



Independent
Complaints
and Grievance
Scheme

Independent Complaints and Grievance Scheme

Annual Report | 2025-26

parliament.uk

Published 24 June 2026

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1. About the Independent Complaints and Grievance Scheme

1.1 Our purpose and role

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

1.2 Our principles

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

- Independence and confidentiality are key to reputation and confidence.
- Our work, including improvement, standards and assurance should be informed by the needs of service users and stakeholders, as well as the organisation and should be trauma-informed.
- Quality assurance should be risk-based and designed into the process.
- Where we are able, we will be transparent and share information.
- Collaboration with stakeholders and service users is built into our process and service improvement work.

1.3 Structure of the Scheme

The ICGS is delivered by a number of partners, alongside the ICGS team:

The **ICGS Helpline** is operated independently from UK Parliament and political parties. It is currently contracted by Parliament to the charity Victim Support. It offers confidential support, advice, and guidance to anyone in the parliamentary community who has experienced, witnessed or been accused of bullying, harassment, or sexual misconduct. The Helpline also supports those seeking advice on how to help others — such as line managers or colleagues. It often serves as the first step in understanding options and accessing the formal complaints process.¹

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

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

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

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

Decision-making bodies (DMBs) are the organisations within the parliamentary community who have responsibility for deciding whether or not a complaint is upheld following the conclusion of an investigation. They determine the appropriate action if a complaint is upheld. If the respondent is an MP, the DMB is the Parliamentary Commissioner for Standards. Under Standing Order No. 150, one of the Commissioner’s duties is “to oversee investigations and make findings in cases against Members under the ICGS; to refer such cases to the Independent Expert Panel where a sanction beyond [his] powers is contemplated”.

1.4 Our priorities

We set out refreshed priorities for the ICGS team in October 2025, following the appointment of a new ICGS Director and ICGS senior management team. Our priorities are:

- **Service user focus**

To raise awareness of the Scheme, support everyone who comes to the ICGS to make informed choices, and support all service users in a way that meets their needs.

- **High quality investigations**

To deliver independent, high quality and timely assessments and investigations into bullying, harassment, and sexual misconduct allegations.

- **Building trust and confidence**

To enhance trust and confidence in the Scheme across the parliamentary community through transparency, good governance, collaboration and engagement.

In this transitional reporting year, we are reporting against the three priorities set out by the previous ICGS Director, which were in place for the first half of 2025–26: (1) supporting those who may want to complain, and all users of the Scheme; (2) delivering high-quality and timely assessments and investigations; and (3) working with others to continually improve working culture, promote transparency, and support adherence to the Behaviour Code.

The ICGS's priorities link to the House of Commons Administration strategic priority 'To support our people to thrive' (2023–26 Administration strategy) and support the House of Lords Administration's strategic outcomes of 'Making Parliament safer, more secure, and sustainable' and 'Being an inclusive, diverse and professional workforce, delivering a wide range of services'. The House of Commons Administration published a new strategy for 2026–29 in April 2026 and future reports will align with this strategy.

2 A message from the ICGS Director

This is my first Annual Report as Director of the ICGS, after being appointed to the role in September 2025. This report highlights significant achievements across the Scheme and the meaningful progress we've made in strengthening this vital resource for the parliamentary community.

The three independent reviews of the ICGS to guide and review its implementation have been a catalyst for growth. Each review has driven improvements, helping the ICGS evolve into a credible, resilient, and accountable scheme.

A number of the changes made following Paul Kernaghan's 2024 review of the Scheme have been transformative. They have reshaped how the ICGS operates, how it governs itself, and how it supports those who rely on the Scheme. These changes are already delivering measurable benefits.

I am especially proud that this year's Annual Report highlights the success of a new streamlined initial assessment process. The time taken to decide if a complaint is eligible has more than halved under the new process, ensuring that those seeking redress and resolution receive clarity far more quickly.

Other major improvements we report on include the introduction of end-to-end support for service users, until their case fully concludes decision-making stages, and the establishment of the ICGS Assurance Board.

While it is disappointing that the time taken for investigations was, on average, a month longer than in 2024–25, we were encouraged that 8 out of 11 investigations were completed in 9 months or less, and that investigations which did not involve an MP as a respondent were completed on average within 7 months. Better understanding the drivers of the length of investigations, and improving timeliness, continues to be a priority for us.

I am deeply grateful to the Co-Chairs and members of the ICGS Assurance Board for their commitment, insight, and willingness to engage in creative problem-solving. Their contribution is already shaping a stronger, more accountable ICGS. I also want to acknowledge the importance of the engagement of our Scheme partners, including our decision-making bodies, and the ICGS Stakeholder Forum, whose collective collaboration and challenge continues to be essential to the Scheme's development.

My arrival in September 2025 coincided with the formation of a new ICGS senior management team, including a new Deputy Director and Senior Operations Manager. Together, with the expertise, passion, and commitment of the ICGS team, we have sought to build on the strong foundations laid by our predecessors with an ambition to go further—improving timeliness, strengthening the quality of investigations, and deepening our engagement with service users.

This year, I made it a personal priority to spend meaningful time with service users, both complainants and respondents whose experiences sit at the heart of every investigation we undertake. We know that stepping forward to make a complaint often requires significant courage. For those experiencing harmful behaviours at work, confidence may already be shaken, and the decision to speak up can feel daunting. Equally, we recognise that being named as a respondent can be distressing, unsettling, and can often prompt a wish to quickly resolve matters.

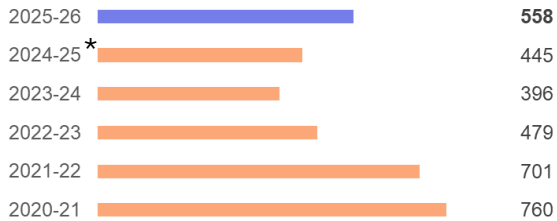
I am grateful to everyone who shared their experiences with me. Their honesty and insight has been invaluable. We will reflect as a team on what we have learned and use these insights in the year ahead to strengthen our engagement, improve our processes, and ensure that every service user—whether a complainant, respondent or witness—feels heard, supported, and treated with fairness and dignity.

