



Ministry
of Defence

Unacceptable behaviours: progress review 2020



Review into MOD's progress implementing the recommendations from the 2019 Wigston Review

Welcome



As Secretary of State for Defence I am incredibly proud of our people. We can only achieve our goal of being one of the top

employers in the country and one of the best militaries in the world with the immense effort of our Regulars, our Reservists and our Civil Servants.

Today's Armed Forces is very different from the one I served in 30 years ago. It is more diverse, more tolerant and more professional. But, as Air Chief Marshal Wigston's 2019 Review found, Defence still has a long way to go if we're to become a truly diverse and inclusive organisation. So, one year on from the publication of the Wigston Review, I asked Danuta Gray to assess what progress was being made. Her findings show there have been some significant improvements. More people from BAME backgrounds are joining us. Diversity task forces have been set up. Policies to tackle intolerance have been tightened.

But Danuta's report also shows some attitudes within Defence remain stubbornly out of step with the values and standards expected of a modern employer. Things

must change quickly. We must rid our ranks of any prejudice that besmirches our reputation. We must ensure a zero-tolerance policy towards unacceptable behaviour. And we must improve our training, our education and our communication. Above all, we must make Defence a more welcoming environment to everyone whatever their gender, religion or background. That is why I have accepted Danuta's excellent recommendations in full.

Alongside the Chiefs of Staff, I am absolutely determined to make sure Defence now delivers. I want 21st century MOD to be a place that serves every part of its community, that makes the most of all its talents and that makes everybody who joins our ranks proud to serve. And I won't rest until we have achieved that ambition.

A handwritten signature in black ink that reads "Ben Wallace". The signature is written in a cursive, flowing style.

Rt Hon Ben Wallace MP, Secretary of State for Defence

December 2020

Foreword



I am pleased to have been asked by the Secretary of State to undertake this review of the progress Defence has made

implementing the recommendations from the 2019 Wigston Review.

Air Chief Marshal Wigston and his team drawn from across Defence produced an excellent review, even more so as it was produced at pace. Its conclusions and recommendations rightly continue to underpin this programme of work and I have sought to build on those solid foundations.

The intention and commitment of senior leaders to progress rapidly in this area is clearly visible. This work needs continuous attention, it is never 'done', to be ticked-off and set aside; strengthening and maintaining momentum will be crucial for further progress.

I could not have conducted this review without the support of Elizabeth Cameron and Laura Whyte. I would like to acknowledge the contribution from all those who participated and provided input to the review.

Whilst I am privileged to have met many excellent people across Defence who hold the highest standards, I have also heard examples of unacceptable behaviours that have had a profound impact on those affected. I hope this review will contribute to ensuring Defence remains on its trajectory of culture change and that the gains made, are sustained.

A handwritten signature in black ink, appearing to read 'Danuta Gray', written over a thin horizontal line.

Danuta Gray, Non-Executive Member of the Defence Board

December 2020

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Executive summary

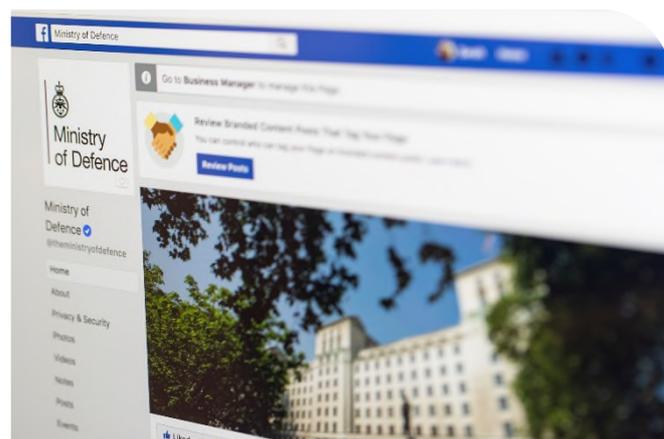
The Review into Inappropriate Behaviours was published in July 2019 setting out 36 recommendations for Defence which were accepted in full by the Secretary of State. Led by Air Chief Marshal Wigston, the review identified areas where Defence could do more, both to reduce instances of unacceptable behaviour from happening in the first-place, and to better support people when instances did happen. Culture change is at the heart of this programme which must be driven by leadership at all levels.

Unacceptable behaviours cover a spectrum from conduct that is unlawful to that which is inconsistent with Defence core values. It includes all criminal and disciplinary behaviour, for example sexual and violent offences, as well as bullying, harassment, discrimination (BHD).

This report provides an assessment of progress one-year on from the publication of the Wigston Review. It focuses on work undertaken in the single Services, UK Strategic Command (UKStratCom) and in Head Office.

Good progress has been made implementing the recommendations across Defence. The pace of delivery was initially slower than desired in some areas due to a range of factors, including complexity, resourcing, the requirement for further discovery work and wide engagement.

The Covid-19 pandemic affected implementation and work was officially paused on 23 March 2020 for three months. This helped allievate pressure on Defence enabling personnel to focus on supporting the Covid response. This report does not therefore reflect a full year's work. Culture change is a long-term process, the Wigston Review estimated it would take about 5-10



years of activity to bring about meaningful change.

The black lives matter movement had an impact on the consciousness of personnel in Defence and brought additional momentum to advancing the Department's extensive diversity and inclusion (D&I) work. The national debate on race and racism not only highlighted the lived experience of colleagues from black and minority ethnic groups, but brought to the fore some attitudes within Defence that are out of step with its values, standards and the expectations of a modern and inclusive employer.

Senior leaders have participated in a number of face-to-face meetings over the past year to hear the lived experience of a range of minority groups in Defence. Hearing these stories directly had a profound impact on senior leaders and in part, helped to shape the Chiefs' Commitments to maximising everyone's talent (in Annex C). The wider work in Defence to increase diversity and change culture should also be recognised. The Chiefs and the Executive Leadership team of the Department are driving meaningful change to ensure culture, career opportunities, flexible terms, processes to

recruit, retain and develop people all ensure Defence can attract the widest and most diverse talent to meet future skills needs.

This report identifies areas where work could be prioritised and accelerated in implementing the original recommendations made by Wigston to drive the desired outcomes in Defence. It recognises that even where recommendations are marked as implemented, there is always room to advance and improve. This programme of work can not afford to drift, or rely on the personalities of the current group of senior leaders; Defence must ensure this work is fully embedded, sustainable, and remains a priority.

This report recommends the following actions as Defence continues implementation. The majority build on those in the Wigston Review, new recommendations are indicated in yellow.

Recommendation 1: Build awareness of the lived experience through experience sharing and training. Ensure this is included as part of the current ongoing training review. The challenge for Defence will be how it can bring the reality of the lived experience to life for everyone, and especially those in leadership roles. Understanding the impact of unacceptable behaviours has profoundly affected a number of senior leaders. It is still clear that some people within Defence do not see the need for change, lived experience sharing and training may assist in changing this view.

Recommendation 2: Take a holistic approach to target training and education interventions. Incorporate the findings of climate assessments and other sources of data which may indicate areas requiring culture change. The importance of the quality and effectiveness of training and education to support behaviour change can not be over emphasised. It should be mainstreamed into training at each key

career stage. In addition to the annual mandatory training delivered, further training must be delivered where it is most needed, including utilising third-party professionals.

Recommendation 3: Make active bystander training mandatory across the whole force. The new active bystander online module has received positive feedback since its launch in July 2020 and unit D&I Practitioners will be trained to deliver it face-to-face. Implementation plans already being executed in the Armed Forces, should ensure availability for the whole force and ensure quality is maintained as it is rolled-out further.

Recommendation 4: Provide a service readily available to inexperienced leaders to provide advice about dealing with unacceptable behaviours. Cases involving unacceptable behaviour can be complex and difficult for inexperienced leaders, which can lead to uncertain handling and delay. Providing them with ready access to guidance provided by trained people should lead to earlier resolution and better outcomes.

Recommendation 5: Improve internal communications on unacceptable behaviours to ensure that they reach every level of the organisation from the most senior to the most junior. A more effective systematic and consistent approach to internal communications must be developed. Service Chiefs should take responsibility for ensuring communications reach right through their organisations. A new D&I Directorate in the Chief of Defence People's (CDP's) area should review best practice culture change communications, underpinned by support from Government Communications experts, and deploy this within Defence, providing advice as needed.

Recommendation 6: Communicate both the consequences for unacceptable behaviour and actions taken in response to complaints. The application of consequences for unacceptable behaviours is currently not sufficiently visible for people to have confidence that action will be taken if they raise an issue. Visible action should be taken and consequences need to drive the right kind of behaviour change.

Recommendation 7: Embed targets and commitments into the Defence Plan. Align objectives throughout the organisation. Steps to implement the Chiefs' Commitments and targets should be integrated into senior leaders' objectives and cascaded down into the objectives of others. A clear plan with milestones is required. Performance against progress must be measured, through both the performance and risk reporting (P&RR) process and through individuals' appraisals.

Recommendation 8: Adequate resourcing, including to deliver the recommendations here, should be provided. The uplift in posts in the central D&I team will support this, however resourcing in the single Services, UKStratCom and other parts of Defence should be considered including the trend of 'gapped' posts.

