

Page number	Recommendation number	Recommendation	NEC: 29 November 2022	Updated action from NEC: 28 March 2023
Reform of the Party's disciplinary processes				
116	3	Complaints should be appropriately logged, and electronic records updated at each stage of the complaint.	The first part of this recommendation is complete and the second part will be resolved by the new Labour People System which allows us to dynamically manage records for members and supporters. The system began operation in July this year, and will continue to be rolled-out throughout 2023. In the meantime, the Party's Governance and Legal Unit (GLU) have appropriate systems in place to keep accurate records of decisions taken in the intervening period.	Earlier this year a People Management system (for membership) and a People Case Management System (PCMS) were introduced, which significantly improve the Party's ability to respond to and manage complaints effectively. The system delivers further efficiencies for managing the complaints process including logging and recording data recommended by Forde. The new system goes further than requested by Forde in delivering an effective process. Complete
116	4	Complainants and respondents should be given full and up to date information about the progress of the complaint and the information required at each stage.	In line with our Complaints Policy, we provide updates to first party complainants only. We consider this continues to be a proportionate and appropriate (in terms of compliance with our confidentiality obligations) way forward. The new Labour People system will also assist us in continuing to ensure that updates are provided to first party complainants.	As above. Complete
117	9	The number of complaints received and concluded, and details of the progress of all such matters, should be fully auditable.	Complaints and Disciplinary Sub-Committee are published, shortly thereafter, on the Party's website (for all to see). These can be found on www.labour.org.uk/complaints	
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1. Structural and staffing				
118	1.6	There should be no other NEC process beyond the Complaints and Discipline Panel hearing. Appeals should go either to the NCC or in discrimination cases to the new IRB.	In terms of appeals, this already happens (as laid out in the Rule Book). Complete	
118	1.8	No member of Party staff (outside of the Directorate), LOTO staff or other parliamentary staff should be involved in the process (other than as a complainant, witness or respondent).	This is already the case, to the extent that such individual is not involved in the case (as a complainant, respondent or witness). The Protocol governing the appropriate interaction with the leadership of the Labour Party in the Labour Party's disciplinary and complaints processes - which was implemented as part of the Party's Action Plan response to the EHRC report - helps bring additional clarity to this recommendation. Complete	

118	1.1	The Directorate should otherwise consist of caseworkers, case managers, and case examiners.	In effect, the Party's Governance and Legal Unit (GLU) already does this in relation to its functions as they pertain to complaints and disciplinary matters. Complete	
118	1.12	Caseworkers should be responsible for a pre-determined case load which should be capable of audit at all stages of the complaint.	In effect, GLU already does this in relation to its functions as they pertain to complaints and disciplinary matters. Complete	
118	1.13	Case managers should be responsible for the management of the Directorate's caseload and work allocation, and should also present serious, high-profile or otherwise sensitive cases to a Complaints and Discipline Panel.	In relation to the first part of this recommendation, GLU already does this (in relation to its functions as they pertain to complaints and disciplinary matters). However, we do not propose the separate Directorate (and resulting organisational changes), for the aforementioned reasons.	After consideration, it was considered that much of this recommendation was covered by the processes now in place and is, therefore, complete. Complete
119	1.16	There should be an ability to learn from errors with internal circulation of learning points and best practice on a monthly basis.	This is already a practice underway, with weekly case management sessions between the complaints and disciplinary team members. However, we will not be complacent on this.	Complete

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2. Process				
120	2.1	The Party should draft and publish indicative sanctions guidance with a view to ensuring consistency of outcomes when considering complaints. This guidance should deal with common disciplinary matters including proportionality, and aggravating and mitigating circumstances (repetitive breaches of conduct rules and past disciplinary history might be regarded as aggravating circumstances, and a long and distinguished service for the Party a mitigating circumstance). This Guidance should be available to the membership.	This work is already underway. The Party also publishes its Complaints Policy and Complaint Handling Handbook on its website, which is publicly available. This practice began in 2021, as part of the Party's overall response to the EHRC's report. These reports are published regularly on the Complaints page and covers all complaints and disciplinary outcomes (and not just those related to antisemitism). Complete	
120	2.2	When a complaint is made it should be electronically logged, briefly summarised and categorised.	webpage, it is automatically allocated with a reference number. The complainant then receives a summary of the complaint they have submitted (using their own words), along with a complaint reference number.	

