

Plaid Cymru commissioned

REVIEW INTO ANTISEMITISM

undertaken by Liz Saville Roberts MP

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1 Introduction

Plaid Cymru is committed to being a safe space for Jews and to playing our part in ensuring that Jews are safe in Wales and the United Kingdom. This commitment is enshrined in the Party's Antisemitism Statement.

The Leadership of the Party is determined that the Antisemitism Statement be incorporated into the Party's policies, procedures, structures and culture. To this end, and following discussion with the Board of Deputies of British Jews regarding a number of antisemitism complaints made against Party members and representatives over the last two years, the Leader commissioned a review by the Leader of the Westminster Parliamentary Group.

1.1 Plaid Cymru's Constitutional aims and Antisemitism Statement

Plaid Cymru has a stated constitutional aim 'to build a national community based on equal citizenship, respect for different traditions and cultures and the equal worth of all individuals, whatever their race, nationality, gender, colour, creed, sexuality, age, ability or social background'. This statement is followed with the additional sentence: 'These are the Party's core values.'

The Party adopted its Antisemitism Statement on 29 February 2020.

Plaid Cymru Antisemitism Statement

Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.

The guidelines highlight manifestations of antisemitism as including contemporary examples of antisemitism in public life, the media, schools, the workplace, and in the religious sphere could, taking into account the overall context, include, but are not limited to:

1. Calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion.
2. Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective – such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions.
3. Accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group, or even for acts committed by non-Jews.
4. Denying the fact, scope, mechanisms (e.g. gas chambers) or intentionality of the genocide of the Jewish people at the hands of National Socialist Germany and its supporters and accomplices during World War II (the Holocaust).
5. Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust.
6. Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.
7. Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavour.
8. Applying double standards by requiring of it behaviour not expected or demanded of any other democratic nation.
9. Using the symbols and images associated with classic antisemitism (e.g., claims of Jews killing Jesus or blood libel) to characterize Israel or Israelis.
10. Drawing comparisons of contemporary Israeli policy to that of the Nazis.
11. Holding Jews collectively responsible for actions of the state of Israel.

Plaid Cymru believes that everyone is equal irrespective of his or her race or religion. This means that all forms of hate crime must be condemned equally.

It is not antisemitic to criticise the Government of Israel, without additional evidence to suggest antisemitic intent.

It is not antisemitic to hold the Israeli Government to the same standards as other liberal democracies, or to take a particular interest in the Israeli government's policies or actions, without additional evidence to suggest antisemitic intent.

Plaid Cymru hereby adopts the above definition of antisemitism and pledges to combat this pernicious form of racism.

1.2 Terms of Reference of Antisemitism Review

Terms of reference

Plaid Cymru is committed to being a safe space for Jews and to playing our part in ensuring that Jews are safe in Wales and the United Kingdom. This commitment is enshrined in the Antisemitism Statement passed by Party members on 29 February 2020.

The Leadership of the Party is determined that the Antisemitism Statement is incorporated in the Party's policies, procedures, structures and culture. To this end, the Leader of the Party has commissioned a review by the Leader of the Westminster Parliamentary Group.

1. To evaluate present policies and procedures in place to put Plaid Cymru's Antisemitism Statement into effect. This will include an investigation into historical complaints related to antisemitism with the objective of identifying lessons for the future and making appropriate recommendations.
2. In consultation with Plaid Cymru members, representatives of the Jewish community and race equality organisations, to identify a framework of best practice in order to put Plaid Cymru's Antisemitism Statement into effect in its policies, procedures, structures and culture.
3. To make any necessary recommendations regarding training, policies and party procedures, including disciplinary structures and internal party processes for dealing with allegations of antisemitism within Plaid Cymru.
4. To consider whether any issues identified in the course of the review are relevant to broader areas of prejudice, including Islamophobia, racism and discrimination against any other protected characteristic, and to make further recommendations related to Party policies, procedures and structures on that basis.
5. To present a final report by the first week of January to the Party Leader who will consider the report and present its findings to the Party's National Executive at the earliest available opportunity.

The report's final recommendations and an explanatory commentary will be made public.

1.3 Antisemitism Review methodology

The review was commissioned by Party Leader Adam Price at the end of October 2020, and conducted by Plaid Cymru's Parliamentary Group Leader, Liz Saville Roberts MP. All the relevant historical complaints documentation, general complaints data and party procedures and policies were provided by Chief Executive Gareth Clubb, who left the Party at Christmas 2020. Further documentation was provided by interim Chief Executive, Marc Phillips.

Submissions were invited from Party members and identified Jewish and human rights groups in November 2020, and all submissions received until January 2021 have been considered.

Given that much of the review was conducted during Covid-19 lockdown in Wales, discussions had to be held distantly; all other evidence was presented as written submissions.

Written submissions were invited, and direct conversations, either by phone or virtual conference, were held with individuals from within and beyond the Party, and the following representative organisations:

- Board of Deputies of British Jews
- Antisemitism Policy Trust
- Jewish Leadership Council

2 Relevant policies, legislation, and context

2.1 Plaid Cymru’s Antisemitism Statement and the IHRA working definition of antisemitism and illustrations

The International Holocaust Remembrance Alliance (IHRA) working definition¹ comprises a 39-word definition, two illustrative clauses and a list of illustrations, as follows:

Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.

