



BRIEFING PAPER

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The Service complaints system

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Summary

The Service complaints system provides a means for serving or former personnel to make a complaint if they feel they have been wronged on a matter occurring whilst serving in the armed forces. The system has “never been efficient, effective or fair”¹ according to the Service Complaints Ombudsman, who provides independent oversight of the system. Parliament, and the Defence Committee, has taken a keen interest in efficacy of the system and the handling of complaints of bullying, harassment and discrimination.

A review of inappropriate behaviours in the armed forces - the Wigston review – found a “pressing need” to reform the Service complaints system. Accepting his recommendations, the Defence Secretary said the first changes to the system will be rolling out in early 2021.² Changes to the time limits for appealing a decision are being made in the Armed Forces Bill 2019-21, which had its Second Reading on 8 February 2021. The Bill also creates a new complaints commissioner for the Service police.

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¹ [Service Complaints Ombudsman Annual Report 2019](#)

² [HCWS629](#), 8 December 2020

1. The Service complaints system

The Service complaints system provides a means for serving or former personnel to make a complaint about the treatment they received while subject to service law. This can include complaints of bullying, harassment or discrimination.

Box 1: Legal foundations – the Armed Forces Act 2006

The Service complaints system was introduced by the *Armed Forces Act 2006* and came into effect in 2008. It replaced the separate single Service legislation and processes which had previously existed.³ At the same time the Government created a separate office of the Service Complaints Commissioner to provide independent oversight of the internal complaints system. The Commissioner's role was converted into an Ombudsman by the *Armed Forces (Service Complaints and Financial Assistance) Act 2015*, which amended the *Armed Forces Act 2006*.

Regulations are set out in the:

- Armed Forces (Service Complaints) Regulations 2015
- Armed Forces (Service Complaints Miscellaneous Provisions) Regulations 2015
- Armed Forces (Service Complaints Ombudsman Investigations) Regulations 2015
- Armed Forces (Service Complaints and Financial Assistance) Act 2015 (Transitional and Savings Provisions) Regulations 2015.

Detailed guidance on the complaints procedure and on bullying and harassment can be found in:

- [JSP 831 Redress of individual grievances](#) – this provides guidance on the procedures in relation to service complaints.
- [JSP 763 bullying and harassment complaints procedure](#) – this provides guidance on making, responding to, advising on, investigating and deciding on, complaints of bullying and harassment.

1.1 Evolution of the system

The current system was introduced by the *Armed Forces Act 2006* and amended by the *Armed Forces (Service Complaints and Financial Assistance) Act 2015* (see box 1). The latter converted the office of the Service Complaints Commissioner into an Ombudsman, with additional powers, and streamlined the complaints process. The Act requires the Ombudsman to report to Parliament annually on whether the system is efficient, effective and fair. Neither the Ombudsman nor the Commissioner assessed the system to be so.

Parliament, and in particular the Defence Committee, has taken a keen interest in the workings of the Service complaints system. This has been prompted in part by some high-profile cases of bullying and harassment. The Defence Committee reported in 2019 on the work of the Service Complaints Ombudsman.

About the Service complaints system

This section provides a simple overview of the system. Full guidance of the procedures can be found in [JSP 831](#) and on Gov.uk: [Armed forces service complaints process](#).

Who can make a Service complaint?

The system is open to those who are, or have been, subject to service law and wish to complain about an alleged wrong relating to their service which occurred while they were

³ The *Army Act 1955*, the *Air Force Act 1955* and the *Naval Discipline Act 1957*.

subject to service law. This can include complaints of bullying, harassment and discrimination.

Is the complaint admissible?

A Service complaint must be made within three months. A complaint made three months after the matter complained about will be ruled out of time, although the specified officer who receives the complaint can rule it in time if they consider it just and equitable to do so.⁴

The Ombudsman can overturn a decision that a complaint is inadmissible. Such a decision is binding. An individual has four weeks from receiving a decision of inadmissibility to apply to the Ombudsman.

Some matters, such as housing, healthcare, pay and allowances, have their own complaints processes which must be completed before a Service complaint about them can be submitted. These are known as “special-to-type” processes. Allegations of criminal offences should be dealt with through the Service justice system.