Recommendation 9: Increase best practice sharing across the organisation, both utilising the new D&I Directorate and Non-Executive Directors (NEDs). A new D&I Directorate should spread and encourage best practice across Defence. There is also a role for single Service NEDs to ensure best practice from within the private sector is shared and understood.

Recommendation 10: Consider user-feedback in finalising changes to the Service Complaints system. The review team should consider consulting those who have experienced unacceptable behaviours

in the improvement of the people-focused elements of the system. Their experience of both reporting, or being reluctant to report issues, will provide direct feedback on the changed process from the perspective of a potential complainant.

Recommendation 11: Set the framework and principles for training outcomes, climate assessments and the gathering of MI including through surveys. Continue efforts to improve data and identify trends, digitising D&I Adviser logs and introducing climate assessments for all. This will encourage a pan-Defence approach driven from CDP's area of responsibility. CDP should consider the need for one whole force survey on behaviours, raising complaints and D&I issues.

Recommendation 12: Develop a more sophisticated approach to understanding the effectiveness of programmes run in Defence. There are a wide range of initiatives ongoing across Defence, but understanding the volume of activity is not enough. A more sophisticated approach is needed to measure effectiveness.

Recommendation 13: Embed 180-degree feedback mechanisms into military careers. Rolling out the recently completed trial of 180-degree feedback leadership tool across the Armed Forces will help to develop self-aware leaders. It should be incorporated into appraisals, development planning and promotion boards. Leaders must be held accountable for the environment in their area of responsibility.

Approach to implementation

Background

The Wigston Review was commissioned in April 2019 by the then Secretary of State, Rt Hon Gavin Williamson MP, following repeated allegations of unacceptable and unlawful behaviour by serving members of the Armed Forces. Led by Air Chief Marshal Wigston and a pan-Defence team, it worked at pace to deliver a comprehensive report outlining 36 recommendations to reduce instances of unacceptable behaviour and better support people when instances occurred.

The Wigston Review highlighted that culture change would be necessary requiring authentic leadership, relentless engagement and consistent communication. The recommendations were accepted in full by the then Secretary of State, Rt Hon Penny Mordaunt MP, and published in July 2019.

In June 2020, the Secretary of State asked Danuta Gray, as a Non-Executive member of the Defence Board and Chair of the People Committee, to conduct a one-year on review to assess progress. Terms of Reference are included at Annex A.

Initial implementation

Following the acceptance of the recommendations, work began to establish a central team which became known as the Wigston Review Implementation Team (WRIT). Situated in CDP's area, under the Civilian HR Director, it used existing resource primarily from the Civilian HR Directorate with one post provided by the RAF. The WRIT team was in place by October 2019.



At the same time, a new team was created bringing together those working on Service Complaints and Service Justice Transformation. Also situated in CDP's area under the Armed Forces People Policy Director, this was in place by September 2019.

Across the single Services and within UKStratCom, resource was allocated generally from existing Diversity and Inclusion teams, drawing-in other colleagues from teams such as Service Complaints. Personnel or Legal branches as necessary.

A 1*/Deputy Director led Project Board was convened in December 2019 with representatives drawn from across Defence. This met on a monthly basis and was co-chaired by the Head of WRIT and the Head of Service Complaints and Justice Transformation.

The Project Board proposed that the terminology used in the Wigston Review should be tightened from 'inappropriate behaviour' to 'unacceptable behaviour' to remove any doubt about how these behaviours are interpreted. This change was endorsed by the Defence People

Leadership Team and is reflected in the title of this report.

Of the 36 recommendations, some required central ownership whilst others could be implemented locally by the single Services, UKStratCom and Head Office. This also reflected the different starting points and existing initiatives in place across the whole force. The ownership of recommendations was agreed through the Project Board and is reflected in Annex D. The double-hatted role of Head Office, in terms of both delivery and as the central policy owners in many areas, is reflected within the Annex.

Covid impact

At Ministerial direction, the Wigston implementation work was paused on 23 March 2020 for three months to enable the Armed Forces to prioritise supporting the Covid response. Work continued in the central teams and in part within the single Services and UKStratCom where resource remained. Work officially restarted at the end of June with the Project Board meeting again on the 15 July.

Re-energised momentum

The black lives matter movement sparked protests and a national debate in the UK about racism.

During this period, one of the regular Defence all-staff calls was dedicated to a discussion on race. This discussion not only enabled personnel within Defence from black and ethnic minority backgrounds to share their lived experience, but it also revealed attitudes, which the Permanent Secretary confirmed, have no place in Defence. The strong sense of feeling about the urgent need for Defence to make further progress, both on improving its diversity as well as changing culture and behaviour, led to additional momentum and energy to bring about change. The Chiefs' Statement of Commitment issued in July 2020 set out bold changes which built on the Wigston



Review and are an important signal of intent by senior leaders to change the culture in Defence.

In July 2020, the one-year anniversary of publishing the Wigston Review was used to continue the debate on culture change. A further all-staff dial-in highlighted progress by announcing updated policy, new training opportunities and the launch of a whole-force bullying, harassment and discrimination helpline.

Resourcing

The Wigston Review did not detail how work should be resourced. As outlined above, it was largely provided from existing resources.

During this period, several posts in the Royal Navy D&I team were vacant or 'gapped' and Covid work impacted the Army D&I team capacity. This necessarily had an impact on the capacity of stretched teams to deliver and engage. Service Complaints teams across the Services have also been stretched.

Alongside the central increase in CDP's D&I team resources, all single Services and UKStratCom have, or are now, increasing the size of teams focused on this work. In each of the single Services, the work to implement Wigston recommendations is now incorporated into wider people and culture transformation programmes.

The Royal Navy are establishing a D&I Taskforce who will report to the Second Sea Lord and a Conduct and Culture team advising the First Sea Lord through the Fleet Commander.

Central funding was allocated to some initiatives, such as the development of the Active Bystander Training module and BHD helpline. There was also an expectation on the single Services and UKStratCom to fund activities, such as third-party training or sexual harassment surveys.

Complexity

The complexity of Defence, with multiple organisations comprising around 250,000 people, is a factor in realising cultural change. Extensive engagement across the whole organisation has been required to implement Wigston recommendations. In places, this identified that further discovery work was needed, for example in order to execute the recommendations related to

training. This has in some circumstances led to a lengthier delivery of outcomes.

Implementation has not been without challenge. The pace at which recommendations were initially implemented, was slower than expected, due to issues with allocation of responsibility and resourcing. Whilst there are a range of explanatory factors to consider, there was a noticeable shift in momentum from Summer 2020.

At the same time as implementing the Wigston recommendations, broader transformation programmes are underway within the single Services and within Head Office. These all recognise people as a crucial component and are therefore closely tied to progress on reducing unacceptable behaviour and creating an inclusive environment where everyone can excel. The different programmes have entailed a variety of approaches and timelines linked in to Wigston implementation work.

Progress assessment

Introduction

This review has considered a range of evidence to assess the progress that has been made implementing the original recommendations, the methodology is outlined in Annex B.

The recommendations can be broadly grouped into the following themes: training; policy; communications; management information (MI) and leadership. There is of course some overlap between categories. The following sections provide a summary of overall progress in those areas. A detailed breakdown of recommendations and progress per implementing organisation is provided in Annex D.

Some recommendations have been owned and driven from the centre by Head Office with engagement from across Defence. The allocation of responsibility for implementing recommendations has been appropriate.

Training

Many of the recommendations related to training and education as a means to prevent unacceptable behaviours from occurring and to build an inclusive culture. A wide-variety of training in the diversity, inclusion and behaviour space is available. In addition to annual mandatory training on values and standards within the Armed Forces, it is woven into a variety of career progression and leadership courses.

All Services mandate culture and behaviour training for new recruits in phase one training. Mandatory training in the single Services has been updated (recommendation 1.11). The Royal Navy updated its mandatory training 'Be the Change' in 2019. This has introduced immersive, behaviour focused aspects to



drive behavioural change. Third-party expertise was used to develop the package. Royal Navy recruits receive a simplified version of 'Be the Change' in their first few weeks of Service and thereafter every 2 years.

The Army established a working group to redesign its mandatory training, known as 'MATT 6' and is merging together D&I with values and standards training into a behaviour package. Part two is a virtual 'bookshelf' from which every individual must complete at least one training intervention each year, this includes an immersive game called 'Dilemma'. This new package was launched in September 2020 during National Inclusion Week.

RAF mandatory training, known as 'Face It, Fix It', has also been updated to incorporate active bystander principles and to make increased use of immersive training tools and techniques. This package will be rolled out by April 2021. UKStratCom has promoted mandatory training and incorporated it into their refreshed induction package.

Mandatory training for civil servants, which is available to all Defence personnel, was updated in August 2019. This online module

called 'D&I fundamentals' helps personnel to:

- Understand current Defence D&I strategy, policies, initiatives and benefits in order to promote a whole force inclusive working environment; and
- Have an awareness of D&I issues and where to go for further support and help in relation to raising complaints relating to BHD and/or abuse.