Miriam Minty, ICGS Director

3 Key metrics

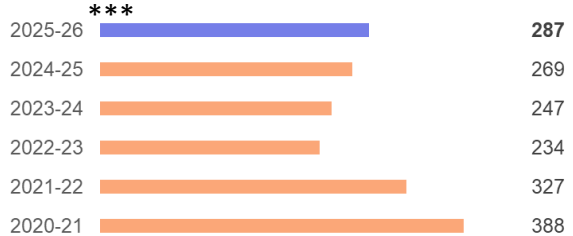
Calls and emails to the ICGS Helpline

558 contacts 2024-25: +113



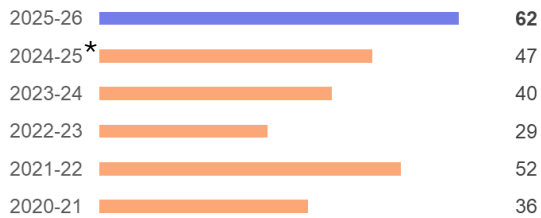
Individuals who contacted the Helpline

287 individuals 2024-25: +18



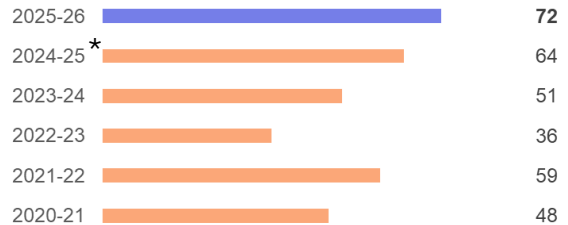
Disclosures**

62 disclosures received 2024-25: +15



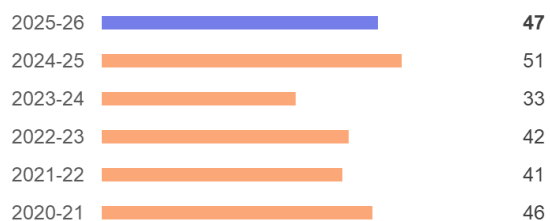
Cases opened**

72 cases opened 2024-25: +8



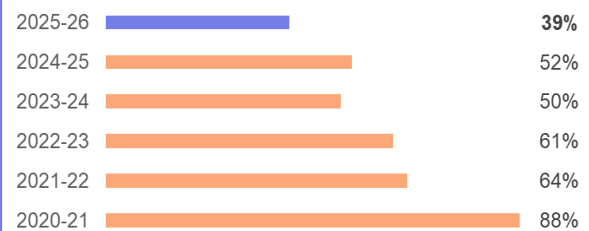
Ave. duration of initial assessments

47 working days 2024-25: - 4 working days



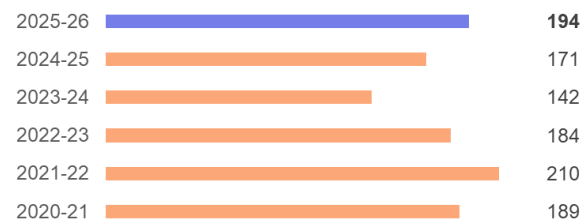
Complaints progressed to full assessment/investigation**

39% (29 out of 74) 2024-25: -13 percentage points



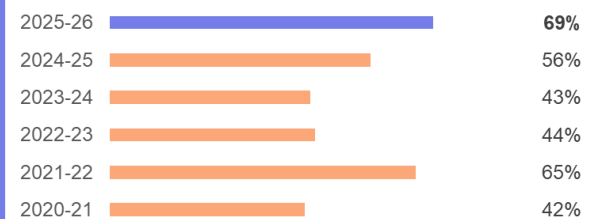
Ave. duration of full assessments

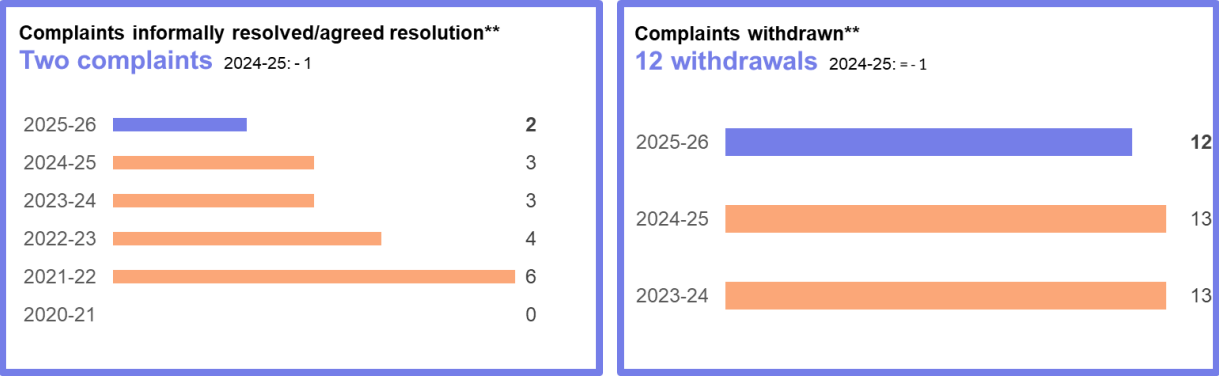
9 months (194 working days) 2024-25: +23 working days



Recommendations to uphold**

69% upheld 2024-25: +13 percentage points





Notes

Some figures relating to previous years have been restated in this report to ensure that the information we publish is as accurate, reliable and transparent as possible. Where figures have been updated, the corrected values are included in this report and should be considered the most accurate representation of performance for that period.

