



Singh Implementation

Six-month review

November 2021

Context

In 2019, the Prime Minister committed the Party to conducting a review of the Party's handling of complaints into all forms of discrimination, in particular with relation to anti-Muslim discrimination.

Professor Swaran Singh, a former Commissioner at the Equality and Human Rights Commission, was appointed to lead the investigation and conduct a thorough review of the Party's processes and historical outcomes. Following external engagement and consultation with the EHRC, the terms of reference for the independent investigation were published and Professor Singh commenced with the investigation. There were no limits on who Professor Singh could engage with and invite to take part in the investigation, and a public consultation was included and publicised by the Party on behalf of the investigation as part of the process.

Following the conclusion of the investigation in early 2021, Professor Singh presented his findings along with substantial recommendations to the Party Board. The Board accepted the recommendations in full, and the Party is committed to delivering these effectively and as swiftly as possible.

In consultation with the EHRC, an Action Plan was published by the Party within six weeks. With the addition of delivery milestones to support the delivery of each overall recommendation, this Action Plan has set the template for the Party's delivery of the Singh Review recommendations.

This review is an assessment of the process six months into the implementation phase, and provides an honest evaluation of the Party's progress in delivering each of the recommendations. The current overall delivery of recommendations is:

Six-week recommendations:

Complete: 4

Pending: 0

Six-month recommendations:

Complete: 8

Ongoing: 8

Pending: 0

Twelve-month recommendations:

Complete: 0

Ongoing: 2

Pending: 6

Foreword

The Conservative Party has a long history of breaking barriers, and allowing all to succeed and progress regardless of background. It is part of our political identity that the opportunity to succeed should be limitless for all, and as such our Party should be a welcoming environment for all, with no prejudice or discrimination on any grounds.

It was painful for all of us in the Party to read of the findings of the Singh Investigation, particularly with regard to the way in which our processes and procedures have at times failed those they should be there to protect. The Chairman at the time, the Rt. Hon. Amanda Milling MP, issued a full apology to those affected on behalf of the Party and pledged those past errors would not be repeated.

When publishing the outcome of the Singh Investigation, Professor Singh stated that the Party now has a responsibility to “make necessary changes, with measurable impact and progress”. It was in this spirit that the Board of the Conservative Party adopted Professor Singh’s recommendations in full and committed the Party to delivering these. Following discussions with Professor Singh and the Equality and Human Rights Commission, the Party published an Action Plan that set out how we would deliver the necessary changes.

The past six months have seen extensive consultation and collaboration to get us to this point. From our elected officials, our professional workforce, the Voluntary Party and engagement with external stakeholders, no stone has been left unturned and all areas of the Party have been involved in delivering the progress we have made so far. This report sets out the milestones we have already achieved, and the next steps that will be taken to see the Singh recommendations delivered in full within twelve months of their acceptance by the Party Board.

I am proud that of the six-month recommendations, all of them are either complete or underway, with a clear plan to get those still in progress over the line in the near future. When accepting the recommendations, it was clear that the objectives and timescales would be challenging. The changes already delivered have been substantial and represent a significant amount of work undertaken by the Party.

There is more work to do, and we should not underestimate the scale of the challenge that still lies ahead. But I am confident that the Party has the tools and desire to deliver this. Much of the groundwork has been done to deliver the infrastructure and reform of our processes that was required. It is now incumbent on everyone within the Party to see this turned into further action, with enhanced involvement in our training and development, and a focus on reaching out to those who are underrepresented within the Party or who have had a negative experience in the past.

As Professor Singh made clear, “the onus is now on the Party to act openly, publicly and decisively”. The Party’s leadership are committed to delivering on this responsibility. I am confident that the Party will continue to improve on the comprehensive work that is laid out in this report over the next six months.

Rt. Hon. Oliver Dowden CBE MP

Six-week recommendations

R1.1 Prepare Action Plan

The Party's leadership should publish an action plan describing how the Party and its leadership plan to tackle the failings and all recommendations highlighted in this report, and criteria against which the action plan's success will be measured.

