

Agenda – Standards of Conduct Committee

Meeting Venue:

For further information contact:

Video-conference via Zoom

Meriel Singleton

Meeting date: 23 September 2024

Committee Clerk

Meeting time: 09.30

0300 200 6565

SeneddStandards@senedd.wales

- 1 Introductions, apologies and substitutions**

 - 2 Consider a report from the Commissioner for Standards in accordance with Standing Order 22.2(i)**
(9.30 – 9.40)

 - 3 Consider a report from the Commissioner for Standards in accordance with Standing Order 22.2(i)**
(9.40 – 9.50)

 - 4 Consider a report from the Commissioner for Standards in accordance with Standing Order 22.2(i)**
(9.50 – 10.00)

 - 5 Consider a report from the Commissioner for Standards in accordance with Standing Order 22.2(i)**
(10.00 – 10.10)

 - 6 Consider a report from the Commissioner for Standards in accordance with Standing Order 22.2(i)**
(10.10 – 10.20)

 - 7 Annual Report of the Commissioner for Standards**
(10.30 – 10.50)
- (Pages 1 – 20)



- 8 Note from the Commissioner for Standards**
(10.50 – 11.00) (Page 21)
- 9 Paper to note – Senedd Commission – Dignity and Respect:
Building Users Survey Results**
(Pages 22 – 32)
- 10 Paper to note – House of Lords Commissioners for Standards
Annual Report**
(Pages 33 – 53)
- 11 Paper to note – Letter from the Counsel General**
(Page 54)

ANNUAL REPORT

April 2023 – March 2024



UPHOLDING
REPUTATIONS

SAFEGUARDING
STANDARDS

ADDRESSING
CONCERNS

The Senedd Commissioner for Standards is an independent person appointed by the Welsh Parliament, to safeguard standards, to uphold reputations, and to address your concerns.



Douglas Bain CBE TD
Senedd Commissioner for Standards

An electronic copy of this report can be found on the Commissioner for Standards website: www.standardscommissionerwales.org.

Copies of this report can also be obtained in accessible formats including Braille, large print, audio or hard copy from:

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ANNUAL REPORT

April 2023- March 2024



Senedd Cymru
Welsh Parliament

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1. Introduction

1. This is my fourth annual report as Senedd Commissioner for Standards. The report outlines how I performed the functions of that office during the year ended 31 March 2024.

2. After setting out the relevant statutory provisions it gives information on the number and subject matter of complaints received and how they were processed. Information is also given on other work undertaken in 2023-24, the expenditure of the Commissioner's office and what is planned for 2024-25.

2. Functions and duties of the Commissioner

3. There were no changes to the functions and duties of the Commissioner during the reporting year. The office of Senedd Commissioner for Standards was created by section 1(1) of the National Assembly for Wales Commissioner for Standards Measure 2009 ('the Measure').¹ Section 5 of the Measure provides for the independence of the Commissioner from the direction or control of the Senedd.

4. The functions of the Commissioner are set out in sections 6 and 7 of the Measure and may be summarised as being –

- To receive any complaint that a Member has failed to comply with a requirement of the Code of Conduct² (the Code') or other relevant provision and to investigate and report to the Standards of Conduct Committee ("the Committee") on those that are admissible;³
- To advise Members and members of the public on the process for making and investigating complaints;
- To give advice to the Senedd on any matter of general principle relating to the standards of conduct of Members, the procedure for investigating complaints or any other matter relating to promoting, encouraging and safeguarding high standards of conduct in the public office of Member of the Senedd.

5. Section 19 of the Measure requires the Commissioner, as soon as possible after the end of each financial year, to submit a report to the Senedd on how the functions of the Commissioner have been exercised during that year.

¹ <http://www.legislation.gov.uk/mwa/2009/4/contents;>

<http://www.legislation.gov.uk/mwa/2009/4/contents/enacted/welsh>

The title of the post was changed from National Assembly for Wales Commissioner for Standards by the coming into effect of section 7 of the Senedd and Elections (Wales) Act on 6 May 2020.

² <https://www.assembly.wales/en/memhome/code-conduct-mem/Pages/default.aspx>

³ As defined in section 6(3) of the Measure.

3. Complaints

Introduction

6. By far the greater part of my time during the year was spent dealing with complaints against Members of the Senedd. Further information about them is set out in the following paragraphs.

Complaints carried forward from 2022-23

7. At the start of the reporting year there were no complaints that were awaiting a decision on admissibility. The investigations of three admissible complaints were ongoing at the start of the year. My report of one of these was submitted to the Committee in April 2023.⁴ The report of my investigation into the complaint against Rhys ab Owen MS was submitted in May 2023. My investigation of the third ongoing complaint was brought to an end in June 2023 in accordance with paragraph 5.1(b) of the **Procedure for Dealing with Complaints against Members of the Senedd (“the Procedure”)**.⁵

New complaints

8. During the year 190 new complaints, were received. All these complaints were dealt with in accordance with the Procedure.

9. The sources, subject matter and reasons for inadmissibility of these complaints is shown in the following Tables.

⁴ **Seventh Report to the Sixth Senedd under Standing Order 22.9**

⁵ Paragraph 5.1(b) allows the Commissioner to bring consideration of an admissible complaint to an end where it repeats substantially an allegation that has already been considered by the Commissioner and no significant additional evidence has been provided

Table 1: Complaints received, source and admissibility

	2019 -20	2020-21	2021-22	2022-23	2023-24
Received	106	216	44	71	190
% by Public	76.4	94	91	58	89
% by Member against Member	13.2	4.5%	0	0	0.5
% by Member against self	0	0.5%	0	7	1.5
% by Clerk of the Senedd	10.4	1	9	35	9
% not admissible	85.9	41	80	49	84
% admissibility not decided by year end	6.6	9	5	0	1

Table 2: Complaints by subject matter

	2019-20	2020-21	2021-22	2022-23	2023-24
Conduct on social media	58	60	6	8	53
Misuse of resources	15	25	4	5	3
Standard of service	13	7	16	5	17
Failure to register/declare/update an interest	9	95	7	27	24
Outside remit (conduct in plenary or Ministerial conduct)	7	12	3	20	29
Other conduct⁶	4	17	8	6	64
TOTAL	106	216	44	71	190

⁶ These included 26 complaints by a member of the public about the conduct of two Members in relation to a complaint. Others subjects complained about included Welsh Government policies, comments by Members on broadcast media and the reimbursement to Members of subscriptions to institutions.

Table 3: Reasons for inadmissibility⁷

Reason number	Descriptor	2019-20	2020-21	2021-22	2022-23	2023-24
1	Not in writing (Procedure paragraph 4.2(a))	0	0	0	0	0
2	Complainant not named (Procedure paragraph 4.2(b))	3	0	0	0	0
3	Not about conduct of a named Member (Procedure paragraph 4.2(c))	5	2	2	0	9
4	Act or omission complained of not stated (Procedure paragraph 4.2(d))	82	86	33	1	9
5	Insufficient supporting evidence (Procedure paragraph 4.2 (e)(i)) ⁸	-	-	-	3	40
6	Conduct, if proved, not a breach of relevant provision (Procedure paragraph 4.2(e)(ii))					
	a. Conduct in plenary or Committee (Code paragraph 3) ⁹	-	-	-	13	17
	b. Ministerial Conduct (Code paragraph 7(ii)) ¹⁰	-	-	-	7	12
	c. Standard of service (Code paragraph 7(iii)) ¹¹	-	-	-	4	17
	d. Other	-	-	-	7	54
7	Not within period allowed (Procedure paragraph 4.2(g))	2	1	0	0	1

10. Of the 29 admissible complaints, 18 were referrals by the Clerk to the Senedd. All related to minor failures by Members to notify a change to their registered interests within the time

⁷ More detailed statistics on the reasons for non-admissibility were introduced for 2022-23. For previous years most complaints were classified as inadmissible under the descriptor "Insufficient substance to justify further investigation. The figures are shown against Reason 4.

