

**Senedd Cymru**

**Y Pwyllgor Safonau Ymddygiad**

**[Cyflwyno mwy o annibyniaeth a chymorth i'r broses gwyno yn y Senedd](#)**

**ICP10**

**Ymateb gan: Manon Antoniazzi, Prif Weithredwr a Chlerc y Senedd**

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**Welsh Parliament**

**Standards of Conduct Committee**

**[Introducing more independence and support into the complaints process in the Senedd](#)**

**ICP10**

**Evidence from: Manon Antoniazzi, Chief Executive and Clerk of the Senedd**

9 December 2025

Hannah Blythyn MS  
Chair  
Standards of Conduct Committee  
Senedd Cymru

Dear Hannah

### **Introducing more independence and support into the complaints process in the Senedd**

Thank you for your letter of 18 November, asking for views on the proposals for increasing the independence of the process and improving the support available for those with concerns about dignity and respect in relation to the Senedd.

I note the proposals you have outlined in terms of the Standards Commissioner and Committee stages of the process. Although several of these matters are beyond the Commission's remit, we are of course supportive of proposals which are intended to build on the work to date to embed principles of trust and respect to enhance our collective culture. It is likely that there will be resource implications to some of these proposals and we await the outcome of your recommendations in due course.

Experience shows us that it is important that the approach to Dignity and Respect is simple and clear from the perspective of people who may wish to make complaints or tackle issues. There is a risk that new procedures, while aiming to increase independence, may inadvertently add complexity. Past feedback highlights confusion about available reporting avenues, support mechanisms, and the clarity of information provided to staff and Members. Setting out clear expectations about the responsibilities of Members as employers, including training but also other aspects of the role would be welcomed.

I have annexed information relating to Section 2, the 'pre-complaint stage', and Section 5, 'other areas for recommendations', which your committee may find helpful in further considering these matters.

### **Section 2, the 'pre-complaint stage'**

In particular, in relation to Section 2, I offer information about the Commission's Contact Officers and also to raise the potential of a role for a Commission Independent Adviser to assist in this area. This could be an alternative route to add additional independence within the system, alongside existing Contact Officers. It is not something currently in place but is something the Commission could explore as we look to appoint the next cohort of Independent Advisers. In addition, the training provided to Commission staff who are Contact Officers could also be extended to representatives of the political groups, either Members or Support Staff, should there be a desire amongst any of the groups to make a similar provision within the group structures.



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In broader terms, the Committee may find it helpful to seek advice in relation to the equality impact of any recommendations you may wish to make in terms of additions/changes to the current arrangements. This was a challenge received to our original Contact Officer arrangements, following which we expanded the quantum of the cohort to increase diversity available to those individuals wishing to interact with them.

Collecting and analysing anonymous data, as well as introducing new reporting mechanisms, raises questions about data protection, confidentiality, and trust. Ensuring that individuals feel safe to report concerns without fear of identification or reprisal is essential. I would like to take this opportunity to flag that there are likely to be complexities around data responsibilities for an independent person discharging this type of role. Again, the Committee may find it helpful to take advice in this context.

### **Section 5, 'other areas for recommendations'**

In relation to Section 5, I have provided details about the Senedd Commission provided training programme available to Members and their staff and routes by which some of your thinking could interface with existing approaches to supporting Members as employers. Information about a Commission pilot to monitor online abuse is also annexed.

The Commission does not have a remit to require Members to adopt particular employer policy content, though several types of policies are tantamount to requirements for any employer, or to mandate training. However, we continue to provide and signpost to templates (such as included in the **Support Staff Handbook** and **toolkit** related to anti-sexual harassment), and provide training and development opportunities to enable Members to operate as employers in a way that is compliant with the law, ACAS guidance and good practice. I have annexed training information.

I wrote to you in September in relation to Commission's engagement with Members' support staff trade unions, setting out the Commission's general approach to delivering support to Members, whilst recognising and respecting their role and autonomy as employers. I will not repeat that information here, other than to highlight that the process for updating Staff Handbook Templates illustrates the way in which Support Staff unions are engaged as a stakeholder by the Commission, whilst respecting that there is no employment relationship between the Commission and Support Staff.

I have also included information about the detail of the process associated with updates to the template policies provided for Members to adopt for their Staff Handbooks, which could, for example, be adapted to encompass consultation with an employers' forum of the type you have indicated. If consistency between Member Offices is seen as desirable, then having templates which meet demand is an important contributor.

I am supportive of proposals to embed an expectation of behaving as upstanding employers within the Code to support clarity about the expectations on Members.



I hope you find this information useful to your considerations.