Status: Complete.

Following consultation with the Party Board, internal stakeholders and the EHRC, the Party delivered an Action Plan that set out the timeframes and delivery milestones necessary for effective implementation of the Singh Recommendations.

The Action Plan was approved by the Board and published on the Party's website in July 2021 where it remains available to the public: [Singh Action Plan](#).

R1.6 Social Media Rules

The Party should review their Social Media Rules and clarify what is meant by "misused or abused social media".

Status: Complete.

A thorough assessment of the Party's social media rules was completed to ensure they reflect the Party's values. Legal advice was also sought on the definition of "misused or abused social media" to ensure that the Party has a consistent and fair definition of the term, allowing for complaints to be pursued fairly and effectively to ensure positive outcomes in all cases.

The updated definition for misusing or abusing social media is now incorporated in the Social Media Complaints Rules which are published on the Party's website: [Code of Conduct and Social Media Rules](#).

R2.1 Transparency of Complaints Panel

The Party should be notifying all complainants and respondents about whether their complaint will be referred to a complaints panel, and if so they should be notifying all complainants and respondents about the identity of members of the panel that is assessing their case. The expertise and/or experience of the members of the panel should be recorded to show the relevance to the nature of the complaint.

Status: Complete.

In conjunction with relevant legal advice, the Complaints team have implemented transparency points for all panels convened after 5th July 2021. For all panels, processes are in place to ensure complainants and respondents are notified if their complaint is being referred to a panel. Complainants and respondents are also informed of the identity of the panel members considering their case, and all records are kept by the Complaints team.

R3.1 Investigate allegations in Case Study E

The Party should launch a formal investigation into allegations of racism in the local association (Case Study E) and begin providing them with training to improve complaints handling and support to initiate cultural change.

Status: Complete.

The Party cannot comment publicly on individual complaints due to their confidential nature. In the matter of Case Study E, the Party believes this matter has been dealt with to the full extent possible and no further action is required.

Six-month recommendations

R1.2 Monitoring Recommendations

The Party should publish a six-month progress report, prepared by the Party.

Status: Complete.

This report fulfils this recommendation and is being made publicly available and submitted to the Board of the Conservative Party for their consideration and feedback. The report is also being shared with the EHRC for their consideration.

R1.5 Training Strategy

The Party should develop a strategy for how to improve the training it offers to local Associations.

Status: Complete.

Working in conjunction with the HR and Complaints teams, the Training Team has developed a comprehensive strategy for local Association training.

Incorporating best practice from other training that the Party provides for Associations, this strategy is focused on addressing the recommendations resulting from the Singh Investigation and empowering Association Officers to always act appropriately and handle all complaints sensitively and effectively.

It is the Party's intention that the delivery of this training will be multi-platform, being available to Associations via the Party's online training platform, as well as through regular webinars and training seminars at Party events such as Conference.

R1.6 Social Media Rules

Within six months the Party should develop training on acceptable social media use and distribute this to local associations.

Status: Complete.

The Training team has worked with the Complaints team to develop training for local Associations on acceptable social media use, and training sessions were hosted at the 2021 Conservative Party Conference. A series of webinars is in process to enable all Associations to take advantage of this training, and a written version of this training has also been produced for distribution to our Associations. Association Chairmen are being encouraged to share this online engagement guide as widely among their membership as possible.

R1.7 Standardise HR and complaints policies and procedures

The Party should ensure that all local, area and regional Associations have consistent human resources (HR) and complaints policies and procedures, to ensure consistency of culture and process at all levels.

Status: Ongoing.

The Party is in the process of developing consistent documentation to support HR practices and guidance across the organisation. Having identified a priority order for the delivery of this project, the Party is now working to deliver all the required documents and will review this material on a regular basis.