⁸ Where Complainants initially fails to provide sufficient evidence or information to support a potentially admissible complaint, they are allowed at least 14 days to provide it.

⁹ Paragraph 3 of the Code provides that the conduct of Members during plenary sessions the Senedd and in committees is normally dealt with by the Llywydd and the chairs of Committees through the application of Senedd Standing Orders. The Commissioner may investigate a complaint of such conduct only if it is referred for investigation by the Llywydd or the committee chair.

¹⁰ Section 8 of the Measure and paragraph 7(ii) of the Code make clear that the Commissioner has no role in relation to complaints of alleged misconduct by Members when acting exclusively in their Ministerial capacity. The complainants who alleged ministerial misconduct were directed to the office of the First Minister.

¹¹ Paragraph 7(iii) of the Code provides that it does not apply in relation to the standard of service and outcomes received from a Member.

allowed under Standing Orders. In all instances, as the Members accepted their error and had rectified it, I recommended to the Committee that I should not continue my investigation. All such recommendations were accepted.

11. I brought my investigation of three of the admissible complaints to an end, in accordance with paragraph 5.1(b) of the Procedure, because I had already submitted my report about identical conduct to the Committee and no useful purpose would have been served by continuing my investigation. I ended my investigation of another complaint, in accordance with paragraph 5.1(c) of the Procedure, when the Complainant informed me that she did not wish to continue with her complaint.

12. I commenced a full formal investigation of the seven other admissible complaints. My reports on four of these investigations were submitted to the Committee during the year. In all of these reports I gave my opinion that there had been no breach of any relevant provision. The Committee agreed with all of these opinions.^{12 13 14 15}

Complaints carried forward to 2024-25

13. At the year-end I had not decided on the admissibility of two recently received complaints.¹⁶ My investigation of three admissible complaints received during the year was ongoing.¹⁷

Consideration

14. At 190, the number of complaints received is the highest since 2020-21 and an increase of more than 167% on last year. That increase can in part be explained by the fact that between them two Members were the subject of 58 complaints and one member of the public made 26 complaints, none of them against either of these Members. Nonetheless, it is clear that even without these individual contributions there was as very significant increase.

15. I do not believe that this increase in the number of complaints received indicates any reduction in the generally high standard of conduct of Members of the Senedd. The percentage of complaints that were inadmissible was the highest in the last four years. And

¹² [Eighth Report to the Sixth Senedd under Standing Order 22.9](#)

¹³ [Tenth report the Sixth Senedd under Standing Order 22.9](#)

¹⁴ [Eleventh report to the Sixth Senedd under Standing Order 22.9](#)

¹⁵ [Twelfth report to the Sixth Senedd under Standing Order 22.9](#)

¹⁶ On 13 May 2024 I decided that both were admissible and started my investigation of them

¹⁷ My report on one of them was submitted to the Committee on 20 May 2024.

leaving aside those about late notification of changes to registered interests, only seven out of the 190 complaints required a full investigation with none of them being found by the year-end to have amounted to a breach. On one view, the increase in the number of complaints is to be welcomed as demonstrating a greater public interest in and closer scrutiny of the work and conduct of Members of the Senedd. That public scrutiny plays an important part in our democratic process.

16. As previously, the awareness sessions I provided to all party Groups resulted in a number of Members updating their entries in the Register outside the period of four weeks that is allowed under Standing Orders. All 17 such instances were, as required by law, referred to me for investigation. In all instances the Committee agreed my recommendation that, as the errors were of a minor nature and had been rectified, I should not continue my investigation of them.

17. Comments made by Members on social media were, despite the awareness sessions and warnings given by the Committee, by far the most common subject for complaints. Although almost all of these turned out to be inadmissible, even inadmissible complaints take up my time and that of the Members. I would again urge Members to take great care when posting, sharing or liking anything on social media and to try to avoid doing anything that might result in a complaint against them.

18. During the year there was only one complaint by a Member against another Member. That complaint was admissible and was under investigation at the year-end.¹⁸

19. A high proportion of my time was taken up with work in two areas: the complaint against Rhys ab Owen MS and complaints about the change to the default speed limit on restricted roads.

Complaint against Rhys ab Owen MS

20. Although this complaint was received in August 2022 my investigation of it was ongoing at the start of the reporting year.

21. The complaint was that late on 30 June 2021 Mr ab Owen had been very drunk in Wetherspoons Mount Stewart in Cardiff Bay, that in a street nearby he had twice called the female complainant ‘a bitch’, that he had put his arm round her and pulled her body close to his and that in the rear of a taxi he had placed his hand on her thigh close to her groin and

¹⁸ The report of my investigation was submitted to the Committee on 20 May 2024

squeezed it hard. Mr ab Owen accepted that he had been very drunk but denied the other allegations.

22. The investigation entailed a significant number of witness interviews, many of them on oath, and the obtaining and consideration of relevant documents. Much time was taken considering and responding to numerous points raised by Mr ab Owen, who was represented by senior counsel throughout, about the fairness of the process being followed and whether his Human Rights had been contravened. As a result, it was not possible to submit my report to the Committee until May 2023.

23. Before the Committee, Mr ab Owen renewed his representations about the fairness of the process and its alleged non-compliance with ECHR standards. He also raised a number of factual matters some of which required further investigation. The Committee's Ninth Report was not published until March 2024.¹⁹

24. In that Report the Committee agreed my opinion that Mr ab Owen had breached Rule 3 of the Code of Conduct (duty not to bring the Senedd into disrepute), Rule 4 (duty not to subject anyone to unwanted behaviour, bullying or harassment) and Rule 6 (duty not to subject anyone to an excessive or abusive personal attack of any kind). The Senedd accepted the Committee's recommendation that Mr ab Owen should be suspended for a period of 42 sitting days.

25. The Committee also made a number of recommendations about the conduct of investigations all of which have been implemented.

¹⁹ [Ninth Report to the Sixth Senedd under Standing Order 22.9](#)

Complaints about the 20mph default speed limit

26. The 20mph default speed limit on restricted roads came into effect on 17 September 2023. Thirty complaints were received about comments, almost all of them on social media, relating to it. Fifteen of these of the complaints were about comments made by those opposed to the new limit: the other half were about comments made by those who supported it. Of these 30 complaints 26 were inadmissible, two were admissible and the admissibility of the remaining two had not been decided at the year end. Following my investigation of one of the two almost identical admissible complaints, the Committee agreed my opinion that no breach of any relevant provision had occurred.²⁰ My investigation of the other admissible complaint was then discontinued in accordance with paragraph 5.1(b) of the Procedure.

²⁰ [Eighth Report to the Sixth Senedd under Standing Order 22.9](#)

4. Other work

- 27.** I again provided awareness sessions for Members from all parties. For the first time I provided a similar session for Members' support staff and party staff. All these sessions were well attended and the feedback received was positive.
- 28.** I identified and reported further areas in which the Measure and the Procedure could be improved. The Measure has now been in place, without any amendment for 15 years. During that period a number of deficiencies have been identified. Amongst the most important of these is the absence of a provision empowering the Commissioner to initiate an investigation without the need for a complaint. A power for the Commissioner to initiate an investigation is common in other jurisdictions. The absence of it in Wales renders Rule 18 (duty to comply with the Procedure); Rule 20 (duty not to lobby the Standards Commissioner) and Rule 23 (duty not to make frivolous, vexatious or manifestly unfounded complaints) of the Code of very limited value as it is hard to see how anyone other than the Commissioner could make a complaint about them. Whilst I appreciate the pressures on Senedd time I do not consider that reform of the Measure should remain on the 'back burner.'
- 29.** I met with the Leader of the Welsh Conservatives and the Acting Leader of Plaid Cymru to discuss the adequacy their party's procedures for dealing with complaints made by staff about the conduct of Members. Although the Leader of Welsh Labour did not take up my offer of such a meeting, he provided me with comprehensive information about the action taken and planned to ensure that the internal complaints process was fit for purpose.
- 30.** I renewed my contacts with the Northern Ireland Assembly Commissioner for Standards and met with Daniel Greenberg following his appointment as the Parliamentary Standards Commissioner. I again attended the Standards Network where I was able to discuss matters of mutual interest with Commissioners and their staff from across the British Isles.
- 31.** I participated in the Abuse in Politics event organised by the Welsh Government.
- 32.** My staff and I again responded to numerous requests for advice about the complaints process and other matters some of which had nothing to do with my functions as Commissioner. In all instances they were dealt with sympathetically and, where appropriate, the person was directed to the appropriate organisation.