Manifestations might include the targeting of the state of Israel, conceived as a Jewish collectivity. However, criticism of Israel similar to that levelled against any other country cannot be regarded as antisemitic. Antisemitism frequently charges Jews with conspiring to harm humanity, and it is often used to blame Jews for “why things go wrong.” It is expressed in speech, writing, visual forms and action, and employs sinister stereotypes and negative character traits.

Contemporary examples of antisemitism in public life, the media, schools, the workplace, and in the religious sphere could, taking into account the overall context, include, but are not limited to:

- *Calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion.*
- *Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective – such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions.*
- *Accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group, or even for acts committed by non-Jews.*
- *Denying the fact, scope, mechanisms (e.g. gas chambers) or intentionality of the genocide of the Jewish people at the hands of National Socialist Germany and its supporters and accomplices during World War II (the Holocaust).*
- *Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust.*

¹ <https://www.holocaustremembrance.com/resources/working-definitions-charters/working-definition-antisemitism>

- *Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.*
- *Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavour.*
- *Applying double standards by requiring of it a behaviour not expected or demanded of any other democratic nation.*
- *Using the symbols and images associated with classic antisemitism (e.g., claims of Jews killing Jesus or blood libel) to characterize Israel or Israelis.*
- *Drawing comparisons of contemporary Israeli policy to that of the Nazis.*
- *Holding Jews collectively responsible for actions of the state of Israel.*

The IHRA definition and illustrations are intended to be put into effect on the basis of consensus and are not legally-binding: the examples are not presumed to be conclusive or exhaustive indicators upon which to decide whether a specific incident is antisemitic, rather they are intended to provide an indicator as to whether such an incident warrants further investigation.

Plaid Cymru's present Antisemitism Statement consists of the working definition of antisemitism produced by International Holocaust Remembrance Alliance (IHRA) along with a list of 11 illustrations adopted by IHRA Plenary in 2016, and also two additional clarifications proposed by House of Commons Home Affairs Select Committee in the recommendations of its 2016 report, 'Antisemitism in the UK'². It does not, however, include the first two illustrative clauses from the IHRA definition in their entirety.

The Party's statement was not universally welcomed at the time of adoption, and one submission to the review questioned whether Plaid Cymru should have engaged with the IHRA definition at all.

The two Home Affairs Select Committee clarifications specify the need for evidence of antisemitic intent. This review proposes that Plaid Cymru should adopt an approach which seeks to establish firstly whether conduct or rhetoric was antisemitic. A finding of antisemitic conduct or rhetoric is therefore not dependent on proof of intent, although the degree of intent will inform actions or sanctions proportionately. To put this approach into effect, Plaid Cymru's Antisemitism Statement should adopt the IHRA definition and all illustrative clauses and illustrations without the two Select Committee clarifications, as these are not consistent with recommendations regarding the status of intent.

² <https://publications.parliament.uk/pa/cm201617/cmselect/cmhaff/136/136.pdf>

The Board of Deputies of British Jews' submission to this review notes that there have been some objections to the IHRA definition examples which refer to Israel. They believe that these examples relate to the experience of antisemitism in the UK in recent decade:

*'A basic pattern within UK antisemitism has been to demonise Israel as essentially wicked - rather than as a state that has policies one might disagree with - and then tie Jews to that demonised Israel in order to push Jews out of public and shared spaces.'*³

The submission proposes that Jews effectively face a political 'oath of allegiance' in the form of an 'anti-Israel' test in certain political arenas, where they are required to express either animosity towards Israel or face further antisemitism.

*'Even if one were to expect Jews to pass this test out of convenience, in the current situation where more than 40% of the world's Jews live in Israel, and Israel is the well-spring of Jewish culture and identity for most Jews, this is an impossible test for many Jews to pass. For many British Jews, if they were asked if they agree that the Israel (conscripted) army is 'Nazi' in some way, they may be being asked whether their cousin, niece or nephew is a Nazi. If they are asked to boycott Israeli cultural content - or even cultural content that is supported by Israel, then they are being asked to abstain from the vast majority of Hebrew culture. It is important to understand that the Hebrew language revival of the last 200 years is as important to Jews as the Welsh language revival is to Wales.'*⁴

The Board of Deputies' submission makes specific reference to the IHRA definition's example of *Using the symbols and images associated with classic antisemitism (eg claims of Jews killing Jesus or the blood libel) to characterize Israel or Israelis*. This is a significant and potentially complex point for Plaid Cymru members and other politically active people from a non-Jewish tradition. Although there is a risk of over-generalising, it is worth noting that the representation of spilt blood is a broadly accepted image employed to convey abhorrence at a violent act: people from a non-Jewish background (and quite possibly some Jews too) can conventionally be anticipated to interpret such imagery as justified symbolism. But it is also undeniable that the blood libel trope has been used for centuries with deliberate antisemitic intent. These are two different cultural approaches: one approach accepts the depiction of blood as fair comment, the other lives in the shadow of historical events and the blood libel's associations with genocidal pogroms. In such circumstances, people who venture into the political arena need to be alert to the implications of the symbolism they choose to publicise. Ignorance of potential culture clashes may be understandable in the first instance, but cannot be a sustained excuse.

