Sub-Committee.

Resolved, That the Sub-Committee have power to choose its own Chair.

Resolved, That the Committee will not in any circumstances challenge the decisions of the Sub-Committee but will agree without debate to any request by the Sub-Committee to approve its findings or to publish reports or evidence.²⁴

The Committee set out a framework for its conduct of appeals.²⁵

It described the arrangements as interim because they were proposed “without prejudice to any future decisions taken by the House in response to the Cox report” and the evolution of the ICGS might require further changes.²⁶

Indeed, on 23 July 2019, the Committee agreed modifications to the procedures for conducting appeals.²⁷

Sanctions

On 3 May 2019, the Committee launched an inquiry into possible reforms to the system of sanctions for breaches of the rules set out in the Code of Conduct for Members of Parliament.²⁸

²² *Ibid*, para 25

²³ *Ibid*, para 24

²⁴ Committee on Standards, [Formal Minutes 2017-19](#), 14 May 2019, p32

²⁵ Committee on Standards, [The Committee’s role in ICGS appeals](#), 13 March 2019, HC 1976 2017-19, para 13

²⁶ *Ibid*, para 19

²⁷ Committee on Standards, [Formal Minutes 2017-19](#), 23 July 2019, p36

²⁸ Committee on Standards news, [Inquiry into sanctions launched](#), 3 May 2019

The Committee had not completed the inquiry at the time of the dissolution of the 2017 Parliament.

The Committee reopened the inquiry on 1 June 2020.²⁹

Its report, *Sanctions in respect of the conduct of Members*, was published on 21 July 2020. The Committee described the existing system of sanctions. It also set out proposals for consistency in sanctions. It recommended a new suite of sanctions for use in both ICGS cases (by the Commissioner, the Independent Expert Panel (IEP) or the House, as appropriate) and in non-ICGS cases (by the Commissioner, the Committee or the House). It suggested new sanctions, including withdrawal of services and dismissal from a select committee.³⁰

In its response to the Committee, the Government identified reservations about the proposals and suggested some clarifications.³¹

As a result of the Government's concerns, the Committee consulted with the Leader of the House, the Chair of the IEP and the Commissioner and revised its proposed sanctions in both ICGS and non-ICGS cases. The revised sanctions, who decides on the imposition of the sanction and whether it was a currently existing power are set out in two tables published as an Annex to the Committee's March 2021 report, *Sanctions and confidentiality in the House's standards system: revised proposals*.³²

The proposed new powers to sanction were approved by the House on 21 April 2021.³³

1.3 ICGS in the House of Lords.

At its meeting on 4 July 2018, the House of Lords Commission endorsed the Behaviour Code; referred it to the Sub-Committee on Lords' Conduct and invited that Sub-Committee to "consider and report on how to integrate any new processes and procedures for investigating bullying, harassment and sexual harassment into existing processes for investigating breaches of the Code of Conduct".³⁴

The Committee for Privileges and Conduct's report, entitled *Independent Complaints and Grievance scheme: Changes to the Code of Conduct*, was published on 4 April 2019.³⁵ The report recommended that the Behaviour Code was incorporated into the Code of Conduct of the House of Lords, and set out how that should be done. It

²⁹ Committee on Standards, [Inquiry](#) [on the Committee's homepage]

³⁰ Committee on Standards, [Sanctions in respect of the conduct of Members](#), 21 July 2020, HC 241 2019-21

³¹ Committee on Standards, [Sanctions and confidentiality in the House's standards system: revised proposals](#), 30 March 2021, HC 1340 2019-21, Appendix

³² *Ibid*, Annex

³³ [HC Deb 21 April 2021 cc1074-1089](#)

³⁴ House of Lords Commission, [Minutes – 4 July 2018](#), Item 3

³⁵ Committee for Privileges and Conduct, [Independent Complaints and Grievance scheme: Changes to the Code of Conduct](#), 4 April 2019, HL Paper 335 2017-19

recommended that once the report was agreed the revised Code of Conduct should come into effect with immediate effect.³⁶

The Committee recommended that “a new Conduct Committee of nine members should be appointed, with five Lords members (one of whom would be the chair) and four lay members”.³⁷

It recommended that a new Standing Order should have the effect that “reports of the Conduct Committee on individual conduct cases, together with any resolution on sanction, should be decided by the House without debate”.³⁸

The Committee set out how its proposals would introduce greater independence to the process for investigating complaints:

The House already appoints an independent Commissioner for Standards to investigate and report on complaints. Under our proposals a new Conduct Committee will have lay members to work alongside the Lords members to hear appeals and oversee the *Code of Conduct*. The Commissioner rather than the Committee will recommend an appropriate sanction if a member is found to have breached the *Code of Conduct*. Reports from the Conduct Committee will be put to the House for decision without debate.³⁹

On 30 April 2019, the House of Lords agreed to the Committee for Privileges and Conduct’s report.⁴⁰

On 9 May 2019, the House of Lords agreed the members who would serve on the Conduct Committee; and, on 29 October 2019, the House appointed the four lay members, for the first time.⁴¹

On 5 March 2020, the Conduct Committee agreed its report *Progress report and amendments to the rules of conduct*.⁴² It was approved by the House of Lords on 16 March 2020, after Lord Mance, the Committee’s chair, outlined its recommendations, which he said sought “to ensure that the procedure for determining complaints and any appeals, and the safeguards and sanctions that may be involved, are clear, fair and effective”:

- “the commissioner should have power to restrict access to services or facilities during her investigation; or as a condition of agreed remedial action; or to make a similar recommendation to the Conduct Committee as a sanction for an offence”;
- “the full Conduct Committee need not, and probably should not, be involved in appeals” – a panel of three peers and two lay members would suffice; and
- “more serious sanctions— suspension and denial of financial support, for example—should continue to require the House’s endorsement; but a sanction that simply requires a Member to

³⁶ *Ibid*, paras 32-59

³⁷ *Ibid*, para 18

³⁸ *Ibid*, para 19

³⁹ *Ibid*, para 7

⁴⁰ [HL Deb 30 April 2019 cc862-887](#)

⁴¹ [HL Deb 9 May 2019 c1303](#); [HL Deb 29 October 2019 c873](#)

⁴² Conduct Committee, [Progress report and amendments to the rules of conduct](#), 5 March 2020, HL Paper 34 2019-21

regularise the position by apology or training where the Member will not voluntarily do this, or by statement to the House, should be capable of being imposed by the Conduct Committee without need to refer the matter to the House”.⁴³

The Conduct Committee also considered the investigation of older cases. It proposed “a single rule for both ICGS and other cases—currently the rules are different—so that both can be investigated if they allegedly occurred within the last six years but with a power to the Conduct Committee to allow older complaints if appropriate”.⁴⁴

The House of Lords agreed to the Committee’s report.⁴⁵

On 3 November 2020, following a report from the Conduct Committee,⁴⁶ the House of Lords accepted that “attendance at the Valuing Everyone training course should become a requirement of the code of conduct, and it should be a breach if a Peer does not attend”. Existing peers have until 1 April 2021 to complete the training and new or returning peers will have a three-month period to complete the training.⁴⁷ Peers also closed a loophole that “so that former MPs who come to or are now in the Lords, and former Lords who become MPs—in the rare cases that that happens—are no longer exempt from investigation and no longer fall into a loophole if the complaint concerns bullying, harassment or sexual misconduct while they were in their former House”.⁴⁸

The House of Lords Conduct Committee is considering developing “sanctions guidelines”.⁴⁹

1.4 Six-month and 18-month reviews of the ICGS

Six-month review of the ICGS

On 28 January 2019, Alison Stanley⁵⁰ was appointed by the House of Commons Commission to review of the first six months of the operation of the ICGS.⁵¹

On 25 February 2019, the Commission agreed the membership of an advisory review panel. On 18 March 2019, the panel ratified Alison

⁴³ [HL Deb 16 March 2020 cc1280-1281](#)

⁴⁴ [HL Deb 16 March 2020 c1281](#)

⁴⁵ *Ibid*

⁴⁶ Conduct Committee, *Valuing Everyone training: ICGS investigations: former MPs*, 26 October 2020, HL Paper 158 2019-21

⁴⁷ [HL Deb 3 November 2020 cc637-638](#)

⁴⁸ *Ibid*

⁴⁹ Conduct Committee, *Minutes of the meeting on Thursday 14 January 2021*, Item 4; and *Minutes of the meeting on 10 February 2021*, Item 5

⁵⁰ “Alison Stanley CBE FCIPD ... brings substantial public and private sector experience in the development and implementation of effective and engaging people practices. This includes the review and improvement of organisational approaches to bullying and harassment [House of Commons news, *ICGS: six-month review begins*, 22 March 2019.

⁵¹ House of Commons Commission, *Decisions, 28 January 2019*, Item 2

Stanley's appointment and agreed her terms of reference (see Box 3). Following this, work on the 6-month Review began substantively.⁵²

Box 3: Six-months review – terms of reference

The terms of reference for my review, as agreed by the advisory Review Panel, were as follows:

- Ownership of the ICGS, including but not limited to the accountability for ongoing monitoring of the effectiveness of the Scheme and the mechanism for discussion and agreement on consistency of any future changes to the Scheme.
- The operation of the ICGS to date, specifically the bullying and harassment, and sexual harassment policies and procedures. This will crucially take into account the views and experience of staff.
- The one-year pilot ISMA Service. Plans are underway to develop a tender for a three-year service thereafter based on learning from the pilot.
- The wording and interpretation of the Behaviour Code.
- The take-up of training and development relating to the Scheme.
- The effectiveness of the support provided to complainants and those subject to complaints.
- The equality and effect of the application of sanctions.
- Outstanding issues currently not dealt with by the Scheme, namely:
 - Third party reporting, that is by an individual who is not themselves the subject of the behaviour, and how those reports can be recorded and used;
 - Cluster reporting, that is where there are a number of reports about the behaviour of a person whether they have progressed to formal complaints or not, and how these reports should be handled, including duty of care reasons; and
 - Visitors to MPs' constituency offices.
- Recommendations for changes to the ICGS made in the Cox report or conveyed by Gemma White QC or the reviewer of the Lords staff bullying and harassment, other than the two key recommendations (being those set out in paragraph 409 of the Cox report) being taken forward separately.
- The issues that may need further consideration at the 18-month review, and whether an earlier review is needed.⁵³

She completed her report on 31 May. It was published on 12 June 2019. In her Executive Summary, Alison Stanley set out her key findings and recommendations:

25. The ICGS has a number of substantive elements. It comprises the Behaviour Code, being a shared set of explicit behavioural standards for all those working for and within Parliament and two new policies, the Bullying and Harassment Policy and the Sexual Misconduct Policy. For each of these policies there is an independent helpline, to provide support, advice and formal reporting of complaints. Where required, eligible complaints are then investigated by an independent investigation service.

26. A great deal of work went into the development of the Scheme, including advice taken from specialist advisors particularly in the area of sexual misconduct. As a result, both the Behaviour Code and the policies represent in some aspects leading edge practice, such as the unequivocal language used in the Behaviour Code. From my own experience of introducing change across diverse organisations, the fact that the Scheme has now been largely introduced across the Parliamentary Community

⁵² Alison Stanley, [Independent 6-month Review](#) [intranet link], 31 May 2019, paras 9-10

⁵³ Alison Stanley, [Independent 6-month Review](#) [intranet link], 31 May 2019, para 14

is an achievement and, from survey results, has been seen as a positive sign of a change in the culture of the Parliamentary Community by some. However, the experience of the first users of the ICGS has been very mixed, with much of the input I received being negative.

[...]

