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## Creating the Right Culture: Inquiry into the Review of the Code of Conduct for Assembly Members Consultation Response by Welsh Women's Aid

Closing date: 31.01.18

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<b>These are the views of:</b>	<i>Welsh Women's Aid (Third Sector) - the national charity in Wales working to end domestic abuse and all forms of violence against women.</i>

### About Welsh Women's Aid

Welsh Women's Aid is the umbrella membership organisation in Wales that supports and provides national representation for 27 independent third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales (our membership of specialist services).<sup>1</sup> These services deliver life-saving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is to prevent domestic abuse and all forms of violence against women and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales; we provide advice, consultancy, support and training to deliver policy and service improvements across government, public, private and third sector services and in communities, for the benefit of survivors. This includes advising and supporting commissioners and strategic leads in their development of VAWDASV needs assessments and strategic plans, promoting evidence for innovative new service models, and supporting research into the prevention of abuse.

Some of the many services we deliver for members include facilitating the involvement of member services in relevant policy, legislative and strategy developments and encouraging co-production in service development; providing advice and information on the development and delivery of promising practice in the sector; providing support with policy and practice matters, and regional and national data analysis reports to support local needs assessments, strategy and commissioning developments.

We also deliver direct services including the Welsh Government funded Live Fear Free Helpline; a National Training Service; the national Children Matter programme of work which, for example, supports local services to help children and young people affected by abuse and to deliver preventative Safety, Trust and Respect (STAR) programmes across Wales, and refuge and advocacy

<sup>1</sup> Our membership of 27 third sector VAWDASV specialist services in Wales, with whom we have national partnership agreements to ensure our work is coordinated and integrated: *Aberconwy DAS, Atal y Fro, Bangor and District Women's Aid, Bawso, Clwyd Alyn Housing Association (CAHA) Women's Aid, Carmarthen Domestic Abuse Service, Calan DVS, Cardiff Women's Aid, Cyfannol Women's Aid, Domestic Abuse Safety Unit (DASU), Glyndwr Women's Aid, Gorwel (Grwp Cynefin), Hafan Cymru, Llamau, Montgomeryshire Family Crisis Centre, New Pathways, Newport Women's Aid, North Denbighshire Domestic Abuse Service, Port Talbot & Afan Women's Aid, RCT Women's Aid, Rape and Sexual Abuse Support Centre (North Wales), Safer Merthyr Tydfil, Safer Wales (including Dyn Project), Stepping Stones, Swansea Women's Aid, Threshold (formerly Llanelli Women's Aid), West Wales Domestic Abuse Service.*

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services in Colwyn Bay and Wrexham. We are piloting the Survivors Empowering and Educating Services (SEEds) project, which is empowering survivors of violence and abuse to collectively influence and inform services and commissioning frameworks, and help change public and community attitudes. We also deliver the Wales National Quality Service Standards, a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found here: <http://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>)

### Welsh Women's Aid's response

As the umbrella organisation for violence against women, domestic abuse and sexual violence services in Wales, our response is based on consultation internally and with our membership of specialist services and reflects experiences across all regions. Additionally, we consult with survivors of abuse through Welsh Women's Aid's SEEds project (Survivors Empowering and Educating Services).

Welsh Women's Aid's response relates predominantly to matters of processes and complaints around all forms of violence against women, domestic abuse and sexual violence, including sexual harassment and intimidation at work. We would like to stress that sexual harassment is a form of violence against women and should be treated with the utmost seriousness. The Welsh Government National Strategy 2016-2021<sup>2</sup> defines violence against women and girls in accordance with the UN Declaration definition of violence against women<sup>3</sup>:

- **All acts of gender-based violence** that result in, or are likely to result in, physical, sexual, psychological, or economic harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life.
- This encompasses, but is not limited to:
  - (a) Physical, sexual and psychological violence occurring in the family, including battering, sexual abuse of female children in the household, dowry-related violence, marital rape, female genital mutilation and other traditional practices harmful to women, non-spousal violence and violence related to exploitation;
  - (b) Physical, sexual and psychological violence occurring within the general community, including rape, sexual abuse, **sexual harassment and intimidation at work**, in educational institutions and elsewhere, trafficking in women and forced prostitution;
  - (c) Physical, sexual and psychological violence perpetrated or condoned by the State, wherever it occurs.