³ Submission to Plaid Cymru Antisemitism Review, Board of Deputies of British Jews

⁴ Ditto

2.2 Equality Act 2010

The Party has responsibilities as an ‘association’ under the Equality Act 2010⁵. For the purposes of the Act, an association is an organisation which has at least 25 members and regulates admission to membership by means of rules and a selection process. Most UK political parties are associations in this sense. The Equality Act 2010 makes it unlawful for an association to discriminate or victimise its members, prospective members, guests and associates on the basis of race and religion. Discrimination can be ‘direct’ or ‘indirect’. The Equality Act 2010 also makes it unlawful for an association to harass the same groups of people on the basis of race.

The Equality and Human Rights Commission published an *Investigation into antisemitism in the Labour Party*⁶ in October 2020 in response to a complaint from the Jewish Labour Movement and the Jewish representative group, Campaign Against Antisemitism. The Commission concluded that the Labour Party had breached the Equality Act 2010 by committing unlawful harassment through the acts of its agents. The investigation stated that:

‘Antisemitic conduct by Labour Party members is unlawful harassment under the Equality Act 2010 when:

- It is unwanted conduct related to Jewish ethnicity*
- It has the purpose or effect of violating the dignity of one or more Labour Party members, or creates an intimidating, hostile, degrading, humiliating or offensive environment for them, and*
- The Labour Party is responsible for it, because the person or people who carry out the antisemitic conduct are its employees acting in the course of their employment or agents acting in the course of their authorised functions.’*

Annex 3 of *Investigation into antisemitism in the Labour Party* explains the legal responsibility of the Labour Party in relation to the conduct of its agents and the impact of the IHRA definition of antisemitism on the EHRC’s investigation.

Under the Equality Act 2010, the Party is legally responsible for unlawful conduct carried out by its agents in the course of party-authorised functions or duties.

Plaid Cymru should be alert to our responsibilities in relation to the role of agents and the Equality Act 2010.

⁵ <https://www.equalityhumanrights.com/en/publication-download/what-equality-law-means-your-association-club-or-society>

⁶ <https://www.equalityhumanrights.com/en/inquiries-and-investigations/investigation-labour-party>

2.3 Antisemitism of the Left

For many people engaged with politics of the left, antisemitism is primarily considered to be racism committed by supporters of right-wing movements, especially neo-Nazism. While Plaid Cymru's members are highly likely to be appalled by the history of Nazi acts of genocide against Jews and other minority groups in the 1930s and 40s as portrayed in educational and cultural references to the Holocaust (ie school curriculum content, films such as 'Schindler's List', the novels of Primo Levi and Anne Frank's diary, etc), it is possible that a wider awareness of antisemitism matters is less familiar, especially in relation to how some people engaged in left wing politics are at risk of venturing, maybe unawares, into racist conduct if they are insufficiently alert to its own particular antisemitic tradition and common reference points. The Community Security Trusts's Antisemitic Incidents Report for 2020⁷ recorded 1,668 incidents of antisemitism. The report states that far-right motivation was explicitly evident in 105 instances, and 65 incidents evidenced far-left discourse.

The Board of Deputies' submission provides interesting commentary on the background to left-wing antisemitic sources, and points to the former Soviet Union as the originator of antisemitic terminology and imagery. It is worth noting that the global conspiracy calumny of the fabricated text '*The Protocols of the Elders of Zion*' was first published in Russia in 1903, and that the pre-1917 state had an established tradition of condoning and encouraging pogroms as a means of social and political control. It is also worth recalling that antisemitic riots (ie pogroms) have occurred throughout Europe, including the Tredegar riot of 1911, which is the background to the film, *Solomon & Gaenor*.

The submission emphasises how the intrinsic racist assumptions underpinning antisemitic acts can be camouflaged by sleights-of-hand in terminology, while the experience of the Jewish people remains the same.

Much antisemitism we see today sadly echoes antisemitic acts and propaganda from the Soviet Union and its allies during the 20th century, which was intended to marginalise Jews while allowing plausible deniability as to antisemitic intent. The plausible deniability rested on two arguments. Firstly, antisemitic narratives were transferred from 'Jews' to 'Zionists' or 'Israel'. Secondly, the Soviet Union's wider rhetorical commitment to anti-racism showed, it was argued, that its institutions could not be antisemitic. The first instance of this mechanism is usually considered to be the show trial of Jewish Czech Communist Party Chairman Rudolf Slansky in 1952, who, in classic antisemitic style, was accused of political conspiracy, with the innovation that he was not doing so as a Jew but as a Zionist. Thousands of Jewish Poles were purged from employment in Poland in 1968 having been accused of being responsible for that year's student uprisings, not as Jews but as Zionists. In the 1980s, the USSR produced propaganda, distributed around the world, equating Zionism with Nazism, as a means for the political repression of its Jewish citizens. This transference of