5. Expenditure

33. Under section 3 and paragraph 5 of the Schedule to the Measure, the Senedd Commission must pay to the Commissioner the salary and allowances agreed in the terms and conditions of appointment. The Commission must also pay all reasonable expenses lawfully incurred by the Commissioner in employing staff, securing the provision of goods or services, and paying allowances or expenses to witnesses.

34. The expenditure by the Commissioner's office for the year ended 31 March 2024 is shown in Table 4.

Table 4 – Expenditure of Commissioner’s office

	2019 - 20	2020-21	2021-22	2022-23	2023-24
	£	£	£	£	£
Commissioner employment costs (Note 1)	17,446	0	30,538	34,692	48,847
Commissioner T & S	376	0	1,014	4,264	5,199
Commissioner other costs		0	0	0	0
Acting Commissioner employment costs (Note 1)	10,188	42,517	0	0	0
Acting Commissioner T & S	2,655	105	0	0	0
Acting Commissioner other costs		0	0	0	0
Total Commissioner and Acting Commissioner expenditure	30,665	42,622	31,552	38,955	54,045
Employment costs (Note 2)	123,630	92,834	70,874	71,115	74,448
Staff T & S	511	0	0	0	0
Staff other costs	0	0	0	0	0
Total Staff costs	124,141	92,834	70,874	71,115	74,448
Other liabilities incurred²¹	1,528	25,259	4,957	9,524	5,498
TOTAL COMMISSIONER OFFICE EXPENDITURE	156,334	160,715	107,383	119,595	133,992

Note 1 - Commissioner remuneration + employer NIC

Note 2 - Staff salary + employer NIC + employer pension contribution

35. The increase in the cost of running the Commissioner’s office was due to the substantial increase in the number of complaints received, the increased number of full investigations undertaken and the further work in relation to my investigation of the complaint against Rhys ab Owen MS. Despite that increase, the total cost remains more than 16% less than the expenditure in 2020-21.

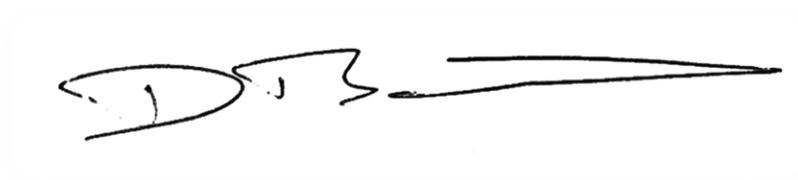
²¹ This included payments for legal services, transcription, media handling and witness expenses.

6. The year ahead

- 36.** In addition to dealing with complaints, I shall during 2024-25 continue to work closely with the Committee and its staff to make the complaints process more effective and efficient by identifying anything in the Measure, the Code and the Procedure that could be improved.
- 37.** I shall deliver further awareness sessions for Members and their staff.
- 38.** The work to update and relaunch Commissioner's website will be completed.
- 39.** I shall continue my consideration of lessons to be learned from the investigation of the complaint against Rhys ab Owen MS.
- 40.** I shall continue to liaise with those undertaking similar work in other jurisdictions with a view to identifying and introducing best practice.

7. Acknowledgements

41. Once again, I have been most ably supported by Jonathan Thomas, my Investigations and Complaints Manager. I was also much assisted in my work by the professional and helpful approach of Merial Singleton, the Clerk to the Standards of Conduct Committee. I am most grateful to them and to the many other Senedd Commission staff who helped me to discharge my duties.

A handwritten signature in black ink, appearing to read 'Douglas Bain', is centered on the page. The signature is written in a cursive style with a long horizontal stroke extending to the right.

Douglas Bain CBE TD

Senedd Commissioner for Standards

15 July 2024



Agenda Item 8

Document is Restricted

Dignity and Respect: Building Users Survey Results

June 2024

Background to the survey

In autumn 2023, dignity and respect surveys were undertaken for Members, Member Support Staff and Senedd Commission employees. Subsequently, the Committee on Standards has asked whether the Commission is seeking assurance around Dignity and Respect issues from other users of the Senedd estate such as contractors.

The Commission recognises that creating and sustaining a culture of dignity and respect requires engagement with other frequent users of the building, both to ensure that all users understand the expectations upon them and, importantly, to ensure they are aware of what to do if they feel they have not been treated with dignity and respect. As the controller of the building, we are keen to ensure that any building users are treated with respect.

Options for building users who aren't Members, Member Support Staff and Senedd Commission to raise concerns about dignity and respect are outlined on the Senedd external website: [Making a complaint if you are not employed by the Senedd or a Member of the Senedd](#)

Purpose of the survey

The purpose of the Dignity and Respect survey is to help us understand views from building users related to:

- Whether there is any inherent culture of bullying or harassment that needs to be addressed;
- Views on the processes and support in place; and
- What future activities may be needed.

Building users covered by the survey

The Senedd estate is used regularly, by a large number of people in addition to Members, Member Support Staff and Senedd Commission employees. There are around 560 (full and temporary) passholders who are not Members, Support Staff or Commission Staff. These include contractors, subtenants within Tŷ Hywel, (such as the police, broadcasters, Welsh Government civil servants, special advisers (SpAdS), independent advisers and the Senedd’s external stakeholders (for example, the Standards Commissioner and Members of the Independent Remuneration Board). This survey was available for these building users to complete.

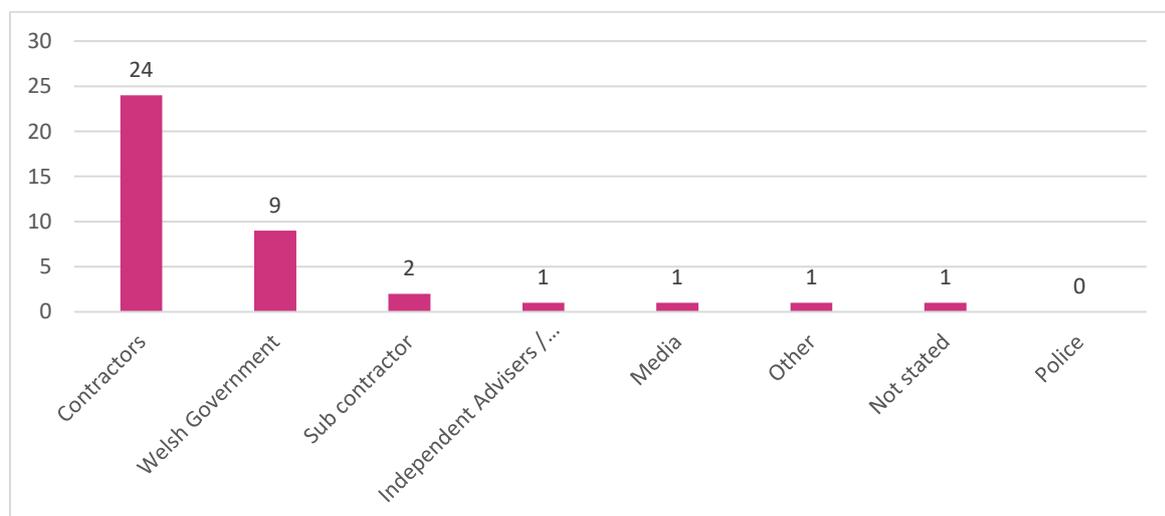
Methodology and response rates

The survey was conducted via MS Forms and via paper copies. It was live from 10 May to 31 May 2024.

