

ACTION PLAN

Response to the Singh Investigation

July 2021



Foreword

The Conservative Party has a long history of breaking through barriers, and it is core to our identity as a party that no one should be held back or discriminated against for any reason. Regardless of race, background, gender, religious belief, sexual orientation or any other circumstance, everyone should have the opportunity to succeed, and everyone should be welcome in the Conservative Party.

As Co-Chairmen of the Party, the allegations of discrimination and misconduct within our party were deeply upsetting. The Prime Minister committed to holding an independent investigation into these allegations and the Party's handling of complaints, and we welcomed this opportunity to address this important issue.

We are grateful to Professor Swaran Singh for his dedication and thoroughness in completing this truly independent investigation. We also do not shy away from the fact that the evidence found does not make for easy reading for any of us who love the Conservative Party.

While no evidence was found of institutional racism, it is clear that people have been let down by the Party. We are deeply sorry for these instances and are committed to putting right what has gone wrong in the past.

The Board of the Conservative Party has accepted in full every recommendation made by the Singh Investigation, and the first step in this process is the publication of an Action Plan setting out how we will implement the recommendations. This is that plan, laying out the roadmap and actions we will take together to put things right.

We will be updating our Code of Conduct so everyone is aware of the behaviour we expect of them. We will be improving our communications to members and training our Party officers to enable them to investigate and address issues effectively. And we will be clarifying how the complaints process works and what actions we will be taking at every step of that process.

The Party will also work with external stakeholders to ensure we are held accountable for the commitments made in this plan and are delivering them in line with the timescales and objectives set out.

Our country is so great because of the diverse communities and cultures that thrive here, and we want our party to share in that success. The Singh Investigation has challenged us to live up to that calling, and we are pleased to share this Action Plan and commit to making the Conservative Party truly welcoming for everyone.



**Ben Elliot and Rt Hon Amanda Milling MP
Co-Chairmen of the Conservative Party**

	Recommendation	Action Required	Singh Deadline	Delivery Dept.	Delivery Milestones	Success Measures
R 1	Nature and Extent of Complaints					
R 1.1	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.	Six Weeks	Party Chairmen's Office	Following meetings with internal teams over the course of May and June an action plan will be produced for publication.	Successful publication of the Action Plan by 6th July.
R 1.2	Monitoring Recommendations	The Party should publish a six-month progress report, prepared by the Party.	Six Months	Party Chairmen's Office	<p>A weekly delivery committee has been set up to project manage implementation.</p> <p>There will be monthly reports to the Party Board to update it on progress and ensure implementation remains on track.</p> <p>The committee will produce a progress update for the Board after 6 months and publish it on the Party's website.</p>	Successful publication of our progress report on the Party website.
R 1.3	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.	Twelve Months	Party Chairmen's Office	Party will consult with the EHRC and other stakeholders on how best to conduct a one-year review.	Appropriate body to have reviewed our implementation of the Singh recommendations after one year. This will be published on the Party's website.

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R 1.4	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.	Twelve Months	Legal Officer/ Head of Com- plaints	<p>Following discussions with stakeholders and the Voluntary Party a new Code of Conduct will be developed by the end of January 2022.</p> <p>Following this we will seek legal advice on the new Code and invite the EHRC to review it further before its adoption.</p> <p>New code to be signed off by the Party Board by March 2022. This will then be published on the Party's website.</p>	New code created, approved by the Board and communicated to all Party Members within specified time frame.
		A notice that this new Code of Conduct will be deemed to be accepted by every person who remains a Member beyond a certain date should be issued and should be signed, or expressly be deemed to be accepted, by every new member as a condition of membership.	Twelve Months	Membership/ Digital/ERM	<p>By December 2021 the membership team to have reviewed all pathways for joining or renewing membership and create an appropriate communications plan.</p> <p>By February 2022 there will be software updates to the Party membership renewal system to include a mandatory sign form to show that they have read new code of conduct</p> <p>These updates to be included in all membership renewals and join flows from publication of new Code.</p>	New code to be communicated to all existing Members within 12 months; changes made to joining process (and related infrastructure/IT) for new Members within 12 months.

