

# Prosiect pawb: Key findings

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In December last year I was asked by Plaid Cymru's National Executive Committee to Chair a working group whose remit it was to understand the culture within the party and issue recommendations on how to lead change. It was established in light of recent press reports of a toxic culture surrounding harassment, bullying and misogyny within Plaid Cymru. These issues cause grave concern and we have tried to better understand the scale and scope of the issues and to lead change within the Party to make it a safe and inclusive party.

Having worked in politics for over 20 years – the vast majority of women who I've worked with have experienced sexual harassment, and many sexual assault. Many men too. The overwhelming majority haven't used any formal or informal procedures or systems to complain. This speaks volumes.

Knowing what to change does require knowing what's wrong rather than the symptoms of what's wrong. We have covered a lot of ground in just over four months, the issues are complex as we are discussing HR issues – within the party, and across multiple employers, and Plaid Cymru as a membership body. We have also had feedback from an external organization that was commissioned before the start of our work to look at elements of our disciplinary processes.

No organisation or workplace is immune from misconduct of this kind but an environment where there is an inherent imbalance of power creates obvious vulnerabilities and concerns. This coupled with inaction over many years, from those with positions of power to challenge bad behaviour has made a bad situation even worse. Despite having robust complaints system in place, administered by a committed group of party volunteers, there are a lack of policies and procedures in place to deal specifically with sexual harassment, and there is lack of faith and trust in the policies we do have in place due to historic issues of inconsistencies in how our policies and procedures have been implemented which has exacerbated the situation.

Evidence from a recent anonymous survey of staff and elected members highlight

cases of sexual harassment, bullying and discrimination. These are not isolated cases. In the vast majority of cases of sexual harassment or bullying, the victim did not report it or make a formal complaint. From the evidence we have, the discrimination faced is mostly gender based. Some staff members felt unable to complete the survey for fear of being identified whilst others reflected a positive working environment.

Here is a summary of our key findings.

- Plaid Cymru has failed to implement a zero-tolerance approach to **sexual harassment**. We need to develop system to deal with the distinct issue of sexual harassment in the workplace and within the membership. A separate complaints procedure is needed, to outline how we take a zero-tolerance approach to sexual harassment within the party, how complaints of this nature will be dealt with, how confidentiality and anonymity will be protected. The party should also provide specialist independent support for complainants to support them throughout the process. Specialist advice on dealing with sexual harassment cases is needed for the disciplinary panel, and mandatory training. Our policies and complaints procedure should be publicly available
- There are many **HR issues** that need to be addressed urgently. Staff have reported bullying and discrimination in the workplace. We need to better understand the extent and scale of these issues. Many staff do not feel that there are safe systems to raise concerns, seek support or challenge what they see. They've seen too many instances of bad behaviour by elected members be tolerated and feel that there is little point in raising concerns. There is also a clear disconnection between staff in different parts of the party – and within the Senedd between group staff, the leaders' team, and constituency staff that needs to be addressed. In the limited information presented by the staff survey, the majority of reported discrimination is gender based. In too many instances our approach to staff welfare and implementing HR process and policies have been weak or inconsistently applied. Training is needed for managers – including politicians, HR policies need to be reviewed, improved and implemented. Our new Head of HR, Finance and Compliance in Tŷ Gwynfor has already made great progress since being in post over the last four months and should be commended. Feedback from staff based in Westminster was

positive regarding working practices and ability to raise concerns, the wider party should be learning from this.

- There has been a lack of collective **leadership and governance** across the party which has meant that these issues have worsened over the last few years. The relevant personnel and employment committee (now staff liaison) have been dormant, report recommendations that have been accepted by NEC have not actioned – and there has been a lack of scrutiny by the NEC. Our governance structures need a fundamental review.
- There are many issues that have contributed to an **organisational culture** which has a number of distinct challenges. Staff morale is low, and the feeling of working as a team – regardless of employer has disappeared, although there are signs of early improvements in recent weeks. Not all staff are represented on our staffing representative structures, and not all staff managers are being represented on our staffing representative structures. We need to support staff to re-establish networks across the party employment structures, e.g., communications staff, policy staff, office management staff, admin staff – to build relationships, share best practice and create a sense of one staff body regardless of employer. We also need to promote trade union membership and support the re- establishment of a Plaid Cymru Trade Union branch and strive to be an employer of choice.

