

ACTION PLAN:

Driving out antisemitism from the Labour Party

RESPONSE TO THE EHRC REPORT
'INVESTIGATION INTO ANTISEMITISM
IN THE LABOUR PARTY'

17 December 2020

Foreword by Keir Starmer, Leader and Angela Rayner, Deputy Leader of the Labour Party

Since we were elected to the leadership of the Labour Party earlier this year, we have made rooting out antisemitism our number one priority.

The Equality and Human Rights Commission report on antisemitism in the Labour Party is incredibly difficult reading for everyone who loves our Party and wants it to be a force for good. But its findings were clear and stark: the Labour Party breached the Equality Act 2010 in terms of unlawful harassment and indirect discrimination towards our Jewish members.

We failed the Jewish community, our members, our supporters and the country. That is why we must act to drive antisemitism out of our Party and change the processes, structures and the culture of the Party to ensure Jewish people feel safe to return to their political home.

That requires more than just words. It requires action. The Action Plan for Driving out Antisemitism from the Labour Party published today sets out concrete steps and a timetable to do this.

First, we will change the way complaints of antisemitism and all other forms of racism are handled.

We will be establishing an independent process to investigate complaints of antisemitism, Islamophobia, racism, sexual harassment and any discrimination based on protected characteristics. To ensure there is no inappropriate political input into decisions, neither the Leader, the Deputy Leader nor our offices, will have any involvement in deciding the outcome of individual complaint cases, and we will employ external lawyers to advise antisemitism panel hearings. We will also address the backlog of antisemitism cases.

We will not hesitate to sanction those who breach our rules and regulations.

Social media guidelines will be strengthened and candidates wishing to represent the Party will undergo greater due diligence checks.

Second, we commit to greater transparency in our complaints processes to increase trust and confidence in our procedures.

To implement this Action Plan effectively, we will set up an Advisory Board composed of members from the Jewish community and a Reference Group to act as a sounding board and critical friend.

This Action Plan will help us act decisively against antisemitism in all its forms. It will hold us to the highest standards and ensure we neither miss incidences nor accept denial or excuses.

Restoring trust with the Jewish community and changing our Party's culture will take time and hard work, but we will do it.

As a Party, we know we have a mountain to climb. But our determination is undimmed – and our commitment to getting it right is absolute. We will only consider this work a success when members who left our Party because of antisemitism feel safe to return.

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SUMMARY OF KEY LABOUR PARTY ACTIONS:

- **Leadership committed to zero-tolerance of antisemitism, culture change and action against offenders**
- **Independent Antisemitism Complaints Handling Process to be set up as soon as possible**
- **All National Executive Committee and National Constitutional Committee antisemitism panels to be assisted by external lawyers**
- **Consultation with the Jewish community will be built into all aspects of the Action Plan. With immediate effect, we will establish a high-level Advisory Board and a Reference Group to work closely with the Labour Party and act as a sounding board**
- **Summary of case decisions to be posted on the Labour Party website**
- **Strengthen due diligence checks on candidates**
- **Labour Party website to be updated with dedicated pages for antisemitism complaints**
- **Develop a Complaints Handling Handbook for all staff and to especially guide those handling antisemitism complaints**
- **Strengthen social media guidelines to make clear that sharing or liking antisemitic content will be subject to disciplinary action**
- **Deliver, alongside Jewish stakeholders, appropriate antisemitism training for all staff**
- **Protocol to be published governing the Leadership's interaction with disciplinary and complaints procedures**

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The Action Plan to Drive out Antisemitism sets out in full the Labour Party's response to the Equality and Human Rights Commission (the **EHRC**) "Investigation into antisemitism in the Labour Party" published on 29 October 2020.

The Action Plan addresses each recommendation in the report in order, giving timescales for delivery and mechanisms to measure the success of each activity.

EHRC Monitoring

The EHRC will monitor the Action Plan for a period of two years. The key monitoring dates will be 29 April 2021, 29 July 2021, 10 December 2021 and 10 December 2022 at which the progress made towards specific outcomes will be assessed. The Labour Party will make monthly returns for the first six months to the EHRC to report progress and thereafter, the Labour Party will report quarterly. The Labour Party will also meet with the EHRC to discuss progress. These meetings will initially occur bimonthly but will reduce in frequency to quarterly meetings when agreed that it is appropriate to do so.