Guidance will be available to Associations via the Party's Campaign Toolkit in the near future.

R1.8 Community Outreach Strategy

The Party should develop a community outreach strategy that identifies key communities and representative groups for the Party to develop or improve relationships with. This strategy must have a particular focus on improving meaningful engagement with Muslim communities.

Status: Complete.

The Party's Community Engagement team have worked with key stakeholders within the Party as well as with external groups to identify the requirements for an effective outreach strategy. Taking into account the outcomes of the Singh Review, this new strategy is founded on the principle of long-term improvement of our relations with all communities and religious groups and reflects the Party's values of openness and equal opportunity for everyone.

Understanding that in the past the Party's outreach engagement has largely been pushed from the centre outwards, the new strategy aims to build an understanding at all levels of the Party on the responsibility everyone has to deliver these objectives. Working with MPs, Councillors, Associations and members, the outreach strategy will deliver greater accountability across the organisation for outreach work, and will be delivered through greater investment in the Party's Community Engagement team, which will be based across the whole of the United Kingdom.

R2.2 Publish comprehensive complaints policies and procedures

The Party should publish a comprehensive policy and procedure describing how complaints are handled, to ensure it matches or exceeds best practice, for example as set out by the EHRC. Guidance to cover/include:

- *what behaviour will be subject to investigation.*
- *when and how to make a complaint to a local association*
- *how to escalate a complaint made at local level to an area or regional association*
- *when and how to make a complaint to CCHQ*
- *how to make a complaint about social media activity, including how to archive and submit evidence of this activity to the complaints team*
- *the process for what happens once a complaint is made, including timeframes for an investigation to be completed and how the Complaints Team will communicate with complainants and respondents*
- *what to do if someone has made a complaint about you*
- *information about the composition of the Complaints Panel and how they assess the evidence*
- *a sanctions framework which specifies the types of behaviour that qualifies for each sanction*
- *the appeals process, including how to submit an appeal and how long appeals take to be reviewed*
- *the Party's Equality and Equal Opportunities Policy*
- *contact details for the CCHQ Complaints Team*

Status: Ongoing.

Alongside Recommendation 1.4, Recommendation 2.2 constitutes the most substantial element of the Singh Review recommendations and is also the most consequential for the Party's complaints processes and outcomes. The Singh Review found that the Party's procedures had at times failed both complainants and respondents, and rectifying this is the most vital step that can be taken to ensure these failures are not repeated.

The Party's complaints processes and procedures have been developed over an extended period of time, and the very structure of the Party has made these processes unnecessarily complex. Substantial work has been undertaken to rationalise all of the current processes in place and to understand the functioning of them. Starting from this point, the Complaints team has been working with legal advisers to develop a simpler complaints system that will deliver fairness and equality of outcomes for investigations at all levels of the Party.

However, due to the complexity of the Party's structures and the need for a new system to be easily applicable to complaints handled both centrally and at a local or regional level, this is not a process that can be rushed. The Party is committed to delivering a new complaints process that effectively addresses all of the concerns raised by Professor Singh, and is taking the time to ensure this is done in the right way, rather than as a tick-box exercise.

As a result, the Party's work to deliver this recommendation is ongoing. The Party will continue to update the Party Board on the delivery of this recommendation.

The Party should consider having a confidential helpline to support complainants and respondents through the complaints process.

Status: Complete.

The Party's HR, Training and Complaints teams have carefully considered this recommendation and the Party will not be establishing a confidential helpline at this time. Through the implementation of the broader Singh Review recommendations, the Party is seeking to provide clearer communication with both complainants and respondents throughout a complaint, and is also looking to simplify the complaints process as a whole.

The Party will also be increasing the training provided to Associations as well as to the Complaints team, with the objective of increasing the efficiency of, and level of empathy within, the complaints process.

This recommendation will be reviewed again 12-months on from the publication of the Action Plan.