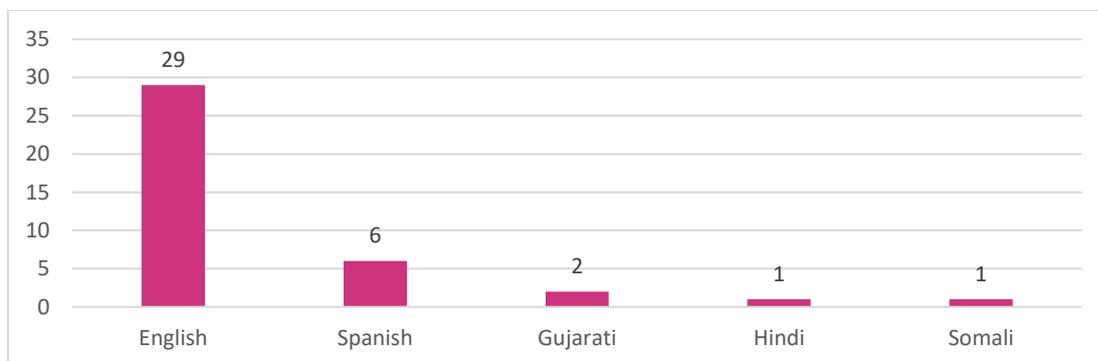
Building users as identified on the list above were encouraged to complete the survey, which was communicated to the named contact for each relevant organisation by their Senedd Commission contact. asking for the survey to be forwarded to relevant staff. The survey was also sent to the Senedd’s external advisers and hard copies were provided.

The total number of responses was 39 out of 560 passholders. The findings show the views of respondents who chose to participate in the survey, which may not be representative of the views of all passholders/ building users. Some of the 560 passholders are very occasional visitors to the Senedd estate.

The total number of responses was 39 breaks down between the different types of building users as:



As some building user's first language is not English or Welsh, the survey was provided in the seven most frequently used languages to reduce barriers to completion. The graph below shows the languages the survey was completed in.



Comparison to other surveys

Throughout this document, reference has been made to the results of the dignity and respect survey for Senedd Commission staff which was undertaken in autumn 2023. However, comparisons should be read with caution, due to the difference in the employment relationship, as well as the likely difference in response rates from the overall groups¹.

¹ The response rate for Commission staff was 71%. There are 560 passholders who could be eligible to complete the survey. However not all of these passholders will be regular building users, so the response rates are not comparable.

Key Findings

1. Do you know how to report inappropriate behaviour?

	Commission staff – Autumn 2023 (for point of comparison)	Building users With my own employer	Building users With the Senedd direct ²
Yes	76.8%	87.1%	44.5%
No	5.3%	5.1%	22.2%
Not sure	17.8%	7.7%	33.3%

*Do you know where you can access guidance, advice or speak with someone if you're not ready to make a complaint or unsure of the correct route?

	Commission staff – Autumn 2023 (for point of comparison)	Building users With my own employer ³	Building users With the Senedd direct ⁴
Yes	72.3%	76.3%	46.4%
No	10.4%	10.5%	17.9%
Not sure	17.2%	13.2%	35.7%

2. Do you know how to seek support whether you decide to make a formal complaint or not?

	Commission staff – Autumn 2023 (for point of comparison)	Building users With my own employer	Building users With the Senedd direct ⁵
Yes	65.4%	76.9%	44.4%
No	12.2%	12.8%	18.5%
Not sure	22.3%	10.3%	37.0%

² 12 respondents did not enter a response to this question so rates are calculated based on those who did respond (27).

³ One respondent did not enter a response to this question so rates are calculated based on those who did respond (38).

⁴ 11 respondents did not enter a response to this question so rates are calculated based on those who did respond (28).

⁵ 12 respondents did not enter a response to this question so rates are calculated based on those who did respond (27).

3. In the last 12 months have you experienced inappropriate behaviour in the workplace by anyone covered under our policy – Members, Support Staff, Commission staff or contractors?

	Commission staff – Autumn 2023 (for point of comparison)	Building users
Yes	3.8%	20.5%
No	89.8%	74.4%
Not sure	6.3%	5.1%

4. Who demonstrated the inappropriate behaviour that you experienced? (select all that apply)

Contractors	4
Members	4
Member Support Staff	2
Members of the public	1
Commission staff	0

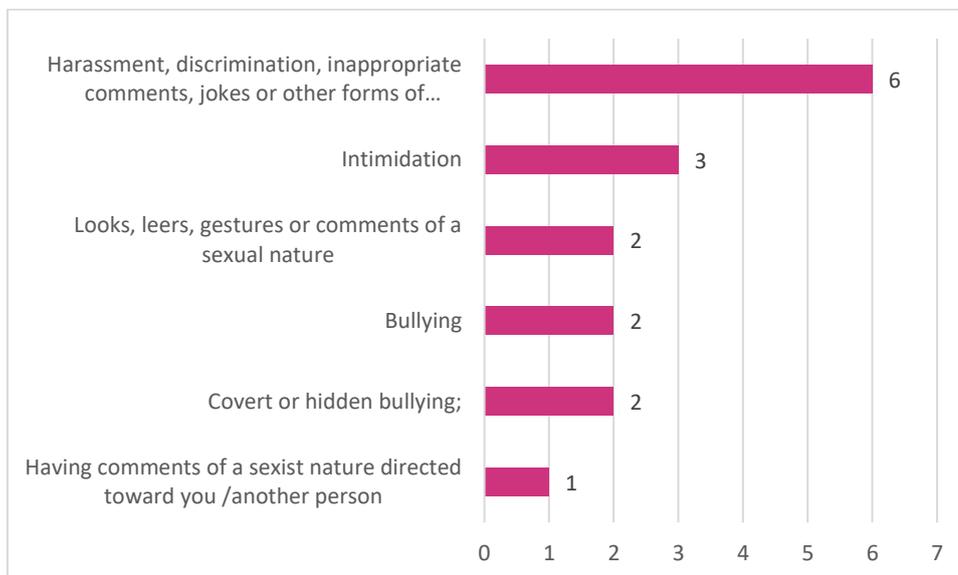
5. In the last 12 months have you observed inappropriate behaviour in the workplace by anyone covered under our policy – MS, Member Support Staff, Commission staff or contractors?

	Commission staff – Autumn 2023 (for point of comparison)	Building users
Yes	5.1%	15.4%
No	86.9%	76.9%
Not sure	8.0%	7.7%

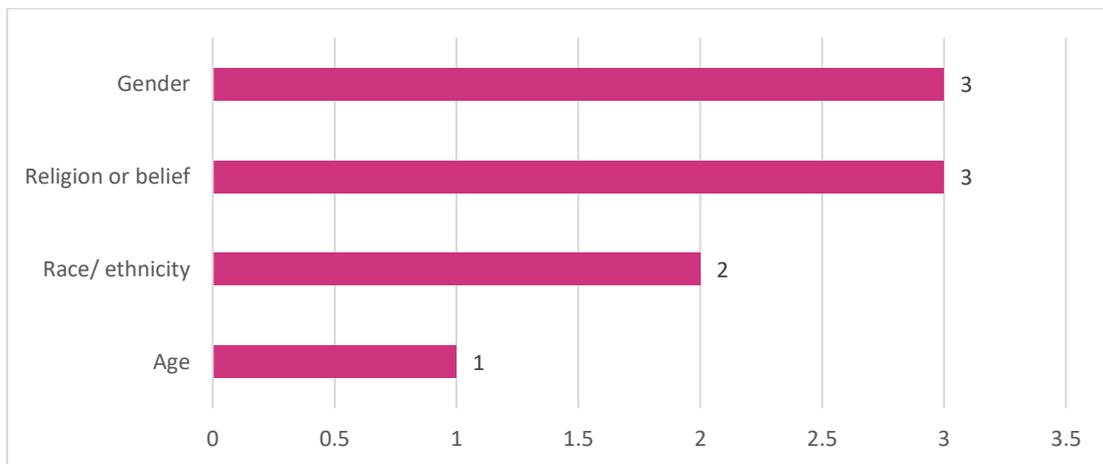
**6. Who demonstrated the inappropriate behaviour that you observed?
(select all that apply)**

Contractors	4
Members	3
Member Support Staff	2
Members of the public	0
Commission staff	0

7. If you have been subject to, or witnessed inappropriate behaviour in work in the last 12 months, what type of inappropriate behaviour was this?