An individual may contact the Ombudsman to ask them to refer their intention to make a Service complaint to their chain of command. A referral is not a formal Service complaint.

Who decides a complaint?

The Defence Council is ultimately responsible for the decisions made in the complaints system. However, the Council usually delegates that authority and it is a decision body (a person or panel of persons) which decides the matters and grants appropriate redress.

The *Armed Forces (Service Complaints and Financial Assistance) Act 2015* amended the system to increase delegation, to allow complaints to be remedied at the lowest level.⁵

What is the appeals process?

A complainant can submit an appeal if they are not satisfied with the decision taken.

The *Armed Forces (Service Complaints and Financial Assistance) Act 2015* streamlined the complaints system by reducing it to one level of appeal, rather than two.⁶

Currently a complainant has six weeks from receipt of a decision to submit an appeal. This may be extended if it is considered just and equitable to do so. The Armed Forces Bill 2019-21, as it currently stands, will amend the *Armed Forces Act 2006* to reduce the time in which an appeal can be brought from six weeks to two weeks (with some exceptions).

Once a complainant has completed the appeal stage, they can ask the Ombudsman to investigate if they believe their complaint was handled wrongly or improperly (maladministration) or if they believe the final decision was incorrect (substance). The Ombudsman is not a further level of appeal and not all applications are accepted.⁷

⁴ Different time limits may apply if the matter being complained of has or could be the subject of a claim to the Employment Tribunal.

⁵ “[Armed Forces service complaints: factsheet on changes to complaints process](#)”, Ministry of Defence, 6 November 2015. See also House of Commons Library paper “[Armed Forces \(Service Complaints and Financial Assistance\) Bill \[HL\]](#)”, RP15-5, 23 January 2015

⁶ “[Armed Forces service complaints: factsheet on changes to complaints process](#)”, Ministry of Defence, 6 November 2015. See also House of Commons Library paper “[Armed Forces \(Service Complaints and Financial Assistance\) Bill \[HL\]](#)”, RP15-5, 23 January 2015

⁷ The Ombudsman [assesses applications for an investigation](#) into maladministration and/or substance against set criteria which includes whether there is a reasonable prospect a new investigation would result in a different outcome, whether an investigation would be a proportionate use of the Ombudsman’s powers, the redress request can be achieved, if there is a public interest in conducting an investigation.

Further background

A detailed account of how the complaints system came into being, from the Deepcut review through the Armed Forces Act 2006, to concerns about the system and calls for an Ombudsman, can be found in House of Commons Library paper "[Armed Forces \(Service Complaints and Financial Assistance\) Bill \[HL\]](#)", RP15-5, 23 January 2015.

The Service Complaints Ombudsman

The Ombudsman's role is to provide independent and impartial oversight of the Service complaints system for members of the UK armed forces. The first Ombudsman, Nicola Williams, took office at the beginning of 2016 and served a five-year term which ended in December 2020. A new Ombudsman, Mariette Hughes, took office in 2021. The full title is Service Complaints Ombudsman for the Armed Forces (SCOAF).

"The Service Complaints system has never been efficient, effective or fair, despite annual reviews since 2008".

Service Complaints Ombudsman Annual report 2019

Evolution of the Ombudsman

The *Armed Forces Act 2006* created an office of the Service Complaints Commissioner to provide independent oversight of the complaints system. The Government introduced the Commissioner role in response to recommendations made by the Deepcut Review and the Defence Select committee.⁸

While in office the Commissioner, Dr Susan Atkins, repeatedly criticised the workings of the complaints system, describing it as ineffective, overloaded and beset by delay. Dr Atkins, MPs, the Defence Committee and Liberty, the human rights group, all argued for the Commissioner's role to be converted into an Ombudsman with expanded powers.

In 2014 the Government introduced the *Armed Forces (Service Complaints and Financial Assistance) Bill* in response to these criticisms. The Bill, which received royal assent in March 2015, reformed and streamlined the complaints system, converted the Commissioner's role into an Ombudsman, and expanded the powers of the Ombudsman to investigate allegations of wrongs. The first Ombudsman, Nicola Williams, took up her post in 2016 and served a five-year term.