Change will require collective responsibility and action, and there has to be, at the outset, an honest and open acknowledgment at senior level of the failings of the past and of the need to rebuild trust and restore the confidence of all those who work for the party, and within party membership. There are over 80 recommendations, which fall under the seven key themes - Sexual Harrasment, Governance and Leadership, Culture, HR process, Safeguarding, Complaints system and Ensuring change.

NEC must be confident that actions taken in the light of Prosiect Pawb's findings and recommendations will be effective in enabling permanent, non- reversible measures to detoxify a culture of harassment, bullying and misogyny and to make Plaid truly and visibly welcoming to women. This requires a greater commitment than simply accepting the report's contents and passing them to a senior staff member to co-ordinate.

# Summary of Recommendations

## 1. Sexual Harassment

**Recommendation 1: Review HR policies and procedures** surrounding harassment, sexual harassment, dignity and respect in the workplace to ensure consistency. Ensure that they are communicated across the party regardless of employer, and all staff, new employees and Elected Members should be made aware of them.

**Recommendation 2:** Personnel committee to **review HR policies** and procedures surrounding harassment, sexual harassment, dignity and respect in the workplace every two years and ensure consistency across all employers.

**Recommendation 3: Mandatory training** on harassment, sexual harassment, dignity and respect in the workplace for all staff and managers across the party.

**Recommendation 4: Codes of conduct** to be developed to set the minimum code of conduct expected by the Party of all its members and party representatives. It should include a specific code of conduct on sexual harassment and gender discrimination.

**Recommendation 5:** A specific and distinct **Sexual Harassment complaints procedure** (the Procedure) should be developed to include details of how sexual harassment is defined, how it will be dealt with within the party, support for complainants, ensuring confidentiality and anonymity of the complainant, and stages of the process. It should take into account the specific nature of politics as an environment and issues related to confidence, power and influence.

**Recommendation 6:** The process should appropriately consider a **pattern of behaviour** and should be designed to reflect historic cases, individual cases and cases where there are multiple complainants.

**Recommendation 7:** When allegations of sexual harassment are being investigated by party groups or party, we should be **open and transparent about the nature of the allegation** of Sexual harassment, without prejudicing the process.

**Recommendation 8:** The party should ensure **independent specialist advice** when dealing with complaints under the Procedure and in complex and sensitive cases.

This should include as a minimum specialist legal advice for the disciplinary panel. Victims of sexual harassment need to be confident the people they engage with as part of the complaints procedure have the experience and expertise to provide a supportive and understanding environment.

**Recommendation 9:** The principle that an **independent external investigator** shall be appointed to investigate complaints if appropriate / necessary in all circumstance to be adopted in complaints of sexual harassment.

**Recommendation 10:** The party should provide **specialist independent support for complainants of sexual harassment** throughout the complaints process, by a specialist charity such as victim support.

**Recommendation 11: Training for Head of Compliance** to support the code and in dealing with sexual harassment complaints.

**Recommendation 12: Regular, specialist training to be provided for members of the disciplinary committee** on the contents of the Procedure to deal with cases of sexual harassment.

**Recommendation 13:** The procedure should be **reviewed annually** to ensure it meets best practice.

**Recommendation 14:** Details of the Sexual Harassment complaints procedure, and support for potential complainants must be **accessible, and publicly available**.

## 2. Governance and Leadership

**Recommendation 15:** A discussion and decision needed by NEC on the role and objectives of **Merched Plaid** and what support it needs to succeed. Consideration should be given to attracting candidates for the 2026 election.

**Recommendation 16:** Urgent **review of governance** structures within the party in order to achieve robust governance procedures.

**Recommendation 17:** Appropriate **schedule of delegations agreed by NEC** – to better understand the role and powers of the NEC and the role and powers of the executive. Better understanding of roles of our leaders.