EHRC RECOMMENDATION	LABOUR PARTY ACTIONS	TIMESCALES	EHRC SIGN OFF POINTS	SUCCESS MEASURES
1.Living up to a zero-tolerance commitment				
1.1 Continue to build on its new Leadership’s statement regarding its failure to deal with antisemitism and acknowledge its responsibility for not living up to its commitment to zero-tolerance of antisemitism.	<p>Implement the proposals set out in this Action Plan emphasising commitment to reporting progress on:</p> <ol style="list-style-type: none"> 1. Dealing with cases; 2. Implementing new arrangements; and 3. Engagement with stakeholders (see 1.2). <p>Strengthen due diligence checks on candidates, prioritising remaining candidate selections for 2021.</p>	<p>Monthly returns to the EHRC for the first 6 months.</p> <p>From the last week of January 2021, quarterly reports until final sign-off (if agreed) by 10 December 2022.</p> <p>In addition, bimonthly meetings with the EHRC at first, reducing to quarterly meetings when agreed.</p>	<p>Monthly, and then quarterly, reports to the EHRC clearly demonstrate continuing commitment and identify progress made between each reporting period.</p> <p>Bimonthly meetings with the EHRC at first, reducing to quarterly meetings when agreed.</p>	<p>Provide monthly, and then quarterly, progress reports to the EHRC to update on action and demonstrate continuous commitment in each reporting period.</p> <p>Review of data referred to in 1.3, so as to ensure this commitment is being embedded throughout the organisation.</p>
1.2 Engage with Jewish stakeholders to develop and embed clear, accessible and robust principles and practices to tackle antisemitism and to instil confidence for the future.	<p>Identify key stakeholders and agree a mechanism for working together (terms of reference and personnel) on the Action Plan and its implementation.</p> <p>Design an agreed engagement programme with stakeholders to develop clear principles which inform all relevant Party processes (education and training, complaints procedures).</p> <p>Establish a high-level Advisory Board including Jewish community stakeholders.</p>	<p>Key stakeholders already identified.</p> <p>Principles agreed by 31 January 2021; and included in guidance by 31 March 2021.</p> <p>Terms of Reference and membership to be announced for both groups who will meet in January 2021.</p>	<p><u>Monitoring point 1</u> (29 April 2021) – Principles and practices have been developed in consultation with Jewish stakeholders and implemented as applicable to section 1.2.</p> <p><u>Monitoring point 2</u> (10 December 2022) – Those principles and practices have been embedded into the Labour Party’s approach to tackling antisemitism.</p>	<p>Provide terms of reference for both Advisory Board and Reference Group, developed in consultation with stakeholders.</p> <p>Request feedback as appropriate from the Advisory Board and Reference Group and throughout the implementation phase of this Action Plan.</p> <p>Monitor and track responses.</p> <p>Provide agendas and minutes to the EHRC once they are agreed</p>

	<p>The group will:</p> <ul style="list-style-type: none"> • review aspects of the plans; • develop clear, accessible and robust principles to tackle antisemitism; and • comment on the proposed independent element of the process. <p>Commission a Reference Group that:</p> <ul style="list-style-type: none"> • acts as a sounding board; • meets frequently; and • provides detailed advice and feedback on all relevant aspects of Action Plan. 			by group members to demonstrate adherence.
1.3 Make sure that it [the Party] has a system and culture that encourages members to challenge inappropriate behaviour and to report antisemitism complaints.	<p>The Labour Party launched Organise to Win (OTW) in July 2020. This was an independent review focused on the Labour Party's organisation and management to ensure it is fit and able to win elections, working to the highest possible standards.</p> <p>This included a review of structures, processes, systems and capability. A 'Culture Change' programme has been established as part of this to include the work on</p>	OTW has a clear implementation timetable ensuring that relevant measures in relation to this recommendation are in place by 29 April 2021.	<p><u>Monitoring point 1</u> (29 April 2021) – OTW incorporates work to promote a system and culture that encourages members to challenge inappropriate behaviour and report antisemitism complaints.</p> <p><u>Monitoring point 2</u> (10 December 2022) – Work under OTW has continued and led to measurable improvement against this recommendation.</p>	<p>Meeting the time frames set out as part of the OTW implementation timetable.</p> <p>Specific and carefully worded question on antisemitism to be included in the next Pulse (staff) survey for baseline and then on-going comparison survey by survey.</p> <p>All participants on training courses will be asked to provide feedback.</p>