120	2.5	<p>This letter should come from a caseworker (identifiable by case reference) who should, where possible, remain the caseworker until the complaint is resolved.</p>	<p>Where a case is allocated to an Investigations and Governance Officer, they will continue with the case through to NEC/NCC/ICB adjudication (barring annual leave, extended absence, etc.). However, we do not propose to include the individual IGO's name in correspondence with a complainant or respondent, due to the risk of harassment that staff member may then become subject to (as has been the case in recent history). Continuing this approach is a proportional and balanced approach between staff safety and welfare on the one hand, and the rights of a complainant/respondent going through our disciplinary process.</p> <p>Complete</p>	
120	2.6	<p>The respondent should also be provided with a copy of the Rules governing an investigation and other relevant materials concerning the Party's disciplinary processes, all of which should be available to the membership. They should include examples of the sort of conduct that might bring the Party into disrepute – for example, criminal convictions, police investigations or charges, allegations of improper conduct in respect to protected characteristics.</p>	<p>This is already publicly available on our website.</p> <p>Complete</p>	
<p>3. Right of appeal</p>				

123	3.1	<p>2021, which make provision for various reforms, including the establishment of an IRB in cases involving accusations of discrimination. The Party will need to be vigilant that those new procedures, when combined with the further reforms we recommend in this report, deliver a system which, as far as is practicable, enshrines the core principles of Article 6 of the European Convention on Human Rights, including in particular:</p> <ul style="list-style-type: none"> • an entitlement to a fair and public hearing within a reasonable time by an impartial panel; • a presumption of innocence until proved otherwise according to law; • minimum rights for any party facing a complaint, including the right: <ul style="list-style-type: none"> - to be informed promptly, in a language which the person understands, and in detail, of the nature and cause of the complaint made against that person; - to have adequate time and facilities for the preparation of any response to the complaint; - to mount a defence to the complaint in person or through legal assistance freely chosen; and - to examine or to have examined witnesses whose evidence supports the complaint or complainant and to obtain the attendance and examination of witnesses on behalf of the person facing complaint under the same conditions as witnesses against that person. "We note the new 	<p>This will be considered as part of the interim review of the new independent complaints process which will report in early 2023.</p>	<p>since April 2022. The IRB, which only contracts external professional lawyers (with no connection with the Party), has so far reviewed 143 decisions (as of 14 March 2023), and whilst the majority of cases were verified, 5 were vetoed and remitted to a fresh NEC panel for consideration. We believe this illustrates the independence of the process. The Independent Complaints Board (ICB), which consists of 12 members including external lawyers, other professionals (not affiliated to the Labour Party) and Labour Party lay members, either determine cases referred to it, hear complaints person and/or hear appeals against certain NEC decisions. As of the same date, they had heard 8 cases (though this has since increased) which have resulted in: 3 expulsions; 1 x 18-months suspension; 1 x 9-months suspension; 2 formal warnings; and 1 case not upheld.</p> <p>The procedures developed to guide the IRB and ICB are very detailed and enshrine the principles required by some of the Forde Report's recommendations, including using plain language, impartial panels and fair hearings.</p>	Complete
4. Systems					
123	4.3	All complainants and respondents should provide the Directorate with a postal address and, if available, an email address which would be used for all correspondence regarding the complaint, including formal service of documents.	This is currently the position.		Complete
123	4.4	It should be the responsibility of a complainant or a respondent, as appropriate, to inform the Directorate of any change in this postal or email address.	This is currently the position.		Complete
123	4.5	The Directorate should use recorded service for all postal correspondence.	A financial analysis will need to be conducted (based on current complaints statistics) to see if this is proportional to the cost. The overwhelming number of complainants and respondents engage via email, and we already accommodate those who cannot by accepting correspondence in the post.	Whilst the overwhelming number of complainants and respondents engage by email there are occasions when recorded delivery is required and is reviewed on a case by case basis.	Complete
124	4.8	The Panel should then retire and consider the appropriate sanction, weighing the culpability of the proven conduct, aggravating and mitigating circumstances, proportionality and the Party's indicative sanctions guidance.	In practice, this is already done by the NEC, the National Constitutional Committee (NCC) and/or the Independent Complaints Board (ICB). However, we will consider whether anything else is missing.	After consideration, it was considered that this was fully covered by the processes already in place and is, therefore, complete.	Complete

