

Screening

Policy scoping

Information about the policy

Name of the policy – Policy for the declaration and management of outside interests

Is this an existing, revised or a new policy? – Revised

What is it trying to achieve? (intended aims/outcomes):

Intended aims

1. **Safeguard impartiality and integrity**
Ensure that staff and contractors do not allow personal, financial, or professional interests to compromise or appear to compromise their judgment or conduct.
2. **Promote transparency and accountability**
Require the declaration of outside interests at key stages (recruitment, onboarding, annually, and when circumstances change) to maintain openness in decision-making.
3. **Prevent and manage conflicts of interest**
Identify actual, potential, or perceived conflicts early and apply appropriate mitigation strategies (e.g. restriction, removal, relinquishment).
4. **Support compliance with public standards**
Align with the Seven Principles of Public Life and anticipate statutory duties under the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023.
5. **Extend ethical standards beyond staff**
Apply the policy to contractors, consultants, and other non-Commission personnel, ensuring consistent ethical standards across all contributors.
6. **Protect public confidence in the Commission's work**
By proactively managing risks to impartiality, the policy aims to uphold the credibility and trustworthiness of the Commission's investigations and findings.

Intended outcomes:

1. A central, secure register of declared interests.

2. Clear procedures for assessing and mitigating conflicts.
3. Regular oversight through bi-annual compliance reporting.
4. A culture of ethical awareness and proactive risk management.
5. Legal and procedural alignment with future statutory obligations.

Are there any S75 categories which might be expected to benefit from the intended policy? If so, explain how.

1. Religious belief / Political opinion / Racial group

- **How they benefit:**
The policy helps ensure that individuals involved in investigations or decision-making are not influenced by personal affiliations or biases. This is especially important in Northern Ireland, where historical divisions along these lines remain sensitive.
- **Impact:**
By requiring declarations of outside interests and managing conflicts, the policy supports impartiality and reduces the risk of perceived bias, which is crucial for communities historically affected by the Troubles.

2. Disability

- **How they benefit:**
The policy promotes fair treatment by ensuring that decisions are made based on merit and evidence, not influenced by external interests that could disadvantage disabled individuals.
- **Impact:**
It supports inclusive practices by requiring transparency and accountability in roles that may affect service delivery or access.

3. Gender / Sexual orientation / Marital status / Dependents

- **How they benefit:**
While not directly targeted, these groups benefit from the policy's emphasis on fairness, integrity, and the removal of undue influence in decision-making.
- **Impact:**
The policy helps create a workplace and service environment where decisions are less likely to be skewed by personal relationships or interests, which can disproportionately affect individuals in these categories.

4. Age

- **How they benefit:**

The policy ensures that older or younger individuals are not disadvantaged due to staff members' external affiliations or assumptions.

- **Impact:**

Promotes equal treatment in recruitment, investigations, and service provision.

Who initiated or wrote the policy?

Initiator: General Counsel

Author: Briefings Officer

Who owns and who implements the policy?

The policy is owned by the Commission and is implemented by Human Resources, with operational responsibility shared across all Directorates and Sub-Directorates.

Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

Contributing factors (positive influences)

1. Clear definitions and guidance

- The policy provides detailed definitions of actual, potential, and perceived conflicts of interest, helping staff understand what to declare and when.

2. Structured declaration process

- Declarations are required at multiple stages (recruitment, onboarding, annually, and upon change), which supports ongoing transparency and accountability.

3. Mitigation strategies

- Annex 1 outlines practical strategies (e.g. restrict, remove, relinquish) to manage conflicts, allowing tailored responses based on risk level.

5. Oversight and governance

- Bi-annual compliance reporting to the Executive Leadership Team and Audit and Risk Committee ensures institutional oversight and reinforces adherence.

6. Extension to non-Commission personnel

- Including contractors and consultants broadens the policy's reach and reduces risk from external influences.

7. Alignment with statutory duties

- The policy anticipates future legal obligations under the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023, ensuring readiness and compliance.

Detracting factors (risks or barriers)

1. Inconsistent application or oversight

- If line managers or HR staff do not consistently review or act on declarations, conflicts may go unmanaged, undermining the policy's effectiveness.

2. Lack of awareness or understanding

- Staff may not fully understand what constitutes a relevant interest, especially perceived conflicts, leading to under-declaration.

3. Reluctance to declare

- Individuals may fear negative consequences or stigma from declaring interests, particularly if they involve sensitive personal relationships or past affiliations.

