

ANNUAL REPORT AND ACCOUNTS 2024-25

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INDEPENDENT REPORTING COMMISSION ANNUAL REPORT AND ACCOUNTS 2024-25

(For the period ended 31 March 2025)

Presented to Parliament pursuant to Regulation 3(2) of the Northern Ireland (Stormont Agreement and Implementation Plan) Act 2016 (Independent Reporting Commission) Regulations 2016

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Performance Report

Overview

Forward by the Accounting Officer

The Independent Reporting Commission (IRC) reports on progress towards ending continuing paramilitary activity connected with Northern Ireland and the implementation of measures to support that goal and consults to inform its analysis and recommendations. It meets a broad range of individuals and organisations with expertise and experience to enable it to publish an informed Report about progress made towards ending paramilitarism once and for all. The Commission engages widely in order to encourage progress and action in this vital area, and to promote its recommendations.

The Annual Report and Accounts focuses on the way in which the IRC carried out its functions during the previous financial year. It sets out performance against business objectives and provides details of expenditure¹, including the report of an external audit carried out by the Comptroller and Auditor General (partnered in delivery by Ernst & Young LLP)².

The Commission continued to engage, consult, report and make recommendations connected to its mandate in the financial year 2024-25, and met a wide range of agencies, departments, organisations and individuals that continue to work to bring about an end to paramilitary activity connected with Northern Ireland.

The IRC published its Seventh Report on progress towards ending paramilitary activity in February 2025³. While our remit is to report annually to the two governments and the Executive on progress towards ending paramilitary activity, the publication of our Report was delayed so that it could be submitted to both the UK and Irish Governments at the same time, so consequently the report issued in February 2025. That Report provided the Commission's latest analysis and made three key recommendations, which are recapped in the Performance Report on pages 25 and 26.

¹ By the Commission's UK Secretariat.

Under the provisions of Article 10 of the International Treaty ("the Treaty") establishing the Independent Reporting Commission ("the Commission"), the Government of the United Kingdom (UK) has requested the appointment of auditors to audit the accounts of the Commission in respect of the monies provided by the UK Government.

³ Independent Reporting Commission Seventh Report PDF (opens in a new window)

An assessment of the Commission's corporate performance during the year is set out on pages 16 to 28 of this report. In summary, the Commission performed effectively against its business objectives during the year and met its statutory and business objectives in full.

The Commission will continue to play its part in supporting the ending of paramilitary activity connected with Northern Ireland in the year ahead.

Niamh Ó Maolain

UK Joint Secretary & Accounting Officer

24 June 2025

Purpose of the Independent Reporting Commission

The Fresh Start Agreement recognised the need for a body to report on progress towards ending continuing paramilitary activity connected with Northern Ireland⁴. This reporting body was subsequently established by International Treaty⁵ ("the Treaty") and corresponding legislation in the UK and Ireland in 2017, named the Independent Reporting Commission ("the Commission"), and independent Commissioners were nominated by the NI Executive, and UK and Irish Governments⁶.

The IRC's core objective is to promote progress towards ending paramilitary activity connected with Northern Ireland. It exercises its functions with a view to supporting long-term peace and stability in society, and stable and inclusive devolved Government in Northern Ireland. We do our work by engaging and consulting, reporting and recommending.



⁴ A Fresh Start: The Stormont Agreement and Implementation Plan PDF (opens in a new window)

The international Treaty establishing the body was signed in September 2016 and came into force on 8 August 2017 following completion of the relevant legislative processes in the UK and Ireland. The Commission was fully established from that date, having operated in shadow form in the preceding period from January 2017.

The Commission's founding legislation is: in the UK, the Northern Ireland (Stormont Agreement and Implementation Plan) Act 2016, the Northern Ireland (Stormont Agreement and Implementation Plan) Act 2016 (Independent Reporting Commission) Regulations 2016 and the Northern Ireland (Stormont Agreement and Implementation Plan) Act (Immunities and Privileges) Regulations 2016; and, in Ireland, the Independent Reporting Commission Act 2017.

The Fresh Start Agreement⁷ was reached between the Northern Ireland Executive ("the Executive"), the UK Government and the Irish Government in 2015 following ten weeks of intensive talks convened to address the legacy and impact of paramilitary activity, and the implementation of the Stormont House Agreement. In that political Agreement, all the parties committed to:

Extract from the Fresh Start Agreement

- work collectively to achieve a society free of paramilitarism;
- support the rule of law unequivocally in word and deed and support all efforts to uphold it;
- challenge all paramilitary activity and associated criminality;
- call for, and work together to achieve, the disbandment of all paramilitary organisations and their structures;
- challenge paramilitary attempts to control communities;
- support those who are determined to make the transition away from paramilitarism; and
- accept no authority, direction or control on our political activities other than our democratic mandate alongside our own personal and party judgment.

The Treaty establishing the IRC sets out what we should Report on:

Summary of relevant parts of the Treaty establishing the IRC

The Commission reports annually on:

- (a) progress towards ending continuing paramilitary activity connected with Northern Ireland: and
- (b) implementation of the relevant measures of the Government of Ireland, the Government of the United Kingdom, and the Northern Ireland Executive, including the Executive's Strategy, to inform the implementation of that Strategy.

⁷ A Fresh Start: The Stormont Agreement and Implementation Plan PDF (692 KB) (opens in a new window)

The Commission primarily reports on work being led by the Northern Ireland Executive, through the Executive Programme on Paramilitarism and Organised Crime, whose aim is to achieve "safer communities, resilient to paramilitarism, criminality and coercive control"⁸.

Through its engagement, information received and analysis undertaken, the Commission is able to report annually on the implementation of the Programme and on progress towards ending paramilitary activity connected with Northern Ireland.

Composition and support

The Commission is made up of four Commissioners, with different experiences and expertise relevant to the broad approach required to tackle paramilitarism: policing and criminal justice responses alongside measures to tackle the deep, socio-economic issues in the communities most affected by paramilitarism. The Northern Ireland Executive nominated two Commissioners, and the UK and Irish Governments nominated one Commissioner each to the IRC. These four Commissioners are appointed until 30 September 2026⁹. They work together collectively to further the Commission's core objective. The Commission was established under international Treaty and so will continue to exist as a body until the Treaty obligations are terminated by mutual agreement between the UK Government and the Irish Government.

The current Commissioners are:

^{8 &}lt;u>https://www.northernireland.gov.uk/articles/executive-programme-tackling-paramilitary-activity-and-organised-crime-0</u>

Ommissioners McBurney, McWilliams and Reiss were initially appointed from 8 April 2017 to 7 August 2021. Commissioner O'Connor was appointed until September 2021. All four Commissioners had their tenures extended until end-March 2022 in July 2021, to enable them to publish a Fourth Report and to engage following its publication, and in March 2022 all four Commissioners were reappointed for a further three years from 1 April 2022. In March 2025 all four Commissioners appointments were extended until 30 September 2026.
UK Government announcement of appointments to Independent Reporting Commission (opens in a new window)



John McBurney

John McBurney is an experienced solicitor practising in Northern Ireland. He qualified in 1979 and has significant experience in major litigation, commercial transactions, conveyancing and estate management. He has supported victims and survivors of the Troubles in his legal work. John was one of three persons tasked by the First and deputy First Ministers in December 2015 to make recommendations for a strategy to disband paramilitary groups and was subsequently nominated to the Commission by the Executive to report on progress towards that goal. In March 2023, John was appointed an independent member of a DUP-appointed consultation group/panel to report on views about the Windsor Framework.

Monica McWilliams

Monica McWilliams is an academic and former politician. She is a graduate of Queen's University Belfast and the University of Michigan, and was Professor of Women's Studies and Social Policy at Ulster University where she holds the position of Emeritus Professor. She co-founded the Northern Ireland Women's Coalition and led its negotiating team in the multi-party talks leading up to the Good Friday Agreement. She was elected to the legislative Assembly in Northern Ireland from 1998 – 2003. She was Chief Commissioner of the Northern Ireland Human Rights Commission from 2005 – 2011 and is a former Chairperson of Interpeace. Monica was one of three persons tasked by the First and Deputy First Ministers in December 2015 to make recommendations for a strategy to disband paramilitary groups and was subsequently nominated to the Commission by the Executive to report on progress towards that goal. Monica works with a number of charities: she is a Trustee for the David Ervine Foundation (for disadvantaged children) and the John and Pat Hume Foundation (to

support and inspire leadership for peaceful change), and is patron of WAVE Trauma Centre (for people affected by the Troubles/conflict) and Politics in Action. Monica also sits on the Governance Board of Operation Kenova. She published a book entitled Stand Up, Speak Out: My Life Working for Women's Rights, Peace and Equality in Northern Ireland and Beyond, and she contributes to capacity building work with women in a range of countries. She continues to engage in events, and working groups, at home and abroad on matters relating to equality and rights, legacy, the future of Northern Ireland and to support peace and reconciliation. Monica was nominated to the Commission by the Executive.

Tim O'Connor

Tim O'Connor is a native of Kilkeedy in West Limerick. After a two-year stint as a teacher he joined the Civil Service in Dublin in 1974, moving to the Department of Foreign Affairs in 1979. Most of his time there was spent working on the Northern Ireland Peace Process and he was part of the Irish Government Negotiating Team for the Good Friday/Belfast Agreement. He was the inaugural Southern Joint Secretary of the North/South Ministerial Council, based in Armagh, from 1999 to 2005. He has also served terms as Director of the Africa Unit and of the Human Rights Unit in the Department of Foreign Affairs. His foreign postings included the Embassies of Ireland in Bonn and Washington DC, and from 2005-2007 he served as the Consul General of Ireland in New York, USA. Tim served as Secretary General to President Mary McAleese at Áras an Uachtaráin from 2007 to 2010. Since retiring from the Civil Service in 2010 he has been dividing his time between his own advisory business and voluntary work, both in the public sector and with NGOs. In 2020, he chaired the Implementation Advisory Group for the directly elected mayor with executive functions for Limerick City and County. From February 2019 to February 2021, Tim was Chairman of the Golf Ireland Transition Board. He is a member of the Board of GOAL, the international humanitarian assistance NGO. Tim was nominated to the Commission by the Irish Government.

Mitchell B. Reiss

Mitchell B. Reiss is a former United States Special Envoy for Northern Ireland with the rank of Ambassador. He was also the Director of Policy Planning at the State Department and has worked at the National Security Council. Outside of government,

he has been a Partner in the Brunswick Group, helping lead their geopolitical risk practice, President and CEO of The Colonial Williamsburg Foundation in Virginia and President of Washington College in Maryland. Mitchell is on the Board of the International Churchill Society (dedicated to preserving the legacy of Sir Winston Churchill) and has also published widely on national security issues. He consults in the United States and globally on higher education and historic sites. Mitchell was nominated to the Commission by the UK Government.