124	4.9	<p>The Directorate should produce and make publicly available key data sets about the complaints process, to be agreed, but to include, for example:</p> <ul style="list-style-type: none"> • the total number of complaints made in the relevant period (e.g. the current calendar/financial year); • the number of complaints made in that relevant period in each of a number of categories to be agreed including the different forms of racism and discrimination); • the proportion of (i) all complaints and (ii) complaints in the categories identified in accordance with recommendation 4.9(b) above, which (i) have been resolved and (ii) remain outstanding at the date of reporting; and • the average time taken for complaints to reach key stages in the process, including resolution. 	<p>For the aforementioned reasons, we do not consider it appropriate to implement the Directorate. However, we already publish the data presented to the NEC Complaints and Disciplinary Sub-Committee on the Party's website, and we are also considering service levels. If there is further detail and commentary we can provide that assists in this regard, we will consider this further. However this has been included in this category on the basis of the publications already made.</p> <p>Complete</p>	
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Party culture

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Reform of Party culture				
125	7	A senior Shadow Cabinet member should be designated to liaise with HQ about cultural change and oversee the progress made.	Anneliese Dodds as Party Chair is a member of the Shadow Cabinet and responsible for Party culture.	
			Complete	
1. The Party-wide consultation to identify shared values that we recommend should include:				
125	1.1	an open and facilitated discussion between HQ, LOTO, the regional offices, officers and elected members; and	The shared values of staff are positively reinforced at regular all staff meetings, with facilitated discussions between all of the departments mentioned in 1.1.	
			Complete	

Social media policy

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Reform of the Party's disciplinary processes				
127	1	We recognise that social media platforms provide valuable opportunities to participate in interactive discussions and share information. However, the prominence of the SMT WhatsApp messages in the allegations made in the Leaked Report illustrates how the use of social media platforms poses wide-ranging risks to the Party, its staff and its members.	This is self-evident and understood.	
			Complete	

Recruitment and Management of Staff			
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131	1	The Party must radically reform its approach to people management – the recruitment of its staff and their development, both professionally and personally – if it is to transform itself into the modern, highly skilled and diverse organisation capable of fulfilling its democratic duty to the voters of this country.	The Party has made very significant improvements in this area, particular with regard to recruitment, training and diversity and inclusion. Action plans are now in place including a D&I action plan, the Operation Change Training Plan, and the response to the recommendations in this report. Complete
131	2	There should be a formal, open and transparent application and appointments process, both for external recruitment and internal promotions.	These arrangements are in place. Posts are advertised and applicants are short listed and interviewed. Clear selection criteria is used and candidates are scored against this. Complete
131	3	Unless there are exceptional circumstances, all vacancies should be advertised publicly and nationally, as well as internally, and promoted across a range of channels, platforms and sources.	Complete.
131	4	The practice of LOTO duplicating organisational roles that already exist within HQ should not be repeated.	This was addressed as part of Organise to Win and the new organisation structure was designed and implemented to remove this duplication. Complete
131	6	All staff should have a single, named line manager; and there should be a limit on the number of direct reports to each line manager.	Line manager: a line manager with 6 direct reports is a comfortable size. We only have four teams bigger than this for sound reasons of organisational design, and only one line manager has more than 8 direct reports. Single, named line manager: this was achieved by the end of 2021 when the new organisational structure was put in place and the organisation chart was published. Compete
131	7	There should be regular one to one supervision meetings between line managers and their direct reports, and a formal annual development review for all staff. Performance and conduct should be measured against objective criteria and a clear set of rules for employees, to avoid political interference.	The Party operates a performance management system which covers all of these points. Complete
131	9	The Party's workforce (including at senior management levels) does not reflect the wider electorate. Targets should be set in relation to recruitment, induction, and the development, and management of staff.	based on the 2021 census. Progress has been made in making the workforce more representative of the UK population with a higher proportion of BAME staff.
1. Recruitment			
132	1.1	The processes of external recruitment and internal promotions should be governed by a single, clear policy or suite of policies, the use of which should be mandatory.	Complete.