The Party should also provide a link to the complaints page from their 'code of conduct' and 'contact us' pages of their website to make it easier to find.

Status: Complete.

Contact details for the Complaints team are available on both the 'Code of Conduct' and 'Contact Us' pages of the Party's website. Pending the outcome of Recommendation 2.2, if any further details or a dedicated webpage are established for the complaints procedure these pages will be updated to reflect this.

R2.3 Policy towards non-member volunteers

The Party should develop and publish a policy to disassociate itself from volunteers, who are not members but whose behaviour brings the Party into disrepute, for example by banning them from attending Party events or from volunteering for the Party.

Status: Complete (pending Board approval).

In consultation with the Voluntary Party and the Head of the Voluntary Party, the Party has established guidance for Associations on how to disassociate the Party from volunteers who are not members who do not uphold the Party's expected standards of behaviour.

R2.4 Internal guidance on complaints process

The Party should publish internal guidance on the complaints process including:

- *how to communicate with complainants and respondents empathetically throughout the process*
- *how to set expectations about the length of time an investigation is likely to take*
- *how and when to inform complainants and respondents that their case has been dismissed, progressed to the next stage, when an outcome has been reached or if there are mitigating circumstances resulting in delays*
- *how to recognise the emotional strain that the complaints process has on complainants and respondents and ensure communication is more compassionate*
- *how to ask complainants what outcome they are seeking from the process and set expectations*

Status: Complete.

Following the publication of the Action Plan, the Party has consulted widely with the Voluntary Party and external stakeholders on how to improve its complaints processes, and how to communicate with those involved in a complaints procedure as either a complainant or respondent.

Taking into consideration the outcomes of these consultations, the HR and Training teams have identified the training and guidance requirements for the Complaints team to deliver on Recommendation 2.4. This training is ongoing and will seek to build and improve the standards of communication and level of understanding within the team for the long-term. Delivery of the training programme has commenced, and will continue on a regular and ongoing basis.

R2.5 Clarify approach to complaints' handling

The Party should decide whether to handle all complaints centrally in CCHQ or improve the ability of local associations to handle complaints. Either decision requires increased staffing and training.

Status: Complete (pending Board approval).

The Party has consulted widely on this matter, and a decision has been drafted for discussion by the Party Board at the next Board meeting. Following that Board meeting, the outcome of this recommendation will be in the implementation phase before the end of 2021.

The Party has already increased staffing levels in the Complaints team and is in the process of increasing staffing of Voluntary Party Managers, who provide support to local Associations.

R2.6 Standardise recording of complaints

The Party should ensure that complaints are recorded consistently across all local Associations and CCHQ and recorded centrally.

Status: Ongoing.

The Party currently holds a database for the recording of all complaints that are received centrally, but currently no system is in place for consistent recording of complaints received at a local or regional level. It is not possible for the Party to put in place the system requirements needed to deliver this recommendation until Recommendation 2.5 is concluded.

Following approval of the decision for Recommendation 2.5, the Complaints team will identify the most appropriate platform for consistent recording of complaints, and will work with the Voluntary Party to issue appropriate guidance to Associations on how to record complaints in the future.

R2.7 Standardise recording of complaint outcomes

The Party should ensure that the reasons for suspending, overturning or lifting a sanction are recorded consistently across all local Associations and CCHQ.

Status: Ongoing.

As per Recommendation 2.6, the delivery of this recommendation is dependent on the decision pending in Recommendation 2.5. The Party will deliver the necessary database changes as soon as possible following this decision.

CCHQ now ensures that it is consistently recording the reasons and outcomes of all complaints handled by the Party centrally.

R2.8 Clarify complaints process for senior Party Members

The Party should have a clear process in place to investigate members at all levels of the Party, including the ability to launch independent investigations into allegations of discrimination against senior Party Members.

Status: Ongoing.

