



Independent Commission for Reconciliation and Information Recovery

Annual Report and Accounts 2024-25
For the period 1 April 2024 to 31 March 2025

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Presented to Parliament pursuant to para 6(4) of Schedule 1 to the
Northern Ireland Troubles (Legacy and Reconciliation) Act 2023

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Foreword by Chief Commissioner

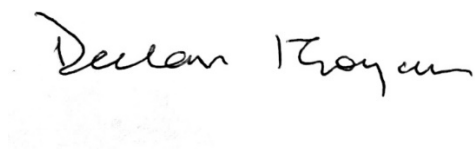
The following report details the work undertaken by the Independent Commission for Reconciliation and Information Recovery in the period spanning 01 April 2024 to 31 March 2025.

This period marked the first opportunity that victims, survivors and families have had to approach the Commission. For some, this is the first time that they will have engaged with such a body. Others may have engaged with previous mechanisms but have questions that remain unanswered. As we look to the future, our focus remains on ensuring that we deliver, to the best of our abilities, for those who place their trust in the Commission. We remain steadfast in our purpose to provide a meaningful and independent mechanism for victims, survivors and their families seeking answers about the past. To provide them with the unvarnished truth.

Over the reporting period, 159 cases were registered, and 50 investigations opened. This number has continued to increase. More than 200 people have so far approached the Commission, and we now have more than 90 live investigations. As these investigations move through to the final stages, work is underway to prepare the Commission's first reports for publication.

In this complex and often contested environment, the Commission has sought to carry out its work with integrity, sensitivity, and independence. The High Court and the Court of Appeal in Northern Ireland have found that we are capable of doing this in an Article 2-compliant way in most, if not all, cases.

We also recognise the essential need to build and sustain trust through transparency, engagement, and sensitivity to the diverse experiences and perspectives across society. We are acutely aware that public confidence in the Commission's work is not a given, it must be earned. This means listening to and engaging with all communities across Northern Ireland and beyond.



Sir Declan Morgan

Chief Commissioner

Chief Executive Officer's introduction

Following an intensive period of work to establish the Commission, the 2024-25 year comprised significant efforts to facilitate the commencement of the Commission's operations on 1 May 2024. This was a task that the Commission embarked upon in parallel with increasing efforts to build public understanding and obtain certainty regarding the framework of the Commission's work adhering to the European Convention on Human Rights (ECHR).

The achievements of my colleagues within the Commission throughout this period have been extensive, with nearly every milestone detailed in our 2024-25 Work plan having been met. The hard work of our dedicated and conscientious team enabled the Commission to begin accepting enquiries from victims, survivors and families on 1 May. Since then, the number of Requesting Individuals has continued to grow with cases moving through the Commission's investigative process.

Fundamental to the solid underpinning of this organisation is our demonstrable commitment to our values of integrity, openness, respect, impartiality and accountability. It is in this spirit, that in instances where there are lessons to be learned, we have sought to act with transparency and commit to learning and refinement. Areas that have been identified for improvement are detailed throughout the performance and accountability sections of this annual report. Most notable are the recent data breach incidents that have been made a matter of public record. Our commitment to ensuring that our information handling and information management procedures are robust and built on the strictest standards will continue to be of central importance for 2025-26.

We are fully committed to the reform and strengthening of the Commission to enable us to deliver truth and justice for victims, survivors and families. In all areas of our delivery, we continue to be guided by our principal statutory objective, the promotion of reconciliation. To this end, our core priority remains the delivery of outcomes for those people who come to the Commission to seek answers.



Louise Warde Hunter

Chief Executive Officer and Commissioner

Performance report

Performance overview

Our purpose

The Independent Commission for Reconciliation and Information Recovery (ICRIR) (the Commission) is an independent non-departmental public body. The Commission was established under the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023 (the Act).

The Commission was established to provide answers for those impacted by deaths and serious injuries related to the Troubles/Conflict. The Act enables the Commission to carry out investigations into deaths and other harmful conduct that formed part of the Troubles/Conflict, and produce a report on the findings of each investigation. The Commission also has powers to refer deaths and other harmful conduct to prosecutors and is required to produce a record of deaths that were caused by conduct forming part of the Troubles/Conflict.

The Act confines the scope of the Commission's remit to events and conduct that related to Northern Ireland affairs and occurred during the period beginning 1 January 1966 and ending with 10 April 1998.

Since it was established in December 2023, the Commission has embraced an approach that places victims, survivors and families at the centre of our work, ensuring that their needs are recognised and understood.

Our commitment to three core principles is embedded at all levels of the organisation:

- Compliance with the European Convention on Human Rights (ECHR): ensuring that all investigations and operations adhere to the standards set by the ECHR. This includes those that pre-date 1990.
- Respect for the principles of the 1998 Belfast/Good Friday Agreement: upholding the agreements and understandings established in this crucial document.
- Focus on providing useful information to those affected by the Troubles/Conflict: prioritising delivering meaningful and relevant information to victims, survivors, and their families.

The Commission became operational on 1 May 2024, and began its work with integrity, care, and dedication to seeking the unvarnished truth. This is what victims, survivors, and families rightly expect and deserve.

Our vision and mission

Vision

A society that is more reconciled because the Commission has provided greater information to the public about deaths and serious injuries during the Troubles/Conflict.

Mission

An independent Commission committed to serving victims, families, and survivors by thoroughly investigating and establishing the facts of past events, to provide an acknowledgement of the wrongdoing, in a way that is sensitive to the trauma experienced and assists with the promotion of reconciliation.

Our values

The Commission's Code of Conduct was published in December 2023 and sets out the values the Commission has adopted to guide its work—integrity, impartiality, openness, accountability, and respect. They are the standards of behaviour that can be expected of Commissioners, officers, and others working on behalf of the Commission. These values, and how they should be interpreted by those that the Code of Conduct applies to, are outlined below.

Integrity

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

Openness

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

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.

Impartiality

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

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.

Our structure

The Commission is governed by statutory provisions to ensure accountability and independence.

Our Board of Commissioners is our primary governing body, chaired by the Chief Commissioner, Sir Declan Morgan. The Board has collective responsibility for setting the strategic direction of the Commission to enable it to deliver its statutory functions. The Board is supported by its sub-committees, the Remuneration and Nomination Committee, Investigative Oversight Committee, and Audit and Risk Committee.

The Commission's Executive Leadership Team (ELT) provides strategic advice to the Board and is responsible for delivering the Commission's vision by overseeing the organisation's overall performance and delivery. Further details of our governance structure can be found in our governance statement on page 33.

Our operational delivery is undertaken by our Investigations and Findings functions. This work is enabled by colleagues comprising our corporate operations, human resources, Commission secretariat, General Counsel and strategic communications teams.

As the Commission's work progresses, we are focused on strengthening our ability to deliver. We are committed to continuous improvement by enhancing our processes and governance.

As detailed in our 2025-26 work plan, our organisational culture is centred on demonstrating our competence and care in our delivery for victims, survivors, and families. This will require us to be responsive and adaptable in a changing environment.

Our investigations

There are three types of investigation that the Commission may carry out: focused, culpability and liability. More information about each type of investigation is available on the Commission's website.¹ The Commissioner for Investigations, informed by the

¹ <https://icrir.independent-inquiry.uk/our-investigations/>

Information Recovery Team, will decide which type of investigation is most appropriate for each case.

Three stages of an investigation

Stage one: Support

This is the start of an individual's journey with the Commission.

Dedicated Case Support Workers will help individuals and families better understand how the Commission may be able to help them (and what it will not be able to do), the different options available to them, and the information the Commission will need to move to the next stage.

While this is the first stage of the journey, that support will be available throughout the entire process. The Case Support team will provide a single point of contact and consistent, objective support for the Requesting Individual and family throughout their time with the Commission.

The team will respond to any questions and provide people with the space, time and information to make decisions that are right for them and the information recovery outcomes they seek.

Stage two: Information Recovery

In this next stage, a team of investigators will gather information and evidence and seek to answer the questions the Requesting Individual and family have raised.

The team will need a range of skill sets, to comb through archives, interview witnesses, and secure evidence. Investigators will work across a range of different cases at any one time to maximise progress and efficiency.

Each investigation will be overseen by a Senior Investigative Officer. Investigators will be able to require access to all material from any previous fact-finding and determination processes, as well as all material held by the state, no matter how sensitive.

They may also undertake new investigative work. The Investigations team will follow defined terms of reference for each investigation, which will start with a scoping exercise, based on an approach to cold case reviews that follows internationally recognised best practice. This will inform the Commissioner for Investigations' decision on which of the three investigative routes will be most appropriate for the case.

All three routes will embed the features required for an ECHR compliant investigation.

Stage three: Findings

The Chief Commissioner is responsible for the production of reports at the conclusion of investigations. In this work, they are supported by the Findings team. A Findings Officer from the unit is assigned to each investigation from an early stage and will independently challenge the direction of investigative work. As the investigation nears its conclusion, the Commissioner for Investigations and his team will present their evidence to the Chief Commissioner who will assess and evaluate it to determine findings.

Further investigative work may be requested. Reports will be produced to record the findings that have been made and to seek to address the Requesting Individual's questions.

The Chief Commissioner will provide the opportunity for an eligible person to make a personal statement to be published alongside the final report. Personal statements can be made by individuals to share how Troubles/Conflict-related events have affected, and continue to affect them or any other relevant persons.

Strategic objectives 2024–25

The Board of Commissioners agreed four strategic objectives for 2024–25:

1. Improving wider public understanding of what the Commission can do and building credibility and trust with the wider public.
2. Obtaining certainty about the framework for the Commission's work adhering to the ECHR (and obtaining changes if needed to meet this principle).
3. Beginning operations (case support, information recovery, findings) and improving them through learning and feedback, and using this work to demonstrate the validity and efficacy of this new approach.
4. Undertaking preliminary policy development and cross community engagement as a foundation for the Commission's historical record function and wider reconciliation work.

Our strategic objectives are underpinned by our principal statutory objective: to promote reconciliation. The progress we have made across our strategic objectives is reported in detail in the performance analysis section.

2024–25 Review

The Commission developed at pace during 2024–25, building on the strong foundations established in the previous year. The Commission's annual work plan 2024–25 included a set of milestones, with progress against these reported in the table on page 13. This was the first work plan for the Commission. It contained a

broad range of work aimed at ensuring the Commission operates effectively as an independent organisation rooted in our values.

Work throughout the period also focused on the mitigation of the most significant strategic risks faced by the Commission, including the uncertain legislative context impacting on the Commission's ability to build public confidence, ensuring appropriate budgetary provision within a tight fiscal environment, and the requirement to ensure appropriate resource across the organisation to meet demand from Requesting Individuals for investigations.

Throughout the reporting period, a comprehensive programme of communications and engagement has continued with a broad range of stakeholders, in addition to victims, families and survivors. Our approach utilised insight gathered from public surveys and focus groups which assessed levels of awareness and enabled us to understand public opinions.

In line with our commitment to openness, the Commission published regular updates on our public-facing website. We also undertook two briefings of the Northern Ireland Assembly Committee for the Executive Office and provided written evidence to the House of Commons Northern Ireland Affairs Committee as part of its inquiry into "The Government's new approach to addressing the legacy of the past in Northern Ireland."

Four public consultations were completed, with the responses received used to iterate our frameworks, policies and strategies.

The Commission continued to engage with international stakeholders including the UN Human Rights Office and the Council of Europe, to explore best practice in relation to compliance with the provisions of the European Convention on Human Rights (ECHR).

From 1 May 2024, Requesting Individuals were able to begin their journey with the Commission, through the three stages of investigations (Support, Information Recovery, and Findings). Whilst the volume has fluctuated during the year, the Commission is now receiving a steady level of requests.

By 31 March 2025, a total of 153 Requesting Individuals had approached the Commission, 159 cases had been registered, and 50 investigations had been opened. Work is ongoing to prepare the Commission's first Findings reports for publication.

Strong operational processes have been developed and initiated to support our investigative work. These include introduction of the Operational Design Framework and the Trauma and Resiliency Informed Model (TRIM), Information Disclosure Protocols, and independent oversight arrangements for the use of police powers.

The operational capability of the Commission also increased significantly during 2024–25. 169 members of staff were employed by 31 March 2025 across the Belfast and London sites. Operational sites in London and Northern Ireland were established and the headquarters in central Belfast opened to the public.

Due to the projected growth in the number of Requesting Individuals approaching the Commission and resulting investigations, the number of investigative staff and office accommodation required will increase further during 2025–26.

The Commission has sought to create organisational conditions for encouraging the promotion of reconciliation in the exercise of its functions. Alongside this, exploratory work continued during 2024–25 around the requirement to prepare and publish the historical record on the Troubles/Conflict.

In light of the recent announcement of the joint framework² on the legacy of the Troubles/Conflict between the British and Irish governments, the Commission will work to enable a seamless transition for our Requesting Individuals into a reformed Commission. There will be no pause in our vital work.

² [157535 NIO Joint Framework Online Single Pages.pdf](#)

Progress against milestones in annual work plan 2024–25

The table below outlines the progress achieved against the milestones set out in our annual work plan 2024–25.

Milestone	Update
Completion of TRIM consultation and development of TRIM definitions.	The consultation on Implementing a Trauma Informed Approach completed on 11 April 2024, with the response published on 9 October 2024. Feedback received was used to develop the Framework for Implementing the Trauma and Resiliency Informed Model (TRIM), published on 22 October 2024.
Publication of information on how to make a request to the Commission.	A suite of documents was published on the ICRIR website on 27 April 2024. This included: • A leaflet explaining what we do and how to contact the Commission • Fact sheets about the investigative process and what to expect when you contact the Commission • An Easy Read guide to the Commission services and how to access them Additional documents have since been added including the Commission's policy on handling requests for investigations.
ICRIR becomes operational.	The ICRIR became operational on 1 May 2024.
Completion of Disability Action Plan consultation and publication of responses.	The consultation on the Disability Action Plan completed on 7 May 2024. The consultation response and the finalised Disability Action Plan were published on 5 July 2024.
Completion of Equality Scheme consultation.	The consultation on the Equality Scheme completed on 30 May 2024. The scheme was submitted to the Equality Commission for Northern Ireland (ECNI) in June 2024 for review and was approved in May 2025.

Milestone	Update
Completion of phase 1 recruitment and start of phase 2.	Phase 1 recruitment completed in September 2024 and successful candidates continue to be onboarded. Phase 2 recruitment commenced in September 2024.
Meeting of External Advisory Group (EAG) to provide independent view of operating policies.	The EAG was established in February 2024 and had its inaugural meeting in May 2024. The EAG comprises nine members who are based in Northern Ireland, Great Britain, and the USA, and are drawn from a range of relevant backgrounds and expertise.
Completion of audit of groups representing disabled peoples' interests.	Groups representing disabled peoples' interests have been included in our Section 75 consultee list.
Start of audit of inequalities.	The ICRIR Equality Scheme has been approved by the Equality Commission for Northern Ireland. An audit of inequalities will subsequently commence, to identify inequalities that exist for those who interact with the Commission and those affected by our policies. An action plan will then be developed following the completion of the audit.
Appointment of new CEO.	Our CEO, Louise Warde Hunter, took up post in August 2024.
Publication of Annual Report and Accounts.	The Annual Report and Accounts for 2023–24 were published on 12 December 2024.
Start preparatory work for three-year business plan and funding requirements.	The development of the three-year business plan has been paused until more certainty can be achieved regarding the legislative context that the Commission will be operating in.
Completion of handover of operating policies and processes from programme establishment team.	The programme to establish the Commission was formally concluded on 30 September 2024, with the final meeting of the Programme Board taking place on that date.
Progression of phase 2 recruitment.	Phase 2 recruitment completed in March 2025 and successful candidates continue to be onboarded.