* Figures restated to reflect most up-to-date counting rules. In relation to calls and emails to the helpline, the figure is restated due to an identified recording error by our helpline supplier relating to contacts to the helpline between October 2024 and March 2025.

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

*** The count for 2025–26 is based on annual unique contacts. For previous years, figures were summed from unique contacts in each quarter and therefore may overstate the true number of unique individual contacts (e.g. if the same person contacted the helpline in more than one quarter).

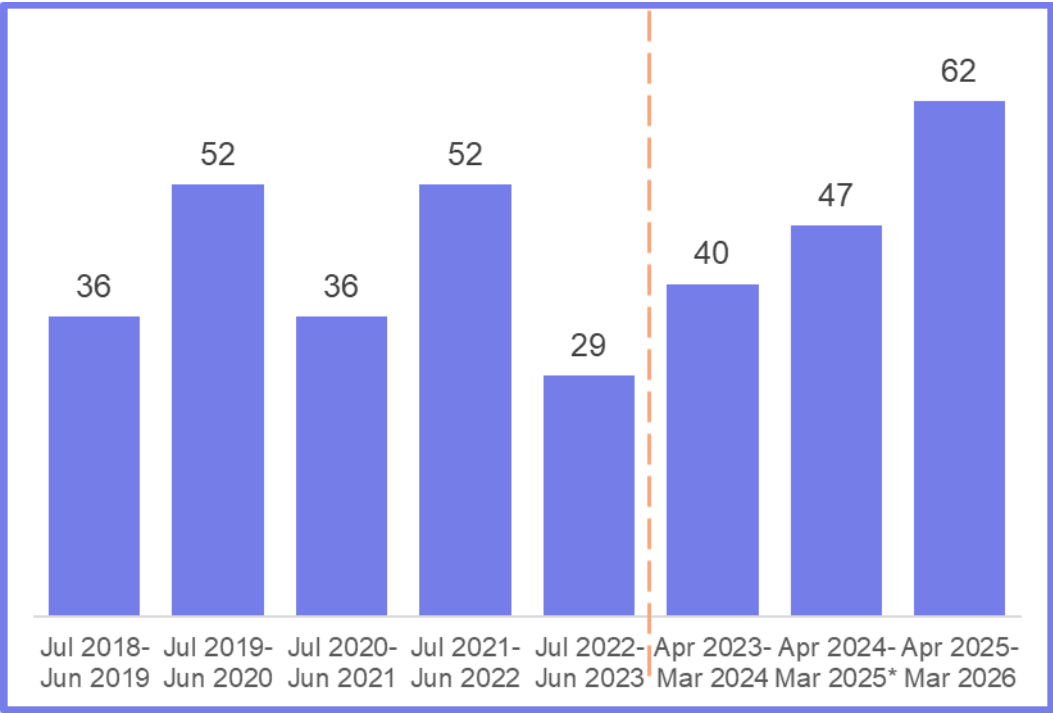
See Annex B – Data tables for further breakdowns.

4 Complaints data

4.1 Disclosures received and cases opened

In the year 2025–26, the ICGS team and the Lords Commissioners for Standards received a total of 62 disclosures, marking a 32% increase (15 more disclosures) compared to the restated total for 2024–25, as illustrated in Figure 1.

Figure 1: Disclosures received 2018–2026



*Figures restated for 2024–25 to reflect the most up-to-date counting rules. The dotted line denotes where reported periods changed from July–June to April–March.

A single disclosure can involve complaints against multiple respondents and complaints against each respondent may be considered separately upon receipt. Similarly, a collective complaint by multiple complainants may be against a single respondent and therefore result in a single case. Not all cases progress to a full investigation.

In 2025–26, a total of 72 complaint cases were opened from the 62 disclosures received, which is 13% more than the 64 cases opened in 2024–25.² Of the 72 cases opened:

- 66 complaints related to bullying and harassment;
- Four complaints related to sexual misconduct;
- Two complaints related to both bullying and harassment and sexual misconduct.

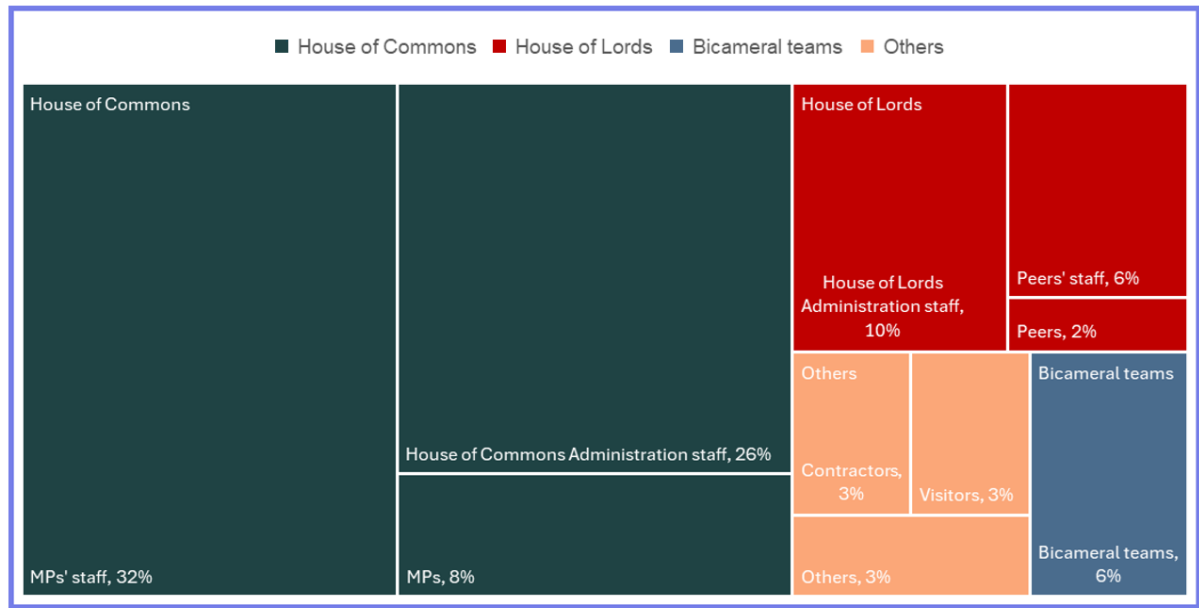
² The figure for 2024–25 cases opened has been to reflect the most up-to-date counting rules.