Box 2: Powers of the Ombudsman

The Ombudsman can:

- refer a Service personnel's intent to submit a complaint to the chain of command
- Review and overturn a decision on complaints being ruled inadmissible (for example for being out of time)
- Investigate alleged undue delay in the handling of a complaint

Following a final decision on a Service complaint, the Ombudsman can investigate:

- the substance (merits) of the claim if the complainant thinks the wrong decision was reached
- the handling of the complaint if the complainant thinks it wasn't handled correctly (maladministration)⁹

The Ombudsman does not have powers to grant redress. However, the Ombudsman can make recommendations about what redress the Service should provide if they find in favour of a complainant following an investigation.

Time limits and other eligibility criteria apply to applications to the Ombudsman.

⁸ House of Commons Library paper "[Armed Forces \(Service Complaints and Financial Assistance\) Bill \[HL\]](#)", RP15-5, 23 January 2015.

⁹ SCOAF website; [Ministry of Defence guidance](#), 6 November 2015

1.2 Criticisms of the system

Neither the Service Complaints Commissioner nor the Ombudsman assessed the complaints system to be efficient, effective and fair. The Defence Committee doubted whether the system “is fit for purpose” in a 2019 report. Liberty similarly says the system needs reform and, echoing the Ombudsman, is calling on the MOD to investigate the overrepresentation of female and BAME personnel in the complaints system.

“Female and BAME personnel are overrepresented in the Service complaints system.”

Service Complaints Ombudsman

Government commissioned reviews of inappropriate behaviour in the armed forces have also recommended changes to the system. The MOD is proposing to reduce the time available to submit a complaint in the Armed Forces Bill that is, at the time of writing, progressing through Parliament. This section looks at these commentaries and criticisms.

Ombudsman: the system is not efficient, effective or fair

The Ombudsman is required by the *Armed Forces Act 2006* to [submit an annual report](#) on the efficiency, effectiveness and fairness of the system.

In her [2019 annual report](#) the Ombudsman said:

The Service Complaints system has never been efficient, effective or fair, despite annual reviews since 2008.

The Ombudsman identified four significant problems in the system:

- Low levels of confidence - 93% of Service personnel responding to the Armed Forces Continuous Attitudes Survey 2019 who said they had experienced bullying, harassment or discrimination in the previous 12 months chose not to make a Service Complaint. A majority said it was because they didn't believe anything would be done if they did.
- Delay - none of the Services met the key performance indicator to resolve 90% of Service complaints within 24 weeks (six months). Across all three services, only 46% of complaints were resolved within 24 weeks, with the Naval Service performing the best and the Army the worst.
- Incomplete data
- Negative impact on wellbeing of those making complaints or being named in a complaint¹⁰

Career management is the most complained about area (37 per cent of complaints in 2019), followed by bullying, harassment or discrimination (25 per cent) and then complaints about pay, pensions and allowances (15 per cent).

The Ombudsman says female and BAME¹¹ personnel are overrepresented in the complaints system (23 per cent and 12 per cent) compared to their representation in the armed forces (11 per cent and 8 per cent).

The rate of complaint about bullying, harassment or discrimination is still nearly five times higher for female Service personnel than for male personnel. And 33 per cent of all Service complaints made by BAME personnel concern bullying, harassment or

¹⁰ [Service Complaints Ombudsman Annual Report 2019](#)

¹¹ The report does not provide a definition of BAME. The Wigston review, when referring to the Ombudsman's report, uses the term Black, Asian and Minority Ethnic (BAME) and explains in the glossary BAME is used to refer to members of non-white communities in the UK. [Wigston Review into inappropriate behaviours](#), Ministry of Defence, 15 July 2019, glossary.