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R 1.5	Training Strategy	The Party should develop a strategy for how to improve the training it offers to local associations.	Six Months	Training Team/ VPMs/ ERM	Over the course of July and August 2021 a training strategy will be produced by the CCHQ Training Team.	Production of an effective training strategy.
		<p>The Party should disseminate:</p> <p>Guidance for local Associations on how to improve their communication of the social media rules to their Members;</p> <p>Guidance for local Associations on how to share lessons learnt and best practice;</p> <p>and also provide:</p> <p>Training for local Associations on what constitutes direct and indirect discrimination, harassment and victimisation on the grounds of Protected Characteristics; and</p> <p>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.</p>	Twelve Months	VPMs/Training Team	<p>Guidance to be developed in July and August 2021. This will be launched at Party Conference 2021.</p> <p>Guidance to be developed in July and August 2021. This will be launched at Party Conference 2021.</p> <p>Guidance to be developed in July and August 2021. This will be launched at Party Conference 2021.</p> <p>Party to launch a review of relevant Party databases and the training platform to enable mandatory training to be recorded and tracked. This will be completed by December 2021. The system will also track and flag when refresher courses should be offered (every 3-5 years). Software requirements to enable tracking to be in place by January 2022. Mandatory training to commence following publication of the new Code of Conduct.</p>	<p>Guidance developed and disseminated through a series of webinars and Conference training events.</p> <p>Guidance will be refreshed annually to reflect best practice.</p> <p>Infrastructre updates implemented to ensure tracking and accurate records of completion.</p>

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R 1.6	Social Media Rules	The Party should review their Social Media Rules and clarify what is meant by “misused or abused social media”.	Six Weeks	Complaints Team	Seek legal advice to draft amendment of Social Media Complaints Rules to provide clarification of ‘misused or abused social media’. Final policy to be approved by Party Board in July 2021. General review of Social Media Complaints Rules to be undertaken in line with the review of the Code of Conduct as per R1.4.	Drafted amendments to clarify terms. Approval by Party Board in July 2021. Rules updated online following approval.
		The Party should develop training on acceptable social media use and distribute it to local associations.	Six Months	Training Team	Guidance to be developed in July and August 2021. Training will be launched at Party Conference 2021 and guidance issued to all association chairmen.	Guidance developed disseminated through a series of webinars and Conference training events.
R 1.7	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 processes at all levels.	Six Months	HR Team	Over July and August the Party will consult with local associations to assess current HR practices. Following this review the Voluntary Party, with assistance from CCHQ HR, will produce and distribute a consistent guidance pack for all associations.	Production and distribution of guidance pack by November 2021.

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R 1.8	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.	Six Months	Outreach Team	<p>Over the course of six months the Party will draw up a plan following consultation with external stakeholders.</p> <p>The Party will actively engage with external religious organisations and individuals who have contributed to the Singh review when drawing up this plan.</p> <p>The final plan will be ambitious and aim to improve our community outreach for the long term.</p>	<p>Improved opinions of stakeholders who provided evidence.</p> <p>Tangible evidence of collaborative working with list of stakeholders produced.</p>
R 1.9	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.	Twelve Months	VPMS/Training Team/Complaints Team	<p>Six month consultation with the Voluntary Party on how best to implement this recommendation.</p> <p>Following this consultation the Party will develop an implementation plan.</p> <p>This will be implemented in conjunction with R 1.5 Party to launch a review of relevant Party databases and the training platform to enable mandatory training to be recorded and tracked. This will be completed by December 2021.</p>	<p>One person from each Association to have received training and records updated to reflect this by May 2022.</p> <p>Refresher courses to be completed every 3-5 years.</p>

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R 1.10	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.	Twelve Months	VPM/ACM/ Governance/ Training	Training database to be developed over the next six months as per R 1.5. An annual will be completed following implementation of the training programme.	Introduction of a fit for purpose database to ensure that the necessary training is undertaken. The annual audit will be undertaken with results presented to the board which demonstrates that Associations have received the necessary training.
R 1.11	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, Code of Conduct and equal opportunities policy.	Twelve Months	Candidates Team / Local Government team	Party will launch a consultation with Voluntary Party to determine the most effective way of ensuring candidates engage with and can demonstrate understanding of the Party's rules. By March 2022 we will have developed a procedure to ensure all candidates for elected positions have read and understood the Constitution, Code of Conduct and equal opportunities policy.	Successful implementation of a procedure to ensure all candidates for elected positions have read and understood the Constitution, Code of Conduct and equal opportunities policy.

