



Independent
Complaints
and Grievance
Scheme

Independent Complaints and Grievance Scheme

Annual Report | 2024-25

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1. About this report

Our annual report covers our progress and performance for the period 1 April 2024 to 31 March 2025. This marks a change in our annual reporting cycle, which previously ran from July to June in line with the establishment of the Independent Complaints and Grievance Scheme in July 2018. However, this did not align with the reporting cycles of both the House of Commons and the House of Lords, which operate from April to March.

As this is the first annual report under the new cycle, we have restated figures for 2023-24 to align with the new reporting period and provide comparative information. Additionally, data and information regarding ICGS cases led by the Lords Commissioners for Standards have been included from 1 April 2023.

2. About the Independent Complaints and Grievance Scheme

2.1. Our purpose and role

Parliament's Independent Complaints and Grievance Scheme (ICGS) was set up in 2018. It is an independent mechanism for handling complaints of bullying, harassment or sexual misconduct in the House of Commons and the House of Lords. We provide advice and support to all members of the parliamentary community, whether an individual chooses to make a formal complaint or not. The ICGS was the first scheme of its type in any legislature globally and is underpinned by the [Behaviour Code](#), which sets out the standards of behaviour expected of everyone in Parliament.

2.2. Our principles

Our principles guide our actions and decisions, providing a consistent framework for our behaviour and choices. These foundational principles are integral to all our work.

- Independence and confidentiality are key to reputation and confidence.
- Our work, including improvement, standards and assurance should be informed by the needs of service users and stakeholders, as well as the organisation and should be trauma informed.
- Quality assurance should be risk-based and designed into the process, using the three lines of defence model with the principle of 'right first time' and timeliness seen as a feature of quality.
- Where we are able, we will be transparent and share information.
- Collaboration with stakeholders and service users is built into our process and service improvement work.

2.3. Structure of the Scheme

The Scheme is comprised of the following constituents:

The **ICGS Helpline** is delivered by Victim Support, which operates independently from UK Parliament and political parties. It offers confidential support, advice, and guidance to anyone in the parliamentary community who has experienced, witnessed or been accused of bullying, harassment, or sexual misconduct. The helpline also supports those seeking advice on how to help others – such as line managers or colleagues. It often serves as the first step in understanding options and accessing the formal complaints process¹.

ICGS Investigators operate independently from UK Parliament and political parties. These specialist investigators, with a diversity of experience, are selected from an approved pool and contracted on a case-by-case basis.

The **ICGS Team** supports independent investigators and ensures that ICGS policies, procedures and processes are applied effectively and fairly to complaints under the Scheme. Additionally, the Team provides wellbeing and practical support to service users throughout the process, offering impartial advice, answering questions about the procedure, and directing users to support services.

The **House of Lords Commissioners for Standards** are responsible for independently and impartially investigating alleged breaches of the House of Lords Code of Conduct for Members and Their Staff. This includes investigating allegations of bullying, harassment, and sexual misconduct, assisted by ICGS independent investigators. Where the Commissioner upholds a complaint, they submit their report and recommended sanction to the Conduct Committee.

Decision making bodies (DMBs) are the organisations within the parliamentary community who have responsibility for deciding whether or not a

¹ Complaints about Members of the House of Lords or their staff can also be made directly to the Lords Commissioners for Standards.

complaint is upheld following the conclusion of an investigation. They determine the appropriate action if a complaint is upheld. If the respondent is an MP, the DMB is the Parliamentary Commissioner for Standards. Under Standing Order No. 150, one of the Commissioner’s duties is “to oversee investigations and make findings in cases against Members under the ICGS; to refer such cases to the Independent Expert Panel where a sanction beyond [his] powers is contemplated”.

2.4. Our priorities

The image consists of three vertical rectangular boxes of different colors, each containing text. The first box is purple and contains the text 'To support those who may want to complain, and all users of the Scheme'. The second box is green and contains the text 'To deliver independent, high quality and timely assessments and investigations into bullying, harassment, and sexual misconduct allegations'. The third box is orange and contains the text 'To work with others to continually improve working culture, promote transparency, and support adherence to the Behaviour Code'.

| | | |
|---|--|--|
| To support those who may want to complain, and all users of the Scheme | To deliver independent, high quality and timely assessments and investigations into bullying, harassment, and sexual misconduct allegations | To work with others to continually improve working culture, promote transparency, and support adherence to the Behaviour Code |
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The ICGS’s priorities link to the House of Commons Administration strategic priority ‘To support our people to thrive’, and support the House of Lords Administration’s strategic objective ‘To make Parliament safer, more secure, and sustainable’ and its priority ‘To develop a positive, diverse, and inclusive culture within Parliament’.

3. A message from the ICGS Director

This marks my final annual report as Director of the ICGS. Leading the ICGS since March 2023 has been an immense honour, and I am incredibly proud of our achievements during this time. Reflecting on my time at the ICGS, it is clear that the ICGS is genuinely focussed on its service users, and it is this focus that drives our commitment to continuous improvement, collaborative working, and openness to change. The Scheme is still relatively new, although now established. We have made significant progress, but there is still much more to be done. Together with our colleagues in Parliament, we must accelerate our efforts to realise the advantages of these changes.

At the start of my term, I listened closely to those who had engaged with the Scheme. Their insights shaped our direction and continue to guide our improvements. I want to reassure the parliamentary community that the ICGS is still listening and, more importantly, acting to make the Scheme better for everyone who uses it.

This year, we have enhanced support services for Scheme users by refining our processes to align with trauma-informed principles. Our focus is now on creating a safe environment, actively listening to individuals, and recognising the impact of trauma on their experiences and decisions, while ensuring the Scheme remains accessible to everyone.

We saw a rise in complaint numbers this year. Alongside the implications this had on our complaints handling capacity, we also dedicated significant resources to supporting those affected.

We have implemented measures that will increase the rigour of our processes by incorporating new case management and review processes that follow best practices. While these improvement initiatives may initially cause disruptions and challenges, they are essential for achieving long-term positive outcomes.

We anticipated an adjustment period that might temporarily impact performance and delay immediate results. However, through continuous monitoring and further process optimisation, we aim to achieve greater efficiency while maintaining high-quality investigations.

Despite implementing new measures which improved the quality and timeliness of our investigations, several reports were rejected by the Parliamentary Commissioner for Standards this year. We acknowledge that such decisions can adversely affect all parties involved. We are working closely with the Commissioner and the ICGS Assurance Board to understand the reasons for these rejections and jointly address the underlying issues. This is a learning process, and it is crucial that everyone involved in ICGS investigations, and the wider Scheme, shares a clear and consistent understanding of the expectations. Additionally, when disagreements occur, we must have clear escalation protocols in place to resolve them.

