

Screening

Policy scoping

Information about the policy

Policy name	Personal Statement Policy
Existing/Revised/New policy	New
What is the policy trying to achieve	This policy sets how the Commission approaches Sections 23 and 24 of the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023 (the Act) which require the Chief Commissioner to provide opportunities for eligible persons to make a personal statement, defines who is eligible to make such a statement, for that statement to be supplemented, and for the statement to be published if the person wishes it to be published. The policy provides a pathway through the personal statement process, setting out the nature and shape of participation rights
Policy author	The Information Recovery Programme Team, under the direction of the Commissioner for Investigations.
Policy owner	Commissioner for Investigations.

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

While people with disabilities, older people with life-limiting conditions, those from different religious traditions, or with particular political opinions, or women may particularly benefit from this policy in that they are more likely to have suffered a bereavement or serious injury as a result of the Troubles, it is designed to ensure equal access for all individuals across the Section 75 categories.

Implementation factors

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

The policy sets out the parameters for the Commission in terms of identifying those who may be eligible to make a personal statement. Where insufficient steps are taken to identify eligible persons, this could mean that they are not afforded relevant participation rights, and (depending on timing), impeded from making their own request to the Commission.

The statement can be recorded (in writing or by audio) by the Information Recovery Team; where this team is under resource pressure, there may be a challenge in offering this service. This is likely to be one of the pivotal moments with the course of an individuals' engagement with the Commission and it is important that it is undertaken in a way that is sensitive to the trauma experienced. Therefore, an individual should not feel this process is hurried and perfunctory.

A lack of understanding as to the purpose and parameters of the personal statement by those eligible to make a statement may prevent the Chief Commissioner from publishing the statements.

Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

Staff: Case Support Workers working with families; Information Recovery Team; Findings Officers	Actual
People who use our service: those bereaved and seriously injured in the Troubles / Conflict who have made a request for an investigation with the Commission; those bereaved and seriously injured in the Troubles / Conflict whose family member have made a request for an investigation with the Commission.	Actual
Other public sector organisations	Potential
Voluntary/community/trade unions: victim support services, proxy organisations	Potential
Other, please specify	n/a

Other policies with a bearing on this policy

Name	Who Owns
Mental Capacity Policy	Commissioner for Investigations
Safeguarding Policy	Head of Safeguarding
Safeguarding under 18s policy	Head of Safeguarding
Informed Principles – family relationships	Commissioner for Investigations
Handling a request policy	Commissioner for Investigations
Offsite meetings policy	Commissioner for Investigations
Data Protection policy	Director of Finance and Corporate Services

Available evidence

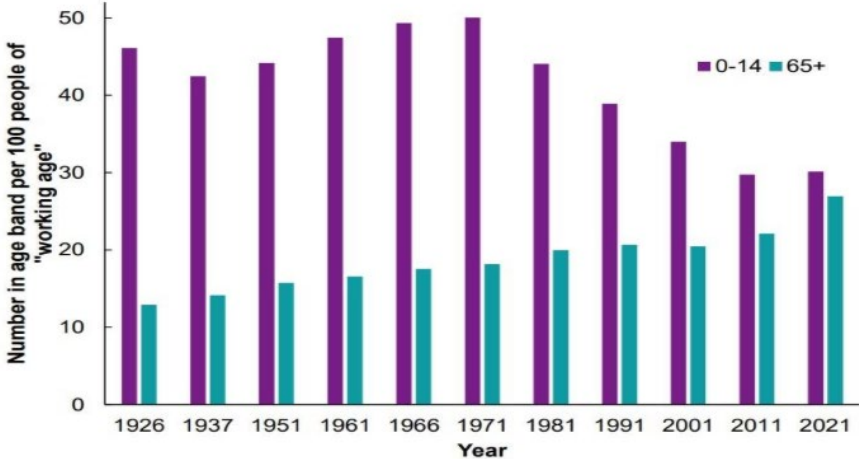
What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories.

Please note policy written before any staff employed so no internal information available.