Milestone	Update
Improvement of Board reporting metrics.	Performance staff joined the Commission in late 2024 and have been working on establishing a performance framework and reporting metrics for 2025–26.
Completion of programme establishment team work and lessons learned.	Following the conclusion of the Establishment Programme in September 2024, all activities were subsequently mainstreamed into business-as-usual Commission delivery. Reports on each of the workstreams were produced for ELT and several programme team members remained in post working on outstanding activities until 31 October 2024.
Development of three-year business plan.	The development of the three-year business plan has been paused until more certainty emerges regarding the future legislative context affecting the Commission.
Publication of 2025–26 annual work plan.	The 2025–26 annual work plan was published on 7 January 2025.

Performance analysis

The performance analysis describes in more detail what we have delivered over the financial year 2024-25, and our performance against our strategic objectives, including the challenges we have faced and an overview of developments for the coming year. Work throughout the period also focused on the mitigation of the most significant strategic risks faced by the Commission (outlined on page 11). Further detail, including how the Commission has developed risk management processes, is contained within the accountability report.

Strategic objective 1: Improving wider public understanding of what the Commission can do and building credibility and trust with the wider public.

Throughout 2024–25, the Commission sought to increase awareness of our work through a comprehensive programme of engagement and communications activity.

Engagement and consultation

In July 2024, we published the results from focus groups and baseline polling surveys. The independent research was conducted between November 2023 and March 2024. It aimed to establish the level of public awareness and understanding of the Commission's functions and capture opinions on the Commission's proposed work.

The results provided insight into levels of awareness and understanding of the Commission, and how this changed over time. For example, the results demonstrated an increase in public awareness of the Commission and found that sharing information with families, regarding their cases, and the public, about the work of the Commission, would assist it in achieving its overall aims and aid the promotion of reconciliation.

During 2024–25, the Commission conducted and completed four public consultations. These included the Commission's operational design, the implementation of a trauma-informed approach, the Disability Action Plan, and the Equality Scheme. The responses and suggestions received supported the development of Commission frameworks, policies and strategies.

This activity sought to inform and connect with victims, survivors, families, and stakeholders, and ensure the Commission's services are transparent and well-understood. This approach to listening and engagement will continue into the next year. Through consultation and collation of feedback we will continue to assess perceptions of the Commission in Northern Ireland and Great Britain, and how we can work to improve our operational delivery, based on the experience of our Requesting Individuals.

Throughout 2024–25 we met with a range of stakeholders including victims and survivors, representative groups, community groups, elected representatives and statutory bodies. The Commission disseminated stakeholder newsletters, including updates on key areas of work and relevant developments. We also sought to raise awareness of the Commission through print, digital and broadcast media activity.

The Commission presented evidence to the Committee for the Executive Office on its work in both September 2024 and February 2025.

Case study: TRIM webinar

A webinar ‘Supporting victims, survivors and families—the Commission’s Trauma and Resiliency Informed Model (TRIM)’ took place on 9 October 2024, with contributions from internal speakers and external experts. It was attended by 37 external participants and received positive feedback.

Recordings of our TRIM webinar can be accessed on our website here: [The ICRIIR outlines trauma based approach - Independent Commission for Reconciliation & Information Recovery](#)

Publications

Ahead of the Commission’s operational launch on 1 May 2024 we developed and published documents explaining the Commission’s role, services and how to request an investigation.

Towards the end of the reporting period, further online and hard copy materials were produced. A pack was developed for Requesting Individuals providing 15 leaflets of additional guidance on the Commission’s process and the support available. An accessible Easy Read guide was also created, entitled ‘What we can do for you’.

In line with our commitment to openness, the Commission published information on operations at regular intervals. The Commission published two Accountability Updates over the course of the reporting period. The first covered the period 1 May 2024–31 August 2024 and the second from 1 September 2024–31 March 2025. These updates detailed the number of Requesting Individuals, the number of investigations, and associated developments in organisational capability, engagement and independence.

Looking ahead

Working to build trust within a complex operating environment will remain a key priority for the Commission. The Commission will continue to refine our approach to outreach based on the data, insights and feedback we have obtained over the course of 2024–25.

The Commission is committed to ongoing dialogue with all stakeholders. Listening and responding will remain a central element of our approach to outreach. This will include ongoing communication with stakeholders regarding how the joint framework between the British and Irish governments, and the associated legislation, will impact upon the Commission's activities. We will also ensure that our approach to engagement with current and potential Requesting Individuals provides clear and accessible information on how the changes, and new powers in particular, could impact upon our investigative activity.

Strategic objective 2: Obtaining certainty about the framework for the Commission's work adhering to the ECHR (and obtaining changes if needed to meet this principle).

Compliance with Articles 2 and 3 of the European Convention on Human Rights (ECHR) is one of the three essential principles that apply to the work of the Commission. During 2024–25, the Commission continued to engage with stakeholders including the UN Human Rights Office and the Council of Europe to explore how it can best comply with the ECHR provisions.

In March 2024, the proposed operational design for the Commission was published for an eight-week consultation. The responses and suggestions received from the public and stakeholders were used to develop the Operational Design Framework, which was officially launched in July 2024.

Some of the adaptations made to the operational design following the consultation included the creation of two Charter of Commitments documents which outline what a victim, survivor, family member or witness can expect from their journey with the Commission; allowing individuals engaging with the Commission to be accompanied by a chosen representative; and increased flexibility around changing the nature of a request if new information comes to light during an investigative process.

The importance of supporting individuals throughout the process and explaining how the principles of ECHR compliant investigations will be applied, was also reinforced.

The Chief Commissioner presented the Operational Design Framework to officials at the UN Office of the High Commissioner for Human Rights in July 2024, as part of a continuing dialogue to receive input from experts in the field.

Looking ahead

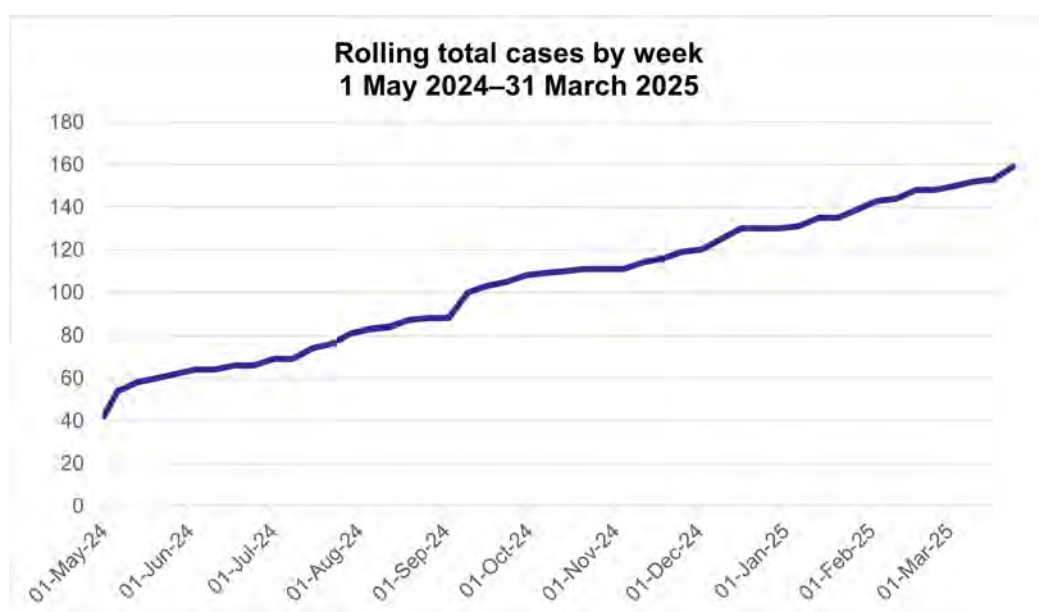
The Commission has welcomed the UK Government's proposals to reform and strengthen our independence, to aid our work to find the unvarnished truth for victims, survivors and their families, which they have sought for decades. Reform and strengthening will also, in our view, increase confidence among victims, survivors, families and the wider community to approach the Commission. To this

end, in February 2025 the Commission provided written evidence to the Northern Ireland Affairs Committee as part of its inquiry into 'The Government's new approach to addressing the legacy of the past in Northern Ireland.' This included an overview of the Commission's work, in addition to indicative considerations on how the UK Government might reform the Commission to enhance its established independence.

The Commission has also welcomed the clarity provided by the recent announcement between the British and Irish governments regarding the joint framework on the legacy of the Troubles/Conflict. We will work to ensure that we are ready to implement the changes necessitated by the framework and the forthcoming legislation.

Strategic objective 3: Beginning operations (case support, information recovery, findings) and improving them through learning and feedback, and using this work to demonstrate the validity and efficacy of this new approach.

From 1 May 2024, Requesting Individuals were able to begin their journey with the Commission through the three stages of investigations (Support, Information Recovery, and Findings). Within the Commission's first four months of operation (1 May to 31 August), 85 separate substantive enquiries from victims, survivors or families about whether the Commission can investigate their injury or the death of their loved one were received and registered. Monthly numbers have continued to grow and the Commission is now receiving a steady level of requests, averaging between eight and nine new cases per month.



We can accept Requesting Individuals affected by the Troubles/Conflict, from any jurisdiction. A number of Requesting Individuals have made more than one request.

Some individuals' requests have been withdrawn or closed, for example if an individual decided not to proceed. Nevertheless, numbers continue to grow.

In July 2024, the first investigations were opened, with the number of cases moving through to this second stage of the investigations process gradually increasing in the last six months. The average is now nine new investigations being opened per month.

As a result, by 31 March 2025, a total of 153 Requesting Individuals had approached the Commission, 159 cases had been registered, and 50 investigations had been opened. These 50 investigations relate to a global total of 97 deaths. Due to the absence of data for any prior periods, these numbers for 2024–25 are useful in establishing an initial baseline and will provide a comparator for future years.

Throughout the reporting period, work has been undertaken to consider the design of the Commission's first Findings reports. This has sought to ensure that they are comprehensive, clear, accessible, accurate and consistent, as well as seeking to answer the questions asked by Requesting Individuals.

Operational development

During 2024–25, strong processes were developed and put in place to enable the Commission to fulfil its statutory function to provide information to victims, survivors and their families about deaths and serious injuries related to the Troubles/Conflict.

As the Commission's operations developed, key policies and procedures were produced to guide employee conduct, ensure operational efficiency, and promote a positive workplace. These included developing key policies on handling requests for investigation, safeguarding information, implementing the Operational Design Framework, embedding the Trauma and Resiliency Informed Model (TRIM), agreeing Information Disclosure Protocols with relevant authorities, and agreeing independent oversight arrangements for the use of police powers by designated Commission officers.

a) Trauma and Resiliency Informed Model (TRIM)

Throughout 2024–25, the Commission developed its Trauma and Resiliency Informed Model (TRIM). The model acknowledges that those engaging with the Commission may experience stress or even re-traumatisation. In developing the TRIM, the Commission engaged and continues to collaborate with organisations experienced in this area such as the Commission for Victims and Survivors (CVS) and the Victims and Survivors Service (VSS), and with people with lived experience.

Key steps undertaken to embed the TRIM across the Commission included:

- Developing and implementing staff training to raise awareness of the impact of trauma, and the role of resiliency factors in reducing re-traumatisation. Case Support Workers and Investigators receive further bespoke training in trauma and resiliency to support their work with Requesting Individuals, families and witnesses.
- The establishment of an independent emotional support service for Requesting Individuals and witnesses.
- Implementing listening conversations for both individual staff members and groups of staff. Listening conversations assist in reducing stress, enhancing resiliency and self-care and cultivating learning and reflection which will inform the ongoing development and evolution of the Commission's TRIM.

b) Information Disclosure Protocols

In handling information, the Commission is subject to requirements set out in regulations made by the Secretary of State under Section 34 of the Legacy Act and other relevant legislation, as well as its own internal handling protocols, policies and procedures.

During 2024–25, the Commission engaged with relevant authorities to establish appropriate Information Disclosure Protocols (IDPs). The purpose of these protocols is to support the timely and full provision of all information that the Commissioner for Investigations reasonably requires for the purposes of, or in connection with, the exercise of the review function (including carrying out investigations). The protocols seek to achieve this by setting out the Commission's procedures for requesting, receiving and handling information, including onward disclosure of information.

c) Independent oversight

In April 2024, the Commission agreed arrangements with the Police Ombudsman of Northern Ireland (PONI) to provide independent oversight of the use of police powers by designated Commission officers in Northern Ireland. Parallel arrangements were agreed with the Police Investigations and Review Commissioners (PIRC) in February 2025 to provide independent oversight in Scotland, and with the Independent Office for Police Conduct (IOPC) in May 2025 to provide independent oversight in England and Wales.

d) External Advisory Group

The External Advisory Group (EAG) was formed in February 2024 and held its first meeting in May 2024. The group was established by the Board to advise the Commissioner for Investigations (and the wider Commission) on operating policies and practices including providing expert insight to assist the Commissioner for Investigations to discharge their duties. The EAG has an important role to play in providing expert advice and professional challenge to the Commission, with an

international membership of the highest calibre in law enforcement, criminal justice, and legal and trauma-informed practice.

e) Conflict of Interest policy

On 14 May 2024, the Commission published a document outlining our approach to handling possible conflicts of interest within investigations. In line with this policy, all staff involved in investigations, in a decision-making or supervisory capacity are required to complete a Conflict of Interest declaration. Where a conflict, actual, potential, or perceived, is identified, the individual must submit the declaration to their line manager and refrain from engaging in the case until a decision is made.

Operational capability

a) Human Resources

During 2024–25, the headcount and capability of the Commission increased significantly through the delivery of several recruitment campaigns.

At 31 March 2025, the Commission employed 169 members of staff, 60% of whom were based in Belfast and 40% were based in London. 56% of Commission staff were female and 44% were male. The workforce of ICRIR is made up of those directly employed by ICRIR, those on temporary loan or secondment from other organisations and agency and contracted workers supporting short term projects.

Case study: Recruitment in operations

At 31 March 2025, 43 staff worked in the Information Recovery (IR) team of the Investigations directorate. This includes Senior Investigating Officers, IR Team Supervisors, Investigating Officers and Investigation Support Officers.

Due to the projected growth in the number of Requesting Individuals approaching the Commission and the number of investigations being carried out, the number of Investigations staff will increase in 2025–26.

The wider operations work also includes Case Support and Findings. Of the 86 people working in operations, 45% have investigative experience in Northern Ireland. A further 36% have investigative experience solely outside of Northern Ireland. The remaining 19% of people have other relevant experience for the delivery of the Commission's work, such as Analysts.

A comprehensive induction programme is attended by operational staff who join the Commission's Case Support, Information Recovery and Findings teams. Investigators also undertake bespoke College of Policing baseline training that has been co-designed with the Commission.

During 2024–25, the pace of staff recruitment continued to be affected by the time taken to obtain security clearances. This has resulted in some successful candidates having to wait for an extended period before joining the Commission and has also led to some candidate attrition. Ongoing engagement with the relevant stakeholders was continually undertaken to attempt to minimise delays.

The Commission is committed, both organisationally and legally, to monitoring the composition of staff backgrounds and demographics. Our ability to represent the society that we serve is important.

When employing/seconding officers, the Commission is required by the Act to ensure, as far as it is reasonably practicable, that these individuals include: a) persons who have experience of conducting criminal investigations in Northern Ireland, and b) persons who do not have that experience but have experience of conducting criminal investigations outside Northern Ireland.