Recognising the complexity of the training landscape across Defence, the WRIT conducted an initial training audit. It subsequently brought in an education and training specialist to develop a pan-Defence Training Needs Analysis and Assurance framework. It is expected that the Services will conclude internal reviews of training objectives against their existing provision at the start of 2021. This will identify where immersive training can be maximised (recommendation 1.12).

The single Services and UKStratCom have made opportunities available for civil servants to participate in relevant trainings on behaviours and D&I (recommendation 1.15).

The continued use of third-party training expertise is evident in some parts of Defence (recommendation 2.3). In the Army, funding to sustain the delivery of the Garnett Foundation 'Respect for Others' training is in place until 2022.

Future demand for third-party training can be further assessed following the training review. Long-term funding and sustainability should be considered to ensure that it is not just a minority who get to benefit from third-party expertise.

The importance of high quality instructors and those delivering D&I training at local levels has been continually raised during

Training recommendations

- 1.11 Mandated diversity, inclusion and values training must be prioritised, irrespective of rank.
- 1.12 Maximise use of immersive values-based training across Defence.
- 1.15 Increase group-based training opportunities for civil servants, especially in military events appropriate to the whole force.
- 2.2 All recruits should receive immersive culture and behaviour training at the start of service and continued at regular intervals through their career.
- 2.3 Use of third-party training expertise is considered leading practice and should be resourced and exploited across Defence.
- 2.4 Investigate, develop and implement appropriate bystander training across Defence.
- 2.6 Single Services must sustain and protect their investment in high quality instructors and instruction at initial training.
- 2.7 Induction and collective training opportunities for MOD civil servants must be reviewed, resourced and improved.
- 2.8 Defence social media policy and training should focus equally on the avoidance of inappropriate behaviours as well as the security implications of online activity.

this review (recommendation 2.6). The Royal Navy are considering selecting only instructors for training environments who are rated in the top third of their ranks and trade. The Army is maintaining instructor priority through the Manning Priorities Committee

and selects instructors via the Army Personnel Centre. The RAF is considering an 'Instructor of the Year' award. UKStratCom are considering how to further diversify the range of people working as instructors at the Defence Academy.

Active bystander training that equips people with the skills and techniques to intervene safely and effectively when they witness or hear about unacceptable behaviour has been developed (recommendation 2.4). A three-pillared approach to implementing the training across the Armed Forces has been adopted:

- Pillar 1 – mandated for new recruits and those being promoted. This covers basic training (Phases 1 and 2) and career progression courses;
- Pillar 2 – optional for personnel through an online course accessible by individuals or as part of a group training event; and
- Pillar 3 – mandated for all personnel by including active bystander principles into annual mandatory training, delivered face-to-face locally by D&I Practitioners.

A one-hour online active bystander fundamentals course was developed and went live in July 2020. More than 10,000 people had completed the training as of 6 October 2020. This has routinely received positive feedback in the course of this review from focus group participants and senior leaders. A survey conducted for this review demonstrated that 49 per cent of respondents were aware of this training, and given it was launched in July 2020, this is a positive indicator. To ensure the training is sustainable and readily available to all people throughout Defence, Terms of Reference for D&I Practitioners were amended to include the requirement to deliver the training locally. Work is underway to develop a 'train the trainers' module by the Defence Leadership Centre.

Consideration is being given to making the course mandatory for civilians. Some areas of Defence, such as within UKStratCom and Defence Fraud, have already directed staff to complete the training and D&I Advisers in Head Office have facilitated it locally.

Social media training (recommendation 2.8) is also being considered as part of the training review. Current MOD-wide guidance on social media and online engagement is outdated. It is welcome that both the Army and RAF have updated their social media policies and that aspects will be incorporated into the revised Joint Service Publication (JSP) 763 when it is published in April 2021.

Work continues to improve the induction experience for civil servants across MOD regardless of where they are based (recommendation 2.7). A new support pack for both new joiners and line managers is due to be rolled-out by the end of 2020. Further work may be needed to improve the quality of inductions for civil servants.

Policy

Recommendations in the policy space are wide ranging with many interdependencies.

Several of the recommendations related to the Service Complaints and Service Justice system. Suggested reforms to the Service Complaints system have been considered over the past year and proposals are nearing completion.

Consideration was given to recommendation 1.2, however the Ministry of Justice advised that current systems do not record if someone is a Serviceperson, and therefore information cannot easily be shared from the Civilian Justice System.

Consideration was also given to expanding access for civilians to the Service Complaints system (recommendation 3.9). MOD did not pursue this option as policy revisions to complaints processes (within

JSP 831, JSP 763 and the civilian grievance policy) are underway with an emphasis on how to make the systems work better together, so the affiliation of the parties involved does not affect redress.

Proposals for wider Service Complaints system reform have been proposed to the Service Chiefs and the Department's Executive Committee (recommendations 3.8 and 3.10). Some of the changes will require legislative change which is unlikely to occur before summer 2021. At this stage it is not intended to create a central MOD team to handle all Service Complaints of unacceptable behaviour, or implement a two-tier complaints system. The proposed changes should improve the way in which all complaints are handled, including those that

relate to BHD. The changes include creating centralised functions within each of the single Services to look at admissibility decisions, the establishment of standing Decision Bodies which contain subject matter experts relevant to the type of complaint being decided, and empowering Commanding Officers to resolve minor awards.

Work is also underway to improve BHD investigations. A new approach is currently being developed which will see investigators professionally trained to industry standards. This will move away from a freelance fee-earning model and enable a maximum 12-week turnaround period. Performance will be benchmarked against the Home Office who operate a similar investigations

Policy recommendations

- 1.2 Defence should consider amending primary legislation to require the sharing of information from the civilian Criminal Justice System.
- 1.6 Revise Joint Service Publication (JSP) 763 (MOD Bullying and Harassment Complaints Procedures) as a policy priority.
- 1.9 Climate assessments and advisory visits should be sustained and exploited across Defence.
- 1.16 Defence should investigate the synergy between EDIA and Speak Safe approaches to share best practice and ensure we are making best use of the available resources.
- 3.5 Defence should review and improve the provision of support offered to all parties, including appropriate training for Assisting Officers.
- 3.6 Defence should resource, train and deliver an effective, certified and professional mediation service, recognising and addressing the potential risks of mediation identified by the Service Complaints Ombudsman.
- 3.7 Establish a Defence Authority responsible for cultures and inappropriate behaviours.
- 3.8 Allocate the responsibility for the reporting and handling of all serious behavioural complaints to the Defence Authority, based on an agreed threshold and including anonymous and bystander reporting.
- 3.9 Consideration be given to amending primary legislation to allow civil servants to raise a grievance through the Service Complaints system.
- 3.10 Implement a two-tier complaints system, reserving the full scope of the current system for the most complex cases including bullying, harassment and discrimination.

process. This is a welcome development which not only professionalises the quality of investigations, but speeds up redress for all parties to a complaint – be they civilian or a Serviceperson.

This has the potential to make a significant difference in enabling faster resolution. These areas of work will speed-up the time taken to resolve complaints, ensure consistency in approach, and should improve the experience for both complainants and respondents.

In finalising changes to the Service Complaints process, the review team should consider testing the proposals with a group of those who have experienced unacceptable behaviours. Their experience of both reporting, or being reluctant to report issues, will provide direct feedback on the changed process from the perspective of a potential complainant.

A further planned change will ensure that all personnel have early access to an Assisting Officer to support and advise them before making a complaint. This will better support people through the complaints process. Further training for Assisting Officers will be reviewed as part of a Training Needs Analysis for the Service Complaints system given the proposed reforms and should be fully resourced (recommendation 3.5).

Work is also underway to mature Service Complaints data capture to enable an understanding of where an individual registered and experienced the subject of their complaint. This work will help ensure targeted interventions can be implemented across Defence in any particular hotspots.

The decision to establish a Defence Authority for culture and behaviours (recommendation 3.7) was initially postponed until progress implementing the recommendations had been made to assess the resourcing requirements and function of such a team. In June 2020, a decision to



uplift the central D&I team by 19 posts (including two for the WRIT) and establish a new D&I Directorate in CDP's area was taken. The role of this new Directorate will include both Wigston implementation work and Service Complaints. It will, in effect, also fulfil the function of a central Authority. A new Directorate should not only track progress against Wigston recommendations but also ensure best practice is shared across Defence. This team should also have a role in defining, collating and analysing data as well as supporting D&I teams across Defence.

A Defence Instruction Notice (DIN) entitled 'Understanding Unacceptable Behaviour' was issued in July 2020. This was issued as an interim measure whilst JSP 763 continues to be updated and will eventually be subsumed into the JSP (recommendation 1.6). This provides people in Defence with updated definitions of unacceptable behaviour and Defence specific examples. It also raises awareness of how to access support and report incidents of unacceptable behaviour.