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R 2	Complaints Handling & Appropriateness of Sanctions					
R 2.1	Transparency of Complaints Panel	The Party 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.	Six Weeks	Complaints Team	Complaints team will obtain legal advice and implement R 2.1 as soon as possible within deadline.	Relevant transparency points are in place for panels convened after 5th July 2021 following approval of action plan from the Board. Specifically, processes are in place to ensure complainants and respondents are notified if their complaint will be referred to a panel and the identity of panel members, and to record the expertise/ experience of panel members.
R 2.2	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. This includes providing criteria on: 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;	Six Months	Complaints Team	In the period to July 2021, review best practice complaints policy and procedure from recommended third-parties and consult stakeholders. Develop a single policy and procedure document in line with best practice and recommendations. Take legal advice to ensure legal compliance / accuracy. Obtain Board approval October 2021. Communicate policy and procedure document to stakeholders. Work with colleagues to ensure it is incorporated in training programme.	Policy and procedure document created and published by November 2021. Upgrades to digital infrastructure completed and published on Party website.

	Recommendation	Action Required	Singh Deadline	Delivery Dept.	Delivery Milestones	Success Measures
R 2.2 contd.	Publish comprehensive complaints policies and procedures	<p>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;</p> <p>What to do if someone has made a complaint about you;</p> <p>Information about the composition of the Complaints Panel and how they assess the evidence;</p> <p>A sanctions framework which specifies the types of behaviour that qualifies for each sanction;</p> <p>The appeals process, including how to submit an appeal and how long appeals take to be reviewed;</p> <p>The Party's Equality and Equal Opportunities Policy;</p> <p>Contact details for the CCHQ Complaints Team;</p> <p>The Party should consider having a confidential helpline to support complainants and respondents through the complaints process; and</p> <p>The Party should also provide a link to the complaints page from their 'code of conduct'[3] and 'contact us'[4] pages of their website to make it easier to find.</p>	Six Months	Complaints Team	<p>Work with Digital to publish online and facilitate upgrades to infrastructure for successful delivery.</p> <p>Document to be reviewed annually to ensure it remains up-to-date.</p>	Policy and procedure document created and published by November 2021. Upgrades to digital infrastructure completed and published on Party website.

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R 2.3	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.	Six Months	VPMs	Over July and August CCHQ to consult with Voluntary Party and obtain legal advice. Board approval of new policy at September Board meeting.	Dissemination of new policy to the Voluntary Party and staff. Publication of new policy online and included in Complaints documents.
R 2.4	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; and How to ask complainants what outcome they are seeking from the process and set expectations.	Six Months	Complaints Team / HR Team	Complaints/Training team to source and undertake external training in complaints handling by no later than November 2021. CCHQ will consult with external stakeholders and Voluntary Party to review our complaints handling process in the light of the Singh Investigation. Following this we will publish new internal guidance and timeframes for our complaints process by November 2021.	Internal guidance document to be finalised, reviewed and circulated to all staff by November 2021.

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R 2.5	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.	Six Months	Party Chairmen's Office	Over the next two months the Chairman will consult members of the Board and senior volunteers. Board to discuss a recommended approach at the September board meeting.	Board to have taken the decision. Publication of an internal planning document to manage any changes to be implemented and identify any additional resources (and training requirements) required as well as any required updates to the Action Plan.
R 2.6	Standardise recording of complaints	The Party should ensure that complaints are recorded consistently across all local associations and CCHQ and recorded centrally.	Six Months	Complaints Team	Complaints Team to work with Voluntary Party Managers and Voluntary Party to develop a consistent recording policy for complaints. Processes for recording complaints will be reviewed following decision taken in R 2.5 and in conjunction with implementation of R 2.7	Agreed format of recording. Communicated to staff and Voluntary Party and incorporated in existing guidance by November 2021.
R 2.7	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.	Six Months	Complaints Team	Complaints Team to work with Voluntary Party Managers and Voluntary Party to develop a consistent recording policy for complaint outcomes. Following this review software changes to the Party's database will need to be developed and implemented. Final system changes to be made in November along with the publication of necessary guidance for associations. This guidance should also be incorporated into training as per previous recommendations.	Agreed format for recording decisions, communicated to staff and Voluntary Party and incorporated in existing guidance.