The Party's existing complaints process applies equally to all Party representatives regardless of their position or standing within the Party. The Party has no intention of altering this, and the changes made to the Party's Code of Conduct and complaints processes through the delivery of Recommendations 1.4, 2.1 and 2.2 will provide clarity on the complaints process for all Members.

R2.9 Improve complaints' data collection

The Party should improve the consistency and quality of data collection and analysis of complaints. These improvements would be significantly easier to achieve with the introduction of an online form with required fields.

Status: Ongoing.

Pending the outcome of Recommendations 2.5, 2.6 and 2.7, the Party will then commence delivery of this recommendation.

R2.10 Standardise recording of sanctions

The Party should ensure that all suspensions and expulsions are recorded accurately and consistently in the Party's VoteSource database to ensure that no one can be readmitted if they are still serving a previous sanction.

Status: Ongoing.

Pending the outcome of Recommendations 2.5, 2.6 and 2.7, the Party will then commence delivery of this recommendation.

R2.11 Improve follow-up of conditional requirements

The Party should ensure that all sanctions which require action by the respondent, such as attending training or issuing an apology, are conditional requirements for continued membership. The respondent must provide evidence that they have fulfilled the requirements and a suspension imposed or extended until proof of completion is submitted to the Complaints Team for verification.

Status: Ongoing.

The Complaints team are working with legal counsel to develop a policy for clearer communication of conditional requirements to respondents, as well as the evidence required for their membership to be reinstated following a suspension.

As per other recommendations, the implementation of the tracking capabilities for these requirements will be scoped for the Party's database as part of the larger overhaul of complaints tracking and recording. In the interim, the Complaints team are closely monitoring conditional requirements and liaising with colleagues across the organisation to confirm these have been fulfilled before any membership suspensions are lifted.

R3.2 Resolve outstanding cases

The Party should reopen investigations and resolve the cases included in this report where the complaints process has fallen short in the ways highlighted.

Status: Complete.

While the Party cannot comment publicly on individual complaints due to their confidential nature, Recommendation 3.2 has been fulfilled and all investigations raised in the Singh Review have been resolved.

Twelve-month recommendations

R1.3 Measuring implementation

The Party should ensure there is a one-year review carried out by the Investigation, or other appropriate body, to determine the extent to which the recommendations have been implemented.

Status: Pending.

The Party is considering whether the 12-month review should be completed by the Investigation or by an alternative appropriate, impartial body – the Party is committed to delivering a comprehensive review of the implementation of the Singh recommendations.

R1.4 Update Code of Conduct

The Party should produce and implement a single, easy to understand and mandatory code of conduct to be applied across the entire membership of the Conservative Party in England, Wales and Northern Ireland. This new Code should bring all local Party associations into line with the practices and policies of the Party and in compliance with the Equality Act 2010.

This new Code of Conduct should be accepted and signed by every existing member and should be signed by every new member as a condition of membership.

Status: Pending.

Alongside Recommendation 2.2, Recommendation 1.4 constitutes one of the most substantial elements of the Singh Review recommendations. As such, careful consideration is required to ensure an updated Code of Conduct is effective in delivering the fairness and equality of outcomes desired at all levels of the Party.

Consultation with the Voluntary Party is ongoing and will inform the updated Code of Conduct. Work on drafting an updated Code for consideration by the Board will commence upon completion of Recommendation 2.2.

R1.5 Training Strategy

The Party should disseminate guidance for local associations on how to improve their communication of the social media rules to their members.

Status: Complete.

As per Recommendation 1.6, the Training team has worked with the Complaints team to develop training for local Associations on acceptable social media use, and training sessions were hosted at the 2021 Conservative Party Conference. A series of webinars is in process to enable all Association Officers to take advantage of this training, and a written version of this training has also been produced for distribution to our Associations. All Associations will be encouraged to share this online engagement guide as widely among their membership as possible.

The Party should disseminate guidance for local associations on how to share lessons learnt and best practice.

Status: Ongoing.