Religious Belief	On Census Day 2021 just under one person in five (19.0%) either had 'no religion' (17.4%) or 'religion not stated' (1.6%). The equivalent percentages for the main religions were: • Catholic (42.3%) • Presbyterian Church in Ireland (16.6%) • Church of Ireland (11.5%) • Methodist (2.4%) • Other Christian denominations (6.9%) • Other non-Christian Religions (1.3%) Source: Census 2021 main statistics for settlements and wards in Northern Ireland Northern Ireland Statistics and Research Agency (nisra.gov.uk) The CAIN: Sutton Index of Deaths (ulster.ac.uk) shows the following breakdown of deaths by main religion in Northern Ireland: • Catholic:1522
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	• Protestant: 1288 • Not from Northern Ireland killed in Northern Ireland: 722
Political Opinion	While religious belief is not an automatic determinant of political opinion, it can, for the purposes of this screening, be used as a proxy to determine political opinion. The most recent census data of 2021 did collect information on the basis of identity as follows: In 2021, 31.86% of “All Usual Residents” declared their national identity as British Only; 29.13% selected Irish Only; and 19.78% stated Northern Irish Only. Since 2011, those declaring themselves as British Only and Northern Irish Only has declined by approximately 8 percentage points and 2 percentage points respectively in their share of the national identity categories. Source: Census 2021 main statistics for settlements and wards in Northern Ireland Northern Ireland Statistics and Research Agency (nisra.gov.uk) (Table MS-B15) The CAIN: Sutton Index of Deaths (ulster.ac.uk) shows a summary of the status of the person killed during the Troubles/ Conflict: Civilian, 1840 British Security, 1114 Republican Paramilitary, 397 Loyalist Paramilitary, 170 Irish Security, 11
Racial Group	Around 98% of Northern Ireland’s population identifies as white, with 2% belonging to minority ethnic groups (e.g., Black, Asian, Mixed). The 2021 Census data also revealed growth in the minority ethnic population. Within the time period in which the deaths and serious harm which the ICRIR can investigate occurred, the percentage of the population which identifies as white was even higher.
Age	The Northern Ireland Troubles (Legacy and Reconciliation) Act 2023 sets out that “the Troubles” means the events and conduct that related to Northern Ireland affairs and occurred during the period— (a)beginning with 1 January 1966, and

	(b)ending with 10 April 1998. The Commission recognises therefore that many people who are eligible to make a request for an investigation are likely to be relatively old. Further to this, individuals who themselves suffered serious harm as a result of a Troubles/ Conflict related incident, and who are therefore eligible to make a personal statement, are likely to be older due to these incidents occurring during the period 1966-1998.
Marital Status	The most recent Northern Ireland Census shows a declining trend in marriage rates, with more people opting for civil partnerships or remaining single. Northern Ireland Census 2021 data shows a decline in marriage rates, with 42% of adults married, 11% divorced, and an increasing number of people opting for civil partnerships or remaining single.
Sexual Orientation	Sexual orientation data indicates around 2% of the population identifies as LGB (Lesbian, Gay, Bisexual) based on NISRA's Continuous Household Survey.
Men and Women Generally	The Northern Ireland Census 2021 produced the following demographic breakdown for Northern Ireland: • Female 50.81% • Male 49.19% Census 2021 main statistics demography tables – age and sex
Disability	According to the NISRA, around 21% of Northern Ireland's population lives with a disability. This percentage increases with age. Requesting Individuals who have themselves suffered serious harm as a result of a serious injury related to the Troubles / Conflict will be more likely than the general public to be living with a disability.
Dependants	

	 Source: Census 2021 population and household estimates for Northern Ireland: Statistical bulletin (nisra.gov.uk) Census 2021 shows that there were 365,200 children (aged 0 to 14) or 19% of the population. While the population grows, household sizes continue to fall - the average household size has fallen from 2.54 in 2011 to 2.44 in 2021.
Gender Reassignment (required under Equality Act 2010):	Data on individuals who have undergone or are undergoing gender reassignment is scarce due to privacy concerns. However, estimates suggest that around 1% of the UK population identifies as transgender or non-binary. (Not required for section 75 but is required under the Equality Act)

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?

Specify details of the needs, experiences and priorities for each of the Section 75 categories below:

Religious belief	In light of the evidence above, the Commission may receive more requests for investigations from people with Catholic beliefs, and therefore more people with this religious belief may be eligible to make a personal statement. Religious belief is not considered by the Commission in terms of accessing the personal statement process – only the relationship to the deceased or seriously injured person. The policy ensures there is opportunity and participation for all religious groups, promoting fairness and equity of access. Further, the parameters of the personal statement, as set out in statute and developed in this policy, prevent the contents of the statement including anything which may be considered contrary to the public interest (such as derogatory statements about religious belief).
Political Opinion	The data suggests that political opinion may be a determinant in which cases are brought to the Commission. While there is not necessarily a link between the political opinion of the deceased / seriously injured and the political opinion of their family members who are eligible to make a personal statement, it could be reasonably assumed that there may be such a link. Political opinion does not determine whether to accept an investigation, any aspect of investigative activity, or the right to participate in the personal statement process (the latter is determined by family relationship). The policy ensures there is opportunity and participation for all political opinions, promoting fairness and equity of access. Further, the parameters of the personal statement, as set out in statute and developed in this policy, prevent the contents of the statement including anything which may be considered contrary to the public interest (such as derogatory statements about political opinion).
Racial Group	The policy remains neutral regarding racial groups, ensuring fair treatment.
Age	The Commission recognises that older people are more likely to request investigations and therefore more likely to be eligible to make a personal statement. However, there is no requirement for the eligible person to have met the deceased / seriously injured, so the personal statement process is therefore open to all regardless of age. The Commission has placed some guidelines around the appropriateness of children under the age of 18 in participating in the process. In addition, the Commission's emotional support offer may be useful for some in this category and flexibility will be shown throughout the personal statement process to ensure fairness and equity of access for older people (for example, enabling statements to be provided orally). The policy ensures there is opportunity and participation for people of all ages (allowing for the Commission's under 18 safeguarding policy)