**Recommendation 18:** The party should create a **governance map** to be agreed by National Council, and comprehensive annual reporting to National Council on governance, activity, effectiveness assessments of committees etc linked to the corporate plan. This should include how party members are made aware of decisions.

**Recommendation 19:** Whole scale review of **NEC membership**, including directors, to achieve an appropriate, robust and effective governing body.

**Recommendation 20:** **Review executive support** is needed for NEC and its members to carry out their roles.

**Recommendation 21:** **Governance training** needed for members of the NEC to ensure meetings fulfil the role of the NEC, decisions logged and actions tracked to ensure that NEC members are accountable individually and collectively.

**Recommendation 22:** Governance changes to lead to a **review of standing orders** to be agreed by National Council.

**Recommendation 23:** **Handbook** needed for NEC members to ensure that they are made aware of the expectations on them. This should include ensuring a handover when taking on a new role.

**Recommendation 24:** Group **chief whips to produce a report** on each of their members for their constituency / regional committees to detail any upheld complaints. Further consideration needed on other information to include to include.

### 3. Culture

**Recommendation 25:** **Staff directory** to be kept in Ty Gwynfor of all staff across the party. Managers / employers to have duty to inform Ty Gwynfor of any changes.

**Recommendation 26:** Ensure that **all staff** employed by constituencies and councillors groups are reflected in staff representative structures.

**Recommendation 27:** Ensure that **all employers / managers** in constituencies or councillors groups are reflected on party structures.

**Recommendation 28:** In light of the reported incidences of bullying and discrimination in the workplace, Plaid to continue to engage with **external HR specialists** to support and offer advice to staff regardless of employer.

**Recommendation 29:** **Annual staff survey**, using this survey carried out in Dec 22 as a benchmark but building on its content to make sure we capture more information.

**Recommendation 30:** **Feed back to staff** on progress since the staff survey.

**Recommendation 31:** A facilitated **series of all staff sessions**, bringing together staff in a participative and engaging manner, exploring and building shared understanding and ownership around the future direction and ways of working of the Party. This should also include an annual all staff conference.

**Recommendation 32:** Support our **staff to re-establish networks** across the party employment structures e.g., communications staff, policy staff, office management staff, admin staff – to build relationships, share best practice and create a sense of one staff body regardless of employer.

**Recommendation 33:** **Whistle blowing policies** needed for staff across all employment in the party – following the ACAS code of best practice. Where policies have been developed for example by the Senedd Commission, these should be used, and promoted to ensure an understanding of its content amongst employees and employers.

**Recommendation 34:** **Promote trade union membership** and **support the re-establishment of a Plaid Cymru Trade Union branch** (historically PCS but for staff members to decide).

**Recommendation 35:** Strive to be **employer of choice** through the building on the basic HR practices such as:

- a. Robust HR processes in place in Ty Gwynfor
- b. Clear lines of accountability and job descriptions in place
- c. Training for managers
- d. Rolling programme of HR training
- e. Directory of staff held in Ty Gwynfor
- f. Directory of line managers / employers held in Ty Gwynfor

**Recommendation 36:** Revisit the findings of **2019 Womens survey** – and ensure recommendations are actioned.

**Recommendation 37:** Develop distinct **Social Media guidance** for members and elected members.

**Recommendation 38:** **Reengage with Chwarae teg** to seek support and review misogyny within the party, looking specifically at

- How sexual harassment and misconduct policies are actioned and implemented
- Candidate selection
- Policy development
- Branch operations
- National operations
- Employment practices

**Recommendation 39:** Revisit the review into **Antisemitism** to ensure its recommendations are actioned.

#### 4. HR Processes

**Recommendation 40:** The staff liaison committee or personnel committee to ensure that an **audit of all HR policies and procedures** across all employers takes place to ensure they are complete and up to date, with improvements linked to current practice and Party values.

**Recommendation 41:** The staff liaison committee or personnel committee to review the **implementation of policies** to ensure constituency of application.