Support Arrangements

The Commission is supported by UK and Irish Secretariats, comprising a UK Joint Secretary and an Irish Joint Secretary, and three Secretariat staff. The IRC Joint Secretariat works collectively to assist the Commissioners in the delivery of the Commission's statutory functions and advises the Commissioners jointly.

The costs of the UK Secretariat and remuneration for Commissioners McBurney, McWilliams and Reiss are funded by the UK Government. These Accounts relate to expenditure incurred by the UK Secretariat, including payments made to those three Commissioners during the year. The UK Secretariat is sponsored by the Northern Ireland Office but operates wholly independently as an arm's length body. Detailed parameters of that relationship are set out in a Framework Document, which was updated in 2023 ¹⁰. The costs of Irish civil servants and remuneration for Commissioner O'Connor are funded by the Irish Government and are not the subject of this Report.

Over the course of the year, the UK Secretariat had three staff in post seconded from the Civil Service, and from November 2024 agency staff have covered the vacant finance and administrative support function to cover the gap while recruitment is ongoing. The Commission also made use of services provided by external professionals, including media services, audio visual support and audit.

Independent Reporting Commission Framework Document PDF (opens in a new window) https://www.ircommission.org/files/ircommission/2023-03/Independent Reporting Commission Framework Document.pdf

Financial Statements

These Accounts have been prepared in accordance with a direction issued by the Northern Ireland Office (NIO) under Article 10 of the Treaty. They include a Statement of Comprehensive Net Expenditure, a Statement of Financial Position, a Statement of Cash Flows and a Statement of Changes in Taxpayers' Equity, and Notes.

Commission's activities

The Commission consults with a range of stakeholders including the UK and Irish Governments, the NI Executive, law enforcement agencies in both jurisdictions, and other statutory bodies, local Councils, community and civic society organisations working in Northern Ireland, and other individuals and groups. This engagement is a key part of its work and ensures that the Commission has a clear understanding of the impact of paramilitary activity on communities and can report effectively on progress towards ending it. The Commissioners are expected to commit approximately 35 days per year to Commission business.

The table below sets out the number of Commission meetings held and the number of stakeholders the Commissioners and Secretariat met during the period 1 April 2024 to 31 March 2025.

| | 1/4/24 – | 1/4/23 – | 1/4/22 – | 1/4/21 – | 1/4/20 – |
|--|----------|----------|----------|----------|----------|
| | 31/3/25 | 31/3/24 | 31/3/23 | 31/3/22 | 31/3/21 |
| | | | | | |
| Number of stakeholder meetings (Commissioners) | 61 | 61 | 57 | 81 | 60 |
| Number of stakeholders (Commissioners) 11 | 70 | 64 | 76 | 106 | 76 |
| Number of stakeholder meetings (Secretariat) | 50 | 73 | 90 | 84 | 32 |
| Number of stakeholders (Secretariat) 12 | 57 | 62 | 69 | 66 | 18 |

¹¹ A number of these stakeholders engaged with the Commissioners on more than one occasion during the year; they are only counted once for the purposes of this figure. Some meetings may have included multiple stakeholders.

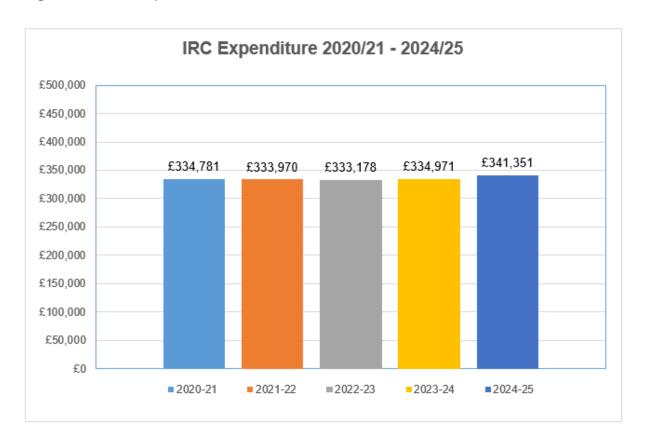
¹² A number of these stakeholders engaged with the Secretariat on more than one occasion during the year; they are only counted once for the purposes of this figure. Some meetings may have included multiple stakeholders.

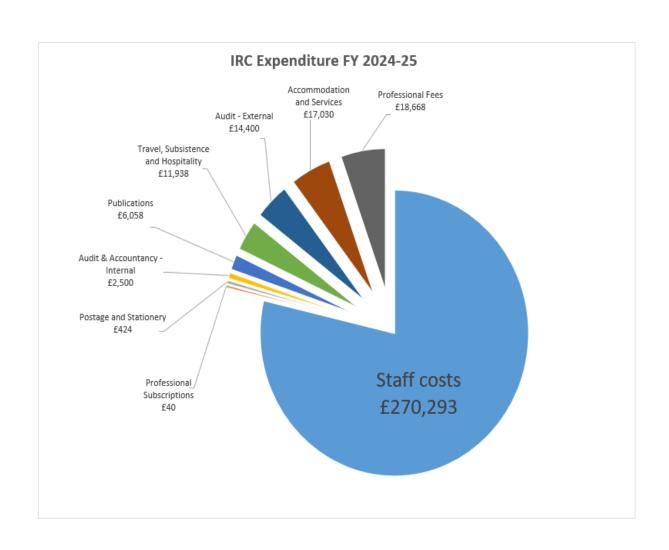


¹³ It is also required to report more frequently than annually if the UK and Irish Governments requests this – no such request was received during the reporting period.

The Commission's primary expenditure is on staff costs (Commissioners and UK Secretariat); accommodation and services; professional services including media support, research and audit; and travel, subsistence and hospitality (as detailed in the Financial Statements). A detailed breakdown of costs is set out in Notes 2 and 3 on page 75, and Figure 1 below. The Commission has not launched any new programmes or projects and has not encountered any significant financial issues. The graph below shows the IRC's annual expenditure since its formal establishment.

Figure 1 – IRC Expenditure





Our Performance

The Commission's Strategic Direction and Business Plan ¹⁴ underpins the work undertaken by the Commission to discharge its Treaty functions as well as those requirements common to all public sector organisations in relation to good governance and the effective use of resources. The Commission's objectives are reviewed annually to ensure that they remain fit for purpose. All objectives were met in full during the period 1 April 2024 to 31 March 2025. The Commission will continue to fulfil its mandate of reporting, consulting/engaging and making recommendations in the coming Financial Year.

A detailed analysis of performance against the Commission's Business Plan during the reporting period is set out below:

To report annually or more frequently if jointly requested by the UK and Irish Governments, on progress towards ending continuing paramilitary activity, in particular from those paramilitary groups declared to be on ceasefire.

To provide a considered analysis of progress towards ending paramilitary activity, analysing progress on two tracks:

- policing and criminal justice interventions, and
- measures addressing socioeconomic issues affecting those communities where the paramilitaries primarily operate.

The Commission published its Seventh Report on progress towards ending paramilitary activity on 25 February 2025. The Report was laid before the Houses of Parliament and Oireachtas, and presented to the NI Assembly, and a press conference was held to present key messages from the Report.

Throughout the course of the financial year the Commissioners held 61 meetings and consulted with 70 stakeholders to inform their analysis, including those working

¹⁴ Independent Reporting Commission Strategic Direction and Business Plan <u>2024/25 PDF (775 KB) (opens in a new window)</u>

in communities, project delivery partners and organisations doing similar work, the PSNI, NI Executive parties, the UK and Irish Governments, An Garda Síochána, statutory agencies, academics, individuals, local communities and civic society organisations. In addition, the Secretariat undertook 50 meetings with 57 stakeholders on the Commission's behalf. (Some of these stakeholders engaged with the Commission more than once.) We continued to invite members of the public and other organisations to correspond on issues they wished to draw to the Commission's attention. These meetings and engagements helped the Commission to better understand the impact of paramilitarism on communities and the effect of various interventions, initiatives and projects, and informed the Report.

Section B of the Report presented data and research about the level and impact of paramilitary activity, building on similar analysis in previous Reports.

The Report also included detailed information in Section C about activities and work under Phase Two of the Executive Programme on Paramilitarism and Organised Crime, which started in 2021 and is now well underway and delivering results. The Report also covers relevant commitments made by the UK and Irish Governments related to the Fresh Start Agreement.

No ad-hoc reports were requested by the UK and Irish Governments during the reporting year.

To report on the implementation of the relevant measures of the Irish Government, the UK Government and the Northern Ireland Executive, including the Executive's Tackling Paramilitary Activity, Criminality and Organised Crime Action Plan and Phase Two of the Tackling Paramilitary, Criminality and Organised Crime Programme.

To provide:

- visibility on progress,
- ongoing impetus to implementation of the Executive's Action Plan and Phase Two of the Tackling Paramilitary, Criminality and Organised Crime Programme, and
- visibility on the relevant measures of the Irish Government and the UK Government.

The Commission's reports include an analysis of the implementation of measures set out in the Executive Action Plan and Phase 2 of the Executive Programme on Paramilitarism and Organised Crime. In addition to comments in the Overview Section, Section C of the Report gave detailed comments on various projects and initiatives.

As noted above, the Commissioners and Secretariat undertook a wide range of engagements to inform the Commission's work, and received various updates from the Executive, UK Government, Irish Government, statutory bodies and agencies, and others such as delivery organisations.

Key points from the Commission's Seventh Report included:

The Commission was established in 2017 to monitor progress towards ending paramilitary activity in Northern Ireland, as mandated by an international treaty agreed by the UK and Irish Governments. The establishment of the IRC stemmed from the 2015 Fresh Start Agreement which aimed to address the complexities underlying the continuation of paramilitarism in Northern Ireland, emphasising the importance of peace and political stability. The Agreement

identified a key goal: the ending of paramilitary activity 'once and for all' and it is in that context that we frame our Reports.

The Commission describes the situation in 2024 in terms of paramilitarism as 'mixed'. While there was a decrease in shooting incidents and paramilitary style assaults, bombing incidents and casualties from paramilitary style shootings remained consistent with previous years. Intimidation, coercive control, and threats linked to paramilitary groups continued to persist and remained a real concern. The Commissioners were encouraged that in March 2024, the Northern Ireland-related Terrorism Threat Level was reduced from 'severe' to 'substantial'. They also noted that with over 100 projects, the Executive Programme on Paramilitarism and Organised Crime is having a real impact, and alongside the police and security forces disrupting criminal activity, all these measures were now having a tangible effect in communities where paramilitaries operate. A further worrying feature of the situation in 2024 was that there was a paramilitary element involved in a number of racist incidents related to immigration, according to the PSNI.