4.2 Complainant and respondent group data

The ICGS covers all current and former members of the parliamentary community. This includes people employed by or working for the House of Commons, the House of Lords and bicameral teams, MPs and their staff, holders of parliamentary security passes (including those employed by external organisations), as well as Peers and their staff.

As illustrated in Figure 2, most disclosures in 2025–26 came from MPs’ staff, who made 20 disclosures, three more than in 2024–25. Nearly all of these were related to bullying and harassment. The next largest group of complainants was House of Commons Administration staff, who made 16 complaints in 2025–26, three fewer than in 2024–25. Likewise, almost all of these related to bullying and harassment.

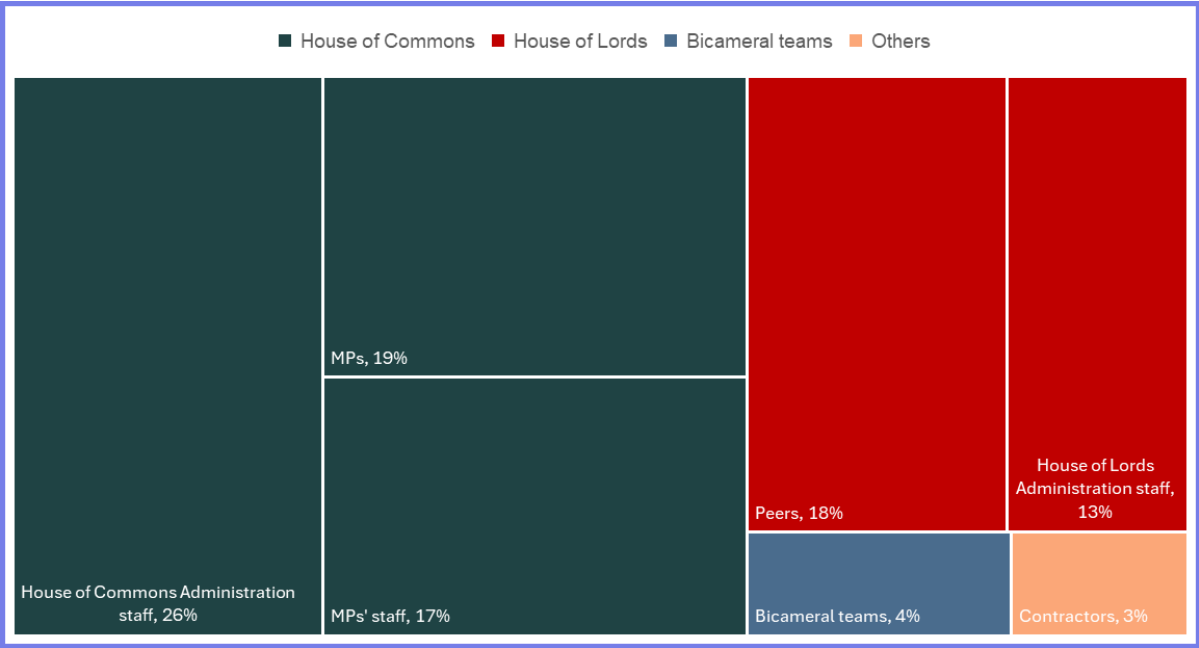
Figure 2: Disclosures received by complainant group in 2025–26



As shown in Figure 3, complaints concerning House of Commons Administration staff made up over a quarter (26%) of all those received in 2025–26, a similar proportion to in the previous year. Complaints concerning MPs and

Peers made up 19% and 18% respectively of the total for 2025–26. Again, these are similar proportions to the previous year.

Figure 3: Complaints by respondent group in 2025–26



5 Performance analysis

In this section we outline our key achievements and performance for the period 1 April 2025 to 31 March 2026.

Our work in 2025–26

Over the course of the year, the ICGS team has undergone a period of substantial development, focused on strengthening governance, improving the experience of service users, and enhancing operational resilience, alongside implementing recommendations from the independent review of the ICGS by Paul Kernaghan CBE QPM, published in May 2024.

Since the publication of Paul Kernaghan’s review, substantial progress has been made in implementing its recommendations. At the end of 2025–26, only two out of 26 recommendations remain outstanding. 24 recommendations have been completed, are being delivered by the ICGS team and Scheme partners as part of regular operations, or are being put into operation by the relevant responsible team within Parliament.

Of the remaining two recommendations currently in progress, one relates to establishing a process for political parties to signpost complainants to the Scheme where the complaint may fall within the scope of the ICGS. This work is being taken forward with the House of Commons Modernisation Committee.

The other recommendation in progress seeks to change who the decision-making body is when a complaint is raised about someone who is contracted by Parliament. Paul Kernaghan recommended that in these cases, the decision-making body should be the parliamentary contracting party. We are working with the Parliamentary Commercial Department and the Office of Speaker’s Counsel on draft guidance to implement this.

We were pleased that in June 2025, the House of Commons agreed to the establishment of an ICGS Assurance Board and agreed a new Policy

Framework, marking the final stage of governance approvals for these changes. The introduction of a permanent, formal governance body for the ICGS, with a remit to conduct assurance of the Scheme on behalf of the parliamentary community, is a significant step in strengthening the oversight and accountability of the Scheme. It also means that there are now clear and proportionate governance arrangements for making changes to ICGS Procedures in future, enabling more agile changes to respond to developments and enable continuous improvement. The ICGS Policy Framework consolidated the separate bullying and harassment and sexual misconduct policies into a single, clear framework setting out the policy definitions, parameters and permissions for the Scheme.