All of the accomplishments set out in this report are especially remarkable considering they were achieved against the backdrop of two significant events. First, the third independent review conducted by Paul Kernaghan CBE QPM in May 2024 and the significant demands placed on the ICGS Team and stakeholders to implement his recommendations in a complex and political environment. The review was positive and made helpful recommendations that will help drive process changes aimed at improving timeliness of investigations. This was followed swiftly by the general election. Like all in Parliament, we paused some work to support the election process and onboarding of new Members and their staff. I must thank all the staff in the Members' Services team, training and culture teams in both Houses for the phenomenal efforts to support the Behaviour Code seminars and sharing the important messages regarding the behaviours expected.

I would like to take this opportunity to thank our stakeholders, staff associations and the Clerk Assistants for their thoughtful guidance, support, and leadership. I have greatly valued and enjoyed engaging with them over this period.

I am enormously grateful for the independent investigators, who have been adaptable, and willing to engage in different ways of working.

Lastly, I would like to express my deepest gratitude to my team. Their exceptional professionalism and unwavering commitment to the ICGS have been truly outstanding, and I am incredibly proud of all they have accomplished. Special mention goes to my deputy Neil Grogan, who will ably act up until the new Director is in post. His knowledge and commitment to the ICGS has been simply outstanding.

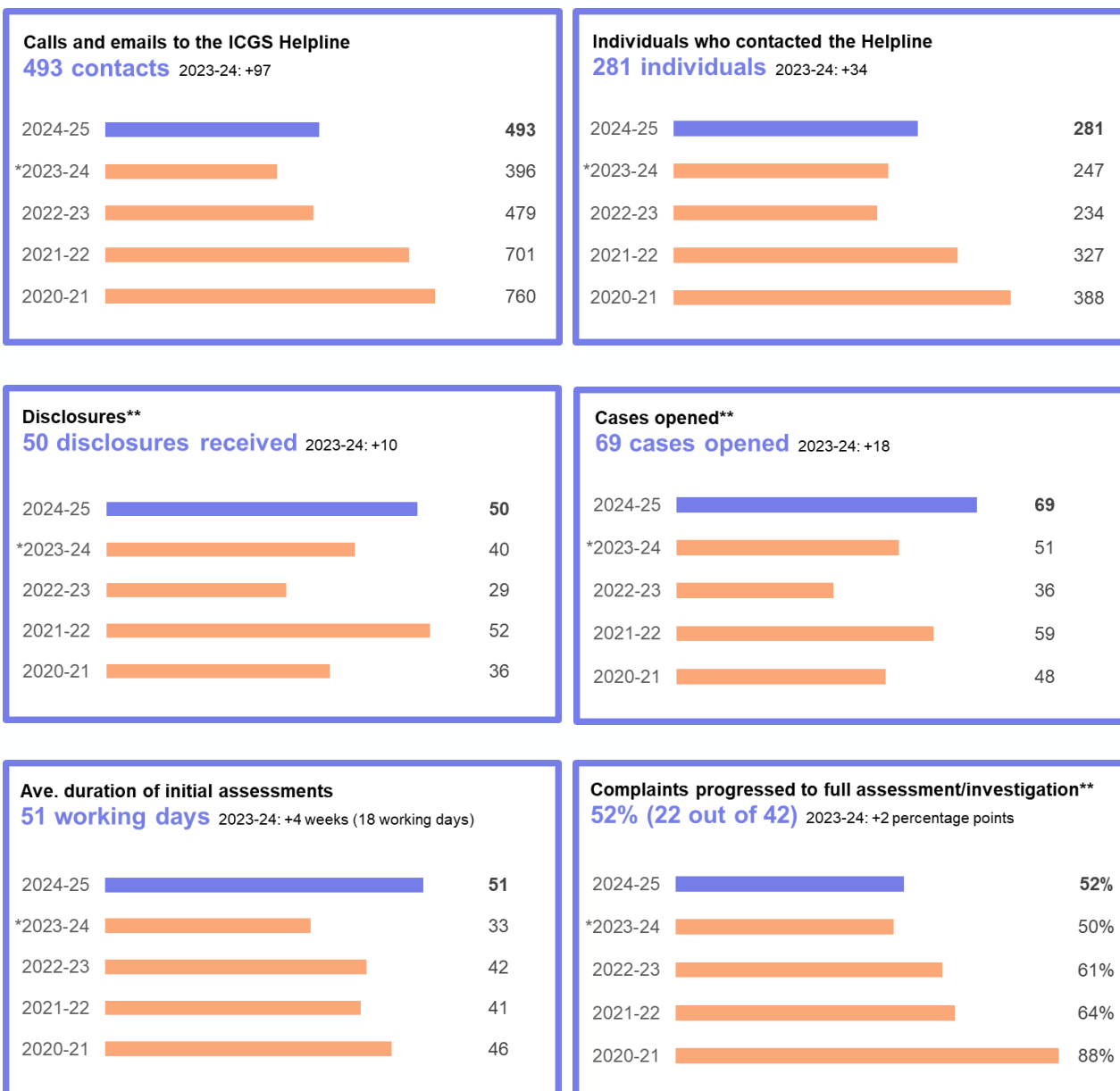
I am confident that with the ongoing support of our stakeholders, and the commitment of the Assurance Board, the ICGS will go from strength to strength. If fully implemented, the recommendations from the Kernaghan Review, will enable some structural changes to enable faster investigations, without compromising quality or independence.

As we move forward, we must be mindful and remember why the ICGS was set up, and the principles that are so important to its continued success. Of course, we must evolve and adapt to what is needed now, but we must ensure that any changes do not unwittingly undermine the core reasons it was set up in the way it was, and in particular, those elements which are most valued by our service users and the parliamentary community. The ICGS needs to service the whole parliamentary community in an equitable way, no matter who complains, and who is complained about.

The ICGS is there for everyone, please use it.