8. If you have been subject to, or witnessed inappropriate behaviour in work in the last 12 months, was this behaviour linked to any of the following?



9. Can you tell us whether, in the last 12 months, you have approached someone to call them to account over something you deem to have been inappropriate behaviour?

Yes	5.1%
No	84.7%
Prefer not to say	10.2%

10. Responses to the question: Are there any improvements to the Dignity and Respect Policy or process that you think we could make?

Sometimes it feels like the language barrier turns out to be the issue for joking. Which needs to be improved.

Yes definitely. I believe that when we are at any work, shouldn't behave with others looking at what job they are doing. Everyone should be treated equally and harmoniously, which I am experiencing less here. Because there are few employees won't even smile. Hence the practice needs to be improved.

It needs to improve

There should be, if possible, a whistleblowing office. And nursing

Making sure contractors are aware of how and who to communicate with at Senedd should this be an issue.

Know where and who I can access support and advice from.

making processes to report clear to those occupying Ty Hywel office space directly to individuals not just their employer to ensure each person working in the Senedd knows about processes

11. Responses to the question: If you have experienced or observed inappropriate behaviour but not reported it, please tell us why you did not'

Don't believe it will be taken seriously

By ignoring these behaviours, trusting and persuading the mind, I have ignored it. And have not taken any step as didn't have courage to tell anyone or be a joke on myself. And ignored thinking it as a joke and continue to do so.

Seemed pointless - senior member, I would not want to damage their position or create animosity

I have attempted to deal with this myself and have called it out.

Not feeling confident to make a point about a member's behaviour. Did disclose to line manager but we didn't take it further.

12. Responses to the question: Is there anything else you would like to tell us about any of the topics covered by this survey?

Raised with line manager
We keep working our way through ignoring inappropriate behaviour.
Behaviour is of a consistent high standard even over trivial matters such as queuing in the canteen or car parking.
Managers should be more strident in intervening rather than let the individual that is subject to the abuse continue to try and deal with it themselves.

Analysis and next steps

Key points:

Processes and support

- The survey results show that building users have a good understanding of their own employer's processes on reporting inappropriate behaviour and accessing guidance and support. However, there are lower levels of understanding of Senedd processes, with fewer than half of respondents agreeing they know how to report inappropriate behaviour, obtain guidance and advice, and access support within the Senedd.

Culture

- The majority of respondents say they have never experienced or observed inappropriate behaviour on the workplace.
- No respondents reported experiencing inappropriate behaviour by Senedd Commission staff in the workplace in the last 12 months.
- Nevertheless, 20 per cent of respondents said they have experienced inappropriate behaviour in the workplace (by Members, Support Staff, Commission staff or contractors). This compares to 3.8 per cent of Commission staff (13 out of 337). **However comparisons should be made cautiously due to the likely difference in response rates from the overall group⁶.**
- The type of inappropriate behaviour most likely to be experienced or observed was "harassment, discrimination and inappropriate comments",

⁶ The response rate for Commission staff was 71%. There were 560 passholders eligible to complete the survey. However not all of these passholders are regular building users, so the response rates are not comparable.

as well as intimidation. This is the same as the main reasons cited by Commission staff.

Proposed actions:

The following actions are proposed following the survey work:

- Provision of a short awareness-raising session that will be offered to third party building users. This will be aimed at raising familiarity with the dignity and respect policies and process in the Senedd, the standards expected, and sign posting to help and advice.
- Further periodic surveys to track progress and allow comparisons to be drawn between different building users. (Since the next Dignity and Respect survey for Members and Commission staff is due in the autumn term, it is proposed that these are undertaken concurrently from 2025 onwards.
- Communication of the proposed new Declaration on Dignity and Respect when available.
- Consideration of how an expectation of and commitment to Dignity and Respect can be required for building pass holders.



House of Lords Commissioners
for Standards

Annual Report 2023–24



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Foreword

This is our third annual report as the House of Lords Commissioners for Standards. Having two Commissioners has continued to prove to be valuable. By dividing cases equally between us, we can ensure timely investigations, as well as take advantage of opportunities to discuss cases and ensure we maintain a rigorous and fair process.

This report covers the reporting year from 1 June 2023 to 31 May 2024. During this period, we considered 75 cases, and completed 14 investigations.

As in our previous annual reports, we include statistics about the work that we have done over the year with comparative figures from previous years, along with brief summaries of our published reports. We have also this year included a new section summarising trends from the year.

This year saw a slight increase in the number of cases considered and investigations completed. We have continued to improve the timeliness of our work, increasing the percentage of complaints that are responded to within 10 days and reducing the average time taken to complete investigations.

This year saw our second investigation that resulted in an agreed resolution. This process, subject to the discretion of the investigating Commissioner, allows a complaint of bullying, harassment or sexual misconduct to be resolved by agreement between the parties, without requiring a report to be published. We have found this to be a useful tool in helping to facilitate an acceptable outcome for all parties.

As Commissioners, we continue to engage with other standards bodies, including attending meetings with officials from across Parliament and Government, and roundtables facilitated by the Chair of the Committee on Standards in Public Life. A review of the Independent Complaints and Grievance Scheme was undertaken this year by Paul Kernaghan CBE, QPM. We welcome his findings on the success of the process followed in the House of Lords and note the recommendations to improve the process further. We also note with interest the Conduct Committee's review of the Code of Conduct. We will welcome the opportunity to engage with this review and look forward to the outcome of the review in due course.

We also note the continued public interest in standards of conduct in the House of Lords, as well as interest in the investigation into Baroness Mone. As set out

in paragraph 145 of the Guide to the Code of Conduct and on our website, we are unable to finalise or publish any report concerning Baroness Mone while any criminal investigation is under way. Once any criminal process is complete or has ceased, the investigation will be completed and the report will be published.

Our office is currently composed of two and a half members of full-time equivalent staff employed by the House of Lords Administration: the Standards Clerk, the Assistant Standards Clerk, and the Conduct Assistant. This is an appropriate level of staffing for our workload, but our office includes the capacity to increase staff support if necessary. We have also benefitted from the support of ICGS independent external investigators when investigating complaints relating to bullying, harassment and sexual misconduct. We would like to thank Michael Torrance and Melanie Moore for all their work, as they have both this year been promoted out of our office, and welcome Gabby Longdin, Standards Clerk, and Lucy Valenza, Conduct Assistant, to our office.

Finally, we continue to be grateful to those who have come forward with complaints and to members for their cooperation in responding to our work on those complaints.