<sup>2</sup> Welsh Government, 'National Strategy on Violence against Women, Domestic Abuse and Sexual Violence – 2016-2021', Welsh Government, 2016.

<sup>3</sup> <http://www.un.org/documents/ga/res/48/a48r104.htm>.



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## Question 1:

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

1.1 When Welsh Women's Aid asked members and survivors whether they felt comfortable making a complaint about an Assembly Member (AM) or somebody who works on the Assembly estate, responses were varied. While some respondents said that they would feel comfortable (although they did not have much contact with AMs), others said they would not. For example:

*"No. They didn't investigate the recent complaints made [regarding the late Carl Sargeant] so I wouldn't have confidence that they would take complaints seriously." specialist service*

1.2 The third sector in Wales place significant importance on effective engagement with, and cross-party support from, local and regional Assembly Members. This can be in the form of raising issues in relation to violence against women, domestic abuse and sexual violence as constituents, as advocates for survivors of abuse, or by holding the Welsh Government to account on strategy or legislative delivery. However, many of these organisations are also funded, in part, by the Welsh Government either directly or indirectly. Therefore, concerns have been raised with us about the deliberate or unintended consequences of challenging people in power or close to those in power. It is possible that an individual may feel that by making a formal complaint, they could be harming the position of their organisation and the survivors who they work with every day to protect.

1.3 Victim blaming is another factor to consider. Even if anonymity is protected, a chance of a real or perceived backlash against survivors of abuse may dissuade people from wanting to report any complaints about an Assembly Member or someone who works on the Assembly estate. While names are kept confidential, consequences are not and media coverage of AMs can lead to media sources and the wider public criticising individual complainants despite not having access to the facts of the matter. This was unfortunately the case for women associated with the recent complaints regarding the late Carl Sargeant, and although they remained anonymous, there was evidence of victim blaming in the public domain which might deter women from pursuing complaints or from coming forward in future. It is of course also possible that leaked information could lead to direct online and media attention, including online harassment, trolling and inflicting physical and psychological harm to those disclosing any complaints.

1.4 It is also worth noting that Assembly employees working closely with an AM, who themselves may have aspirations to build their own political careers, may have concerns that making a complaint could close doors in relation to their future career prospects. The recent scandal of sexual harassment and sexual violence in Westminster shines a light on this often hidden issue. For example, one Labour activist who has waived her right to anonymity has spoken out about how she was raped at a Party event in 2011 by a more senior Party member and was discouraged by an official from reporting the crime because it could damage her career.<sup>4</sup> There are countless other examples of sexual harassment allegations being made against powerful politicians going unreported until recently, and certainly more that will remain hidden.

<sup>4</sup> R. Mason, et al. 'Labour activist says she was raped at party event and told not to report it', *The Guardian*, 1 November 2017, <https://www.theguardian.com/world/2017/oct/31/labour-activist-says-she-was-raped-at-party-event-and-told-not-to-report-it>, (accessed 26 January 2018).



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1.5 The Assembly is constantly under scrutiny and operates in the public eye. Any media coverage around alleged complaints and subsequent action or inaction has a direct bearing on public perception of how complaints are taken forward and the consequences of both making a complaint and being held to account for breaching a code of conduct. If there are proceedings and consequences are perceived as inadequate, it damages public trust in the process and ultimately damages the reputation of the institution.

**Question 2:**

**2. Would you know how to make a complaint about an Assembly Member or somebody who works on the Assembly estate?**

2.1 No, the process appears confused. There seem to be many different and conflicting advice with regards to how to make a complaint about an Assembly Member or other member of Assembly staff. One respondent noted *“Not exactly, although I have looked on the website and it looks very long winded”*. For example, there appears to be at least four different ways of making a complaint against an AM and it is unclear which to use for different scenarios:

1. Complaints about all AMs to the Commissioner for Standards;
2. Complaints about AMs directly to Welsh Government if they were working on behalf of Welsh Government at the time;
3. Making a complaint to the party of AMs (this is obviously not available for those who are independent);
4. Complaint advice via the [DignityandRespect@assembly.wales](mailto:DignityandRespect@assembly.wales) email address, as stated in the Dignity and Respect statement on the National Assembly for Wales’ website.