Revising JSP 763 is a substantial piece of work requiring pan-Defence engagement. Proposed reforms to JSP 763 were welcomed by the Service Complaints Ombudsman for the Armed Forces (SCOAF) in her annual report. Concurrently, the reforms will also see a revised policy on Service Complaints in JSP 831 and a new civilian grievance policy. JSP 887 on

Diversity and Inclusion will be merged into the new JSP 763. Furthermore, the new JSP will have a section on prevention and clearly outline the requirements on organisations across Defence in a variety of areas, including for example, in conducting climate assessments. The JSP will include a section on positive behaviours linked to values and standards. This should also outline the positive behaviours expected from personnel dealing with incidents of unacceptable behaviour. Where incidents are handled well, it may encourage personnel to raise complaints. It is anticipated that the new JSP 763 will be published April 2021.

Work continues to improve the use of climate assessments across Defence largely utilising the Army approach (recommendation 1.9). The Army have reviewed their processes to make improvements and work has commenced on developing a maturity model to assess culture. The Army maturity model for measuring culture within units is currently undergoing a pilot in five units as part of wider Army organisational culture work. This seeks to reduce occurrences of safety and security incidents and well as reduce incidents of unacceptable behaviour by positively changing the culture.

The Royal Navy have conducted Advisory visits for the last six years. This process is currently being reviewed to become a formal tiered climate assessment which will provide a better understanding of the climate and culture in the organisation to enable behaviour change. Whilst organisational structure and complaints management will continue to be assured, the collection of climate data from Unit personnel will be incorporated. This will be used to identify areas to be addressed, focus groups will be introduced to measure the lived experience, and Commanding Officers will be held to account for implementing identified culture change. This is being trialled in late 2020

and following a review, will be rolled-out in March 2021.

The climate assessment process within the RAF is currently under review with a view to building on the Army approach. The RAF will set-up a central climate assessment capability within the Air D&I Team. This will replace current local unit-based climate assessments by centrally controlled, independently conducted climate assessments to better support Commanding Officers / Heads of Establishment and inform their unit D&I Action Plans.

UKStratCom has issued climate assessment guidance for joint units.

To ensure a whole force approach which can also assist with recommendation 1.1 on improving metadata, it is recommended that climate assessments are conducted universally, including for civilians, that are aligned to a common set of questions, with room for local adjustment. This will enable comparisons and analysis across the whole force. Anonymised data should be provided centrally to CDP's team.

It will be important to ensure Commanding Officers (COs) or Directors are accountable for improving the cultural climate in their area of responsibility. In addition, climate assessments should highlight positive examples of excellent leadership and practice that can be harnessed and shared for use in training and development.

Mediation services (recommendation 3.6) continue to be available to all personnel in Defence. The Royal Navy and RAF draw on a centrally-let contract for professional mediation. Defence Business Services provide a mediation service for civilians. The Army continue to offer their mediation service which is taking on an increased caseload and maintains a 97 per cent success rate of mutually agreed satisfactory resolution.

Diversity and Inclusion Advisers (previously known as EDIAs) and Practitioners have been operational in Defence for some time, primarily in the Armed Forces. These are trained individuals who provide support and advice to people in relation to issues with unacceptable behaviours, D&I and the complaints process. They also support leaders in monitoring climate and in developing local D&I action plans.

The Terms of Reference for D&I Advisers and Practitioners have been amended to clearly extend coverage to civilians. A Head Office D&I Adviser forum, formed of civilians who have undergone, or are shortly to undergo, training was established in April 2020. Defence is now taking steps to ensure everyone in Defence has access to a D&I Adviser or Practitioner. To take a whole force approach, Speak Safe volunteers will also be encouraged to train as D&I Practitioners (recommendation 1.16).

Communications

The Wigston Review noted the importance of internal communications. Culture change requires constant and effective internal communications.

This review found that internal communications on Wigston and unacceptable behaviours had been inconsistent. A significant number of those surveyed and interviewed in focus groups had not heard of the Wigston Review. A reliance was placed on cascaded communications through the chain of command.

A MOD all staff dial-in during July 2020 showed that of the 903 people on the call, 55 per cent had not previously heard of the Wigston Review. The survey conducted for this review also found that 64 per cent of respondents had heard of it, 31 per cent had not and 5 per cent were unsure.

Whilst each of the Services, UKStratCom and Head Office have embedded Wigston

Communications recommendations

- 1.10 Single Service values and standards should be sustained but communication of the Civil Service Code should be amplified.
- 2.9 Communication on behaviours must be consistent and persistent. How we deal with inappropriate behaviour must be transparent, including the appropriate publication of outcomes.
- 3.3 Implement a clear, simple and enduring communications campaign to articulate the range and scope of inappropriate behaviours, and what to do when instances occur.

activities into their communications plans, much more needs to be done to ensure communications on behaviours are 'consistent and persistent' (recommendation 2.9).

Rather than a regular drum-beat of communications, or a proactive campaign in support of culture change, efforts to deliver ad-hoc communications have often been tied into leadership events and diversity 'days'.

More recently, strong messages have been sent out from senior leaders, notably the Chiefs' Commitments, all-staff calls hosted by the Permanent Under Secretary (PUS) and Chief of Defence Staff (CDS), Lt Gen Urch's open letter on tackling racism, and a personal statement from the Comd UKStratCom. In addition, the Chief of the Air Staff has consistently highlighted the importance of dealing with unacceptable behaviours and changing culture at many events in the RAF, including launching Black History Month and with Women in Defence.

UKStratCom have also launched 'Command Spotlight Awards' which celebrate those living the Command's values and behaviours.

Proactive communications were used to raise awareness of specific deliverables from Head Office including the launch of the bullying, harassment and discrimination helpline, the availability of active bystander training and the DIN. A leaflet on sexual harassment based on the DIN, was created to be more people friendly and engaging (recommendation 3.3).

A range of communications channels are used in common by all the Services, UKStratCom and Head Office which include newsletters, dial-ins, blogs and discussions with Diversity networks and champions. It is worth highlighting in addition that:

- The Royal Navy have utilised 60 second updates and their MyNavy app to cascade information. Unit level discussion groups are used to share lived experience;
- The Army is now planning a campaign approach to improve communications, resourcing and engagement;
- The RAF's newly launched gender network has run a series of popular events engaging with personnel across the organisation and they launched a 'My RAF' app in September 2020;
- UKStratCom continue to implement their new Command Charter values and behaviours across policies and processes to drive culture change; and
- Head Office have created a series of animated videos called 'policy bites' to clearly explain policies; these include videos on BHD and sexual harassment.

Cascading information through the organisation, particularly to those in the

ranks who do not routinely access IT has been a challenge. Leadership at every level is vital to cascade information. Defence has the structures in place – but the message is not getting through the chain of command / line management chain universally.

Further efforts to publicise the BHD helpline within the single Services is required. Whilst information has been provided on Defence Connect and the MOD.gov.uk wellbeing page, details of the contact number have not been added to the Services public websites on the wellbeing pages. On internal intranet pages, the details currently only appear on the front page of the RAF intranet page and on Defnet. The Army, in contrast to other Services, have not promoted the helpline on social media, however they plan to communicate it widely during Anti-bullying Week in November 2020.

Communications on the consequences for unacceptable behaviours are not widespread. Whilst court martial outcomes are published, the consequences for less serious issues have not been routinely shared.

The single Services have continued to communicate their values and standards (recommendation 1.10). The RAF Ethos, core values and standards was refreshed in October 2019.

The Civil Service Code has been highlighted in the new DIN on 'Understanding unacceptable behaviour' and it will become part of the new induction pack for civil servants.

Management information

Efforts have been made to improve the availability and quality of metadata (recommendation 1.1) including:

- Plans to digitise the monthly D&I Adviser summary logs to provide monthly climate data and identify trends;
- Reviewing relevant BHD questions in AFCAS and including an optional sexual harassment question;
- Working to professionalise and standardise climate assessments on a pan-Defence basis;
- Conducting sexual harassment surveys
- Consideration of a 'satisfaction survey' for those involved in the Service Complaints system;
- Aligning elements of the above to the Civil Service People Survey where possible and appropriate; and
- Ensuring relevant MI is available through the BHD helpline and from the Employee Assistance Programme.

Progress against improving data has been challenging, due to a range of factors including:

- The manual nature of data systems in Defence, including paper based systems and outdated software which makes tracking cases difficult and time-consuming;
- Delays to collating information centrally; and
- Lengthy processes and delays, for example, to amend AFCAS questions, or create digital process solutions.

The SCOAF has also recognised the challenges with data and the current systems in use which makes it difficult to drill down into experiences of BHD and make comparisons between Services.

MI is central to be able to understand the prevalence of unacceptable behaviours, to understand how and where they are being

Management information

- 1.1 Defence must improve the level of detail and metadata captured on serious unacceptable behaviour as well as instances of lower severity, to provide a single comprehensive picture of inappropriate behaviours across the organisation.
- 1.3 Defence should develop performance measures relating to inappropriate behaviours for use at Defence Board, Executive Committee and Performance and Risk Reviews.
- 1.4 Defence should conduct a harassment survey in 2021 building on the Army Sexual Harassment Survey 2018, informed by an independent advisory group.
- 1.5 Defence should better coordinate and focus the bullying, harassment and discrimination elements of continuous attitude surveys to improve understanding, reduce duplication and streamline data analysis. Use of contemporary, on-line survey formats should also be considered.
- 1.13 Defence should investigate causes of overrepresentation of minority groups, women and junior ranks in the complaints process and implement the necessary training interventions as part of an overarching strategy to address the issue.
- 2.5 Consideration should be given to gathering additional values, attitudes and standards information on new recruits to assess the risk and tailor preventative training.
- 3.1 In line with recommendation 1.4, Defence should consider a 'call for evidence' on inappropriate behaviours in conjunction with a sexual harassment survey in 2021.

reported and to adjust interventions. Useful MI will enable richer conversations at boards and in P&RR processes.