⁷ <https://cst.org.uk/data/file/7/2/Incidents%20Report%202020.1615559608.pdf> (p8)

antisemitic narratives from ‘Jews’ to ‘Zionists’ or ‘Israel’ was disseminated around the world through the regime’s allies both in terms of aligned institutions in the West and what were then referred to as third world movements. Crucially, Soviet Bloc regimes responded to complaints that these episodes were antisemitic by arguing that these allegations were bad faith smears to ‘cover up’ Israeli and Zionist oppression of Palestinians, or even to stop world socialism. Although the USSR and its allies have long ceased, this is one of its legacies which is still in circulation, to some extent, on the Left. It is simultaneously true that these narratives continue to have their originally intended effect of marginalising and enabling the marginalisation of Jews, and that the perpetrators of such rhetoric or acts may not intend to be antisemitic.⁸

The Board of Deputies’ submission also proposes that people engaged with left-wing politics may acknowledge antisemitism when it affects people associated with politics with which they identify, but refute antisemitism when it applies to others:

Many on the Left would recognise a cartoon of George Soros with antisemitic tropes - bloody hands, grasping for money, controlling others - as antisemitic, but not recognise the same tropes included in a cartoon of Binyamin Netanyahu as antisemitic. Plaid Cymru needs to show that it understands that there can be antisemitism on the Left, and it has a particular relationship around the discourse concerning Israel.⁹

There are concerns about how to discuss the Israeli/Palestinian conflict appropriately. It is evident that the Party needs to conduct further internal discussion about how to engage in this discourse without racist conduct or rhetoric, and to be alert to the likelihood of further complaints. Suggestions regarding how best to approach this were raised as evidence was collected for this review, and Danny Stone of Antisemitism Policy Trust referred to TUC training resources¹⁰.

⁸ Submission to Plaid Cymru Antisemitism Review, Board of Deputies of British Jews. For further debate on this point, see [Izabella Tabarovsky published by Fathom Magazine](#).

⁹ Ditto

¹⁰ <https://learning.elucidat.com/course/5daed7c9acd4e-5f29224dd8003>

2.4 The role of social media platforms in political debate

The potentially permanent nature of all material posted on social media platforms throughout an individual's political career, and previously, needs to be better understood throughout the Party. Conduct which previously might have been spoken and thus could have passed unrecorded is now more likely to be enacted on a social media platform than face-to-face, and thus recorded in digital format: evidence for complaints is therefore easier to collate and the likelihood of complaints is greater.

The nature of content on social media means that more people are exposed to a greater degree than ever before to extensive sources whose background is opaque and whose purposes may be deliberately disruptive. Social media algorithms can repeatedly direct material to people's news feeds in such a way as to act as a self-fulfilling reinforcement of views rather than encouraging critical evaluation. In short, social media is structurally designed to facilitate belief in false conspiracy theories, and to encourage conspiratorial thinking, including unquestioning acceptance of antisemitic conspiracies.

There is a culture on platforms such as Twitter and Facebook of sharing and liking material to show affiliation with particular groups, including both specific and loosely associated political allegiances. Many people have yet to adopt a critical approach to such actions, assuming that content posted by a friend or a group-condoned source will be politically appropriate by association. This evidently becomes a progressively riskier strategy as individuals become more politically active, and especially at the point of entry into Party representation.

3 Historical complaints related to antisemitism

The Antisemitism Review has considered all complaints associated with antisemitism which have been recorded in the Party's complaints procedures during the last five years and whose investigations have been concluded by the Membership, Disciplinary and Standards Committee.

Former Chief Executive of Plaid Cymru, Gareth Clubb, stated that the Party did not assess whether a complaint should be treated formally or not: all complaints being referred to the MDS Committee.

Mr Clubb emphasised that historical complaints could not legitimately be reopened, as they had been considered under the Standing Orders which were current at the time. He described Standing Orders as being the contractual agreement between the Party and its membership, and that to act ultra vires would be tantamount to a breach of contract. This point was emphasised to the Board of Deputies, who '*understands that the same case cannot be heard twice without new evidence*'¹¹. Nonetheless they suggested that further engagement with Jewish community representatives would be beneficial moving forward.

The Antisemitism Review considered all disciplinary hearings since 2016. No complaints related to antisemitism were received before 2019. Antisemitism complaints lead to seven disciplinary hearings between 2019 and January 2021: these constituted 8.2% of the total number of concluded complaints received over the last five years.

¹¹ Submission to Plaid Cymru Antisemitism Review, Board of Deputies of British Jews

3.1 Commentary on complaints procedures as reflected in historical complaints related to antisemitism

The way the Party handles antisemitism complaints specifically needs to change as a matter of urgency. It should also address the need to change how complaints related to protected characteristics in general are handled with equal emphasis.