28. While the overarching policy and procedural principles were set out in the ICGS Delivery Report, the essential underlying implementation processes and policy decisions had not been developed at the time of the introduction of the Scheme for the House of Commons in July 2018. The amount of work and procedural complexity to effectively implement and operate the Scheme was substantially underestimated. This resulted in far too little resource being assigned to implementation, with a lack of the change management experience and specialist capability essential to deliver such a significant set of workplace policies and services.

29. As a consequence of this, for the purposes of my Review I have focussed on first order issues, building on the lesson of the first six months or so, to ensure effective and successful implementation of the Scheme. The key recommendations I make therefore relate to:

- ensuring continued focus, drive and coherence of the Scheme, by identifying the key accountabilities of senior leaders across the Parliamentary Community;
- creating a fully resourced bicameral ICGS team, with requisite skills and experience to ensure effective implementation and streamlined operation;
- a new dedicated approach to communication of the ICGS accessible to all and focussed on each user group within the Parliamentary Community clearly setting out the end-to-end processes;
- proactively using the Behaviour Code to improve ways of working in teams, for example as part of the wider cultural work being led by the new independent Director of cultural transformation in the House of Commons;
- building on the solid start on the training programme, ensuring the equal importance of training for all members of the Parliamentary Community is addressed.

30 In my judgement my recommendations need to be addressed promptly. In response to calls from stakeholders in some cases my recommendations provide the necessary detail to support full delivery.⁵⁴

Response to the six-month review

Alison Stanley presented her findings to the House of Commons Commission, at its meeting on 24 June 2019. The Commission took the following decisions:

- The Commission agreed that, subject to discussions with the House of Lords, the current ICGS team should become

⁵⁴ Alison Stanley, [Independent 6-month Review](#) [intranet link], 31 May 2019, paras 25, 26 and 28-30

a bicameral service and be expanded to enable the improvements to be implemented;

- Commission members wholeheartedly agreed that all MPs should undertake the Valuing Everyone training which has been put in place as part of the ICGS, and will consider in detail how that can be achieved at its next meeting; and
- The Commission agreed to, subject to discussions with the House of Lords, investigate further the establishment of a bicameral group of members, staff and other stakeholders, which will oversee delivery of the action plan, and the future operations of ICGS.

The Commission also agreed with the view of Gemma White QC who had written to Alison Stanley suggesting that former members of the parliamentary community should be able to have their complaints heard under the ICGS (this is at present restricted to those who are currently in post). This decision was taken in principle, pending the outcome and recommendations of Gemma White's inquiry.⁵⁵

18-month review of the ICGS

Alison Stanley was also appointed to conduct the 18-month review of the Scheme, which began in October 2020:

The 18 month review will cover:

- The operation and effectiveness of the Scheme to date (covering, for example, the level of awareness of and confidence in the Scheme; the effectiveness of training; current confidentiality arrangements; and the resourcing of the Scheme);
- Progress on implementation of the recommendations in the 6-month review;
- Progress on implementation of recommendations relating to the ICGS contained in the Cox, White and Ellenbogen reviews;
- Recent changes to the Scheme, including the widening of the Scheme to include non-recent cases, and the operation of the new single independent helpline; and
- The governance of the Scheme.

Alison expects to deliver her report in four months' time.⁵⁶

To inform her review, Alison Stanley requested feedback on experiences with the Scheme.⁵⁷

Alison Stanley's review was published on 22 February 2021. In her executive summary, Alison Stanley commented that:

... while there has been much progress, it has become plain that several aspects of how the ICGS is operating are impacting on the success of the Scheme and the confidence in it. Its operation and processes have become over complex and there is a perception

⁵⁵ House of Commons, [Independent Complaints and Grievance Scheme \(ICGS\): non-recent cases and six-month review](#), 26 June 2019

⁵⁶ House of Commons news, [ICGS: 18-month review begins](#), 9 October 2020 [intranet link]

⁵⁷ House of Commons, "[18-month review begins](#)", *The Newsletter*, 15 October 2020 [intranet link]

amongst the Parliamentary community that it is a stressful, isolated and lengthy process. This has been the experience of many of the contributors to the review, in particular during an investigation. Some groups are less likely to use the Scheme for confidential support and advice or to make a claim.⁵⁸

Also in her executive summary, she set out the focus of her recommendations (emphasis in original):

- **the simplification and clarification of procedures and processes, so as to shorten investigations and be able to** communicate clearly to complainants and respondents what to expect when considering making a claim with clear process end to end;
- **on investigations**, improving the operation, pace and experience of investigations, for both complainants and respondents;
- **increased support for complainants and respondents** when using the Scheme and integrating it into the ongoing employment relationship, in particular for MPs' staff;
- **moving to a policy and procedure framework** to underpin an effective governance mechanism for making changes to the Scheme more quickly and responsively;
- establishing a governance mechanism **enabling the Scheme to operate and be seen as a consistent framework and approach across Parliament** notwithstanding the difference in which procedure has been implemented in both Houses;
- **ensuring diversity and inclusivity is considered at every stage** so that the experience of all groups is one of equality - of access to, confidence in and outcomes from the Scheme;
- **addressing specific policy and procedural issues** that have caused issues;⁵⁹

Subsequent revisions to the ICGS

The House of Commons Commission considered the 18-month review. At its meeting on 22 March 2021, the Commission endorsed the proposals for textual changes to the policies and procedures concerning complaints of bullying and harassment or sexual misconduct, in response to Alison Stanley's report. It also endorsed other changes recommended by staff for clarification and updating of the documents.

On 22 April 2021, the Commission published a report entitled *Amendments to independent Complaints and Grievance Scheme*. The revised policies and procedures, agreed by the Commission in March, are annexed to this report.⁶⁰

On 28 April 2021, the House of Commons will be asked to endorse the Commission's report and approve the revised bullying and harassment

⁵⁸ Alison Stanley, [Independent Complaints & Grievance Scheme: Independent 18-Month Review](#), 22 February 2021, para 3

⁵⁹ *Ibid*, para 4

⁶⁰ House of Commons Commission, [Amendments to independent Complaints and Grievance Scheme](#), 22 April 2021, HC 1384 2019-21

policy and outline procedure, and sexual misconduct policy and outline procedure, set out in Annexes 1 to 4 of that report.⁶¹

1.5 Gemma White's comments on the operation of the ICGS

In her report on bullying and harassment of MPs' parliamentary staff, Gemma White commented on the operation of the ICGS and the barriers faced by Members' staff in making complaints. In her executive summary, she wrote:

The ICGS provides MPs' staff, for the first time, with a mechanism for having complaints of bullying and harassment independently investigated. This is a step in the right direction. However, contributors to this inquiry have expressed considerable concern about using the new procedures and scepticism as to what the ICGS can realistically achieve. Many of them told me they would not contemplate making a complaint under the new ICGS procedure, because it would be "career suicide". For others, personal and party-political loyalties stand in the way of reporting. Some are concerned about the independence of the ICGS process (since MPs remain involved in the process) and the lack of clarity as to the sanctions which could be imposed on an MP. Of those who said that they would consider complaining almost all had either left Parliament or were on the verge of doing so, but former employees have not been permitted to pursue complaints.⁶²

1.6 ICGS statistics

Parliament is proactively publishing information on the number of calls made to the Independent Bullying and Harassment Reporting Helpline and the Independent Sexual Misconduct Advisory Service; and the number of investigations begun, on a quarterly basis (see Table 1, overleaf).⁶³

The first annual report on the operation of the ICGS was published on the parliamentary intranet in November 2019,⁶⁴ and the second annual report was published in November 2020.⁶⁵

The November 2020 report outlined the work of the ICGS:

This reporting year (July 2019-June 2020), 293 individuals contacted the Independent Complaints and Grievance Scheme (ICGS). They made contact a total of 621 times, receiving information and support in a safe, confidential place and signposting to different available options. There were 69 cases considered by investigators, with 65 progressing to initial assessment and 50 progressing to full assessment. At the end of the reporting period, 46 cases were completed; 21% were upheld

⁶¹ House of Commons, *Order Paper*, 27 April 2021, Future Business A, [p21](#)

⁶² Gemma White, *Bullying and Harassment of MPs' Parliamentary Staff: Independent Inquiry Report*, 11 July 2019, HC 2206 2017-19, para 10

⁶³ UK Parliament, *Independent Complaints and Grievance Scheme proactively published statistics* [last viewed 19 November 2020]

⁶⁴ *Annual Report: Independent Complaints and Grievance Scheme July 2018-June 2019* (undated) [intranet link]

⁶⁵ *Independent Complaints and Grievance Scheme Annual Report (July 2019-June 2020)* [intranet link]

and 60% were not upheld. [A footnote explained that “The remaining cases might have been completed, but outside of the reporting period, or have been resolved with a different outcome, such as informal resolution. In a few cases, complainants withdrew their complaint or did not engage and so could not be completed.”]⁶⁶

Table 1: Calls to helplines and investigations commenced, by quarter

	Calls and emails to the helplines	Unique callers (UCs)	UCs for non-recent cases**	Investigations commenced
2018 – 3*	51	26		< 10
2018 – 4	201	86		14
2019 – 1	293	82		10
2019 – 2	238	91		< 10
2019 – 3	103	74		16
2019 - 4	172	94	23	22
2020 – 1	201	87	13	26
2020 – 2	238**	131**	3	< 10
2020 - 3	205	83		12
2020 – 4	202	118		< 10

Source: UK Parliament, [Independent Complaints and Grievances Scheme proactively published statistics](#)

* 19 July 2018-30 September 2018

** As of 21 October 2019, the ICGS was available to any member of the parliamentary community, present or former, who wished 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.

** These figures include 93 contacts by 93 separate individuals following a single incident on social media.

Figures from 1 April 2019 included investigations commenced either by the Independent Investigations Service or by the independent House of Lords Commissioner for Standards for complaints against members of the House of Lords or their staff, following changes to the Lords Codes of Conduct agreed on 30 April. Figures for previous quarters include only investigations commenced by the Independent Investigation Service.

⁶⁶ *Ibid*, para 1

2. Independent Complaints and Grievance Policy: Delivery Report

2.1 The Report

On 17 July 2018, the Independent Complaints and Grievance Policy (IGCP) Programme Team's Delivery Report was published.⁶⁷ It set out how the Programme Team, overseen by a steering group, had taken forward the House's decision of 28 February 2018 to implement recommendations to develop a parliament-wide behaviour code and independent complaints and grievance schemes to respond to and manage complaints of (i) sexual harassment and (ii) bullying and harassment.

Behaviour Code

The Delivery Report included a proposed Behaviour Code. It set out how visitors and those working in Parliament should treat each other.⁶⁸ It was adopted by the House of Commons on 19 July and is set out in Box 1 (in section 1).

Procedures for reporting and investigating

The Delivery Report set out separate procedures for reporting and investigating allegations of bullying and harassment; and for reporting and investigating allegations of sexual harassment. Separate helplines are in place; and a tender has been issued for independent investigation and dispute resolution services. The tender has been split into two 'lots', "to reflect the qualitative difference between sexual harassment and other types of inappropriate behaviour".⁶⁹

It set out the role of the Parliamentary Commissioner for Standards (PCS) and the Committee on Standards in investigating complaints about Members of Parliament. Before the Delivery Report was published the Steering Group had asked the Committee on Standards for comments – the Committee's comments were taken into account (see section 2.2).

Training

The Delivery Report envisaged that there would be training to support the introduction of the Behaviour Code and that training on acceptable behaviours would be put in place. It also said that a procurement exercise would be undertaken to ensure that any training recommended as a result of informal or formal processes to address behaviours related to bullying, harassment or sexual harassment would be available from September. Training would also be provided to line managers,

The Independent Bullying & Harassment Reporting Helpline and the Independent Sexual Misconduct Advisory Service are now available. (A single helpline will operate from early July 2020.)

Valuing Everyone training is underway.