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discrimination, compared to 23 per cent of all Service complaints made by white personnel concerning the same issue.¹²

The Ombudsman reflected on her tenure during her final oral evidence session with the Defence Committee on 13 October 2020. Ms Williams said there still needs to be a cultural change to encourage personnel to make complaints. She also suggested the Ombudsman's powers be expanded to enable her to investigate complaints on her own motion (the Ombudsman currently has no powers of 'own motion' and cannot use their powers unless asked to do so).¹³

In her final blog, in December 2020, Williams said too many recommendations from her office's annual reports remain outstanding. She identified two in particular as being key to the Service complaints system operating efficiently, effectively and fairly:

- 1 Undue delay, as outlined above, and
- 2 the disproportionate number of female and BAME Service personnel making complaints, proportionate to their numbers in the Armed Forces.¹⁴

The new Ombudsman: measuring the effectiveness of the system

The Defence Committee has previously said it is difficult to identify issues within the system when there is only one metric to measure performance objectively, namely that 90 percent of Service complaints should be resolved within 24 weeks.¹⁵

In her pre-appointment hearing with the Defence Committee, the new Ombudsman, Mariette Hughes,, discussed the need for other measures of effectiveness, namely capturing whether people who have raised complaints feel their issues have been addressed as a way of assessing effectiveness:

A fundamental part of complaints resolution is that people raise complaints because they want a particular outcome. They feel that something has gone wrong and they want it to be rectified. Measuring that satisfaction with the process and the outcome is a key part of whether a service complaints system is effective.¹⁶

Defence Committee: we doubt the system is fit for purpose

In 2019 the Committee published a report on the work of the Service Complaints Ombudsman. The Committee stated: "We seriously doubt that the current Service complaints system is fit for purpose".¹⁷

The Committee identified several issues with the complaints system, including a negative culture towards complaints which discourages personnel from complaining; the disproportionately high level of complaints from BAME and female Service personnel; that BAME and female Service personnel are more likely to complain about bullying, harassment and discrimination; slow handling of a complaint by the Services and the Ombudsman; lack of information about where the delays are; and the slow progress of

¹² [Service Complaints Ombudsman Annual Report 2019](#), p51

¹³ "[Oral evidence: Work of the Service Complaints Ombudsman](#)", Defence Committee, HC 881 2019-21, 13 October 2020, q7

¹⁴ "[Nicola Williams – my final blog as Ombudsman](#)", SCOAF, 23 December 2020

¹⁵ "[Fairness without fear: the work of the Service Complaints Ombudsman](#)", HC 1889 2017-19, 7 August 2019

¹⁶ [Oral evidence: Pre-appointment hearing for the Service Complaints Ombudsman](#), Defence Committee, HC 989 2019-21, 1 December 2020, q22

¹⁷ "[Fairness without fear: the work of the Service Complaints Ombudsman](#)", HC 1889 2017-19, 7 August 2019

the MOD in implementing recommendations made by the Ombudsman, which erodes Service personnel's confidence in SCOAF.¹⁸

The Committee also expressed concern about understaffing and inadequately resourcing of the Ombudsman's office, which has led to "large backlogs and unacceptable delays".

In their response, the MOD said the committee's recommendations would be considered alongside those of the Wigston report by an Implementation Team (see below).¹⁹

Service personnel

Over one in ten (12 per cent) personnel reported they had been subject to bullying, discrimination or harassment in the previous 12 months, but 90 per cent did not make a complaint. Of those who made a formal complaint, over half were dissatisfied with the time taken, being kept informed of progress and the outcome of the complaint process.²⁰ These figures are taken from the 2020 [Armed Forces Continuous Attitudes Survey](#) (AFCAS). The Ombudsman has suggested the MOD review the collection of data on complaints and consider whether better use can be made of the continuous attitudes surveys to capture views of the complaints system.²¹

Liberty

The human rights organisation has long campaigned for reform of the service justice and complaints systems. Liberty criticised the complaints system in a 2019 report, saying "delay and reports of unsatisfactory outcomes remain endemic".

Complainants contacting Liberty report finding the process "unbearable", particularly those that have been the victim of sexual harassment. Liberty is calling on the MOD to commission research into why so many women and BAME were complaining, noting that this was one of the Ombudsman's first recommendations in 2016. Liberty says the MOD's resulting internal review was "disingenuous" and "manifestly not what the Ombudsman had required".

