

Senedd Cymru
Y Pwyllgor Safonau Ymddygiad
[Ymchwiliad i Urddas a Pharch](#)

DR03

Ymateb gan: Race Council Cymru

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Welsh Parliament
Standards of Conduct Committee
[Dignity and Respect Inquiry](#)

DR03

Evidence from: Race Council Cymru

Standards of Conduct Committee – Call for evidence -The Standards of Conduct Committee is undertaking an inquiry into Dignity and Respect. Due 8 January 202.

We are aware that the Senedd agreed a dignity and respect policy in 2018 which set out the right for everyone to feel safe and protected when interacting with the Senedd. This policy applied to Members of the Senedd, their support staff and Commission staff. Alongside this, the Fifth Senedd Standards of Conduct Committee undertook an inquiry into ‘Creating the Right Culture’ which sought to make sure the culture in the Senedd was one which was positive and open.

Five years on from the work, the Committee is keen to review the progress made in this area to ensure the conversation in this area continues and consider whether further steps could be taken.

Race Council Cymru (RCC) is delighted to be invited by the Committee to provide evidence to help the committee to understand whether these views are reflected more widely about the policies and systems in place in the Senedd.

Please see RCC’s written evidence in response to the terms of reference below that are relevant to our work:

1. Would you feel comfortable making a complaint about a Member of the Senedd or somebody who works on the Senedd estate? If not, why?

RCC is aware that the Senedd only has its standards commissioner Douglas Bain to look into complaints about politicians, and then the standards committee of the Senedd decides what to do with his investigation and whether to sanction the Senedd member.

- [Harassment complaint system poor - report author](#)
- [Former Plaid worker 'harassed' after speaking out](#)

The review - commissioned internally in the Senedd in 2021 into what the Senedd calls its "dignity and respect" policy - was published for the first time in November 2023. According to the findings, the policy was "implemented and promoted effectively", with 81.3% of staff and politicians surveyed saying they knew how to raise a complaint. In addition to this, 71.2% of staff who work for the Senedd Commission - the civil servants who operate the parliament's services day-to-day - said they would feel comfortable raising concerns using the existing process.

But among staff who support politicians that was lower, 61.7% said they would feel comfortable raising concerns using the existing process.

RCC’s understanding is that Issues can stretch from expenses and spending to whether politicians have harassed or bullied staff. The review said that a concern was expressed by some that the current formal mechanism provided by the Senedd to raise an issue involving a Member of the Senedd (to the Standards

Commissioner) could be viewed as too consequential a process and can be subject to bias. Some member support staff suggested that it would help to have clearer reporting mechanisms and support for staff who raise concerns.

RCC would feel more comfortable making a complaint about a Member of the Senedd or somebody who works on the Senedd estate if the system for reporting concerns about dignity and respect were to be administered and run by an independent body. This is to ensure that the complaint is handled, and information is processed properly and appropriately, in line with the law and relevant guidance. So while the Senedd's policies and procedures should be transparent as a public body, they should also respect the privacy of personal and confidential information, as the law requires. This means being open and honest when accounting for their decisions and actions and give clear, evidence-based explanations, and reasons for their decisions.

2. Do you know how to make a complaint about a Member of the Senedd or somebody who works on the Senedd estate?

RCC is aware that the Senedd's Dignity and Respect policy was approved in May 2018.

- [Dignity and Respect Policy;](#)
- [Dignity and Respect Guidance.](#)

And that the process for raising concerns encourages everyone to use the support available to try to resolve the issue as early as possible. It is refreshing to see that if people are not ready to make a complaint but would like to discuss their concerns, or if they are not certain how to make a complaint, they can contact one of the Senedd's Contact Officers, confidentially. Details about the role of the Contact Officers are contained within our Dignity and Respect guidance, together with their contact details. There is also a freephone number 0300 200 6145 which people can use can speak to one of the Contact Officers beforehand.

RCC is also aware that there are also support options for anyone making a complaint under the current procedures, or those who have allegations against them which can be discussed with the Contact Officers.

For Senedd staff, it is advisable to discuss any concerns with their manager, a Member of the Senedd, a Contact Officer or a trade union representative, as appropriate, so that they can support staff in raising their concerns, whether formally or informally.

- [Support when making a complaint;](#)
- [Support when an allegation has been made against you.](#)

3. Do you feel there are any barriers to you raising concerns about the inappropriate behaviour of a Member of the Senedd or somebody who works on the Senedd estate?

Some of the barriers to raising concerns is the safety and protection of members of the public who raise complaints and also having the confidence that any complaints will be dealt with confidentially and fairly. It is essential that everyone is treated with dignity and respect in and out of the workplace.

In addition, if there is a need to make a complaint about a Member of the Senedd or anyone that works for the Senedd then processes should be clear and accessible for all. This is particularly important for those who may be refugees or asylum seekers or speakers of ESOL who often find that the first barrier to making a complaint is language, cultural nuances and their lack of understanding the full complaints process and whether it may have a negative impact on their UK status.