⁶⁷ Independent Complaints and Grievance Policy (IGCP) Programme Team, [Independent Complaints and Grievance Policy Delivery Report](#), July 2018

⁶⁸ *Ibid*, para 11

⁶⁹ *Ibid*, para 18

including MPs to improve line management practice – a ‘good employer’ standard will be developed.⁷⁰

Support

The Delivery Report set out steps that have been taken to ensure that a human resources support service is available for staff of MPs.⁷¹

Culture change

The Delivery Report highlighted the need for culture change to ensure that the Scheme worked. It identified the importance of embedding the Behaviour Code and encouraging speaking out when it was not adhered to. It noted that confidence in the Scheme would be important to its success. It also identified the need to promote a culture of “co-professionalism” across Parliament.⁷²

Pre-Scheme cases

The Delivery Report confirmed that “The Steering Group has agreed that the new Scheme can investigate incidents that occurred from the start of this Parliament (June 2017)”.⁷³ However, the Delivery Report also noted that “The Steering Group are determined that the new Scheme is not a ‘day zero’ approach that ignores the problems of the past”.⁷⁴ The Delivery Report “set out the options available to complainants to pursue a route that offers the best chance to deliver what they need to find resolution” – these noted that some pre-2017 complaints might be taken into account if they constituted “continuing acts”. Complainants bringing forward older cases that were not continuing “will be able to talk through the details with an independent adviser and be pointed in the direction of where they can get support and counselling services”.⁷⁵ Any decision on investigation would be based on the policy or code in place at the time.

Reviewing the operation of the Scheme

The Delivery Report set out the scope of reviews, recommended by the Working Group, that should take place six and 18 months after the Scheme’s introduction.⁷⁶

Application of the Independent Complaints and Grievance Policy

In an interview on the Policy, on the Westminster Hour on 15 July 2018, Andrea Leadsom, the Leader of the House of Commons, who chaired the Steering Group, said that “Anybody who works in, with or for Parliament must be given the same access to an equal and fair system that gives them the satisfaction of final closure for their complaint”.⁷⁷

⁷⁰ *Ibid*, paras 32-39

⁷¹ *Ibid*, paras 40-43

⁷² *Ibid*, paras 73-86

⁷³ *Ibid*, para 95

⁷⁴ *Ibid*, para 87

⁷⁵ *Ibid*, para 93

⁷⁶ *Ibid*, paras 98-100

⁷⁷ BBC Radio 4, [The Westminster Hour](#), 15 July 2018, Andrea Leadsom’s interview

In a message to House of Commons staff, following the publication of the Delivery Report, the Clerk of the House stated that if the report was agreed to by the House, the Policy would be applied to House staff:

Last night [16 July 2018] the House of Commons Commission agreed, in consultation with the TUS, that the new policies and procedures will apply to staff of the House Service and the Parliamentary Digital Service, should they be adopted by the House.

2.2 Committee on Standards' views on implementing the Independent Complaints and Grievance Policy

In February 2018, the House agreed that the Committee on Standards and the PCS should be consulted as the Policy was developed.⁷⁸

In its report, *Independent Complaints and Grievance Policy: Implementation*, the Committee on Standards commented on parts of the new policy which fall within its remit.⁷⁹

The Committee was asked:

- Whether it will be sufficient to make minor alterations to the Code of Conduct to make it refer to the new Behaviour Code, or whether more extensive amendments will be required?
- How the Committee on Standards could enhance the powers and/or practices of its lay members to give them a meaningful role in Committee decision making?
- Whether the proposed new system of independent investigation and appeals to the PCS ... will work in practice?⁸⁰

In addition, the Committee considered the Working Group's proposals on not disclosing details of investigations before they were concluded.

The Committee concluded that the Behaviour Code, if approved by the House "should also be incorporated into the Code of Conduct."⁸¹

The Committee recommended that lay members should be able to vote on motions relating to a draft report. Because lay members cannot participate in formal divisions in the Committee, it recommended that "before dividing on any motion not related to a draft Report, the Committee should hold an indicative vote of lay and elected members to ascertain the views on the motion of the Committee as a whole and of each member present". After this indicative vote, which would be recorded in the Committee's minutes, the Committee may or may not proceed to a formal division, involving only the MPs on the Committee. The Committee recommended that Standing Orders should be changed to "entrench 'indicative votes' in the rules of the House". It added that

⁷⁸ [HC Deb 28 February 2018 cc866-904](#)

⁷⁹ Committee on Standards, *Independent Complaints and Grievance Policy: Implementation*, 13 July 2018, HC 1396 2017-19

⁸⁰ *Ibid*, para 6

⁸¹ *Ibid*, para 13

this was an interim measure and also recommended the introduction of primary legislation “to allow the extension of full voting rights to lay members” .⁸²

The Committee outlined the Steering Group’s proposals for dealing with complaints of bullying and harassment and sexual harassment, and proposed some “significant revisions to the process”. The table below compares the Steering Group’s proposals with the Committee’s.

Steering Group process⁸³	Committee on Standards revisions
1. Helpline/Independent investigation	Commissioner should be involved in oversight of all investigations into Members’ conduct and in drawing up the protocols under which investigations are carried out. ⁸⁴
2. Appeal to the PCS, who can reinvestigate if necessary. PCS can impose a penalty or, if conduct requires a penalty beyond her powers, she refers the matter to the Committee on Standards.	If the Commissioner has an oversight role, she would not be able to carry out an ‘appeal’ function. “It would logical for this function to be carried out by the Committee” . ⁸⁵
3. “Committee on Standards considers the initial investigation report and the Commissioner’s report and recommends an appropriate sanction to the House. (It is not an appeal body.)”	
4. House votes on the sanction (without debate)	House should take decisions on sanctions on the basis of a report from the Committee. ⁸⁶

The Delivery Report confirmed that the Steering Group accepted the Committee on Standards approach:

After engagement with the Commons Committee on Standards and the Parliamentary Commissioner for Standards and the Lords

⁸² *Ibid*, paras 32-36

⁸³ *Ibid*, para 15

⁸⁴ *Ibid*, para 17ff

⁸⁵ *Ibid*, para 26ff

⁸⁶ *Ibid*, paras 44-45

Commissioner, it became clear that the relevant Commissioner should have oversight of the investigation process.⁸⁷

The Committee also expressed concern that the Steering Group's requirement for confidentiality in relation to investigations could affect the PCS's current practice of publishing the names of Members who are under investigation. It argued against such a change in practice.⁸⁸

In the Delivery Report, the ICGP Programme noted that in many cases, no information will be in the public domain but when the Commissioner is formally involved, she would take into account the privacy of complainants.⁸⁹

2.3 Reaction to the Delivery Report

Before publication

Before the Delivery Report was published there were a number of reports about its contents and reactions to what was expected to be in the report.

Chris Cook, the Newsnight reporter whose investigations led to the establishment of Dame Laura Cox's inquiry, reported under the headline "Parliament harassment plans fall short of staff hopes", on 10 July 2018.⁹⁰

The *Guardian* and the *Financial Times* reported that some members of the Steering Group and the FDA had expressed concern that the new policy would not cover pre-2017 cases.⁹¹

Dave Penman, the General Secretary of the FDA, one of the unions representing staff of the House blogged on the *Huffington Post* website. He welcomed the extension of the Scheme to cover everyone in Parliament but argued that the Scheme should have taken into account Dame Laura Cox's conclusions before being issued. He also welcomed the role of the PCS in overseeing and resolving "minor misdemeanours" but expressed concern that Members would judge more serious cases. The "most problematic issue" for Penman was the decision not to allow investigations into pre-2017 cases.⁹²

After publication

In an Institute for Government blog post, Hannah White, the Institute's Director of Research, formerly a clerk in the House of Commons, suggested that the proposals "may make matters worse". She said that while objectively it was a good thing that there would now be a system,

⁸⁷ Independent Complaints and Grievance Policy (IGCP) Programme Team, [Independent Complaints and Grievance Policy Delivery Report](#), July 2018, para 50

⁸⁸ Committee on Standards, [Independent Complaints and Grievance Policy: Implementation](#), 13 July 2018, HC 1396 2017-19, paras 41-42

⁸⁹ Independent Complaints and Grievance Policy (IGCP) Programme Team, [Independent Complaints and Grievance Policy Delivery Report](#), July 2018, paras 69-70

⁹⁰ BBC News, [Parliament harassment plans fall short of staff hopes](#), 10 July 2018

⁹¹ Rajeev Syal, [Bullying by MPs before 2017 election likely to escape scrutiny](#), *Guardian*, 11 July 2017; [Westminster sex harassment inquiry will exclude pre-2017 claims](#), *Financial Times* [subscription required], 11 July 2018

⁹² Dave Penman, ["It Shouldn't Take Public Airing Of Ruined Lives To Shame MPs Into Acting On Harassment"](#) *The Blog*, *Huffington Post*, 13 July 2018

where before there was none, to protect MPs' staff, the changes were not enough.

She was critical that the Committee on Standards would still be responsible for making recommendations concerning the behaviour of Members. She did not believe that the report represented a change in culture, saying that "the working group seems to have started with the status quo and asked itself what is 'achievable' politically". She also expressed concern that by implementing the Scheme now, it would not take into account the findings of the Independent Inquiry into bullying and harassment of House of Commons Staff.⁹³

The FDA, one of the recognised unions representing staff in the House of Commons Service has criticised the proposals in the Delivery Report. It has concerns about the scheme not allowing investigations into pre-2017 cases; that the new scheme is being launched before Dame Laura Cox has published the report of her inquiry; and that decisions on sanctions are not independent of Members of Parliament.⁹⁴

Other unions representing House staff have not commented publicly on the Delivery Report.

⁹³ Hannah White, "[Bullying in Parliament: new measures may make matters worse](#)", Institute for Government, 17 July 2018

⁹⁴ The union's concern about the Scheme not covering pre-2017 was highlighted in a *PoliticsHome* article: John Johnstone, - [Union bosses slam Westminster sex abuse complaints procedure for excluding historical allegations](#), *PoliticsHome*, 17 July 2018

3. Background to the Delivery Report

A Working Group on an Independent Complaints and Grievance Policy was formed in November 2017, following allegations and accounts of inappropriate behaviour and a culture of bullying and sexual harassment at Westminster.

Before the Working Group was formed, the Prime Minister had convened a meeting of party leaders. They agreed that swift progress should be made on an independent grievance process.⁹⁵

The Working Group's report was published in February 2018.⁹⁶ The Working Group called for the development of:

- (a) A Parliament-wide behaviour code
- (b) An independent complaints and grievance scheme including two new Parliament-wide policies for responding to and managing complaints of
 - i. Sexual harassment; and
 - ii. Bullying and harassment

On 28 February 2018, the House debated the Working Group's report. The House endorsed the Working Group's recommendations and asked the House of Commons Commission to authorise House officials to undertake the work to take forward the recommendations.⁹⁷

The Working Group said that it would "reconvene for a limited period of time as a Steering Group to oversee the progress of the workstreams put in place by the House of Commons Commission in accordance with an agreed timetable".⁹⁸

The work recommended by the Working Group was undertaken by the Independent Complaints and Grievance Policy (ICGP) Programme, which was overseen by the Steering Group.⁹⁹

⁹⁵ [HC Deb 16 November 2017 c605](#)

⁹⁶ Working Group on an Independent Complaints and Grievance Policy, [Report](#), 8 February 2018

⁹⁷ [HC Deb 28 February 2018 cc866-904](#). Background information, prepared for the debate on 28 February 2018 can be found in the Library Debate Pack, [Independent Complaints and Grievance Policy](#), CDP 2018-0049, 26 February 2018

⁹⁸ Working Group on an Independent Complaints and Grievance Policy, [Report](#), 8 February 2018, para 48

⁹⁹ House of Commons, [Independent Complaints and Grievance Policy Programme](#) [intranet pages]

4. Independent Inquiry into bullying and harassment of House of Commons Staff (Cox Report)

Complaints about the behaviour of Members towards staff of the House were reported by *Newsnight* in March 2018.¹⁰⁰ Following the first *Newsnight* reports, the House of Commons Commission agreed to establish an independent inquiry into Bullying of Staff in the House of Commons:

INDEPENDENT INQUIRY

In Mr Speaker's absence, the Commission was chaired by Tom Brake.