Thea Walton, ICGS Director

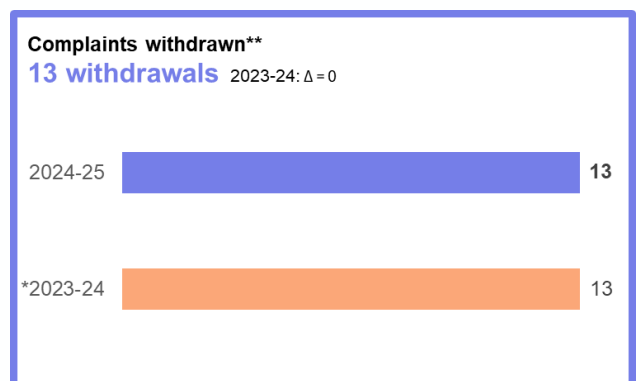
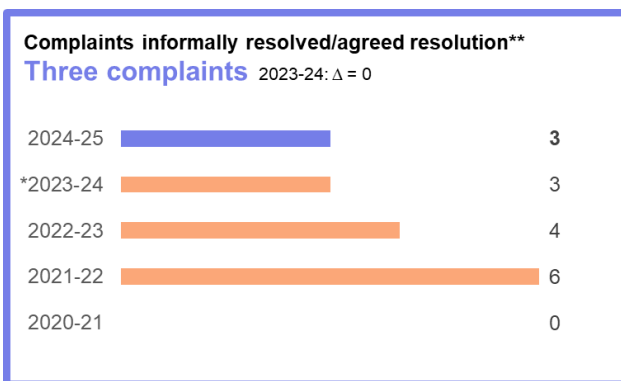
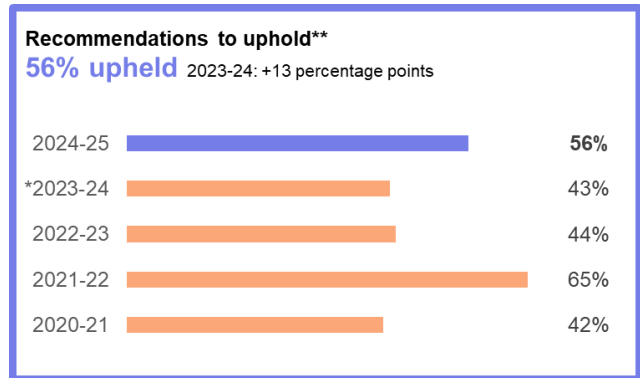
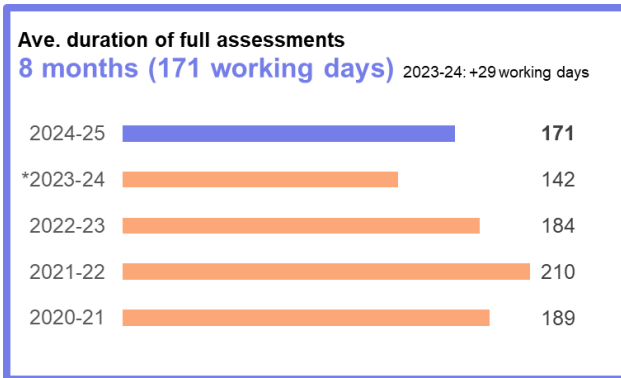
4. Key metrics



*Figures restated for 2023-24 to align with the new annual reporting period of April to March and provide comparative data for this report.

**Metric includes ICGS cases led by the Lords Commissioners for Standards from 1 April 2023.

See Annex B – Data tables for further breakdowns.



*Figures restated for 2023-24 to align with the new annual reporting period of April to March and provide comparative data for this report.

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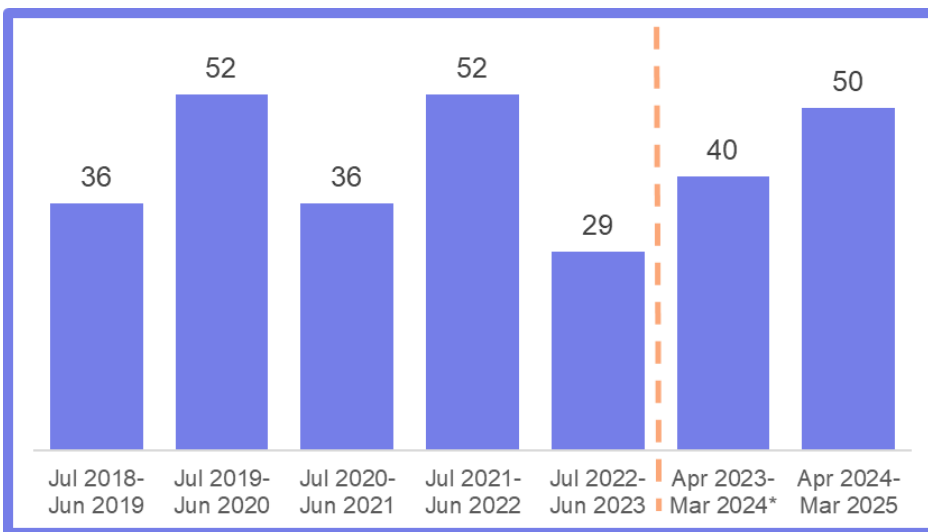
See Annex B – Data tables for further breakdowns.

5. Who complains, about who and about what behaviours

5.1. Disclosures received and cases opened

In the year 2024-25, the ICGS Team and the Lords Commissioners for Standards received a total of 50 disclosures marking a 25% increase (ten more disclosures) compared to the restated total for 2023-24, as illustrated in Figure 1.

Figure 1: Disclosures received 2018 – 2025



*Annual figures restated from April 2023

A single disclosure can involve complaints against multiple respondents and complaints against each respondent may be considered separately upon receipt. In 2024-25, a total of 69 complaint cases were opened from the 50 disclosures received, which is a third more than the 51 cases opened in the restated year 2023-24. Of the 69 cases opened:

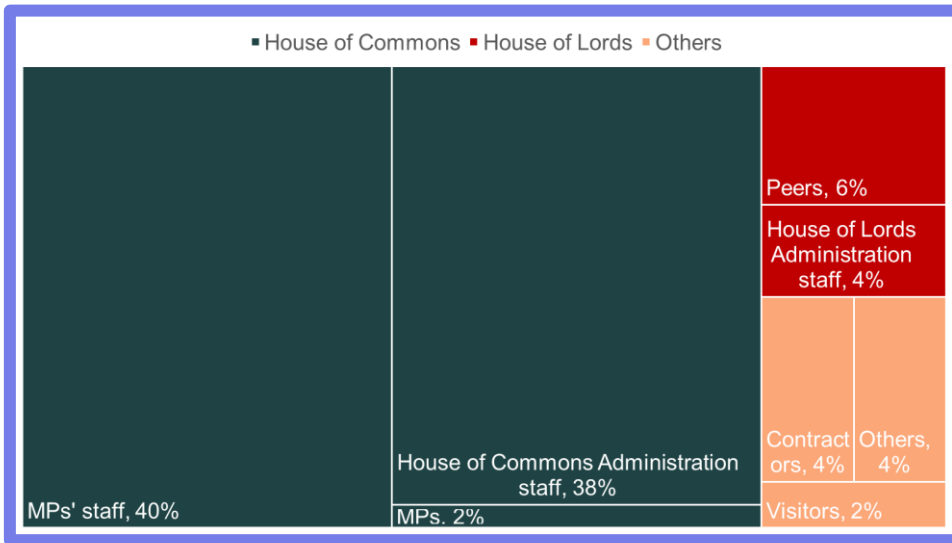
- 66 were complaints made under the [Bullying and Harassment Policy](#)
- three were complaints made under the [Sexual Misconduct Policy](#).