Yours sincerely,

*Manon Antoniazzi*

**Manon Antoniazzi**

**Prif Weithredwr a Chlerc y Senedd / Chief Executive and Clerk of the Senedd**

Croesewir gohebiaeth yn Gymraeg neu Saesneg. We welcome correspondence in Welsh or English.



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### Contact officers

The Commission has in place a cohort of trained Dignity and Respect Contact Officers. They provide an informal, confidential information service on issues relating to bullying, harassment, and sexual harassment. They receive training before taking on the role and are provided with opportunities for regular refresher training and appropriate supervision/de-brief sessions. The cohort was widened from the initial numbers to provide for greater diversity to eliminate that as a barrier to interaction with them.

The Contact Officers:

- Offer confidential advice to anyone who wants to discuss inappropriate behaviour within the workplace, specifically dignity, respect and inclusion issues.
- Can provide clarity about complaint routes and discuss options available to individuals who have experienced inappropriate behaviour within the workplace.
- Are able to speak confidentially about matters with employees who are more comfortable in doing so than with their line manager.
- Can provide emotional support and signposting to appropriate services.
- Provide anonymised information to a central point to inform reporting on data patterns and to help to identify systemic issues.

The role is not to investigate the issue or make a judgement, but to provide information and signpost and to help the individual clarify for themselves what they would like to do and have the confidence to progress it.

Talking to a Contact Officer is confidential and does not trigger a formal process.

There is no need for information to be recorded – in doing so it could breach Data Protection Act.

Contact Officers can be contacted directly on the Contact Officer telephone line on 0300 200 6145, or you can email the Contact Officers group email at [dignityandrespect@senedd.wales](mailto:dignityandrespect@senedd.wales). If no one is available to take a call, a message can be left, and a return call will be made.



Information on Contact Officers is available on the Contact Officer intranet page.

[Dignity and Respect: Contact Officers](#)

### **Anonymous phonenumber**

Following the 2018 *Creating The Right Culture* report, the Survivors' Trust was commissioned to provide a dedicated anonymous helpline at the cost of £10,000 per annum. However, there was little evidence that this was well utilised or provided value for money. The charity could only point to one call that was clearly linked to the Senedd since the helpline's inception. This was replaced by the Contact Officer phonenumber and email address as detailed above.

### **Commission Independent Advisers**

The arrangements for Independent Advisers are set out in the Commission's governance principles. They act in an independent advisory and non-political capacity. They are expected to offer constructive challenge across the Commission's business with a view to ensuring that all aspects of strategy and delivery are scrutinised for effectiveness and efficiency. They contribute to the monitoring of the performance and progress of the organisation, including the use of human and financial resources, and maintain a critical overview of the organisation's financial controls and procedures.

Independent Advisers represent a rich source of advice and guidance on which the Commission can draw. The current cohort includes an Independent Adviser with experience appropriate to support the Commission in relation to Diversity and Inclusion, which had been identified as an area that would benefit at the time of the last recruitment exercise.

### **Training**

#### *Development support*

The Member Learning and Engagement team provide an extensive range of development opportunities to support Members and their staff in carrying out their work. The team work on an ongoing basis with Members' Business Support to identify additional training and themes which could be beneficial to Members in their role as employers, as well as to those support staff that have line management responsibilities.

In addition to supporting Members in the parliamentary roles, we are focusing particularly on training where there is a legal or reputational risk to Members if they are unaware of the issues. This would typically include awareness of changes to employment law and matters relating to conduct and dignity and respect. The latest addition to the programme is Social Media: Accuracy and Accountability, relating to acceptable online behaviour.

#### *Dignity and Respect training for Members*

The following courses were recommended as essential to Members:

- Standards of Conduct in the Sixth Senedd (as part of Member induction)
- Conduct and Respect at work.
- Gender-Based Violence (offered as both online, trainer-led sessions and a recorded version of the session)



Training offered to Members via party groups during Sixth Senedd (not all groups took up the offer)

- Bystander training
- Anti-Racism training
- Unconscious Bias training
- Race Awareness
- Anti-Sexual Harassment training

*Dignity and Respect training for Support Staff*

- Conduct and Respect at work.