Martin Jelley QPM DL

Akbar Khan

Commissioners for Standards

Overview of the year

Statistics on the Commissioners' work

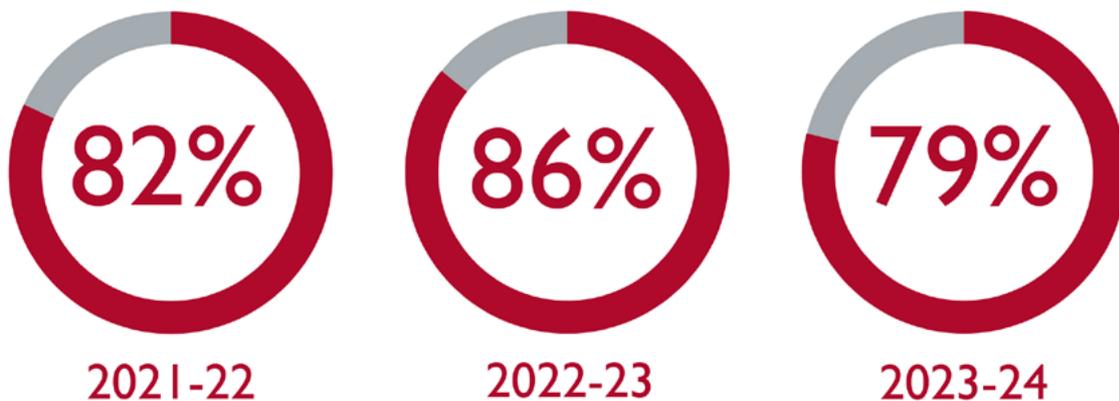
Number of cases considered (including ongoing cases not yet reported)



Percentage of complaints answered in 10 working days



Percentage of cases dismissed following preliminary assessment



Number of investigations completed

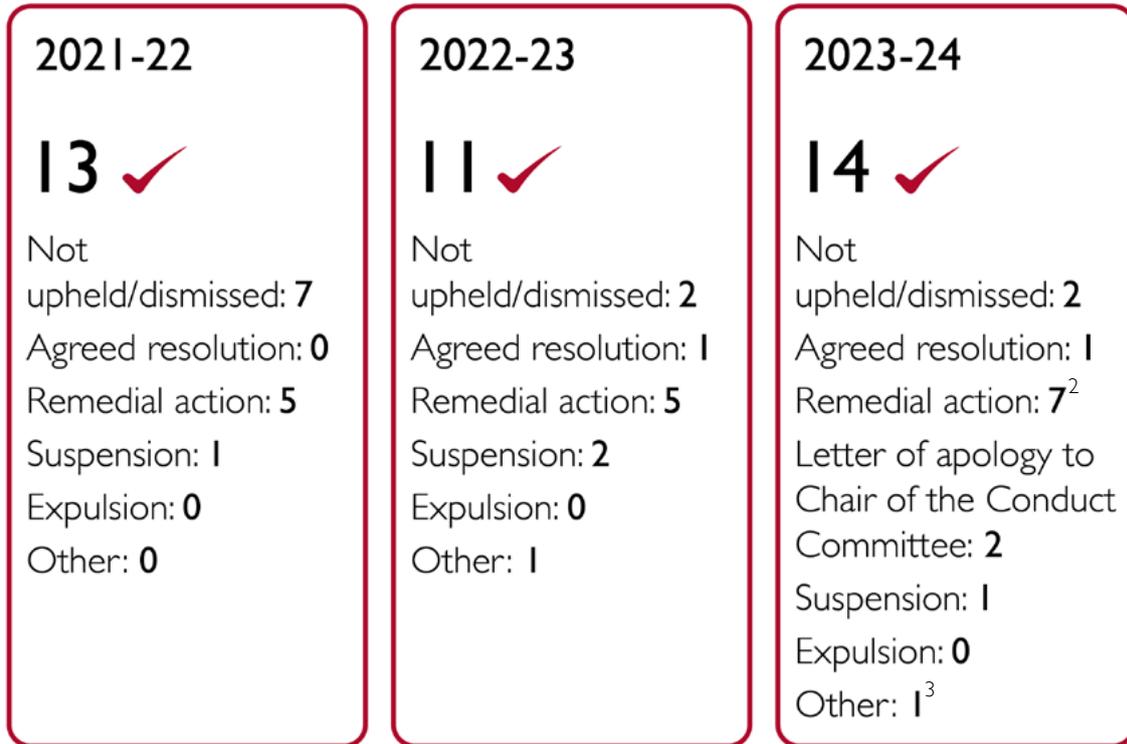


Number of breaches of provisions of the Code of Conduct¹



¹ Paragraphs relate to the 13th edition of the Code of Conduct.

Investigation outcomes



2 Remedial action may be agreed if the Commissioner finds a breach to have been minor and it is acknowledged by the member concerned. This year, remedial action has included correcting the members' register of interests, and sending a letter of apology to the Chair of the Conduct Committee.

3 The Conduct Committee recommended a suspension from the House for three weeks with a ban from purchasing alcohol on the parliamentary estate for 12 months. Due to the dissolution of Parliament the sanction has yet to be considered by the House.

Average time taken to conclude investigations (working days)



Trends from the year

In this section we outline trends we've seen in complaints and investigations through the year.

A number of investigations we launched this year were about members' registration of interests. There were several cases where members had not registered non-financial interests, when they held roles such as trustees of charities. As detailed below, we found that many of these breaches of the Code were minor and inadvertent, and they were resolved through remedial action.

A particular issue arose in cases in which members were both a trustee of a charity and a director of the charity's corporate arm. The Guide to the Code of Conduct requires all directorships to be registered, yet in some cases the member registered only the trusteeship and not the directorship. If a member is unsure whether to register an interest the Registrar of Lords' Interests is available to advise.

This year, 79% of cases considered at preliminary assessment were dismissed. To proceed to investigation, complaints must be within the scope of the Code of Conduct and be supported by *prima facie* evidence of a breach of the Code. Complaints that fell outside the scope of the Code of Conduct included those relating to a member's non-parliamentary activities, and those relating to a members' expression of views or opinions.

4 This investigation began in the previous reporting year.

The House of Lords Commission released social media guidance for members earlier this year.⁵ Social media has continued to constitute a high proportion of complaints: 27% of cases that were dismissed following preliminary assessment related to members' social media. This includes several cases in which numerous complaints were submitted about the same social media activity, which were considered as one case. This year we did not investigate any complaints about members' social media activity. This was because, after conducting preliminary assessments, we determined that the conduct complained of was not part of the members' parliamentary duties or activities, or was an expression of a members' views and opinions, both of which fall outside our remit.

This year included two completed investigations on misuse of parliamentary facilities. During these investigations, the members involved expressed confusion about the proper use of parliamentary accommodation. The rules on the use of facilities are available for all members in the *Handbook on facilities and services for members and their staff*, and the Director of Facilities is available to advise on the proper use of parliamentary facilities.

There were two investigations this year in which members referenced advice they received from Government officials. While members may be subject to other standards regimes which have overlapping rules, members should not rely on advice concerning other standards rules when ensuring their compliance with the House of Lords Code of Conduct.

Finally, during several investigations members told us they were unclear about, or unaware of, the relevant rules in the Code of Conduct and Guide. We note that in launching its review of the Code, the Conduct Committee has made improving the clarity of the Code a priority. However, it remains at all times incumbent on members to be aware of, and comply with, all rules. If a member is unsure, advice can always be sought from the Registrar.

5 House of Lords Commission, *Social media guidance for members of the House of Lords*: committees.parliament.uk/publications/42617/documents/211805/default.

Investigations

We completed 14 investigations in this reporting year, which are summarised below. Further investigations that began in this reporting year, but were not completed, will be included in next year's annual report.

One investigation this year was resolved by an agreed resolution, and therefore no report was published and there is no summary below. One investigation referred to below was finalised this year but initiated in the previous reporting year, 2022–23. While we have organised the investigations by category for ease, some investigations covered multiple breaches of the Code.