However, the IRC noted that the IRA and Loyalist paramilitary ceasefires three decades ago were a turning point in the overall effort to bring the Northern Ireland conflict to an end. The ceasefires did not prove to be the end itself, but they could be described as the beginning of the end and given the transformation of society over the last three decades, there are grounds for optimism that the goal of the Fresh Start Agreement of ending paramilitarism "once and for all" can still be achieved.

The IRC acknowledged the complexity of paramilitarism in 2024. It encompasses a range of individuals: some that use paramilitarism as a cloak for overt criminality, some are involved for reasons related to various factors including socio-economic deprivation, adverse childhood experiences, poor educational and employment opportunities, addiction issues, mental health problems, peer pressure and the absence of positive role models, and some remain engaged in paramilitarism for political and identity reasons which reach back to the Troubles/conflict. The Commission believes that the nature of

paramilitarism continues to evolve and while the Commissioners acknowledge it is not the same as it was during the height of the Troubles/conflict, some features are similar to the past. In 2024, there have been shifting dynamics within both Republican and Loyalist paramilitary groups, including changes in leadership, reported splits, speculation about possible feuds, ongoing questions about whether actions were sanctioned by paramilitary leaders, various interpretations of larger gatherings of people, and increasing interactions with organised crime. The Commission understood that these shifting dynamics can pose challenges for the PSNI and others in attributing responsibility for, or involvement in, certain actions, and where there is paramilitary involvement in criminal activity, this must be called out and the harm it causes must be named

Policing and justice measures are key in bringing paramilitarism to an end; the Commission summarises their analysis of Tackling Paramilitarism as "a Twin Track approach". Track One comprises a robust and targeted set of law enforcement measures addressing paramilitarism, coupled with an effective wider criminal justice response. Track Two involves a comprehensive tackling of the deep-rooted socio-economic conditions which are linked to the continuing existence of paramilitarism today (such as deprivation and lack of educational opportunity). Both Tracks, which are inter-related, are vital in the task of tackling and ending paramilitarism.

The Seventh Report advocates for a third dimension to complement the Twin Track approach: an agreed formal process of Group Transition, involving direct engagement with the paramilitary groups themselves, in order to bring about their ending. The Commission's analysis recognises that while law enforcement measures can frustrate and disrupt paramilitary activity, solely relying on those measures will not bring an end to paramilitarism. The Commissioners recognised this is a complex and controversial recommendation, and again in their Seventh Report proposed an intermediate step in the form of the appointment by the UK and Irish Governments of an Independent Person who would scope out and prepare the ground with various stakeholders for what a possible formal process of engagement and Group Transition might look like.

The Commission welcomed the progress being made by the two Governments towards implementing their recommendation to appoint an Independent Person to carry out this scoping work and made clear that Group Transition is not a substitute for the Twin Track Approach to tackling paramilitarism. Without the Twin Tracks of robust policing and criminal justice measures, and the sustained and determined support measures for the communities where the paramilitaries operate, Group Transition has little or no chance of success.

The IRC's Seventh Report acknowledges there are signs that some partial dimension of Transition is already taking place organically and without a formal process. However, faster and more widespread progress is needed. The Commission noted that in recognition of the fact that groups do not look the same as they did during the Troubles/conflict, it is important that the UK Government review the proscription regime to ensure that only those groups which currently meet the test remain proscribed, and that there is clear information and support for those applying for deproscription. This has been a repeated recommendation from successive Independent Reviewers of Terrorism Legislation that proscription should have a fixed term.

The current phase of the Executive Programme on Paramilitarism and Organised Crime will conclude at the end of March 2027. There are now over 100 projects and initiatives running under the aegis of the Programme, and their impact can be seen on a daily basis in communities where the paramilitaries operate. The Commissioners have seen many examples of this work and have been very impressed by the real difference it is making in the lives of communities affected by paramilitarism, and they were particularly taken by what they heard from young people participating in various initiatives of the Programme and the positive effect on their lives and prospects. The Commission welcomed the focus on paramilitarism in the new draft Programme for Government and the commitments that people will get the support they need at every stage of their lives by removing barriers to education and employment, to take action to address poverty, to improve access to services, and to take steps to help those who are struggling, especially in areas where inequality hits

hardest or where issues like crime, poverty, addiction, poor mental health and other health challenges are most keenly felt. All of these factors are involved in the task of tackling and ending paramilitarism, are long-term in nature and require a sustained, comprehensive policy approach, together with the necessary investment

In their Seventh Report the Commissioners state that it is vital that thorough consideration is given to what will come after the Programme ends in March 2027. They recommended that some of the targeted paramilitary-focused work which the Programme has been responsible for should continue beyond 2027, while also ensuring that consideration is given to those elements of the work of tackling paramilitarism that could be integrated into mainstream policies. They stated that they believed there will continue to be the need for a central team to oversee this work, monitor progress, and build connections across the community and statutory sector, and for a collective, whole of government approach integrating paramilitarism into broader government policies and strategies, with training for public servants to raise awareness and promote a proactive approach. It is the Commission's view that it is vital that dedicated work to tackle paramilitarism is appropriately funded, as well as transformational work to enhance the socio-economic context, but to enable this targeted work to "add value", it is equally important that core service delivery is adequately resourced. Efforts to tackle paramilitarism beyond 2027 need to reflect the reality that this is a long-haul task which is part of the unfinished business of the peace process and must continue to build on the learning and progress of The Executive and the two Phases One and Two of the Programme. Governments must ensure that work to tackle paramilitarism continues to be given a high priority beyond 2027.

The Commission noted the changes to the UK and Irish Governments and their continued commitment to ending paramilitarism, and welcomed the restoration of the Executive, bringing political leadership and stability, which will be key to tackling paramilitarism. They were encouraged that the joined-up, whole of government approach to tackling paramilitarism was sustained in 2024. The Commissioners acknowledged that the Sponsor Group continued to bring

leaders from various organisations together to give priority to the Programme's work, and they noted that it will have a central role going forward in the design of future work from 2027 onwards. The Commissioners therefore recommended that the Sponsor Group continue to regularly review its membership to ensure that its representation is as comprehensive as it needs to be.

The Seventh Report continued to highlight the importance of data and evidence in understanding the complexities of paramilitarism and shaping effective public policy. The Commissioners welcomed the continued public health approach within the Programme, and the prioritisation of trauma informed approaches in 2024, which recognises the need for services and policies to connect with people who have experienced trauma and shaping services and delivery with this in mind.

During 2024 the Commissioners met with the leaders of the Prison Services in both jurisdictions and heard firsthand the continuing challenges with ongoing paramilitarism. The Commissioners were encouraged by the strong level of cooperation between the two Services and felt it should be enhanced further as prisoners remain a key dimension of the conflict and will require a particular focus in ending paramilitarism. The Commissioners encouraged the two Prison Services to build on the co-operation in place, and to consider further enhancement of that co-operation in regard to paramilitarism.

Additionally, the Report touches on the legacy of the past, victims and survivors of the Troubles/conflict, memorialisation, shared housing and integrated education, the role of women in tackling paramilitarism, and drugs and the link to paramilitary activity.

The Report made three recommendations, which are summarised under objective 4 below.

In carrying out its functions, consult:

the Northern Ireland Executive,
 the PSNI, relevant statutory

To engage to inform the work of the Commission and understand the issues linked to its mandate.

- agencies, local Councils, communities and civic society
- the UK Government and relevant law enforcement agencies,
- the Irish Government and relevant law enforcement agencies

The IRC's engagement with stakeholders throughout the 2024-25 financial year was driven by its statutory duty to report on progress towards ending paramilitary activity connected with Northern Ireland. A Stakeholder Engagement Plan was in place and during the year we engaged with leaders of Northern Ireland's political parties (or their representatives), statutory agencies, community groups, community representatives, individuals and civic society organisations. The Commission's engagements this year also included consultations with officials from the Northern Ireland Office, the PSNI, the National Crime Agency, HMRC and others. In addition, the Commission met senior officials and Ministers in the Department of Justice, the Department of Foreign Affairs and law enforcement agencies in Ireland during the reporting period. The Commissioners drew on all of this engagement, and its other activities described in the Report, to develop its analysis of progress towards ending paramilitary activity which was published in its February 2025 Report.

Make recommendations to the Northern Ireland Executive in order to inform future Programme for Government priorities and commitments, and to inform the implementation of the Executive's Programme.

To make recommendations where appropriate that influence the Programme for Government and to inform the implementation of the Executive's Programme.

The Commission made three recommendations in its Seventh Report on progress towards ending paramilitary activity and provided an update on the actions taken regarding previous recommendations – where necessary it highlighted areas for further work. These recommendations were:

1. Sponsor Group to review membership

The Sponsor Group, which is chaired by the Head of the Northern Ireland Civil Service, plays an important role by bringing together leadership figures in the various organisations involved in the Programme's implementation. The Sponsor Group will have a particularly central role in the design of future work after the conclusion of the Executive Programme on Paramilitarism and Organised Crime in March 2027 and finding the balance between maintaining a targeted approach to tackling paramilitarism and projects which can be scaled-up and mainstreamed. In that regard, we recommend that the Sponsor Group look again at its membership to ensure that its representation is as comprehensive as it needs to be, giving consideration to important work being done by organisations such as the Probation Board.

2. Raising awareness among Northern Ireland public servants and mapping policy links to paramilitarism

We believe that it is essential to take a whole of government approach to tackling paramilitarism, and when government policies are being developed and updated, consideration should routinely be given to how that work can contribute to tackling paramilitarism. We recommend training be developed for all Northern Ireland public servants that raises awareness of paramilitarism, describes current work and gives officials tools to consider how strategies and policies can play a part in addressing paramilitarism. We also encourage the Executive to explore introducing requirements on Departments to map the contributions and opportunities for mainstream policies to play their part in tackling paramilitarism, and to monitor delivery so that the contribution can be tracked.

3. Continuing paramilitary-focused work beyond 2027

The Programme will come to an end in March 2027, and it is vital that thorough consideration is given to what will come afterwards. We have already highlighted the importance of ensuring the maintenance of the necessary funding for this work, despite the challenging fiscal backdrop. Efforts to tackle paramilitarism beyond 2027 need to reflect the reality that this is a long-haul task which is part of the unfinished business of the peace process and must continue to build on the good learnings and progress of Phases One and Two. We strongly recommend that the

kind of paramilitary-focused work which the Programme has been responsible for should continue beyond 2027, while also ensuring that consideration is given to those elements of the work of tackling paramilitarism that could be integrated into mainstream policies. The Executive and the two Governments must ensure that work to tackle paramilitarism continues to be given a high priority beyond 2027. The work done to date must be built upon and further efforts made to tackle this issue once and for all.