	antisemitism and all forms of discrimination. With respect to the wider membership under the Action Plan, see 3.1, 3.2, 3.3 and 3.4.			
2. Rebuilding trust and confidence in antisemitism complaint handling				
<p>2.1 In line with its commitment, and as soon as rule changes allow, commission an independent process to handle and determine antisemitism complaints.</p> <p>This should last until trust and confidence in the process is fully restored and should ensure that independent oversight and auditing are permanently embedded in the new process.</p>	<p>The Labour Party is committed to bringing about an independent process as soon as possible.</p> <p>We recommend TWO options to be developed concurrently:</p> <p><u>Option 1:</u> Design and consult on a new independent complaints process which require any Rule Book changes at the next Labour Party Conference, which is normally held in September.</p> <p><u>Option 2:</u> As Option 1 will take significant time to implement, pursue independent elements to the process which are permitted without Rule Book changes, for example, independent scrutiny of complaint handling and independent advice to disciplinary dispute panels and/or extending the use of the</p>	<p><u>Option 1:</u></p> <p>Outline proposals to be designed by 29 April 2021 and consulted on by 29 July 2021.</p> <p>New system to be up and running as soon as practicable after Labour Party Conference in September 2021.</p> <p><u>Option 2:</u></p> <p>If agreed with EHRC and stakeholders, consult and design independent elements with the aim of fully introducing these by 29 April 2021.</p> <p>Up until December 2022, there will be regular monitoring reports to the EHRC.</p> <p>Continuous update and consultation with the Advisory Board and/or Reference Group.</p>	<p><u>Monitoring point 1</u> (29 April 2021) – Outline proposals on Option 1 developed and ready for consultation. Concurrently, outline proposals developed for Option 2, to be consulted on and implemented.</p> <p><u>Monitoring point 2</u> (29 July 2021) – Full consultation on proposals to implement Option 1 have taken place.</p> <p><u>Monitoring point 3</u> (10 December 2021) – An independent process is up and running and will be used to determine 100% of applicable* antisemitism complaints.</p> <p><u>Monitoring point 4</u> (10 December 2022) – An independent process will have been up and running for at least 12 months and determining</p>	<p>Criteria for success of either one or both of the independent processes will be published alongside the terms of reference.</p> <p>They will include timescales for hearing cases and feedback from individuals using the system and will last until trust and confidence in the process is fully restored:</p> <ul style="list-style-type: none"> • An increase in positive feedback from individuals utilising the system measured by regular feedback for those running the applicable independent process - measured against feedback gathered at the initiation of the independent process; and • Further measured by ensuring that 100% of

	<p>General Secretary's powers of delegation.</p> <p>Consultation with legal experts, regulatory bodies and stakeholders on both options.</p> <p>Terms of reference drafted and consulted on for Option 1 by 29 July 2021; and Option 2 (if agreed during consultation) to be up and running by 29 April 2021.</p> <p>Working closely with key stakeholders to inform approach.</p> <p>Propose any necessary rule change to enable new arrangements as soon as practicably possible.</p> <p>Recruit and appoint key individuals in accordance with Options 1 and 2.</p>		<p>100% of applicable* antisemitism complaints.</p> <p><i>*refers to all cases that are not at the adjudication stage under the existing system, as well as any new complaints.</i></p>	<p>complaints are dealt with by the independent process within 6 months of its establishment.</p> <p>In respect of ensuring that independent oversight and auditing are permanently embedded in the new process:</p> <ul style="list-style-type: none"> An increase in positive feedback from individuals utilising the embedded new process and how that compares to the immediately preceding independent process, to analyse trends and ensure that trust and confidence in the system is maintained.
<p>2.2 Acknowledge, through its leadership, the effect that political interference has had on the handling of antisemitism complaints and implement clear rules and guidance that prohibit and sanction political interference in the complaints process.</p>	<p>Political leadership is underway and being emphasised on a regular basis. For example, the Leader's first speech on 4 April 2020 and the Leader's announcement on the day of publication of the EHRC report on 29 October 2020.</p> <p>Response to 1.1 also relevant. The clear rules and guidance to</p>	<p>Continuous senior leadership commitment.</p> <p>Following discussion with stakeholders, the new Complaints Handling Handbook will be in place by 31 March 2021.</p> <p>As and when rules and procedures are changed, the</p>	<p><u>Monitoring point 1</u> (29 April 2021) – Rules and guidance in place to prohibit and sanction political interference in the complaints process.</p> <p><u>Monitoring point 2</u> (10 December 2022) – Rules and guidance on political interference have been applied</p>	<p>Such acknowledgment is underway on a regular basis and will be monitored on a regular basis and will continue to be reviewed regularly. See 1.1 above.</p>