The Commission agreed that an inquiry into the bullying and harassment of House staff should be initiated immediately, and tasked its Non-Executive members with appointing an independent expert to lead the inquiry and with developing terms of reference.

[Statement on bullying of House Staff.](#)¹⁰¹

Janet Gaymer and Jane McCall, the non-executive members of the House of Commons Commission, appointed Dame Laura Cox QC to lead the Inquiry. The appointment and the Inquiry's terms of reference were announced, in a press release, on 23 April.¹⁰² The press notice described Dame Laura's role and set out an initial timetable for the Inquiry:

The findings of Dame Laura's inquiry will be laid before the House of Commons. It is hoped that preliminary findings will be available before the summer recess with a final report produced in the Autumn.

The Inquiry will consider issues impacting directly on House of Commons staff (those employed directly by the House of Commons rather than by Members of Parliament). It is an inquiry, not an investigation. Dame Laura will not be investigating any individual complaints or reopening past cases. The Inquiry will, however, consider what options are available for resolving current or historical allegations and the support available to those affected. No Parliamentarians will be involved in the conducting of the Inquiry.

In this press notice, the closing date for submissions to the inquiry was set as 8 June 2018.

The Inquiry's Terms of Reference were also set out in the press notice and are quoted in full in Box 4.

¹⁰⁰ Chris Cook and Lucinda Day, "[Bullying and harassment at the House of Commons](#)", *BBC News*, 8 March 2018

¹⁰¹ House of Commons Commission, [Decisions – 19 March 2018](#), Item 1

¹⁰² House of Commons, [Independent Inquiry into Bullying and Harassment of Commons Staff](#), 23 April 2018 [intranet link]

Box 4: Independent Inquiry into the Bullying and Harassment of House of Commons Staff – Terms of Reference

The Inquiry's Terms of Reference are as follows:

Objectives

The objectives of the inquiry are -

- to establish the nature and extent of bullying and harassment (including sexual harassment and any systemic behaviours) of past and present House of Commons staff;
- to identify any themes and patterns regarding how previous complaints about such behaviour were handled or how complainants were treated, or, if no formal or informal complaint was made, the reasons for this;
- to assess previous, existing and any proposed policies and procedures relating to bullying or harassment and to complaints about such behaviour, comparing them to current best practice, with a view to making any recommendations for improvement in the way in which such complaints are handled or will be handled in the future, including the availability of appropriate internal or external support; and
- to consider and comment upon the House of Commons as a place of work with regard to ensuring the treatment of staff with dignity and respect and maintaining an open and supportive culture.

Scope and Methodology

- The Inquiry will invite past and present House of Commons staff and others with relevant perspectives (including staff representatives) to offer in person or in writing their experiences of perceived bullying and harassment, including sexual harassment.
- All contributions will be treated in strict confidence and will not be published or liable to release. Any references to such information in any Report arising from the Inquiry will be anonymised. No individual will be identified or identifiable.
- It is not the purpose of the Inquiry to reopen past complaints of bullying or harassment or to investigate new ones against particular individuals. It is hoped that the opportunity offered to House of Commons staff to reflect on the House of Commons as a place of work and to present their experiences to an independent third party in confidence may help them to achieve closure, where appropriate.
- No existing route of complaint open to staff will be affected by the Inquiry, and those submitting experiences will be given details of any existing routes which may be pursued, and of available support or counselling services or other pathways for the resolution of such complaints.
- The Inquiry will be provided with all necessary resources under the auspices of the two non-executive members of the House of Commons Commission, who will provide any necessary guidance and support as requested by the Inquiry in order to help it achieve its objectives.
- The Inquiry will aim to present preliminary findings to the House of Commons before the summer recess, depending on the numbers of people who come forward, and a Final Report as soon as reasonably practicable thereafter.

On 9 May 2018, Dame Laura Cox wrote to all staff of the House of Commons and extended the deadline for the submission of relevant information to 29 June 2018.

On 26 June 2018, Dame Laura issued a further statement. She said that "The first stage of the Inquiry, involving the gathering of information from present and former members of House staff, is not expected to end until 13 July 2018". She also announced that she no longer intended to issue preliminary findings before the summer recess and that her report would be completed in September.

Dame Laura's report was published on 15 October 2018 (see section 5).

5. Dame Laura Cox's Inquiry Report

5.1 Introduction

The Bullying and Harassment of House of Commons Staff – Independent Inquiry Report, by Dame Laura Cox was published on 15 October 2018.¹⁰³

Dame Laura did not provide an Executive Summary. She commented that:

The problem with merely summarising a set of recommendations at the conclusion of this lengthy report is that it seems to me to undervalue the deep-rooted problems that lie at the heart of all these issues.¹⁰⁴

However, in a statement at the beginning of her report, she suggested that “those looking to see if changes are being made over the coming weeks” should “look for progress as regards the following fundamental recommendations”. She said that they merited “urgent consideration”, before the six-month review of the ICGS:

- The “Valuing Others Policy” and the “Revised Respect Policy” should both be abandoned as soon as possible, and members of House staff wishing to complain about bullying, harassment or sexual harassment should no longer be required to use them.
- The new Independent Complaints and Grievance Scheme should be amended, so as to ensure that those House employees with complaints involving historical allegations can access the new Scheme.
- Steps should be taken, in consultation with the Parliamentary Commissioner for Standards and others, to consider the most effective way to ensure 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.¹⁰⁵

5.2 Existing policies

The existing policies and procedures – Valuing Others Policy and the Revised Respect Policy – were to continue to operate “as an alternative [to the ICGP] for the time being” and for complaints about allegations that pre-date the start of the 2017 Parliament.¹⁰⁶ Dame Laura commented that:

Given that, in their statement issued in July, the House appears to accept that these policies do not provide “*robust processes for dealing with bullying and harassment*” this is a deeply unattractive

On 24 October 2018, the House of Commons Commission [confirmed](#) that the Valuing Others and Respect Policies had been terminated.

¹⁰³ Dame Laura Cox, [The Bullying and Harassment of House of Commons Staff – Independent Inquiry Report](#), 15 October 2018

¹⁰⁴ Ibid, para 412

¹⁰⁵ Ibid, p6

¹⁰⁶ Ibid, para 220 citing the House of Commons *Staff Handbook*, chapter 6

option for those staff with historical complaints. The House is effectively requiring those whom it employs to use procedures accepted to be inadequate and ineffective for that purpose.¹⁰⁷

She said that the Valuing Others Policy, “In its present form it does not provide either an accurate summary of the legal position or an effective policy for dealing with bullying, harassment and sexual harassment occurring within staff relations”.¹⁰⁸ In relation to the Revised Respect Policy, she said that “I’m afraid that the Revised Respect Policy badly fails the test it was set. It is simply not an effective policy for addressing the bullying, harassment or sexual harassment of members of staff by Members of Parliament”. She continued that:

There are serious issues of substance, which I shall deal with first, but there are two fundamental concerns, namely the lack of independence in the procedures dealing with such misconduct by Members, and the inability of the policy to address historical patterns of such behaviour. And regrettably these concerns apply to the new Scheme in addition.¹⁰⁹

5.3 Independent Complaints and Grievance Policy

Dame Laura welcomed much of the new scheme:

There is much to be welcomed in this new Scheme, reflective of the careful attention paid to current good practice in these areas. The development of a code of behaviour, bullying and harassment and sexual misconduct policies, and recognition that sexual harassment is a separate and distinct form of harassment are significant improvements. So too are the following: the introduction of anonymous reporting to the helplines for monitoring purposes; the stated intention to provide greater support for those wishing to pursue complaints; and recognition that unfounded complaints should not be conflated with malicious complaints. The tendering process for both the specialist investigation and dispute resolution services is apparently under way and the independence of those services is a significant improvement.¹¹⁰

But, as noted above, she expressed concern about consideration of historical allegations and the involvement of MPs in the process:

Given these obvious improvements, it is a matter of regret that serious concerns as to how complaints of historical allegations are to be dealt with, and as to the lack of independence in procedures involving Members of Parliament, are serving to damage the prospects of success for this new Scheme, in generating staff confidence that their complaints will be dealt with fairly and impartially, and in restoring public confidence.¹¹¹

She made both very specific recommendations about the wording of particular aspects of the policy and more far-reaching recommendations about the nature of the policy. This note does not report them all.

¹⁰⁷ Ibid, para 223

¹⁰⁸ Ibid, para 235

¹⁰⁹ Ibid, para 273

¹¹⁰ Ibid, para 289

¹¹¹ Ibid, para 291

Confidentiality

Dame Laura welcomed the decision to make the investigative stage of the process confidential. However, where no objection to publication was raised, “the retaining of confidentiality of the investigative proceedings should in my view depend on the stage of the process reached and the nature of the allegations”. She recommended that:

Confidentiality should be retained in all cases until a decision has been made that there is a case to answer and the complaint has been sent for full investigation by the independent investigator. I do not consider that a complaint which involves, for example, an alleged incident of “low level” rudeness, which is capable of being resolved informally with an apology, requires publication of the incident or the identity of the alleged perpetrator. However, in those more serious cases, where the allegations indicate a pattern or a series of abusive acts over a period of time, or where there is a single but more serious allegation, then in my view the name of the alleged perpetrator and the nature of the allegations made should be published if the matter proceeds to full investigation. In cases involving serious or persistent abusive conduct, there is in my view a legitimate public interest in transparency and in public awareness of alleged misconduct in violation of the Code.¹¹²

Ownership

She stressed the importance of clarifying the ownership of the Scheme. She said that:

it is unclear at present who exactly is to have ownership of the new Scheme and where responsibility for its success or failure will lie. Accountability is crucial. Those with responsibilities for its delivery and for monitoring its progress should be identified within the policy itself, and it is essential in this case that ownership of the new Scheme in its entirety is invested at the highest levels of the House, with the obligations for the Speaker, the Commission, the Clerk of the House and the Director General all clearly identified.¹¹³

Dealing with the past

As indicated above, Dame Laura wrote that “the decision that the new Scheme will apply only to complaints about misconduct occurring since June 2017 is a regrettable one and I strongly recommend that it be urgently re-considered”.¹¹⁴

Dame Laura reviewed the advice from Counsel that the Steering Group obtained before deciding that the scheme should not be retrospective:

Counsel was instructed to advise on whether the common law presumption against retrospective effect would *of itself* prevent the new Scheme being used to investigate complaints relating to events which occurred before the date when new Scheme came into force. His conclusion, with which I entirely agree, is that it would not, and that it is debatable whether the presumption against retrospective effect has any relevance at all in these circumstances.¹¹⁵

The House of Commons agreed to extend the ICGS to cover historic cases on 17 July 2019 (see section 7.1).

¹¹² Ibid, para 297

¹¹³ Ibid, para 301

¹¹⁴ Ibid para 315

¹¹⁵ Ibid, para 320

She argued that:

321. Essentially, the new Scheme does not set any new rules or standards for Members, which did not already apply at the time when older complaints arose. The new Scheme is to be used to investigate complaints about bullying, harassment and sexual harassment, and abusive conduct of this sort has always been unacceptable behaviour in Parliament. There may not have been written policies in place expressly prohibiting such conduct, but it is obviously not the case that such conduct was acceptable among the Parliamentary Community in the past and will now be rendered unacceptable by the new Scheme.