More specifically on the sexual harassment surveys (recommendation 1.4), the Army will be publishing results in 2021 and the RAF survey will commence in November 2020. Lack of resource has prevented the Royal Navy from implementing a survey this year. MOD Head Office will implement a survey for civilians in 2021 and take responsibility for a 2023 pan-Defence sexual harassment survey.

On recommendation 3.1 regarding a call for evidence, MOD will first consider the issues raised in the 2021 sexual harassment surveys, in conjunction with MI from the recently launched helpline and AFCAS, which now includes a sexual harassment question. This prioritised approach reflects an intent to focus on present issues and future prevention rather than looking retrospectively.

It is understood that the House of Commons Defence Committee sub-committee will also be starting an inquiry looking at Servicewomen's experiences. The Secretary of State has granted permission for serving Service personnel and civilian employees to submit written anonymous evidence to the sub-committee. This is welcome and closely aligns to the intention of recommendation 3.1.

During the course of this review, former Service personnel and external organisations made contact to share their perspective and experiences. Due to the nature of this review, being internally focused on progress in the last year, wider engagement has not been practical. The HCDC sub-committee inquiry may offer an opportunity, and MOD should consider wider consultation in the future on progress.

An additional question on sexual harassment has been added to AFCAS

(recommendation 1.5). Further alignment to the questions in the Civil Service People Survey has been discussed by the Analysis Function, but ultimately not yet adopted, due to technicalities around the methodology and purpose of AFCAS as an attitudinal survey.

AFCAS is an inadequate vehicle to understand in more depth issues in relation to unacceptable behaviour and reporting. Inadequacies include the sampling methodology, the size of the sample and that the survey is not undertaken on a whole force basis. CDP should give consideration to developing one survey, for everyone in Defence, on behaviours and D&I issues.

A set of metrics were agreed by the Wigston Implementation Project Board in January 2020, and subsequently included in the Defence Plan. These will be used to assess progress through quarterly P&RR processes (recommendation 1.3). This will ultimately give an indication of the collective effect of interventions.

Further work is underway to validate and assure programmes as part of the ongoing training review which will enable a better understanding of their impact (recommendation 1.14 in the next section).

In addition, each area of Defence has developed their levels of ambition for D&I, including targets to address BHD. These targets will be used to hold to account leaders in Defence for delivering the policy, process, cultural and behavioural changes required, monitored through the P&RR process. An annual Defence D&I report will be published in early summer 2021.

An academic study commissioned by Head Office was initially considered by the Project Board to address recommendation 2.5 regarding the attitudes and values of new recruits. Funding has been requested for work to address this in 2021.

Work has been commissioned to build on the 'Lived Experience' research conducted in 2019 about the experiences of women and black and minority ethnic personnel (BAME) in Defence. This will analyse data to explore their over-representation as complainants in the Service Complaints system and is due to report in early 2021 (recommendation 1.13). Whilst this work is being led by the centre, within the RAF, Occupational Psychologists are also conducting a survey amongst all personnel who have made a Service Complaint in the last three years. The RAF have also appointed a NED to review BHD cases since 2016 and to look into the over-representation of women and BAME personnel as complainants in the Service Complaints system.

Leadership

Immediate steps were taken to appoint a MOD Senior Responsible Officer (SRO) with CDP fulfilling the role (recommendation 1.7). The single Services and UKStratCom have also appointed SROs, fulfilled by the Principal Personnel Officers in the Army, RAF and UKStratCom, and in the Royal Navy by the Director for People and Training.

Boards now include culture and behaviours as a standing item owned by single executive owners (recommendation 1.8). Some single Service / UKStratcom Non-Executive Directors (NEDs) reflected that further conversations about the Wigston Review and unacceptable behaviours would be welcome. The RAF have created a sub-committee of their board chaired by one of the NEDs to oversee Wigston implementation. Within Head Office, this is considered at the Head Office Management Board and the single executive owner is MOD's Chief Operating Officer.

The set of metrics agreed for P&RR processes (as outlined in the above section) will ultimately provide an indication of the

Leadership recommendations

- 1.7 Establish a MOD focal point – a Senior Responsible Owner – to own, track and inform Defence culture and behaviours.
- 1.8 Defence and single Service Boards should include culture and behaviours as a standing agenda item, with a single executive owner held to account by non-executive directors or audit committees.
- 1.14 Defence should develop a process for measuring the impact of culture and behaviours training programmes.
- 1.17 The resource and priority afforded to Intrinsic Leadership and Behaviours at the Defence Leadership Centre should be adjusted to meet the demands of the three Services and the Civil Service.
- 2.1 Services sustain and promote connected leadership in their training and preparation of leaders. Feedback mechanisms such as reverse mentors, focus groups and 360° reporting are leading practice and should be maximised.
- 3.2 Resource, develop and implement an anonymous tool for reporting inappropriate behaviours across Defence.
- 3.4 Establish an inappropriate behaviours helpline for all Defence personnel.

collective effect of interventions (recommendation 1.14). Further work is underway to validate and assure training programmes as part of the ongoing training review which will enable a better understanding of the impact of the wide variety of training programmes. It is difficult to differentiate the impact of training programmes from other culture change initiatives ongoing in Defence. It is essential that Defence ensures the quality of training programmes.

Leaders in Defence, especially those at OF4/5 levels, must also get comfortable that success in the near future may look like 'bad news'. Having higher numbers of people reporting will indicate success in building trust in the system and a belief that issues will be taken seriously.

The Covid-19 pandemic has affected training (notably D&I Adviser/Practitioner training and the Senior Leaders course) at the Defence Leadership Centre. Courses were initially paused and subsequently more focus placed on delivering courses online. Additional resources were provided to the Defence Leadership Centre to support the delivery of the Active Bystander Training module (recommendation 1.17).

A trial of 180-degree feedback has been completed across the single Services (recommendation 2.1). This leadership tool enables leaders at all ranks to obtain anonymous feedback from their teams. The feedback on the trial was positive and indicated that it encouraged behaviour change, an increase in the self-awareness of leaders, and was welcomed across a range of ranks. The intention is to implement 180-degree feedback across the Armed Forces later in 2020. This is a welcome step to help develop leaders' self-awareness as they identify their impact on others.

Evidence shows senior leaders are increasingly engaging in reverse mentoring

and fulfilling roles as champions, advocates and allies. The Royal Navy Transformation Talent Management Strategy intends to promote connected leadership training by introducing reverse mentoring, 360-degree reporting and a review of the appraisals and promotion processes.

In January 2020, an Employee Assistance Programme (EAP) launched for civil servants across the MOD, to provide support and advice on various issues including BHD. It received 92 calls to the end of September specifically related to BHD, with a noticeable tail-off during the Covid pandemic. Whilst civilians can still call the EAP for advice on BHD, the specific BHD helpline is now being promoted for the whole force.

The launch of the whole force BHD helpline on 1 September is a welcome step which especially fills a gap in provision for those serving in the Royal Navy and RAF (recommendation 3.4). In its first month it received 72 calls. Run by an external provider with professionally qualified advisers, this helpline has the potential to provide all Defence people with expert advice and support which should foster increased confidence in the reporting system. Low caller numbers from across the Services in its first month is potentially linked to the limited impact of communications promoting the helpline and the need to build trust in the system.

Callers are able to retain anonymity and will be directed back into their organisations, outside the chain of command, to make a complaint. This provision addresses the requirement outlined in recommendation 3.2 for an anonymous tool. The helpline ensures that people receive support by speaking to someone directly. This was considered preferable to a purely online anonymous tool with limited follow-up options.

Survey highlights

As part of this review, Defence personnel (both military and civilian) were invited to complete a short, anonymous, online survey. Participants were 62 per cent military and 38 per cent civilian with 1,065 individuals taking part. The majority of participants, 77 per cent, had worked in Defence longer than 10 years.

The participants were asked to describe their working environment, 34 per cent cited Army, 24 per cent RAF, 24 per cent Civil Service, 10 per cent Navy and 9 per cent from Strategic Command.

When asked if they had heard of the Wigston Review, 64 per cent confirmed they had, 31 per cent had not and 5 per cent were unsure. Those who had heard of the review learnt of it most commonly through internal communications or from their leaders. However, only 88 individuals felt that they were working to implement the recommendations.

Participants were asked if they were aware of any incidents of unacceptable behaviour in their working environment in the last 12 months. 29 per cent reported that yes, they were aware of incidents, 58 per cent not aware, and 10 per cent reported that whilst there were no issues, there had been in the past. Of those who were aware of incidents, 46.6 per cent were women.