There appears to be an underlying assumption that complaints panel members are sufficiently equipped to come to a decision without further advice or training on politically charged matters which may be beyond their personal experience. We require our volunteer MDS Committee members to operate like magistrates, but without the benefit of the advice of a clerk of court. They undertake the thankless task of serving on hearing panels because they have the Party's best interests at heart. This is praiseworthy, but the Party runs the risk of assuming that individuals' interpretation of where the Party's best interests lie may not always be consistent, in accord with stated constitutional aims or long-sighted.

Taking the longer view, the Party is at risk of causing greater reputational damage to our interests by continuing to act in a way which ill-befits a party whose stated core value is: *To build a national community based on equal citizenship, respect for different traditions and cultures and the equal worth of all individuals, whatever their race, nationality, gender, colour, creed, sexuality, age, ability or social background.*

It is considered that the overwhelming majority of Party members would pride themselves on taking a stand against racism and in expressing active political support for minorities. The vast majority of Party members are also of white Welsh/UK ethnicity and of a Christian or non-religious background. In this respect many within the Party might engage in unconscious bias when we approach matters related to racism, antisemitism, and Islamophobia.

The Party should explicitly adopt the Macpherson principle when addressing complaints related to incidents which are perceived to be racist by the complainant or other relevant people. The Macpherson principle requires complaints related to racism to be treated as valid complaints, although it is legitimate for an investigatory hearing to conclude after due process that the incident was not racist.¹²

The role of antisemitic intent is discussed in detail in the Board of Deputies' submission, where they express concern that *'rhetoric or an act, that can have ... a negative potential impact on Jews, can be discounted as antisemitic due to an inability to establish intent.'*¹³ While intent is significant, it should not be a necessary factor in deciding whether rhetoric or conduct are antisemitic; rather, the existence of intent should influence what actions or sanctions arise after a finding of antisemitism.

¹² See Lord Macpherson's 1999 report into the death of Stephen Lawrence, as summarised in <https://commonslibrary.parliament.uk/research-briefings/cdp-2019-0052/>

¹³ Submission to Plaid Cymru Antisemitism Review, Board of Deputies of British Jews

Secondly, questions need to be addressed regarding how and which Standing Orders are applied in the complaints procedure: is there a need for either additional clauses in the Standing Orders or a review of whether the most relevant Standing Order clauses are being implemented in relation to antisemitism complaints, or both? It is evident that SO 3.1 ix - ‘conduct which amounts to discrimination towards **any person** on the grounds of the following characteristics: age, sex, disability, race, ethnicity, nationality, religion, belief, sexual orientations, gender reassignment, pregnancy, maternity or marital status’ - is not suitable to address complaints of discriminatory communications against groups of people rather than identifiable individuals. Recommendation 1.3 proposes adding the words ‘conduct which amount to discrimination towards any person, **people or groups of people** on the grounds ...’.

The EHRC investigation passed judgement on the effectiveness of the Labour Party’s complaints policies by assessing to what degree and with what success they upheld their own procedures. There are additional lessons to be learnt from the EHRC Labour Party investigation, especially in relation to Equality Act 2010 and Party liability in relation to the conduct of individuals defined as agents.

Thirdly, while the Party adopted our Antisemitism Statement in February 2020, insufficient reference is made to it in disciplinary hearing panel minutes.

Finally, the Board of Deputies’ submission pointed to three possible outcomes that might arise following what they described as a lack of ‘*appropriate disciplinary action*’ in relation to historical complaints:

1. *The message that leniency sends to other members in Plaid Cymru and those involved in Welsh politics regarding what is acceptable.*
2. *That antisemitism will grow within Plaid Cymru. An important element of antisemitism is a belief in conspiracy. It therefore has the capacity to grow exponentially, as conspiratorial thinking is impervious to facts, and can serve as a comforting function to those who indulge in it, as it provides a simplistic framework to understand a complicated and difficult world.*
3. *That the individual who has benefitted from the stated leniency may continue their behaviour.¹⁴*

¹⁴ Submission to Plaid Cymru Antisemitism Review, Board of Deputies of British Jews

4 Recommendations

4.1 Jewish communities and trust in Plaid Cymru’s complaint handling process

At present, all Jewish representatives who contributed to the Antisemitism Review expressed at least a degree of distrust in Plaid Cymru’s complaints procedures. In general, they regarded the Party’s processes as well-meaning but insufficiently robust and lacking in independence. They perceived the Party as prioritising internal interests over implementing publicly stated values.

Complaints procedure recommendations	
Recommendation 1.1	<p>The Party should adopt as its Antisemitism Statement the wording of the IHRA definition and illustrations in full.</p> <p>This is necessary for clarity in relation to Recommendation 1.8 below regarding the need to consider both whether conduct or rhetoric was antisemitic and whether there was intent to engage in such conduct.</p> <p>The Home Affairs Select Committee clauses are not consistent with Recommendation 1.8 as they specify the need for additional evidence of antisemitic intent.</p> <p>By including the additional clause from the illustrations of the IHRA definition, it is possible to indicate how criticism can be levelled against Israel in a way which is not antisemitic.</p>
Recommendation 1.2	<p>The Party’s Antisemitism Statement should be easily accessible on the public section of the Party’s website.</p>