5.2. Who complains and about who

The ICGS covers individuals employed by or working for the House of Commons, the House of Lords and bicameral teams, MPs and their staff, holders of parliamentary security passes (including those employed by external organisations), as well as Peers and their staff.

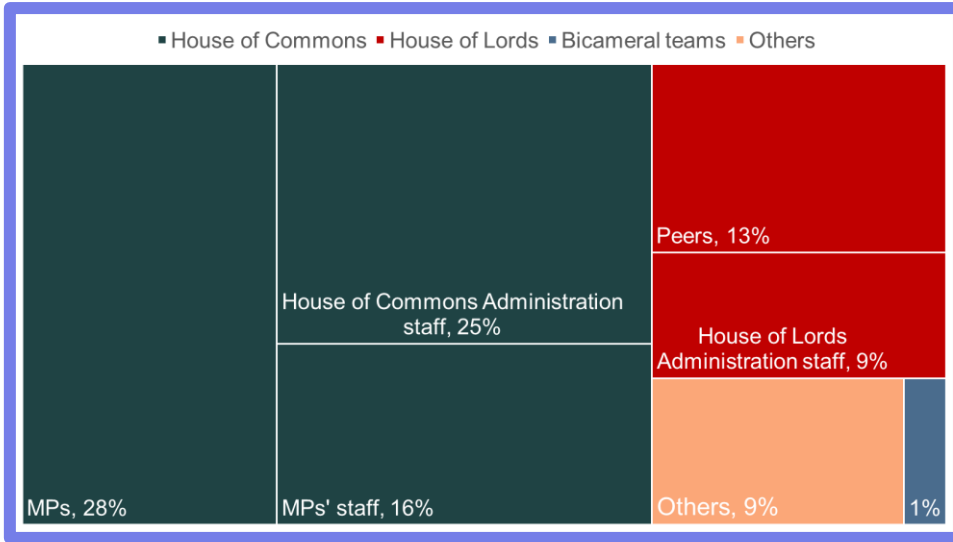
As illustrated in Figure 2, most disclosures in 2024-25 came from MPs’ staff, who made 14 more disclosures than in 2023-24. Nearly all of these were related to bullying and harassment. The next largest group was House of Commons administration staff, who submitted more than triple the six disclosures made the previous year, with almost all also falling under the Bullying and Harassment Policy.

Figure 2: Disclosures received by complainant group in 2024-25



As shown in Figure 3, complaints concerning MPs made up over a quarter of all those received in 2024-25, with levels similar to the previous year. House of Commons administration staff were also a frequently complained about group, with a noticeable increase - more than four times as many as the year before. Complaints about MPs’ staff also rose significantly over the same period.

Figure 3: Complaints by respondent group in 2024-25



6. Performance analysis

In this section we outline our key achievements and performance for the period 1 April 2024 to 31 March 2025. By examining key metrics and trends, we aim to present a transparent and insightful overview of our progress against our priorities.

6.1. Supporting those who may want to complain, and all users of the Scheme

Many people we engage with have faced traumatic or stressful situations. Making a complaint can be an unfamiliar and unsettling experience. It can also be a very difficult time for those who are the subject of complaints. At the ICGS, we are committed to providing comprehensive guidance and support to all our service users. We understand that both the outcome and the way we carry out our work profoundly impact their experience and their trust in the Scheme.

The ICGS Helpline

In July 2024, we renewed our contract with Victim Support – the UK’s leading charity in supporting victims of crime and traumatic events – to continue delivering the ICGS Helpline. The renewed contract commenced in October 2024, marking the continuation of our partnership and the ongoing delivery of this essential service. The Helpline is a core component of the ICGS, offering confidential advice, support, and guidance to all its users. Although not every call results in a formal complaint, the Helpline’s services are vital for assisting all users of the ICGS.

During 2024-25, the Helpline saw an almost 25% increase in demand compared to 2023-24, receiving 493 calls and emails from 281 individuals. Of 155 contacts that fell within the ICGS’s remit², most were from people wishing

² The Helpline receives calls that are not within the remit of the ICGS. For example, calls from members of the public wishing to complain about non-ICGS issues or about police related matters. 45% of total contacts this year were out of remit. This is consistent with previous years.

to discuss personal experiences (74%) and those who were seeking advice or information (22%).

The Helpline also offers an Independent Sexual Misconduct Advisor (ISMA) to all callers reporting sexual misconduct. ISMAs are specially trained to provide support throughout ICGS investigations. If a complaint is made to the police, the ISMA also assists through the criminal justice process, including court visits and trial procedures. In 2024-25, four service users received dedicated ISMA support.

In October 2024, we transitioned the Helpline's case management system from the external provider, Victim Support, to an internal setup now managed by the ICGS. This change gives us greater control over data and processes, ensuring they align closely with organisational standards. It also enhances our oversight of call handling quality, helps identify areas needing improvement, and enables us to track patterns in calls and emails.

To maintain and improve service quality, we hold regular meetings with Victim Support to review their first-line quality assurance processes. We also provide structured feedback based on dip sampling of cases and have introduced a new escalation process to support the handling of complex or sensitive cases. In addition, we deliver ongoing training to helpline staff to ensure consistent and effective service delivery.

Enhancing the wellbeing support we provide

Our Engagement Manager plays a key role in supporting both complainants and respondents. This support includes offering information about the complaints process, listening to the needs and wishes of service users, and directing them to available health and wellbeing resources. Contact can be made via email, video call, telephone, or in person.

During 2024-25, our Engagement Manager had contact with 101 complainants and respondents on more than 750 occasions. Approximately half of these

interactions involved sharing information about the process and providing updates on the progress of investigations. Engagement with wellbeing support was relatively low, with only one in ten calls relating to wellbeing advice. However, we respect individuals' choices if they decide not to engage at the time and understand that we cannot change their stance.

The 2024 Independent Review of the ICGS recommended³ that the ICGS Team collaborate with decision-making bodies to coordinate and agree on providing comprehensive health and wellbeing support for its service users. In response, we carried out an extensive review of the service experience for both complainants and respondents. Our review revealed gaps in the support provided and highlighted the need for a framework that ensures continuous engagement and wellbeing support, keeping service users informed and supported at every stage of the ICGS process, beyond just the investigation. We are now working closely with decision-making bodies to ensure a seamless support experience that is tailored to the diverse needs of service users and minimises the impact on their health and wellbeing.

In 2025, we launched our [Service User Standards](#), marking a positive step in our ongoing commitment to supporting people fairly, respectfully, and with empathy. These standards set out what service users can expect from us, as well as what we expect from them. They will also be used to monitor our performance, promote best practices, and ensure we are consistently providing high-quality, person-centred service throughout the complaints process.