Carry out functions with a view to supporting long term peace and stability in society and stable and inclusive devolved Government in Northern Ireland.

To report on practical, comprehensive and effective measures which contribute to ending paramilitarism and to highlight areas of good practice in this regard.

Detailed commentary on the implementation of measures to tackle paramilitarism was set out in the Commission's Report on progress towards ending paramilitary activity published on 25 February 2025. The report highlighted where good progress has been made and where further progress is required. A number of examples of good practice were also highlighted.

- To maintain high standards of corporate governance and ensure value for money is achieved.
- To achieve high standards of corporate governance.
- To ensure value for money.
- Website established in line with Commission requirements.
- To ensure all information and information assets are managed and stored by the Commission in line with relevant policy.

The Commission has well-developed systems and structures in place for managing its corporate governance responsibilities, and adheres to relevant policies,

procedures and requirements. A suitable range of relevant corporate governance documents are in place and govern how the Commission undertakes its work. Those documents are regularly reviewed and a review schedule is in place.

The Commission follows public sector procurement regulations, policy and practice to ensure that value for money is achieved. Rigorous financial monitoring arrangements are in place and operated, and the IRC's spend was within budget again this year. In-year efficiencies were identified and made. Payments were processed in line with agreed procedures and timelines. The Commission published its Annual Report and Accounts for 2023-24 on 29 July 2024 (delayed because of the general election).

As covered in greater detail on pages 30 and 31, 34 and 35 of this document, a risk register was maintained and reviewed regularly to underpin the approach to risk, and risks were managed on an ongoing basis.

The UK Secretariat engaged regularly with the Northern Ireland Office sponsor team and its finance team throughout the year, in line with policy and the IRC's framework document.

The Commission has its own website with relevant information and it is updated with new publications.

The UK Secretariat adopts relevant UK and Irish Government policies in relation to management and storage of information and information assets. A framework to ensure compliance with General Data Protection Regulation (GDPR) requirements is in place.

- Maintain an effective secretariat to enable the Commission to deliver on its statutory duties and objectives.
 - Ensure that the necessary staff and resources are secured to meet the full requirements of the Commission within budget allocation.

- The provision of an efficient and effective service to the Commission.
- Ensure the protection of the good reputation of the IRC.

UK Secretariat staff worked jointly with their counterparts in the Irish Secretariat to deliver a high-quality and efficient service to the Commission. Vacancies arising in the UK Secretariat during the year were filled in line with Civil Service recruitment practice, with short-term administrative support for financial transactions provided by the Northern Ireland Office and agency staff due to a gap.

The budget was carefully managed and staff were managed, appraised and developed in line with relevant Human Resource and Departmental requirements. In March 2024 the Commission re-tendered for a media services contract for the period of one year, with the possibility of extension up to one further year, and subsequently in March 2025 the contract was extended until March 2026. The media adviser supports planning and arranging the media campaign for the launch of the Commission's Reports, manages media enquiries throughout the year and provides public relations advice in order to uphold and maintain the IRC's reputation. In addition, the Commission through all of its work – particularly engagement, consultation and reporting – strove to promote and uphold the reputation of the Commission.

Sustainable Development:

The Commission is treated as an Executive Non-Departmental Public Body of the Northern Ireland Office for accounting purposes. It is not part of a government department, operates at arm's length from ministers and employs less than 50 employees, and is exempt from complying with His Majesty's Treasury guidance on sustainability reporting. The Commission is also exempt from Task Force on Climate Related Financial Disclosure as it employs less than 500 employees, and total operating and income and funding received does not exceed £500m. However, the Commission supports 'Greening Government' commitments and broadly mirrors the Northern Ireland Office's best practice in relation to sustainability and reducing impact

on the environment. This includes the use of video and teleconferencing facilities to reduce our energy "footprint", reducing our energy consumption through the use of modern and more efficient technology, and the UK Secretariat operate out of premises managed in accordance with sustainable standards.

Key risks and issues

Risks are managed on an ongoing basis. There is a process in place designed to identify and prioritise risks, evaluate the likelihood of those risks being realised and the impact they would have, and to manage them appropriately. A risk register is maintained and underpins the Commission's approach to risk, following the Northern Ireland Office's risk management policy and guidance. The risk register is reviewed by the Joint Secretaries on a regular basis and by the Commissioners on a quarterly basis. It is also reviewed periodically by the Northern Ireland Office's Audit and Risk Assurance Committee.

The key risks for the IRC relate to the Commission being prevented from discharging its core functions of reporting on progress to end paramilitary activity and on the implementation of relevant measures by the Governments of the UK and Ireland and the Executive, including the Executive Action Plan. These risks include the Commission remaining quorate, having the necessary staffing and financial resources, facing barriers and challenges to required engagement, the strategic environment, and a denial of service (such as IT failure). Mitigating steps have been taken in respect of each, including regular engagement with relevant Government departments, dynamic, targeted and up-to-date engagement plans which are frequently reviewed, and a clear set of contingency arrangements.

Robust corporate governance structures are in place to mitigate risks pertaining to the effective discharge of statutory and other obligations and have continued to be effective to that end.

The accounts have been prepared pursuant to Article 10 of the International Treaty between the UK Government and the Irish Government, and on a going concern basis. The Statement of Financial Position as at 31 March 2025 shows net liabilities of £19,393 (2024: £13,440). The Commission will continue to exist until the Treaty obligations are terminated by mutual agreement between the UK Government and the Irish Government. There is an ongoing commitment to support the work of the Commission until the Treaty obligations are terminated – the NIO has given the Commission no indication that it intends to pursue this course of action at this point in time. As such, the Commission continues to be legally required to produce a Report

annually on progress towards ending continuing paramilitary activity connected with Northern Ireland.

The future financing of the Commission's liabilities, in relation to the costs of the UK Secretariat and remuneration of three Commissioners, will continue to be met by the Northern Ireland Office. The Commission's 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 covering the period 2026-29. 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 it has accordingly been considered to adopt a going concern basis for the preparation of the 2024-25 financial statements.

Niamh Ó Maolain

UK Joint Secretary & Accounting Officer

24 June 2025

Accountability Report

Corporate Governance Report

Director's Report

Introduction

The UK Secretariat to the Commission is sponsored by the Northern Ireland Office. For accounting purposes, the Commission is treated as a Non-Departmental Public Body. The Commission's statutory responsibilities and governing legislation are set out on pages 4 to 6 of the Performance Report.

Commission membership

The following served as Commissioners during the reporting period:

- John McBurney;
- Monica McWilliams;
- Tim O'Connor; and
- Mitchell B. Reiss.

Their biographies can be found on pages 7 to 9 of this Report.

Recruitment Practice

The UK Secretariat staff in post over the reporting period were seconded from the Civil Service in line with Civil Service recruitment and selection policy which requires that appointments to the Civil Service be made strictly on merit and through fair and open competition. The UK Joint Secretary post became vacant in November 2024, and following an Expression of Interest campaign an interim UK Joint Secretary was appointed until the post is filled through fair and open competition. Due to a vacancy in the Finance and Administration support function (Band D post), agency staff have been employed to fill the gap until the post is filled through fair and open competition.

The Commission also made use of services provided by an external media adviser who was appointed under public sector procurement procedures.

Audit and Risk Assurance Committee

The Northern Ireland Office's Audit and Risk Assurance Committee provides a challenge and assurance function for the Commission. As at 31 March 2025, the Northern Ireland Office's Audit and Risk Assurance Committee comprised:

- Les Philpott (Chair), Lead Non-Executive Board Member;
- Fiona Ross, Non-Executive Director; and
- Neil Sayers, Non-Executive Director.

Risk Management

The Commission is committed to ensuring high standards of corporate governance. We have identified our risk appetite as well as defining strategy and determining resource allocation to ensure the delivery of the Commission's objectives. Our system of internal control is designed to manage risk to a reasonable level rather than to eliminate all risk. The Northern Ireland Office's Audit and Risk Assurance Committee oversee this work under an independent Chair. An overview of the IRC's significant risks is set out at page 30.

Personal Data Related Incidents

We are committed to safeguarding all retained personal data. Risks in this area are recorded in the Commission's risk register. There were no personal data related incidents reported to the Information Commissioner's Office during the reporting period.

Register of Interests

The Commissioners and Joint Secretaries are required to provide information of personal or business interests that might be perceived by a reasonable member of the public to influence their judgment in the exercise of their statutory functions. To that end, the Commission maintains a register of declared interests which is available for public inspection if requested. The register is reviewed on a monthly basis by the Commission and is updated if required. No interests were declared by Commissioners or senior staff during the reporting year which conflict, or may be perceived to conflict, with exercising their statutory responsibilities. UK Secretariat staff are also required

to register conflicts of interest and come under the Business Appointment Rules applied by their parent Department.

Auditors

The financial statements are audited by the Comptroller and Auditor General. The audit fee for this period is £12,000 (plus VAT). The audit fee for 2023-24 was £10,000 (plus VAT).

During 2024-25, the Commission was able to avail of internal audit services via its sponsor department's arrangements; however, no internal audits were completed.

Statement of Accounting Officer's Responsibilities

In accordance with Article 10 of the Treaty, and the IRC Framework agreed with the NIO, the NIO has directed the UK Joint Secretary to prepare, for each financial year, a statement of accounts in respect of the monies provided by the UK Government in the form and on the basis set out in the Accounts Direction which the Treasury has approved. The accounts are prepared on an accruals basis and must give a true and fair view of the state of affairs of the Commission and of its net expenditure, financial position, cash flows and changes in Taxpayers' Equity for the financial year.

In preparing the accounts the Accounting Officer of the Commission is required to comply with the requirements of the *Government Financial Reporting Manual* and in particular to:

- Apply suitable accounting policies on a consistent basis;
- make judgements and estimates on a reasonable basis;
- state whether the applicable accounting standards as set out in the Government
 Financial Reporting Manual have been followed, and disclose and explain any
 material departures in the accounts;
- preparing the accounts on a going concern basis, preparing financial statements which give a true and fair view in accordance Article 10 of the Treaty and the Framework Document agreed between the Independent Reporting Commission and the Northern Ireland Office;

 preparing the annual report, which includes the Remuneration and Staff Report, in accordance with Article 10 of the Treaty and the Framework Document agreed between the Independent Reporting Commission and the Northern Ireland Office.

