



**Independent Complaints
and Grievance Scheme**

ICGS Independent Investigators

June 2026



Background & Context

The Independent Complaints and Grievance Scheme (ICGS) was established in 2018 as Parliament's independent mechanism for investigating complaints of bullying, harassment, and sexual misconduct. It is a parliament-wide response to allegations of bullying, harassment and sexual misconduct in the parliamentary community. The team provides essential support to the operation of this important, high-profile service and its continued evolution. The ICGS team is a bicameral service and is open to all current and former members of the parliamentary community. Since 2018 it has developed in response to external independent 6-month and 18-month reviews, as well as a more recent 2024 [external review](#) conducted by Paul Kernaghan in 2024. Further information about the ICGS can be found on our [website](#), or in our latest [annual report](#).

The ICGS is formed of several parts and is underpinned by the [ICGS policy Framework](#) and [procedures](#). Any complaints made to the ICGS are first triaged at an Initial Assessment stage, and if found to be eligible are investigated by an Independent Investigator from our Framework of Investigators. There is also a small team of staff in Parliament (referred to as the 'ICGS Team'), who help to administer the scheme, provide support to users, provide outreach and engagement activities, and quality assure the helpline and investigations. These activities align with our three key priorities:

1. **Service user focus.** To raise awareness of the Scheme, support everyone who comes to the ICGS to make informed choices and support all service users in a way that meets their needs.
2. **High quality investigations.** To deliver independent, high quality and timely assessments and investigations into bullying, harassment, and sexual misconduct allegations.
3. **Building trust and confidence.** To enhance trust and confidence in the Scheme across the parliamentary community through transparency, good governance, collaboration and engagement.

The Requirement

UK Parliament is seeking up to 20 individual suppliers to join a newly established Open Framework of Independent Investigators to investigate complaints of bullying, harassment and/or sexual misconduct.

The Open Framework will run for a total of 8 years. The Open Framework will re-open at least every two years, providing new suppliers the opportunity to join the Framework or for existing Suppliers to alter their bid.

Independent Investigators will be issued investigations into eligible complaints submitted to the ICGS. Once assigned, they will be tasked with investigating the complaint and coming to a recommendation as to whether, on the balance of probabilities, the behaviour alleged in the complaint occurred and if this constitutes a breach of the definitions of bullying, harassment or sexual misconduct set out in the ICGS Policy Framework.

The Parliamentary Community is diverse and includes a complex system of oversight and management structures. For example, MPs directly employ their staff and are therefore the decision-making body for any complaints made against their staff. MPs meanwhile are elected, but any investigations into them are overseen by the Parliamentary Commissioner for Standards (PCS), and sanctions are put in place either by the PCS or by the Independent Expert Panel (IEP). The House of Commons is an employer with a HR function and so is the decision maker in all House of Commons staff administration cases. The House of Lords is an employer with a HR function and so is the decision maker in all House of Lords staff administration cases. Meanwhile, complaints about Members of the House of Lords and their staff are investigated by the Lords Commissioner for Standards, but usually with the assistance of an ICGS Independent Investigator.

A full briefing providing information about the structure of the Parliamentary Community will be provided to all Independent Investigators who are successful in joining the Framework. Investigators will also receive a comprehensive induction, and continued support throughout the investigative processes of any complaints they investigate

The independence of our investigators is vitally important to the integrity of, and confidence in, the ICGS. ICGS Independent Investigators are not employees of either House, rather they are suppliers assigned to investigate a specific complaint. While the ICGS Team provide support, guidance, and quality assure both the evidence and investigation reports we cannot direct ICGS Independent Investigators in their lines of inquiry or what their recommendation should be. We do, however, require Independent Investigators to adhere to our quality and timeliness expectations as well as our policies, procedures and published guidance. We reserve the right to remove Independent Investigators from a case should these expectations not be met. .