6.2. Delivering independent, high quality and timely assessments and investigations

Effective independent scrutiny is crucial for maintaining trust and confidence in the ICGS. To achieve this, we must ensure our assessments and investigations are thorough and efficient. This year, we have focused on implementing and embedding our quality assurance processes, including more structured case

³ [ICGS Independent Review 2024](#)

management and review process, to reduce investigation times while balancing efficiency and quality. As with any changes to existing processes or the introduction of new ways of working, we anticipated a bedding-in period, which may temporarily affect the duration of cases.

Initial and preliminary assessments

When a formal complaint about bullying, harassment or sexual misconduct is made to the ICGS Team or the Lords Commissioners for Standards, the initial and preliminary⁴ assessments are the first step in determining its eligibility under the Scheme.

In 2024-25, independent investigators and the Lords Commissioners for Standards completed 42 initial and preliminary assessments, with 52% (22) progressing to a full assessment investigation. This is comparable to the proportion of complaints that progressed to a full assessment investigation in 2023-24 (50%, 17 out of 34).

Out of the 42 assessments completed in 2024-25, nine were preliminary assessments conducted by the Lords Commissioners for Standards. The remaining 33 were initial assessments (IA) completed by external independent investigators. These IAs are detailed and time-intensive and took an average of ten weeks (51 working days) to complete - four weeks longer than the average time taken for the 27 IAs completed in 2023-24.

The independent investigator IA establishes whether a complaint meets the eligibility criteria for investigation under the Scheme and whether, if proven, the alleged behaviour reaches the threshold for constituting bullying, harassment, and sexual misconduct as defined by ICGS policies. Sometimes, establishing these facts can be overly complex. The process involves an initial interview with

⁴ For disclosures made to the Lords Commissioners for Standards about Members of the House of Lords or their staff, the Commissioner will conduct a preliminary assessment of the complaint, to determine whether the complaint falls within their remit and whether there is *prima facie* evidence of a breach of the Code. If it passes this assessment, the Commissioner will launch an investigation. The Lords Code of Conduct uses the same definitions of bullying, harassment and sexual misconduct as the ICGS.

the complainant, drafting and analysis of allegations, obtaining feedback from the complainant, and submitting the report, which can take weeks. Even when a complaint clearly meets the criteria for investigation, it must still go through the entire process. In 2024-25, the IA of complaints that did not progress to investigation took nearly as long as those that did; 50 working days compared to 52 working days, respectively. There was also a rise in complaints related to disciplinary, grievance or other proceedings which affected the duration of IAs. Alison Stanley's 18-month review of the ICGS⁵ recommended that, in these cases, the independent investigator should request supporting evidence. This may include contacting the decision-making body and/or the respondent to obtain relevant information to allow for an assessment as part of the IA. The collection and evaluation of this information can result in slower progress in completing IAs.

The comprehensive examination of the IA process in the 2024 Independent Review was welcomed. As paragraph 97 of the review noted "the IA is now less of an eligibility check and has become an overly complicated process". Waiting ten weeks for a decision on whether a complaint will be investigated is an unacceptable length of time. The Review recommended³ clarifying the purpose of the IA to ensure it is solely an eligibility-focussed assessment and, if a case is borderline, move to full assessment to establish an eligibility condition. We are actively working on these recommendations and expect the changes, once implemented, to improve the duration of IAs. However, the ability to deliver this recommendation depends on the approval of changes to the Policy Framework and the establishment of the ICGS Assurance Board, as recommended by the Review. These changes to the Policy Framework and the establishment of the ICGS Assurance Board are awaiting approval from the relevant governance bodies.

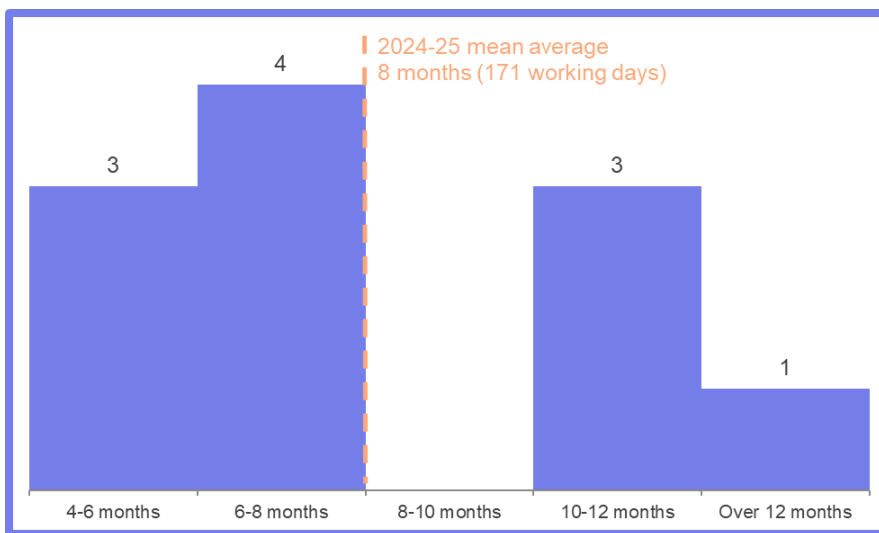
⁵ [Alison Stanley's 18-month review of the ICGS](#)

Full assessments completed by independent investigators

In 2024-25, 11 full assessments (FA) were completed taking on average, eight months (171 working days) to complete. This is one month longer than the six FAs completed in 2023-24 (restated year), which averaged seven months (142 working days).

The shortest FA in 2024-25 took five months (107 working days) to complete, while the longest took 13 months (281 working days). As shown in Figure 4, seven out of the 11 FAs were completed in eight months or less.

Figure 4: Duration of full assessments completed in 2024-25



In 2024-25, six out of the 11 completed FAs included course of behaviour allegations, more than double the number from 2023-24. These complaints are challenging to investigate because they often involve a history of behaviour over time, and this complexity is heightened by the need to corroborate multiple incidents. Additionally, half of the complaints investigated in 2024-25 contained multiple sub-allegations, which are more specific claims within the broader allegations. The quality assurance process for draft investigation reports in these cases was significantly prolonged due to the need for thorough checks on each allegation. Consequently, the average duration of the quality assurance process increased from five weeks in 2023-24 to eight weeks in 2024-25, thereby extending the overall duration of FAs.