All reports on cases that were resolved by remedial action or dismissed are published by the Commissioners. Where reports were made to the Conduct Committee, either due to the recommended sanction or due to an appeal, the Commissioner's reports are annexed to the Conduct Committee's reports. All our reports, including those published by the Conduct Committee, are on our webpage on the parliamentary website: parliament.uk/hl-standards.

Bullying, harassment or sexual misconduct

In this reporting period, we completed one investigation into a complaint made under the bullying, harassment and sexual misconduct provisions in the Code of Conduct, and one complaint relating to these provisions was resolved by agreed resolution.

Lord Ranger of Northwood⁶

I received two complaints from two members of the parliamentary community about Lord Ranger of Northwood. The complainants alleged that one evening they were approached by Lord Ranger in Strangers' Bar, who they believed was heavily intoxicated. During their interaction, they said that Lord Ranger had displayed unprovoked aggressive behaviour by swearing and shouting at them, and invading their personal space.

After taking evidence from the complainants, Lord Ranger and witnesses, I found that Lord Ranger's behaviour constituted bullying and harassment, and therefore that he had breached paragraph 19 of the Code of Conduct. I recommended to the Conduct Committee that Lord Ranger should be suspended from the House

⁶ Investigated by Martin Jelley.

for one week. The Conduct Committee considered my report, and sought further representations from myself, the complainants and Lord Ranger, on the recommended sanction. After considering aggravating and mitigating factors, the Committee concluded that Lord Ranger should be suspended from the House for three weeks and be banned from purchasing alcohol on the parliamentary estate for 12 months.⁷

Declaration and registration of interests

We investigated six complaints about non-registration or non-declaration of interests. Two further investigations (Lord Skidelsky and Lord Mann) also involved non-registration of interests, and are covered in another section.

*Baroness Amos*⁸

I received a complaint from a member of the public that Baroness Amos had failed to register five roles she held.

Three of the interests complained of involved Baroness Amos holding concurrent roles as both a trustee of a charity and a director of its associated company. Baroness Amos responded setting out the times during which she held each role, and provided evidence of registering one of the roles.

For two roles I was satisfied that there was no breach. In one case Baroness Amos did not hold the position alleged, and in the other Baroness Amos had registered the role but it did not appear on her register of interests due to administrative error. I found that Baroness Amos had breached paragraph 17 of the Code in relation to one role for which she registered her interest late after the permitted month. For the final two roles, I found that she had breached paragraph 14(a) of the Code in not registering non-financial interests, one as a director, and the other as a trustee and director. I considered these to be minor and inadvertent breaches. I recommended that Baroness Amos update her register with respect to the one current interest that was incorrect, and so the case was resolved by remedial action.

*Lord Fink*⁹

I received a complaint from a member of the public that Lord Fink had incorrectly registered several roles.

7 Due to the dissolution of Parliament, the sanction has yet to be considered by the House.

8 Investigated by Martin Jelley.

9 Investigated by Martin Jelley.

Lord Fink explained that when he returned from leave of absence (during which he did not need to have any entries in the Register of Lords' Interests), he had registered a number of interests. In one case, his interest was registered before his leave, but due to administrative error on his part it was not re-registered. Lord Fink's remaining interests were registered, however the names and categories were not all accurate. Therefore, Lord Fink breached paragraphs 14(a) and 17 of the Code of Conduct.

As I considered these to be minor breaches of the Code with mitigating factors, I proposed that Lord Fink correct his registration of interests. He corrected his entries accordingly, and so the case was resolved by remedial action.

Baroness Kennedy of The Shaws¹⁰

I received a complaint from a member of the House, Lord Jackson of Peterborough, that Baroness Kennedy of The Shaws had not registered her interest in the Sigrid Rausing Trust.

After consulting the Register of Lords' Interests and Companies House records, I considered there to be *prima facie* evidence that Baroness Kennedy had not registered her interest as a trustee and unremunerated director of the Sigrid Rausing Trust.

Baroness Kennedy responded that her late registration of her trustee role was an oversight, and she provided me with email correspondence showing she had been unaware that she had been appointed a director of the associated company. I therefore found Baroness Kennedy breached paragraphs 14(a) and 17 of the Code of Conduct. I considered these breaches to be minor and inadvertent. The case was therefore resolved by remedial action, through Baroness Kennedy correcting her entry in her Register of Lords' Interests.

Lord Kennedy of Southwark¹¹

I received a complaint from a member of the public alleging that Lord Kennedy of Southwark had incorrectly registered his interests.

After consulting the Registrar of Lords' Interests, I considered Lord Kennedy's interest in the Credit Union Foundation and Millwall Community Trust showed *prima facie* evidence of breaches of the Code of Conduct. In Lord Kennedy's response to me, he explained the roles he held, and how he had registered them.

¹⁰ Investigated by Martin Jelley.

¹¹ Investigated by Martin Jelley.

I found that Lord Kennedy had correctly registered his interest as Chair and trustee of the Credit Union Foundation. However, while Lord Kennedy had registered his role as trustee of Millwall Community Trust, I found that he had not registered his unremunerated directorship of the associated company, therefore breaching paragraph 12(a)¹² of the Code. I considered this a minor and inadvertent breach, and Lord Kennedy had already corrected his register entry, which I considered sufficient remedial action.

Baroness Smith of Basildon¹³

I received a complaint from a member of the public alleging that Baroness Smith of Basildon had not registered her role as director of the Holocaust Memorial Charitable Trust and her former role as director of Production Exchange Limited.

I found that Baroness Smith's former interest in Production Exchange Limited had been registered correctly. While Baroness Smith had registered her role as trustee of the Holocaust Memorial Charitable Trust, she had not registered her role as a director of the associated company. I found this was a minor and inadvertent breach of the Code. Baroness Smith corrected her entry in the register of interests, which I considered sufficient remedial action.

Lord Vaizey of Didcot¹⁴

I received a complaint from a member of the public alleging that Lord Vaizey of Didcot had not registered his role as a trustee of a UK charity, Common Sense Media.

Lord Vaizey had registered his role as a paid adviser to the US charity Common Sense Media. In his response to me, Lord Vaizey explained that he had believed his role as a trustee to the related UK charity did not require registration, as he had registered his remunerated role for the US charity and believed the two charities were the same body.

I found that Lord Vaizey had breached paragraph 12(a)¹⁵ of the Code of Conduct in not registering his role as trustee of the UK charity; however it was a minor breach for which Lord Vaizey expressed regret. This was resolved by remedial action through a correction of Lord Vaizey's registration of interests.

12 Of the 12th edition of the Code of Conduct, which was in force at the time.

13 Investigated by Martin Jelley.

14 Investigated by Akbar Khan.

15 Of the 12th edition of the Code of Conduct, which was in force at the time.

Notifying the Clerk of the Parliaments of matter under investigation

We completed one investigation primarily concerning notifying the Clerk of the Parliaments that a member is under investigation by the member's professional regulator. One further investigation (that of Lord Skidelsky) related to this and is covered in a later section.

The Lord Bishop of Oxford¹⁶

I received complaints from two members of the public alleging that the Lord Bishop of Oxford had not notified the Clerk of the Parliaments that he was under investigation by the Church of England, which was a potential breach of paragraphs 20 and 21 of the Code of Conduct.

The Bishop of Oxford informed me that none of the complaints against him in the Church of England had reached the stage of an investigation, and that the lessons learned review that was initiated by the Church of England (and which formed the basis of the relevant complaints) was explicitly not a formal investigation or disciplinary process. Furthermore, most of these proceedings took place before the notification requirements were included in the Code of Conduct.

I therefore found that the Bishop of Oxford was not required to inform the Clerk of the Parliaments about the relevant Church of England complaints processes, and so he did not breach the Code of Conduct.

Members' financial support

We completed one investigation arising from a self-referral concerning misuse of members' financial support.