When we asked RCC staff and our key stakeholders within our Cultural Hub of 25 grassroots communities on raising concerns about the inappropriate behaviour of a Member of the Senedd or somebody who works on the Senedd estate, 26% of people say that the main barrier to making a complaint is not wanting to be seen as a trouble maker - that is the main factor that would prevent them from making a complaint. However, a further quarter say that the main factor that would prevent them from making a complaint is that it would not make a difference and nothing would improve as a result. One in nine people say that the single main reason why they would not complain is that they are worried their job or community relations would get worse as a result. Greater information is the strongest enabler to speaking out. 76% of people say that knowledge of their legal rights after making a complaint would encourage them to speak out about inappropriate behaviour. This is even more important among those with experience of interactions with members of the Senedd or somebody who works on the Senedd estate.

An open and encouraging culture is also seen as a strong enabler: 75% say that being told by the Senedd that they want people to raise any concerns they have would encourage them to do so. Similarly, 73% say that they would be likely to raise a concern or make a complaint about inappropriate behaviour or bullying if the Senedd actively sought their views through questionnaires. Feedback is a key enabler for some: 70% say they would be likely to raise any concerns they had if the Senedd regularly gave information on the actions they have taken in response to concerns. Anonymity is seen as an enabler by 64% of people, but 21% say that it would not make them any more likely to raise any concerns they have.

In addition, having an advocate or third party would make 68% of people more likely to raise any concerns they have. Albeit, this mechanism is seen as more useful for those currently employed by the Senedd than with members of the public.

4. Do you have any suggestions regarding how the complaints procedure could be improved?

It is reassuring to see that the Senedd is seeking views on how things can be improve to help get the complaints procedure right for the future. RCC is aware that organisation-wide factors, such as shared expectations and

agreed social norms, are an important influence on the likelihood of bullying and workplace incivility. To mitigate this impact RCC recommends that the Senedd should aim to:

Develop understanding of the components and dynamics of fairness. Insights into this area come from psychology and other research insights, but also from collecting organisational data and personal accounts from the workforce which we believe the Senedd has already been proactive in doing so..

It is important to build a relevant, contextualised approach to how colleagues throughout the Senedd should be treated fairly and communicate these insights widely using a top down, bottom-up approach.

Interventions aimed at reducing incivility are less thoroughly explored than influences, so we recommend prioritising prevention over cure, focusing on the root cause of incivility if any exist. Nonetheless, the Senedd should focus on what makes interventions effective. Notably, on how the complaints procedure could be improved - the Senedd should manage complaint records in line with recognised standards to ensure they are kept and can be retrieved for as long as there is a statutory duty or business need. This can include the need to respond to complaints or to provide relevant information to the Ombudsman.

It is also essential to involve people in the design and implementation of clearer guidance to help make interventions effective. The language used should be kept simple in an infographic style or a short video which should be translated in the languages of Wales: Welsh, English, Polish, Arabic, French, German, Spanish or Mandarin, British Sign Language, Braille and large print to help with accessibility. The document to help people understand who they should contact about different types of complaints needs to be publicly available and in different formats and shared across diverse platforms to reach as many people as possible.

A video of the Contact officers talking anonymously about some of the types of complaints they regularly deal with would also be relevant and welcomed. Fortunately, RCC has found no respondents to be victims of inappropriate behaviour who would feel confident in using the procedure as it currently stands, so there is nothing to report on this. However, it is important to keep interventions wide-ranging, so that they target both individual development and organisational processes. It is therefore advisable that the Senedd creates and maintains reliable and usable records as evidence of their activities. These records should include the evidence considered and the reasons for decisions to help build trust and confidence in the process.

Overall Race Council Cymru (RCC) is delighted to be able to provide evidence to help the Committee to understand whether these views are reflected more widely about the policies and complaints systems in place at the Senedd. We fully endorse that the Senedd is actively seeking suggestions regarding how the complaints procedure could be improved and RCC would be happy to share the ‘Making a complaint’ information below to help raise awareness on behalf of the Senedd where appropriate.

‘If you wish to make a complaint relating to Dignity and Respect, the information below explains the options available to you depending on who you are complaining about:

- [*I am not employed by the Senedd or a Member of the Senedd;*](#)
- [*I am a Member of the Senedd;*](#)
- [*I am a member of staff employed by a Member of the Senedd ;*](#)



- [I am a member of staff employed by the Senedd Commission.](#)

We have made several recommendations above on how things can be improved to help the Senedd get the complaints procedure right for the future, which is essential if we all want to live in truly cohesive communities where everyone feels safe to make a complaint without fear that nothing will happen as a result of their complaint. We hope that the information will aid the Senedd in the final decision making process and or revised procedures and communications.

Yours sincerely,

Nkechi Allen Dawson

Lead Policy Officer

Race Council Cymru



References:

- [Complaints \(senedd.wales\)](#)
- [complaints_procedure-en.pdf \(senedd.wales\)](#)
- [Covid inquiry: Families say Senedd committee not enough - BBC News](#)
- <https://www.bbc.co.uk/news/uk-wales-politics-66979153>