<p>Recommendation 1.3</p>	<p>The Party’s Antisemitism Statement should be referenced in our Standing Orders, in which reference should also be made to the Party’s adopted Islamophobia statement and any other statements relating to protected characteristics as relevant.</p> <p>It is proposed that including the words ‘or people’ in Standing Order 3.1 ix, as shown below, will permit the principles of the Statement to be put into action. This wording would also apply to hate speech directed against all protected characteristics.</p> <p>Proposed new wording for 3.1 ix: <i>‘Conduct which amounts to discrimination towards any person, PEOPLE OR GROUPS OF PEOPLE on the grounds of any of the following characteristics: age, sex, disability, race, ethnicity, nationality, religion, belief, sexual orientation, gender reassignment, pregnancy, maternity or marital status.’</i></p> <p>The Party should seek legal advice on how best to incorporate the Antisemitism Statement in Standing Orders if this wording is deemed to be open to challenge.</p> <p>This recommendation will require a new Standing Order or new wording of Standing Order.</p>
<p>Recommendation 1.4</p>	<p>The Party should seek legal advice in relation to the Equality Act 2010 as it applies to our Complaints Procedure in general, especially regarding who is defined as an ‘agent’ under the Act, and what actions the Party should take in terms of procedure and training.</p>
<p>Recommendation 1.5</p>	<p>Hearing Panels should commission independent expert advice in relation to all complaints associated with antisemitism; this advice is to be recorded in full in Hearing Panel minutes. Issues raised by and whether or not independent advice continues to be necessary in future should be discussed in reviews as proposed in Recommendation 6.2.</p>
<p>Recommendation 1.6</p>	<p>Members who are subjects of disciplinary investigations should be given sufficient notice regarding which Standing Order(s) are under consideration in relation to the complaint against them.</p> <p>This recommendation will require a new Standing Order.</p>

<p>Recommendation 1.7</p>	<p>Hearing Panel minutes should record which Standing Orders were considered in relation to antisemitism complaints, and what their decisions were according to each Standing Order, with a rationale.</p> <p>This recommendation will require a new Standing Order.</p>
<p>Recommendation 1.8</p>	<p>All members of the MDS Committee who contribute to antisemitism hearings should have taken part in antisemitism training prior to undertaking any or further hearing panels.</p> <p>An understanding of the Macpherson Principle should be reiterated in every complaint relating to racism.</p> <p>Hearing panel members will investigate both whether conduct or rhetoric was antisemitic and whether there was intent to engage in such conduct in their records and findings. A finding of antisemitic conduct is not dependent on proof of intent, although the degree of intent will inform actions/sanctions proportionately.</p> <p>Unconscious bias training is highly recommended for everyone engaged in the complaints process.</p> <p>Consideration should be given to identifying a number of panel members to specialise in antisemitism issues in 2021, although this should not replace Recommendation 1.5.</p>
<p>Recommendation 1.9</p>	<p>The MDS Committee or other body within the Party should draw up a list of exemplar required actions and/or sanctions to apply to antisemitic conduct/ hate speech or conduct.</p> <p>Reference will be made to the list of exemplar required actions and/or sanctions in all Party/Group disciplinary procedures related to racism, antisemitism and hate speech.</p> <p>Such required actions and/or sanctions should be applicable proportionately to reflect the degree of intent, repeat behaviour and severity.</p> <p>These should, however, be identified as required actions and/or sanctions and not as discretionary recommendations by Hearing Panels.</p> <p>This recommendation will require a new Standing Order or amendment to an existing Standing Order.</p>

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<p>Recommendation 1.10</p>	<p>All complainants should be kept informed of the progress of their complaint, and also of its outcome. Their responses (if any) should be kept on the complaint file (unless this contradicts the complainant’s expressed wishes).</p>
<p>Recommendation 1.11</p>	<p>The MDS Committee should conduct an anonymised review of how all antisemitism complaints received in the 12 months following the adoption of the Antisemitism Review, and evaluate how they have been handled in terms of consistency and adherence to Standing Orders at the end of the year.</p> <p>This review to be discussed with Welsh and UK representatives of Jewish bodies, and recommendations for any future procedural changes to be agreed with those representatives.</p> <p>The Party will discuss these recommendations and decide whether to implement them according to usual procedures.</p> <p>Following the 2021 meeting, it should be discussed whether this process should be repeated annually in future years.</p>
<p>Recommendation 1.12</p>	<p>The Party should conduct a 360 degree evaluation (ie to include all stakeholders involved with or affected directly by the process) of how all complaints are handled in terms of clarity, accessibility, consistency and communications with both the person or people making the complaint or allegation and the person against whom the complaint/s and/or allegation(s) are made.</p> <p>This evaluation should consider the wider implications of Equality Act 2010 to political parties and their agents following EHRC’s Investigation into Antisemitism in the Labour Party as regards complaints arising from protected characteristics.</p>

4.2 Social media: communications protocol

All the complaints considered in this review arose from content placed voluntarily by Party representatives on social media platforms; in some instances, this comprised original text, in others it was related to the sharing of material generated by others.