She noted that:

322. The law does not protect against subsequent procedural changes where the substantive standards have not changed. As counsel points out, where procedural changes in the decision-making process occur through legislation, the presumption is that they are in the interests of justice because they will improve the quality of that decision-making. The aim of this new Scheme is to ensure better quality of decision-making in relation to complaints of bullying and harassment. Consequently, using the new Scheme to investigate older complaints would be more rather than less fair, to both the complainant and the alleged perpetrator.

She also considered whether there should be a requirement on anyone wishing to have a historical complaint investigated to lodge their complaint within a published period. She acknowledged that “There is a need to take stock in each case before a full investigation takes place”. She saw no objection to potential complainants taking advice first. She suggested complaints should be lodged with the investigation service within a reasonable period after that advice and support phase has ended. But Dame Laura did not specify how long that period should be, saying “What that period should be will be a matter for discussion and agreement”.¹¹⁶

Oversight of the scheme

Dame Laura highlighted call for “independent and impartial procedures for investigation and sanction”. She said that these calls were driven, “essentially, by the principle that justice must not only be done, but that it must also be seen to be done, and by the belief that only such mechanisms will restore the confidence of staff and public alike”.

She noted that under the ICGS, “Members of Parliament on the Committee of Standards will continue to sit in judgment on their colleagues in these difficult and sensitive cases”. But she found that “A careful analysis of all the material presented to this inquiry leads to the firm conclusion that the internal mechanisms for adjudicating on complaints in these cases are no longer tenable”.

She said that as well as being independent and impartial, “any change should also command the respect and confidence of Members of Parliament”.

The House of Commons Commission agreed proposals for an independent system, on 27 April 2020 (see section 7.2).

¹¹⁶ Ibid, paras 332-333

However, in her view, “the new Complaints Scheme does not meet these tests”.¹¹⁷

She set out some observations “to assist in any consideration of how an independent process might work”:

399. There is no reason why the Commissioner should not retain her present powers of informal resolution for those cases which are appropriate for such a course, where the complainant agrees, or which are insufficiently serious to require full investigation.

400. Where it is necessary to proceed to a full investigation, the investigation process should oblige all parties to participate, and render them subject to penalties for failure to do so. The standard of proof would be the balance of probabilities, as it is now. But in my view some adjustments would need to be made to the current investigation procedure as set out in the Scheme.

401. The investigation into the conduct of a Member of Parliament should be carried out by someone whose status, independence, expertise and experience are beyond question, and who has power to take evidence and require the production of documents. Distinguished senior lawyers or retired judges, highly experienced in handling these sensitive cases and in analysing evidence and finding facts, would ensure that the investigations and conclusions were treated with respect. Such a system would, or should command the confidence of any Member who considers that he or she has been falsely accused.

402. The investigator would send a provisional report to both parties, enabling them to comment on factual accuracy, and then provide the full report with reasoned findings to the Commissioner. And such an investigator, who has heard the evidence, conducted a fair investigation and given a reasoned decision upholding the complaint is more than capable of recommending an appropriate sanction.

403. The decision as to sanction would then be taken by the Commissioner herself, as the independent officer for standards in the House. Before that decision, there could be provision for either party to make written or oral representations to the Commissioner about the investigation or the report, or to make representations about sanction, with an oral hearing before the Commissioner as appropriate, either on her own or sitting with an independent legal adviser, to determine whether the report should stand and to consider sanction. If the report stands, the Commissioner can proceed to sanction. And her decision is final.

404. One of the problems with the current system is the absence of a range of specified sanctions for cases where these complaints are upheld. Leaving aside the extreme case of triggering a recall petition, with all its difficult democratic implications, there is obviously a broad range of possible sanctions to be considered, apart from apologies or attendance on training or behaviour programmes, including for example the imposition of fines, disqualification from, or suspension of membership of select committees or membership of overseas delegations; the withdrawal of services by House staff, or the withdrawal of financial support for visits abroad or other activities. Only if a very serious question was raised during the process as to someone’s

¹¹⁷ Ibid, aras 359-363

fitness to serve as a Member should consideration be given to a report to the House to determine any question of recall.

405. These brief observations are offered simply to assist in any consideration of how an independent process might work, and to indicate that there are no insuperable barriers to such a process. Others may have different views as to how such a process could work. But the keys to reform are independence and impartiality, if the staff are to have faith in the process and if public confidence is to be restored. And an independent investigation by someone whose status, integrity and expertise are beyond question is a process in which all Members of Parliament can have confidence, and which I would regard as providing safeguards which are very much in their best interests.

5.4 Culture change

Dame Laura reviewed the contributions she had received from staff and noted a number of references to the culture of the House of Commons. She also noted that there had been an acknowledgement from Members that the culture of the House needed to change:

During the debate in the House on 28 February there was frank acceptance by some MPs that the culture of an organisation was the responsibility of its leaders, that there had been "*a failure of our own governance*" and that "*a culture of tolerance towards bullying and harassment had become embedded and left substantially unchallenged until now.*"¹¹⁸

In other paragraphs, she noted the consequences of the culture that existed in the House, for example:

These institutional failings are symptomatic of the general culture that has long existed in the House, and that has led to the present inquiry.¹¹⁹

At senior management level, the culture of tolerance towards bullying and harassment by some Members, and the failure to tackle it has influenced both the substance and implementation of the Respect Policy, in which many members of staff have no confidence.¹²⁰

She made a number of comments about systems in place in the institution, including:

I have also referred throughout this report to systemic or institutional failings and to a collective ethos in the House that has, over the years, enabled the underlying culture to develop and to persist. Within this culture, there are a number of individuals who are regarded as bearing some personal responsibility for the criticisms made, and whose continued presence is viewed as unlikely to facilitate the necessary changes, but whom it would also be wrong for me to name, having regard to the terms of reference for this inquiry. I hope, however, that the findings in this report will enable a period of reflection in that respect in addition.¹²¹

¹¹⁸ Ibid, para 47

¹¹⁹ Ibid, para 57

¹²⁰ Ibid, para 68

¹²¹ Ibid, para 420

Julie Harding took up a one-year post as Independent Director – Cultural Transformation on 18 February 2019 (see section 9.3 for more information).

6. Response to the Cox Report

6.1 Urgent Question on Dame Laura Cox's Report

On 16 October 2018, John Mann was granted an Urgent Question, "To ask the Leader of the House to make a statement on 'The Bullying and Harassment of House of Commons Staff Independent Inquiry Report'".¹²²

Before calling Mr Mann, the Speaker made a short statement. He told the House that

... Without seeking to pre-empt what the House might ultimately decide, I firmly believe that the only possible way to resolve this matter is the establishment of a body that is both entirely independent of and external to Parliament to hear and adjudicate on all allegations of bullying, harassment and sexual misconduct, including deciding how far to investigate past misconduct. Whether the allegations involve MPs or staff, the same entirely independent body should be in complete control of the process from start to finish.¹²³

Appendix 1, in a separate document on the [landing page](#) for this briefing paper, reports on the exchanges that took place around the Urgent Question.

6.2 Management Response

Following the publication of Dame Laura Cox's report, the Clerk of the House, Sir David Natzler, and the Director General, Ian Ailles, informed all staff of the House and thanked Dame Laura for her report. They said that:

Bullying and harassment have no place in the House of Commons, and the wellbeing of our people will always be our top priority.

Staff must be confident that unacceptable behaviour will be dealt with seriously, independently and with effective sanctions. Urgent work has already been undertaken to improve internal processes – including the introduction of new confidential support services and helplines run by external, independent specialist providers and a clear pathway for the investigation of allegations.

The findings of this inquiry will be taken into careful account.

They advertised briefings on the ICGS for all staff and gave contact details for support and counselling services.¹²⁴

The Commons Executive Board told the House's Leadership Forum, on 23 October 2018, that it backed Dame Laura's three central recommendations.¹²⁵

¹²² [HC Deb 16 October 2018 cc529-548](#)

¹²³ Ibid, c529

¹²⁴ Email to all staff of the House, 15 October 2018

¹²⁵ Email to R&I staff, 24 October 2018

6.3 Outcome of the House of Commons Commission meeting on the Report

At its meeting on 24 October 2018, the Commission discussed Dame Laura Cox's report. Following its meeting, the Commission issued the following statement

Following the publication of Dame Laura Cox's report on the bullying and harassment of House of Commons staff, a meeting of the House of Commons Commission was convened to discuss the report's recommendations and consider a way forward. The meeting was rescheduled from the original proposed date, on 22 October, to ensure it could be chaired by Jane McCall, the senior external member of the Commission.

We are grateful to all of those who contributed to the report, as well as those who communicated with us directly. All views and contributions have been fully considered. This includes a representation from the Commons Executive Board which called for acceptance of Dame Laura Cox's three fundamental recommendations.

We have a statutory responsibility for the employment of House staff and have too often failed to honour the responsibility to provide a workplace free from bullying and harassment. Dame Laura Cox's report describes an institutional failure to address the problem which has undermined the legitimacy and authority of the House of Commons.

The scale of the problem and depth of hurt caused is beyond dispute.

We are determined to take immediate steps to rectify past mistakes where and when we can and are committed to a robust effort to change the culture which has tolerated such abuses. The staff of the House of Commons are essential to the functioning of democracy. We deeply regret that their diligence has at times been so poorly repaid, and that it has taken so long for us to recognise what must be done.

It is time for a change.

We have therefore agreed to the three fundamental recommendations highlighted by Dame Laura on page 6 of her report.

1. We are terminating the Valuing Others Policy, and have suspended operation of the Respect Policy recommending that the House terminate it as soon as possible;
2. We recommend that the House amend the new Independent Complaints and Grievance Scheme to ensure that those House employees with complaints involving historical allegations can access the new Scheme;
3. We recommend that the House consider the most effective way to ensure 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.

It is now up to the House to take forward these recommendations to which we are fully committed. We would expect to see them progressed as quickly as possible.

Furthermore, we are also committed to a thorough and robust response within the context of our statutory responsibility for the employment of House staff, in order to prevent the future bullying and harassment of and sexual misconduct towards staff. We have directed the Commons Executive Board to produce a timely and resourced action plan in consultation with a wide range of stakeholders. This will be taken forward under the auspices of the external members of the Commission and drawing on such independent and external advice as may be required.

These are first steps. These changes should not be limited to House staff but must encompass the whole Parliamentary community. In time, it may become clear that further changes are needed.

Bullying and harassment have no place in the House of Commons, or in any area of public life. The persistence of this problem has rightly called into question the culture and leadership of the House of Commons. We acknowledge that we have a proactive role to play in improving the culture of the House Service, and therefore are resolved to ensure that Dame Laura Cox's report marks the moment where we commit to swift and lasting change.¹²⁶

The Speaker made a short statement before Business Questions, in the Chamber, on the day after the Commission's meeting:

I am delighted that the House of Commons Commission has decided to support fully the three main recommendations of Dame Laura Cox's report, namely the removal of the previous complaints procedures that are considered not fit for purpose, the call for an entirely independent process to handle complaints, and the inclusion of historical allegations. I believe that this is an important first step in our root-and-branch reform of the culture of this House.