Delays in cases

The length of an investigation can be influenced by its size and scope. Larger investigations with multiple allegations or numerous involved parties tend to take longer to complete. Moreover, complex cases necessitate detailed investigations, which inherently take more time. While we have made progress in reducing delays by increasing investigative resources allocated to cases and improving evidence management, there are external factors beyond our control that can influence the duration of an investigation. Delays are rarely due to a single cause; however, in 2024-25 the primary causes were as follows:

- **Breaches of confidentiality** - Maintaining confidentiality during complaint investigations is a constant challenge. In 2024-25, there were instances where confidentiality was either alleged to have been breached or was indeed breached. One case was delayed by nearly two months due to the investigation of the breach itself. These breaches not only caused delays in the investigation process but also risked undermining the integrity of the evidence and adversely affected the wellbeing of the involved parties. Beyond this, breaches can erode trust in the Scheme and the broader workplace culture of Parliament.
- **Unavailable and unresponsive parties** - Unavailable and unresponsive parties, whether complainants, respondents, or key witnesses, can significantly impact the length of an investigation. In 2024-25, there were instances where investigators had to send multiple reminders or follow-ups to request information or schedule meetings. Delays in communication from any party can hinder the timely collection of crucial testimonies and evidence. To help address this, our new service user standards set out clear expectations for everyone involved in the complaints process. These standards clarify the roles and responsibilities of all parties, including the importance of timely engagement and adherence to agreed timescales. They also highlight how individual actions can impact the

progress of an investigation. In cases where the complainant is unresponsive and all reasonable steps to contact them have been exhausted, the investigation may be paused and the complaint withdrawn, unless there are exceptional reasons not to do so.

Investigator recommendations following investigation

Independent investigators recommended upholding the complaint in a third of the 11 full assessments completed in 2024-25. This is similar to the 33% (two out of six) complaints upheld in 2023-24.

Investigations into complaints against MPs

In 2024-25, six of the 11 investigations completed involved complaints against MPs. These investigations took an average of nine months (187 working days) to complete, including the initial assessment time. This duration is consistent with the nine months (183 working days) taken to complete three investigations into MPs in 2023-24 but is seven weeks (35 working days) longer than investigations into other respondents.

Upon concluding an investigation into a complaint against an MP, the investigator's report and recommendation on whether the complaint should be upheld are sent to the Parliamentary Commissioner for Standards (the Commissioner). The Commissioner is the decision-maker⁶ in cases where an MP is the respondent. If the Commissioner considers that there are significant errors or omissions in the report or is of the view that the findings are unreasonable or perverse, the report may be rejected and the investigator may be asked to gather more evidence or provide clarification. In 2024-25, the Commissioner rejected four out of the six investigation reports submitted to him. In another case, after a full investigation, the independent investigator recommended that the complaint should not be upheld due to ineligibility. The

⁶ Under Standing Order No. 150, one of the Commissioner's duties is "to oversee investigations and make findings in cases against Members under the Independent Complaints and Grievance Scheme; to refer such cases to the Independent Panel of Experts where sanction is beyond [his] powers is contemplated."

Commissioner returned the report, determining that there was no decision for him to make. The complainant appealed to the IEP, which returned the case to the Commissioner to make a decision on the complaint⁷. Upon reconsideration, the Commissioner ultimately decided not to uphold the complaint as it was ineligible.

We recognise that rejecting an investigation report can adversely affect the overall experience of the Scheme for both the complainant and respondent. Furthermore, it has the potential to damage the Scheme's reputation and erode confidence in it. While we cannot comment publicly on individual cases, we take this seriously and both the ICGS and the Commissioner are committed to developing a shared understanding of the standards for investigations to reduce rejections in the future.

Re-investigations

When the Commissioner rejects an investigation report, additional work may be necessary, or it may lead to a partial or full re-investigation of the complaint. The decision to re-investigate is made by the ICGS Team. In 2024-25, two re-investigations were completed, taking an average of ten months (213 working days) to complete. Upon completing the re-investigations of these complaints, independent investigators recommended that one complaint should be upheld.

Lords Commissioners for Standards investigations

In 2024-25, the Lords Commissioners for Standards investigated and concluded seven complaints made under the ICGS about Members of the House of Lords and their staff. Six of these complaints were upheld, while one was dismissed. On average, Lords Commissioners for Standards investigations took five months (103 working days) to complete.

⁷ [IEP annual report 2024, page 11 Decisions on the eligibility of complaints.](#)

Informally resolved complaints

People do not always want a full investigation and formal outcome for their complaints. Sometimes, they simply want the person to understand the impact of their actions and for the behaviour to be acknowledged and addressed. In such cases, when both the complainant and respondent agree, the complaint can be resolved through informal or agreed resolution⁸. This approach focuses on rebuilding working relationships and improving the working environment.

In 2024-25, three complaints were successfully resolved through informal and agreed resolution processes, matching the number resolved in 2023-24.

Complaints withdrawn

A complainant may choose to withdraw their complaint at any point before the report is sent to them and the respondent for the factual accuracy check. In 2024-25, a total of 13 complaints were withdrawn, which is the same number as in 2023-24. Of these, nine were withdrawn before the initial assessment was completed, and four were withdrawn during the investigation stage. The reasons for withdrawal varied, including the absence of a specific complaint about an individual's behaviour, the complainant opting to pursue another route for their complaint, and the complainant feeling unable to continue despite the support services available to them.

Our work in 2024-25

Each investigation will have its own unique facts and circumstances. However, when a complaint of bullying, harassment or sexual misconduct is made, members of the parliamentary community should be assured that it will be investigated thoroughly, fairly, and promptly. In response to concerns that ICGS investigations take too long, we have reviewed our processes and put additional assurance measures in place that will support the independent investigators to deliver robust investigations.

⁸ House of Lords Enforcement Procedure (bullying, harassment and sexual misconduct) paragraph 31: "At any time during an investigation, the Commissioner may seek to reach an agreed resolution between the complainant and the member under investigation. This is at the Commissioner's discretion and may only be reached with the agreement of both the complainant and member."

Throughout the year we have refined our case management process to deliver a more streamlined and structured approach to handling investigations from start to finish. These enhancements ensure that investigations are thorough, resources are used efficiently, and cases are managed consistently. In November 2024, we introduced a new case review process as part of these improvements. The purpose of these case reviews is to identify and address quality issues as they arise and to highlight cases that may require additional or ongoing scrutiny. As with any new process, there is an adjustment period that may temporarily impact performance due to factors such as adaptation time.

As part of these enhancements, we also introduced a new investigation report template designed to improve clarity, consistency, and quality across our cases. This template supports a more structured approach and ensures that key information is clearly and systematically presented. We are committed to continuously improving this template, drawing on feedback for investigators and DMBs, as well as learning from its use in practice.

We have completed the recruitment of Investigative Support Officer roles, following recommendations of the Review. These roles will bring expertise in interviewing to support and assure the quality of investigators' work, while also undertaking tasks to improve efficiency.

All ICGS case managers are now required to complete the Advanced Professional Certificate in Investigative Practice (APCIP), which is widely recognised as the leading qualification for professionals in investigative roles. This certification will enable our case managers to provide the best support possible to independent investigators during their investigations.