Jewish representatives feel strongly about the sharing of material from certain websites (eg Expose Israel); they consider that the Party should take action to counter the sharing of material which may appear on face value to be relatively innocuous but which originates from sites which also include hate speech and politically-motivated misinformation. The Party should expect standards of due diligence among its agents (see EHRC's review of the Labour Party) because they act as public facing representatives of Plaid Cymru. They are active influencers in the public political arena, and the Party may unwittingly be in breach of Equalities Act 2010 in certain circumstances. This should, however, be proportionate, and include a wider drive to counter misinformation and an understanding of contemporary political engagement on social media.

The Party's National Executive Council adopted communication codes for councillors and candidates on 23 January 2021, which prepared the ground to help address many of the concerns raised in this review; similar communication codes have been previously adopted for Members of Senedd, Members of Parliament and Police and Crime Commissioners. These protocols should help allay concerns raised by Jewish representatives in 2020, if they are applied in full and consistently.

It is unclear, however, how these communications codes dovetail with Party Standing Orders in general. There is also opacity surrounding how the disciplinary procedures of the Senedd and Parliamentary groups align with those of the Party centrally. Additionally, it is not apparent how the code is applied to PCCs, given that there is no whip function.

There appear ultimately to be no sanctions at the disposal of group whips if the elected member continues to act in breach of protocol requirements or simply refuses to comply with whips' requests.

All these procedural issues need to be addressed.

Social media and Communication Codes recommendations	
Recommendation 2.1	<p>Further clarity is urgently needed regarding the application of Group Codes of Conduct/Communication Codes (ie for Members of Senedd, Members of Parliament, PCCs, councillor and candidates) and the Party's centralised disciplinary procedure.</p> <p>See also Recommendation 1.9 re sanctions, which should apply to all relevant cohorts.</p> <p>This recommendation is likely to require a new Standing Order.</p>
Recommendation 2.2	<p>A programme of training to accompany the Communication Codes should be compulsory for all new members of each of the relevant cohorts, and available (possibly as a required action or sanction option, but also more generally) as necessary for more experienced members.</p>
Recommendation 2.3	<p>Communication Code training should include:</p> <ul style="list-style-type: none"> • discussion of the need for due diligence when sharing social media material • the role of elected members and candidates as representatives of Plaid Cymru and political influencers/leaders within their communities and beyond, and ethics related to these roles • reference to the list of exemplar required actions/sanctions which could be applied in the event of an upheld complaint to the Party's disciplinary committee

4.3 National Candidate Register

The Party should review its processes in relation to admitting members onto the National Candidate Register for the first time, its ongoing support for those members while they are on the register and provide greater clarity regarding the circumstances in which people may be removed from the register.

The Party has a duty of care towards members on the National Register as it is anticipated that they will be placed under close public scrutiny in the name of Plaid Cymru. People with protected characteristics are vulnerable to sustained abuse on social media - for example, BME women, LGBTQIA+ people - and the Party needs to plan to support them appropriately to the best of our ability.

As a general statement, it appears on occasion that the Party does not always carry out due diligence when new members are inducted on to the National Register. The Party, rightly, aspires to inclusivity, and we have a duty to strive to attract people from across the diverse communities of Wales. We should, however, be alert to the potential of entryism. While former members of other political parties will often be welcomed into our ranks, we need to have due regard to both safeguarding our core values and the potential for reputational damage to the Party if some individuals bring proven antisemitic views with them.

National Candidate Register Recommendations	
Recommendation 3.1	<p>Previous social media presence should be the subject of recorded scrutiny for all National Register candidates prior to their acceptance onto the Register.</p> <p>This should take the form of a contractual agreement on the part of the candidate that they have revealed all previous social media postings which might reasonably prove problematic for the Party in future. Failure to reveal such postings which later prove to be reputationally injurious to Plaid Cymru should be a disciplinary matter which should by default result in the individual in question being removed from the register. They might seek to be reinstated in future under certain circumstances or when certain requirements have been fulfilled.</p>

	<p>If problematic historical postings are revealed, the Party needs a process to adjudicate whether the individual’s application to the National Register is still acceptable or not. If there is a decision to proceed and the applicant is successful, a remedial plan should be put in place to deal with such postings, both immediately and in preparation for hostile political attacks in future.</p> <p>Thorough, confidential record keeping should be maintained.</p> <p>This recommendation is likely to require a new Standing Order.</p>
<p>Recommendation 3.2</p>	<p>The Party should maintain a record of what diversity training applicants for National Candidates Register have previously undertaken, and consider whether a similar record (ie via questionnaire) might be kept for all applicants for internal roles.</p> <p>See also Recommendations 2.2 and 5.2.</p>
<p>Recommendation 3.3</p>	<p>The Party’s duty of care towards all our candidates should be enhanced.</p> <p>National Register candidates with identified protected characteristics (ie BME candidates, especially women, and others) should have a long-term support network provided by the Party in anticipation of debilitating social media harassment.</p> <p>The nature of this support needs further discussion.</p>
<p>Recommendation 3.4</p>	<p>The potential risks of entryism warrant further consideration: Plaid Cymru needs to ensure that the Party’s core values are made explicit to new members, and that they commit to upholding those values.</p> <p>Plaid Cymru should always seek to offer broad political welcome and to promote diversity, while also upholding the Party’s principles.</p> <p>This recommendation may require a new Standing Order.</p>

4.4 The Party's engagement with BME communities and political issues

Plaid Cymru declares a constitutional aim of building '*a national community based on equal citizenship, respect for different traditions and cultures and the equal worth of all individuals, whatever their race, nationality, gender, colour, creed, sexuality, age, ability or social background*'. The Party should therefore explicitly seek to apply this core value in all its activities.