To support staff, a Learning and Development Strategy 2024–26 was launched in April 2024. Three of the four main areas of work have started—foundational learning, learner pathways and continuous professional development—with the fourth area of leadership and management currently being explored. An updated Learning and Development policy for the Commission was launched in April 2025.

b) Infrastructure

During 2024–25, operational sites in London and Northern Ireland were established and equipped, with appropriate IT and security capabilities installed. The Commission’s headquarters office in central Belfast is open to the public, with additional bespoke space available to host meetings with victims, survivors and families in a secure and sensitive environment. Due to the projected growth of the Commission’s investigative workload, additional operational accommodation will be required before the end of 2025–26.

Looking ahead

As increasing numbers of cases move through the Commission’s three-stage process, the work of learning from feedback and progressing continuous improvement will be developed. We will continue to monitor systems closely, adapting as necessary to meet evolving demand for our services, in addition to changes necessitated by new legislation. Assurance and compliance activities will be undertaken so the Commission can ensure that all relevant policies and procedures are being implemented correctly and consistently.

Strategic objective 4: Undertaking preliminary policy development and cross community engagement as a foundation for the Commission's historical record function and wider reconciliation work.

Historical record

Under the Legacy Act, the Commission is required to prepare and publish the historical record on the Troubles/Conflict. In 2024–25 the Commission started to develop its initial thinking on how to deliver this objective. Early exploratory work will continue into 2025–26.

Promotion of reconciliation

The Commission's principal objective in exercising its functions is to promote reconciliation. The Commission's aim is to try and create organisational conditions for procedurally encouraging the promotion of reconciliation in the exercise of its functions by:

- Building mutual respect and trust.
- Protection of fundamental rights.
- Rapprochement between cultural, political and national identities.
- Due regard to the need to promote equality of opportunity.
- Regard for the desirability of promoting good relations.
- Promoting a culture of tolerance at all levels and all aspects of society.
- Acknowledgement of the suffering of victims and survivors.
- Delivering justice, accountability and information about the past.
- Striving for the achievement of a peaceful and just society.

Consultation on the principal statutory objective, including the possibility of establishing an Advisory Group on Reconciliation, formed part of the Operational Design Framework consultation in spring 2024. The important views of consultees and other stakeholders on promoting reconciliation continue to be considered in the ongoing policy development process, which will take account of further engagement.

The Act does not define reconciliation, and the Commission is clear that it cannot impose a definition. However, it is the case that each Requesting Individual has their own perspective on reconciliation. In practical and operational terms, the Commission's three core organisational principles, the embedding of a victim-centred TRIM, and the rigorous adherence to Section 75 of the Northern Ireland Act 1998, provide a foundation upon which the Commission seeks to implement its statutory duty. Taking account of these factors, the Commission is endeavouring to build a culture of conscientious consideration to the promotion of reconciliation across all business areas.

Financial review

This is the first Annual Report and Accounts document prepared by the Commission for a full financial year (2024–25). The Annual Report and Accounts for 2023–24 covered a period of four months.

Going concern

The Commission prepares financial statements in accordance with the UK Government Financial Reporting Manual (FRM), which has adapted going concern for non-trading entities to be based on the anticipated continuation of the provision of a service in the future, as evidenced by inclusion of financial provision for that service in published documents.

The Commission's sponsoring body is the Northern Ireland Office (NIO) as laid out in the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023. The Commission's budget for 2025–26 has been approved by the NIO and published in the main supply estimates for 2025–26.

The Commission has also received a further three-year financial settlement as part of the UK Government Spending Review (SR) phase 2 covering the period up to 2028–29. The Commission's investigative expenses are met through the Annually Managed Expenditure (AME) process and as such were not included in the SR. The treatment of these costs as AME was not changed in the SR.

As a result of this Spending Review settlement, the Accounting Officer has reasonable expectation that the Commission can continue for a period of 12 months from the date of approval of the Annual Report and Accounts and has accordingly considered it appropriate to adopt a going concern basis for the preparation of the 2024–25 financial statements.

On 19 September 2025, the governments of the UK and Ireland announced a joint framework to address the Legacy of the Troubles. This framework sets out proposed changes to the Legacy Act with the expectation that the work of the Commission will continue. Under the FRM interpretation of IAS1 Presentation of Financial Statements, as the Commission's activities will continue to be provided and the purpose of the Commission will not change, we have continued to prepare these financial statements on a going concern basis.

Financial results

The Commission obtained, via the sponsor department the NIO, Parliamentary approval for our 2024–25 budget. The then Secretary of State for Northern Ireland

wrote to the Commission, on foundation, setting out its funding mechanism, including the use of AME to fund investigative work undertaken by the Commission³.

As stated above, 2024–25 was the first full financial year of operation by the Commission, so any comparison to the previous year's figures (four-month period) needs to take this into consideration.

During 2024–25 the Commission drew down £14.279m (2023–24 £1.533m) in Grant in Aid, as disclosed in the Statement of Changes in Taxpayers' Equity.

The total operating and finance expenditure brought to account within the Statement of Comprehensive Net expenditure was £14.994m during 2024–25 (2023–24 £2.214m). Finance income was also recognised of £0.018m (2023–24 nil), resulting in a total net expenditure for the year of £14.976m.

Capital expenditure during the year was £13.051m (2023–24 £1.338m) consisting of property, plant and equipment costs of £4.711m (2023–24 £0.351m) and right of use assets of £8.340m (2023–24 £0.987m) (see notes 6 and 7).

Staff costs (note 2) amounted to £9.032m (2023–24 £1.429m) of the total expenditure in 2024–25, this relates to staff employed, loaned or seconded from elsewhere, by the Commission. The total number of staff increased over the period, from 47 at 31 March 2024 to 169 at 31 March 2025.

ICRIR staff were admitted to the NILGOSC pension scheme from 1 April 2024. An actuarial report was commissioned to determine the value of any pension liability of the Commission as at 31 March 2025. The scheme's actuary valued the scheme with a pension surplus of £0.234m however an asset has not been recognised in the Commission's Statement of Financial Position, due to the uncertainty over whether the refunds would ever materialise (see note 14d for more detail). Staff on loan or secondment are recharged to the Commission gross of all their staff costs, including their home entity's own pension scheme costs.

Other expenditure totalled £5.910m in 2024–25 (2023–24 £0.785m). The major areas of other expenditure were professional fees £0.979m (2023–24 £0.297m), consultancy £0.972m (2023–24 £0.204m), depreciation £0.956m (2023–24 nil) and IT expenditure £0.513m (2023–24 £0.017m). Also within other expenditure was £0.160m (2023–24 £0.065m) relating to the external auditor's remuneration and expenses.

The Statement of Financial Position shows net liabilities of £1.378m (2023–24 £0.681m). In the Commission's first full year of operations, there has been substantial capital investment including the addition of new property leases.

³ <https://icrir.independent-inquiry.uk/document/icrir-funding-letter>

Liabilities include a provision for future dilapidations related to those leases and a creditor balance with the sponsor department at 31 March 2025.

Non-current assets consist of two leasehold premises in Belfast and a further site in London. The leases have been accounted for in accordance with International Financial Reporting Standard 16 (IFRS16) and the expenditure disclosed in notes 6 and 7 to the accounts; including fit-out costs, the total capitalised expenditure at 31 March 2025 is £14.389m (31 March 2024 £1.338m). Depreciation of £0.956m was charged in 2024–25 (2023–24 nil) resulting in a net valuation at 31 March 2025 of £13.433m (31 March 2024 £1.338m).

Within trade and other payables are capital accruals relating to the fitouts of the leasehold premises described above and a creditor with the NIO for transactions processed through the UK Government's shared service provider.

Sustainability reporting

The Commission is committed to making our estate and operations low impact on the environment and more sustainable and, where possible, we support the delivery of the UK Government's Greening Government Commitments (GGCs).

The Commission is exempt from the Task Force on Climate-related Financial Disclosures (TCFD) for the following reasons:

- The ICRI is not a central government department.
- The Commission has less than 500 employees and has received less than £500m in Grant in Aid.
- The Commission has not been instructed by our sponsoring department (Northern Ireland Office), to follow the TCFD's guidance.

Due to the Commission becoming operational in May 2024, the NIO did not set any targets for us to report on for the GGC 2021 to 2025 period. Additionally, our usage of buildings is not within our control, so we cannot report on the core areas of emissions, water and waste consumption.

As such, a full sustainability report has not been included in this annual report.

However, below we have detailed the current initiatives that the Commission has already implemented or is developing in relation to sustainability practices.

Our environmental and sustainability policy is currently under development, and we expect that this will be published in 2025. The policy will outline our approach to minimising environmental impact, in the areas we control, across our operations. It will address resource management, carbon footprint reduction, and our contributions

to environmental sustainability, ensuring that our practices are environmentally responsible and aligned with global sustainability standards.

On 24 February 2025, the UK Procurement Act 2023 came into effect. This legislation provides the Commission with greater opportunities to actively consider sustainability within procurement decisions, including the ability to consider factors relating to environmental sustainability and social impact when awarding contracts.

The Commission also encourages the prioritisation of sustainable transportation, including the use of public transportation whenever possible. Our policies also encourage staff to be mindful of the environmental impact of their travel choices, and only travel when necessary, promoting virtual meetings as a more sustainable alternative when appropriate.

Our Belfast and London headquarters are centrally located, enabling access to public transportation options, whilst remaining mindful of individuals with accessibility requirements.

A handwritten signature in black ink that reads "Louise Warde Hunter". The script is cursive and fluid.

Louise Warde Hunter
Chief Executive Officer and Commissioner
Accounting Officer

06 October 2025

Accountability report

The accountability report includes the corporate governance report, the remuneration and staff report and the parliamentary and audit report. These sections reflect the financial and parliamentary accountability reporting requirements.

Corporate governance report

The corporate governance report contains three sections:

- Directors' report
- Governance statement.
- Statement of Accounting Officer's responsibilities

Directors' report

Statutory background

The Commission is established as a body corporate under the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023 (the Act). The principal objective of the Commission in exercising its functions is to promote reconciliation.

It has been administratively classified by the Cabinet Office as a non-departmental public body (NDPB) sponsored by the NIO. The NIO ICRIR Framework document agreed on 14 December 2023, sets out the broad governance framework within which the Commission and NIO operate.

The Commission operates independently of the UK Government, the Northern Ireland Executive, and all other public authorities.

Commission leadership

The Commission is led by a Board of seven Commissioners, chaired by the Chief Commissioner, Sir Declan Morgan.

The Board consists of the Chief Commissioner, Commissioner for Investigations and the Chief Executive Officer who are executive members of the Board and four Non-Executive Commissioners. Lindsay Todd is the Lead Non-Executive Commissioner and Chair of the Audit and Risk Committee.

The Chief Executive Officer is also the designated Accounting Officer for the Commission, with direct accountability to Parliament for the use of public funds. The Chief Executive Officer, Louise Warde Hunter, took up post in August 2024 and was formally appointed as a Commissioner and Accounting Officer in September 2024.

The membership of the Board throughout the reporting period is outlined below. A list of Board and Committee members with their attendance for the period covering 1 April 2024 to 31 March 2025 can be found on page 36 of the governance statement.

Board membership 2024–25

Members of the ICRIIR Board from 1 April 2024 to 31 March 2025

Name	Position	Appointed as Commissioner
Sir Declan Morgan	Chief Commissioner	14 December 2023 for five-year term
Peter Sheridan	Commissioner for Investigations	14 December 2023 for five-year term
Tristan Pedelty (until 6 September 2024)	Chief Executive Officer and Commissioner	14 December 2023 for a six-month term extended until 6 September 2024
Louise Warde Hunter (from 7 September 2024)	Chief Executive Officer and Commissioner	7 September 2024 for a five-year term
Lindsay Todd	Lead Non-Executive Commissioner	14 December 2023 for a four-year term
Rogelio Alonso	Non-Executive Commissioner	14 December 2023 for a three-year term
Brice Dickson	Non-Executive Commissioner	14 December 2023 for a three-year term
Kathleen Russ	Non-Executive Commissioner	14 December 2023 for a four-year term

Register of interests

The Commission maintains a register of Board members' interests. Declarations of any new interests is a standing agenda item for all Board and Committee meetings.

Registers of interest for Board members are published on the Commission website⁴.

⁴ [ICRIIR Register of Interests - January 2025 - Independent Commission for Reconciliation and Information Recovery](#)

Personal data incidents

The Commission takes very seriously its responsibilities in protecting the privacy of individuals and the security of information entrusted to us. We are working to implement robust data protection practices into every aspect of our work to ensure compliance with GDPR and alignment with our organisational values.

For the period of 1 April 2024 to 31 March 2025, the Commission's Data Protection Officer recorded two incidents that met the threshold for reporting to the Information Commissioner's Office (ICO). On both occasions, the ICO subsequently confirmed that no further action was required.

The most significant of these incidents was a limited data breach in which the names of 25 people, principally Requesting Individuals, were mistakenly disclosed to a single recipient who had previously sought assistance from the Commission. In line with the Commission's firm commitment to our values, a statement explaining the incident was published on the Commission's website, detailing the action that was taken and apologising for the error.

The Commission also experienced a further reportable data breach following the year end. This incident occurred when an email was sent to an individual, where an incorrect document had been attached. Rather than formal correspondence, the individual received a document intended for internal use. Most of the information contained was a matter of public record, however the document contained some additional personal data, which met the threshold for reporting to the ICO.

Formal investigations into these incidents have now concluded, with the accompanying action plan in delivery.

Policies and procedures for data protection remain under review and will be updated following learning from the investigation and in line with the principle of continuous improvement.

There have been seven non-reportable personal data breaches from 1 April 2024 to 31 March 2025, each of which was contained. The most common type of personal data incident reported were emails sent to the incorrect recipient, which has led to the auto populate function being switched off at an organisational level by our IT provider to mitigate the risk of human error.

The Commission also records any 'near misses' to ensure that our approach to continuous improvement is robust and evidence based. Our responses to these incidents have already resulted in delivered, or planned, improvements to our handling procedures. Additional technical controls have been implemented to mitigate the risk of human error, with further significant technical controls planned for autumn 2025. Commission employees are required to complete mandatory training on GDPR obligations within one month of joining the organisation, alongside annual

refresher training. Work continues to ensure that the Commission builds data privacy into all processes, to ensure a data protection by design and default approach.

Governance statement

As Accounting Officer, the Chief Executive Officer is responsible for maintaining a sound system of internal control that supports us to achieve our policies, aims and objectives. This system must safeguard the public's funds and our assets, for which the Accounting Officer is responsible in accordance with the responsibilities assigned in 'Managing Public Money'⁵.

The governance statement describes the corporate governance and risk management arrangements for the year to 31 March 2025.

⁵ [Managing Public Money.pdf](#)

Governance structure

The following diagram details the Commission's governance structure throughout the reporting period.



Continuous improvement

Ensuring that good governance is embedded across the Commission to support robust and accountable decision-making, at the right levels, was a key focus of the Commission's work since its establishment in December 2023 and the Commission's 2024–25 Work Plan outlines a commitment to continuous improvement in this area.

Having had the opportunity to test the framework, and following work with an independent consultant, the Commission undertook a review of all Board Committee terms of reference, which was completed in the 2024–25 financial year, with changes approved by the Board on 2 June 2025.

Board

The Board of Commissioners has collective responsibility for setting the strategic direction of the Commission to enable it to deliver its functions, as set out in the Act.