	<p>prohibit and sanction political interference (as defined in the EHRC report) will be dealt with under 2.3.</p> <p>Additionally, a protocol to be published governing the leadership's interaction with disciplinary and complaints procedure and prohibiting involvement in the outcome of any complaints.</p>	Complaints Handling Handbook will be updated.	in all relevant cases since 29 April 2021.	
2.3 Publish a comprehensive policy and procedure, setting out how antisemitism complaints will be handled and how decisions on them will be made. This should include published criteria on what conduct will be subject to investigation and suspension, and what will be considered an appropriate sanction for different types of proven antisemitic conduct.	<p>Review all existing guidance, and check for gaps/overlaps, etc.</p> <p>Create a new Complaints Handling Handbook which covers all necessary points as per the EHRC report. Based on the <i>“clear, accessible and robust principles and practices to tackle antisemitism”</i> mentioned in 1.2.</p>	<p>Following discussion with stakeholders, the new Complaints Handling Handbook will be in place by 31 March 2021.</p> <p>As and when rules and procedures are changed, the Complaints Handling Handbook will be updated.</p> <p>The Handbook will reflect the new independent elements of the complaints process as soon as it is in place (per 2.1).</p> <p>Antisemitism guidance for complainants and respondents will also be developed and sent with acknowledgement of case handling by 31 March 2021.</p>	<p><u>Monitoring point 1</u> (29 April 2021) – A comprehensive policy and procedure sets out how antisemitism complaints will be handled.</p> <p><u>Additional monitoring point 1</u> - update on 29 July 2021 on how those decisions will be made for both Options 1 and 2.</p> <p><u>Monitoring point 2</u> (10 December 2022) – The policy and procedure has been followed in all relevant cases since 29 April 2021 or 29 July 2021 (as applicable).</p>	<p>Roll out of the new Complaints Handling Handbook to staff dealing with complaints by 31 March 2021.</p> <p>All staff to be informed on new Complaints Handling Handbook via staff intranet.</p> <p>All staff employed to handle complaints will be attending ‘Antisemitism Complaints Handling Training’ from February/March 2021.</p> <p>All complainants and respondents will receive antisemitism guidance as part of the process of acknowledgement of their case from 31 March 2021.</p>
2.4 Develop and implement comprehensive internal guidance for all stages of the	A similar approach should be taken as to 2.3 above.	New Complaints Handling Handbook will be in place by 31 March 2021 and emailed to all	<u>Monitoring point 1</u> (29 April 2021) – Comprehensive internal guidance covers all stages of the	Signposting staff to the relevant page of the Labour Party’s