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R 2.8	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.	Six Months	Complaints Team	Existing process applies to all Party representatives regardless of level. Successful implementation of other recommendations including R1.4, R2.1, and R2.2 will provide clarity to the complaints process.	Implementation of new Code of Conduct for Members and clarification as to how these independent investigations under the Code and relevant sanctions apply to all members of the Party.
R 2.9	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.	Six Months	Complaints Team/IT/Digital	Options for new databases to be explored over the next two months. Final database proposal to be signed off by Party CEO in September 2021. Database to be implemented for use by the complaints team by November 2021.	Successfully source and implement new case management database with API linked online form for case submission.
R 2.10	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.	Six Months	VPM / Complaints / ERM	In line with R2.6 and R2.7, develop a consistent recording policy for sanctions. Updates to VoteSource software to ensure all sanctions are recorded and prevent readmittance to membership if still serving a sanction.	Agreed format for recording decisions, communicated to staff and Voluntary Party and incorporated in existing guidance and software updates by November 2021. The system should ensure that no-one can be readmitted if they are still serving a previous sanction.

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R 2.11	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.	Six Months	Complaints Team ERM/ Training	Complaints team to take legal advice and work with Panel Chairs to develop policy and improve language in decisions communicated to respondents to clarify conditional requirements within three months. Infrastructure/software updates to the training platform, VoteSource and new complaints databases outlined in earlier recommendations to facilitate conditional requirements and prevent respondent re-joining without completing sanctions.	Improved sanction recording and reporting facilitated by new case management database and updates to VoteSource to allow this to be linked to membership record and training platform. Improved decision write-ups by Panel Chairs to stipulate and clarify the requirement.
R 2.12	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.	Twelve Months	Complaints Team	This will be facilitated by new case management database as per R 2.9. In January 2022 the Complaints Team will consult with external stakeholders on how best to monitor changing trends.	Development of new report which will be produced for the Party Co-Chairmen to identify changing trends.

	Recommendation	Action Required	Singh Deadline	Delivery Dept.	Delivery Milestones	Success Measures
R 2.13	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).	Twelve Months	Party Chairmen's Office	<p>Transparency plans to be developed following the database improvements and changes to the Party's Code of Conduct.</p> <p>January 2022 – Legal advice will be obtained to allow for the correct balance between confidentiality and transparency.</p> <p>March 2022 – Draft transparency proposals to be approved by Party Board.</p> <p>First transparency report to be published around the anniversary of publication of the Singh report on 25th May 2022.</p>	<p>Successful publication of a transparency report in May 2022.</p> <p>This report will then be published annually thereafter.</p>
R 2.14	Introduce audit of complaints process	The complaints handling process should be audited annually and identified issues should be addressed within six months.	Six to Twelve Months	Party Chairmen's Office	<p>Over the next two months the Co-Chairmen will agree a series of KPIs for the Complaints Team.</p> <p>The teams performance will then be regularly checked against these KPIs by the relevant director and a report sent to the Party Board.</p>	<p>Successful introduction of KPIs for the Complaints Team and annual report to the Party Board.</p> <p>Any issues identified in the audit will be addressed in six months.</p>

	Recommendation	Action Required	Singh Deadline	Delivery Dept.	Delivery Milestones	Success Measures
R 3	Specific Cases					
R 3.1	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.	Six Weeks	Complaints Team	Obtain consent via the Investigation for the complainants to be identified and contact details released to the Party. Contact to be made with the individuals in relation to their allegations and invite to provide all evidence. Investigation to be completed within six months. Training developed as part of earlier recommendations and to be provided to the Association Officers as it becomes available.	Launch of investigation within six weeks (completed). Investigation to be completed within six months. Training undertaken by Association Officers.
R 3.2		The Party should reopen investigations and resolve the cases included in this report where the complaints process has fallen short in the ways highlighted.	Six Months	Complaints Team	Identify cases and review whether there is new evidence to be able to reopen investigations within three months. Any investigations to follow correct process in an efficient manner (timescale dependent on case but completion within six month timeframe). In all cases where the process has fallen short, Complaints Team to ensure that recommendations in this report are implemented to prevent future reoccurrence of shortcomings identified.	Resolution of any cases identified as having fallen short in the report.