The Northern Ireland Office, with the consent of the Treasury, has appointed the UK Joint Secretary 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 His Majesty's Treasury.

Statement on the disclosure of relevant audit information

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. I confirm that the Annual Report and Accounts as a whole is fair, balanced and understandable. I take personal responsibility for the Annual Report and Accounts and the judgements required for determining that it is fair, balanced and understandable.

Governance Statement

Introduction and Context

The Commission is an independent body corporate established by Treaty between the UK and Irish Governments and by corresponding legislation in each jurisdiction. The Treaty was signed in September 2016 and came into force on 8 August 2017 following completion of the relevant legislative processes in the UK and Ireland.

For administrative purposes the Commission is treated as a Non-Departmental Public Body sponsored by the Northern Ireland Office of the UK Government.

The UK Secretariat consists of three staff, including myself as the UK Joint Secretary. The UK and Irish Secretariats meet at least weekly, and the Commission meets on a monthly basis. As the UK Joint Secretary, I am also appointed as Accounting Officer and so am responsible and accountable to Parliament for the use of UK public money and the stewardship of public assets.

I meet with the Sponsor Team within the Northern Ireland Office on a monthly basis to discuss corporate governance matters, and with the Finance Team within the Northern Ireland Office on a regular basis to review finances.

In November 2024, the UK Joint Secretary post became vacant, the post was filled on an interim basis until I was appointed through open and fair competition in June 2025. On written and verbal handover of the accounts, I am assured that there is nothing that causes me concern, the IRC is robust in ensuring value for money and strong monitoring and scrutiny of all cash spent has been maintained, there is effective internal controls and management of risks, in accordance with the UK Government's Managing Public Money guidance

Scope of Responsibility

As Accounting Officer I have personal responsibility for the robustness of the control and governance arrangements operated by the Commission. I have continued to maintain a sound system of internal governance that supports the achievement of the Commission's policies, aims and objectives whilst safeguarding the public funds and Departmental assets for which I am personally responsible in accordance with the

responsibilities assigned to me as Accounting Officer. As such, I am responsible for ensuring propriety and regularity in the handling of those public funds.

My assessment of the Commission's internal controls is informed by the work of the Government Internal Audit Agency, the National Audit Office, the Commissioners, the sponsor Department and the Northern Ireland Office's Audit and Risk Assurance Committee.

In my role as UK Secretary to the Commission I am responsible for the effective operation of the UK Secretariat. I have personal responsibility for managing the Commission's financial and other resources made available by the UK Government. I am jointly responsible with my Irish Secretariat counterpart for the provision of advice and support to the Commissioners in delivering their aims and objectives, and in undertaking their Treaty responsibilities.

Governance Framework

The Commission operates under a Framework Document with the Northern Ireland Office which sets down the Commission's broad framework and governance arrangements, and lines of accountability (in accordance with Chapter 7 of Managing Public Money and the principles set out in *Partnerships between departments and arm's length bodies: code of good practice*).

The Commission conducts its affairs in accordance with a comprehensive Code of Governance. That Code is reviewed annually. It is based on best practice in both the UK and Ireland and covers matters such as corporate responsibility, accountability for public funds and handling conflicts of interest. The Code is supported by internal and NIO governance policies that draw on best practice and guidance on matters such as Anti-Fraud and Whistleblowing (which are considered to be effective); the acceptance of Gifts and Hospitality; Financial Management; Risk Management and Information Assurance. Although not part of central government, the Commission is expected to follow the Corporate Governance Code (Corporate governance in central government departments, code of good practice, published by HM Treasury and the Cabinet Office in April 2017) as far as applicable. This is reflected in the Framework Document and the Commission's Code of Governance, which the Commission has complied with.

I complete Stewardship Statements to provide reassurances that adequate governance controls to ensure effective corporate management are in place based on my own knowledge of the Commission's corporate governance regime and activities. These statements are sent to the UK Secretariat's sponsor Department and to the Northern Ireland Office's Audit and Risk Assurance Committee. The purpose of the statements is to provide assurance to the sponsor department that specific responsibilities have been exercised with due care and attention.

Commission's Performance

The IRC's core objective is to promote progress towards ending paramilitary activity connected with Northern Ireland. A Strategic Direction and Business Plan setting out the Commission's objectives and how the Commission will discharge its statutory functions was in place for the reporting period. This was made available to the public on the Commission's website. The Strategic Direction and Business Plan and the Commission's performance against its objectives were reviewed during the year.

As noted on pages 16 to 28 of this Report, the Commissioners are satisfied that the end of year assessment is that the Commission's overall performance was effective and that all objectives were met in full during the year. The Commissioners kept the quality of the data they received from the Secretariat under review and were satisfied with the level and accuracy of the information made available to them.

As Accounting Officer I take assurance from a range of external sources on the Commission's governance, risk and control arrangements.

Work of the Audit and Risk Assurance Committee

Due to the size of the Commission, it would not be proportionate for it to be supported by an independent Audit and Risk Assurance Committee. The Northern Ireland Office's Audit and Risk Assurance Committee provides this advisory function to me as Accounting Officer and monitors the system of internal controls operated by the Commission.

During the reporting year the Audit and Risk Assurance Committee received updates on the management of the Commission's governance arrangements. As part of the stewardship statement process, I reported to the Audit and Risk Assurance Committee

that the established internal controls had operated effectively and that no significant weaknesses had been identified.

On the basis of the issues discussed and the evidence presented at its meetings during the reporting period, the Audit and Risk Assurance Committee concluded that the assurances it received throughout the year were satisfactory, and no significant internal control issues were identified. Information about other work of the Audit and Risk Assurance Committee is reported in the Annual Report and Accounts of the Northern Ireland Office.

Work of Internal Audit

As in previous years, internal audit services continued to be available to the Commission under the sponsor department's arrangements with the Government Internal Audit Agency. Although it was not deemed necessary to conduct any standalone audits of the Commission in-year, the Northern Ireland Office's public bodies were included where relevant in the scope of NIO audits during the reporting period. During 2024-25, the NIO internal audit plan included audits of spending controls and information management, and we are engaging the NIO about implications for our work.

In the next reporting period the Commission will continue to work closely with the sponsor team within the Northern Ireland Office and the Government Internal Audit Agency to identify areas of risk and consider its forward audit plan.

Capacity to manage risk

The Commission's corporate governance controls are designed to manage risk to a reasonable level rather than to eliminate all risk of failure to achieve policies, aims and objectives. It can therefore only provide reasonable and not absolute assurance of effectiveness. Risks are managed on an ongoing basis in a process that is designed to identify and prioritise the risks, evaluate the likelihood of those risks being realised and the impact they would have, and to manage them efficiently, effectively and economically.

Throughout the year the Commission had a risk register in place that has been assessed and reviewed by the Joint Secretaries and by the Commissioners on a

quarterly basis. The Commission assesses the overall risk using a RAG (Red, Amber, Green) rating system, in line with the Northern Ireland Office's risk management policy. Further detail about the risks facing the Commission is set out on pages 30 and 31 above.

Information Assurance

During the year information assurance and information security updates were provided to the Commissioners. No issues were reported to the Audit and Risk Assurance Committee.

There were no personal data related incidents reported to the Information Commissioner's Office.

Summary of effectiveness

There were no significant weaknesses in the Commission's system of internal controls which affected the achievement of the Commission's key policies, aims and objectives in 2024-25.

Niamh Ó Maolain

UK Joint Secretary & Accounting Officer

24 June 2025

Remuneration and Staff report

Commissioners' numbers and costs

There are three UK Government-funded Commissioners. Commissioners McBurney, McWilliams and Reiss are remunerated from funds provided by the UK Government. The costs of the Irish Secretariat and remuneration for Commissioner O'Connor are funded by the Irish Government and are not the subject of this report.

Remuneration policy

The UK Joint Secretary's post is graded within the Senior Civil Service (SCS). Pay and performance management arrangements for this post are in line with guidance issued by the Cabinet Office: *Guidance for Approval of Senior Pay* (last updated June 2023). Increases in the UK Joint Secretary's base pay are in line with the parameters of the Senior Salaries Review Board.

The remuneration of the other UK Secretariat staff aligns with those of the UK Civil Service. These pay arrangements continue to be performance related. Performance is appraised by line managers against agreed objectives.

Contracts of employment

The current Commissioners were reappointed to their roles from 1 April 2022 for a further three-year term, and on 31 March 2025 their appointments were extended until 30 September 2026. As the Commission was established under Treaty it will continue to exist until the Treaty obligations are terminated by mutual agreement between the UK Government and the Irish Government.

Staff appointments to the UK Secretariat are made in accordance with civil service recruitment and selection policy, which requires appointments to be made strictly on merit and through fair and open competition.

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

The following sections provide details of the remuneration and pension interests of the Commissioners and the Joint Secretary, who is also the Accounting Officer.

Single total figure of remuneration table (audited information)

| | Remur | ary/ neration 000) | Boi paym (£'0 | nents | (to ne | s in kind earest 00) | Pension benefits (to nearest £1,000) ¹⁵ | | Tota | I (£'000) |
|---|-------------------------|--------------------------|---------------------|-------|--------|----------------------------|---|---------------------|-------|-----------|
| | 24-25 | 23-24 | 24-25 | 23-24 | 24-25 | 23-24 | 24-25 | 23-24 ¹⁶ | 24-25 | 23-24 |
| UK Joint Secretary, Chris Atkinson (to 5 th November 2024) | 50-55 (FYE 80-85) | 80-85 | - | - | - | - | 20,000 | 31,000 | 70-75 | 110-115 |
| Interim UK Joint Secretary, Dianne Wilson (from 6 th November 2024 to 5 th January 2025 | 10-15 (FYE 75-80) | - | - | - | - | - | 32,000 | - | 40-45 | - |
| Interim UK Joint Secretary, Alexander Midgely (from 6 th January 2025) ¹⁷ | 15-20 (FYE 75-80) | - | - | - | - | - | 7,000 | , | 20-25 | - |
| Commissioner, John McBurney | 15-20 | 15-20 | - | - | - | - | - | - | 15-20 | 15-20 |
| Commissioner, Monica McWilliams | 15-20 | 15-20 | - | - | - | - | - | - | 15-20 | 15-20 |
| Commissioner, Mitchell Reiss | 15-20 | 15-20 | - | - | - | - | - | - | 15-20 | 15-20 |

The value of pension benefits accrued during the period is calculated as (the real increase in pension multiplied by 20) plus (the real increase in any lump sum) less (the contributions made by the individual). The real increase excludes increases due to inflation or any increase or decrease due to a transfer of pension rights.