We need to create an internal movement that looks at everything and everyone, and ensures that we all treat each other with respect. We know that more than 200 people came forward to give their testimonies to help Dame Laura to form her opinions, and we owe it to each and every one of them to get this right. Specifically, I am very keen to see the establishment of an independent body to hear and adjudicate on all allegations of bullying, harassment and sexual misconduct as soon as possible. Knowing that there is a safe place—a haven—for staff and Members of Parliament to approach when things go badly wrong should send out the strongest signal yet that we are listening, we have heard, and we are willing to change.¹²⁷

At Business Questions on 25 October 2018, Andrea Leadsom announced that there would be a general debate on Dame Laura Cox's report on Monday 5 November.¹²⁸

Later at Business Questions, Justin Madders said that he was pleased to hear the statements in support of implementing the Cox report. He noted that "a truly independent arbitration process ... may well need legislation". He asked the Leader of the House to commit to securing

¹²⁶ House of Commons, [Statement from the House of Commons Commission on the Dame Laura Cox Report](#), 24 October 2018

¹²⁷ [HC Deb 25 October 2018 c448](#)

¹²⁸ [HC Deb 25 October 2018 c448](#)

enough time to implement such legislation during this Session. In response, Andrea Leadsom said that:

I am sure that the hon. Gentleman fully appreciates that I cannot stand at the Dispatch Box and determine legislation right now with no thought of either what the House wants to do, or what those we would wish to consult—the victims—would like to happen. However, I can absolutely assure him that I am determined to grasp this awful problem and to stamp out bullying and harassment once and for all, wherever we see it in this place.¹²⁹

6.4 Debate on the Cox Report

On 5 November 2018, the House held a general debate on Dame Laura Cox's report - *The Bullying and Harassment of House of Commons Staff – Independent Inquiry Report*.¹³⁰

Appendix 2, in a separate document on the [landing page](#) for this briefing paper, reports on this debate.

¹²⁹ [HC Deb 25 October 2018 c465](#)

¹³⁰ [HC Deb 5 November 2018 cc1277-1312](#)

7. Work on Dame Laura Cox's key recommendations

As noted above the first of Dame Laura's recommendations was accepted by the House of Commons Commission:

We have therefore agreed to the three fundamental recommendations highlighted by Dame Laura on page 6 of her report.

1. We are terminating the Valuing Others Policy, and have suspended operation of the Respect Policy recommending that the House terminate it as soon as possible;
2. We recommend that the House amend the new Independent Complaints and Grievance Scheme to ensure that those House employees with complaints involving historical allegations can access the new Scheme;
3. We recommend that the House consider the most effective way to ensure 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.

The Cox Report was debated on 5 November 2018 (see Appendix 2, in a separate document on the [landing page](#)). Since then the House of Commons Commission and the Commons Executive Board have made some progress on the remaining recommendations (2 and 3).

7.1 Historical allegations

At its meeting on 23 November 2018, the Commons Executive Board noted that a consultation on non-recent cases of bullying, harassment and sexual harassment would be launched on 26 November. The consultation closed on 17 December 2018.¹³¹

On 25 February 2019, the House of Commons Commission agreed that

there should be a bespoke structure for the independent investigation of non-recent complaints, parallel to the ICGS structure, and providing for the ultimate role of the Parliamentary Commissioner for Standards. Its proposal would be passed to the Leader of the House for her to put to the House for agreement.

The Commission also noted the responses to the consultation exercise.¹³²

However, on 29 April 2019, the Commission agreed to consider a revised Scheme at its meeting on 20 May.¹³³

On 20 May 2019, the Commission:

¹³¹ [Historical cases consultation](#), 26 November 2018. A news article was re-issued to note the closing of the consultation – House of Commons news, [Consultation: non-recent cases of bullying, harassment and sexual harassment](#), 26 November and 17 December 2018; Commons Executive Board, [Decisions of the Board – 23 November 2018](#), Item 3

¹³² House of Commons Commission, [Decisions – 25 February 2019](#), Item 2; [Consultation responses – non-recent cases](#)

¹³³ House of Commons Commission, [Decisions – 29 April 2019](#), Item 1c

- Identified and agreed a process for handling non-recent cases of bullying, harassment and sexual misconduct;
- Agreed the timeline for consultation, agreement and implementation;
- Agreed to review the outcome of the consultation at its meeting on 24 June 2019 and accept the revised report. The House could then consider the motion and report at the end of June.¹³⁴

A consultation was issued on 21 May 2019 and closed on 14 June 2019. Details are set out in Box 5.

Box 5: Consultation proposal for non-recent cases

The House of Commons Commission met on 20 May 2019 and discussed the issue of non-recent complaints of bullying, harassment and sexual misconduct.

They agreed unanimously to consult on the following proposal for dealing with non-recent cases, by using the existing ICGS scheme, and employing specialist investigators for both assessing and investigating non-recent (and recent) cases:

- The complainant would initially call one of the Helplines (either the Independent bullying and Harassment Reporting Helpline or the Independent Sexual Misconduct Advisory Service) and be offered support, including access to the Parliamentary Health and Wellbeing Service;
- Appropriately skilled and experienced investigators would be employed to investigate non-recent cases;
- By using the ICGS scheme, non-recent cases would be treated in the same way as current cases throughout the whole procedure, with the same assessors, the same steps, and the same decision-makers;
- The ICGS allows for informal resolution at any stage and, as Dame Laura Cox states in paragraph 336 of her report, not all cases are disputed. An apology might be the informal resolution that the complainant is seeking.

Please note:

- Both non-recent and current cases would be covered by the ICGS, ensuring equality of process;
- The current ICGS system would be strengthened, by adding to the pool of available expertise, knowledge, skills and experience;
- This would promote consistency of reporting and investigation, for both complainants and respondents;
- A panel (consisting, for example, of the Parliamentary Commissioner for Standards, an external representative, Speaker's Counsel and a lay member of the Committee on Standards, observed by a member of the TUS) could interview and choose high-quality, experienced candidates for the roles of investigators, who have the appropriate skillset to deal with non-recent and recent cases;
- It would be simple to incorporate any future changes to the system, arising from Alison Stanley's six-month review of the ICGS scheme;
- This proposal follows Dame Laura Cox's recommendations (as set out in paras 312 to 349 of her report).

The issue of reparation will be dealt with separately by the House Service.

Consultation arrangements

Ensuring that the system of dealing with non-recent cases is trusted by all is a crucial step in changing Parliament's culture for good. We are eager to hear from a diverse range of voices and views before the proposal is taken to the House. Please respond to any aspect of the proposal.

This proposal is now open for public consultation until 6pm, Friday 14 June.¹³⁵

¹³⁴ House of Commons Commission, [Decisions – 20 May 2019](#), Item 4

¹³⁵ House of Commons news, [Consultation proposal for non-recent cases](#), 21 May 2019

At its meeting on 24 June 2019, the House of Commons Commission agreed to include non-recent cases in the ICGS.¹³⁶ It issued a statement, confirming that “Subject to approval by the House, implementation work will take place over the summer, including the recruitment of a bank of additional expert independent investigators, with the intention of opening up the Scheme to non-recent cases from October this year”.¹³⁷

On 11 June 2019, the Leader of the House said that the Government was “bringing forward a motion that will implement the important recommendation in Dame Laura Cox’s report that historic cases should be in scope as part of the independent complaints and grievance scheme”.¹³⁸ He announced that the debate would take place on 17 July 2019.¹³⁹

Commission proposals agreed

On 17 July 2019, the debate went ahead and the House of Commons agreed the following motion:

That this House endorses the report of the House of Commons Commission entitled Extending the Independent Complaints and Grievance Scheme (HC 2554) and laid on Monday 15 July and approves the steps set out in paragraph 8 of the report to make the changes necessary to extend the scheme, endorsed under the resolution of 19 July 2018.¹⁴⁰

[*Extending the Independent Complaints and Grievance Scheme*](#) was published following the Commission’s meeting on 15 July 2019.

Paragraph 8 of the report proposed the following changes to the ICGS:

- a. Replace Section 5.3 of the Bullying and Harassment Policy with “Complaints predating the start of the 2017 Parliament can also be investigated under this policy and will be assessed using the current accepted behaviour regime.”;
- b. Replace Section 15.2 of the Sexual Misconduct Policy with “All members of the present and past Parliamentary Community as set out in section 9 (Scope) of the Sexual Misconduct Policy can access the ISMA Service for advice and support”;
- c. Replace Section 15.3 of the Sexual Misconduct Policy with “People who have concerns about behaviour prior to the start date of the 2017 Parliament can raise a complaint using the current scheme”;
- d. In the Bullying and Harassment Policy, in para 4.1, replace “any member” with “any present or former member”, in para 4.2, replace “all those working for or with” with “all those who have worked for or with or who are currently working for or with”.

The Commission’s report recognised that “none of the proposals in this paper would apply to staff of the House of Lords Administration or to Members of the House of Lords or their staff, until the appropriate

¹³⁶ House of Commons Commission, [Decisions – 24 June 2019](#), Item 1

¹³⁷ House of Commons, [Independent Complaints and Grievance Scheme \(ICGS\): non-recent cases and six-month review](#), 26 June 2019

¹³⁸ [HC Deb 11 July 2019 c461](#)

¹³⁹ [HC Deb 11 July 2019 c459](#)

¹⁴⁰ [HC Deb 17 July 2019 cc919-921](#)

Lords authorities agree to these or similar arrangements".¹⁴¹ (The House of Lords agreed processes for historic cases on 16 March 2020, see section 1.3.)

7.2 An entirely independent process

At its meeting on 17 December 2018, the Commission agreed that:

... a small informal working group should be established to examine and report on the third key recommendation made by Dame Laura Cox in relation to the independence of the process for determining complaints of bullying, harassment or sexual harassment brought by House staff against Members of Parliament.¹⁴²

At its meeting on 25 February 2019, the Commission "made progress on agreeing the membership of the informal working group on the determination of complaints without MP involvement, which will comprise a balance between MPs and independent members". It expected to be able to confirm and announce the membership "shortly".¹⁴³

At its meeting on 29 April 2019, the Commission reviewed the prospective membership for the working group on determination without Member involvement and agreed it would be finalised by correspondence.¹⁴⁴

On 10 June 2019, a House of Commons news item announced "The creation of a staff team to lead on producing options on implementation for the Commission" on entirely independent process for determining complaints. The press notice continued that:

This team will include members with procedural and legal knowledge, as well as expertise in the operation of the Independent Complaints and Grievances scheme - as well as any other resource that may be required. They will also work closely with the Parliamentary Commissioner for Standards, and may draw on other resources as required.

[...]

These options will be presented to the Commission, who will select their preferred option and then open it for public consultation.¹⁴⁵

The Commission received a number of options from the staff team. At its meeting on 10 February 2020, it agreed its preferred option for implementing the recommendation, which would involve the setting up of a new independent panel of experts with the power to determine

¹⁴¹ House of Commons Commission, [Extending the Independent Complaints and Grievance Scheme](#), 15 July 2019, HC 2554 2017-19, para 10

¹⁴² House of Commons Commission, [Decisions – 17 December 2018](#), Item 1

¹⁴³ House of Commons Commission, [Decisions – 25 February 2019](#), Item 3

¹⁴⁴ House of Commons Commission, [Decisions – 29 April 2019](#), Item 1a

¹⁴⁵ House of Commons news, [Progress on Dame Laura Cox recommendations – Commission update](#), 10 June 2019. In the debate on 18 June 2019, Valerie Vaz outlined the background to the change of approach [[HC Deb 18 June 2019 c199](#)]

ICGS cases and decide on sanctions; and agreed that formal consultation on the selected preferred option be undertaken.¹⁴⁶

At its meeting on 27 April 2020, the Commission confirmed the implementation for its preferred option, including the following aspects of the implementation plan:

- The House would be asked to consider whether or not there should be a time-limited debate led by a member of the House of Commons Commission in the very rare circumstances where it is asked to implement a sanction of suspension or expulsion of a Member following a panel determination;
- The independent expert panel would not include a former Member;
- The Independent Expert Panel would adopt the Committee on Standards appeals framework;
- The recruitment process would select a Chair for the panel;
- The Independent Expert Panel would use the confidentiality processes established by the Committee on Standards; and
- The Commons Executive Board, in conjunction with the Commission, would finalise the person specification and conduct the recruitment process.¹⁴⁷

A separate statement on the independent complaints process noted that the proposals would need to be considered in the House. If they were approved, an Independent Chair and seven expert panel members would be recruited. Neither the Chair nor any members of the panel would be MPs.¹⁴⁸

Establishment of the Independent Expert Panel

On 23 June 2020, the House agreed to the establishment of an Independent Expert Panel to consider cases against MPs raised under the ICGS. It agreed to the functions and responsibilities of the Panel, the method of appointing the Panel and made consequent changes to Standing Orders. The House also agreed an amendment to ensure that any decisions relating to recommendations made by the Panel that needed to be ratified by the House should be decided without debate in the Chamber.