4. Complexity in assessing interests

- Some interests may be difficult to assess objectively, especially where perceived bias is involved, leading to inconsistent mitigation decisions.

5. Exemptions for external professionals

- While exemptions may be justified, they could create loopholes if not rigorously assessed and documented, especially for roles with access to sensitive information.

Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon? (please delete as appropriate) staff service users other public sector organisations, voluntary/community/trade unions, other, please specify:

Internal stakeholders

- **Staff**
All Commission employees, including permanent, fixed-term, probationary, and secondees, are directly affected. They must declare outside interests and comply with mitigation measures.
- **Line managers and HR personnel**
Responsible for reviewing declarations, applying mitigations, and ensuring compliance.
- **Executive Leadership Team and, Audit and Risk Committee**
Receive bi-annual compliance reports and oversee governance.

External stakeholders

- **Contractors, consultants, and agency workers**
Expected to comply with the policy unless exempted. Their interests may affect impartiality in investigations or decision-making.
- **Other public sector organisations**
May be involved in joint work or investigations. The policy helps ensure transparency and trust in inter-agency collaboration.
- **Voluntary/community sector and trade unions**
Could be indirectly impacted if their members are involved in Commission work or investigations. The policy helps safeguard fairness and impartiality.
- **Service users (e.g. bereaved families, witnesses)**
While not directly subject to the policy, they benefit from its outcomes, namely, impartial investigations and ethical conduct by Commission personnel.

Other policies with a bearing on this policy

What are they?

- ICRIR Code of Conduct
- Conflicts in Investigations Policy
- Gifts and Hospitality Policy
- Vetting Policy
- Raising a Concern Policy
- Recruitment Principles
- Equality Scheme 2024–2029

Who owns them?

The Commission owns our policies.

Available evidence

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories.

1. Age:

Evidence/information used (implied or indirect)

- **Qualitative:**
The policy reflects best practice in public sector governance and ethical standards, which are informed by general principles of fairness and non-discrimination. These principles inherently consider age-related impacts, especially in recruitment and role assignment.
- **Quantitative:**
No specific age-related data (e.g. workforce age demographics, age-related complaints, or audit findings) is cited in the policy.

How age may be considered

- The policy applies to all staff regardless of age, including those at different career stages (e.g. early-career, mid-career, nearing retirement).
- It ensures that decisions (e.g. recruitment, role allocation, conflict management) are based on declared interests rather than assumptions linked to age.
- It may help prevent age-related bias in decision-making by requiring transparency and impartiality.

2. Disability:

Evidence/information used (implied or indirect)

- **Qualitative:**
The policy is grounded in principles of fairness, impartiality, and transparency, which align with disability-inclusive practices. It emphasises that decisions must not be influenced by personal interests, which helps protect disabled individuals from discrimination or bias in recruitment, role allocation, or investigations.
- **Quantitative:**
The policy does not cite specific disability-related data (e.g. staff disability profiles, accessibility audits, or complaints). However, it references compliance with the UK GDPR and the ICRIR Equality Scheme 2024–2029.

How disability may be considered

- The policy applies equally to all staff, including those with disabilities, and requires that any conflicts of interest be declared and managed fairly.
- It supports disabled staff by ensuring that decisions are based on merit and ethical standards, not influenced by external interests or assumptions.
- The emphasis on transparency and accountability helps foster a workplace culture that is respectful of diverse needs, including reasonable adjustments.

3. Gender reassignment:

Evidence/information used (implied or indirect)

- **Qualitative:**
The policy is grounded in principles of impartiality, integrity, and transparency. While it does not explicitly reference gender reassignment, its universal application to all staff and contractors, regardless of gender identity or transition status—supports inclusive practice.
- **Quantitative:**
No specific data on staff or service users who have undergone or are undergoing gender reassignment is cited in the policy.

How gender reassignment may be considered

- The policy helps ensure that decisions (e.g. recruitment, role allocation, conflict management) are not influenced by personal bias or undeclared interests, which can disproportionately affect individuals from marginalised gender identities.
- By requiring declarations of outside interests and managing perceived bias, the policy indirectly supports a fair and respectful working environment for transgender and non-binary individuals.
- The emphasis on public confidence and ethical conduct may help protect against discrimination or exclusion based on gender identity.

4. Marriage and civil partnership:

Evidence/information used (implied or indirect)

- **Qualitative:**
The policy includes guidance to consider the interests of close family members, including spouses and civil partners, when declaring outside interests. This reflects an understanding that personal relationships can intersect with professional responsibilities and potentially give rise to perceived or actual conflicts of interest.
- **Quantitative:**
No specific data on marital or civil partnership status (e.g. staff demographics, conflict cases involving spouses) is cited in the policy.