Outline of the ICGS Investigation Process

The ICGS Investigation process can be complex, and the ICGS Team are available for support and guidance on ensuring policies and procedures are followed. The outline below provides a simple overview of the process. Full details of the investigation process will be set out during the induction period for successful bidders, however in brief the ICGS process consists of:

Initial Assessment (IA) – Once a complaint has been made, it is assessed to ascertain eligibility. This process looks to understand whether both the Complainant and Respondent are in scope of the policy, were both members of the Parliamentary Community at the time of the alleged behaviour, whether the behaviour as described arose in connection with their ‘Parliamentary activities’ or circumstances relating to their parliamentary work, whether the complaint has already been investigated elsewhere, and whether if proven the behaviour would amount to a breach of the relevant policy. It also checks whether the complaint has been made within the relevant time limit (if applicable) and where the respondent is no longer a member of the parliamentary community if there is a worthwhile outcome. At this stage of the process the Respondent is not made aware of the complaint, and all enquiries are only between the ICGS and the Complainant or the Decision-Making Body; the purpose is simply to ascertain the Complainant’s account. In some circumstances it may be necessary at IA to preserve time-sensitive evidence (for example CCTV), which may be used if the case proceeds to Full Assessment. Preliminary enquiries may be conducted by a Case Manager or Investigation Support Officer. The final decision on eligibility will be that of the Independent Investigator. The outcome of this stage is an outcome letter which outlines the assessment of eligibility and whether it will proceed to Full Assessment.

Full Assessment (FA) – If, following Initial Assessment, the complaint is progressed to Full Assessment then the Respondent is informed either by the Decision-Making-Body or the ICGS Team that a complaint has been made against them and they are briefed of the allegations. The Independent Investigator will interview the Complainant (if they have not done so at IA), the Respondent and any Witnesses. Independent Investigators will gather (with assistance from the Case Manager or Investigation Support Officer) any relevant evidence. This may include, but is not limited to, Pass Data, CCTV footage, copies of emails/texts/social media posts and other relevant documentary evidence. The information gathered from interviews and evidence will be analysed against the thresholds in the relevant policies. The outcome of this stage is a detailed report which analyses the evidence against each allegation and comes to a recommendation as to whether, on the balance of probabilities, the behaviour happened and if it is a breach of the policy definitions.

Informal Resolution (IR)– For the avoidance of doubt, Informal Resolution does not form part of this procurement, which is a separate requirement. The paragraph below is simply intended to demonstrate ICGS processes. At any point up until the report is issued for FAC, either party can ask for Informal Resolution (IR). This must be agreed by both parties; if only one party wishes to pursue IR, it will not be possible. IR could constitute mediation, a facilitated conversation or the exchanging of written communication. The aim of IR is to resolve the matter informally and without the requirement for a full investigation. The outcomes from IR could include (but are not limited to): An apology or acknowledgement of behaviour from the respondent; an agreed behaviour contract for working together in future (in cases of bullying and harassment); a behavioural agreement (in cases of sexual misconduct); training for the complainant to help them cope and deal with any future inappropriate behaviours; respondents trained so as to avoid the possibility of causing the complainant to experience any inappropriate behaviour in the future; agreement to external mediation (in cases of bullying and harassment). The outcome of IR will either be agreement from both parties that the issue is resolved, or if either party is unsatisfied, then an investigation can resume. IR is brokered by an Independent Investigator and will be undertaken by a supplier with the relevant skills and experience.

Factual Accuracy check (FAC) – Once a draft FA report is completed and has been quality assured, the Independent Investigator will share the report with the Complainant and Respondent for a factual accuracy check (FAC). This is not an opportunity to challenge the recommendation unless it is considered to be unreasonable or perverse, but rather to comment if there are any factual errors or omissions. Once the FAC response is received, the Independent Investigator will complete a FAC addendum, considering each point raised and either make relevant changes or explain in response why they do not feel any changes are required. Should major changes be made to the report, a further quality assurance review may be required.