<p>antisemitism complaints process on:</p> <ul style="list-style-type: none"> • decision-making criteria; • robust record-keeping, including recording reasons for decisions • timescales; and • communication, including regular communication with complainants, <p>and clear rules regulating the use of informal methods of communication in the complaints process.</p>	<p>Taken together, 2.3 and 2.4 should act as a complete guide to handling antisemitism in the Labour Party, and be capable of being produced consistently in a range of formats depending on the audience – those who run the complaints system, those who want to access it, staff and stakeholders more generally for information and reassurance about the seriousness of Party’s response.</p>	<p>staff and permanently located on the Labour Party’s website.</p> <p>The Handbook will reflect the new independent elements of the complaints process as soon as it is in place (per 2.1).</p>	<p>antisemitism complaints process and there are clear rules regulating the use of informal methods of communication in the complaints process.</p> <p><u>Additional monitoring point 1</u> - update on 29 July 2021 on how those decisions will be made for both Options 1 and 2 (as per 2.1).</p> <p><u>Monitoring point 2</u> (10 December 2022) – The internal guidance and rules on informal methods of communication have been complied with in all cases since 29 April 2021.</p>	<p>website via an all staff email by 31 March 2021.</p> <p>Written communications will be cascaded to all staff with a requirement for mandatory review in one month.</p> <p>Line managers will require signed acknowledgement.</p> <p>As of the date the new guidance is completed and issued (and anytime it is subsequently updated), directing 100% of complainants and respondents to that guidance with effect from the relevant date.</p> <p>Outcome summaries including number of complaints per quarter per region, broken down by type of complaint (social media, verbal comment in a meeting, etc.). It is proposed that these are broken down as follows:</p> <p>(i) the number of cases waiting to be considered;</p> <p>(ii) the number of cases under investigation; and</p> <p>(iii) the number of cases that are closed.</p>
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<p>2.5 Review and update the '<i>Code of Conduct: Social Media Policy</i>' to make it clear that members may be investigated and subject to disciplinary action if they share or like any antisemitic social media content.</p>	<p>Strengthen the Code of Conduct: Social Media Policy to include disciplinary action if antisemitic (or other discriminatory) content is liked or shared online.</p> <p>To be included in the Complaint Handling Handbook as soon as it is agreed and published.</p>	<p>Code of Conduct to be reviewed and discussed with the Advisory Board/Reference Group as early as possible next year.</p> <p>It will be published on the Labour Party website as soon as agreed, and no later than 29 April 2021.</p> <p>Further action as per 2.3.</p>	<p><u>Monitoring point 1</u> (29 April 2021) – The Code of Conduct has been updated and published on the Labour Party website.</p> <p><u>Monitoring point 2</u> (10 December 2022) – The Code of Conduct has been applied in all relevant cases since 29 April 2021.</p>	<p>The Code of Conduct is updated and published on the Labour Party website as soon as agreed.</p> <p>On that same date, an all staff email will be sent identifying the relevant page of the Labour Party's website, making review mandatory within 1 month.</p> <p>Line managers to collate acknowledgement.</p> <p>100% of all complainants and respondents will be directed to the new guidance on the website.</p>

<p>2.6 Make sure that NCC panels are routinely assisted by an external lawyer in the same way that NEC antisemitism panels are.</p>	<p>An external lawyer is routinely assisting all NCC panels.</p>	<p>By 31 January 2021.</p> <p>See Monitoring point 1.</p>	<p><u>Monitoring point 1</u> (29 April 2021) – All NCC panels that have taken place since 31 January 2021 have been assisted by an external lawyer drawn from a panel of suitably qualified lawyers.</p> <p><u>Monitoring point 2</u> (10 December 2022) – All NCC panels that have taken place since 31 January 2021 have been assisted by an external lawyer drawn from a panel of suitably qualified lawyers.</p>	<p>100% of all NCC cases that have not been empanelled or begun hearings by 31 January 2021 will be routinely assisted by an external lawyer drawn from a panel of suitably qualified lawyers.</p> <p>By 31 January 2021, this will be in place.</p>
<p>2.7 Take steps to increase transparency in the disciplinary process, as highlighted by the HASC report, by reporting regularly on the reasons for the final outcome decisions in antisemitism complaints, taking account of legal requirements to publish anonymised information where appropriate.</p>	<p>A new antisemitism complaints handling webpage will be uploaded by 31 December 2020 and look to include the data referred to in 2.4.</p> <p>It will mirror the pages for dealing with Sexual Harassment cases.</p> <p>The first summary report outlining the final outcome decisions in antisemitism complaints will be published on the Labour Party website by 29 April 2021.</p>	<p>By 31 December 2020 and in advance of any necessary systems upgrades.</p> <p>In respect of the first summary report, by 29 April 2021.</p> <p>Further action as per 2.4.</p>	<p><u>Monitoring point 1</u> (29 April 2021) – At least one performance report has been published on the Labour Party’s website.</p> <p><u>Monitoring point 2</u> (10 December 2022) – Subsequent performance reports have been published quarterly.</p>	<p>From 29 April 2021, a regular summary report outlining the outcome of cases – including how many cases were upheld, how many dismissed and recommended outcomes – will be published on the Labour Party website.</p>