Training offered on the Member's Intranet Learning Calendar

- Gender-Based Violence (offered as both online, trainer-led sessions and a recorded version of the session)
- Creating Psychologically Safe Spaces
- Casework training: Debt, Vulnerability and the Equality Act In Practice
- Safeguarding Adults at Risk
- Race Awareness
- Anti-Sexual Harassment training

*Employer Responsibilities: Member training*

- Core Management Skills for Members
- Setting up my office (new MS) - High level- outline of support available e.g. through the Determination - Employer role - Leading and managing a team (part of Member induction)
- Leadership and Management of your Team (part of Member induction)
- Managing Change for Line Managers
- Team Development Days (bespoke to Member and staff)
- Managing your Staff ~ e-learning
- Power Half Hour: Data Protection
- Power Half Hour: Managing Appraisals
- Power Half Hour: Recruitment and Probation
- Power Hour: Managing Fairly and Effectively

*Employer Responsibilities: Support Staff*

- Line Management
- Coaching Skills and Emotional Intelligence
- Constructive Feedback
- Courageous Conversations
- Delegation Training
- Foundations of Line Management
- Introduction to Line Management
- Managing Change for Line Managers
- Introduction to Members' Business Support
- Power Half Hour – Appraisals
- Power Half Hour – Introduction to Data Protection



- Power Half Hour: Managing Member Budgets
- Power Half Hour: Recruitment and Probation
- Power Hour: Managing Fairly and Effectively
- Recruitment training
- The Coach Approach
- Confidently working with Leadership

### **Members' Security social media monitoring**

Commissioners have recently considered information outlining an increase in online security threats and abuse on social media targeting elected representatives, and an increase in concerns being raised by Members relating to abuse online.

They reviewed how the UK and Scottish Parliaments address this and the proposed options for a similar service at the Senedd, and what further steps the Commission could take to support and protect the safety of elected representatives and their staff whilst engaging with constituents in a digital space. Commissioners agreed to undertake a trial, up to six months, using the existing social media monitoring platform PULSAR to monitor social media platforms for a select number of Members (up to 8), focusing entirely on threats and abuse above the criminal threshold.

The Commission also agreed that the Members' Security Team further explores the feasibility of defensive monitoring and Online Vulnerability Assessments; and works with the Senedd Police Unit to further develop an option to work more collaboratively with South Wales Police and the three other Welsh forces, specifically investigating the feasibility of developing a process to report instances of malicious communications directly to the police when threats and abuse above the criminal threshold are detected.

### **Process for updating Staff Handbook Templates**

Each Member of the Senedd is an employer of their support staff, and Group Leaders have a dual role in that they also employ Group Staff.

The Commission provides, through the Members' Business Support team and Member Learning and Engagement team, support and guidance to Members of the Senedd to support them with their responsibilities as employers of support staff. This support includes publication of a suite of template human resources policies designed for Members to adopt and use in their offices as a Support Staff Handbook.

Geldards LLP were engaged to provide advice, and to draft policies, for inclusion in the Support Staff Handbook. The policies contained in the Support Staff Handbook were previously reviewed and noted by the Independent Remuneration Board of the Senedd. With the exception of the Disciplinary and Grievance Procedures, which are currently mandated by the Independent Remuneration Board of the Senedd, the Handbook is now overseen by a Policy Advisory Group following the framework set out below.

All policies to feature in the Support Staff Handbook are published on the Members' Intranet as



part of the Support Staff Handbook.

Template Policy management framework

This template policy management framework (TPMF) broadly reflects the approach taken by the Commission for Commission policies. The approach is intended to provide a coherent and standardised approach to the creation, approval and implementation of policies provided to Members in the Support Staff Handbook.

This table shows an overview of policy management through the different stages:

Stage	Activities	Outputs
<b>Propose</b>	Identify policy need Define scope and assess impact Engage with Members, support staff and unions Policy proposal is drafted and approved – escalation to Executive Board and Commission (if appropriate, for example where contentious)	Policy proposal
<b>Draft</b>	Draft policy documents Initial EQIA Screening DPIA, if necessary	Draft Policy Document EQUIAS Screening DPIA (if necessary)
<b>Engage</b>	Share with Chiefs of Staff and unions for input*	
<b>Approve</b>	Consider final draft, including any responses from Chiefs of Staff and unions Update EQIA Complete full DPIA, if necessary	Final (approved) Policy Document Final EQIA Final DPIA
<b>Deliver</b>	Policy document is translated and published on Members’ Intranet as part of Support Staff Handbook Communications concerning policy document Consider training need, if necessary	Translated Final (approved) Policy Document Communications / News Items Training session
<b>Manage</b>	Review the policy according to appropriate timescales, including monitoring effectiveness and operation	

\*this group could be added to.



The process presented here delivers standardisation and consistent good practice to the production and on-going management of template policy documents that are contained in the Support Staff Handbook, while retaining the flexibility to react in a timely way to changes which affect our need for policy. The speed at which a piece of policy work is able to move through the process should always be proportionate to the impact of the Policy.