132	1.2	The relevant policy/policies should be subject to review, and revision, as necessary, at appropriate and agreed intervals.	We do keep policies under review and adapt them as required. The Party is sufficiently adaptable and flexible not to need to set agreed intervals. Complete	
132	1.3	The focus on advertising jobs externally and promoting those opportunities across a range of suitable channels, platforms and sources, should be on finding individuals: <ul style="list-style-type: none"> • with appropriate experience in the relevant field (such experience being valued at least as much as, and perhaps even more so than, a commitment to the Party or to politics in general); and • from a diverse range of backgrounds. 	Complete.	
132	1.5	In selecting who to recruit, the Party should use clear, objective and competency-based person specifications.	This is the practice which is followed. Complete	
132	1.6	Recruitment panels should always be appropriately representative of different minority groups and gender balanced.	Ongoing. We ensure that panels are gender balanced and, wherever possible, that they are appropriately representative. Complete	
132	1.7	Those responsible for recruitment should undertake relevant training, including unconscious bias training.	Ongoing. A significant proportion of the workforce has attended unconscious bias training and it is a requirement that all recruiting managers do so. Complete	

2. Induction

132	2.1	New staff should be required to undertake a comprehensive induction program	We are reviewing this and we recognise that this is an area where improvements can be made.	Improvements have been made to the induction process for all new recruits and now include an introductory meeting with the General Secretary. Inductions include an overview of the workings of the Party, the operation of the organisation as a whole and job-specific information. Complete
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3. Staff Development

132	3.1	The Party should create formal development/promotion frameworks for staff within each directorate setting out the skills and experience required at each level.	This is a duplication of recommendation 5 (on page 131 of the Report). The proposed actions are outlined there.	
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132	3.2	Structured learning and development opportunities should be provided in line with those requirements.	We are in the process of implementing this recommendation. The Operation Change Training Plan is now being implemented and other training continues to be provided through our learning management system and external providers, for example, unconscious bias training.	The learning and development plan has significantly progressed under the Operation Change training plan. Three levels of training are underway- leadership training, management training and an extensive campaigning one year programme started in early 2023. Complete
132	3.3	Salary bands should be published alongside those frameworks.	We will publish the new pay rates for 2023 in December. We will update this document on an annual basis following each pay settlement.	Salary bands were published internally at the beginning of 2023 and will be updated annually. Complete
132	3.4	Line managers should undertake common management development training.	This is in place under the Operation Change Training Plan. All managers are undergoing management training this year as part of an 18 month, 4 part programme. Complete	
132	3.5	This training should cover all relevant aspects of employment law, with input as appropriate from the human resources and legal teams.	This will be covered as part of the management training under the Operation Change Training Plan. Complete	
132	3.6	Line managers, and staff members, should continue to seek expert input from the human resources team, as required, in relation to any employment issues that may arise from time to time.	Ongoing. This is happening. Complete	
132	3.7	The human resources team should seek at all times to provide independent and objective advice to colleagues within the Party.	Ongoing. This is happening. Complete	
133	3.9	The formal annual development review for all staff should address the things that have gone well in the reporting year, and areas requiring development; priorities and objectives for the next reporting year; and health and well-being.	Ongoing. This is covered by our existing performance management system. Complete	
133	3.11	While it is to be hoped that any problems which may arise between a line manager and their direct report from time to time could be resolved satisfactorily on an informal basis, provision should be made within the performance review system for formal appeals/dispute resolution mechanisms.	Completed. This is covered by the Party's grievance policy. Complete	

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4. Staff retention			

133	4.1	Data on staff (particularly ethnic minority and disabled staff) departures over an agreed period should be collated and analysed so that staff retention issues can be identified and addressed.	This data is being captured and analysed. Complete	
133	4.3	Any redundancy process undertaken by the Party should be fair, and draw on the expertise of those in the human resources team and, if appropriate, legal advice.	Complete.	
133	4.4	Staff turnover should be monitored.	Complete.	
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5. Diversity and Inclusion				
133	5.1	Appropriate steps should be taken regularly to collect relevant data (including on all protected characteristics) to facilitate monitoring of progress towards the achievement of these targets.	This data is captured and shared with the D&I Board and the trade unions. Complete	
133	5.2	Information about gender and ethnicity pay gaps should be collated and published.	We are required by law to publish our gender pay gap and we do so. We have also published our first ethnicity pay audit this year. Complete	
133	5.3	The Party should develop a policy to tackle exclusion/discrimination/harassment, which includes clear provision about to whom such issues should be reported.	We have clear guidance in place for how staff report this includes Party staff. Parliamentary staff also have guidance on how to report. The Party also introduced rule changes in 2021 to automatically terminate an individual member's Party membership if they are found to have threatened, harassed or physically abused Party staff. Complete	
133	5.4	The Party should establish the diversity training outlined in the recommendations on Party culture and staff behaviour.	We have rolled out unconscious bias training for all staff which is mandatory. This has also been completed by the PLP, Shadow Cabinet and the NEC. We have also rolled out antisemitism training and many staff have completed Islamophobia training. We have organised line management training to ensure that line managers know how to deal constructively with staffing matters. Complete	
133	5.5	The Party should consider introducing the practice of 'reverse mentoring' to allow staff from diverse backgrounds to share with senior managers what it is like to work for the organisation.	We now have in place a staff mentoring scheme and this has included 'reverse mentoring'. Complete	
133	5.6	A regular staff survey, building on/repeating the Pulse survey, should be undertaken to track employee experience.	The current annual staff survey is currently being conducted. Complete	