<p>2.8 In line with the recommendation of the Royall report, make sure the complaint handling process is resourced properly so that it can deal with antisemitism complaints effectively and without delay.</p>	<p>Identify the resources, and associated costs (set up, staff, systems) identified in this Action Plan.</p> <p>Consider necessary steps for recruitment.</p>	<p>Initial review of current and likely future costs, along with identifying possible resources and recruitment processes to be linked to timescales and options in 2.1 above.</p> <p>Funding proposal developed alongside the terms of reference.</p>	<p><u>Monitoring point 1</u> (29 April 2021) – Action to ensure complaint handling is adequately resourced, evidenced by measurable improvements in a) handling antisemitism complaints b) clearing of the backlog.</p> <p><u>Monitoring point 2</u> (10 December 2022) – Complaint handling continues to be adequately resourced, evidenced by the fact antisemitism complaints are being determined effectively and without delay.</p>	<p>Regular summary report in line with 2.7, 4.1 and 4.2.</p> <p>Analysis of any trends and changes arising out of staff surveys and the implementation of OTW, in line with 1.3 above.</p>
<p>3. Education and training</p>				
<p>3.1 Commission and provide education and practical training for all individuals involved in the antisemitism complaints process.</p> <p>This should be implemented fully within 6 months of publication of this report and, from that date, should be mandatory before any individual is allowed to be involved in any stage of the antisemitism complaints process.</p>	<p>In consultation with stakeholders design a training programme to identify and tackle antisemitism for those handling complaints.</p> <p>Procure and roll out training.</p>	<p>Training to be completed by 29 April 2021.</p>	<p><u>Monitoring point 1</u> (29 April 2021) – Training has been completed by all individuals involved in the antisemitism complaints process.</p> <p><u>Monitoring point 2</u> (10 December 2022) – From 29 April 2021, any individual becoming involved in the antisemitism complaints process has completed training prior to their involvement commencing.</p>	<p>All staff handling complaints will be trained within 3 months.</p> <p>All new starters handling complaints will be given this training as part of their induction.</p>

<p>3.2 Make sure that all members found to have engaged in antisemitic conduct (apart from those who are expelled) undertake an educational course on identifying and tackling antisemitism, regardless of the level of sanction applied.</p>	<p>Ensure that this requirement is built into the agreed processes, so that the action (sending the individual on the course) is automatically triggered on completion of the process.</p>	<p>Continuous.</p>	<p><u>Monitoring point 1</u> (29 April 2021) – Educational course has been developed and is ready for implementation.</p> <p><u>Monitoring point 2</u> (10 December 2022) – From 29 April 2021 (or as soon as a training provider is agreed, whichever is soonest), all members found to have engaged in antisemitic conduct (apart from those who are expelled) are required to complete the educational course within 4 weeks of their disciplinary outcome.</p>	<p>Monitoring demonstrates that this has taken place.</p>
<p>3.3 Roll out a programme of education and training on identifying and tackling antisemitism, for all staff, Party officials, and other members in positions of responsibility within the Party.</p> <p>We note the Leader of the Labour Party’s statement about his ambition to roll out training to all Labour Party staff as soon as possible.</p>	<p>As per 3.1.</p> <p>All other staff, and members in position of responsibility, to participate in a rolling programme from March to June 2021.</p>	<p>Training for those handling complaints to be completed by 29 April 2021.</p> <p>All other staff, and members in position of responsibility, to participate in a rolling programme from March to June 2021.</p>	<p><u>Monitoring point 1</u> (29 April 2021) – Providers identified, and education and training rollout agreed for members, Party officials and other members in positions of responsibility within the Labour Party.</p> <p><u>Monitoring point 2</u> (10 December 2022) – Continuous training and education in place for all training and education for those identified above complete.</p>	<p>Training for all staff handling complaints to be completed by 29 April.</p> <p>All other staff, and members in position of responsibility, to participate in a rolling programme from March to June 2021.</p>
<p>3.4 Develop all education and training programmes on antisemitism in consultation with Jewish stakeholders.</p>	<p>Relates to 1.2.</p> <p>The clear, accessible and robust principles and practices agreed</p>	<p>Consultation with Jewish stakeholders on education and training programmes to be completed by 29 April 2021.</p>	<p><u>Monitoring point 1</u> (29 April 2021) – All education and training programmes on antisemitism have been</p>	<p>Engagement with Jewish community stakeholders, especially Jewish Labour Movement, in the establishment and</p>