Those working in a Civil Service environment had the higher number of participants indicating that they were aware of incidents of unacceptable behaviour in the last 12 months at 38 per cent. In the single Services the response rates were all around 25 per cent with UKStratCom slightly higher at 30 per cent.

15 per cent of participants identified as either having a disability, as LGBT+ or from a black or ethnic minority group. Of those, 46.9 per cent were aware of incidents of unacceptable behaviour over the past 12 months, and 63.5 per cent of them were women.

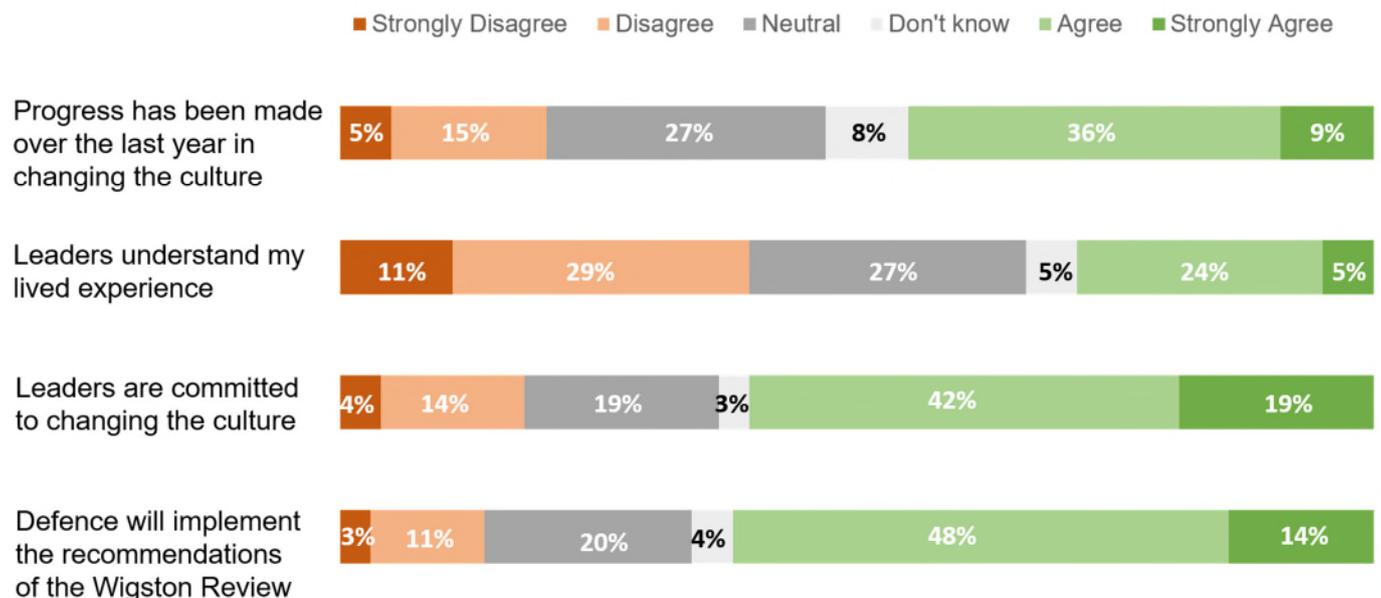


Figure 1: Drawing on your experiences over the last year, to what extent do you agree with the following statements?

(Base: All survey participants, 1,065. Note percentages have been rounded to the nearest whole number).

Of those participants who were aware of incidents of unacceptable behaviour, 63 per cent did not think the incident had been dealt with effectively, 15 per cent were unsure. 22 per cent thought the incident was dealt with effectively. Participants reported that most incidents occurred on MOD premises during working hours.

The survey results illustrate that of the participants, 45% believe that progress has been made in the past year, and 61% believe senior leaders are committed to changing the culture. This was reiterated in the focus groups. People now expect to see actions with 62% agreeing that the Wigston recommendations will be implemented.

Looking to the future

The majority of the recommendations set out below build on those in the Wigston Review. New recommendations are indicated in yellow.

Believing in change

Senior leaders have participated in a number of face-to-face meetings over the past year to hear the lived experience of a number of people representing different minority groups in Defence. Hearing stories directly, combined with discussions around black lives matter, has made a profound difference to senior leaders. This has, in part, resulted in the Chiefs' Commitments as well as real and deep personal reflection.

The challenge for Defence will be how it can bring the reality of the lived experience to life for everyone, and especially those in leadership roles. This lived experience awareness helps to ensure all understand the impact of unacceptable behaviours on people, teams and ultimately operational effectiveness.

Work is currently underway to incorporate the 2019 Lived Experience research findings by producing anonymous case studies for use in training.

It is still apparent that some people within Defence do not see the need for change, lived experience sharing and training may assist in changing this view. This has been evidenced in the all-staff dial-in on race and from comments made during the course of this review. However, examples of the damaging impact on those affected can not be ignored and by providing lived experience education, greater understanding should be achieved.



Recommendation 1: Make the lived experience a reality through experience sharing and training.

As reforms are made to the Service Complaints system, it will be imperative that efforts continue to ensure that issues can be reported without fear of reprisal, whether that be social exclusion, career opportunities, or an impact on wellbeing. The length of time it takes to resolve complaints must be reduced. Improvements to advice, support and communications about the complaints process should be considered from the perspective of the complainant, and also of the respondent, not just the process, recognising their needs and the ultimate intent of the proposed reforms.

The Service Complaints system has increasingly made managing unacceptable behaviour legalistic. Whilst Commanding Officers may need to have access to legal advice, the reliance on this has made the system more process oriented and less about people. More needs to be done to support leaders to resolve issues at the

earliest opportunity and using less formal processes.

Training and education

The importance of the quality and effectiveness of training and education to support behaviour change can not be over emphasised.

Observations have been made about the unintended negative consequences arising from disinterested or unqualified personnel delivering D&I training or briefs. Defence should remain alive to this risk and its effects, balancing internal provision of training with that delivered professionally and by third-party experts.

More targeted training and education initiatives are needed beyond mandatory training. A holistic approach should be taken to identify the areas they are most needed, for example by using the findings of climate assessments.

The new active bystander online module has received positive feedback since it's launch in July 2020. Implementation plans, which include face-to-face delivery and embedding principles into initial training and progression courses beyond the online module, should ensure wide coverage and that quality is maintained as it is rolled-out further.

In addition to active bystander training, managers and leaders need to be supported to act and intervene when unacceptable behaviours occur and to support positive behaviours.

Younger, less experienced leaders also need to be provided with access to experience and advice to deal with instances of unacceptable behaviours or to hold difficult conversations around D&I issues. This guidance may aid the early resolutions of issues and offer advice beyond just process and the trend of defaulting to legal advice. This should be

provided by trained qualified people and the DBS casework service may prove a useful example to draw on.

Recommendation 2: Take a holistic approach to target training and education interventions. Incorporate the findings of climate assessments and other sources of data which may indicate areas requiring culture change.

Recommendation 3: Make active bystander training mandatory across the whole force.

Recommendation 4: Provide a service readily available to inexperienced leaders to provide advice about dealing with unacceptable behaviours.

Communications

Improving the cascade of internal communications is crucial. Good initiatives and ideas, such as using apps to directly communicate on priorities and behaviours should be considered for all.

The volume of internal announcements and information on a variety of topics can present a challenge. If preventing and tackling unacceptable behaviours is a priority, internal communications must reflect this and leaders must be vocal.

Stories continue of people feeling unsupported in raising and responding to issues. Awareness of the new anonymous BHD helpline must reach everyone in Defence – efforts to do so have not been sufficient.

Service Chiefs should take responsibility for ensuring communications reach right through their organisations. The effective cascade of information is crucial for driving culture change and people need to be kept updated with progress. A new D&I Directorate in CDP's area should review best practice culture change communications, underpinned by support

from Government Communications experts, and deploy this within Defence, providing advice as needed.

Recommendation 5: Improve internal communications on unacceptable behaviours to ensure that they reach every level of the organisation from the most senior to the most junior. A more effective systematic and consistent approach to internal communications must be developed.

Accountability

The application of consequences for unacceptable behaviours is currently not sufficiently visible for people to have confidence that action will be taken if issues are raised. Multiple stories reflect a reality of perpetrators being moved on, or promoted, as opposed to being disciplined or dismissed. Visible action should be taken, both to build trust that unacceptable behaviour will be dealt with effectively, and to provide the right deterrence. Consequences need to drive the right kind of behaviour change. Strong leadership and action taken by peers is considered the strongest deterrent.

In addition, it is important to capture the learning that comes from dealing with incidents of unacceptable behaviours. Understanding how change happens, from how situations arose, were dealt with and what has changed is important. Climate assessments are one avenue to capture the positive responses.

Targets and commitments (such as the Levels of Ambition and Chiefs' Commitments) should be included in the Defence Plan. Steps to implement commitments should be integrated into senior leaders' objectives and cascaded down into the objectives of others. Performance against progress must be measured, through both the P&RR process and through individual's appraisals. A clear

plan, with milestones and actions is required. This can also draw on work underway to improve data (covered in the MI section above). This will go beyond the specific personal commitments of Defence's leaders.