Another major Scheme improvement is the introduction of end-to-end support for service users, launched in March 2026. For the first time, service users now have a single, consistent point of contact for support and engagement from the moment they make a complaint through to the final outcome. This continuity of engagement is intended to strengthen trust, reduce stress, and improve the overall experience for those navigating what can be a complex process.

The other significant change arising from the Kernaghan Review was a revised initial assessment process, starting on 1 October 2025, which we report on further below in section 5.2.

During the autumn of 2025, a new ICGS Director and senior leadership team were successfully embedded. The capacity of the team was further strengthened through two Investigation Support Officers (ISOs) who started in post in June 2025. Our ISOs have significant professional knowledge and experience of evidence collection and investigative interviews. They contribute to robust quality assurance of evidence collected in investigations, ensuring the quality of investigative interviews, as well as improving efficiency and timeliness by undertaking routine investigative tasks without encroaching on investigative decision-making, which remains the responsibility of the independent investigator.

In this reporting year, we also undertook significant work on policy, guidance, and standards. New ICGS Procedures were agreed and published following approval of the ICGS Policy Framework, and updated in October 2025 to reflect the new initial assessment process. We also undertook extensive work to revise our published user guidance to reflect the changes introduced by the Policy Framework. Revised Service User Standards were published and implemented to ensure clear expectations and enhance accountability and engagement for all those using the Scheme. We also created new guidance for Members of Parliament when they are acting as a decision-making body, and guidance for decision-making bodies to support parties and manage risks where there is an ongoing working relationship during an investigation.

We reported in our 2024–25 Annual Report that all ICGS case managers are now required to complete the Advanced Professional Certificate in Investigative Practice (APCIP), which is widely recognised as the leading qualification for professionals in investigative roles. All case managers had completed this training by the end of 2025–26.

In September 2025, the ICGS team initiated a complex procurement exercise to bring in a new pool of independent investigators within a multi-year framework contract. This pool is expected to be operational at the start of 2027. A pilot transcription service has also been made permanent, which has improved the efficiency of case management. In addition, we ran a “keep in touch” day in September 2025 to brief investigators on changes to the Scheme and enable the sharing of best practice.

Taken together, these achievements represent a significant step forward for the Scheme. They were delivered against a challenging backdrop of increased case volumes and complexity, demonstrating our continued commitment to high standards and continuous improvement.

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

The ICGS Helpline

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

During 2025–26, the Helpline saw a 25% increase in demand compared to 2024–25, receiving 558 calls and emails from 287 individuals.³

Of the 137 contacts that fell within the ICGS's remit this year, most were from people wishing to discuss personal experiences (65%) and those who were seeking advice or information (23%).

The Helpline also offers an Independent Sexual Misconduct Advisor (ISMA) to all callers reporting sexual misconduct. ISMAs are specially trained to provide support throughout ICGS investigations. If a complaint is made to the police, the ISMA also assists through the criminal justice process, including court visits and trial procedures. In 2025–26, three service users received dedicated ISMA support.

³ For the years covering 2020 to 2024–25, figures were summed from unique contacts in each quarter and therefore may overstate the true number of unique individual contacts (e.g. if the same person contacted the helpline in more than one quarter).

Wellbeing support we provide

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

During 2025–26, our Engagement Manager had contact with 133 individuals on more than 1120 occasions.

5.2 Delivering independent, high quality and timely assessments and investigations

Initial and preliminary assessments

When a formal complaint about bullying, harassment or sexual misconduct is made to the ICGS team or the Lords Commissioners for Standards, an initial or preliminary assessment is the first step in the process, to determine whether it is eligible to be investigated under the Scheme.⁴

Prior to October 2025, initial assessments conducted by an independent investigator would always involve an interview, drafted allegations, and a full report with analysis. In 2024–25, these detailed initial assessments took an average of ten weeks (51 working days) to complete. This lengthy process occurred even when a case clearly met the criteria for investigation or when it was clearly ineligible, for example, if it was a complaint of bullying or harassment outside the time limit.

Paul Kernaghan stated that the initial assessment had become “less of an eligibility check” and had become “an overly complicated process”. Following extensive engagement with Scheme partners and stakeholders, we launched the new initial assessment process on 1 October 2025.⁵

Since October 2025, the ICGS team now leads initial assessments and decides on any preliminary enquiries required. An independent investigator will interview the complainant only if required. This greater flexibility in how information is gathered means the process is more tailored to the specific circumstances of each case. The ICGS team makes a recommendation to the independent investigator about whether the complaint is eligible to be investigated, but the

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

⁵ These changes do not affect the preliminary assessments undertaken by the Lords Commissioners for Standards.

investigator makes the final decision and communicates this in an outcome letter. The new process also allows the ICGS team and investigator to decide if it is better to decide at full assessment stage whether a complaint, or part of it, is eligible (for example, where it is necessary to speak to the respondent first).

In 2025–26, independent investigators and the Lords Commissioners for Standards completed 74 initial and preliminary assessments, with 39% (29) progressing to a full assessment/investigation. This is lower than the proportion of initial and preliminary assessments that progressed to a full assessment in 2024–25 (52%, 22 out of 42).

Out of the 74 assessments completed in 2025–26, 14 were preliminary assessments conducted by the Lords Commissioners for Standards. The remaining 60 were initial assessments completed by external independent investigators.

Between 1 April 2025 to 30 September 2025, before the introduction of the new initial assessment process, the average duration of initial assessments was 57 working days. For initial assessments conducted between the introduction of the new process on 1 October 2025 and the end of the reporting year on 31 March 2026, the average duration more than halved, to 24 working days.