Completion and Outcome – Once the FAC has been completed the report, along with relevant evidence bundles, are sent to the decision-making body for a final decision on the case and any sanction. For non- Parliamentary Commissioner (PCS) cases, the Independent Investigator will also be responsible for sharing the report with the Complainant and Respondent. At this stage the Independent Investigators role in the case is over.

House of Lords cases – Note that the investigation process for complaints about Members of the House of Lords and their staff (those investigated by the Lords Commissioners for Standards) is different. ICGS Independent Investigators are there to support the Commissioner rather than lead on such cases and there is less direct involvement with the ultimate responsibility that of the Commissioner. Full details will be given during induction.

Detailed Requirements

We are looking to establish a Framework of 20 highly skilled and experienced Independent Investigators who come from a variety of backgrounds. This could include those who have investigated for the Police or other statutory or regulatory bodies, or who have conducted complex HR investigations, investigators or panel members for healthcare regulators or other relevant fields. What is vital is that they have significant demonstrable experience of investigating issues of bullying, harassment and/or sexual misconduct, including conducting interviews, gathering evidence, analysing evidence and writing high quality reports detailing their findings and recommended outcome.

We are a demand-led service and can only investigate an allegation once a formal complaint has been made by the person affected by the alleged behaviour. As a result, demand is difficult to predict and can fluctuate throughout the year.

When a complaint disclosure is received an ICGS case manager will examine the details of the disclosure and identify which core skills are required for that case. The case will be offered to the investigator who's experience scores highest against the core skills. We will contact the appropriate Independent Investigator to offer them a new case, providing an overview of the complaint. We aim to assign an Independent Investigator to a case within 1 working day of assessing that an Investigator is required. It is therefore essential that Independent Investigators respond to allocation requests promptly, and that they have the capacity to complete the entire investigation, in a timely manner.

We cannot guarantee that any individual will be offered a certain amount of work across the term of the contract. We are not bound to offer any Independent Investigator any work, and likewise an Independent Investigator is not bound to accept any work. Before accepting an investigation, an Independent Investigator should think carefully about whether they have the time available to dedicate to an investigation, which can be lengthy.

The ICGS is a high-profile scheme with significant interest from the media. We expect Independent Investigators to maintain the highest levels of confidentiality, with the ability to also impress upon service users the importance of the same, and to investigate any potential breaches of confidentiality if they occur. We also expect our Independent Investigators to always act with political impartiality and to notify us of any actual or perceived conflict of interests as they arise.

Some service users who engage with the ICGS may be vulnerable or have specific needs. We expect our Independent Investigators to deal with service users sensitively, being mindful of the challenge and difficulties of being involved in a complaint. The ICGS's work is based on Trauma Informed Principles, and we expect Independent Investigators to adhere to the key principles of trauma informed practice.

Supplier specification

An experienced and independent investigator with a strong track record of conducting complex, sensitive investigations and producing high-quality evidence-based reports.

Demonstrates sound judgement, analytical rigour and the ability to engage sensitively with vulnerable individuals using trauma-informed practice. Operates with absolute integrity, impartiality and discretion, and is able to work effectively within structured procedural and quality-assurance frameworks.

Essential criteria

- **Substantial investigative experience:** Demonstrable experience investigating complex cases involving bullying, harassment and/or sexual misconduct, including interviewing, evidence gathering and analysis.
- **High-quality analytical and report-writing skills:** Ability to assess credibility, weigh evidence, apply policy thresholds and produce clear, structured, evidence-based reports suitable for formal decision-making.
- **Trauma-informed practice:** Experience working with vulnerable individuals and applying trauma-informed approaches in interviews and case handling.
- **Professional integrity, confidentiality and impartiality:** Ability to maintain strict confidentiality, manage conflicts of interest, and operate with political neutrality and professional independence.
- **Ability to work within structured investigative frameworks:** Experience following formal procedures (e.g. investigative models, quality assurance, evidence handling, regulatory or statutory standards) and working collaboratively with case managers or oversight bodies.