Individual Board members are required to act in accordance with the provisions of the Framework Document, with particular reference to acting in good faith and in the best interests of the Commission and adhering to the Commission's Code of Conduct, which complies with the Cabinet Office's 'Code of Conduct for Board Members of Public Bodies' (2019). All Board members and officers must act in accordance with the 'Seven Principles of Public Life' and the Commission's stated values.

An externally facilitated review of the Board's effectiveness was undertaken in June 2024 to assess the overall performance of the Board at an early stage of its evolution and to suggest any structural, cultural or procedural improvements that could be made. Feedback from Board members on the quality of papers was received and improvements have been made to the format, ensuring greater conciseness and clarity. We continue to seek regular feedback from Board members on the quality and relevance of papers.

Board meetings

The table below outlines the attendance of members at Board meetings, which met nine times during the reporting period.

Name	Position	Meetings attended in reporting period
Sir Declan Morgan	Chief Commissioner	9/9
Peter Sheridan	Commissioner for Investigations	9/9
Tristan Pedelty (until 6 September 2024)	Chief Executive Officer and Commissioner	6/6
Louise Warde Hunter (from 7 September 2024)	Chief Executive Officer and Commissioner	4/4
Lindsay Todd	Lead Non-Executive Commissioner	9/9
Rogelio Alonso	Non-Executive Commissioner	9/9
Brice Dickson	Non-Executive Commissioner	9/9
Kathleen Russ	Non-Executive Commissioner	9/9

The Commission publishes a summary of Board meetings on our website. In 2024–25 the Board:

- Approved the annual work plan 2024–25.
- Approved the Annual Report and Accounts 2023–24.
- Approved the Commission’s risk appetite and risk management framework, on the recommendation of Audit and Risk Committee and management.
- Developed and agreed Board objectives for 2024–25.

Audit and Risk Committee

The Audit and Risk Committee (ARC) operates independently under delegated authority of the ICRIIR Board. The committee’s role is to support the Board and Accounting Officer in discharging their responsibilities for issues of risk, control and governance. The committee supports the Board and the Accounting Officer in these responsibilities by reviewing the comprehensiveness of assurances and assessing the reliability and integrity of these assurances.

The table below outlines the attendance of members at the ARC, which met five times during the reporting period.

Name	Role	Meetings attended in reporting period
Lindsay Todd	Chair	5/5
Kathleen Russ	Member	5/5
Martin Pitt	Independent Member	4/5

The Commission's Chief Executive Officer, Chief Operating Officer, and senior members of Internal Audit and the National Audit Office (NAO) also attend the ARC meetings. A representative of the NIO is also invited to attend relevant meetings as an independent observer, at the discretion of the chair.

As would be expected with a new and evolving organisation, the meetings of the ARC throughout the reporting period placed considerable focus on:

- Providing feedback and constructive critique to assist with the ongoing iteration and scrutiny of the Commission's corporate risk register and roll-out of the Commission's risk management approach.
- Conducting deep dives into specific risk areas.
- The development of a comprehensive Internal Audit strategy with appointed auditors Sumer NI.

Remuneration and Nomination Committee

The Remuneration and Nomination Committee (REMC) was established to support and advise the Board in discharging its responsibilities on any matters relating to executive remuneration and the appointment of the Chief Executive and Commissioner for Investigations.

The table below outlines the attendance of members at the REMC, which met six times during the reporting period.

Name	Role	Meetings attended in reporting period
Sir Declan Morgan	Chair	6/6
Kathleen Russ	Member	6/6
Lindsay Todd	Member	6/6
Aidene Walsh	Independent Member	6/6

Over the course of the reporting period, the REMC:

- Oversaw the recruitment process for the Commission's Chief Executive Officer.
- Approved the recommendation for a new Executive Leadership role to ensure that the Commission's people and culture could be given the strategic focus required in a developing organisation.
- Commissioned an exercise on contingency planning in the event of the absence of senior executives.

The review of the Commission's governance framework facilitated an opportunity for the REMC to consider an update to the terms of reference, to ensure the strategic prioritisation of issues relating to the Commission's growing work force. The proposed changes, which will take effect in the 2025–26 reporting period, will broaden the scope of the committee's responsibility beyond solely focusing on executive pay, to encompass the wider impact of pay and working practices on the workforce, employee engagement, and corporate culture.

Investigative Oversight Committee

The Investigative Oversight Committee (IOC) is a committee of the Board established to monitor active investigations and ensure they are carried out in line with the requirements of the legislation and the Commission's policies and procedures.

The table below outlines the attendance of members at the IOC meetings, which met nine times during the reporting period.

Name	Role	Meetings attended in reporting period
Peter Sheridan	Chair	8/9
Kieran Rix	Member	7/9
Steven Bramley	Member	8/9

Executive Leadership Team

The Chief Executive Officer is supported by the Executive Leadership Team (ELT)⁶. The ELT oversees the Commission's operational performance and delivery. These meetings focus on strategic leadership, management and direction, ensuring the

⁶ Executive Leadership Team (ELT) was previously known as the Executive Committee (ExCo).

most effective prioritisation of resources and makes recommendations to the Board as necessary.

The composition of the ELT changed within the reporting period, with the new Head of Findings joining following appointment, and a decision not to replace the Director of Strategy, Performance and Planning, but to subsume those responsibilities in other directorates. This is reflected in the following table which outlines attendance.

Name	Role	Meetings attended in reporting period
Tristan Pedelty	Chair (until 6 September 2024)	7/7
Louise Warde Hunter	Chair (from 7 September 2024)	12/12
Nikki Bodel	Head of Governance and Board Secretary	18/18
Alison Beckett	Director of Strategy, Performance and Planning (until 10 December 2024)	13/14
Kieran Rix	Chief Operating Officer	16/18
Steven Bramley	General Counsel	16/18
Claire Welch	Head of Findings (from 7 October 2024)	7/9
Peter Sheridan	Commissioner for Investigations	14/18

In the first half of the reporting period, a requirement for strategic decisions to be taken at significant pace in the lead up to and following the operationalisation of the Commission's functions on 1 May 2024, necessitated an increase in frequency of meetings. This continued in the latter half of the reporting period to ensure the new CEO was able to gain a rapid understanding of the Commission's operational performance and delivery.

Over the course of the reporting period the ELT:

- Oversaw the commencement of the Commission's 'go-live' date on 1 May 2024.
- Approved and implemented the Commission's Operational Design Framework following a period of public consultation and refinement.
- Implemented initiatives to address barriers to efficient recruitment whilst balancing the essential requirements for security clearance.
- Finalised the Commission's establishment programme and transitioned activities and risk ownership into the Commission's business-as-usual workstreams.
- Contributed to the development of a comprehensive programme of engagement with key stakeholders to increase understanding of the Commission's work.

Risk management

Within this reporting period the Commission's commencement of operations occurred on 1 May 2024. This required the transition from programme risk management techniques utilised during the Commission's development, to the establishment of a corporate risk register to support the ARC in reporting to the Board on their analysis of risk.

The most significant strategic risks faced by the Commission during the reporting period included: the uncertain legislative context impacting on the Commission's ability to build public confidence; ensuring appropriate budgetary provision within a tight fiscal environment; and the requirement to ensure appropriate resource across the organisation, to meet demand from Requesting Individuals for investigations.

The corporate risk register is reviewed regularly by the ARC, with individual strategic level risks assigned to members of the Commission's ELT for proactive management and mitigation. In parallel, the approach to embedding the identification and management of live risks within business areas was refined and implemented through a risk and issue management policy, which is kept under continuous review. The Commission's Senior Leadership Team also conducts a regular review of live risks within their areas, supported by the Commission's dedicated risk experts. Training for all Commission employees on the approach was delivered throughout March 2025. We adhere to the principles for risk management set out in His Majesty's Treasury's 'Orange Book'.

Internal audit opinion

Within the context of our rapidly growing organisation, ensuring the robustness of our internal processes has been, and will remain, a key priority for the Commission's leadership. To support the ongoing refinement of the systems of internal risk management, corporate governance and control that were conferred upon the Commission following the set-up phase, we commissioned the services of an

independent internal audit provider to review and provide feedback on our internal control mechanisms and identify priority actions to strengthen our corporate processes.

Our appointed internal auditors utilise a three-point scale in their assessments, satisfactory, limited and unacceptable. This differs from the UK Government Internal Audit Agency four-point scale and therefore may not be directly comparable with other public bodies. The reviews conducted by the internal auditors in 2024–25 returned one satisfactory and three limited assurance ratings. This resulted in an overall assessment of limited assurance for 2024–25.

Priority recommendations related to the strengthening of financial systems, contractual relationships with third party data processors, further development of financial policies and procedures, and procurement documentation and records keeping. Significant work is now underway to action the recommendations, and with the resulting strengthening of these areas, we expect in subsequent years to see an improvement to the overall assessment. This will be supported by a comprehensive internal audit strategy for 2025–26 and 2027–28 that was approved by the ARC in June 2025.

Additional controls and processes

A Code of Conduct for ICRIR staff was published on 14 December 2023 on the Commission's website. The code sets out the principles for how all in the Commission should act, from Commissioners to investigative staff and corporate support officers. It covers those on secondment, loans, fixed term contracts, via agencies and contracted arrangements. The code demonstrates how all Commission staff should carry out their work in accordance with and upholding the clear values of the organisation. All staff receive training on the Code of Conduct at induction.

Declaration and management of outside interests

Commissioners, officers or members of staff, secondees or those otherwise engaged by the Commission are required to abide by the Seven Principles of Public Life and the Commission's Code of Conduct. The Commission's Policy for the Declaration and Management of Outside Interests (DMOI) outlines: types of outside interests; the expected standards when declaring and managing relevant outside interests; how to consider whether a perceived, potential or actual conflict exists; and what action must be taken in those circumstances.

Gifts and hospitality

The Commission's gifts and hospitality policy outlines the process to be followed in the event of the offering of a gift or hospitality to any Commissioner, officer or member of staff, secondees or those otherwise engaged by the Commission and for the provision of hospitality, where appropriate.

Complaints

The Commission published its Complaint Handling Procedure in February 2024. Training on complaints was delivered to all staff in March 2024. Where complaints relate to the use of significant police powers, the Commission has agreed arrangements with the Independent Office for Police Conduct (IOPC), the Police Investigations and Review Commission (PIRC), and the Police Ombudsman for Northern Ireland (PONI) to provide independent oversight by designated Commission officers in England and Wales, Scotland and Northern Ireland respectively. Details of these agreements can be found on the Commission's website.

One complaint was received by the Commission during the reporting period but was subsequently deemed to be outside of the scope of the Commission's remit.

Raising a concern

The Commission recognises the importance of an effective policy that enables individuals to raise concerns about wrongdoing that may affect the public interest. The current policy was adopted in December 2023 and is undergoing review with a view to improving clarity and ensuring it is fully aligned with our organisational culture.

In December 2024, the Board agreed that it would nominate a 'Board Champion' for whistleblowing, reinforcing the Commission's commitment to public accountability. By acting as a visible advocate at the highest level, the Board Champion will ensure that raising concerns under the Commission's whistleblowing policy is not treated as simply a procedural formality, but that it is a strategic priority. The Board formally appointed the non-executive champion at its meeting on 2 June 2025.

There were no reports made through the formal raising a concern mechanism in this reporting period.

Statement of Accounting Officer's responsibilities

Under the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023 (the Act), the Commission has prepared accounts for the financial period ended 31 March 2025, in respect of the monies provided by the UK Government in the form and on the basis set out in the Accounts Direction issued by the NIO and which His Majesty's Treasury (HM Treasury) has approved.

The Commission shall prepare accounts for the financial period ended 31 March 2025 and subsequent financial years in compliance with the accounting principles and disclosure requirements of the edition of the UK Government Financial Reporting Manual issued by HM Treasury (the FReM) which is in force for the financial period for which the accounts are being prepared, in line with the Accounts Direction referred to above.

The accounts are prepared on an accruals basis and must:

- 1) Give a true and fair view of the state of affairs of the Commission as 31 March 2025 and subsequent financial year-ends, and of the income and expenditure (or, as appropriate, net resource outturn), changes in Taxpayer's Equity and cash flows for the financial year.
- 2) Provide disclosure of any material expenditure or income that has not been applied to the purposes intended by Parliament or material transactions that have not conformed to the authorities that govern them.

In preparing the accounts, the Accounting Officer is required to comply with the requirements of the FReM and in particular to:

- Observe the Accounts Direction issued by the NIO, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis.
- Make judgements and estimates on a reasonable basis.
- State whether applicable accounting standards as set out in the FReM have been followed, and disclose and explain any material departures in the accounts.
- Prepare the accounts on a going concern basis.
- Confirm that the Annual Report and Accounts as a whole is fair, balanced and understandable, and take personal responsibility for the Annual Report and Accounts and the judgments required for determining that it is fair, balanced and understandable.

The Principal Accounting Officer at the Northern Ireland Office, with the consent of HM Treasury, has appointed the Chief Executive Officer of the Commission as the Accounting Officer. The responsibilities of an Accounting Officer, including responsibility for the propriety and regularity of the public finances for which the

Accounting Officer is answerable, for keeping proper records, and for safeguarding the Commission's assets, are set out in Managing Public Money published by HM Treasury.

As the Accounting Officer, I have taken all the steps that I ought to have taken to make myself aware of any relevant audit information and to establish that the Commission's auditors are aware of that information. So far as I am aware, there is no relevant audit information of which the auditors are unaware.

A handwritten signature in black ink that reads "Louise Warde Hunter". The script is cursive and fluid, with the first name "Louise" written in a larger, more prominent hand than the last name "Hunter".

Louise Warde Hunter
Chief Executive Officer and Commissioner
Accounting Officer

06 October 2025

Remuneration and staff report

Remuneration

Remuneration Policy

The Commission has adopted a single pay range, consisting of five pay bands for all staff below senior leadership level, which is modelled on wider public sector pay in equivalent bodies. Reflecting that the Commission needs to draw from labour markets in Northern Ireland and Great Britain, including London, the Commission has adopted a single scale based on those locations. The flatter pay band structure allows the Commission to provide more varied roles, with greater opportunity of career development in the more junior bands. The pay framework the Commission has adopted reduces the risk of pay parity claims and is in line with Public Sector Pay Remit Guidance. All salaries are benchmarked in the context of the Commission's wider employee value proposition, which includes a competitive pension, investment in learning and development, a supportive work environment, and family friendly policies.

A 5% pay award was made in March 2025 for directly employed staff who commenced employment prior to 1 October 2024 and had successfully completed their six-month probation.

Remuneration (including salary) and pension entitlements (audited information)

The following sections provide details of the remuneration and pension interests of the most senior management (i.e. Board members) of the Commission. The Chief Commissioner and the Non-Executive Commissioners are public office holders and are not employees of the Commission. The Chief Executive Officer and the Commissioner for Investigations are employees, as well as being statutory public office holders.

Remuneration (audited)

Unless otherwise stated, the official start dates for all Commissioners and officials was 14 December 2023. The Chief Executive Officer, Louise Warde Hunter, took up post in August 2024 and was formally appointed as a Commissioner in September 2024. The Chief Operating Officer, Kieran Rix, resigned in August 2025.