**Recommendation 42:** **Training for all managers** including politicians, Councillor groups and line managers in constituencies in management processes, approaches and requirements. The personnel committee to ensure that this is implemented and maintained.

**Recommendation 43:** A formal **induction process** should be developed and instigated for all new elected members, to include training programme.

**Recommendation 44:** Review JDs and ensure a **shared understanding of staff roles** and responsibilities.

**Recommendation 45:** Clear processes in place for those managers who **manage staff on joint contracts**.

**Recommendation 46:** **Staff wellbeing policy** to be developed.

**Recommendation 47:** NEC to review the amended terms of reference for both the **Personnel Committee and the staff liaison committee** and ensure better



understanding of the reasons why they haven't historically been seen as an effective way to raise concerns or issues. Ensure Director responsibility for staffing and HR matters,

**Recommendation 48: The Personnel Committee and the staff liaison committee**, to create role descriptions for staff representatives to create a shared understanding of expectations of the role.

**Recommendation 49:** The Personnel committee to look at developing **Wellbeing and Pastoral Care approaches** and ensure that they are embedded across the party including in our disciplinary processes, and to designate one member with responsibility for staff welfare.

**Recommendation 50:** Develop a **Plaid Cymru staff handbook** for all staff, regardless of employer. High level document to share values, ways of working, details of policies and procedures, etc. And to ensure clarity in complaint processes and policies.

## 5. Safeguarding

**Recommendation 51:** Ensure the details of our **safeguarding policies** are better understood across the party and regularly updated.

**Recommendation 52:** Develop work already underway by disciplinary committee on safeguarding and produce a **safeguarding code of conduct** as part of members code of conduct.

**Recommendation 53:** Members seeking a place on the national register of approved candidates to complete **disclosure log of past convictions**.

**Recommendation 54:** Compliance officer report provided on **upheld complaints** on members seeking place on national register.

**Recommendation 55:** **DBS checks** for those on approved candidates list for violence / sexual offences / domestic abuse.

**Recommendation 56:** **Update candidate's contract** – to include essential training needed (unconscious bias, HR) and to include detail on behaviours expected.

**Recommendation 57:** Member of personnel committee to have responsibility for **staff welfare**.

## 6. Disciplinary Processes

**Recommendation 58:** The disciplinary committee to **review the approach to complaints of a serious criminal nature, and what sanctions should be put in place**. The committee also needs to consider how this would be different for elected members and those seeking to be candidates.

**Recommendation 59:** Complaints policies and system should be **publicly available** on website as with other parties in order to ensure greater awareness and understanding.

**Recommendation 60:** A **code of conduct** is needed for party members in order to express party's principles and values and set the minimum code of conduct expected by the Party of all its member. This should include detail on intimidation, harassment and abuse and should explain the kinds of behaviour likely to be regarded as sexual harassment.

**Recommendation 61:** **Review and strengthen the code of conduct for elected members**. Our party representatives should be held to a higher standard and expanding on Nolan principles. The Behaviour Code should also cover bullying and harassment and sexual harassment.

**Recommendation 62:** Support the plans of the Director of Equalities in developing a **behavioural framework** based on party values.

**Recommendation 63:** Ensure a programme of **training for disciplinary committee members** and amend the disciplinary handbook accordingly.

**Recommendation 64:** Ensure **diversity in the membership** of the disciplinary committee - in terms of gender, lived experience, level of power/authority.

**Recommendation 65:** Continue to **support our Head of Compliance, Finance and HR** - and awareness raised of her post and role within the party.

**Recommendation 66:** The Disciplinary committee to explore the '**duty to report**' element highlighted within the Jo Cox report when considering behaviours that are

intimidation and harassment, with the presumption of working towards being an 'active bystander policy.' This policy should look at whether the duty to report intimidation and harassment should be just on those within positions of power or authority in Plaid, and how is that defined, what mechanisms should be used to report and where are they reported to, what are the consequences if those in positions of power or authority don't report.

**Recommendation 67:** Establish **independent professional capacity** to support disciplinary processes in complex or sensitive matters.