How marriage and civil partnership may be considered

- The policy encourages staff to reflect on whether relationships with spouses or civil partners could reasonably be perceived as affecting impartiality.
- It supports transparency and fairness by requiring declaration of interests that arise from these relationships, helping to prevent bias or undue influence.
- This approach helps protect individuals in these categories from assumptions or unfair scrutiny, while also safeguarding the integrity of decision-making.

5. Pregnancy and maternity:

Evidence/information used (implied or indirect)

- **Qualitative:**
The policy does not explicitly reference pregnancy or maternity. However, its emphasis on fairness, transparency, and the proactive management of conflicts of interest supports an inclusive working environment. This indirectly benefits individuals who may

be pregnant or on maternity leave by ensuring that decisions are not influenced by personal biases or external interests.

- **Quantitative:**

No specific data (e.g. staff pregnancy/maternity rates, related complaints or audits) is cited in the policy.

How pregnancy and maternity may be considered

- The policy applies equally to all staff, including those who may be pregnant or on maternity leave, ensuring consistent expectations around declarations and impartiality.
- It helps protect individuals from being unfairly excluded from decision-making or professional opportunities due to assumptions about availability or commitment.
- The requirement to declare relevant outside interests ensures that any decisions affecting staff, such as role changes or project assignments, are made transparently and ethically.

6. Race (including colour, nationality, and ethnic or national origin):

Evidence/information used (implied or indirect)

- **Qualitative:**

The policy is grounded in principles of impartiality, integrity, and transparency, which are essential in ensuring fair treatment across racial and ethnic groups. It requires staff to declare any personal or professional relationships that could give rise to perceived bias, including those based on shared ethnic or national affiliations.

- **Quantitative:**

The policy does not cite specific data on racial or ethnic diversity within the Commission or among service users. However, it aligns with broader public sector equality duties and the ICRIR Equality Scheme 2024–2029.

How race may be considered

- The policy helps prevent decisions being influenced by racial or ethnic affiliations, whether consciously or unconsciously, by requiring the declaration of relevant outside interests.
- It supports public confidence in the Commission's impartiality, particularly among communities historically affected by racial or sectarian bias.
- By applying the policy to all staff and contractors, it ensures consistent standards regardless of background, helping to mitigate risks of discrimination or favouritism.

7. Religion or belief:

Evidence/information used (implied or indirect)

- **Qualitative:**

The policy is designed to uphold impartiality and public confidence in a post-conflict context where religious and political identities are deeply interwoven. It requires staff to declare any personal or professional relationships that could give rise to perceived bias, including those based on religious affiliation or belief.

- **Quantitative:**

No specific data on religious affiliation among staff or service users is cited in the policy. However, the policy aligns with the ICRIR Equality Scheme 2024–2029, which likely draws on demographic data and consultation with affected communities.

How religion or belief may be considered

- The policy helps prevent decisions being influenced by religious affiliations or beliefs, whether consciously or unconsciously.
- It supports transparency in a context where religious identity has historically shaped public trust and perceptions of fairness.
- By requiring the declaration of interests that could affect impartiality, the policy helps mitigate risks of sectarian bias or perceived favouritism.

8. Sex and sexual orientation:

Evidence/information used (implied or indirect)

- **Qualitative:**

The policy does not explicitly reference sex or sexual orientation. However, its emphasis on impartiality, transparency, and the declaration of personal relationships, including close friends and family, suggests an inclusive approach that indirectly supports individuals across the spectrum of sex and sexual orientation.

- **Quantitative:**

No specific data (e.g. staff gender breakdown, LGBTQ+ representation, or related complaints) is cited in the policy. However, the policy aligns with the ICRIR Equality Scheme 2024–2029.

How sex and sexual orientation may be considered

- The policy applies equally to all staff, regardless of sex or sexual orientation, ensuring consistent expectations around declarations and ethical conduct.

- It helps prevent bias or favouritism based on personal relationships, including those involving same-sex partners or gender identity.
- By requiring declarations of interests that could affect impartiality, the policy supports fair treatment and helps mitigate risks of discrimination.