The pension benefits of any members affected by the public service pensions remedy which were reported in 2022-23 based on alpha membership for the period between 1 April 2015 and 31 March 2022 have been reported since 2023-24 based on PCSPS membership for the same period.

Alexander Midgely acted as interim UK Joint Secretary before departing in May 2025. A UK Joint Secretary was appointed in June 2025 with Dianne Wilson acting as interim UK Joint Secretary in the intervening period.

Accrued pension benefits included in the above table for any individual affected by the Public Service Pensions Remedy have been calculated based on their inclusion in the legacy scheme for the period between 1 April 2015 and 31 March 2022, following the McCloud judgment. The Public Service Pensions Remedy applies to individuals that were members, or eligible to be members, of a public service pension scheme on 31 March 2012 and were members of a public service pension scheme between 1 April 2015 and 31 March 2022. The basis for the calculation reflects the legal position that impacted members have been rolled back into the relevant legacy scheme for the remedy period and that this will apply unless the member actively exercises their entitlement on retirement to decide instead to receive benefits calculated under the terms of the Alpha scheme for the period from 1 April 2015 to 31 March 2022

Salary and Remuneration

"Salary" includes gross salary; performance pay or bonuses; overtime; and any other allowance subject to UK taxation. "Remuneration" is the annual amount paid to the Commissioners and Joint Secretary. The Commissioners do not receive performance pay or bonuses, overtime, or any other allowance. This remuneration and staff report is based on accrued payments made by the Commission and thus recorded in these accounts.

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 (salary).

There were no benefits in kind paid during the 2024-25 financial period, or the 2023-24 financial period.

Fair Pay Disclosures (audited information)

Reporting bodies are required to disclose the relationship between the remuneration of the highest-paid employee in their organisation and the median remuneration of the organisation's workforce.

| | 2024-25 | 2023-24 |
|---|----------------------|-------------------|
| Band of Highest Paid Director FYE | | |
| Total Remuneration ¹⁸ | £75,000 - £80,000 | £80,000 - £85,000 |
| Percentage change in | | |
| performance pay and bonuses for | | |
| highest paid Director | 0% | 0% |
| Median total pay and benefits ratio | 1.83 | 2.01 |
| Median total pay and benefits ¹⁸ | £42,422 | £41,045 |
| Percentage change in Director | | |
| total pay and benefits 18 | -5.14% ¹⁹ | 5.69% |
| Ratio between highest paid | | |
| director and 25th Percentile | 2.19 | 2.42 |
| 25th Percentile total pay and | | |
| benefits ¹⁸ | £35,367 | £34,139 |
| Ratio between highest paid | | |
| director and 75th Percentile | 1.57 | 1.72 |
| 75th Percentile total pay and | | |
| benefits ¹⁸ | £49,477 | £47,952 |

¹⁸ Total pay and benefits is the same as the salary component of total pay and benefits19 The percentage change in directors total pay and benefits is based on full year equivalents

Total remuneration includes salary, non-consolidated performance-related pay and benefits in kind as well as severance payments. It does not include employer pension contributions and the cash equivalent transfer value of pensions.

The ratio between the highest paid director's remuneration and the pay and benefits of the employee on the 25th percentile of pay and benefits of the entity's employees for the financial year was 2.19:1 (2023-24, 2.42:1). The ratio between the highest paid director's remuneration and the pay and benefits of the employee on the 75th percentile of pay and benefits of the entity's employees for the financial year was 1.57:1 (2023-24, 1.72:1). The reduction in pay ratio is attributable to a decrease in the highest paid director's remuneration.

The banded remuneration of the highest-paid member of staff of the UK Secretariat as at the financial year end 2024-25 was £75,000 - £80,000 (2023-24, £80,000-£85,000). This was 1.83 times (2023-24, 2.01) the median remuneration of the workforce which was £42,422 (2023-24, £41,045). The reduction in pay ratio is attributable to a decrease in the highest paid director's remuneration. The median pay ratio for 2024-25 is consistent with the pay, reward and progression policies for employees taken as a whole. The range of staff remuneration in 2024-25 was £28,312 (2023-24, £27,233) for the lowest paid member of staff, to £76,000 (2023-24, £80,013) for the highest paid member of staff. The lower quartile remuneration (i.e. the total remuneration of the staff member (s) on the 25th percentile of the linear distribution) and the upper quartile on the 75th percentile of the linear distribution – excluding the highest paid member of staff were £35,367 and £49,422 (2023-24: £34,139 and £47,952). The salary component for the median, 25th percentile and 75th percentile figures were £35,367, £42,422 and £49,477 respectively.

For employees of the entity taken as a whole, the average percentage changes from the previous financial year of salary and allowance was -9.3%, and the percentage change in performance pay and bonuses payable was (100%) (2023-24, -17%). Pay arrangements relating to the use of agency staff has been excluded as this would give rise to distorted results.

The calculations exclude the remuneration to the Commissioners as their employment terms and conditions, including rates of remuneration, are determined by the UK and

Irish Governments and the Commission is unable to influence those rates. Details of the Commissioners' and UK Joint Secretary's remuneration are provided above.

There was no severance pay in 2024-25 (nil in 2023-24).

Pension Benefits (audited information)

Commissioners

No pension contributions were made for Commissioners in the period ended 31 March 2025 or in the period ended 31 March 2024.

Accounting Officer

Real increase in CETV at CETV at Real Accrued pension **Employer** 31/3/2420 at pension age as 31/3/25 contribution pension and increase in at 31/03/25 and related lump **CETV** to partnerrelated lump sum sum at ship pension pension age account £'000 £'000 £'000 £'000 £'000 Nearest £100 **UK** Joint Secretary, Chris Atkinson 0-2.5 210 15-20 185 9 (to 5th November 2024) Interim UK Joint Secretary, Dianne Wilson 30-35 plus a lump 0-0.25 plus a lump (from 6th 732 695 34 sum of 70-75 sum of 2.5-5 November 2024 to 5th January 2025 Interim UK Joint Secretary, Alexander 5-10 0-2.5 93 88 3 Midgley (from 6th January 2025)

²⁰ The pension benefits of any members affected by the public service pensions remedy which were reported in 2022-23 based on alpha membership for the period between 1 April 2015 and 31 March 2022 have been reported since 2023-24 based on PCSPS membership for the same period.

Accrued pension benefits included in the above table for any individual affected by the Public Service Pensions Remedy have been calculated based on their inclusion in the legacy scheme for the period between 1 April 2015 and 31 March 2022, following the McCloud judgment. The Public Service Pensions Remedy applies to individuals that were members, or eligible to be members, of a public service pension scheme on 31 March 2012 and were members of a public service pension scheme between 1 April 2015 and 31 March 2022. The basis for the calculation reflects the legal position that impacted members have been rolled back into the relevant legacy scheme for the remedy period and that this will apply unless the member actively exercises their entitlement on retirement to decide instead to receive benefits calculated under the terms of the Alpha scheme for the period from 1 April 2015 to 31 March 2022.

The pension information for the senior management team follows guidance in the Employer Pension Notice EPN727 issued by the Civil Service Pensions.

Pension benefits are provided through the Civil Service pension arrangements. Before 1 April 2015, the only scheme was the Principal Civil Service Pension Scheme (PCSPS), which is divided into a few different sections – classic, premium, and classic plus provide benefits on a final salary basis, whilst nuvos provides benefits on a career average basis. From 1 April 2015 a new pension scheme for civil servants was introduced – the Civil Servants and Others Pension Scheme or alpha, which provides benefits on a career average basis. All newly appointed civil servants, and the majority of those already in service, joined the new scheme.

The PCSPS and alpha are unfunded statutory schemes. Employees and employers make contributions (employee contributions range between 4.6% and 8.05%, depending on salary). The balance of the cost of benefits in payment is met by monies voted by Parliament each year. Pensions in payment are increased annually in line with the Pensions Increase legislation. Instead of the defined benefit arrangements, employees may opt for a defined contribution pension with an employer contribution, the partnership pension account.

In alpha, pension builds up at a rate of 2.32% of pensionable earnings each year, and the total amount accrued is adjusted annually in line with a rate set by HM Treasury. Members may opt to give up (commute) pension for a lump sum up to the limits set by

the Finance Act 2004. All members who switched to alpha from the PCSPS had their PCSPS benefits 'banked', with those with earlier benefits in one of the final salary sections of the PCSPS having those benefits based on their final salary when they leave alpha.

The accrued pensions shown in this report are the pension the member is entitled to receive when they reach normal pension age, or immediately on ceasing to be an active member of the scheme if they are already at or over normal pension age. Normal pension age is 60 for members of classic, premium, and classic plus, 65 for members of nuvos, and the higher of 65 or State Pension Age for members of alpha. The pension figures in this report show pension earned in PCSPS or alpha – as appropriate. Where a member has benefits in both the PCSPS and alpha, the figures show the combined value of their benefits in the two schemes but note that the constituent parts of that pension may be payable from different ages.

When the Government introduced new public service pension schemes in 2015, there were transitional arrangements which treated existing scheme members differently based on their age. Older members of the PCSPS remained in that scheme, rather than moving to alpha. In 2018, the Court of Appeal found that the transitional arrangements in the public service pension schemes unlawfully discriminated against younger members (the "McCloud judgment").

As a result, steps are being taken to remedy those 2015 reforms, making the pension scheme provisions fair to all members. The Public Service Pensions Remedy²¹ is made up of two parts. The first part closed the PCSPS on 31 March 2022, with all active members becoming members of alpha from 1 April 2022. The second part removes the age discrimination for the remedy period, between 1 April 2015 and 31 March 2022, by moving the membership of eligible members during this period back into the PCSPS on 1 October 2023.

²¹ www.gov.uk/government/collections/how-the-public-service-pension-remedy-affects-your-pension

The accrued pension benefits, Cash Equivalent Transfer Value and single total figure of remuneration reported for any individual affected by the Public Service Pensions Remedy have been calculated based on their inclusion in the PCSPS for the period between 1 April 2015 and 31 March 2022, following the McCloud judgment. The Public Service Pensions Remedy applies to individuals that were members, or eligible to be members, of a public service pension scheme on 31 March 2012 and were members of a public service pension scheme between 1 April 2015 and 31 March 2022. The basis for the calculation reflects the legal position that impacted members have been rolled back into the PCSPS for the remedy period and that this will apply unless the member actively exercises their entitlement on retirement to decide instead to receive benefits calculated under the terms of the alpha scheme for the period from 1 April 2015 to 31 March 2022.

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 figures include the value of any pension benefit in another scheme or arrangement which the member has transferred to the Civil Service pension arrangements. They also include any additional pension benefit accrued to the member as a result of their buying additional pension benefits at their own cost.