2.2 The process is in need of simplification to make it as easy as possible to make a complaint, so that all those who would like to do so feel confident in the process, such as a ‘one portal’ system for complaints.

2.4 While Welsh Women’s Aid commends the provision of a confidential helpline for advice is available to internal Assembly staff, in addition to the counselling helpline available for those who are not ready to make complaints, a high standard of this service needs to be met. In practice, the National Assembly for Wales needs to ensure that those who work on the helpline understand sexual harassment – in the wider context of VAWDASV – and signpost survivors to appropriate specialist VAWDASV services and ensure that those operating the helpline have received effective training in this area.

2.5 It is unfortunate that these service or similar services are not available to those who don’t work for the Assembly in some capacity. We would also recommend that the Welsh Government funded *Wales Live Fear Free helpline* is also promoted so that if anyone were seeking to make a complaint in relation to sexual harassment and any other forms of violence against women, domestic abuse or sexual violence, they can access independent, confidential support through the 24 hour service in Wales.



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**Recommendation:**

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- **Ensure that those who currently work on the existing helpline and counselling services for the National Assembly for Wales’ staff have a nuanced understanding of sexual harassment as a form of violence against women and where appropriate, signpost survivors to specialist VAWDASV services.**
- **Individuals should be signposted to the Wales Live Fear Free helpline when their complaint relates to any form of violence against women, domestic abuse or sexual violence – including sexual harassment.**

**Question 3:**

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

3.1 One of our members said:

*“This consultation suggests that others may have encountered barriers and this review is therefore timely and appropriate in order to identify whether the system can be improved. I would want to be able to approach someone to help word the complaint so it complies with the guidelines.”*

3.2 We feel there are a number of barriers to people raising concerns about the inappropriate behaviour of AMs or someone who works on the Assembly estate, some of which are common in high profile and high power workplaces, and others that are exacerbated by the current processes. One respondent to our survey highlighted the *“lack of investigation into the previous complaints made”* as a concern and a barrier to making future complaints or confidence in the system.

3.3 As previously highlighted, another barrier to making a complaint may be the feeling that there may be political consequences for an individual, organisation or sector due to the power of the person who the complaint is about. This could take many forms:

1. prominent issues related to the work of the complainant such as VAWDASV could disappear from the political agenda of Welsh Government, backbencher or opposition AMs;
2. Employees of certain organisations may feel that a complaint could threaten their organisation’s funding or that they could lose job security;
3. the survivor could feel that they would not be believed because of the power of the person involved.

3.4 In addition, a complainant may feel that there is a lack of clarity around the process used, which as previously stated *“appears longwinded”*. There also appears to be a lack of specific information in relation to sexual harassment policies and violence against women related policies within the Assembly. While there is a helpline for internal employees, there is no such support for external people who may wish to make a complaint or receive support. More information in relation to AM’s Code of Conduct would also make it clearer when a breach has occurred. There is currently a distinct





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lack of guidance laid out in relation to how AMs and Assembly staff are expected to behave both internally and externally.

3.5 Welsh Women's Aid does not believe that the one year limitation for making complaints is satisfactory. For matters relating to violence against women, survivors often need considerable time to process their negative experiences and until they feel safe and able to disclose them. Therefore, survivors may not choose to tell anyone of their experiences for some time, and often will disclose for the first time years after the abuse has occurred. We believe that AMs and others who work on the Assembly estate should be held to account by the Assembly for their behaviour for the duration of their service.

3.6 Other issues are unique to the Assembly in that AMs are elected every five years and that currently all complaint proceedings are paused during the election process. While complaints may be re-started if the AM who is complained about is re-elected, for those who are not re-elected the Assembly currently lacks powers to pursue matters further. What makes the Assembly relatively unique is that the said AM may then be re-elected five years later. Welsh Women's Aid would like to see a flag of complaints that have been paused during an election, so that this is pursued if they are re-elected in future.

3.7 It also appears that while an AM has the right to appeal a decision, a complainant does not have the right to appeal if they disagree with the decision. The complainant currently has no ability to end proceedings or appeal a decision that finds that the code of conduct has been breached, but is deemed less serious than the complainant believes to be true. This does not seem proportionate or just and shows an imbalance of rights, for example, between an internal employee and an external complainant or indeed an internal complainant reporting an internal complaint.