Single total value of remuneration – Board members

	Salary (£000)		Pension benefits (£000)		Total (£000)	
	2024–25	2023–24	2024–25	2023–24	2024–25	2023–24
Board members						
Chief Commissioner Sir Declan Morgan	150-155	45-50 (140-145 FYE)	-	-	150-155	45-50
Commissioner for Investigations Peter Sheridan	145-150	45-50 (145-150 FYE)	45	-	190-195	45-50
CEO and Commissioner Tristan Pedelty (secondment ended September 2024)	60-65 (145-150 FYE)	45-50 (145-150 FYE)	57	91	115-120	135-140
CEO and Commissioner Louise Warde Hunter (appointed August 2024)	90-95 (145-150 FYE)	-	28	-	120-125 (175-180 FYE)	-
Non-Executive Commissioner Lindsay Todd	20-25	5-10 (15-20 FYE)	-	-	20-25	5-10
Non-Executive Commissioner Kathleen Russ	15-20	5-10 (15-20 FYE)	-	-	15-20	5-10
Non-Executive Commissioner Rogelio Alonso	15-20	5-10 (15-20 FYE)	-	-	15-20	5-10
Non-Executive Commissioner Brice Dickson	15-20	5-10 (15-20 FYE)	-	-	15-20	5-10

Single total value of remuneration – Other officials

	Salary (£000)		Pension benefits (£000)		Total (£000)	
	2024–25	2023–24	2024–25	2023–24	2024–25	2023–24
Other Officials						
Chief Operating Officer Kieran Rix (resigned August 2025)	105-110	35-40 (105-110 FYE)	35	-	140-145	35-40
Director of Strategy, Planning and Performance Alison Beckett (from May 2024 to December 2024)	50-55 (90-95 FYE)	-	16	-	65-70	-
Head of Findings Claire Welch (appointed September 2024)	60-65 (120-125 FYE)	-	20	-	80-85	-
Head of Governance and Board Secretary Nikki Bodel (secondment ended March 2025)	90-95	25-30 (70-75 FYE)	29	9	120-125	30-35
General Counsel Steven Bramley	130-135	30-35 (125-130 FYE)	30	-	160-165	30-35

Salary and remuneration

'Salary' includes gross salary, overtime, reserved rights to London weighting or London allowances, recruitment and retention allowances, and any other allowance to the extent that it is subject to UK taxation. This report is based on accrued payments made by the Commission and thus recorded in these accounts.

Additional payments were made to two Commissioners, Lindsay Todd and Kathleen Russ of £1k and £3.5k respectively. This was in recognition of additional time commitment required from these individuals as a result of commencement of operations at the Commission.

Benefits in kind

The monetary value of benefits in kind covers any benefits provided by the employer and treated by HM Revenue and Customs as a taxable emolument. Benefits in kind were nil for 2024–25 (2023–24 nil).

Pension Benefits

Northern Ireland Local Government Officers' Superannuation Committee scheme

The Commission participates in the Northern Ireland Local Government Officers' Superannuation Committee (NILGOSC) pension scheme and makes contributions for employees each month. The pension scheme is known as the Local Government Pension Scheme Northern Ireland and is a funded multi-employer defined benefit scheme. NILGOSC is the corporate body responsible for the administration of the scheme. The Scheme Actuary, AON, is responsible for carrying out full valuations every three years. The latest full actuarial valuation was 31 March 2022. The outcome of this valuation was used as the basis for the valuation at 31 March 2025 and to set the level of contributions for employers from 1 April 2022 to 31 March 2025.

The benefits paid under the Scheme are based on length of membership and final salary. NILGOSC maintains a fund to provide for the payment of current and prospective benefits to members of the scheme. In order to ensure that this objective is achieved, the Committee must determine a suitable investment strategy, which provides both a high return on investments and an acceptable level of risk.

For any membership accrued before 1 April 2009, benefits will accrue at a rate of 1/80th of the employee's final year pensionable pay and an automatic tax-free lump sum of three times their pension. For all membership accrued from 1 April 2009, benefits accrue at a rate of 1/60th of final pensionable pay for each year of service but with no automatic lump sum (members can choose to give up some of their

pension to provide a lump sum). Additional Voluntary Contributions (AVC) can be paid through the NILGOSC in-house AVC provider, Prudential.

All assets, liabilities and operating costs relating to the pension scheme are accounted for in the Commission's financial statements.

Employee contribution rates for all members for the period 1 April 2024–31 March 2025 were as follows:

Band	Range	Contribution rate
1	£0 to £18,000	5.5%
2	£18,001 to £27,700	5.8%
3	£27,701 to £46,300	6.5%
4	£46,301 to £56,300	6.8%
5	£56,301 to £111,700	8.5%
6	More than £111,700	10.5%

The employer contribution rate for 2024–25 was 14.7%. Further details about the NILGOSC pension scheme can be found in note 14 and at www.nilgosc.org.uk.

The Civil Service and others pension scheme

Seconded employees are members of the Principal Civil Service Pension (PCSP) scheme. Further details about the PCSP scheme features and benefits can be found in the resource accounts of the Cabinet Office: Civil Superannuation, www.civilservicepensionscheme.org.uk.

The pension information for those listed in the PCSP scheme table below follows guidance in the Employer Pension notice EPN727 issued by the Civil Service Pensions. Pension benefits are provided through the Civil Service pension arrangements.

The Civil Servants and Others Pension Scheme or alpha, provides benefits on a career average basis with a normal pension age equal to the member's State Pension Age (or 65 if higher).

These statutory arrangements are unfunded with the cost of benefits met by monies voted by Parliament each year and increased annually in line with pensions increase legislation.

Other arrangements include money purchase pensions known as a 'partnership', which are available as an alternative. The employer makes an age-related basic contribution of 14.75% into a stakeholder pension product chosen by the employee from a panel of providers. The employee does not have to contribute.

Another 'partnership' is available as an alternative. The employer makes an age-related basic contribution of 3% into a stakeholder pension product chosen by the employer from a panel of providers. The employee does not have to contribute.

The pension figures quoted for officials in this report show combined pension earned in all schemes as appropriate

Cash Equivalent Transfer Values

A Cash Equivalent Transfer Value (CETV) is the actuarially assessed capitalised value of the pension scheme benefits accrued by a member at a particular point in time. The benefits valued are the member's accrued benefits and any contingent spouse's pension payable from the scheme. A CETV is a payment made by a pension scheme or arrangement to secure pension benefits in another pension scheme or arrangement when the member leaves a scheme and chooses to transfer the benefits accrued in their former scheme.

The pension figures shown relate to the benefits that the individual has accrued as a consequence of their total membership of the pension scheme, not just their service in a senior capacity to which disclosure applies. The CETV figures, and other pension details, include the value of any pension benefit in another scheme or arrangement which the individual has transferred to the NILGOSC or PCSPS pension arrangements. They also include any additional pension benefit accrued to the member as a result of their purchasing additional years of pension service in the scheme at their own cost.

CETVs are calculated in accordance with The Occupational Pension Schemes (Transfer Values) (Amendment) Regulations 2015 and do not take account of any actual or potential reduction to benefits resulting from Lifetime Allowance Tax which may be due when pension benefits are taken.

Real increase in CETV

This reflects the increase in CETV that is funded by the employer. It does not include the increase in accrued pension due to inflation, contributions paid by the employee (including the value of any benefits transferred from another pension scheme or arrangement) and uses common market valuation factors for the start and end of the period.

NILGOSC scheme (audited)

	Accrued pension at pension age as at 31 March 2025 £000	Real increase in pension and related lump sum at pension age £000	CETV at 31 March 2025 £000	CETV at 31 March 2024 £000	Real increase in CETV £000
Board members					
Commissioner for Investigations					
Peter Sheridan	0-5	2.5-5	58	0	42
Chief Executive Officer and Commissioner					
Louise Warde Hunter	0-5	0-2.5	33	0	23
Other officials					
Chief Operating Officer					
Kieran Rix	0-5	0-2.5	33	0	24
Director of Strategy, Planning and Performance					
Alison Beckett	0-5	0-2.5	14	0	9
Head of Findings					
Claire Welch	0-5	0-2.5	16	0	10
General Counsel					
Steven Bramley	0-5	0-2.5	35	0	25

PCSP scheme

	Accrued pension at pension age as at 31 March 2025 £000	Real increase in pension and related lump sum at pension age £000	CETV at 31 March 2025 £000	CETV at 31 March 2024 £000	Real increase in CETV £000
Board members					
Chief Executive Officer and Commissioner					
Tristan Pedelty	35-40	2.5-5	609	550	40
Other officials					
Head of Governance and Board Secretary					
Nikki Bodel	10-15	0-2.5	129	101	14

Fair pay disclosures (audited)

Reporting bodies are required to disclose the relationship between the remuneration of the highest paid director in their organisation and the median remuneration of the organisation's workforce. Commissioners that are not also officials are excluded from the below information.

	2024-25	2023-24
Band of highest paid director (FYE total Remuneration)	£145,000-£150,000	£145,000-£150,000
Percentage change in pay and bonuses for highest paid director	0%	0%
Median total pay and benefits ratio	2.95	2.44
Median total pay and benefits	£50,000	£60,520
Ratio between highest paid director and 25th percentile	3.21	2.87
25th percentile total pay and benefits	£46,000	£51,323
Ratio between highest paid director and 75th percentile	2.49	2.01
75th percentile total pay and benefits	£59,246	£73,499

Agency and temporary resources have been excluded from the above calculations as their pay arrangements would give rise to a distorted result and not be reflective of the pay across the entity as a whole nor provide a level of comparability to the previous financial year.

Total remuneration includes salary and benefits-in-kind. The Commission does not offer any non-consolidated performance-related pay, but if it did this would also be included. It does not include severance payments, employer pension contributions and the cash equivalent transfer value of pensions. For the Commission there is no difference between total remuneration and the salary component of total remuneration.

In 2024–25, no other employee received remuneration in excess of the highest paid director. Remuneration ranged from £31,000 to £149,621. The decrease in median, 25th and 75th percentile pay and benefits reflect the significant increase in staff numbers across a wider range of pay band roles, illustrating the increase in the operational activities of the Commission since initial set up in 2023–24.

Staff report

Staff and Commissioner numbers and related costs (audited)

				Year ended 31 March 2025	Four months 2023-24
	Permanently employed staff £000	Commissioners £000	Others (including loanees and inward secondments) £000	Total £000	Total £000
Wages and salaries	3,447	570	3,438	7,455	1,130
Social security costs	397	65	191	653	117
Other pension costs	479	51	394	924	182
Total staff costs	4,323	686	4,023	9,032	1,429

Staff numbers

At 31 March 2025, the Commission employed 169 staff (166.85 FTE). At 31 March 2024, the Commission employed 47 staff (46.8 FTE).

	2024–25	2023–24
Permanent staff	124	11
Others	45	36
Total	169	47

The average number of full-time equivalent persons employed during the period was as follows (audited):

	2024–25	2023–24
Permanent staff	121	7
Others	45	32
Total	166	39

Staff composition

The number of staff during the period and an analysis of staff-in-post (headcount) as at 31 March 2025 and 31 March 2024 by gender are shown below.

	2024–25			2023–24		
	Total staff employed	Executive Commissioners and ELT members	Others	Total staff employed	Executive Commissioners and ELT members	Others
Male	73	3	70	21	4	17
Female	96	3	93	26	1	25
Total composition	169	6*	163	47	5	42

*This figure is not inclusive of the two individuals who left their posts within the reporting period. The Chief Commissioner is also not included given their status as a public appointee as opposed to an employee of the Commission.

Staff turnover

Staff turnover in the year was 24% (four months in 2023–24 2.6%). This is reflective of a number of individuals (22 out of 26 people) whose secondments to the Commission came to an end during the reporting period.

Reporting of compensation schemes – exit packages (audited information)

There were no exit packages in 2024–25 (2023–24 nil).

Reporting of expenditure on consultancy

The Commission incurred £0.972m expenditure on expert advice consultancy during 2024–25 (four-month period in 2023–24 £0.204m), reflecting the need for support for transition and strategy on the establishment of the Commission and the engagement of experts to enhance our trauma-led emotional support.

Reporting of off payroll engagements

There were 4 off payroll worker engagements at 31 March 2025 (2023–2024 1), earning £245 per day or greater, who existed for less than one year at the time of reporting and determined to be outside the scope of IR35. The individuals were not Board members or senior officials with significant financial responsibility.

2024-25	
Number of off-payroll engagements of board members and/or senior officials with significant financial responsibility, between 1 April 2024 and 31 March 2025	-
Total number of individuals on payroll and off-payroll engagements that have been 'board members and/or senior officials with significant financial responsibility', during the financial year. This figure includes both on payroll and off-payroll engagements.	13

Staff engagement and staff policies

There are a range of policies and procedures in place to support staff and line managers, including: additional paternity leave; adoption leave; annual leave; career breaks; conduct and discipline; disability support; equality, diversity and inclusion; flexible working; grievances; managing poor performance; managing performance, maternity support; paternity leave; parental bereavement leave; managing probation; raising a concern; recruitment principles; reward and recognition; shared parental

leave; special leave; study leave; supporting attendance; hybrid working policy, learning and development and pay policy.

Sickness absence

The total number of working days lost due to sickness during the year was 152.5 days (2023–24 nil). The average working days lost for staff members who took sick leave was 12.9 days. The average working days lost for those who took sick leave, but were not on long term sick leave, was 6.6 days.

Employment of people with disabilities and other employee matters

Employment training and advancement of disabled persons and other employee matters are reported on in the performance report.

Trade Union (Facility Time Publication Requirements) Regulations 2017 (Statutory Instruments 328)

No Official in the Commission spent time on trade union activities.

Parliamentary accountability and audit report

Parliamentary disclosures

Regularity of expenditure (audited)

All expenditure was applied to the purpose intended by Parliament.

Losses and special payments (audited information)

There are no losses and special payments to report (2023–24 nil).

Remote contingent liabilities (audited information)

There are no remote contingent liabilities to report (2023–24 nil).

Income in relation to fees and charges (audited information)

No fees and charges were collected (2023–24 nil).

Long term expenditure trends

RDEL will be flat cash in accordance with the Spending Review and AME will float with demand as we continue to grow as a Commission. Any impact of the recent British and Irish governments' announcement on future expenditure will not be possible to estimate until the necessary legislative process has been enacted.



Louise Warde Hunter
Chief Executive Officer and Commissioner
Accounting Officer

06 October 2025

The certificate and report of the Comptroller and Auditor General to the Houses of Parliament

Opinion on financial statements

I certify that I have audited the financial statements of the Independent Commission for Reconciliation and Information Recovery for the year ended 31 March 2025 under the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023.

The financial statements comprise the Independent Commission for Reconciliation and Information Recovery's

- Statement of Financial Position as at 31 March 2025;
- Statement of Comprehensive Net Expenditure, Statement of Cash Flows and Statement of Changes in Taxpayers' Equity for the year then ended; and
- the related notes including the significant accounting policies.

The financial reporting framework that has been applied in the preparation of the financial statements is applicable law and UK adopted international accounting standards.

In my opinion, the financial statements:

- give a true and fair view of the state of the Independent Commission for Reconciliation and Information Recovery's affairs as at 31 March 2025 and its net expenditure for the period; and
- have been properly prepared in accordance with the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023 and Secretary of State directions issued thereunder.

Opinion on regularity

In my opinion, in all material respects, the income and expenditure recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

Basis for opinions

I conducted my audit in accordance with International Standards on Auditing (UK) (ISAs UK), applicable law and Practice Note 10 Audit of Financial Statements and Regularity of Public Sector Bodies in the United Kingdom (2022). My responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of my certificate.