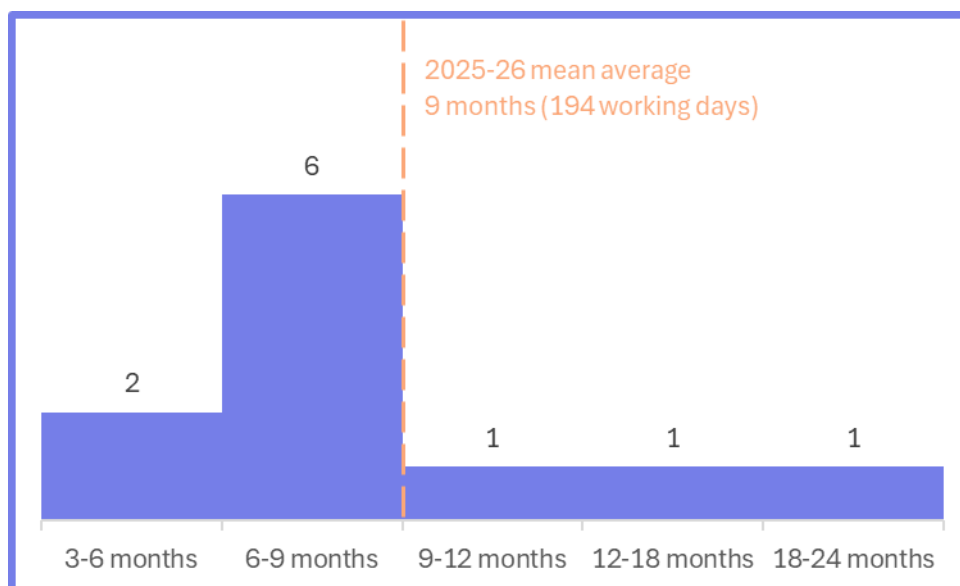
Overall, initial assessments (not conducted by the Lords Commissioners for Standards) took an average of nine and a half weeks (47 working days) to complete in 2025–26. Initial assessments for complaints that did not progress to full investigation took somewhat less time than those that did; 44 working days compared to 53 respectively.

Full assessments completed by independent investigators

In 2025–26, 11 full assessments were completed, taking on average around nine months (194 working days) to complete. This is a month longer than the 11 full assessments completed in 2024–25, which averaged eight months (171 working days) to complete.

The shortest full assessment in 2025–26 took less than four months (81 working days) to complete, while the longest took just under 20 months (424 working days). As shown in Figure 4, eight out of the 11 full assessments were completed in nine months or less.

Figure 4: Duration of full assessments completed in 2025–26



Most of these investigations took place under the previous detailed initial assessment process (which is included in the average duration). We have reported previously that a number of factors can affect the length of investigations including: the complexity of the case; whether the case involved a course of behaviour over time (which often includes multiple specific incidents); the availability and responsiveness of parties; confidentiality breaches; and wellbeing issues. We have planned further work to identify with greater rigour and precision the factors that affect the length of investigations and how we can report on these.

In 2025–26, a significant factor in the time taken to complete an investigation was the respondent group. Four of the 11 investigations completed involved complaints against MPs. These investigations took an average of 13 months

(281 working days) to complete (including the initial assessment time), which is higher than the average of nine months taken to investigate MPs in 2024–25. By comparison, investigations into other respondents took seven months on average.

Investigator recommendations following investigation

Independent investigators recommended upholding the complaint in around two thirds (64%) of the 11 full assessments completed in 2025–26; this compares to 36% in 2024–25.

Re-investigations

Where a report is rejected by a decision-making body, the ICGS team may decide that the complaint should be re-investigated (whether in whole or in part). There were no re-investigations in 2025–26.

Investigations into complaints against MPs

The Parliamentary Commissioner for Standards (the Commissioner) is the decision-maker in cases where an MP is the respondent. Once an investigation is concluded, the investigator submits a detailed report to the Commissioner setting out their findings and a recommendation.

In our 2024–25 Annual Report, we reported that a number of full assessment reports had been rejected by the Commissioner in that reporting year and reported on planned work to understand and address the underlying issues as a priority.⁶ Following discussions with the Commissioner and the ICGS Assurance Board, “case conferences” were introduced to allow the Commissioner an opportunity to discuss the case with the independent investigator before the investigation is concluded, to ensure that the Commissioner has the information

⁶ Under the ICGS policies and procedures which operated for complaints received before 14 July 2025, the Commissioner may reject a report where he considers that it contains significant errors or omissions. For cases investigated under the ICGS Policy Framework (those received on or after 14 July 2025), a decision-making body may reject a report “where there are omissions or errors which are of sufficient significance that the decision-making body could not make a fair decision”. Where the Commissioner rejects a report, the investigator may then be asked to gather further evidence or provide clarification.

needed to make a decision.⁷ Not all MP cases will necessarily require a case conference.

Five full assessment reports were sent to the Commissioner for a decision in 2025–26. None of these reports were rejected by the Commissioner.

We were encouraged by recent confirmation of the quality and robustness of ICGS investigations in a case involving an MP respondent which was considered by the Independent Expert Panel in 2025–26 and which was discussed in the Panel’s 2025 Annual Report.⁸

We are also pleased that the Chair of the Independent Expert Panel highlighted in the Panel’s 2025 Annual Report that he has “confidence from the cases that I have seen and the work of the Board that many of the quality issues mentioned in the Review [conducted by Paul Kernaghan in 2024] have been addressed”. We will continue to work with the Independent Expert Panel, the Commissioner, and the ICGS Assurance Board to support a shared understanding of roles in the Scheme and ensuring the right balance is struck between decision-makers having a thorough evidence base to make their decision, and maintaining proportionality and timeliness, given the significant impact on users of the Scheme.