Its functions are:

- a) to determine the appropriate sanction in ICGS cases referred to it by the Parliamentary Commissioner on Standards;
- (b) to hear appeals against the decisions of the Parliamentary Commissioner for Standards in respect of ICGS cases involving Members of this House;
- (c) to hear appeals against a sanction imposed under paragraph (a);

¹⁴⁶ House of Commons Commission, *Decisions – 10 February 2020*, Item 2; House of Commons, [Cox III: Consultation Paper](#), undated

¹⁴⁷ House of Commons Commission, *Decisions – 27 April 2020*, Item 2

¹⁴⁸ House of Commons news, [Commission statement: Independent complaints process](#), 29 April 2020 [intranet link]

(d) to report from time to time, through the Clerk of the House, on the operation of the ICGS as it relates to Members of this House.¹⁴⁹

Appointment of the Independent Expert Panel

On 25 November 2020, the House approved the appointment of the first eight members of the Panel,¹⁵⁰ as recommended by the House of Common Commission, in its report *Members of the Independent Expert Panel: Nomination of Candidates*.

The Commission outlined the process followed in recruiting and selecting those nominated. It recommended that four candidates should be appointed for the maximum term of six years and that four candidates, including the proposed Chair of the Panel, should be appointed for four years. It provides brief details of the nominated candidates, who are:

Six-year terms:

Monica Daley
Miss Dale Simon
Sir Peter Thornton
Dr Matthew Vickers

Four-year terms

Mrs Lisa Ball
Mrs Johanna Higgins
Sir Stephen Irwin (Chair)
Professor Clare McGlynn¹⁵¹

Information on the Independent Expert Panel

[Information about the Panel](#), including its membership; procedures and guidance; reports; and correspondence, can be found on the parliamentary website.

7.3 Debate on progress of implementation of the recommendations of the Cox Report

On 18 June 2019, the House resolved:

That this House welcomes the publication of, and recommendations in, the Dame Laura Cox report on bullying and harassment in Parliament; welcomes the implementation of the recommendation to abandon the Valuing Others and Respect policies; expresses concern about damage caused to the reputation and standing of this House by the lack of progress made on other recommendations on historical allegations and the non-involvement of MPs in Independent Complaints and Grievance Scheme cases; and calls on the Leader of the House and the House of Commons Commission to push forward the implementation of all three key recommendations in full without delay.¹⁵²

At the end of the debate, Maria Miller observed that

Not one hon. Member who is not a member of the House of Commons Commission has spoken against this motion. That sends a loud message to the House of Commons Commission,

The debate followed Maria Miller's [application to the Backbench Business Committee](#) on 11 June 2019.

¹⁴⁹ HC Deb 23 June 2020 cc1244-1272; for a brief account of the debate, see the Library Briefing Paper, [Independent Complaints and Grievance Scheme: independent investigations](#), CBP 08944

¹⁵⁰ [HC Deb 25 November 2021 cc875-887](#)

¹⁵¹ House of Common Commission, [Members of the Independent Expert Panel: Nomination of Candidates](#), 19 November 2020, HC 998 2019-21

¹⁵² [HC Deb 18 June 2019 c206](#)

including those right hon. and hon. Members here today, that they must bring forward policies and procedures to ensure that non-recent allegations are dealt with now and that independent processes, as described by Cox, are put in place.¹⁵³

During the course of the debate, there was criticism of the slow response to the Cox Report. Vicky Ford reported that “Dame Laura expressed concern about her recommendations becoming bogged down in process through, for example, the setting up of working groups and advisory panels”.¹⁵⁴

However, Pete Wishart, who had recently been appointed to the House of Commons Commission, commented that:

It is important that we get this right, which is why some of the conversations and negotiations that are required have to be played out so we get to the right solution, and I believe we are getting there. We owe it to the House to get to the right place. We have to make progress, and we have to deal with this.¹⁵⁵

Valerie Vaz, Shadow Leader of the House of Commons and a member of the Commission, noted the hard work that had gone into making the progress that had been made, and outlined the consultations that needed to take place to ensure the process of investigating and sanctioning was independent.¹⁵⁶

Mel Stride, the then Leader of the House, acknowledged that “while we have not moved fast enough and I accept that, we should not overlook the progress that we have made”.¹⁵⁷ He anticipated work on historic cases being concluded “as quickly as possible” and hoped that the staff group considering the independent process would report in the autumn.¹⁵⁸

Throughout the debate, there were calls for changes to the way in which the House of Commons Commission operates.¹⁵⁹

Tom Brake, the Commission’s spokesperson in the House, thought that there was a collective desire “to ensure that we run the Commission more effectively than has perhaps been the case so far”.¹⁶⁰

Mel Stride did not rule out future discussions on the way the Commission operates.¹⁶¹

¹⁵³ [HC Deb 18 June 2019 cc205-206](#)

¹⁵⁴ [HC Deb 18 June 2019 c179](#)

¹⁵⁵ [HC Deb 18 June 2019 c191](#)

¹⁵⁶ [HC Deb 18 June 2019 c201](#) and c200

¹⁵⁷ [HC Deb 18 June 2019 c203](#)

¹⁵⁸ [HC Deb 18 June 2019 c205](#)

¹⁵⁹ [HC Deb 18 June 2019 c164](#), [c174](#), [c175](#)

¹⁶⁰ [HC Deb 18 June 2019 c178](#)

¹⁶¹ [HC Deb 18 June 2019 c204](#)

8. Implications of the Cox Report for the House's standards system

8.1 Standards Committee: initial proposals

On 10 December 2018, the Committee on Standards' report, *Implications of the Dame Laura Cox report for the House's standards system: Initial proposals*, was published.¹⁶²

The Committee reviewed the recommendations made by Dame Laura that related to the House's standards system. The Committee noted Dame Laura's recommendations that the investigation of complaints should be independent; that there should not be restrictions on complaints about misconduct that occurred before June 2017.

Until the House decides otherwise, the ICGS operates as provided for its decisions of July 2018, with the Committee on Standards having a role in the appeal function under the ICGS.¹⁶³

However, the Committee brought forward some "proposals for immediate action". It recommended that full voting rights should be extended to lay members of the Committee.

The Committee believed this would increase the independence of the Committee. Giving lay members full voting rights would give lay members a majority on the Committee as under House practice a chair only votes if a casting vote is required. (There are seven parliamentary members and seven lay members on the Committee.)

In July 2018, the House allowed an indicative vote of all members – lay and parliamentary – on the Committee but did not allow lay members to have a formal vote or to move motions in Committee proceedings. The Committee acknowledged that there was a small risk that allowing lay members to vote:

... we also acknowledged that an argument against doing this is the fear that it might open the work of the Committee to challenge in the courts on the grounds that it is not a properly constituted select committee entitled to the protection of Article IX of the Bill of Rights 1689.¹⁶⁴

To avoid this risk, the Committee recommended, in its July 2018 report, that the Government bring forward legislation "to guarantee that the Committee's proceedings would remain protected by parliamentary privilege following the extension of full voting rights to lay members".¹⁶⁵

The Committee also made recommendations to increase the independence of the Parliamentary Commissioner for Standards. It

¹⁶² Committee on Standards, *Implications of the Dame Laura Cox report for the House's standards system: Initial proposals*, 10 December 2018, HC 1726 2017-19

¹⁶³ *Ibid*, para 11

¹⁶⁴ *Ibid*, para 43

¹⁶⁵ *Ibid*, para 44 and Committee on Standards, *Independent Complaints and Grievance Policy: Implementation*, 13 July 2018, HC 1396 2017-19, para 36

recommended that the Commissioner should no longer need the Committee's permission to initiate an inquiry into either a former Member or a matter which goes back more than seven years.¹⁶⁶ It also recommended amending the protocol between the Commissioner, the Committee and Metropolitan Police to allow the Commissioner to refer cases to the police without the permission of the Committee.¹⁶⁷ Finally, the Committee recommended that the Commissioner should accept complaints submitted by email.¹⁶⁸

8.2 Debate on the initial proposals

The Committee's report was debated on 7 January 2019, when the motion before the House provided for the House to approve the report and make the necessary changes to Standing Orders and the Guide to the Rules relating to the Conduct of Members to implement the Committee's recommendations.¹⁶⁹

Andrea Leadsom opened the debate and said, if agreed, the recommendations would "strengthen the independence of the Committee on Standards and modernise its practices".¹⁷⁰

The motion related to the third of Dame Laura Cox's recommendations – concerning the independence of the ICGS process. The Commission was considering how to take the recommendation forward (see section 7.3), and in the interim these proposals enhance the Committee's independence.¹⁷¹

The change to voting rights would mean that "in practice, that lay members will have equal status on the Committee and will hold a majority in any vote, with the Chair holding a casting vote only in the event of a tie, and it goes some way towards meeting Laura Cox's challenge".¹⁷²

Valerie Vaz raised concerns about the application of parliamentary privilege to lay members of the Committee on Standards.¹⁷³

Kate Green, Chair of the Committee on Standards, said that it was "imperative" to "ensure that the public see we are serious about independence and fairness in the system" because the Committee could find itself dealing with appeals "very shortly".¹⁷⁴

The House agreed to the motion, without a division.¹⁷⁵

¹⁶⁶ *Ibid*, paras 52-56

¹⁶⁷ *Ibid*, paras 57-61

¹⁶⁸ *Ibid*, paras 62-64

¹⁶⁹ House of Commons, [Order Paper](#), 7 January 2019

¹⁷⁰ [HC Deb 7 January 2019 c124](#)

¹⁷¹ HC Deb 7 January 2019 c126

¹⁷² HC Deb 7 January 2019 cc126-127

¹⁷³ HC Deb 7 January 2019 c130

¹⁷⁴ HC Deb 7 January 2019 c134

¹⁷⁵ HC Deb 7 January 2019 c135

9. Other inquiries and other developments

9.1 House of Commons Members' staff

Inquiry by Gemma White QC

On 17 July 2018, the resolution of the House that provided for the implementation of the ICGS, also provided for “a further independent inquiry in similar terms be established, by the Clerk of the House in consultation with the relevant authorities in the House of Lords as appropriate, to consider allegations of bullying and harassment in respect of those individuals including MPs and their staff, where those allegations are not in scope of the Dame Laura Cox QC inquiry”.¹⁷⁶

On 6 November 2018, the inquiry was launched. It was undertaken by Gemma White QC. Her terms of reference were published on the same day. The objectives of her inquiry are set out in Box 6. She set a deadline of 15 January 2019 for submissions.