Those standards require me and my staff to comply with the Financial Reporting Council's Revised Ethical Standard 2019. I am independent of the Independent Commission for Reconciliation and Information Recovery in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK. My staff and I have fulfilled our other ethical responsibilities in accordance with these requirements.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Conclusions relating to going concern

In auditing the financial statements, I have concluded that the Independent Commission for Reconciliation and Information Recovery's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Independent Commission for Reconciliation and Information Recovery's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

My responsibilities and the responsibilities of the Accounting Officer with respect to going concern are described in the relevant sections of this certificate.

The going concern basis of accounting for the Independent Commission for Reconciliation and Information Recovery is adopted in consideration of the requirements set out in HM Treasury's Government Financial Reporting Manual, which requires entities to adopt the going concern basis of accounting in the preparation of the financial statements where it is anticipated that the services which they provide will continue into the future.

Other information

The other information comprises information included in the Annual Report, but does not include the financial statements and my auditor's certificate thereon. The Accounting Officer is responsible for the other information.

My opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in my certificate, I do not express any form of assurance conclusion thereon.

My responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the audit, or otherwise appears to be materially misstated.

If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact.

I have nothing to report in this regard.

Opinion on other matters

In my opinion the part of the Remuneration and Staff Report to be audited has been properly prepared in accordance with Secretary of State directions issued under the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023.

In my opinion, based on the work undertaken in the course of the audit:

- the parts of the Accountability Report subject to audit have been properly prepared in accordance with Secretary of State directions made under the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023; and
- the information given in the Performance and Accountability Reports for the financial year for which the financial statements are prepared is consistent with the financial statements and is in accordance with the applicable legal requirements.

Matters on which I report by exception

In the light of the knowledge and understanding of the Independent Commission for Reconciliation and Information Recovery and its environment obtained in the course of the audit, I have not identified material misstatements in the Performance and Accountability Reports.

I have nothing to report in respect of the following matters which I report to you if, in my opinion:

- adequate accounting records have not been kept by the Independent Commission for Reconciliation and Information Recovery or returns adequate for my audit have not been received from branches not visited by my staff; or
- I have not received all of the information and explanations I require for my audit; or
- the financial statements and the parts of the Accountability Report subject to audit are not in agreement with the accounting records and returns; or
- certain disclosures of remuneration specified by HM Treasury's Government Financial Reporting Manual have not been made or parts of the Remuneration and Staff Report to be audited is not in agreement with the accounting records and returns; or

- the Governance Statement does not reflect compliance with HM Treasury's guidance.

Responsibilities of the Accounting Officer for the financial statements

As explained more fully in the Statement of Accounting Officer's Responsibilities, the Accounting Officer is responsible for:

- maintaining proper accounting records;
- providing the C&AG with access to all information of which management is aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;
- providing the C&AG with additional information and explanations needed for his audit;
- providing the C&AG with unrestricted access to persons within the Independent Commission for Reconciliation and Information Recovery from whom the auditor determines it necessary to obtain audit evidence;
- ensuring such internal controls are in place as deemed necessary to enable the preparation of financial statements to be free from material misstatement, whether due to fraud or error;
- preparing financial statements which give a true and fair view in accordance with Secretary of State directions issued under the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023;
- preparing the annual report, which includes the Remuneration and Staff Report, in accordance with Secretary of State directions issued under the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023; and
- assessing the Independent Commission for Reconciliation and Information Recovery's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Accounting Officer anticipates that the services provided by the Independent Commission for Reconciliation and Information Recovery will not continue to be provided in the future.

Auditor's responsibilities for the audit of the financial statements

My responsibility is to audit, certify and report on the financial statements in accordance with the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023.

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a certificate that includes my opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if,

individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Extent to which the audit was considered capable of detecting non-compliance with laws and regulations including fraud

I design procedures in line with my responsibilities, outlined above, to detect material misstatements in respect of non-compliance with laws and regulations, including fraud. The extent to which my procedures are capable of detecting non-compliance with laws and regulations, including fraud is detailed below.

Identifying and assessing potential risks related to non-compliance with laws and regulations, including fraud

In identifying and assessing risks of material misstatement in respect of non-compliance with laws and regulations, including fraud, I:

- considered the nature of the sector, control environment and operational performance including the design of the Independent Commission for Reconciliation and Information Recovery's accounting policies.
- inquired of management, Independent Commission for Reconciliation and Information Recovery's head of internal audit and those charged with governance, including obtaining and reviewing supporting documentation relating to the Independent Commission for Reconciliation and Information Recovery's policies and procedures on:
 - o identifying, evaluating and complying with laws and regulations;
 - o detecting and responding to the risks of fraud; and
 - o the internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations including the Independent Commission for Reconciliation and Information Recovery's controls relating to the Independent Commission for Reconciliation and Information Recovery's compliance with the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023, Managing Public Money;
- inquired of management, Independent Commission for Reconciliation and Information Recovery's head of internal audit and those charged with governance whether:
 - o they were aware of any instances of non-compliance with laws and regulations;
 - o they had knowledge of any actual, suspected, or alleged fraud;
- discussed with the engagement team and the relevant internal specialists, including pensions regarding how and where fraud might occur in the financial statements and any potential indicators of fraud.

As a result of these procedures, I considered the opportunities and incentives that may exist within the Independent Commission for Reconciliation and Information

Recovery for fraud and identified the greatest potential for fraud in the following areas: posting of unusual journals, complex transactions and bias in management estimates. In common with all audits under ISAs (UK), I am required to perform specific procedures to respond to the risk of management override.

I obtained an understanding of the Independent Commission for Reconciliation and Information Recovery's framework of authority and other legal and regulatory frameworks in which the Independent Commission for Reconciliation and Information Recovery operates. I focused on those laws and regulations that had a direct effect on material amounts and disclosures in the financial statements or that had a fundamental effect on the operations of the Independent Commission for Reconciliation and Information Recovery. The key laws and regulations I considered in this context included Northern Ireland Troubles (Legacy and Reconciliation) Act 2023, Managing Public Money, employment law, pensions legislation and tax legislation.

Audit response to identified risk

To respond to the identified risks resulting from the above procedures:

- I reviewed the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described above as having direct effect on the financial statements;
- I enquired of management, the Audit and Risk Committee and in-house legal counsel concerning actual and potential litigation and claims;
- I reviewed minutes of meetings of those charged with governance and the Board; and
- I addressed the risk of fraud through management override of controls by testing the appropriateness of journal entries and other adjustments; assessing whether the judgements on estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.

I communicated relevant identified laws and regulations and potential risks of fraud to all engagement team members including internal specialists and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

A further description of my responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of my certificate.

Other auditor's responsibilities

I am required to obtain sufficient appropriate audit evidence to give reasonable assurance that the expenditure and income recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

I communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control I identify during my audit.

Report

I have no observations to make on these financial statements.

Gareth Davies
Comptroller and Auditor General
09 October 2025

National Audit Office
157-197 Buckingham Palace Road
Victoria
London
SW1W 9SP

Financial statements

Statement of Comprehensive Net Expenditure for the year ended 31 March 2025

This account summarises the expenditure and income generated and consumed on an accruals basis. It also includes other comprehensive income and expenditure, which include changes to the values of non-current assets and other financial instruments that cannot yet be recognised as income or expenditure.

		For the year ended 31 March 2025	For the four months ended 31 March 2024
	Note	£000	£000
Staff costs	2	9,032	1,429
Purchase of goods and services	3	4,020	604
Depreciation and impairment charges	3	956	-
Other operating expenditure	3	934	181
Total operating expenditure		14,942	2,214
Net operating expenditure		14,942	2,214
Finance income	4	(18)	-
Finance expense	5	52	-
Net expenditure for the period		14,976	2,214
Other comprehensive net expenditure:			
Items which will not be reclassified to net operating expenditure:			
• Actuarial gain on pension scheme liabilities	14e	(235)	-
• Return on revaluation of pension scheme assets	14e	1	-
• Restriction of pension scheme surplus	14e	234	-
Total comprehensive net expenditure for the period		14,976	2,214

The notes on pages 71 to 106 form part of these accounts.

Statement of Financial Position as at 31 March 2025

This statement presents the financial position of the Commission. It comprises three main components: assets owned or controlled; liabilities owed to other bodies; and equity, the remaining value of the entity.

	Note	31 March 2025 £000	31 March 2024 £000
Non-current assets:			
Property, plant and equipment	6	4,612	351
Right of use assets	7	8,821	987
Total non-current assets		13,433	1,338
Current assets:			
Trade and other receivables	10	1,162	275
Total current assets		1,162	275
Total assets		14,595	1,613
Current liabilities:			
Trade and other payables	11	6,687	1,324
Lease liabilities	11	4,012	51
Total current liabilities		10,699	1,375
Total assets less current liabilities		3,896	238
Non-current liabilities:			
Lease liabilities	11	4,356	919
Retirement Benefit Obligation	14	-	-
Provisions	13	918	-
Total non-current liabilities		5,274	919
Total assets less total liabilities		(1,378)	(681)
Taxpayers' equity:			
General fund		(1,378)	(681)
Total equity		(1,378)	(681)

The notes on pages 71 to 106 form part of these accounts.

Louise Warde Hunter

Louise Warde Hunter

Chief Executive Officer and Commissioner, Accounting Officer

06 October 2025

Statement of Cash Flows for the period ended 31 March 2025

The Statement of Cash Flows shows the changes in cash and cash equivalents of the Commission during the reporting year. It shows how the Commission generates and uses cash and cash equivalents by classifying cash flows as operating, investing and financing activities.

	Note	For the year ended 31 March 2025 £000	For the four months ended 31 March 2024 £000
Cash flows from operating activities:			
Net operating expenditure		(14,942)	(2,214)
Adjustments for non-cash transactions			
• Depreciation	3	956	-
		956	-
Increase in trade and other receivables	10	(887)	(275)
Increase in trade and other payables	11	4,270	966
Net cash outflow from operating activities		(10,603)	(1,523)
Cash flows from investing activities:			
Purchase of non-current assets for leasehold improvements	6	(4,489)	(10)
Movement in provision for non-current asset	13	918	
Net cash outflow from investing activities		(3,571)	(1,533)
Cash flows from financing activities:			
Grants from sponsoring department		14,278	1,533
Capital element of payments in respect of leases	12	(70)	-
Finance income on pension asset	4	18	
Finance expense on lease liabilities	5	(46)	-
Finance expense on pension obligation	5	(6)	
Net financing		14,174	1,533
Net decrease in cash and cash equivalents in the period		-	-
Cash and cash equivalents at the beginning of the period		-	-
Cash and cash equivalents at the end of the period		-	-

The notes on pages 71 to 106 form part of these accounts.

Statement of changes in Taxpayers' Equity for the Year Ended 31 March 2025

	General fund £000	Taxpayers' equity £000
Balance at 1 December 2023	-	-
Net expenditure for the period	(2,214)	(2,214)
Actuarial gain on pension scheme	-	-
Return on revaluation of pension scheme assets	-	-
Restriction of pension surplus	-	-
Financing provided by sponsor department	1,534	1,534
Balance at 31 March 2024	(680)	(680)
Net expenditure for the period	(14,976)	(14,976)
Actuarial gain on pension scheme	(235)	(235)
Return on revaluation of pension scheme assets	1	1
Restriction of pension surplus	234	234
Financing provided by sponsor department	14,278	14,278
Balance at 31 March 2025	(1,378)	(1,378)

The notes on pages 71 to 106 form part of these accounts.

Notes to the accounts

1. Statement of accounting policies 2024–25

a. Basis of preparation

The financial statements have been prepared in accordance with the 2024–25 Government Financial Reporting Manual (FReM) issued by HM Treasury. The accounting policies contained in the FReM apply International Financial Reporting Standards (IFRS) as adapted or interpreted for the public sector context. Where the FReM permits a choice of accounting policy, the accounting policy which is judged to be most appropriate to the particular circumstances of the Commission for the purpose of giving a true and fair view has been selected. The particular policies adopted by the Commission are described below. They have been applied consistently in dealing with items that are considered material to the accounts.

The financial statements have been prepared in accordance with the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023.

The Accounts Direction was issued on 18 December 2024 to the Commission.

The financial statements are stated in sterling, which is the Commission's functional and presentational currency. Unless otherwise noted, the amounts shown in these financial statements are in thousands of pounds sterling (£000).

2024–25 was the first full financial year of operation by the Commission so any comparison to the previous year's figures (four-month period) needs to take this into consideration.

Going concern

The Commission prepares financial statements in accordance with the FReM, which has adapted going concern for non-trading entities to be based on the anticipated continuation of the provision of a service in the future, as evidenced by inclusion of financial provision for that service in published documents.

The Commission's sponsoring body is the NIO. The Commission's core budget for 2025–26 has been approved by the NIO, the 2025–26 budget reflects the 2025 Spending Review phase 1 settlement, and the Commission has also received a further three year financial settlement as part of the UK Government Spending Review phase 2 covering the period 2026–29. As a result of this Spending Review settlement the accounting officer has concluded that it is appropriate to prepare the financial statements on a going concern basis and does not consider there are any material uncertainties around the Commission's going concern status for a period of at least twelve months from when the financial statements are authorised for issue.

Under the FreM interpretation of IAS1, where an entity ceases to exist, it should consider whether or not its services will continue to be provided using the same assets, by another public sector entity. Following the announcement of the joint framework between the UK and Irish governments on the legacy of the Troubles, published on 19 September 2025, the expectation is that the work of the existing Commission will continue and on this basis we have concluded it is appropriate to continue to prepare these financial statements under the going concern basis.

Accounting convention

These accounts have been prepared under the historical cost convention modified to account for the revaluation of property, plant and equipment and intangible assets.

b. Financing

The Commission is resourced by funds approved by Parliament through the annual Supply process via grant in aid from its sponsor department the NIO.

c. Value Added Tax

Most of the activities of the Commission are outside the scope of VAT and, in general, output tax does not apply and input tax on purchases is not recoverable. Irrecoverable VAT is charged to the relevant expenditure category or included in the capitalised purchase cost of non-current assets. Where output tax is charged or input VAT is recoverable, the amounts are stated net of VAT.

d. Staff costs

Under IAS19 Employee Benefits, all staff costs must be recorded as an expense as soon as the organisation is obligated to pay them. This includes the costs of any untaken leave as at the year end. The cost of untaken leave has been determined using data from staff leave records.

e. Property, plant and equipment

Expenditure on property, plant and equipment of over £5,000 is capitalised.

Property, plant and equipment are stated at fair value, which is deemed to be the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

All property, plant and equipment are restated to fair value each year by reference to indices compiled by the Office for National Statistics (ONS).

Assets under construction are shown at cost and relate to assets which are incomplete but for which the Commission has incurred a liability.

In compliance with IAS16, subsequent expenditure on an asset which does not meet the criteria of enhancement or improvement is expensed through the Consolidated Statement of Comprehensive Net Expenditure.

Upward revaluations are credited to the Revaluation Reserve and permanent reductions in the value of property, plant and equipment are charged to the Statement of Comprehensive Net Expenditure. Any subsequent revaluation of assets is credited to the Statement of Comprehensive Net Expenditure to the extent that it reverses previous revaluation decreases recognised as an expense in the Statement of Comprehensive Net Expenditure.

f. Intangible assets

Expenditure on computer software licences lasting more than one year and costing more than £5,000 is capitalised and classified as intangible assets. Software licences are amortised over the shorter of the term of the licence and the useful economic life. Software licences are revalued annually using indices compiled by the ONS.

g. Depreciation

Non-current assets are depreciated at rates calculated to write them down to estimated residual value on a straight-line basis over their estimated useful lives. Depreciation is calculated from the first day of the month the asset is capitalised.

