

NICS Scoping and Assurance Exercise Following the Conviction of Jeffrey Donaldson

Report to the Head of the Civil Service

From:	Jill Minne, Director of People & Organisational Development, on behalf of the Senior Working Group (SWG)
Senior Working Group:	Louise Crilly, Departmental Solicitor and head of the Government Legal Service for Northern Ireland, Jill Minne, Director of People & Organisational Development, and Catherine Shannon, Director of NICS Human Resources, supported by specialist senior HR and communications colleagues.
To:	Head of the Civil Service (HOCS)
Date:	2 September 2026
Subject:	Assurance report on the NICS scoping and assurance exercise following the conviction of Jeffrey Donaldson

Executive Summary

This assurance report provides the Head of the Civil Service with the final position following completion of the NICS scoping and assurance exercise commissioned in response to matters arising from the conviction of Jeffrey Donaldson. The exercise was undertaken to determine whether any relevant NICS-held information or records, staff disclosure, welfare or support matter, referral issue or related concern existed within the defined NICS remit for the period February 2008 to July 2009.

Key findings:

- No information or disclosure relevant to the defined scope of the exercise was received through the confidential route.
- A structured and documented records search identified no relevant NICS-held records.
- No issue was identified requiring statutory referral, further NICS investigation, additional support action, or advice that a separate process was required.
- An independent external critical friend reviewed the report, Terms of Reference and supporting annexes and concluded that the report presents a fair, balanced and

proportionate account of the exercise. The review provided independent constructive challenge but was not an audit or independent verification of the underlying records searches.

Limitations:

The absence of records or disclosures cannot establish that no relevant issue ever existed. The assurance on this exercise is qualified by the passage of time since the relevant period, potential lawful destruction of records, retention and disposal policies, incomplete indexing and archive migration from legacy ICT applications. These constraints are summarised in this report and set out in the limitations log at **Annex E**.

Conclusion and recommendation:

Within its agreed remit, and on a lawful, proportionate and trauma-informed basis, the exercise is complete. HOCS is asked to agree closure of the exercise within its defined remit, subject to secure retention, appropriate access controls and handling of material arising from the exercise and process documents, in accordance with legal, information governance and records management advice.

HOCS is also asked to agree that the core final assurance report should be published in full on the Executive Office website. Annexes should be published where they have been cleared for publication following the necessary legal, information governance, data protection, confidentiality, records management, accessibility and publication checks. Publication would provide a transparent account of the exercise, including its scope, methodology, findings and limitations. Communications accompanying publication should remain factual and should not imply conclusions beyond the defined remit of the exercise.

1. Purpose and Scope

This report provides HOCS with assurance regarding the historical scoping and assurance exercise commissioned following the conviction of Jeffrey Donaldson. The exercise explored whether any NICS-held information or records, staff disclosure, welfare or support matter, referral issue or related concern existed within the NICS remit for the period when Jeffrey Donaldson served as Junior Minister in OFMdFM from February 2008 to July 2009.

The exercise related to current and former NICS staff and NICS-held information. It excluded Parliament Buildings and Assembly Commission matters, while recognising that liaison arrangements with the Assembly Commission were established for any necessary interface.

Under the agreed remit, the exercise was required to set out the governance arrangements, methodology and records searched, limitations, staff contact and support routes, referral and statutory escalation arrangements, data protection, confidentiality and records handling, external and internal assurance input, findings within the limited scope, and recommendations for any further action.

The exercise was intentionally designed as a scoping and assurance review. It did not constitute a public inquiry, criminal, disciplinary or other investigation, nor was it a substitute for any statutory process.

2. Recommendations and Decisions Sought

HOCS is asked to note the work undertaken by the Senior Working Group in accordance with the agreed remit; that no information or disclosure relevant to the defined scope of the exercise was received through the confidential route; that no relevant NICS-held records were identified through the structured records search within the approved methodology and remit; and that no statutory referral, safeguarding action, legal escalation, further investigation, support intervention or separate process was identified as necessary on the basis of the completed exercise.

HOCS is asked to agree that the NICS scoping and assurance exercise may now be closed within its defined remit; that all relevant documentation relating to this exercise, including the source search register, limitations log and related process and assurance records, is retained securely with appropriate access control in accordance with legal, data protection, confidentiality and records management requirements; and that any non-privileged handling lines or summary communications should be restricted to the factual assurance position without implying conclusions beyond the exercise's scope.

HOCS is also asked to agree that the core final assurance report should be published in full on the Executive Office website and that annexes should be published where they have been cleared for publication following the necessary legal, information governance, data

protection, confidentiality, records management, accessibility and publication checks.

Publication would provide transparency about the scope, methodology, findings, limitations and assurance underpinning closure of the exercise; ensure that the outcome is available directly and consistently to staff, former staff, stakeholders and the wider public; and reduce the risk of the findings being understood without the important qualifications and limitations set out in the report.