**Recommendation 68:** Disciplinary committee to **develop raising concerns guidance** and share with elected members group for addition to their standing orders or guidance. This should include a definition of a concern, how confidentiality will be maintained, and how data and information will be stored. This should be in addition to the creation of an employee whistle blowing policy as outlined above.

**Recommendation 69:** **Pre and post complaint arrangements** to be developed and supported with guidance. Establish a clear set of wellbeing arrangements for both sides of any complaint process, together with guidance relating to their use. Compliance officer duty to ensure all parties are aware of the different stages of the process.

**Recommendation 70:** Clarity should be given to the **proportionality of outcome** of investigation in terms of sanctions at each of the different types of authority in their specific standing orders, which should also be appropriately reflected in the Plaid Cymru constitution and processes.

**Recommendation 71:** **Alignment needed between standing orders of each elected group.** The standing orders also need to be amended to include a reference to external disciplinary process and when issues should be referred to eg Standards Commissioner, party disciplinary process, police etc. They also should reinforce the 'duty to report' recommendation above.

**Recommendation 72:** Party group standing orders need to re-establish that **upheld complaints must be reported to NEC** and constituency / region.

**Recommendation 73:** Support and **guidance needed for chief whips**, following best practice and party principles – handbook to be developed in guidance rather than in standing orders.

**Recommendation 74:** When a complaint against elected members has been upheld in the Senedd, Parliament or in one of our Councillors group the case should be **referred immediately** by the relevant chief whip to the party disciplinary procedures. When a complaint is found to be upheld by our party disciplinary process against an MS, MP or Councillor, the disciplinary panel must inform the relevant chief whip.

**Recommendation 75:** Review group standing orders

- a. Greater clarity in disciplinary process, and when group is informed of complaints
- b. Reference how complaints will be referred to party complaints system
- c. NEC to be informed if complaint upheld. Chief Whip to produce report to constituency or region annually or when reselection takes place.
- d. Introduce raising concern guidance.
- e. Introduce Active bystander policy

**Recommendation 76:** The Disciplinary committee to develop guidance on capturing complaints, or information which point towards a **pattern of behaviour** that could trigger a disciplinary process.

**Recommendation 77:** Further work needed to review the following elements within our complaints system

- a. Whether the Disciplinary committee should have the power to remove members from the approved candidates list.
- b. Complaints system should enable complaints to come forward without the need for victims to come forward.
- c. Consider the level of resource needed to implement the changes, specifically supporting a new sexual harassment policy, procedure and support system.
- d. How best to deal with historic complaints against elected members, members of the national register and ordinary members.
- e. Annual review and report to NEC on GDPR and data protection systems
- f. Develop a vexatious complaints and unreasonable behaviour policy

**Recommendation 78:** To develop a clear **communications protocol** for disciplinary matters, to also include identifying a lead staff member to handle all communications considerations in disciplinary cases.

## 7. Ensuring Change

**Recommendation 79: Implementation plan** to ensure accepted recommendations are actioned. This will require a named person to take responsibility for each accepted recommendation.

**Recommendation 80:** NEC to ensure regular updated on delivery, and to **scrutinise the implementation**. With a **full review in a year's time** to measure progress following the next staff survey.

**Recommendation 81:** Adequate **financial resources** to be allocated by the leadership to ensure that this important area of accountability by the party is discharged appropriately, and adequate financial and personnel resources made available to discharge all of the recommendations in this document.

**Recommendation 82:** NEC must be confident that actions taken in the light of Prosiect Pawb's findings and recommendations will be effective in enabling permanent, non-reversible measures to detoxify a culture of harassment, bullying and misogyny and to make Plaid truly and visibly welcoming to women. This requires a greater commitment than simply accepting the report's contents and passing them to a senior staff member to co-ordinate. **Clear accountability and timelines for achievement** need to be established, and a named NEC member will act as Prosiect Pawb lead (with support from a named senior officer) in evaluating progress in every NEC meeting throughout 2023 with an end-of-year review in December 2023, which will recommend how to proceed into 2024.