



**Independent Commission for
Reconciliation and Information
Recovery**

Code of Conduct

December 2023

Table of Contents

Introduction	3
The Commission's Code of Conduct Values.....	4
Our Values and Standards of Professional Behaviour	5
Adherence to the Code	8
After Leaving ICRIR Employment.....	9

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Introduction

- 1.1 The Independent Commission for Reconciliation and Information Recovery (ICRIR) has the principal objective of promoting reconciliation. It will seek to achieve this through recovery of information about deaths and serious injuries for victims, survivors and their families, using its unique powers to obtain evidence without fear or favour wherever it may be held. The credibility of the Commission will be paramount to achieve this, and it will be of the utmost importance that mechanisms are in place to enable the body to uphold its values and create the right culture.
- 1.2 The Commission is also under a duty not to do anything which would put the life or safety of anyone at risk, have a prejudicial effect on any actual or prospective criminal prosecution or prejudice or risk prejudicing national security interests of the United Kingdom.
- 1.3 The Commission should operate to high standards to gain public trust and confidence. This Code of Conduct sets out the principles for how all in the Commission should act, from Commissioners, to investigative officers and corporate support officers. It covers those on secondment, loans, fixed term contracts, via agencies and contracted arrangements.
- 1.4 This Code will assist you in how you conduct yourself on behalf of the Commission. It is supplemented by specific policies and procedures that the Commission has adopted in certain areas to elaborate on the values set out above. In circumstances where such policies and procedures do not specifically set out a course of action, these values should inform how you behave. If you are in doubt about the interpretation of the Code, please speak to your Line Manager in the first instance.
- 1.5 The Code should be read alongside and in addition to the ***Seven Principles of Public Life*** and other professional standards obligations that apply to specific cadres of staff within the Commission, for example those designated with the powers of a police constable, legal professionals, or those from other professions.

Code of Conduct

The Commission's Code of Conduct Values

2.1 Integrity

Putting the obligations of public service above your own personal interests. Acting in line with other applicable professional obligations and standards.

2.2 Impartiality

Behaving in a fair and objective manner, treating all equally, remaining open minded and taking decisions based on evidence.

2.3 Openness

Being truthful and straightforward in your communications and your engagement while respecting confidences and keeping information safe.

2.4 Accountability

Operating within legal requirements, including the European Convention on Human Rights, the Equality Act 2010 and equivalent equality legislation in Northern Ireland, the requirements of the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023, and within the objectives and policies of the Commission. Being willing to justify decisions, actions and omissions.

2.5 Respect

Treating everyone with whom you interact with courtesy, irrespective of their background or beliefs. Engaging in constructive, respectful and professional dialogue even in the case of differing opinions.

Our Values and Standards of Professional Behaviour

Integrity

3.1 You will

- Put the interests of the public above your own or any individual or organisation
- Fulfil your duties and obligations in a professional and responsible manner
- Act with honesty and professionalism at all times so as to retain the confidence of all those with whom you engage
- Declare all relevant interests and actively consider where conflicts may arise between your interests and your official duties, in line with the *Declaration and Management of Outside Interests Policy*.

3.2 You will not

- Act in a manner which undermines public confidence in you or the Commission
- Misuse your official position or information acquired in the course of your official duties to further your private interests or those of others (this duty of confidentiality endures beyond your time at the Commission).
- Use the Commission's resources for purposes other than the business of the Commission.
- Use your position to receive, agree to accept or attempt to obtain any payment, benefit or consideration for doing, or not doing, anything or showing favour, or disfavour, to any person (whether received from that person or another).
- Accept hospitality, gifts or other benefits from anyone which might reasonably be seen to compromise your personal judgement and decision making. You are expected to familiarise yourself with the *Gifts and Hospitality Policy* which sets out rules as to how any offers should be handled.

Impartiality

4.1 You will

- Seek to understand different views and perspectives and avoid forming judgements without objective evidence to support them
- Treat people fairly in the work you do and avoid any personal or professional bias

- Carry out your responsibilities in a way that is fair, just and equitable, and reflects the Commission's commitment to equality and diversity

4.2 You will not

- Do anything which would risk having, or would have, a prejudicial effect on any actual or prospective criminal proceedings in any part of the United Kingdom.
- Be involved in a case where you have a previous or current connection.
- Act in a way that unjustifiably favours or discriminates against particular individuals or interests
- Allow your personal views to determine any advice you give, decisions you make or your actions..