Liberty made several other recommendations regarding the process, including arranging a single point of contact for sensitive or complex cases. They also call for families to be allowed to lodge a complaint, including where the service person is deceased.²²

2. Reforming the Service Complaints System

2.1 Response to defence committee

The MOD said it would consider the recommendations made by the Defence Committee in its 2019 report alongside those of the Wigston report.²³ In early 2020 the MOD informed the Committee that it had approved funding for a further five posts in the Ombudsman's office.²⁴

¹⁸ ["Fairness without fear: the work of the Service Complaints Ombudsman"](#), HC 1889 2017-19, 7 August 2019

¹⁹ ["Fairness without fear: Work of the Service Complaints Ombudsman: Government response"](#), 21 October 2019, HC 153 2019

²⁰ [Armed Forces Continuous Attitude Survey 2020](#), 21 May 2020, section 10

²¹ [Service Complaints Ombudsman Annual Report 2019](#)

²² ["Military justice: second-rate justice"](#), Liberty, January 2019

²³ ["Fairness without fear: Work of the Service Complaints Ombudsman: Government response"](#), 21 October 2019, HC 153 2019

²⁴ [Letter from Johnny Mercer to chair of Defence Committee](#), 22 January 2020

2.2 Wigston and Gray reports

In July 2019 the Ministry of Defence published the [Wigston review into inappropriate behaviours](#) in the armed forces, led by Air Chief Marshal Wigston. The Defence Secretary accepted the recommendations in full.²⁵

Wigston found a “pressing need” to reform the Service complaints system and argued that encouraging and enabling more complaints, and dealing with them better, would improve trust and signal the leadership’s determination to stamp out inappropriate behaviour.

Following the Wigston review, the MOD set up an Implementation Team to implement the recommendations made by the Wigston Review and the Defence Committee. In early 2020 Johnny Mercer, the Minister for Defence People and Veterans, informed the Defence Committee that the implementation team is reviewing the complaints process.

The MOD commissioned Danuta Gray, the Chair of MOD’s People Committee, to review progress made in implementing Wigston’s recommendations. Her report - [Unacceptable Behaviours Progress review](#) – was published in December 2020. Upon publication the MOD said it is reforming the service complaints system and “will be rolling out the first changes in the new year”.²⁶

Wigston recommendations and Gray’s review of progress

Gray said proposals to reform the complaints system were nearing completion. She said some of Wigston’s recommendations will require legislative change which is unlikely to occur before summer 2021.

The Wigston review reflected on the overrepresentation of female and BAME personnel in the complaints system and recommended Defence investigate the causes of such misrepresentation. Gray said a report on this, building on the 2019 [‘Lived Experience’](#) research, is due to report in early 2021 (Wigston recommendation 1.13).

Gray said a revised JSP 763 (bullying and harassment complaints procedures) is expected to be published in April 2021 (Wigston recommendation 1.6). This will incorporate JSP 887 on Diversity and Inclusion, and will have a section on prevention and positive behaviours linked to values and standards. There will also be a new civilian grievance policy.

Wigston recommended allocating responsibility for the reporting and handling of all serious behavioural complaints to the Defence Authority (recommendation 3.8) and for Defence to consider a two-tier complaints system, reserving the full scope of the current system for the most complex cases including bullying, harassment and discrimination (recommendation 3.10).²⁷

However, in her report Gray said that at this stage the MOD does not intend to create a central team to handle Service complaints of unacceptable behaviour, nor implement a two-tier system. Gray says this is because the proposed changes to the system should improve the way in which all complaints are handled. She goes on to explain that the changes will include “creating centralised functions within each of the single Services to look at admissibility decisions, the establishment of standing Decision Bodies which

²⁵ [Wigston Review into inappropriate behaviours](#), Ministry of Defence, 15 July 2019; [HCWS1720](#), 15 July 2019

²⁶ [HCWS629](#), 8 December 2020

²⁷ [Wigston Review into inappropriate behaviours](#), Ministry of Defence, 15 July 2019, recommendation 3.8, 3.9 and 3.10

contain subject matter experts relevant to the type of complaint being decided, and empowering Commanding Officers to resolve minor awards.”²⁸

Gray also said other changes include professionally training investigators to industry standards (rather than using a freelance fee-earning model) which should speed up time to resolve complaints; and ensuring personnel have early access to an Assisting Officer to support and advise them *before* making a complaint.