Additionally, in 2024-25, we held two Keeping in Touch Days with independent investigators. These days are designed to offer a platform for investigators to discuss procedural changes and queries, share best practices, and exchange insights from their investigations.

6.3. Working with others to continually improve working culture, promote transparency, and support adherence to the Behaviour Code

The ICGS is in a unique position to be a leading voice in improving Parliament's working culture. By collaborating with various stakeholders, we influence change and ensure that leaders understand what is needed to make Parliament a safe place of work for everyone.

'Behaviour Code: Why it matters' seminars

The ICGS is underpinned by Parliament's [Behaviour Code](#), which applies to all members of the parliamentary community. 'Behaviour Code: Why it matters' seminars are designed to help individuals understand the Code, their role in fostering a respectful working environment, and how to seek support if they experience or witness inappropriate behaviour.

In 2024-25, we continued our collaboration with Parliament's Culture and Learning teams to further embed the Behaviour Code across Parliament. Between 1 April 2024 and 31 March 2025, a total of 1,951 members of the parliamentary community attended 'Behaviour Code: Why it matters' seminars. This included 349 of the 350 newly elected MPs following the General Election in July 2024. By 30 April 2025, 639 out of 650 new and returning MPs had attended either a Behaviour Code seminar or its predecessor, Valuing Everyone training, with five MPs waitlisted.

In response to recommendation 24³ from the Independent Review of the ICGS, a list of MPs who have and have not attended a seminar is now publicly available on the [UK Parliament website](#). Separately, the Code of Conduct for Members of the House of Lords mandates that all new Members must attend a seminar⁹. This year, for the first time, we also delivered a session specifically for

⁹ In accordance with the decision of the House of Lords Conduct Committee to publish this information, a list of Members of the House of Lords who have completed the Behaviour Code seminar, or the previous Valuing Everyone course, is [published on the UK Parliament website](#).

Members' staff in the House of Lords, with further initiatives planned to continue engaging this group.

To further integrate the Behaviour Code within the broader parliamentary community, several measures are being implemented. In response to recommendation 21³ of the ICGS Review, a new 'Behaviour Code: Why it matters' seminar is being developed for key contractor personnel. This seminar will be augmented with materials designed for participants to share with their teams.

The feedback from attendees of the 'Behaviour Code: Why it matters' seminars offers valuable insights into the seminars' effectiveness and impact. In 2024-25, three-quarters of attendees shared their thoughts, and of those:

- 99% said the seminar increased their awareness of key elements of the Behaviour Code
- 99% said the seminar encouraged them to reflect on the role they play in building a respectful culture
- 99% said the seminar effectively signposted support services and sources of help
- 95% said the seminar increased their confidence in calling out unacceptable behaviour.

[Working with others to improve Parliament's working culture](#)

To foster lasting and consistent cultural change in Parliament, the ICGS collaborates with various stakeholders to ensure Parliament is a workplace where everyone feels safe and valued. By analysing our cases, we gain valuable insights into patterns, trends, and relationships in the complaints we investigate. We share these findings with other teams to inform broader cultural transformation initiatives and support ongoing cultural change within Parliament. A review of 17 ICGS investigations completed over the last two years (Apr 2023 to Mar 2025) revealed the following patterns. While based on a

limited number of cases, these findings help guide targeted initiatives across Parliament designed to further promote a positive working culture.

The presence of alcohol

Between April 2023 and March 2025, alcohol was a factor in almost one out of every five complaints investigated. Some of these complaints arose from external functions associated with parliamentary activities, while others were linked to incidents where colleagues socialised in bars. Alcohol was notably prevalent in the small number of complaints made under the Sexual Misconduct Policy, with respondents accused of inappropriate and unwanted touching. Other cases involving alcohol led to situations that escalated into hostility and aggression. In all instances where alcohol was a factor, the independent investigator recommended upholding the complaint.

Power imbalance¹⁰

Bullying and harassment involve the abuse or misuse of power, which can manifest in various forms, including from a power imbalance. In the workplace, this can occur when an individual or a group uses their position to intimidate, threaten, or demean others, thereby creating a hostile work environment.

Complainants have reported that individuals in line management roles abused their authority by publicly humiliating staff, being openly critical and dismissive. This behaviour caused complainants to feel insecure about their job stability and created an intimidating work environment. Additionally, it was alleged that managers assigned tasks that were excessively challenging or impossible to complete within the given timeframe, making the complainants feel as though they were being set up to fail.

Outside of the traditional power dynamic, there were instances where managers experienced bullying and harassment. Reported behaviours included staff becoming aggressive and intimidating through actions or words meant to

¹⁰ Protected characteristics are not included in this analysis due to limited data collection. Additionally, service users may be reluctant to disclose such personal data, which can limit the completeness and reliability of this information.

frighten, threaten, or create a hostile or fearful work environment. These occurrences often arose from disagreements about operational decisions or breakdowns in communication.

Management action

Initiating management or disciplinary action on legitimate grounds is a standard aspect of line management. However, such actions can sometimes lead to counterclaims from employees. If an employee perceives the management action as unjust, discriminatory, or involving false and damaging statements, it may result in allegations of bullying if the actions are believed unreasonable.

Over the past two years, there has been a noticeable rise in disclosures where management actions were a contributing factor to the context of the complaints. A third of the bullying and harassment complaints investigated between 1 Apr 2023 and 31 Mar 2025 pertained to management actions.

Across the cases, a range of management actions were factors, including disciplinary proceedings involving the complainant and the escalation of performance-related concerns. Additional factors included the application of reasonable adjustments, the management of sickness absence, and modifications to annual leave policies. Notably, some cases involved multiple overlapping HR matters.

Raising awareness of the ICGS

We have an ambitious outreach programme designed to connect with members of the parliamentary community and raise awareness about the ICGS. Through meaningful and respectful conversations, we aim to build trust and confidence in the Scheme. By sharing information about the ICGS and how it works, we ensure transparency, helping people understand their options and potential outcomes. Our goal is for everyone in the parliamentary community to know that the ICGS is available for advice or complaints, and they will receive the support they need.

Since April 2024, we have engaged with nearly 3,700 individuals through a total of 40 departmental and team meetings, network sessions, staff town halls and

fairs, and staff inductions, averaging 92 attendees per event. Additionally, we have contributed articles about the ICGS to department and team newsletters and distributed ICGS literature throughout the parliamentary estate to ensure that colleagues with limited digital access can easily obtain information.

Working with our stakeholders

We are committed to listening to our stakeholders and throughout 2024-25, we regularly engaged with colleagues from the administrations of both Houses, trade unions, and Whips offices. These meetings provide a collaborative environment for sharing updates on progress, discussing changes, and addressing any concerns.