In a letter to Alison Stanley's Independent Six-month Review of the ICGS, Gemma White QC said that she anticipated reporting to the House in June 2019.¹⁷⁷

Box 6: Inquiry into Bullying and Harassment by Gemma White QC

The objectives of the Inquiry are

- To establish the nature and extent of bullying and harassment (including sexual harassment and any systemic behaviours) by past and present Members of Parliament and those working on their behalf, of past and present staff of Members of Parliament and of other people engaged in Parliamentary work on their behalf, and of Members of Parliament themselves;
- To identify any themes or patterns as to how previous complaints about such behaviour were handled or how complainants were treated, or, if no informal or formal complaint was made, the reasons for this;
- To use the experiences of those offering their testimony to consider and comment on the extent to which those working in the Parliamentary Community have been treated with dignity and respect and the extent to which the Parliamentary Community has been open and supportive;
- To consider and make recommendations on the options available to the House of Commons in respect of allegations dating from before June 2017 and to consider and comment on the Independent Complaints and Grievance Scheme as a means of investigating allegations post-dating June 2017, taking into consideration the recommendations made by Dame Laura Cox in her report of 15th October 2018.¹⁷⁸

Gemma White's report

Gemma White QC's report on bullying and harassment of past and present staff of Members of Parliament, as well as Members themselves, was published on 11 July 2019:

- [*Bullying and Harassment of MPs' Parliamentary Staff – Independent Inquiry Report*](#), 11 July 2019, HC 2206 2017-19

¹⁷⁶ [HC Deb 19 July 2018 cc658-660](#)

¹⁷⁷ Alison Stanley, [Independent 6-month Review](#) [intranet link], 31 May 2019, Appendix

¹⁷⁸ House of Commons, [Inquiry into bullying and harassment of MPs' staff launches](#), 6 November 2018 [intranet]

She set out her key conclusions:

- Some staff of Members of Parliament are subject to an unacceptable risk of bullying and harassment, including sexual harassment, at work. Most Members of Parliament treat their staff with dignity and respect but the problem of bullying and harassment is sufficiently widespread to require an urgent collective response.
- Recent steps taken by the House of Commons to address bullying and harassment across the Parliamentary community do not engage sufficiently with the particular issues faced by Members' staff, who are in a uniquely vulnerable position because they are directly employed by Members of Parliament. Many describe the idea of complaining about bullying and harassment under the new complaints procedure as "career suicide". They also often have strong party and personal loyalties which constitute significant barriers to complaint.
- To date, the group of MPs' staff who would be most likely to bring a complaint under the new Independent Complaints and Grievance Scheme, namely former staff of MPs, have been denied the right to do so. This limitation must be removed so that they have the opportunity to hold MPs to account. They must also be permitted to complain about events which took place before June 2017 (the current cut-off date) as recommended by Dame Laura Cox.
- Since few staff will complain in any event, other methods of tackling workplace bullying and harassment must be employed. Voluntary training is not the answer: only 34 out of 650 MPs and 135 out of 3200 MPs' staff have attended or booked onto the Valuing Everyone training designed to support the new Behaviour Code introduced in July 2018.
- There must be a fundamental shift away from regarding Members of Parliament as "650 small businesses" with near complete freedom to operate in relation to their staff. Members of Parliament must be required to adopt and follow employment practices and procedures which are aligned with those followed in other public sector workplaces.
- This shift must be supported by a properly resourced and staffed department within the House of Commons. It should develop and implement a coherent and robust approach to Members' employment practice and provide support to Members and their staff. Any necessary enforcement mechanisms (such as imposing conditions related to good employment practice on MPs' entitlement to staffing expenditure) should be considered by the Independent Parliamentary Standards Authority in conjunction with the new department.

The House of Commons Commission issued a statement, thanking Gemma White for her report. The Commission would "look urgently at the recommendations she makes when we meet on Monday 15th July 2019". It noted that it does not employ the staff of MPs. However, "the Commission takes very seriously its responsibility to ensure that Parliament is a modern workplace". It noted progress that had been

made in implementing the Independent Complaints and Grievance Scheme.¹⁷⁹

Debate on Gemma White's Report, 17 July 2019

Mel Stride, then the Leader of the House of Commons, opened a debate on Gemma White's report on 17 July 2019. He thanked her for her report and welcomed her acknowledgement that progress had been made on the ICGS.¹⁸⁰

Mr Stride thought that the speed at which the debate on the report had been brought forward was a "healthy sign". He continued that:

We need now to continue to proceed at pace, to come to our conclusions on the recommendations of the report as soon as possible, and to bring forward further much-needed change at the earliest possible opportunity. We owe that to those who do so much to support us as Members of Parliament, but we owe it also to those who send us here and who in turn rightly expect the highest possible standards of each and every one of us.¹⁸¹

A number of speakers in the debate expressed support for a HR department to support Members' staff. Members also commented on the progress of developing the ICGS.

Justin Madders welcomed the changes to allow past cases to be investigated but highlighted the importance of independence, saying, "it is clear to me that, without effective sanctions and a truly independent complaints panel, we will not have true justice".¹⁸² He also welcomed the Commission's statement of its intention to consult on the implementation issues that would face the HR department.¹⁸³

Mel Stride noted that it was not clear whether the HR role fell to the House or to IPSA and cautioned that:

We must have that debate, which is why sometimes these things take a little time. It should not take longer than it needs to, but we need to work our way around the human resources recommendation in particular, to make sure that that aspect is absolutely right in every possible detail.¹⁸⁴

HR support for Members' staff

At its meeting on 31 October 2019, the Commission considered a letter from IPSA on implementing Gemma White's recommendations and "agreed to consult the unions and the parties on the options for providing a Members' staff HR function, including the basis for its provision".¹⁸⁵

Then on 13 January 2020, the Commission:

... endorsed in principle the creation of a Members' Services Team, subject to agreement on funding; and considered the potential provision of support for MP staff representatives. It

¹⁷⁹ House of Commons, [Gemma White QC's report and Commission statement](#), 11 July 2019

¹⁸⁰ [HC Deb 17 July 2019 cc883-884](#)

¹⁸¹ [HC Deb 17 July 2019 c885](#)

¹⁸² [HC Deb 17 July 2019 c910](#)

¹⁸³ [HC Deb 17 July 2019 c911](#)

¹⁸⁴ [HC Deb 17 July 2019 c915](#)

¹⁸⁵ House of Commons Commission, [Decisions](#), 31 October 2019, Item 5

agreed to further consider both issues at its meeting on 10 February.¹⁸⁶

A further paper, entitled *Gemma White QC's recommendations: Creation of a Members' Services Team* was noted on 10 February.¹⁸⁷ In response to a parliamentary question on 19 May 2020, Pete Wishart, answering on behalf of the House of Commons Commission, confirmed that "In February this year, the House of Commons Commission agreed to establish the Member Services Team, which will deliver the recommendations of Gemma White QC".¹⁸⁸

9.2 House of Lords

On 5 November 2018, the House of Lords Commission agreed that an independent Inquiry into the culture of the House of Lords as a workplace should be undertaken with a specific emphasis on determining the nature and extent, if any, of bullying and harassment in the House of Lords and to make appropriate recommendations as necessary to improve the workplace environment. The Commission tasked its external members with appointing an independent expert to lead the Inquiry and with developing Terms of Reference in collaboration with that person.¹⁸⁹

On 19 December 2018 it was announced that Naomi Ellenbogen QC had been appointed to lead the Inquiry. A press release and the Terms of Reference of the Inquiry were published on the parliamentary intranet.

The original deadline for submitting written evidence was 18 January 2019. This was extended to 31 January.¹⁹⁰

Naomi Ellenbogen's report

Naomi Ellenbogen QC's report, *An Independent Inquiry into Bullying and Harassment in the House of Lords*, was published on 10 July 2019. She summarised her findings, in her executive summary:

16.1. Over the period to which the inquiry relates:

16.1.1. the prevailing culture and behaviours in the House of Lords, as a place of work, have not been conducive to an open and supportive culture to ensure that all those working there are treated with dignity and respect;

16.1.2. staff have bullied and harassed other staff. Members have bullied and harassed staff.

16.2. In each case, the behaviours recorded have been largely generated and fostered by the structural complexities of the organisation and its working practices.

16.3. On the whole, staff who have experienced bullying and harassment have tended not to complain, formally or otherwise, in the belief that nothing will happen and/or for fear of reprisal.

¹⁸⁶ House of Commons Commission, [Decisions](#), 13 January 2020, Item 5

¹⁸⁷ House of Commons Commission, [Decisions](#), 10 February 2020, Item 6

¹⁸⁸ [HC Deb 19 May 2020 c478](#)

¹⁸⁹ House of Lords Commission, [Minutes – 5 November 2018](#), Item 2

¹⁹⁰ House of Lords, [House of Lords independent Inquiry into bullying and harassment](#)

16.4. Staff policies and procedures will require some amendment, as will the rules and procedures applicable to members of the House of Lords and the staff whom they employ personally. All amendments will be designed to allay fears that any complaint will be met with apathy and/or reprisal and to instil and maintain confidence that complaints will be properly handled.¹⁹¹

9.3 Cultural transformation

The House of Commons recruited an Independent Director – Cultural Change, Julie Harding, to “set a transformation strategy for change [and] also work out how we drive and deliver the tangible actions needed”. She started work in February 2019. The appointment was a one-year fixed-term appointment.¹⁹²

The new Director was supported by a ‘Lead Adviser’ and a Project Support Officer.

The ‘Lead Adviser’ was recruited in advance of the Independent Director, to ensure that they were able to start working on the action plan as soon as they arrive and to help them work effectively within the parliamentary structures and context.¹⁹³

Before Julie Harding left the House the House’s values (Courageous, Inclusive, Trusted, Collaborative) and vision (Everyone has a voice) were developed. In October 2019, the Commons Executive Board agreed a ten-point action plan “through which we will begin to bring our new values (...) to life and realise our vision”. The work will be coordinated by the Cultural Transformation Team.¹⁹⁴

9.4 ICGS costs

In its report on the *House of Commons Financial Plan 2019/20 to 2022/23 and draft Estimates 2019/20*, the House of Commons Finance Committee reported that the House would need “£765k to support the introduction of the new Independent Complaints and Grievance Scheme, which the House approved in July 2018”.¹⁹⁵

The costs of the ICGS in the financial years 2019/20 and 2020/21 were reported in the Scheme’s annual report July 2019-June 2020, which spanned both financial years:

The ICGS’s total spend in FYE 19/20 was £1,632,252

[...]

The team’s total current budget for FYE 20/21 is £1,816,000¹⁹⁶

¹⁹¹ Naomi Ellenbogen, [An Independent Inquiry into Bullying and Harassment in the House of Lords](#), 10 July 2019, para 16

¹⁹² House of Commons, [Job Vacancy - Independent Director – Cultural Change](#) [intranet]

¹⁹³ House of Commons, [Job Vacancy – Lead Advisor to the Independent Director – Cultural Change; Job Vacancy – Project Support Officer](#) [intranet]

¹⁹⁴ [Decisions of the Commons Executive Board](#), 11 October 2019, Item 7; [Everyone has a voice – Action Plan](#) [intranet only]

¹⁹⁵ Finance Committee, [House of Commons Financial Plan 2019/20 to 2022/23 and draft Estimates 2019/20](#), 4 December 2018, HC 1761 2017-19, para 16

¹⁹⁶ [Independent Complaints and Grievance Scheme Annual Report \(July 2019-June 2020\)](#), November 2020, para 9 [intranet link]

About the Library

The House of Commons Library research service provides MPs and their staff with the impartial briefing and evidence base they need to do their work in scrutinising Government, proposing legislation, and supporting constituents.

As well as providing MPs with a confidential service we publish open briefing papers, which are available on the Parliament website.

Every effort is made to ensure that the information contained in these publicly available research briefings is correct at the time of publication. Readers should be aware however that briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

If you have any comments on our briefings please email papers@parliament.uk. Authors are available to discuss the content of this briefing only with Members and their staff.

If you have any general questions about the work of the House of Commons you can email hcenquiries@parliament.uk.

Disclaimer

This information is provided to Members of Parliament in support of their parliamentary duties. It is a general briefing only and should not be relied on as a substitute for specific advice. The House of Commons or the author(s) shall not be liable for any errors or omissions, or for any loss or damage of any kind arising from its use, and may remove, vary or amend any information at any time without prior notice.

The House of Commons accepts no responsibility for any references or links to, or the content of, information maintained by third parties. This information is provided subject to the [conditions of the Open Parliament Licence](#).