CETVs are worked out in accordance with The Occupational Pension Schemes (Transfer Values) (Amendment) Regulations 2008 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.

Staff Report

Staff and Commissioner numbers and related costs (audited information)

| | 2024-25 total | Commissioners | Other Staff Costs | Permanently Employed and inward seconded staff | 2023-24 total |
|-----------------------|------------------|---------------|----------------------|---|------------------|
| | £ | £ | £ | £ | £ |
| Wages and salaries | 212,032 | 52,500 | 22,657 | 136,875 | 203,119 |
| Social security costs | 18,735 | 2,494 | | 16,241 | 20,135 |
| Other pension costs | 39,526 | - | | 39,526 | 42,294 |
| Total Staff Costs | 270,293 | 54,994 | 22,657 | 192,642 | 265,548 |

Past and present employees of the Commission are covered by the provisions of the Principal Civil Service Pension Scheme (PCSPS), the PCSPS (NI), the Civil Service and Others Pension Scheme (CSOPS) and CSOPS (NI). These are unfunded multi-employer defined benefit schemes, but the Commission is unable to identify its share of the underlying assets and liabilities.

Full actuarial valuations of both the PCSPs and PCSPS (NI) were carried out as at 31 March 2020 Details can be found in the resource accounts of the Cabinet Office: Civil Superannuation Account (https://www.civilservicepensionscheme.org.uk/knowledge-centre/resource-accounts/). Details of the PCSPS (NI) are available in the PCSPS (NI) resource accounts.

For 2024-25, employers' contributions of £39,526 (2023-24 £42,294) were payable to PCSPS in the range 28.97% of pensionable earnings, based on salary bands for Civil Service Pension.

The Scheme Actuary reviews employer contributions usually every four years following a full scheme valuation. The contribution rates are set to meet the cost of the benefits accruing during 2024-25 to be paid when the member retires and not the benefits paid during this period to existing pensioners.

Employees can opt to open a partnership pension account, a stakeholder pension with an employer contribution. No employee opted to participate in the partnership pension in 2024-25.

Average number of persons employed (audited information)

The average number of whole-time equivalent persons employed during the period was as follows:

| | 2024-25 | | | | 2023-24 |
|----------------------|---------|---------------|--|-------|---------|
| | Total | Commissioners | Permanently Employed and inward seconded staff | Other | Total |
| Directly employed | 5 | 3 | 2 | | 6 |
| Other | 1 | | | 1 | |
| Total | 6 | 3 | 2 | 1 | 6 |

The UK Secretariat had two staff in post over the year, including one senior civil servant (SCS1) and agency staff member included as other. The Commission does not employ staff directly and the UK Secretariat staff are seconded from the UK Civil Service. As the Commission does not have its own Human Resources or pay policies the UK Secretariat staff comply with, and come under the terms of, the policies and practice of their parent Civil Service departments including in relation to attendance management, performance management, requirements to make reasonable adjustments for staff with disabilities, and health and safety. The staff are able to avail themselves of training, career development and promotion within their parent departments.

The Commission does not publish data about staff turnover, sickness absence or composition (including diversity and inclusion statistics) due to the size of the organisation.

The Commissioners are expected to commit approximately 35 days per year to Commission business.

Reporting of Civil Service and other compensation schemes – exit packages (audited information)

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

Reporting of Civil Service and other compensation schemes – payments for loss of office (audited information)

There were no payments for loss of office in 2024-25 (nil in 2023-24).

Reporting of expenditure on consultancy and temporary staff

There was no consultancy expenditure in 2024-25 (nil in 2023-24). The Commission incurred £22,657 in relation to the provision of temporary staff (nil in 2023-24).

Reporting of off-payroll engagements

There was no highly paid off-payroll worker enagagements as at 31 March 2025 (nil 2023-24).

Niamh Ó Maolain

UK Joint Secretary & Accounting Officer

24 June 2025

Parliamentary Accountability and Audit Report

Parliamentary Accountability Disclosures

1. Regularity of expenditure (audited information)

All expenditure was applied to the purpose intended by Parliament.

2. Losses and special payments (audited information)

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

3. Remote Contingent Liabilities (audited information)

There are no remote contingent liabilities requiring disclosure (nil in 2023-24).

4. Income in relation to Fees and Charges (audited information)

No fees or charges were collected (nil in 2023-24).

5. Long-term expenditure trends

Figure 1 on page 14 shows the IRC's annual expenditure in the last five years.

6. Use of Government functional standards

As part of our commitment to good governance and continuous improvement, and in line with the Framework Document, the IRC UK Secretariat pays due regard to relevant functional standards proportionate to the size of the organisation and to meet the business needs and priorities. These include finance, commercial and counter fraud, and aspects of other standards (such as Human Resources and security) as required.

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Niamh Ó Maolain, Accounting Officer, 24 June 2025

THE AUDIT REPORT OF THE COMPTROLLER AND AUDITOR GENERAL TO THE HOUSES OF PARLIAMENT

Opinion on financial statements

I have audited the financial statements of the Independent Reporting Commission for the year ended 31 March 2025 in accordance with Article 10 of the September 2016 Agreement between the Government of the United Kingdom of Great Britain and Northern Ireland and the Government of Ireland establishing the Independent Reporting Commission ("the Treaty").

The financial statements comprise the Independent Reporting Commission'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 Reporting Commission's affairs as at 31 March 2025 and its net operating expenditure for the year then ended; and
- have been properly prepared in accordance with Article 10 of the Treaty and the Framework Document agreed between the Independent Reporting Commission and the Northern Ireland Office.

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 report.

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 Reporting Commission 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 Reporting Commission'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 Reporting Commission'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 report.

The going concern basis of accounting for the Independent Reporting Commission is adopted in consideration of the requirements set out in HM Treasury's Government Financial Reporting Manual, which require 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 the information included in the Annual Report, but does not include the financial statements nor my auditor's report 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 report, 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 Article 10 of the Treaty and the Framework Document agreed between the Independent Reporting Commission and the Northern Ireland Office.

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 Article 10 of the Treaty and the Framework Document agreed between the Independent Reporting Commission and the Northern Ireland Office; 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 Reporting Commission and its environment obtained in the course of the audit, I have not identified material misstatements in the Performance Report 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 Reporting Commission 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 the parts of the Remuneration and Staff Report to be audited are not in agreement with the accounting records and returns; or
- the Governance Statement does not reflect compliance with HM Treasury's quidance.

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 Reporting Commission 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 statement to be free from material misstatement, whether due to fraud or error;
- preparing financial statements give a true and fair view and are prepared in accordance with Article 10 of the Treaty and the Framework Document agreed between the Independent Reporting Commission and the Northern Ireland Office;
- preparing the annual report, which includes the Remuneration and Staff Report, in accordance with Article 10 of the Treaty and the Framework Document agreed between the Independent Reporting Commission and the Northern Ireland Office; and
- assessing the Independent Reporting Commission'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 Reporting Commission will not continue to be provided in the future.

Auditor's responsibilities for the audit of the financial statements

My responsibility is to audit and report on the financial statements in accordance with Article 10 of the Treaty.

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 report 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 Reporting Commission's accounting policies key performance indicators and performance incentives.
- inquired of management, the Independent Reporting Commission's head of internal audit and those charged with governance, including obtaining and reviewing supporting documentation relating to the Independent Reporting Commission's policies and procedures on:
 - o identifying, evaluating and complying with laws and regulations;
 - o detecting and responding to the risks of fraud; and
 - the internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations including the Independent Reporting Commission's controls relating to the Independent Reporting Commission's compliance with the Treaty, the Framework Document agreed between the Independent Reporting Commission and the Northern Ireland Office, the Northern Ireland (Stormont Agreement and Implementation Plan) Act 2016 and Managing Public Money;
- inquired of management, the Independent Reporting Commission's head of internal audit and those charged with governance whether:
 - they were aware of any instances of non-compliance with laws and regulations;
 - they had knowledge of any actual, suspected, or alleged fraud;
- discussed with the engagement team 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 Reporting Commission 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 also required to perform specific procedures to respond to the risk of management override.

I obtained an understanding of the Independent Reporting Commission's framework of authority and other legal and regulatory frameworks in which the Independent Reporting Commission 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 Reporting Commission. The key laws and regulations I considered in this context included the Treaty, the Framework Document agreed between the Independent Reporting Commission and the Northern Ireland Office, the Northern Ireland (Stormont Agreement and Implementation Plan) Act 2016, 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 Assurance Committee concerning actual and potential litigation and claims;
- I reviewed minutes of meetings of those charged with governance and the Commission and internal audit reports; 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 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 report.

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.

Gareth Davies

Date: 26 June 2025

Comptroller and Auditor General

National Audit Office

Garett Dais

157-197 Buckingham Palace Road

Victoria

London

SW1W 9SP

Financial Statements

Statement of Comprehensive Net Expenditure

For the Year Ended 31 March 2025

| | | For the Year Ended 31 March 2025 | For the Year Ended 31 March 2024 |
|-----------------------------|------|--|--|
| | Note | £ | £ |
| Expenditure | | | |
| Staff costs | 2 | 270,293 | 265,548 |
| Other expenditure | 3 | 71,058 | 69,423 |
| Total operating expenditure | - | 341,351 | 334,971 |
| | | | |
| Net Operating Expenditure | | 341,351 | 334,971 |

The Independent Reporting Commission has no gains or losses other than Net Operating Expenditure during 2024-25 (2023/24 £nil). There was no other comprehensive income or expenditure during 2024-25 (2023/24 £nil).

All amounts above are in respect of continuing operations.