Adequate resourcing for this work, including to deliver the recommendations made here, should be ensured. The establishment of a new D&I Directorate and uplift in posts will support this, the central posts must be filled, and resourcing in the single Services should be considered including the trend of 'gapped' posts.

As well as a role in holding Defence to account, a new D&I Directorate should spread and encourage best practice. Good examples exist across the Services for example, the Army Mediation Service and the Royal Navy 'My Navy' app. Networks and Champions have a role to play in sharing best practice too.

There is also a role for Non-Executive Directors (NEDs) on all boards in Defence, to ensure that best practice within the private sector is shared and understood and that this subject remains on the agenda at each board meeting. Regular cross-Defence NED meetings will be held by the Chair of the People Committee to ensure all NEDs are kept updated and can support efforts at all governance levels.

In finalising changes to the Service Complaints process, the review team should consider consulting those who have experienced unacceptable behaviours in the improvement of the people-focused elements of the system. Their experience of both reporting, or being reluctant to report issues, will provide direct feedback on the changed process from the perspective of a potential complainant.

Recommendation 6: Communicate both the consequences for unacceptable

behaviour and actions taken in response to complaints.

Recommendation 7: Embed targets and commitments into the Defence Plan. Align objectives throughout the organisation and track progress up to Defence Board level.

Recommendation 8: Adequate resourcing for this work, including to deliver the recommendations made here, should be provided.

Recommendation 9: Increase best practice sharing across the organisation, both utilising a new D&I Directorate and NEDs.

Recommendation 10: Consider user-feedback in finalising changes to the Service Complaints system.

Data and evidence

There is a need for a central team to set the frameworks and principles for training outcomes, climate assessments and the gathering of MI to ensure a consistent pan-Defence approach. This approach will enable the single Service and UKStratCom to report on how they are meeting requirements.

Efforts to improve data must continue. Data, suitable anonymised, from the BHD helpline and from digitising D&I Adviser logs, alongside other data points such as climate assessments should be collated to determine the extent of issues and trends in Defence. Climate assessments should be introduced for all.

Given the current limitations of AFCAS, CDP should give consideration to developing one survey, for everyone in

Defence on behaviours, raising complaints and D&I issues.

There are a wide range of initiatives ongoing across Defence, but understanding the volume of activity is not enough. A more sophisticated approach is needed to measure how effective they are. The training and education assurance framework, once developed, will assist with that. Defence should also be prepared to drop initiatives that are not making a difference and 'fail fast' rather than continuing on with long-standing programmes that are not achieving results.

Recommendation 11: Set the framework and principles for training outcomes, climate assessments and the gathering of MI including through surveys.

Recommendation 12: Develop a more sophisticated approach to understanding the effectiveness of programmes run in Defence.

Lead by action

Those who lead inclusively and act in a way consistent with the stated values and standards of the Services should be recognised. Leaders must be held accountable for the environment in their area of responsibility.

Rolling out the 180-degree feedback leadership tool across the Armed Forces will help to develop self-aware and inclusive leaders. It should be incorporated into appraisals, development planning and promotion boards. Consideration should also be given to feedback mechanisms for civil servants.

Recommendation 13: Embed 180-degree feedback mechanisms into military careers.

Our people said...

Several themes routinely emerged during focus group discussions and in the answers to open-ended survey questions:

Don't forget about civil servants: The emphasis of the Wigston Review was perceived to be more focused on issues in the Armed Forces. Civil servants felt they experienced similar challenges with unacceptable behaviour, especially when they worked in an environment where they were in a minority.

The impact of banter isn't always understood: Whilst generally recognised as part of Service life, understanding the impact of banter that goes too far, or lands badly was lacking. Banter can quickly merge into bullying or harassment. Some people felt it was easier to challenge banter once they had gone along with it and were accepted as one of the team.

They recognise generational change: Things that may have been ok in the past, for example in training environments, were no longer ok. The expectations of the younger generation are different, they can seem more tolerant of diversity and inclusion and often the challenge was perceived to be with the 'old and bold'. Senior leaders struggle to navigate social media and ways in which the under-30s communicate – this means some types of unacceptable behaviour, such as social exclusion, can be easily missed or are invisible. Leadership must set the tone.

It's still difficult to raise issues: Defence is still white and male dominated which makes it difficult for people who have never experienced unacceptable behaviour personally to understand how it feels – or to even recognise it. It can be subtle and pervasive everyday comments. It's still hard to speak truth to power given the hierarchical nature of Defence, especially where it could spark career implications. When people complain, it is often the complainant who is seen as the problem and their wellbeing can suffer. Leaders often want a quiet life and are not motivated to confront issues. People who behave in unacceptable ways can continue to move on and get promoted without consequence.

They feel energised about changing the culture: There is a clear desire to improve the situation, with lots of engagement and energy in this area. Expectations and the understanding of what is acceptable has changed over the past few years. Positive examples were given where senior leaders had spoken out about their mistakes and how they learned from them and had taken action.

Annex A - Terms of Reference

Introduction

1. The Wigston Review into Inappropriate Behaviour was published by the then Secretary of State for Defence on 15 July 2019, and its recommendations accepted in full. The current Secretary of State has directed that a review take place of the progress that has been made by Defence (defined for this purpose as Head Office and the single Services) in implementing the recommendations.

Detail

2. The Review will be led by Danuta Gray, Chair of MOD's People Committee. Secretariat support will be provided by the Wigston Review Implementation Team. The review will begin on 15 July 2020 and complete on 15 October 2020.

3. The intention of the Wigston Review was to enable and energise Defence to put in place the measures that are needed to bear down on inappropriate behaviour, to reduce the amount of inappropriate behaviour that occurs and to make it easier for individuals to come forward when it does. This can only be achieved through a change in the culture of Defence, and the Wigston report estimated that it would take 5-10 years of concerted activity to make a measurable difference.

4. It would be unrealistic therefore to expect to see changes in the culture after 1 year. Nevertheless, Ministers need to know whether an acceptable start has been made, in order to be able to direct greater effort or a change of direction if necessary.

5. The Review will therefore examine the progress that has been made by Head Office and the single Services in implementing each of the recommendations.

This will identify which recommendations have been:

- Implemented
- Not yet implemented but in progress, or plans agreed
- Not implemented

6. The Wigston Report recognised that its work had been conducted at pace and without the benefit of the full range of evidence that would have been available in a longer exercise, and that further work may reinforce or reveal contrasting interpretations of the evidence. The Review should therefore consider whether Defence has found this to be the case, and whether it believes that the intentions of the Wigston Report could be achieved in different ways.

7. It is recognised that covid-19 emerged as a major pandemic health crisis during the implementation period, and that with the agreement of Ministers implementation was paused from 23 March to the beginning of June to enable the single Services to focus on support to the civil community. Although being conducted one year on, the review therefore covers less than 12 months of activity.

Stakeholders

8. The leader of the Review will be free to interview whichever members of Defence she chooses, but because the intent of the Wigston report was to change culture, and because culture change needs to be led from the top, the review is expected to interview at least the Chief of Defence Staff, Permanent Secretary, single Service Chiefs of Staff, Vice Chief of Defence Staff, Chief of Defence People and Civilian HR Director.

Final Report

9. The report is to be submitted to the Secretary of State for Defence by 15 October 2020. It is intended that the report will be published in the public domain.

Annex B - Methodology and stakeholder engagement

Danuta Gray, Non-Executive Director and Chair of the People Committee undertook this review over a period of three months.

The following people from across Defence were interviewed as part of this review:

- Chief of Defence Staff
- Permanent Secretary
- First Sea Lord
- Chief of the General Staff
- Chief of the Air Staff
- Commander, UK Strategic Command
- Nominated Senior Responsible Officers for culture and behaviours in the single Services and UKStratCom
- Vice Chief of Defence Staff
- Chief of Defence People
- Civilian HR Director
- Chief Operating Officer
- Assistant Chief of the Defence Staff - People Capability
- Commandant, Defence Academy
- MOD Civilian Race Champion and Race Network Co-chairs
- Service Complaints Ombudsman for the Armed Forces
- Wigston Review drafting team
- Wigston Review Implementation Team (WRIT)
- Service Complaints Transformation team
- Non-executive Directors within single Services and UKStratCom

The reviewer assessed evidence provided by the single Services, UK StratCom and Head Office demonstrating progress implementing the recommendations.

A range of internal and external reports and studies were drawn on.

To ensure a range of views and input to the review, an anonymous online survey was open to all personnel and was completed by 1,065 participants from across the Royal Navy, Army, RAF, UKStratCom and MOD Civil Service.

Focus groups were held with female junior officers, female phase 2 trainees, personnel in the Royal Navy and two sessions were held with civil servants. As a result of the high level of interest from RAF junior female officers in the focus groups, a dial-in session was held in partnership with the RAF gender network.