Openness

5.1 You will

- Be open and honest in your engagement with the public, explaining your and the Commissions activities where possible, and explaining why it may not be possible to share all information requested where that is the case
- Be truthful and accurate in your statements, and correct any errors as soon as possible
- Consider other perspectives and communicate in a way that can be widely understood, avoiding ambiguity and obfuscation.
- Treat information provided to you from any source – including survivors, victims, and witnesses – with sensitivity, care and ensure that it is only disclosed with proper lawful authority. Officers of the ICRIR owe a general duty of confidentiality to the Commission under civil law. consider your use of social media. Social media is a public forum and the same considerations, including the provisions of this Code, apply as would to speaking in public or writing something for publication, either officially or in a personal capacity.

5.2 You will not

- Ignore different views or perspectives or act in a way that is closed minded to challenge and scrutiny
- Act in a way that puts information that is in your or the Commission's possession at risk
- Disclosure any information without proper authority

Accountability

6.1 You will

- Ensure you use public money and other resources properly and efficiently and challenge others to do the same.
- Take full responsibility for, and be prepared to explain and justify, your actions and decisions, being open about mistakes and learning from them
use all information, training, equipment and management support you are provided with to keep yourself up to date on your role and your responsibilities with regards to data handling.
- Consider how your behaviour and that of colleagues meets the standards expected and challenge colleagues where you consider it falls short, being open to such challenge from others about your own actions.
- Meet applicable legal requirements, including the European Convention on Human Rights and the provisions of the Northern Ireland Troubles Act

6.2 You will not

- Undertake any conduct which would cause the Commission to breach its statutory duties, including to put life or national security at risk
- Avoid scrutiny or legitimate requests to give account of actions or conceal such matters from colleagues and senior leaders
- Circumvent policies and procedures to allow for concerns to be raised in a formal manner. The Commission's *Raising a concern* policy sets out routes for raising concerns in a formal manner.
- Act beyond the remit of your official role.

Respect

7.1 You will

- Recognise the importance of a trauma-informed approach and consider how your actions can meet this.
- Treat all individuals with courtesy and compassion, irrespective of their background, beliefs, or status, fostering a culture of inclusivity.
- Engage in constructive and professional dialogue even in the case of differing opinions, being humble and open to different perspectives.
- Consider, in all that you do, how the Commission's principal objective, to promote reconciliation, can be furthered.

7.2 You will not

- Behave in a way that may be perceived as dismissive or does not acknowledge the feelings of those with whom you are engaging

Adherence to the Code

8.1 There may be times when behaviour does not adhere to the values set out in the Code. Such conduct may not always give rise to a disciplinary matter or constitute misconduct. However, where the allegation of a breach of the Code is more serious this may give rise to investigation under the Commission's Conduct and Discipline Policy.

8.2 You should familiarise yourself with the contents of the Code and should act in accordance with the values set out in it. Failure to adhere to the Code or the requirements of the Code could be a breach of the **Conduct and Discipline Policy** and your contract of employment.

8.3 If you are concerned that you have witnessed / seen evidence of behaviour, or are being asked to behave in a manner which:

- Is illegal, improper, or unethical.
- Is in breach of this Code or any other professional code.
- May involve possible maladministration, fraud or misuse of public funds; or

- Is otherwise inconsistent with this Code.

Then you should raise this with your Line Manager or with Human Resources. If you do not feel able to do so, then you should consider raising the matter with a member of the Executive Committee. If your concern remains, then you should follow the procedure set out in the ***Raising a Concern Policy***.

- 8.4** The ICRIR's **Raising a Concern policy** sets out the whistleblowing procedures for staff, which are in accordance with the Public Interest Disclosure Act 1998 in Great Britain and the Public Interest Disclosure (Northern Ireland) Order 1998 in Northern Ireland.

After Leaving ICRIR Employment

- 9.1** Staff in the ICRIR should continue to observe their duty of confidentiality and any statutory requirements relating to sensitive information after they have left the employment of the ICRIR and should be aware of and abide by any rules on the acceptance of business appointments after resignation or retirement.

Associated Policies

Policy	Issue Date
ICRIR Declaration and Management of Outside Interests Policy	September 2023
ICRIR Raising a Concern Policy	December 2023
ICRIR Conduct & Discipline Policy	December 2023
ICRIR Gifts & Hospitality Policy	December 2023
ICRIR Information Risk Policy	December 2023