Improving the timeliness of investigations

A clear theme emerging from both our engagement with service users and from our wider conversations with stakeholders across Parliament is the timeliness of our investigations.

There is broad recognition that matters as sensitive and nuanced as those considered by the ICGS cannot and should not be rushed. They require careful exploration, thorough evidence-gathering, and a measured approach to ensure

⁷ This change was introduced as part of the Commissioner’s oversight of MP cases under Standing Order No. 150(2)(f).

⁸ [Independent Expert Panel Annual Report: 2025, p.9–11.](#)

that conclusions and recommendations to decision-makers are credible and grounded in the evidence. This work takes time, and it should. Rigour is essential to fairness.

However, this must be balanced against the very real impact that lengthy investigations have on the people involved. Some describe feeling in limbo and others report effects on their wellbeing. These consequences are not abstract; they are lived, daily realities for many of our service users.

We have planned further work to better understand the timeliness of the different parts of the process, the impact of this, and what further steps we need to address avoidable delays from the point of disclosure through to the final outcome. As we set out earlier in this report, our work to streamline the initial assessment process has already delivered meaningful improvements at the start of the process.

In 2024–25, we reported that investigations into MPs take longer on average than investigations into other respondent groups. As set out earlier, in 2025–26 this trend became more pronounced, with cases involving MPs taking on average six months longer to reach a conclusion than other cases.

Improving the timeliness of cases is a shared responsibility across the Scheme. This does not mean compromising on the credibility or robustness of investigations. But it can only be achieved through sustained collaboration and focus from everyone involved: the ICGS team, independent investigators, and decision-making bodies. To achieve sustainable improvements in timeliness of cases, all partners in the Scheme need to take a balanced and proportionate approach at each stage from investigation to decision-making and the scrutiny of appeals.

[Lords Commissioners for Standards investigations](#)

In 2025–26, the Lords Commissioners for Standards investigated and concluded five complaints made under the ICGS about Members of the House

of Lords and their staff. Four of these complaints were upheld. On average, Lords Commissioners for Standards investigations took just under six months (125 working days) to complete. This is longer than the re-stated figure of 98 working days for 2024–25.⁹

Informally resolved complaints

People do not always want a full investigation and formal outcome for their complaints. Sometimes, they want the person to understand the impact of their actions and for the behaviour to be acknowledged and addressed. In such cases, when both the complainant and respondent agree, the complaint can be resolved through informal resolution, or, in cases investigated by the Lords Commissioners for Standards, agreed resolution.¹⁰

In 2025–26, two complaints were resolved through informal or agreed resolution.

Complaints withdrawn or investigations ceased

A complainant may choose to withdraw their complaint at any point before the report is sent to them and the respondent for the factual accuracy check. In cases investigated by the Lords Commissioners for Standards, complainants may withdraw at any point, but only with the Commissioner's agreement. The Lords Commissioners for Standards may also cease an investigation where they consider it appropriate to do so in the specific circumstance that a Member resigns from the House while under investigation. In 2025–26, a total of 12 complaints were withdrawn or ceased, which is one fewer than in 2024–25. Of these, nine were withdrawn before the initial assessment was completed and

⁹ The average number of working days to complete Lords Commissioners for Standards investigations in 2024–25 has been restated since the publication of the 2024–25 Annual Report to reflect the most up-to-date counting rules.

¹⁰ House of Lords Enforcement Procedure (bullying, harassment and sexual misconduct) paragraph 31: "At any time during an investigation, the Commissioner may seek to reach an agreed resolution between the complainant and the member under investigation. This is at the Commissioner's discretion and may only be reached with the agreement of both the complainant and member."

three were withdrawn or ceased during the full assessment (investigation) stage.

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

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

'Behaviour Code: Why it matters' seminars

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

Between 1 April 2025 and 31 March 2026, a total of 793 members of the parliamentary community attended 'Behaviour Code: Why it matters' seminars.

In response to recommendations from Paul Kernaghan's review, we also rolled out seminars aimed at key contractor personnel to ensure that they understand the behavioural expectations set by Parliament's Behaviour Code and are aware of the support options available to them. All contractors who attend the seminar are also encouraged to share key messages and learning with teams in their employing organisations.

Accessibility is a vital consideration for participation in the seminars, and we have taken steps during this reporting period to consider adaptations that can be made to ensure it remains accessible for attendees that may require reasonable adjustments. These changes include redesigning the session using more visually engaging materials, developing bespoke case studies and take-away guides.

The feedback from attendees of the ‘Behaviour Code: Why it matters’ seminars is consistently positive and offers valuable insights into the seminars’ effectiveness and impact.

Three-quarters of attendees provided feedback, and of those:

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

Raising awareness of the ICGS

We deliver a continuous outreach programme across Parliament to ensure that awareness and understanding of the ICGS remains high across the parliamentary community. It is important that everyone who may wish to use the service is clear on how to do so and the support available. Our regular engagement with all groups across Parliament allows us to maintain trust and confidence in the Scheme.

During this reporting period, we have engaged with over 3,000 individuals through a total of 44 departmental and team meetings, network sessions, staff town halls, staff inductions and articles about the ICGS and Parliament’s Behaviour Code in department and team newsletters, including a new newsletter aimed exclusively at Lords Members’ staff. We regularly distribute ICGS literature across the parliamentary estate to ensure that colleagues with limited digital access can easily obtain information.

We have also co-delivered sessions with senior leaders across both Houses on leadership and the Behaviour Code to support the sharing of important messages about behavioural expectations, support and redress by senior colleagues.

Working with others to improve Parliament's working culture

To foster cultural change in Parliament, the ICGS collaborates with various stakeholders to ensure Parliament is a workplace where everyone feels safe and valued. By analysing our cases, we gain insights into patterns, trends, and relationships in the complaints we investigate. We share these findings with other teams to inform broader cultural transformation initiatives and support ongoing cultural change within Parliament.