9. Political opinion (Northern Ireland specific):

Evidence/information used (implied or indirect)

- **Qualitative:**
The policy is developed within the context of Northern Ireland's post-conflict environment, where political opinion is closely tied to identity, community affiliation, and historical experience. It emphasises impartiality and the declaration of interests that could give rise to perceived bias, particularly relevant in a setting where political affiliations may influence public trust.
- **Quantitative:**
No specific data on political opinion (e.g. staff affiliations, community background, or public perception metrics) is cited in the policy. However, the policy aligns with the ICRIE Equality Scheme 2024–2029.

How political opinion may be considered

- The policy helps prevent decisions being influenced by political affiliations or associations, whether actual or perceived.
- It supports public confidence in the Commission's neutrality, especially among communities with differing political perspectives.
- By requiring declarations of interests, including past affiliations or relationships, it helps mitigate risks of perceived bias in investigations and governance.

Sources for gathering data:

- Best practice in public sector governance.
- The Seven Principles of Public Life.
- Anticipated statutory duties under the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023.
- Internal operational needs (e.g. recruitment, onboarding, role changes).
- Ethical standards and risk management frameworks (e.g. National Audit Office definition of conflict of interest).
- Alignment with other Commission policies (e.g. Code of Conduct, Equality Scheme 2024–2029).

Needs, experiences and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy/decision?

1. Age

- **Needs:** Fair treatment across all age groups, especially in recruitment and role allocation.
- **Experiences:** Older staff may have more external affiliations; younger staff may be navigating early career networks.
- **Priorities:** Ensuring that age does not influence perceptions of bias or decisions about capability or impartiality.

2. Disability

- **Needs:** Accessibility in declaration processes and reasonable adjustments in conflict management.
- **Experiences:** Disabled staff may face assumptions about capacity or impartiality.
- **Priorities:** Transparent and fair treatment, with safeguards against discrimination or exclusion.

3. Gender reassignment

- **Needs:** Respect for identity and privacy in declarations.
- **Experiences:** Risk of perceived bias or misunderstanding in professional relationships.
- **Priorities:** Protection from discrimination and assurance that declarations won't lead to unfair scrutiny.

4. Marriage and civil partnership

- **Needs:** Recognition of how personal relationships may intersect with professional roles.
- **Experiences:** Potential for perceived conflicts due to spousal or partner affiliations.
- **Priorities:** Fair assessment of interests without penalising individuals for lawful relationships.

5. Pregnancy and maternity

- **Needs:** Protection from bias in role allocation or conflict assessments.
- **Experiences:** Risk of exclusion from decision-making or assumptions about availability.
- **Priorities:** Ensuring declarations and mitigations do not disadvantage those on leave or expecting.

6. Race (Including colour, nationality, ethnic or national origin)

- **Needs:** Assurance that decisions are not influenced by racial or ethnic affiliations.
- **Experiences:** Historical mistrust or underrepresentation may heighten sensitivity to perceived bias.
- **Priorities:** Transparency and impartiality in all declarations and conflict assessments.

7. Religion or belief

- **Needs:** Respect for religious affiliations and beliefs in assessing outside interests.
- **Experiences:** Potential for perceived bias in post-conflict Northern Ireland.
- **Priorities:** Confidence that religious identity will not affect impartiality or fairness.

8. Sex and sexual orientation

- **Needs:** Equal treatment regardless of gender or sexual orientation.
- **Experiences:** Risk of assumptions or bias in assessing relationships or affiliations.
- **Priorities:** Inclusive language and fair conflict management that respects diverse identities.

9. Political opinion (Northern Ireland specific)

- **Needs:** Protection from bias linked to political history or affiliations.
- **Experiences:** High sensitivity to perceived partiality in investigations or governance.
- **Priorities:** Robust declaration and mitigation processes to uphold public confidence across communities.

Part 2. Screening questions

Introduction

1. **What is the likely impact on equality of opportunity for those affected by this policy for each of the Section 75 equality categories?**

Religious belief

- **Likely impact:**
The policy promotes impartiality and requires declaration of interests that could be influenced by religious affiliation. This helps prevent bias and supports fair treatment.
- **Level of impact: Minor**

Political opinion

- **Likely impact:**
In Northern Ireland's post-conflict context, political opinion is a sensitive issue. The policy's emphasis on transparency and impartiality helps mitigate risks of perceived bias and supports public confidence.
- **Level of impact: Minor**

Racial groups

- **Likely impact:**
The policy applies universally and supports fair treatment by requiring declarations that prevent decisions being influenced by racial or ethnic affiliations.
- **Level of impact: Minor**

Age

- **Likely impact:**
The policy ensures that staff of all ages are treated fairly in recruitment and role allocation, regardless of external affiliations or assumptions.
- **Level of impact: Minor**