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<i>Future relations between LOTO and HQ/regional staff</i>				
134	1	There should be a clearer formal demarcation and disentanglement of the roles played by LOTO and the Party's HQ staff.	These issues were addressed through Organise to Win. Complete	
134	3 (core)	The enhancement of information cooperation that we should be encouraged through the introduction of the following measures: <ul style="list-style-type: none"> • the contribution of both LOTO and HQ in staff inductions (whether the role is for LOTO, HQ or a regional office); • the regular exchange of information; and • the provision of spaces for physical learning and cross-pollination. 	Following feedback received given the nature of these recommendations, this will be considered by the Leader's Office and the General Secretary's Office and reported to the NEC in March 2023. Additionally, it is considered that this requires further definition. Whilst this presumably is intended to suggest that Party staff should act as akin to civil servants serving the political government of the day, we would suggest that this is not a direct comparison to the arrangement as between the political leadership of the Party and HQ, simply given the way the Party is constructed under its constitutional documents. Complete	Improvements have been made to the induction process for all new recruits and now include an introductory meeting with the General Secretary. Inductions include an overview of the workings of the Party, the operation of the organisation as a whole and job-specific information.
134	3	The practice of 'parachuting' LOTO staff into HQ roles without following the recommended recruitment practices should cease.	This practice has ceased. Complete	
134	5	Informal cooperation between LOTO and HQ should be enhanced and encouraged.	This is ongoing, but the key issues were addressed under Organise to Win. Complete	

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<i>Detailed recommendations on future relations between LOTO and HQ/regional staff</i>				
134	6	Senior leadership should take steps to improve their visibility and engagement with staff at all levels within the Party.	Whilst this work is on-going - since Organise to Win, and continuing with Operation Change - we must not be complacent about this. Complete	This work is on-going but imbedded into cultural improvements.

135	4	<p>We also make some observations on practical points to improve relationships between LOTO and HQ:</p> <ul style="list-style-type: none"> • we recommend that any new leadership team sits down and discusses informally with key HQ personnel their vision for the future, working relationships and so on; • deep listening exercises, conducted at intervals, could play a particularly valuable role in ensuring productive working relationships between LOTO and HQ; • opportunities for social contact between LOTO and HQ should be improved; and • the Party should consider “reverse mentoring” through which staff from diverse backgrounds share with senior managers what it is like to work for the organisation. This could be a useful early step in promoting cultural growth more generally. 	<p>This will be considered as part of the on-going analysis related to the Code of Conduct.</p>	<p>The recommendations that relationships between LOTO (now, the Leader’s office) and HQ/regional staff should improve are entirely in tune with the direction of travel under the current leadership since 2020. Considerable changes have been made including a strong emphasis on the clarification of roles and responsibilities; far better strategic planning, the removal of unnecessary and unhelpful duplication, improvements in management of teams. The new codes of conduct (and subsequent training) will be rolled out to all staff including Leader’s office and HQ/regional staff and a significant training programme for staff has been developed.</p> <p>Complete</p>
135	5	<p>The steps to be taken by senior leadership should include the following:</p> <ul style="list-style-type: none"> • a clear commitment from LOTO to spend more time in HQ, advertising that they are available to speak to all staff; and • regular sessions in which the General Secretary and team engage with staff. 	<p>This is ongoing.</p> <p>Complete</p>	<p style="background-color: #cccccc;"></p>