Statement of Financial Position

As at 31 March 2025

| | | At 31 March 2025 | At 31 March 2024 |
|-------------------------------|------|---------------------|---------------------|
| | Note | £ | £ |
| Current Liabilities | | | |
| Trade and other payables | 5 | (19,393) | (13,440) |
| Total Current Liabilities | _ | | |
| Total Assets less liabilities | _ | (40.202) | (42,440) |
| Total Assets less liabilities | = | (19,393) | (13,440) |
| Taxpayers' Equity | | | |
| General Fund | | (19,393) | (13,440) |
| | _ | (10.000) | (10.110) |
| Total Taxpayers' Equity | = | (19,393) | (13,440) |

The financial statements on pages 66 to 69 were approved by the Commission on 24 June 2025 and were signed on its behalf by:

Signed:

Accounting Officer: Niamh Ó Maolain

Date: 24 June 2025

Statement of Cash flows

For the Year Ended 31 March 2025

| | | For the Year Ended 31 March 2025 | For the Year Ended 31 March 2024 |
|--|------|--|--|
| | Note | £ | £ |
| Cash flows from operating activities | | | |
| Net Operating Expenditure | | (341,351) | (334,971) |
| (Increase)/Decrease in trade and other | | | |
| Receivables | | - | 3,844 |
| Increase/(Decrease) in trade payables | 5 | 5,953 | (1,109) |
| Net cash outflow from operating activities | | (335,398) | (332,236) |
| Cash inflow from financing activities Amounts from sponsor body | | 335,398 | 332,236 |
| Net cash inflow from financing activities | | 335,398 | 332,236 |
| Net increase/(decrease) in cash and cash equivalents in the period | | - | - |
| Cash and cash equivalents at the | | | |
| beginning of the period | | | <u> </u> |
| Cash and cash equivalents at the end of the period | | - | - |

Statement of Changes in Taxpayers' Equity For the Year Ended 31 March 2025

EQUITY NOTE

| | | General Reserve | Total Reserves |
|--|---|-----------------|----------------|
| Changes in taxpayers' equity for 2023-24 | | £ | £ |
| Balance at 31 March 2023 | • | (10,705) | (10,705) |
| Comprehensive Expenditure for the year | - | (334,971) | (334,971) |
| Grant-in-aid from NIO | • | 332,236 | 332,236 |
| Balance at 31 March 2024 | : | (13,440) | (13,440) |
| Changes in taxpayers' equity for 2024-25 | | | |
| Comprehensive Expenditure for the year | • | (341,351) | (341,351) |
| Grant-in-aid from NIO | 6 | 335,398 | 335,398 |
| Balance at 31 March 2025 | : | (19,393) | (19,393) |

NOTES TO THE ACCOUNTS

1. Statement of accounting policies

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 material accounting policies adopted by the Commission are described below. They have been applied consistently in dealing with items that are considered material to the accounts.

Going concern

The accounts have been prepared pursuant to Article 10 of the International Treaty between the UK Government and the Irish Government, and on a going concern basis. The Statement of Financial Position as at 31 March 2025 shows net liabilities of £19,393 (2024: £13,440). The Commission will continue to exist until the Treaty obligations are terminated by mutual agreement between the UK Government and the Irish Government. There is an ongoing commitment to support the work of the Commission until the Treaty obligations are terminated – the NIO has given the Commission no indication that it intends to pursue this course of action at this point in time. As such, the Commission continues to be legally required to produce a Report annually on progress towards ending continuing paramilitary activity connected with Northern Ireland.

The future financing of the Commission's liabilities, in relation to the costs of the UK Secretariat and remuneration of three Commissioners, will continue to be met by the Northern Ireland Office. The Commission's 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 covering the period 2026-29. 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 it has accordingly been considered to adopt a going concern basis for the preparation of the 2024-25 financial statements.

1.1 Accounting convention

These accounts have been prepared for the year commencing 1 April 2024 and ending 31 March 2025 under the historical cost convention. The comparatives stated reflect the financial position for the year ended 31 March 2024.

1.2 Employee Benefits

Past and present employees are covered by the provisions of the Principal Civil Service Pension Scheme (PCSPS), the PCSPS (NI), the Civil Service and Others Pension Scheme (CSOPS) and CSOPS (NI). These defined benefit schemes are unfunded. The Commission recognises the expected cost of these elements on a systematic and rational basis over the period during which it benefits from employees' services by payment to the schemes of the amounts calculated on an accruing basis. Liability for payment of future benefits is a charge on the pension schemes.

In line with the FReM's adaptation of IAS 19, the Commission accounts for the PCSPS as if it were a defined contribution scheme

Further details regarding the above schemes are contained in the Remuneration and Staff Report.

1.3 Contingent liabilities

In addition to contingent liabilities disclosed in accordance with IAS 37 *Provisions, Contingent Liabilities and Contingent Assets* the Commission discloses for Parliamentary reporting and accountability purposes certain statutory and non-statutory contingent liabilities where the likelihood of a transfer of economic benefit is remote, but which have been reported to Parliament in accordance with the requirements of *Managing Public Money*.

Where the time value of money is material, contingent liabilities which are required to be disclosed under IAS 37 are stated at discounted amounts and the amount reported to Parliament separately noted. Contingent liabilities that are not required to be disclosed by IAS 37 are stated at the amounts reported to Parliament.

1.4 Value Added Tax

The Commission is not VAT registered, where VAT is applicable, expenditure is recorded inclusive of VAT.

1.5 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.

The staff remuneration report includes only one senior civil servant. The Commission does not employ staff directly and the UK Secretariat staff are seconded from the UK Civil Service. They therefore comply with, and come under the terms of, the policies and practice of their parent Civil Service departments including in relation to attendance management, performance management, requirement to make reasonable adjustments for staff with disabilities, and health and safety. The staff are able to avail of training, career development and promotion within their parent departments.

1.6 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. We continually evaluate our estimates, assumptions and judgements based on available information and experience. No critical accounting estimates or judgements have been made in this account.

1.7 Accounting standards, interpretations and amendments to published standards adopted in the year ended 31 March 2025

The Commission has reviewed the standards, interpretations and amendments to published standards that became effective during 2024-25.

1.8 Impending application of newly issued accounting standards not yet effective

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

Non-investment asset valuations: In December 2023 HM Treasury released an exposure draft on potential changes to make 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 of assets being held for their 'service potential' and the terms 'specialised/non-specialised' assets are being removed from the FReM.

The Commission does not recognise any assets and no material impact is expected on the financial statements as a result of this standard.

Social benefits: The 2025-26 FReM will include new guidance on accounting for social benefits. Social benefits may be defined as current transfers received by households 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 statements as a result of the revised quidance.

IFRS 17: Insurance Contracts replaces IFRS 4: Insurance Contracts and is to be included in the FReM for mandatory implementation from 2025-26. It establishes the principles for the recognition, measurement, presentation and disclosure of insurance contracts within the scope of this Standard.

The Commission does not issue insurance policies or insurance contracts that meet the definition under IFRS17. No material impact is expected on the financial statements as a result of this standard. IFRS 19 – Subsidiaries without Public Accountability: Disclosures was issued in May 2024 and applies to an annual reporting period beginning on or after 1 January 2027 (but earlier application is permitted) which permits eligible subsidiaries to use IFRS Accounting Standards with reduced disclosures. We will follow any future requirements of the Government Financial Reporting Manual in respect of this new standard.

IFRS 18 – Presentation and Disclosure in Financial Statements was issued in April 2024 and applies to an annual reporting period beginning on or after 1 January 2027 (but earlier application is permitted) in the private sector. The Public Sector implementation date is not yet confirmed. We will follow any future requirements of the Government Financial Reporting Manual in respect of this new standard.

1.9. Analysis of net expenditure by segment

In line with the provisions of IFRS 8, Operating Segments, the Commission does not analyse its net expenditure by operating segments as it has concluded that it has no separately identifiable operating segments. This conclusion is based on the current reporting structure.

1.10 Cash and cash equivalents

The IRC does not operate a bank account in its own name. The Commission authorises NIO to make payments from the NIO bank account on behalf of the Commission, through Account NI, the Northern Ireland Civil Service accounting system. This process creates a notional grant-in-aid from the sponsoring body which is treated as financing by crediting it to the general reserve. See note 6 for further disclosure. These payments must be authorised by the Commission in advance and are treated as funding in the financial statements. Purchasing and payment controls and regular reconciliation of the general ledger accounts provides assurance that only authorised spend is included within the Commission Accounts.

2. Staff costs

| | | For the Year Ended 31 March 2025 | | | | |
|-----------------------|---------|----------------------------------|-------------------------|---|---------|--|
| | Total | Commissioners | Other Staff Costs | Permanently Employed and inward seconded staff | Total | |
| | £ | £ | £ | £ | £ | |
| Wages and salaries | 212,032 | 52,500 | 22,657 | 136,875 | 203,119 | |
| Social security costs | 18,735 | 2,494 | | 16,241 | 20,135 | |
| Other pension costs | 39,526 | - | | 39,526 | 42,294 | |
| Total Staff Costs | 270,293 | 54,994 | 22,657 | 192,642 | 265,548 | |

More detail on staff numbers can be found in the Remuneration and Staff Report (pages 43 to 52).

3. Other expenditure

| | For the Year Ended | For the Year Ended |
|-------------------------------------|--------------------|--------------------|
| | 31 March 2025 | 31 March 2024 |
| | £ | £ |
| Accommodation and Services | 17,030 | 17,537 |
| Audit & Accountancy - Internal | 2,500 | 2,500 |
| Audit - External | 14,400 | 12,000 |
| Foreign Exchange Rate Losses | - | 360 |
| Professional Fees | 18,668 | 15,450 |
| Professional Subscriptions | 40 | 40 |
| Staff Training | - | 139 |
| Publications | 6,058 | 5,991 |
| Postage and Stationery | 424 | 396 |
| Travel, Subsistence and Hospitality | 11,938 | 15,010 |
| | 71,058 | 69,423 |

4. Financial Instruments

As the cash requirements of the Commission are met via the Northern Ireland Office 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 Commission is therefore exposed to little credit, liquidity or market risk.

5. Trade payables and other current liabilities

| Amounts falling due within one year: | For the Year Ended 31 March 2025 £ | For the Year Ended 31 March 2024 £ |
|--------------------------------------|---|---|
| Accruals and deferred income | 19,393 | 13,440 |
| | 19,393 | 13,440 |

6. Notional grant-in-aid

The Commission receives notional grant-in-aid from the Northern Ireland Office as financing. This is due to the Commission not holding cash of its own, with the cash of the Northern Ireland Office used to settle the liabilities as they fall due.

In 2024-25, the grant-in-aid received by the Commission and credited to the general fund was £335,398. In addition to the net expenditure for the year of £341,351, £5,953 was required to fund the in-year settlement of liabilities including balances outstanding at the previous year-end.

7. Related-party transactions

The Commission was established by International Treaty between the UK and Irish Governments. For accounting purposes, the Commission is treated as a Non-Departmental Public Body by the Northern Ireland Office and the UK Joint Secretary is required to report on the funding provided to the Commission by Parliament. The Northern Ireland Office is therefore regarded as a related party and during the year, transactions were conducted with the Northern Ireland Office via Grant-in-Aid funding to the Commission as outlined in the accounts.

8. Contingent Liabilities

The Commission has no contingent liabilities at 31 March 2025 (31 March 2024 £nil).

9. Events after the reporting period

There were no events after the reporting period requiring disclosure.

The Annual Report and Accounts are authorised for issue on the same date as the Comptroller and Auditor General signed the audit certificate.