Please note: The criteria listed above are not exhaustive. Additional requirements may apply, and further details are outlined within the tender documentation. Bidders should refer to the tender pack to ensure they have all necessary information.

Further Terms

Pricing (Day Rate)

The day rate payable under the Framework is £800, which may be increased by up to 2.5% when each new Framework opens

Data Protection & Security

The House is the data controller for all information related to the ICGS, with Independent Investigators acting as a data processor. This is outlined in the ICGS [Privacy Notice](#). Independent Investigators will be provided with an ICGS Email account and may be provided with relevant IT equipment to assist them in their role. The Independent Investigator must ensure they follow all relevant data protection legislation and policies to ensure all information they have access to is kept securely, and that they follow all advice and guidance issued to them by The House in ensuring their Email account and any IT equipment issued is used safely and properly.

Independent Investigators delivering the contract will have access to highly restricted parliamentary data and will therefore need to pass Parliamentary Security Vetting (PSV) procedures and be cleared to CTC level.

Contract duration and value

The Framework will last for a total of 8 years and will be re-opened every 2 years for suppliers to request to join. The ICGS reserves the right to re-open the Framework annually at its discretion if required. When the Framework reopens, suppliers already on the framework will be able to re-submit their tender to ensure it is the most up-to-date or re-submit “as-is”. There will only be a maximum of 20 spaces on the Framework, and therefore should new suppliers be successful in joining and have a higher score than an existing supplier, they will supplant them on the Framework if there is not sufficient space for both to be part of the Framework.

In addition to charging the agreed hourly rate, Independent Investigators will be eligible to claim for any out-of-pocket travel expenses, accommodation or subsistence that may be reasonably required to undertake an investigation. This must be agreed in advance with the relevant Case Manager to ensure it is necessary. Failure to do this may result in such a claim being refused. While Independent Investigators can claim for travel expenses, they are unable to claim for their time taken to travel. The majority of the work conducted by Independent Investigators can be conducted remotely from anywhere within the UK.

In the most recent financial year (2024-2025), total spend on Independent Investigators was £311,284. Budget for financial year 2025/2026 is £323,000. The estimated budget for the overall framework across 8 years is £3,313,980. Due to the different types and complexities of Investigations conducted, we cannot guarantee that Investigations will be shared out equally across suppliers, or that the value of work provided will be equal.

How to Apply

Saxton Bampfylde Ltd is acting as an employment agency advisor to the UK Parliament Independent Complaints and Grievance Scheme on this procurement.

For more information on this procurement please see the Invitation to Tender Document available on the Atamis procurement portal. You can also read through the 'ICGS Independent Investigator Framework: Tender Guide' which will provide a high-level overview of how to apply.

All Stage 1 Written Responses must be submitted via the Atamis Procurement portal by the specified deadline of **12 noon on 24 July 2026**.

Instructions to Register and Access the Documents:

1. Create an account (or log in) on the Atamis procurement portal: <https://atamis-ukparliament.my.site.com/s/Welcome>
2. Search for project "FWK4004 – ICGS Independent Investigators" and attach yourself to the opportunity.
3. Download the ITT pack and all attachments. Save a local copy for your working files.

If you experience any portal issues, contact Atamis Support:

Helpdesk Operational Hours 08:00-18:00 Monday - Friday (Excluding Public Holidays)

Phone: +44 29 2280 9277

Helpdesk: [Raise a Support Ticket](#)

In order to apply bidders also need to be registered on the Central Digital Platform (CDP), this can be done via the link below:

<https://www.gov.uk/find-tender>

When Bidders submit the PSQ (selection questionnaire) they will have to declare that they are registered on the CDP. The CDP a public portal as opposed to Atamis which is internal to Parliament.

Please Note:

Any sole trader who is listed on the Individual Insolvency Register at the time of verification will be excluded from further participation in the procurement process and will not be evaluated.

In addition, bidders must declare whether they have any unsatisfied County Court Judgments (CCJs) against them at the time of submission. The Authority reserves the right to exclude a bidder from further participation where such CCJs are identified.



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