Estimated useful lives, which are reviewed regularly, are:

Asset category	Useful life
Right of use assets	The life of the lease
Leasehold improvements	The life of the lease
Assets under construction	No depreciation

h. Impairment of assets

The Commission's tangible assets are assessed annually to determine whether there is any indication that those assets have suffered an impairment loss. If any such indication exists, the recoverable amount of the asset is estimated in order to determine the extent of the impairment loss, if any.

If the recoverable amount is estimated to be less than its carrying amount, the carrying amount of the asset is reduced to its recoverable amount. An impairment loss is taken to the Statement of Comprehensive Net Expenditure, unless the impairment losses do not result from a clear consumption of economic benefit or

reduction in service potential, in which case the impairment loss should be taken to the revaluation reserve.

i. Financial instruments

IFRS9 requires an entity to recognise a financial asset or a financial liability in its Statement of Financial Position when it becomes party to the contractual provisions of the instrument.

Receivables

Receivables do not carry any interest and are recognised at fair value. No expected credit loss provision has been required as at 31 March 2025.

Cash and cash equivalents

Cash and cash equivalents comprise cash in hand and current balances with banks which are readily convertible to known amounts of cash and which are subject to insignificant risk of changes in value and have an original maturity of three months or less.

Trade and other payables

Financial liabilities within trade and other payables are recognised at fair value, which is usually the original invoiced amount.

j. Leases

Lease liability

IFRS16 (leases) introduced a single lease accounting model that requires a lessee to recognise assets and liabilities for all leases.

All lease contracts are assessed at inception to determine whether they constitute, or contain, a lease. If so, then a right-of-use asset and a corresponding lease liability are recognised, except for short-term leases (defined as leases with a lease term of 12-months or less) and leases of low value assets (defined as assets with a value less than the applicable capitalisation threshold; for these leases, the lease payments are recognised as an operating expense on a straight-line basis over the term of the lease.

Although agreements between UK Government bodies are not legally enforceable, any intra-UK Government lease agreements are treated as if they constituted a legally enforceable contract, and therefore a lease liability and a corresponding right-of-use asset are recognised.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted by using the rate implicit in the lease. If this rate cannot be readily determined, the incremental borrowing rate, as promulgated by HM Treasury, is used, in line with HM Treasury guidance issued under Public Expenditure System (PES) papers.

Where there is a rent review within the lease contract term and break clauses are not being exercised, the revised rent for the next term of the lease (for the purposes of calculating the lease liability) will be assumed to increase in line with the compounded indexation from year one of the lease term.

The lease liability is subsequently measured by increasing the carrying amount to reflect interest on the lease liability and by reducing the carrying amount to reflect the lease payments made.

The lease liability is re-measured (with a corresponding adjustment being made to the related right-of-use asset) whenever:

- The lease term has changed or there is a change in the assessment of exercise of a purchase option.
- The lease payments change due to changes in an index or rate or a change in expected payment under a guaranteed residual value.
- A lease contract is modified and the lease modification is not accounted for as a separate lease.

Right of use asset

Right-of-use assets are initially measured at the value of the corresponding lease liability, plus lease payments made at or before the commencement day and any initial direct costs. They are subsequently measured at cost (as a proxy for fair value) less accumulated depreciation and impairment losses. The Commission will not enter into any long-term leases, defined as leases with a term of 25-years or more.

The cost is deemed an appropriate proxy for fair value as right of use assets generally have shorter useful lives and values than their respective underlying assets.

Right-of-use assets are depreciated over the shorter period of lease term and useful life of the underlying asset. If a lease transfers ownership of the underlying asset or the cost of the right-of-use asset reflects the expectation that a purchase option will be exercised, the related right-of-use asset is depreciated over the useful life of the underlying asset. The depreciation starts at the commencement date of the lease.

Dilapidations

Dilapidations costs in respect of leases, are an estimate of the expenditure required to return vacated leased buildings to the original condition at the date of commencement of the lease.

The dilapidations estimate is calculated through one of two options:

- Fit-out works are materially complete at year end—the Commission will engage a third-party expert to conduct a survey and produce a report estimating the future dilapidations costs.
- Fit-out works are ongoing at year end—a dilapidations estimate is obtained from the property landlord and pro-rated against the square meterage of the leased space, or the cost estimate per square foot will be taken from the most recent dilapidations valuation report and applied to the square meterage in the building that still has fit-out works to complete, to estimate the future expenditure to return that space to its original condition.

k. Employee benefits

From 1 April 2024, the Commission employees became members of the Local Government Pension Scheme (Northern Ireland) (NILGOSC), a funded defined benefit pension scheme providing pension benefits for employees of Northern Ireland local authorities and other admitted bodies.

All Commission employees were admitted to the NILGOSC scheme upon commencement of employment. Employees who joined the Commission prior to 1 April 2024 were admitted to the NILGOSC scheme on 1 April 2024 and had their entitlement backdated to the date they joined the Commission.

In accordance with IAS19 (Employee Benefits) the scheme managers/trustees are required to undertake a sensitivity analysis for each significant actuarial assumption as at the end of the reporting period, showing how the defined benefit obligation would have been affected by changes in the relevant actuarial assumptions that were reasonably possible at that date. This analysis, including details of the methods and assumptions used in preparing the sensitivity analysis, are set out in note 14 to the Accounts.

The pension costs are assessed in accordance with the advice of independent qualified actuaries using the market-led approach. The latest actuarial valuation of the scheme was at 31 March 2022.

Pension scheme assets are measured using market value. Pension scheme liabilities are measured using the projected unit method and discounted at the current rate of return on a high-quality corporate bond of equivalent term to the

liability. Pension scheme assets are only recognised on the Statement of Financial Position if there are expected future economic benefits to the Commission.

The increase in the present value of the liabilities of the Commission's defined benefit pension scheme arising from employee service in the period is charged to the Statement of Comprehensive Net Expenditure so as to recognise the cost of pensions over the employees' working lives.

Actuarial gains and losses are recognised in Other Comprehensive Net Expenditure.

Paragraph 64 of IAS19 states that "when an entity has a surplus in a defined benefit plan, it shall measure the net defined benefit asset at the lower of: (a) the surplus in the defined benefit plan and (b) the asset ceiling, determined using the discount rate". The asset ceiling is the "present value of any economic benefits available in the form of refunds from the plan or reductions in future contributions to the plan".

Staff who are on loan to the Commission from other entities will continue in the pension schemes of their parent entity, the cost of which is recharged to the Commission as part of staff costs.

Further details regarding the above schemes are contained in the remuneration and staff report.

I. Provisions

The Commission provides for legal or constructive obligations which are of uncertain timing or amount at the reporting date on the basis of the best estimate of the expenditure required to settle the obligation.

The Commission also provides for estimated costs of future repairs and/or obligations to restore a property to its original condition at the end of the lease.

For any provisions extending beyond one year the provision is discounted using the nominal discount rate as quoted in the HM Treasury guidance issued under Public Expenditure System (PES) papers under Discount Rates for General Provisions, Post Employment Benefits, Financial Instruments and Leases (under IFRS16): Announcement of Rates.

m. Contingent liabilities

Contingent liabilities are disclosed in the notes to the financial statements in accordance with IAS37 Provisions, Contingent Liabilities and Contingent Assets. Where the time value of money is material, contingent liabilities which are required to be disclosed under IAS37 are stated at discounted amounts and the amount reported to Parliament separately noted.

Remote contingent liabilities outside the scope of IAS37 but requiring Parliamentary reporting in accordance with the requirements of Managing Public Money are disclosed in the Parliamentary Accountability and Audit section of the Accountability Report.

n. Analysis of net expenditure by segment

In line with the provisions of IFRS8, Operating Segments, the Commission does not normally analyse its net expenditure by operating segments and no such disclosure is required.

o. Critical accounting estimates and key judgements

The preparation of financial statements in conformity with IFRS requires the use of accounting estimates and assumptions. It also requires management to exercise its judgement in the process of applying the Commission's accounting policies. The Commission continually evaluates the estimates, assumptions and judgements based on available information and experience. As the use of estimates is inherent in financial reporting, actual results could differ from these estimates. The estimates and assumptions which have the most significant risk of causing a material adjustment to the carrying amounts of assets and liabilities are discussed below:

Leases

Each of the property leases the Commission has entered into have a break clause at 5 years. Management have considered the likelihood of the Commission exercising the right to break the lease at year 5 as unlikely, as it is the intention to operate out of these locations for at least 10 years. The lease liability has therefore been calculated over a 10-year lease period.

The Commission's London base was originally negotiated as a short-term lease while negotiations for a longer-term lease were progressing. At the year end, this lease was still in negotiation but has been recognised in the accounts as a Right of Use asset as the lease contracts are intended to be signed post year end. Substantial fit-out works have been carried out further evidencing the commitment to a long-term lease.

Dilapidations estimate

A dilapidations provision was not available from the landlord for the Commission's London location. As per the Commission's policy a dilapidations report for one of our other properties was used to estimate the cost per square metre. A sensitivity analysis showing the impact on the provision estimate of a +/- £150 per square metre movement in cost is included in note 13.

The dilapidations report provided by the external surveyor provided a range of dilapidation liability estimates. The Commission has used the higher end of the value range in calculating the dilapidations provision, as it is believed to be the most realistic outcome, based on our experience of working with the prescribed contractors on the fit-out works. This is in accordance with accounting standard IAS37.

Post retirement benefits

The Commission accounts for pensions and other post-retirement benefits in line with IAS19. In determining the pension cost and the defined benefit obligation of the pension scheme, a number of assumptions are used by the Actuary. These include the discount rate, salary growth, price inflation, the expected return on the schemes investments and mortality rates. Further details are contained in the staff report and note 14.

p. Accounting standards, interpretations and amendments to published standards not yet effective

The following standards or interpretations have been issued by the International Accounting Standards Board but have not been adopted:

IFRS 17—Insurance contracts replaces IFRS4. The Commission does not issue insurance policies, no material impact is expected on the financial statements as a result of this standard.

IFRS 18—Presentation and Disclosure in Financial Statements was issued in April 2024, replacing IAS 1 (Presentation of Financial Statements), and is effective for accounting periods beginning on or after 1 January 2027. IFRS 18 will be implemented, as interpreted and adapted for the public sector if required, from a future date (not before 2027-28) that will be determined by the UK Financial Reporting Advisory Board in conjunction with HM Treasury following analysis of this new standard. Management currently assesses that there will be minimal impact on application to the Commission's financial statements.

IFRS 19—Subsidiaries without Public Accountability. Due to the nature of public sector reporting, we do not anticipate that there will be a significant impact from IFRS 19 on the Commission's financial statements on introduction.

Non-investment asset valuations

In December 2023 HM Treasury released an exposure draft on potential changes to valuing and accounting for non-investment assets (e.g. PPE, intangible assets). The following changes to the valuation and accounting of

non-investment assets is to be included in the 2025–26 FReM for mandatory implementation:

References to assets being held for their 'service potential' and the terms 'specialised / non-specialised' assets are being removed from the FReM. Non-investment assets are instead described as assets held for their 'operational capacity'. This change has no impact on the valuation basis of non-investment assets, which remains Existing Value Use (EVU).

An adaption to IAS 16 will be introduced to withdraw the requirement to revalue an asset where its fair value materially differs from its carrying value. Assets are now valued using one of the following processes:

- A quinquennial revaluation supplemented by annual indexation.
- A rolling programme of valuations over a five-year cycle, with annual indexation applied to assets during the four intervening years.
- For non-property assets only, appropriate indices.

In rare circumstances where an index is not available, a quinquennial revaluation supplemented by a desktop revaluation in year 3.

The option to measure intangible assets using the revaluation model is withdrawn. The carrying values of intangible assets at 31 March 2025 will be considered the historical cost at 1 April 2025.

Social benefits

The 2025–26 FReM will include new guidance on accounting for social benefits. The 2025–26 FReM will define social benefits as 'current transfers received by households (including individuals) intended to provide for the needs that arise from certain events or circumstances, for example, sickness, unemployment, retirement, housing, education, or family circumstances.

No material impact is expected on the financial statement of the Commission as a result of these changes.

2. Staff costs

More detail on staff numbers can be found in the remuneration and staff report.

	For the year ended 31 March 2025 £000	For the period ended 31 March 2024 £000
Wages and salaries	7,455	1,130
Social security costs	653	117
Other pension costs	924	182
Total staff costs	9,032	1,429

3. Other expenditure

	For the year ended 31 March 2025 £000	For the period ended 31 March 2024 £000
Purchase of goods and services:		
Professional fees	979	297
Consultancy	972	204
Maintenance and utilities	964	102
IT expenditure	513	17
Legal costs	386	-
Communications, office supplies and services	104	-
Advertising	81	11
Insurance	21	1
	4,020	632
Non-cash items:		
PPE depreciation (note 6)	450	-
ROU asset depreciation (note 7)	506	-
	956	-
Other expenditure:		
Audit fee	160	65
Travel and subsistence	448	57
Events and conferences	134	27
Training costs	125	-
All other expenditure	67	4
	934	153
Total other expenditure	5,910	785

During the year the Commission did not purchase any non-audit services from its auditor, the National Audit Office. The audit fee of £160k above includes £20k additional costs incurred on the 2023–24 and £140k for the 2024–25 audit.

4. Finance income

The Commission does not generate income from its operating activities however has recognised finance income from the assets in the defined benefit pension scheme.

	For the year ended 31 March 2025 £000	For the period ended 31 March 2024 £000
Interest on pension scheme assets		-
Total income	18	-

5. Finance expense

	For the year ended 31 March 2025 £000	For the period ended 31 March 2024 £000
Interest on pension obligation	6	-
Finance lease interest	46	-
Total finance expense	52	-

6. Property, plant and equipment

	Leasehold improvements	Total
Cost or valuation	£000	£000
At 1 December 2023	-	-
Additions	351	351
At 31 March 2024	351	351
Additions	4,711	4,711
At 31 March 2025	5,062	5,062
Depreciation:		
At 1 December 2023	-	-
Charged in year	-	-
At 1 April 2024	-	-
Charged in year	450	450
At 31 March 2025	450	450
Carrying amount		
At 31 March 2025	4,612	4,612
At 31 March 2024	351	351

As the property plant and equipment assets of the Commission only came into full operation at the end of the financial year, no indexation has been applied on 2024–25.

7. Right of use leased assets

Cost or valuation	Leasehold	Total
	£000	£000
At 1 December 2023	-	-
Additions	987	987
At 31 March 2024	987	987
Additions	8,340	8,340
At 31 March 2025	9,327	9,327
Depreciation		
At 1 December 2023	-	-
Charged in year	-	-
At 31 March 2024	-	-
Charged in year	506	506
At 31 March 2025	506	506
Carrying amount		
At 31 March 2025	8,821	8,821
At 31 March 2024	987	987

8. Financial instruments

As the cash requirements of the Commission are met through the Estimates process, financial instruments play a more limited role in creating and managing risk than would apply to a non-public sector body of a similar size. The majority of financial instruments relate to contracts for non-financial items in line with the Commission's expected purchase and usage requirements and the department is therefore exposed to little credit, liquidity or market risk.

9. Cash and cash equivalents

The following balances were held at commercial banks and cash in hand.

	2024–25	2023–24
	£000	£000
Balance at 1 April	-	-
Net change in cash and cash equivalent balances	-	-
Balance at 31 March	-	-

Grant in aid is provided as cash is required, as a result the Commission did not hold a cash balance at 31 March 2025.