In June 2024, we launched our first ever stakeholder survey to gather feedback and insights. Our objectives were to evaluate the effectiveness of our communication and engagement, understand stakeholder expectations and concerns, and ensure their perspectives are integrated into our decision-making processes. A second survey in March 2025 revealed:

- Stakeholders have a positive overall opinion of the ICGS, appreciating the team's professionalism and continuous improvement efforts.
- Stakeholders agree that the ICGS is supportive of its service users and believe it offers complainants sufficient support and information to make informed choices about pursuing a complaint.
- Stakeholders acknowledge the unique and complex environment in which the ICGS operates and express confidence in its independence.
- There is general agreement among stakeholders that the ICGS focusses sufficiently on improving the quality and efficiency of its processes overall.

7. Independent Review of the ICGS 2024

In May 2024, Paul Kernaghan CBE QPM released the third independent review of the ICGS³, building on the previous reviews by Alison Stanley CBE in 2019 and 2021. Paul Kernaghan's review was thorough, gathering information and evidence from across the parliamentary community through stakeholder meetings, a call for evidence, a feedback community-wide survey, and written documentation on the ICGS and related cultural, HR, and diversity and inclusion initiatives.

In his summary of the report, Paul Kernaghan wrote:

“The ICGS is making a difference.

“The ICGS is necessary and has demonstrated its ability to hold people to account for unacceptable behaviour.

“The parliamentary community should take pride in the work and achievements of the ICGS to date.”

As laid out in the executive summary of the report, the 26 recommendations made by the review covered the following areas:

- Establishing a more agile and responsive governance model to facilitate rapid procedural changes;
- Clearly defining the role of political parties in the complaints process;
- Improving the timeliness and quality of investigations;
- Addressing confidentiality and transparency issues;
- Providing clarity and expediency to the interpretation of scope to ensure timely progress of cases under the Scheme;
- Exploring resolution outside of the Scheme and the use of restorative practice;
- Enhancing wellbeing support available to ICGS service users; and
- Highlighting the importance of training for all members of the parliamentary community.

By 31 March 2025, six of the 26 recommendations had been successfully delivered or integrated into regular operations. Work is currently in progress on 16 recommendations, while the remaining four have yet to be started.

It is important to note that six of the outstanding recommendations are substantively interdependent on Recommendations 1 and 2 – specifically the creation of a Policy Framework and the re-establishment of the ICGS Assurance Group as a permanent ICGS Assurance Board. These two recommendations are considered critical enablers for the effective delivery of the dependent actions. The House of Commons Commission formally reviewed the proposed changes arising from these recommendations during its December 2024 meeting, and discussions regarding the approach to their implementation are ongoing.

Annex A: Financial information

The figures below are the total spend in each of the financial years 2023-24 and 2024-25. They include costs for external services (such as the Helpline, independent investigators, transcription service, and Behaviour Code Training) as well as staffing costs:

- The ICGS had a total budget of £1,916,814 for the financial year 2023-24 (April 2023 to March 2024). The actual spend for the year was £1,831,997.
- The total budget for the ICGS for the financial year 2024-25 (April 2024 to March 2025) was £2,005,330. The actual spend for the year was £1,993,866.

Annex B: Data tables

Table 1: Calls to the ICGS Helpline

| Measure | 2023-24 | 2024-25 |
|---|---------|---------|
| Number of calls and emails to the Helpline | 396 | 493 |
| Number of individuals contacting the Helpline | 247 | 281 |
| Within ICGS remit | 144 | 155 |
| Reason: seeking advice (info only) | 31% | 22% |
| Reason: individual (own experience) | 64% | 74% |
| Reason: manager (supporting other) | 2% | 0% |
| Reason: colleague (supporting other) | 3% | 2% |
| Reason: respondent | 0% | 3% |

Table 2: Disclosures received, cases opened, and initial/preliminary assessments

| Measure | 2023-24 | | | 2024-25 | | |
|---|---------|----|-----------|---------|----|-----------|
| | B&H | SM | Total | B&H | SM | Total |
| Number of disclosures received | 36 | 4 | 40 | 47 | 3 | 50 |
| Number of cases opened | 47 | 4 | 51 | 66 | 3 | 69 |
| Number of initial assessments completed by ICGS Team | 24 | 3 | 27 | 32 | 1 | 33 |
| Average number of working days to complete initial assessments | 33 | 31 | 33 | 52 | 25 | 51 |
| Number of preliminary assessments completed by Lords Commissioners for Standards | 7 | 0 | 7 | 9 | 0 | 9 |
| Number of complaints progressed to investigation following initial/preliminary assessment | 14 | 3 | 17 | 21 | 1 | 22 |
| Number of complaints determined out of scope following initial/preliminary assessment | 17 | 0 | 17 | 20 | 0 | 20 |
| Number of complaints withdrawn at initial assessment stage | 12 | 1 | 13 | 9 | 0 | 9 |

Note: B&H = Bullying and Harassment; SM = Sexual Misconduct

Table 3: Full assessments/investigations

| Measure | 2023-24 | | | 2024-25 | | |
|---|---------|-----|------------|---------|-----|------------|
| | B&H | SM | Total | B&H | SM | Total |
| Number of full assessments/investigations started | 13 | 3 | 16 | 18 | 0 | 18 |
| Number of ICGS Team full assessments completed | 5 | 1 | 6 | 9 | 2 | 11 |
| Average number of working days to complete ICGS Team full assessments | 122 | 241 | 142 | 180 | 129 | 171 |
| Number of ICGS Team complaints upheld (investigator recommendation) | 1 | 1 | 2 | 3 | 1 | 4 |
| Number of ICGS Team re-investigations started | 1 | 1 | 2 | 0 | 0 | 0 |
| Number of ICGS Team re-investigations completed | 1 | 0 | 1 | 1 | 1 | 2 |
| Average number of working days to complete ICGS Team reinvestigations | 153 | - | 153 | 282 | 143 | 213 |
| Number of ICGS Team re-investigated complaints upheld (investigator recommendation) | 0 | - | 0 | 0 | 1 | 1 |
| Number of Lords Commissioners for Standards investigations concluded with findings | 1 | 0 | 1 | 4 | 0 | 4 |
| Average number of working days to conclude Lords Commissioners for Standards investigations | 113 | - | 113 | 103 | - | 103 |
| Number of complaints concluded by Lords Commissioners for Standards investigations | 1 | 0 | 1 | 7 | 0 | 7 |
| Number of complaints upheld by Lords Commissioners for Standards | 1 | - | 1 | 6 | - | 6 |
| Number of complaints informally resolved/concluded by agreed resolution | 3 | 0 | 3 | 3 | 0 | 3 |
| Number of complaints withdrawn at full assessment/investigation stage | 0 | 0 | 0 | 3 | 1 | 4 |

Note: B&H = Bullying and Harassment; SM = Sexual Misconduct