Engaging with BME communities	
Recommendation 4.1	Further support should be available to Plaid BME section and the Director of Equality on the NEC as they contribute to a greater Party understanding of diversity and broader engagement with people from different communities in Wales.
Recommendation 4.2	<p>The Party should continue to seek to attract members and potential National Register candidates from Wales's BME communities.</p> <p>Structural issues which may either directly or indirectly prevent or deter such people from participating in Plaid Cymru should be identified and remedied to the best of our abilities.</p> <p>See also Recommendation 3.3</p>
Recommendation 4.3	The Party should seek opportunities to employ or offer paid internships to people from BME communities, and use such opportunities as a means to learn about the effect of direct and indirect discrimination in Welsh institutions, to normalise the experience of people from BME communities within the Party's political culture, and to encourage further participation from such communities.

<p>Recommendation 4.4</p>	<p>Point 4 of the Terms of Reference states:</p> <p><i>To consider whether any issues identified in the course of the review are relevant to broader areas of prejudice, including Islamophobia, racism and discrimination against any other protected characteristic, and to make further recommendations related to Party policies, procedures and structures on that basis.</i></p> <p>This issue is not felt to have been adequately explored in the timeframe and capacity to hand for the Antisemitism Review.</p> <p>It is recommended that further consultation regarding Party policy and culture is held with Muslim Council of Wales; Plaid Cymru BME section, NEC Director of Equalities and other anti-racism organisations this year; and with LGBTQIA+ groups and representatives with equal priority.</p> <p>Other protected characteristics will warrant similar discussion as soon as possible.</p>
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4.5 Establishing a culture that does not tolerate antisemitism

Changing an organisation's culture is difficult to measure in terms of performance criteria and outcomes within a specific timeframe. Certain activities have been suggested during the review's consultation. These form the following recommendations.

Culture change	
Recommendation 5.1	<p>Arrange for representatives of Welsh/UK Jewish bodies to consider the recommendations of this report and its final text prior to its publication, with the aim of holding a launch event with the Party Leader playing a prominent role.</p>
Recommendation 5.2	<p>Continue to provide antisemitism training for all candidates, newly-admitted members of the National Candidate Register and Tŷ Gwynfor officers who did not attend the training sessions on 6 November and 14 December 2020.</p> <p>This training should also be available to any member of Plaid Cymru. Antisemitism training should be regarded as an on-going process rather than a one-off event, as manifestations of antisemitism are constantly evolving.</p> <p>Invite members of the Welsh Jewish community to observe and/or take part in antisemitism training offered by Plaid Cymru in future.</p>
Recommendation 5.3	<p>The Director of Equalities to assess the value of:</p> <ol style="list-style-type: none"> i. holding unconscious bias training to similar cohorts, including all fulltime elected representatives ii. arranging a broad programme of training related to protected characteristics iii. conduct internal party discussion in relation to antisemitism of the Left and unconscious bias, with a view to arranging on-going events both public-facing and within Plaid Cymru

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Recommendation 5.4	<p>With Plaid BME and the Director of Equalities, consider the contemporary literature and other resources available to inform public debate of the Israeli-Palestinian conflict in a non-toxic way, and arrange ongoing discussion/training to enable such debate without racism or antisemitism.</p> <p>This might include supporting in the Board of Deputies' Invest in Peace programme, in which an Israeli and a Palestinian explain how their lives have influenced their viewpoints, and answer questions.</p>
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4.6 Sustaining culture change

It is to be expected that further complaints of antisemitism are almost inevitable. These complaints should be treated as an opportunity rather than a threat, as they will enable the Party to stress-test the changes recommended in this Review.

In the immediate 12-month period, success in terms of the Party's engagement with tackling antisemitism needs to include ongoing and constructively self-evaluating conversations with Jewish organisations in Wales and beyond.

The successful implementation of Recommendation 6.1 - namely, the commissioning and adoption of an Antisemitism Action Plan by Plaid Cymru's National Executive Committee - will lay the foundation for wider culture changes which can only strengthen the Party's good name in future.

Success criteria	
Recommendation 6.1	The NEC to commission and adopt an Antisemitism Action Plan with clear demarcation of responsibility and calendar of actions, including but not limited to the recommendations of the final version of Plaid Cymru's Antisemitism Review.
Recommendation 6.2	The Party Leader to conduct reflective discussions with Jewish representatives at least twice during 2021 to evaluate progress against the Party's Antisemitism Action Plan, and to maintain regular contact into the future.