	promoting fairness and equity of access. Provisions and mitigations from other policies such as the Commission's Charter of Commitments may be made for older individuals, particularly with respect to disability or life limiting conditions. These provisions include an opportunity to make a personal statement at a point which best suits the needs of the eligible person. Further, the parameters of the personal statement, as set out in statute and developed in this policy, prevent the contents of the statement including anything which may be considered contrary to the public interest (such as derogatory statements about older or younger people).
Marital status	No impact identified as the policy applies equally to all individuals regardless of marital status
Sexual orientation	No impact identified as the policy applies equally to all individuals regardless of sexual orientation.
Men and Women generally	The Commission acknowledges that women are more likely to have lost family members during the Troubles/Conflict than men and are therefore more likely to be eligible to make a personal statement. Emotional support services will be made available to all Requesting Individuals to ensure their needs are met through the personal statement process. Gender is not a consideration in terms of accessing the personal statement process – solely the family relationships to the deceased or seriously injured. Further, the parameters of the personal statement, as set out in statute and developed in this policy, prevent the contents of the statement including anything which may be considered contrary to the public interest (such as derogatory statements about gender).
Disability	The eligibility criteria in the Act on what constitutes serious harm makes it inevitable that the Commission will engage with people who have a severe level of disability. The Commission has a range of policies in processes in place to meet individual need, based around the support provided by the Case Support Team; in the case of the personal statement policy, the Information Recovery Team also play a role in taking the personal statement. The Commission will provide mental health accommodations, including access to trauma-informed emotional support services and flexibility in the timeline for personal statements, to ensure that individuals with mental health conditions or other needs arising from disability are fully supported throughout the process. Further, the parameters of the personal statement, as set out in statute and developed in this policy, prevent the contents of the statement

	including anything which may be considered contrary to the public interest (such as derogatory statements about disability).
Dependants	No impact identified as the policy applies equally to all individuals.

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?**

Details of the likely policy impacts on **Religious Belief**:

Assessment: The policy will have a minor impact on equality of opportunity for people approaching the Commission who hold different religious opinions.

Rationale: People who approach the Commission are more likely than not to hold one of the two major religious beliefs prevalent in Northern Ireland. Further to this, the sectarian nature of the Troubles/ Conflict means that any personal statement made by a family member of someone who is deceased, or suffered serious harm, may be influenced by the religious beliefs they hold.

Mitigations: The policy ensures there is opportunity and participation for all religious groups, promoting fairness and equity of access. Further, the parameters of the personal statement, as set out in statute and developed in this policy, prevent the contents of the statement including anything which may be considered contrary to the public interest (such as derogatory statements about religious belief).

Level of Impact	Major	Minor	None
		x	

Details of the likely policy impacts on **Political Opinion**:

Assessment: The policy will have a minor impact on equality of opportunity for people approaching the Commission who hold different political opinions.

Rationale: Due to the correlation between political opinion and religious beliefs in Northern Ireland, people who approach the Commission are more likely than not to hold political opinions which correspond with the two major religious beliefs prevalent in Northern Ireland. Further to this, the sectarian nature of the Troubles/ Conflict means that any personal statement made by a family member of someone who is deceased, or suffered serious harm, may be influenced by the political opinions they hold.

Mitigations: The policy ensures there is opportunity and participation for people who hold particular political opinions, promoting fairness and equity of access. Further, the parameters of the personal statement, as set out in statute and developed in this policy, prevent the contents of the statement including anything which may be considered contrary to the public interest (such as derogatory statements about political opinion).

Level of Impact	Major	Minor	None
		x	

Details of the likely policy impacts on **Racial Groups**:

Level of Impact	Major	Minor	None
			x

Details of the likely policy impacts on **age**:

Assessment: The policy will have a minor impact on the basis of the age of the person making the statement.

Rationale: The Commission recognises that older people are more likely to request investigations and therefore more likely to be eligible to make a personal statement.

Mitigations: The Commission will ensure appropriate accommodations are made to allow for older people to provide a personal statement where such a need arises, such as the option to provide a personal statement orally.