3.8 Barriers in terms of equality and accessibility of the process for those with various protected characteristics and those who commonly face barriers to have their voices heard must be considered and addressed. For example, there need to be specific protections against people with protected characteristics outlined in the Equality Act 2010, around age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. In addition, provisions need to be made for those who have language or communication barriers or other additional needs, to ensure that guidance and the process of making a complaint is accessible to everyone, regardless of specific need.

**Recommendation:**

- ***One year limit changed to at least the length of the Assembly and one year prior to re-election, if applicable. In addition, complaint procedures that were dropped due to an AM not being re-elected should stay on file so that if that AM is re-elected in the future, this remains on their record for a period of one year.***
- ***Appropriate policies and procedures are in place and effectively implemented to ensure that there are no barriers to making a complaint for people with protected characteristics, and those with specific language needs etc.***



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#### Question 4:

#### 4. Do you have any suggestions regarding how the complaints procedure can be simplified?

4.1 The language of the documentation only presents an overview and not specific details. Some of our members also perceive the language of the document as unclear – it is full of confusing clauses and jargon, which presents a potential barrier to a complainant reading the document as it is hard to navigate quickly and effectively. The only mention of inter-personal conduct currently refers to AMs and their staff, and even this section is sparse. The documentation does not outline how AMs are expected to behave, for example, around external professionals or constituents.

4.2 Welsh Women's Aid feels that current guidance does not go far enough and therefore we agree that there is a need for the dignity and respect guidance which the committee intends to create – this should include specific sexual harassment and violence against women policies, which make it explicitly clear that the claimant of these unacceptable acts will be treated with appropriate care, support and confidentiality and lay out a clear timeline of procedures and expectations of how the National Assembly for Wales will protect the complainant from any further negative experiences, whether from the accused, the wider organisation or the public. Conduct around interpersonal relationships should also be outlined.

4.3 We recommend that the process should be simplified to allow anyone making a complaint to go through one portal, where the complaint can then be directed to the correct channel. For example, all complaints against Party members, AMs, or those working on behalf of the Welsh Government could be directed by the Commissioner for Standards office.

4.4 The current document would benefit from being written in an easy to read format, accompanied by clear guidelines, procedures and timescales, with bullet points outlining whom to make a complaint to. In addition, a designated Complaints Officer may be of benefit.

#### Recommendation:

- ***The new dignity and respect policy explicitly and thoroughly outlines a detailed violence against women policy – including sexual harassment – and includes clear guidance of the code of conduct around interpersonal relationships between colleagues in the National Assembly for Wales and with employees of the Assembly and external people.***
- **Simplify guidance and process so it is clear who to report complaint to, the timeframe and the support that complainants would receive, preferably into one portal.**

#### a) Is the guidance clear? Is the language used simple to understand?

*“No it is not clear. No the language is not simple to understand.”*

5.1 Overall we feel that the guidance is broad and sparse and does not give guidance regarding specific complaints. Not all responses to this question did find the guidance unclear, though the majority of people found it unhelpful



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5.2 The document gives an overview of the Code of Conduct in line with the seven principles of: Selflessness; Integrity; Objectivity; Accountability, Openness, Honesty and Leadership. It was surprising that Dignity and Respect are not the eighth and ninth principles as they are referred to specifically on the Assembly’s consultation page with regards to this inquiry. We would therefore recommend these are included.

5.3 One respondent commented that:

“The guidance is defined but it is complex and requires lengthy study to understand in order to ensure any complaint is lodged within its requirements.” They continued that they would be concerned about whether their complaint would comply with the guidance, as it appears complicated.

**Recommendation:**

- **Include ‘Dignity’ and ‘Respect’ in the core principles in the Code of Conduct for AMs, alongside the additional seven principles.**

**b) Does the document help you understand who you should contact about different types of complaints?**

6.1 While responses to this question were mixed, the vast majority of respondents did not feel that the document successfully clarified this matter. For example, one person stated:

“No, again it is very long winded, without clear instruction and it doesn’t identify in plain English the different types of complaint.”