Annex C: Chiefs of Staff Commitment to maximising everyone's talent

The events of recent months have provided a stark reminder of the inequalities that continue to exist in our society, within the Armed Forces and within Defence as a whole. It is mission critical for Defence - if we are to safeguard the security, stability and prosperity of our nation - that we recruit and retain the most able people drawn from the broadest diversity of thought, skills and background. While we have made some progress on matters of diversity, inclusion and inappropriate behaviour, we are clear that if we are to improve the diversity and inclusion of our work force we must take urgent action to access and maximise all our talent.

We are determined to make a collective commitment as follows:

- We will set targets and we will be held to account for delivering the policy, process and behavioural changes required to deliver the levels of ambition that each Front Line Command has set for 2025. To drive transparency and accountability, each Front Line Command will publish publicly its levels of ambition and associated delivery plans by September 2020. To enable this, we are committed to resourcing our D&I teams with high quality military and civilian staff and we will provide increased funding for our D&I programmes.
- We will modernise the promotion system so that it fairly maximises everyone's potential and where emotional intelligence (EQ), integrity and behaviours are considered equally alongside objective delivery. To drive this change, we will conduct an independent review of promotion boards (to report in early 2021), refresh our current appraisals process, and review all job specifications to remove arbitrary barriers to progression, expanding our talent pools.
- We will modernise the career structure and associated terms and conditions of service to make it more flexible, focusing more on potential. Recognising the increasing requirement for specialist career streams, it must enable initiatives like lateral entry that can accelerate the growth of a more diverse workforce. Building on the recommendations within the Wigston Report, we will champion positive action pathways (e.g. the Women's Development Programme), and we will use our D&I champions and networks as critical partners throughout.
- We believe it is critical that everyone has confidence in the Service Complaints system, both to report their experiences, but importantly to trust that where evidence of inappropriate behaviours is presented, swift action will be taken. Following the release of the Service Complaints review findings in Autumn 2020, we will take personal ownership for implementation of the recommendations. We will also work to ensure parity and coherence with the civilian grievance system to drive a unified culture that has zero tolerance at its core.
- We each have a responsibility to drive change within the Front Line Commands and within Defence. We must embed D&I into our culture. We are committed to setting a personal example; genuinely to improving the lived experience for everyone; and regularly engaging with our D&I agenda by being held formally to account by publishing a report every 6 months. We are all determined to deliver this agenda and to taking demonstrable action with immediate effect.

Annex D – Progress against recommendations

			Royal Navy	Army	RAF	UK Strategic Command	Head Office Policy*	Head Office Delivery**
1.1	MI	Defence must improve the level of detail and metadata captured on serious unacceptable behaviour as well as instances of lower severity, to provide a single comprehensive picture of inappropriate behaviours across the organisation.	Pro	Pro	Pro	Pro	Pro	Pro
1.2	Policy	Defence should consider amendig primary legislation to require the sharing of information from the civilian Criminal Justice System.					Imp	
1.3	MI	Defence should develop performance measures relating to inappropriate behaviours for use at Defence Board, Executive Committee and Performance and Risk Reviews.					Imp	
1.4	MI	Defence should conduct a harassment survey in 2021 building on the Army Sexual Harassment Survey 2018, informed by an independent advisory group.	NI	Imp	Pro		Pro	Pro
1.5	MI	Defence should better coordinate and focus the bullying, harassment and discrimination elements of continuous attitude surveys to improve understanding, reduce duplication and streamline data analysis. Use of contemporary, on-line survey formats should also be considered.					Pro	
1.6	Policy	Revise Joint Service Publication (JSP) 763 (MOD Bullying and Harassment Complaints Procedures) as a policy priority.					Pro	
1.7	Leadership	Establish a MOD focal point – a Senior Responsible Owner – to own, track and inform Defence culture and behaviours.					Imp	

			Royal Navy	Army	RAF	UKStrat Com	Head Office Policy	Head Office Delivery
1.8	Leadership	Defence and single Service Boards should include culture and behaviours as a standing agenda item, with a single executive owner held to account by non-executive directors or audit committees.	Imp	Imp	Imp	Imp		Pro
1.9	Policy	Climate assessments and advisory visits should be sustained and exploited across Defence.	Pro	Imp	Pro	Pro	Pro	Pro
1.10	Comms	Single Service values and standards should be sustained but communication of the Civil Service Code should be amplified.	Imp	Imp	Imp	Imp	Imp	Imp
1.11	Training	Mandated diversity, inclusion and values training must be prioritised, irrespective of rank.	Imp	Imp	Imp	Imp		Imp
1.12	Training	Maximise use of immersive values-based training across Defence.	Pro	Pro	Pro	Pro	Pro	Pro
1.13	MI	Defence should investigate causes of overrepresentation of minority groups, women and junior ranks in the complaints process and implement the necessary training interventions as part of an overarching strategy to address the issue.			Pro		Pro	
1.14	Leadership	Defence should develop a process for measuring the impact of culture and behaviours training programmes.					Pro	
1.15	Training	Increase group-based training opportunities for civil servants, especially in military events appropriate to the whole force.	Pro	Pro	Pro	Pro		

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			Royal Navy	Army	RAF	UK Strat Com	Head Office Policy	Head Office Delivery
1.16	Policy	Defence should investigate the synergy between EDIA and Speak Safe approaches to share best practice and ensure we are making best use of the available resources.					Imp	
1.17	Leadership	The resource and priority afforded to Intrinsic Leadership and Behaviours at the Defence Leadership Centre should be adjusted to meet the demands of the three Services and the Civil Service.					Pro	
2.1	Leadership	Services sustain and promote connected leadership in their training and preparation of leaders. Feedback mechanisms such as reverse mentors, focus groups and 360° reporting are leading practice and should be maximised.	Pro	Pro	Pro	Pro		
2.2	Training	All recruits should receive immersive culture and behaviour training at the start of service and continued at regular intervals through their career.	Pro	Pro	Pro			
2.3	Training	Use of third-party training expertise is considered leading practice and should be resourced and exploited across Defence.	Pro	Pro	Pro		Pro	Pro
2.4	Training	Investigate, develop and implement appropriate bystander training across Defence.	Imp	Imp	Imp	Imp	Imp	Imp
2.5	MI	Consideration should be given to gathering additional values, attitudes and standards information on new recruits to assess the risk and tailor preventative training.					Pro	
2.6	Training	Single Services must sustain and protect their investment in high quality instructors and instruction at initial training.	Pro	Pro	Pro			

			Royal Navy	Army	RAF	UK Strat Com	Head Office Policy	Head Office Delivery
2.7	Training	Induction and collective training opportunities for MOD civil servants must be reviewed, resourced and improved.	Pro	Pro	Pro	Pro	Pro	Pro
2.8	Policy	Defence social media policy and training should focus equally on the avoidance of inappropriate behaviours as well as the security implications of online activity.	Pro	Pro	Pro		Pro	Pro
2.9	Comms	Communication on behaviours must be consistent and persistent. How we deal with inappropriate behaviour must be transparent, including the appropriate publication of outcomes.	Pro	Pro	Pro	Pro	Pro	Pro
3.1	MI	In line with recommendation 1.4, Defence should consider a 'call for evidence' on inappropriate behaviours in conjunction with a sexual harassment survey in 2021.					Pro	
3.2	Leadership	Resource, develop and implement an anonymous tool for reporting inappropriate behaviours across Defence.					Imp	
3.3	Comms	Implement a clear, simple and enduring communications campaign to articulate the range and scope of inappropriate behaviours, and what to do when instances occur.	Pro	Pro	Pro	Pro	Imp	Imp
3.4	Leadership	Establish an inappropriate behaviours helpline for all Defence personnel.					Imp	
3.5	Policy	Defence should review and improve the provision of support offered to all parties, including appropriate training for Assisting Officers.					Pro	
3.6	Policy	Defence should resource, train and deliver an effective, certified and professional mediation service, recognising and addressing the potential risks of mediation identified by the Service Complaints Ombudsman.	Imp	Imp	Imp	Imp	Imp	Imp

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			Royal Navy	Army	RAF	UK Strat Com	Head Office Policy	Head Office Delivery
3.7	Policy	Establish a Defence Authority responsible for cultures and inappropriate behaviours.					Pro	
3.8	Policy	Allocate the responsibility for the reporting and handling of all serious behavioural complaints to the Defence Authority, based on an agreed threshold and including anonymous and bystander reporting.					NI	
3.9	Policy	Consideration be given to amending primary legislation to allow civil servants to raise a grievance through the Service Complaints system.					Imp	
3.10	Policy	Implement a two-tier complaints system, reserving the full scope of the current system for the most complex cases including bullying, harassment and discrimination.					NI	
Key								
Imp	Recommendation implemented (abbreviated to 'Imp' for implemented)							
Pro	Recommendation in progress or plans agreed, but not yet fully implemented (abbreviated to 'Pro' for in progress)							
NI	Recommendation not implemented (abbreviated to 'NI' for not implemented)							
	Recommendation is not led by the organisation, usually because it is centrally driven by Head Office with engagement from across Defence.							
*Head Office Policy refers to central ownership and policy/requirement development **Head Office Delivery refers to the implementation of recommendations within Head Office								