Lord Bird¹⁷

I received a self-referral from Lord Bird, informing me that his wife had been signing his expense and allowance claims on his behalf, which was a potential breach of paragraph 14(c) of the Code of Conduct.

As this resulted from a self-referral, I first received the consent of the Conduct Committee to investigate. As stated in Lord Bird's evidence, and corroborated by the Finance Department, Lord Bird's wife had been signing his claim forms

¹⁶ Investigated by Akbar Khan.

¹⁷ Investigated by Akbar Khan.

since he first joined the House in 2015. This was in contravention of the rules set out in the *Guide to members' financial support*. No issues were raised with the propriety of Lord Bird's claims beyond the authorising signature.

I found Lord Bird breached paragraph 14(c) of the Code of Conduct by having his wife sign his claims. Lord Bird told me he was unaware of the relevant rule and expressed regret. I therefore recommended remedial action. Lord Bird undertook to sign all future claims himself and wrote a letter of apology to the Chair of the Conduct Committee.

Parliamentary facilities

We completed two investigations into misuse of parliamentary facilities, both of which included other breaches of the Code of Conduct and one of which was initiated in the previous reporting year.

*Lord Mann*¹⁸

I received a complaint from a member of the public alleging that Lord Mann had not registered an interest in the form of the staff support he received from the Antisemitism Policy Trust, which he received because of his appointment by the Government as Independent Adviser on Antisemitism. During my preliminary assessment of the complaint, there emerged *prima facie* evidence of a breach of the House's rules on the use of parliamentary facilities.

In evidence Lord Mann told me he used his parliamentary office as the sole office for his role as Independent Adviser on Antisemitism. His member of staff was clear that they supported Lord Mann in his Independent Adviser role and in his parliamentary work. While Lord Mann had declared his role as Independent Adviser, and his staff member registered their interest, Lord Mann had not registered the staff support he received. Lord Mann told me this arrangement was sanctioned by House officials; however accounts from the relevant officials revealed no evidence that this was the case.

I concluded Lord Mann had breached paragraphs 14(a) and 14(c) of the Code of Conduct. In response to both breaches, I recommended that Lord Mann make a personal statement of apology to the House by way of remedial action.

Lord Mann appealed against my findings and my recommended sanction. The Conduct Committee rejected the appeal against my findings but upheld the

18 Investigated by Akbar Khan.

appeal against the recommended sanction. The Committee agreed that a letter of apology to the Chair of the Conduct Committee was sufficient in the circumstances.

*Lord Skidelsky*¹⁹

I received a disclosure from the Charity Commission informing my office that it was investigating the Centre for Global Studies (CGS), a charity chaired by Lord Skidelsky.

After obtaining the agreement of the Conduct Committee to investigate, I took evidence from Lord Skidelsky and two of his members of staff. Lord Skidelsky had been using his parliamentary office as the headquarters of the charity he chairs, which he said supported his academic and parliamentary work. Furthermore, following the Government imposing sanctions on two Russian businessmen who had been the primary funders of the charity, Lord Skidelsky removed the CGS from his entry in the register of interests.

I concluded that Lord Skidelsky breached paragraphs 12(a) and 15 of the Code of Conduct²⁰ in failing properly to register his interests in the charity; the staff support he received from the charity, and the advances and royalties he received from his publications. I also concluded that Lord Skidelsky had breached paragraph 12(c) of the Code by misusing his parliamentary office, and breached paragraph 20 by not informing the Clerk of the Parliaments that he was under investigation by the Charity Commission. I recommended that Lord Skidelsky be suspended from the House for one month.

Lord Skidelsky appealed against my recommended sanction. The Conduct Committee rejected the appeal and upheld the recommended sanction. The House agreed the Conduct Committee report on the case and the recommended sanction.²¹

Parliamentary advice and services

We completed two investigations into complaints about parliamentary advice and services.

19 Investigated by Martin Jelley.

20 This paragraph refers to the 12th edition of the Code of Conduct, which was in force at the time.

21 [HL Deb \(22 November 2023\)](#), Cols 734–735.

*Lord Chadlington*²²

I received a complaint from Lord Foulkes of Cumnock about Lord Chadlington, following an earlier complaint into alleged provision of paid parliamentary advice and services that I investigated and dismissed the previous year. Lord Foulkes alleged that Lord Chadlington had misled my first investigation by not disclosing a phone call he had with Lord Feldman of Elstree concerning PPE, which Lord Chadlington had discussed in an interview with the Guardian subsequent to my investigation.

Lord Chadlington clarified that he was mistaken in saying he had a phone call but there was a text exchange, which he shared with me. Lord Feldman could not recall any phone call due to the high volume of calls he received at the time.

Although it was regrettable the text exchange was not originally shared, I did not consider that the contents would have altered my findings and I accepted Lord Chadlington's account of why it was not shared. I therefore found that Lord Chadlington had not breached the Code of Conduct. During the investigation it was apparent that the complainant had released details of this complaint to the media. In my report I noted that complainants are bound by the Code of Conduct to maintain the confidentiality of all complaints made, in order to ensure the fairness of the process.

*Lord Geidt*²³

I received a complaint from a member of the public alleging that Lord Geidt had breached the Code of Conduct by providing paid parliamentary advice and services to a company, Theia Group Inc. The complaint said that Lord Geidt had provided a presentation on behalf of the company to Ministry of Defence officials.

I launched an investigation into alleged provision of a paid parliamentary service. Evidence confirmed that Lord Geidt had provided introductory remarks to officials on behalf of Theia Group Inc.

I concluded that Lord Geidt breached paragraph 9(d) of the 10th edition of the Code of Conduct. I did not consider this to be a significant breach so recommended that Lord Geidt write a letter of apology to the Chair of the Conduct Committee by way of remedial action.

22 Investigated by Akbar Khan.

23 Investigated by Martin Jelley.

Lord Geidt appealed against the findings. The Conduct Committee rejected the appeal and upheld the findings and recommended sanction.

The complaints process

If an individual is considering making a complaint it is important to note that by seeking support from sources including the independent helpline, they are not committing themselves to making a formal complaint but can simply raise concerns.

Any complaint alleging that a member of the House of Lords, or a member of their staff, has breached the Code of Conduct may be made by email or in writing, to:

The House of Lords Commissioners for Standards
House of Lords
London
SW1A 0PW

Email: lordsstandards@parliament.uk

Anyone making a complaint about bullying, harassment or sexual misconduct by a member, or a member of their staff, may alternatively choose to submit their complaint by calling the ICGS Helpline. The Helpline provides advice and information about the two ICGS policies (the bullying and harassment policy and the sexual misconduct policy) and signposts other available support. They can be contacted on 0808 168 9281 (freephone 9am–6pm, Monday–Friday). The Helpline can also be contacted by email, on support@ICGShelpline.org.uk.

Martin Jelley QPM DL

Akbar Khan

22 July 2024



Eich cyf/Your ref CG/PO/185/2024
Ein cyf/Our ref CG/PO/185/2024

Vikki Howells MS
Chair of the Standards of Conduct Committee
SeneddStandards@senedd.wales

12 July 2024

Dear Vikki,

As you will have heard, during the Stage 3 debate on the Elections and Elected Bodies (Wales) Bill last week I made the following commitment:

“The Welsh Government will bring forward legislation before 2026 for the disqualification of Members and candidates found guilty of deliberate deception through an independent judicial process and will invite the Committee to make proposals to that effect.”

This issue is best considered in detail through the work that the Standards of Conduct Committee is undertaking in its inquiry into Individual Member Accountability, and I therefore invite the committee to make proposals on this important matter as part of that work. I look forward to the recommendations that the Committee makes.

I would also like to take the opportunity to reiterate my offer to continue to contribute and engage with the committee as your inquiry continues.

Yours sincerely,

Mick Antoni AS/MS
Y Cwnsler Cyffredinol
Counsel General

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.