Wigston suggested Defence consider amending primary legislation to allow civil services to raise a grievance through the Service complaints system (recommendation 3.9). Gray said the MOD did not pursue this option as “policy revisions to complaints processes (within JSP 831, JSP 763 and the civilian grievance policy) are underway with an emphasis on how to make the systems work better together, so the affiliation of the parties involved does not affect redress”.²⁹

The JSPs Wigston and Gray mention are:

- [JSP 831 Redress of individual grievances](#) – this provides guidance on the procedures in relation to service complaints.
- [JSP 763 bullying and harassment complaints procedure](#) – this provides guidance on making, responding to, advising on, investigating and deciding on, complaints of bullying and harassment.

2.3 Legislative changes: The Armed Forces Bill 2019-21

The Armed Forces Bill 2019-21 amends the *Armed Forces Act 2006* to reduce the time in which an appeal can be brought from six weeks to two weeks. Similarly, it shortens the timeframe to appeal to the Ombudsman from six weeks to two weeks. The explanatory notes say it is expected that the regulations will continue to set out exemptions, such as that a person may bring an appeal outside this time limit where the Defence Council (or Service Complaints Ombudsman) considers that it is just and reasonable to allow it. The explanatory notes give as an example of just and reasonable being where the requirements of the service person’s service has reasonably prevented them from meeting the two-week deadline.

The explanatory notes say this clause is “part of wider reforms to increase efficiency and speed up the process within the statutory service complaints system”.³⁰

The [Armed Forces Bill](#) (Bill 244) was introduced in the House of Commons on 26 January 2021. The Bill had Second Reading on 8 February 2021. The Bill’s progress through Parliament can be found on Parliament’s website: [Armed Forces Bill 2019-21](#).

²⁸ [Unacceptable Behaviours Progress review](#), 8 December 2020

²⁹ [Unacceptable Behaviours Progress review](#), 8 December 2020

³⁰ “[Armed Forces Bill 2019-21](#)”, House of Commons Library, 3 February 2021

3. Service Police Complaints Commissioner

The Armed Forces Bill 2019-21 creates a new role of Service Police Complaints Commissioner and enables the creation of a regime for complaints, conduct matters and death or serious injury matters. This regime is modelled on the regime for the civilian police in England and Wales. This reflects a recommendation made by the review of the Service Justice System carried out by HH Shaun Lyons.³¹

Liberty also criticised the complaints process for the Service police. Liberty said:

If a service person wishes to complain about the conduct of a Service Police officer, the process is, inexplicably, twice as long.³²

At Second Reading of the Bill, Johnny Mercer, the Minister for Defence People and Veterans, said the MOD is, in essence, replicating the system overseen by the Independent Office for Police Conduct (IOPC) and explained the Commissioner's new role:

They will have the power to investigate serious and sensitive matters involving the service police, including those relating to conduct, serious injury and death. They will also set the standards by which the service police should handle complaints. As in the case of civilian police, provision will be made to handle both whistleblowing and super-complaints.³³

John Healey, the shadow Secretary of State for Defence, welcomed the new Commissioner role. He said Labour will seek in the Select Committee to ensure the Government "get important details right" on matters such as time limits for bringing complaints, protections for whistleblowers, scope to consider super-complaints and respective remits for the commissioner alongside the Service Complaints Ombudsman.³⁴ Other MPs similarly welcomed the proposal.

Further reading

Library papers [The review of the Service Justice System](#) (CBP9118) and [the Service Police review](#) (CBP8953, June 2020) discuss Lyons' recommendations.

Library paper [Police complaints and discipline](#) explains the police complaints system. This includes criticisms of and reforms to the system, including the transformation of the previous Independent Police Complaints Commission into the new Independent Office for Police Conduct.

³¹ Service Justice System review: Part 2, Ministry of Defence, 27 February 2020, section D, recommendation 44

³² "[Military justice: second-rate justice](#)", Liberty, January 2019

³³ [HC Deb 8 February 2021 c52](#)

³⁴ [HC Deb 8 February 2021 c58](#)

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