A review of nine full assessments completed over the last reporting year revealed the following themes.

Cases came from a range of contexts, including in working relationships and work-related social or hybrid environments. Some related to isolated incidents, and others to issues over a period of time. Last year, we reported on themes including power imbalances and complaints arising from management action (for example, disciplinary proceedings involving the complainant or the escalation of performance-related concerns).

Workplace conflict and early intervention

Across many cases reviewed for 2025–26, managers or internal teams were aware of concerns before formal ICGS complaints were submitted.

Where there were management responses to these concerns, these were often delayed or fragmented. Where informal interventions took place, there was often a perception of unclear communication and a lack of monitoring or follow-up. In many cases this created a perception of inaction and contributed to escalation.

Where early issues were not effectively addressed, conflict frequently became prolonged and entrenched. Several cases demonstrated ongoing relationship breakdowns characterised by strained communication, disengagement by managers, or avoidance behaviours.

Ineffective implementation of informal resolution

Informal routes such as mediation or informal interventions had often been used before an ICGS complaint was made but were frequently described as ineffective in practice. This reflected limitations in how these approaches were implemented. Common issues included perceptions of lack of follow-up, unclear accountability for agreed actions, insufficient monitoring, and limited clarity about roles and expectations.

Parties consequently often lacked confidence that informal resolution would lead to meaningful or sustained change.

Impact of unresolved conflict on wellbeing and teams

The human impact of unresolved conflict was evident across several cases. Wellbeing concerns included stress-related sickness absence for both complainants and respondents as well as more serious wellbeing concerns.

The effects of prolonged conflict frequently extended beyond the immediate parties, with wider offices or teams aware of ongoing tensions.

Annex A: Financial information

The figures below are the total spend in each of the financial years 2024–25 and 2025–26. They include costs for external services (such as the Helpline, independent investigators, transcription service, and Behaviour Code Training) as well as staffing costs:

The total budget for the ICGS for the financial year 2024–25 (April 2024 to March 2025) was £2,005,330. The actual spend for the year was £1,993,866.

The ICGS had a total budget of £2,114,145 for the financial year 2025–26 (April 2025 to March 2026). The actual spend for the year was £2,043,583.

Annex B: Data tables

Table 1: Calls to the ICGS Helpline

Measure	2024–25	2025–26
Number of calls and emails to the Helpline	445	558
Number of individuals contacting the Helpline*	269	287
Within ICGS remit	154	137
Reason: seeking advice (info only)	20%	23%
Reason: individual (own experience)	75%	65%
Reason: manager (supporting other)	0%	3%
Reason: colleague (supporting other)	2%	7%
Reason: respondent	3%	1%

*For 2024–25, figures were summed from unique contacts in each quarter and therefore may overstate the true number of unique individual contacts (e.g. if the same person contacted the helpline in more than one quarter).

Table 2: Disclosures received, cases opened, and initial/preliminary assessments¹¹

Measure	2024–25			2025–26			
	B&H	SM	Total	B&H	SM	Both*	Total
Number of disclosures received	43	4	47	56	4	2	62
Number of cases opened	60	4	64	66	4	2	72
Number of initial assessments completed by ICGS team	32	1	33	56	4	0	60
Average number of working days to complete initial assessments	52	25	51	48	43	0	47
Number of preliminary assessments completed by Lords Commissioners for Standards	9	0	9	10	2	2	14
Number of complaints progressed to investigation following initial/preliminary assessment	21	1	22	22	5	2	29
Number of complaints determined out of scope following initial/preliminary assessment	20	0	20	44	1	0	45
Number of complaints withdrawn/ceased at initial assessment stage	9	0	9	8	1	0	9

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

*In 2025–26, ICGS and LCS began to include the category of 'Both' for complaints that related to both bullying and harassment and sexual misconduct.

¹¹ For disclosures made to the Lords Commissioners for Standards about Members of the House of Lords or their staff, the Commissioner will conduct a preliminary assessment of the complaint, to determine whether the complaint falls within their remit and whether there is *prima facie* evidence of a breach of the Code. If it passes this assessment, the Commissioner will launch an investigation. The Lords Code of Conduct uses the same definitions of bullying, harassment and sexual misconduct as the ICGS.

Table 3: Full assessments/investigations

Measure	2024–25			2025–26			
	B&H	SM	Total	B&H	SM	Both*	Total
Number of full assessments/investigations started**	18	1	19	18	5	1	24
Number of ICGS team full assessments completed	9	2	11	9	2	0	11
Average number of working days to complete ICGS team full assessments	180	129	171	202	158	0	194
Number of ICGS team complaints upheld (investigator recommendation)	3	1	4	6	1	0	7
Number of ICGS team re-investigations started	0	0	0	0	0	0	0
Number of ICGS team re-investigations completed	1	1	2	0	0	0	0
Average number of working days to complete ICGS team reinvestigations	282	143	213	-	-	-	-
Number of ICGS team re-investigated complaints upheld (investigator recommendation)	0	1	1	-	-	-	-
Number of Lords Commissioners for Standards investigations concluded with findings	4	0	4	1	1	1	3
Average number of working days to conclude Lords Commissioners for Standards investigations	98	-	98	200	105	71	125
Number of complaints concluded by Lords Commissioners for Standards investigations	7	0	7	2	1	2	5
Number of complaints upheld by Lords Commissioners for Standards	6	-	6	2	0	2	4
Number of complaints informally resolved/concluded by agreed resolution	3	0	3	2	0	0	2
Number of complaints withdrawn/ceased at full assessment/investigation stage	3	1	4	3	0	0	3

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

*In 2025–26, ICGS and LCS began to include the category of 'Both' for complaints that related to both bullying and harassment and sexual misconduct.

**Figure for 2024–25 has been restated since the publication of the 2024–25 Annual Report to reflect the most up-to-date counting rules.