10. Trade receivables, financial and other assets

	2024–25	2023–24
	£000	£000
Amounts falling due within one year		
VAT receivables	663	66
Prepayments	497	173
Other debtors	2	36
Total	1,162	275

11. Trade payables and other current liabilities

	2024–25	2023–24
	£000	£000
Amounts falling due within one year:		
Accruals and deferred income	6,096	966
Capital accruals	579	358
Other payables*	12	-
Current element of lease liabilities	4,012	51
	10,699	1,375
Amounts falling due after one year:		
Leases	4,356	919
Total	15,055	2,294

*Other payables is a credit balance in the cash clearing account and reflects supplier invoices cleared for payment at 31 March, yet to clear the bank account.

12. Leases

Lease liabilities	Leasehold	Total
	£000	£000
At 1 April 2024	970	970
Additions	7,422	7,422
Interest on lease liabilities	46	46
Cash payment	(70)	(70)
At 31 March 2025	8,368	8,368

Total future lease payments under leases are given in the table below for each of the following periods:

	2024–25	2023–24
	£000	£000
No later than one year	4,012*	51
Later than one year and not later than five years	1,614	475
Later than five years	2,742	444
Balance at 31 March	8,368	970

*Of this total, £3.5m relates to the payment of the capital costs which are deemed to be the lease consideration for the Belfast operational office. This amount consists of two invoices both of which were paid in April 2025.

In addition to the lease for the operational office in Belfast, we have also accounted for the lease of our London office. The Belfast Headquarters lease was initially recognised in the 2023–24 Annual Report and Accounts.

13. Provisions

A dilapidation survey was conducted on the Belfast office in June 2025. The results of this survey were used to estimate the provision for dilapidations on the Belfast office as well as calculate the provision for the London office, based on the cost per square metre and applied to the works carried out. Once the London works are complete, a survey will be commissioned to estimate the dilapidation costs for this space on the completed works and the provision updated accordingly.

The amount included below represents the best estimate of the expenditure required to settle the obligation at the date of approval of the financial statements.

	Dilapidations	Total
	£000	£000
Balance at 1 April 2024	-	-
Provided in the year	918	918
Balance at 31 March 2025	918	918

Analysis of expected timing of cashflows:

	Dilapidations	Total
	£000	£000
Not later than one year	-	-
Later than one year and not later than 5 years	-	-
Later than 5 years	918	918
Balance at 31 March 2025	918	918

Sensitivity analysis

The dilapidations provision is sensitive to the cost per square metre assumptions used. The approximate impact of changing this key assumption for each of our locations is set out below. In each case, only the assumption mentioned is altered, all other assumptions remain the same.

Cost per square metre assumption (£/sqm)

Adjustment to £/sqm	+£150/sqm	Base figure £000	-£150/sqm
Belfast (£000)	501	419	338
	19.44%		(19.44%)
London (£000)	592	499	406
	18.57%		(18.57%)

14. Retirement benefit obligation

	2024–25	2023–24
	£000	£000
Pension asset/liability	-	-

The disclosures below relate to the funded liabilities within the Northern Ireland Local Government Officers' Superannuation Pension Fund (the Fund) which is part of the Local Government Pension Scheme (Northern Ireland) (the LGPS).

The LGPS is a funded defined benefit plan with benefits earned up to 31 March 2015 being linked to final salary. Benefits after 31 March 2015 are based on a Career Average Revalued Earnings scheme. Details of the benefits earned over the period covered by this disclosure are set out in The Local Government Pension Scheme Regulations (Northern Ireland) 2014 (as amended) and The Local Government Pension Scheme (Amendment and Transitional Provisions) Regulations (Northern Ireland) 2014 (as amended).

Funding/governance arrangements

The funded nature of the LGPS requires the Commission and its employees to pay contributions into the Fund, calculated at a level intended to balance the pension liabilities with investment assets. For 2024–25 the contribution rates were 14.7% employers' and ranging between 5.5% and 10.5% employees'.

The last actuarial valuation was at 31 March 2022 and the contributions to be paid until 31 March 2025 resulting from that valuation are set out in the Fund's Rates and Adjustment Certificate.

The Northern Ireland Local Government Officers' Superannuation Committee is responsible for the governance of the Fund.

Assets

The assets allocated to the Employer in the Fund are notional and are assumed to be invested in line with the investments of the Fund for the purposes of calculating the return over the accounting period. The Fund holds a significant proportion of its assets in liquid investments. As a consequence, there will be no significant restriction on realising assets if a large payment is required to be paid from the Fund in relation to an employer's liabilities. The assets are invested in a diversified spread of investments and the approximate split of assets for the Fund as a whole (based on data supplied by the Committee) is shown in the disclosures. The Committee may invest a small proportion of the Fund's investments in the assets of some of the

employers participating in the Fund if it forms part of their balanced investment strategy.

Risks

Asset volatility

The liabilities used for accounting purposes are calculated using a discount rate set with reference to corporate bond yields at the accounting date. If assets underperform this yield this will create a deficit in the accounts. The Fund holds a significant proportion of growth assets which, while expected to outperform corporate bonds in the long term, creates volatility and risk in the short term in relation to the accounting figures.

Changes in bond yield

A decrease in corporate bond yields will increase the value placed on the liabilities for accounting purposes although this will be marginally offset by the increase in the assets as a result (to the extent the Fund invests in corporate bonds).

Inflation risk

The majority of the pension liabilities are linked to either pay or price inflation. Higher inflation expectations will lead to a higher liability value. The assets are not perfectly correlated with inflation meaning that an increase in inflation will increase the deficit.

Life expectancy

The majority of the Fund's obligations are to provide benefits for the life of the member following retirement, so increases in life expectancy will result in an increase in the liabilities.

Exiting employers

Employers which leave the Fund (or their guarantor) may have to make an exit payment to meet any shortfall in assets against their pension liabilities. If the Employer (or guarantor) is not able to meet this exit payment the liability may in certain circumstances fall on other employers in the Fund. Further, the assets at exit in respect of 'orphan liabilities' may, in retrospect, not be sufficient to meet the liabilities. This risk may fall on other employers. Orphan liabilities are currently a small proportion of the overall liabilities in the Fund.

The principal assumptions used by the actuary in updating the latest valuation of the Fund for IAS19 purposes were:

a) Principal Financial Assumptions (% per annum)

2024-25	
Duration of liabilities (years)	21.1
%PA	
Discount rate	5.80
CPI Price Inflation (pension increase)	2.50
Salary increases	3.00

b) Mortality assumptions

The mortality assumptions are based on actual mortality experience of members within the Fund based on analysis carried out as part of the 2022 Actuarial Valuation and allow for expected future mortality improvements. Sample life expectancies at age 65 resulting from these mortality assumptions are shown below.

2024-25	
Males:	
Pensioner member aged 65 at accounting date	21.6
Active member aged 45 at accounting date	22.2
Females:	
Pensioner member aged 65 at accounting date	24.5
Active member aged 45 at accounting date	25.2

c) Asset allocation

The approximate split of assets for the Fund as a whole is shown in the table below.

	Asset split		
	At 31 March 2025 (%)		
	Quoted	Unquoted	Total
Equities	40.2	0.0	40.2
Property	0.0	10.0	10.0
Government	15.4	0.0	15.4
Corporate bonds	3.6	0.0	3.6
Multi asset credit	13.4	0.0	13.4
Cash	11.4	0.0	11.4
Other	0.1	5.9	6.0
Total	84.1	15.9	100.0

d) Reconciliation of funded status to Statement of Financial Position (SoFP)

	31 March 2025
	£000
Fair value of assets	766
Present value of funded defined benefit obligation	(532)
Funded status	234
Unrecognised asset	(234)
Asset/(liability) recognised on the SoFP	-

This table shows the funded status as a £234k surplus. IFRIC 14 The Limit on a Defined Benefit Asset, Minimum Funding Requirements and their Interaction provides guidance on the recognition of the surplus through both reduced contributions and through refunds from the plan.

The actuary, AON, have completed the calculation of the potential surplus that could be recovered through reduced contributions in the future, determining an asset ceiling of £0.

Additionally, refunds are only possible when an employer exits the fund and will depend on the exit terms in force at the date of exit. Given the uncertainty of when the Commission may exit the fund and the conditions and terms prevalent at that point being unknown, the likelihood and value of any refund is also unknown.

The surplus has therefore not been recognised in the Statement of Financial Position at 31 March 2025.

The split of the liabilities at the last valuation date between the various categories of members was as follows:

Member category	%
Active members	100
Deferred pensioners	0
Pensioners	0

e) Breakdown of amounts recognised in statement of comprehensive net expenditure (SoCNE) and other comprehensive expenditure (OCE)

Amount charged to net expenditure account	31 March 2025
	£000
Operating cost:	
Current service cost*	518
Past service cost (including curtailments)	-
Settlement cost	-
Financing cost:	
Interest on net defined benefit asset	(12)
Interest on unrecognised asset	-
Total pension expense recognised in the SoCNE	506
Re-measurements in other comprehensive expenditure:	
Return on plan assets below that recognised in net interest	1
Actuarial gains due to change in financial assumptions	(227)
Actuarial gains due to change in demographic assumptions	(6)
Actuarial gains due to liability experience	(2)
Adjustment loss in respect of unrecognised asset	234
Total amount recognised in other comprehensive expenditure	-
Total amount recognised	506

*The current service cost includes an allowance for the administration expenses of £0.017m.

f) Changes to present value of defined benefit obligation during the accounting period

	31 March 2025
	£000
Opening defined benefit obligation	-
Current service cost	518
Interest expense on defined benefit obligation	6
Contributions by participants	261
Actuarial gains due to changes in financial assumptions	(227)
Actuarial gains due to changes in demographic assumptions	(6)
Actuarial gains due to liability experience	(2)
Net benefits paid out	(18)
Past service costs (including curtailments)	-
Net increase in liabilities from disposals/acquisitions	-
Settlements	-
Closing defined benefit obligation	532

g) Changes to the fair value of assets during the accounting period

	31 March 2025
	£000
Opening fair value of assets	-
Interest income on assets	18
Re-measurement losses on assets	(1)
Contributions by the employer	506
Contributions by participants	261
Net benefits paid out	(18)
Net increase in liabilities from disposals/acquisitions	-
Settlements	-
Closing fair value of assets	766

h) Actual return on assets

	31 March 2025
	£000
Interest income on assets	18
Re-measurement loss on assets	(1)
Actual return on assets	17

i) Sensitivity analysis

The results shown above are sensitive to the assumptions used. The approximate impact of changing the key assumptions on the present value of the funded defined benefit obligation as at 31 March 2025 and the projected services cost for the year ending 31 March 2026 are set out below. In each case, only the assumption mentioned is altered, all other assumptions remain the same and are summarised in the notes above. Sensitivity of unfunded benefits (where applicable) are not included on materiality grounds.

Discount rate assumption

Adjustment to discount rate	+0.1 p.a.	Base Figure	-0.1 p.a.
Present value of total obligation (£000)	521	532	543
% change in present value of total obligation	(2.1%)	-	2.1%
Projected service cost (£000)	283	300	318
Approximate % change in projected service cost	(5.8%)	-	(6.0%)

Rates of general increase in salaries

Adjustment to salary increase rate	+0.1 p.a.	Base Figure	-0.1 p.a.
Present value of total obligation (£000)	532	532	532
% change in present value of total obligation	0.0%	-	0.0%
Projected service cost (£000)	300	300	300
Approximate % change in projected service cost	0.0%	-	0.0%

Rate of increase to pensions and rate of revaluation of pension accounts

Adjustment to pension increase rate	+0.1 p.a.	Base Figure	-0.1 p.a.
Present value of total obligation (£000)	543	532	521
% change in present value of total obligation	2.1%	-	(2.1%)
Projected service cost (£000)	318	300	283
Approximate % change in projected service cost	6.0%	-	(5.8%)

Post retirement mortality assumption*

Adjustment to mortality assumption	-1 year	Base Figure	+1 year
Present value of total obligation (£000)	544	532	520
% change in present value of total obligation	2.3%	-	(2.3%)
Projected service cost (£000)	312	300	287
Approximate % change in projected service cost	3.9%	-	(4.6%)

*A rating of +1 year means that members are assured to follow the monthly pattern of the base table for an individual that is one year.

j) Estimated profit and loss/surplus or deficit in future periods

The figures below are provided based on the assumption as at 31 March 2025 outlined above.

Funded LGPS benefits—expected amounts charged to SoCNE	31 March 2026 £000
Current service cost*	300
Interest on the net defined benefit asset	(15)
Total	285

*Projected service cost includes allowance for administration expenses of £0.018m and estimated payroll costs of £3.564m in the period ending 31 March 2025.

The pension cost shown in next year's accounts might be different to that shown above for the following reasons:

- Actual payroll may be different to that used in the calculations. The difference in payroll will particularly affect the current service cost.
- Past service costs may not be zero (this cost is that resulting from benefit augmentations or unreduced early retirement of individual members before age 60 or on the grounds of efficiency).
- Curtailment/settlement events may occur.
- Actual cash-flows over the next year may differ from those assumed.

k) Funded benefits

The following data has been used in evaluating the figures noted above:

Active members as at 31 March 2024	Number	Total pay £000	
Total	1	30	
Funded cash-flow data provided	Months provided	Amount provided £000	Amount used £000
Employer—normal contributions	11	464	
Employer—additional capital contributions			
Employer—early retirement strain on fund payments	11		
Total contributions by the employer			506
Employee—normal contributions	11	239	
Employee—added years contributions	11		
Total contributions by participants			261
Transfers in			
Other income			
Transfers out			
Retirement lump sums			
Other outgoings			
Death in service lump sums*			
Benefits paid (i.e.) pension paid			
Net benefits paid out **			18

* Calculated over the year to be £0.005m.

** Figure includes an allowance for expenses of £0.017m.

I) Fund return

The Fund is not formally unitised for the purpose of allocating assets between employers on a monthly basis. Assets have therefore been calculated for this report using the roll-forward method as set out in the Covering Report for non-unitised funds.

The gross Fund return has been calculated using the method set out in the covering report.

An allowance has been made for investment management expenses by reducing the provided fund returns by 0.3% p.a. based on the Fund's experience.

The overall Fund return over the accounting period has been calculated as 4.4%.

Known Fund returns have been used for the period ending 31 March 2025.

15. Contingent liabilities disclosed under IAS37

At the time of publishing these accounts, the Commission has one pending employment claim. It is not currently possible to accurately estimate the value of the claim as the Commission is in the early stages of performing its due diligence on its validity.

16. Commitments

The Commission has no capital commitments at 31 March 2025 (2023–2024 nil).

17. Related-party transactions

The ICRIR is an Arm's Length Non-Departmental Public Body of the NIO. During the year, the Commission had various transactions with the NIO, associated with the receipt of grant-in-aid, the reimbursement of payroll costs and costs incurred by NIO on our behalf in relation to the initial set up of the Commission.

No Board members, key managerial staff or other related parties have undertaken any other material transactions with the NIO during the period. The remuneration report sets out amounts paid to management.

18. Events after the reporting period date

In accordance with IAS10, events after the reporting period are considered up to the date at which the accounts are authorised for issue. This is interpreted as being the date of the certificate and report of the Comptroller and Auditor General to the Houses of Parliament.

On 19 September 2025, Hilary Benn, the Secretary of State for Northern Ireland, on behalf of the UK Government, and Simon Harris, the Tánaiste, the Deputy Prime Minister for Ireland, announced proposed reforms to the Act under a joint framework. The framework included plans for a new Legacy Commission to replace the ICRIIR and changes to be made to its structure and governance.

The proposed changes will need to progress through the relevant legislative process before any financial impact can be assessed. Until that point, there will be no pause in the Commission's vital work, with our doors remaining open for all new Requesting Individuals.

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