Level of Impact	Major	Minor	None
		x	

Details of the likely policy impacts on **Marital Status**:

Level of Impact	Major	Minor	None
			x

Details of the likely policy impacts on **Sexual Orientation**:

Level of Impact	Major	Minor	None
			x

Details of the likely policy impacts on **Men and Women**:

Assessment: The policy will have a minor impact on the basis of the sex of the person making the statement.

Rationale: The Commission acknowledges that women are more likely to have lost family members during the Troubles/Conflict than men and are therefore more likely to be eligible to make a personal statement.

Mitigations: The Commission will ensure that emotional and logistical support services are made available to everyone who is entitled to make a personal statement as part of the Commission's investigative process.

Level of Impact	Major	Minor	None
		x	

Details of the likely policy impacts on **disability**:

Assessment: The policy will have a minor impact where a person making a personal statement is living with a disability.

Rationale: The Commission recognise the intersectionality of age and disability in Northern Ireland, as borne out by the evidence provided above. The Commission recognises that older people are more likely to request investigations, are more likely to be eligible to make a personal statement and are therefore more likely to be living with a disability.

Mitigations: The Commission will ensure that reasonable adjustments are made to allow people living with a disability to make a personal statement where such a need arises.

Level of Impact	Major	Minor	None
		x	

Details of the likely policy impacts on **Dependants**:

Level of Impact	Major	Minor	None
			x

2. **Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?** Yes. The personal statement process seeks to provide an opportunity for those impacted by specific events in the Troubles / Conflict to share their experiences publicly. It is likely that these experiences will reflect common themes, regardless of the background, or s75 equalities category the author of the statement may fall into. It is the development of common themes – shared experiences of the conflict – which will help promote a sense of equality of opportunity.

Detail opportunities of how this policy could promote equality of opportunity for people within each of the Section 75 Categories below:

Religious Belief - If Yes, provide details:

Political Opinion - If Yes, provide details:

Racial Group - If Yes, provide details:

Age - If Yes, provide details:

Marital Status - If Yes, provide details:

Sexual Orientation - If Yes, provide details:

Men and Women generally - If Yes, provide details:

Disability - If Yes, provide details:

Dependants - If Yes, provide details:

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

Please provide details of the likely policy impact and determine the level of impact for each of the categories below i.e. either minor, major or none.

Details of the likely policy impacts on **Religious belief**:

What is the level of impact? Minor.

Details of the likely policy impacts on **Political Opinion**:

What is the level of impact? Minor.

Details of the likely policy impacts on **Racial Group**:

What is the level of impact? None.

4. **Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?**

Detail opportunities of how this policy could better promote good relations for people within each of the Section 75 Categories below:

The Commission is embedding a trauma and resilience informed model (TRIM) across its people, processes, external engagement and places. It is anticipated that this approach along with other policies, including the Charter for Victims, aim to promote participation and inclusivity will help to better promote good relations for people with the S75 equality groups.

Further, the policy itself functions as a mechanism for Commission's commitment to the promotion of the objective of reconciliation by providing opportunity and empowering those injured and bereaved by the Troubles/Conflict to talk about the past in a resilient way.

Additional considerations

Multiple identity

It is recognised that this policy may impact on people with multiple identities. The Commission acknowledges that individuals with multiple identities may experience unique impacts. We will ensure that these are fully considered, and accommodations are made where necessary.

The Commission recognises the diverse needs of individuals with disabilities, older people, those from different religious and community backgrounds, those with differing political opinions and women who are statistically more likely to have been bereaved during the Troubles/Conflict and are more likely to ask for an investigation and therefore been eligible to make a personal statement. The Commission also acknowledges that individuals with intersecting identities, such as elderly women with disabilities, may face compounded barriers. The Commission is committed to providing reasonable accommodations to ensure their full participation in the personal statement process and that any issues they raise are fully considered in the decisions taken by the Commission. This is consistent with the Commission's values in relation to impartiality and openness.

This is also an optional process and there is choice provided for those who are offered the opportunity to provide a personal statement – this is not a mandatory aspect of engaging with the Commission and respect, choice and opportunity are provided to all who may or may not wish to make a personal statement. The TRIM approach enables the Commission to take a tailored approach to each individual with whom it works and provides particular flexibility to accommodate the needs of those with multiple identities.

Part 3. Screening decision

Screening Outcome: Screened out

Decision: The decision is not to conduct an equality impact assessment on the personal statement policy.

Mitigation

The policy provides equitable access to the personal statement process with sufficient flexibility to meet the needs of those who may require additional support during the process.

Overall, while the policy may not directly address each of the nine listed categories under S75 of the Northern Ireland Act 1998, its principles and procedures contribute to creating an environment where equal opportunity and good relations are upheld and respected.

Approval and authorisation

Screened by: Operational Policy Assurance and Compliance

Date: 19 September 2024

Screened by: Operational Policy Assurance and Compliance

Date: 7 April 2026

Approved by: Commissioner for Investigations

Date: 1 May 2026