Working with the Head of the Voluntary Party and Voluntary Party Managers, CCHQ is developing guidance for Associations on how to identify and share best practice. Currently it is proposed that this information will be passed to the Training team, who will incorporate best practice guidance and lessons learnt from Associations across the country in their training material and sessions.

The Party should provide training for local associations on what constitutes direct and indirect discrimination, harassment, and victimisation on the grounds of Protected Characteristics.

Status: Ongoing.

The Party has developed a comprehensive training strategy for local Associations that addresses the issues raised by the Singh Review. The Party is in the process of migrating to a new training platform, and is making a significant capital

investment in moving to a system that can better deliver the required training and tracking as highlighted by the Singh Review. The new system is scheduled for delivery in January 2022, and it is expected that training materials will be available to all Associations in Q1 2022.

The Party should provide mandatory training and guidance for association chairs, volunteer leaders and individuals responsible for handling and investigating complaints. Training courses should be offered on an annual basis to those who have not previously had the training. For those who have previously had the training, refresher courses should be offered every three to five years, with records of completion kept.

Status: Ongoing.

As per the above, the provision of training and the capability to track completion at an individual/Association level is expected to be delivered in Q1 2022.

R1.9 Local Association training requirements

Each association should have at least one named individual who has received appropriate training on the Equality Act 2010, including Protected Characteristics and the various forms of discrimination harassment and victimisation, the Party's complaints and training processes and the Party's Constitution, code of conduct and Social Media Rules. Training courses should be offered on an annual basis to those who have not previously had the training. For those who have previously had the training, refresher courses should be offered every three to five years, with records of completion kept.

Status: Pending.

The Party has comprehensively consulted with the Voluntary Party over the course of six months to identify what the training requirements for Associations are and will be implementing the necessary training as part of the refreshed training platform due for delivery in Q1 2022.

R1.10 Conduct training spot checks

The Party should be conducting regular spot checks of local Associations to ensure that training is being carried out and meets the expected standards.

Status: Pending.

As per Recommendation 1.5, the ability to conduct spot checks of local Associations will be delivered with the launch of the new training platform in Q1 2022.

The Governance team have begun the process of developing an audit policy and procedure, identifying who will be responsible for the conduct of the audit, the frequency of the audit, and the reporting of the audit findings.

R1.11 Requirements for candidates standing for elected positions

All candidates standing for elected positions must be required to demonstrate they have read and understood the Constitution, Codes of Conduct and equal opportunities policy.

Status: Ongoing.

The Party has consulted with the Voluntary Party on the best means of delivering this recommendation, and is in the process of developing an appropriate procedure for ensuring candidates are aware of the standards expected of them and demonstrate their understanding and acceptance of these policies and procedures.

R2.12 Improve identification of trends in complaints

The Party should improve identification of changing trends (such as complaints arising from social media activity) or regional clusters of behaviour.

Status: Pending.

As per Recommendation 2.9, the improved ability of the Party to record and track complaints will allow for delivery of this recommendation. The Complaints team will consult with external stakeholders on the most appropriate way to identify trends and address these in a timely manner.

R2.13 Identify balance between confidentiality and transparency

The Party should find a balance between confidentiality and transparency, which allows them to publish data on case volumes, completion times and outcomes, especially where these result in the most serious sanctions such as suspension and expulsion from the Party, or relate to specific Personal Characteristics, such as Religion & Belief (e.g. Islam).

Status: Pending.

Delivery of this recommendation is pending the outcome of the Party's review of the Code of Conduct, policies, and procedures as well as the implementation of the improved complaints and training tracking and monitoring capabilities. Once these are in place the Party will commence with developing a policy on confidentiality, transparency, and identifying what level of information and statistics can be made publicly available without compromising the integrity of the complaints process or the confidentiality of the individuals involved.

The delivery of this recommendation will be guided by legal advice, with the intention to publish an initial breakdown of complaints handled by the Party, including outcomes, in May 2022.