6.2 The issue continues to be that even when the guidance does provide the answers, it takes the reader a considerable amount of time to find the correct information. -. One person responded to the question of whether the document helped them to understand who to contact about different types of complaints, saying: “Yes, ultimately” but also highlighted that the system is very complex, requires studying in order to fully understand, and that they would benefit from external help in order to feel assured that they were following the process correctly. This level of scrutiny and external involvement can only be seen as a barrier and is therefore not an acceptable process for an organisation if the ultimate aim is to have a clear and transparent complaints procedure.

**c) If you were a victim of inappropriate behaviour, would you feel confident in using the procedure as it currently stands?**

7.1 The responses to this question were mixed. One person stated that:

“With regard to inappropriate behaviour I would feel more confident if I had an independent organisation to support my complaint. Doing so as a lone member of the public is daunting and would make me feel potentially vulnerable.”

7.2 One person stated:

“No, not after having had a look at it. It seems very confusing and I would worry that my complaint would not be dealt with effectively or efficiently or sent to the right person.”





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7.3 Other respondents noted the fact that they felt previous complaints had not been dealt with well, which means that they would not be confident in using the procedure as it currently stands.

7.4 Another comment was that:

*“As a constituent and member of Welsh society, I don’t see what I would gain from undergoing this process. There’s no suggestion of support for the person complaining or reassurance that they won’t be ostracised in one way or another.”*

7.5 While a small proportion of our respondents stated that they would feel confident in the current procedure, the vast majority did not. This suggests that the current process is not working for everyone and more needs to be done to inspire confidence in the system. This should be done through supporting complainants and simplifying both the guidance and the process so that it is neither onerous nor confusing for the person making the complaint. All perceived barriers should be removed wherever possible, so that public confidence in the Assembly and our AMs can be strengthened and maintained. It is vital that the public can hold democratically elected politicians to account for their behaviour, and any breaches of their Code of Conduct that the electorate and wider society perceive to be in question should be addressed in as fair and transparent way as possible.

**Further Comments:**

8.1 Welsh Women’s Aid welcomes the Standards of Conduct Committee’s commitment to develop a Dignity and Respect policy which spells out that inappropriate behaviour has no place in the National Assembly for Wales. This policy document is long overdue and will help to ensure that the National Assembly for Wales and all of its employees are able to understand both what is expected in terms of their conduct in relation to dignity and respect, including around areas of violence against women, including domestic abuse, sexual violence and work-based intimidation, bullying, harassment, including sexual harassment. Such a document would need to lay out appropriate guidelines that protects survivors of all forms of violence against women and ensure that those who have suffered actions that are detrimental to their sense of dignity and respect feel able to come forward.

**Summary of Welsh Women’s Aid recommendations:**

- **Individuals should be signposted to the Wales Live Fear Free helpline when their complaint relates to any form of violence against women, domestic abuse or sexual violence - including sexual harassment.**
- **The new dignity and respect policy explicitly and thoroughly outlines a detailed violence against women policy – including sexual harassment – and includes clear guidance of the code of conduct around interpersonal relationships between colleagues in the National Assembly for Wales and with employees of the Assembly and external people.**
- **Include ‘Dignity’ and ‘Respect’ in the core principles in the Code of Conduct for AMs, alongside the additional seven principles.**
- **Simplify guidance and process so it is clear who to report complaint to, the timeframe and the support that complainants would receive, preferably into one portal.**
- **Appropriate policies and procedures are in place and effectively implemented to ensure that there are no barriers to making a complaint for people with protected characteristics, and those with specific language needs etc.**



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- **Ensure that those who currently work on the existing helpline and counselling services for the National Assembly for Wales' staff have a nuanced understanding of sexual harassment as a form of violence against women and where appropriate, signpost survivors to specialist VAWDASV services.**
- **One year limit changed to at least the length of the Assembly and one year prior to re-election, if applicable. In addition, complaint procedures that were dropped due to an AM not being re-elected should stay on file so that if that AM is re-elected in the future, this remains on their record for a period of one year.**

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Welsh Women's Aid would like to thank the Standards of Conduct Committee of the National Assembly for Wales for the opportunity to comment on this important issue. Welsh Women's Aid is also available to provide further written and oral evidence around this issue if required.

Any comments or questions regarding our response can be directed to:  
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