Marital status

- **Likely impact:**
The policy includes spouses and civil partners in its scope for conflict declarations, helping to ensure fair treatment.
- **Level of impact: Minor**

Sexual orientation

- **Likely impact:**
The policy's inclusive approach to personal relationships supports fair treatment of individuals regardless of sexual orientation.
- **Level of impact: Minor**

Men and women

- **Likely impact:**
The policy applies equally to all genders and supports fair treatment in recruitment, role allocation, and conflict management.
- **Level of impact: Minor**

Disability

- **Likely impact:**
The policy supports transparency and ethical decision-making, which helps protect disabled individuals from bias or exclusion. However, it does not explicitly address accessibility in the declaration process.
- **Level of impact: Minor**

Dependants

- **Likely impact:**
The policy encourages consideration of close family relationships, which may include dependants. This supports fair treatment in conflict assessments.
- **Level of impact: Minor**

2. **Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories? No**

The policy is already designed to apply universally and consistently across all staff and contractors, regardless of their background or identity.

It promotes:

- Transparency through mandatory declarations of outside interests.
- Impartiality by requiring the management of actual, potential, and perceived conflicts.
- Fairness by aligning with the Seven Principles of Public Life and the ICRIR Equality Scheme 2024–2029.

It does not introduce barriers or exclusions for any Section 75 category, and its implementation is not expected to result in unequal treatment. Therefore, no further opportunities to promote equality of opportunity have been identified within the scope of this specific policy.

3. **To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group?**

Religious belief

- **Assessment:**
The policy requires staff to declare interests that could be influenced by religious affiliation and ensures decisions are made impartially. In Northern Ireland, where religious identity is historically linked to community division, this proactive approach contributes meaningfully to trust and reconciliation.
- **Level of impact: Major**
Justification: The policy has a positive and proactive impact on good relations by directly addressing a historically sensitive area and promoting transparency.

Political opinion

- **Assessment:**
The policy is highly relevant in a post-conflict setting where political opinion can influence perceptions of fairness. By requiring declarations and managing perceived bias, it helps build public confidence across politically diverse communities.
- **Level of impact: Major**
Justification: The policy actively supports good relations in a politically divided society by promoting neutrality and ethical conduct.

Racial groups

- **Assessment:**

While the policy does not directly target race relations, its universal application and emphasis on fairness and impartiality help prevent discrimination and support inclusive practice. However, it does not include specific measures to address racial inequality or promote intercultural understanding.

- **Level of impact: Minor**

Justification: The impact is positive but indirect. It supports good relations through fair treatment but does not actively promote racial integration or dialogue.

4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group? No

Justification: The policy already contributes positively to good relations by:

- Requiring the declaration and management of outside interests that could give rise to perceived bias, including those linked to religion, politics, or ethnicity.
- Promoting impartiality, transparency, and ethical conduct across all staff and contractors.
- Supporting public confidence in the fairness and neutrality of the Commission's work, particularly in a post-conflict Northern Ireland context.

It does not introduce any practices that would undermine good relations, nor does it exclude any group. Therefore, no further opportunities to promote good relations have been identified within the scope of this specific policy.

Additional considerations

Post-conflict sensitivities:

The policy operates within a Northern Ireland context where religious belief, political opinion, and community identity are historically sensitive. Its emphasis on impartiality and transparency is essential to maintaining public trust.

Universal application:

The policy applies to all staff, contractors, and committee members, ensuring consistency and fairness across roles and employment types.

Intersectionality:

While the policy addresses individual categories, some individuals may belong to multiple

Section 75 groups. The declaration process should remain sensitive to overlapping identities and experiences.

Data protection and confidentiality:

The policy includes safeguards for handling declarations under UK GDPR, which is particularly important for protecting sensitive personal information related to identity, relationships, or affiliations.

Alignment with broader equality frameworks:

The policy complements the ICRIR Equality Scheme 2024–2029 and other governance policies, reinforcing the Commission’s commitment to equality and good relations.

No evidence of adverse impact:

Based on the screening, there is no indication that the policy will negatively impact any Section 75 category. Instead, it supports ethical conduct and public confidence.

Part 3. Screening decision

Screening outcome:

Decision: Screened out

Mitigation

Approval and authorisation

Screened by:

Position/Job title: Briefings Officer

Date: 3 November 2025

Reviewed by:

Position/Job title: Chief of Staff

Date: 3 November 2025

Approved by:

Position/Job title: Director of People and Culture

Date: 17 November 2025