	will be embedded into the training.		developed in consultation with Jewish stakeholders. <u>Monitoring point 2</u> (10 December 2022) – Any substantive changes to education and training programmes are made in consultation with Jewish stakeholders.	development of such training.
4. Monitor and evaluate improvements to the process to ensure lasting change				
4.1 Collect, analyse, and publish quarterly data that enables a comparison between the handling of antisemitism complaints and other types of complaint. This should include the number of complaints, the outcome, what body made the decision (the Governance and Legal Unit, the NEC or the NCC), the sanctions applied, the time taken for completion and how many complaints remain outstanding.	Implementation to commence with immediate effect and changes included as part of the new guidance in 2.4. Existing systems for data collection should be reviewed and upgraded where necessary to ensure smooth and efficient delivery.	Immediate commencement of implementation but completion partly dependent on timing of necessary system changes.	<u>Monitoring point 1</u> (29 April 2021) – The first set of data has been collected, analysed and published. <u>Monitoring point 2</u> (10 December 2022) – Subsequent sets of data have been collected, analysed and published quarterly.	Systems demonstrably in place and regular reports show an improving position, in line with 2.1. In addition to the reports referenced in 2.1, the following data points will be used to analyse the quarterly data in respect of antisemitism complaints/complaints involving protected characteristics: <ul style="list-style-type: none"> • Feedback will be sought from complainants and respondents on the efficiency and speed with which the complaint was dealt with; • Analysing whether the number of complaints

				<p>about the complaints process has decreased in the intervening periods;</p> <ul style="list-style-type: none"> • Making use of publicly available polls that reference the Labour Party's complaints handling process; and • Analysis of any trends and changes arising out of staff surveys and the implementation of OTW, in line with 1.3 above.
4.2 Audit its complaint handling processes on a regular basis, including response time and consistency of outcomes, including sanctions, and make changes to address any issues identified.	As per 4.1.	Immediate commencement of implementation, but completion partly dependent on timing of necessary system changes.	<p><u>Monitoring point 1</u> (29 April 2021) – First audit has been completed.</p> <p><u>Additional monitoring point</u> - update 29 July 2021. Plans made to address any issues identified.</p> <p><u>Monitoring point 2</u> (10 December 2022) – Subsequent audits have taken place every quarter and changes have been made to address any issues identified.</p>	Systems demonstrably in place and reports being produced accordingly, in line with 2.1.
4.3 Measure staff and stakeholder confidence in the complaint handling process and respond appropriately to the feedback.	<p>Conduct regular and frequent staff and stakeholder surveys.</p> <p>Prepare a report to the NEC every 6 months, with a view to moving to annual reporting after the first year.</p>	<p>Baseline survey by 31 March 2021 for stakeholders.</p> <p>Pulse staff survey to be conducted by June/July 2021 with subsequent survey annually.</p>	<p><u>Monitoring point 1</u> (29 April 2021) – First baseline survey to have been conducted by 31 March 2021 and action taken in response to feedback.</p>	Regular reports show an improving position, in line with 2.1.

	Regular updates to stakeholders throughout.	Members will be asked for feedback by 31 March 2021.	<u>Monitoring point 2</u> (10 December 2022) – Subsequent surveys to have been conducted by 30 June 2022.	
4.4 Put in place long-term arrangements for independent oversight of the complaint handling process, to make sure that standards are monitored and enforced, and adequate resources are in place.	Should be covered in responses to 2.3 and 2.4.	New Complaints Handling Handbook to be in place by 31 March 2021. The Handbook will reflect the new independent elements of the complaints process as soon as it is in place (per 2.1).	In respect of 4.4 only, <u>Monitoring point 1</u> will be 29 July 2021 to update on progress made with respect to long term arrangements. <u>Monitoring point 2</u> (10 December 2022) – Long-term arrangements are in place.	See 1.1, 1.2 and 1.3.