3. Background and Commissioning Context

The Speaker requested consideration of whether a review should be undertaken concerning the period during which Jeffrey Donaldson served as Junior Minister in OFMdFM from February 2008 to July 2009. The Assembly Commission separately considered matters relating to Parliament Buildings. The NICS remit therefore established a distinct exercise, focused on current and former NICS staff, NICS-held information and records, NICS employment, HR and support responsibilities, and appropriate referral routes.

The exercise was not a wider inquiry or external investigation. Its purpose was to establish whether any material within the NICS remit warranted further action. It was also designed to avoid duplication with, or inappropriate overlap into, the Assembly Commission Review or the responsibilities of other bodies. Any matters falling outside the NICS remit were to be identified and escalated through the agreed governance route, rather than absorbed into this exercise or left unaddressed.

This distinction shaped the design of the exercise. It enabled NICS to act appropriately within its own responsibilities, while ensuring that matters properly falling to another statutory authority, employer, review process or independent body could be directed through the appropriate route.

4. Terms of Reference

The agreed remit required the exercise to determine what, if any, relevant NICS-held information or records existed in relation to the defined period and remit; to establish a safe, confidential and appropriately supported route through which current and former staff could provide information, seek welfare support, raise a concern within the NICS remit, or be

directed to the appropriate HR, welfare or statutory routes; and to ensure that support arrangements were in place for current and former staff.

The agreed remit also required the exercise to identify whether any matter arose that required further action, including legal consideration, statutory referral, safeguarding action, additional staff support, further scoping, possible investigation, or advice to HOCS on whether a separate or different process might be required.

Duplication with, or inappropriate overlap into, the Assembly Commission Review was to be avoided. A controlled liaison arrangement was established to manage any necessary interface. Data protection, confidentiality and secure records handling were integral to the exercise, including lawful basis for processing, handling sensitive personal data, retention arrangements and clear audit trails. The final report was required to state clearly the actions undertaken.

5. Governance and Oversight

The exercise was overseen by a senior working group (SWG) comprising Jill Minne, Director of People and OD; Louise Crilly, Departmental Solicitor and head of the Government Legal Service for Northern Ireland; and Catherine Shannon, Director of NICS HR, with input from senior HR and communications colleagues as required.

The SWG finalised the terms of reference (ToR), approved the records search methodology, established the confidential route, agreed support and referral arrangements, and ensured that confidentiality, data protection and records management arrangements were applied appropriately. The SWG considered emerging issues, escalation requirements and the integration of external assurance and prepared this final assurance report for HOCS consideration.

An independent external critical friend reviewed the final report, Terms of Reference and supporting annexes. On the basis of the material made available to him, he concluded that the report presents a fair, balanced and proportionate account of the exercise, reflects the agreed remit, accurately describes the methodology applied and appropriately qualifies its conclusions. His review provided independent constructive challenge; it did not constitute an audit or independent verification of the underlying records searches.

The governance and assurance arrangements were designed to provide senior oversight, appropriate legal and specialist input, documented decision-making and independent constructive challenge, while recognising that the exercise was a scoping and assurance process and not an investigation or audit.

Controlled liaison arrangements with the Assembly Commission were established to avoid duplication and to manage any necessary interface with the separate Assembly Commission Review. No additional records or information were furnished by the Assembly Commission in response to these liaison arrangements. Equally, no records or information were furnished by NICS to the Assembly Commission under this process.

6. Scope and Exclusions

The exercise covered all current and former NICS staff and all NICS-held information and records relevant to the period February 2008 to July 2009, when Jeffrey Donaldson served as Junior Minister in OFMDFM. The scope included former OFMDFM and DoF HR records, where legally appropriate, welfare referrals, staff support records and OFMDFM private office records. Physical and electronic records, including records held on legacy ICT systems, were mapped and searched as outlined in **Annex D**.

Explicit exclusions were Parliament Buildings and Assembly Commission matters, as these fell within a separate review. Staff outside NICS or records held by other bodies were not in scope. Any information identified during searches that fell outside the NICS remit would have been escalated through the controlled liaison route, rather than brought within this exercise.

7. Records Search Methodology

The SWG approved a structured records search methodology. Source owners were identified and source maps produced. Searches were conducted within defined date ranges from February 2008 to July 2009 using tiered criteria recorded in search plans. All mapped Tier 1 electronic and paper sources identified as relevant and lawfully accessible were searched in accordance with the approved methodology. Sources or information that could not be searched, accessed or provided were recorded as limitations and taken into account in determining the level of assurance that could properly be given.

Detailed search criteria, owner returns, decision logs and a limitations log were maintained. **Annex D** summarises the records search methodology and presents the source mapping through a tiered information source map.

Data protection, confidentiality and information governance requirements were applied throughout the search process. Evidence, including the source search register, search plans, decision logs and all working papers, was compiled and securely retained.

8. Records Search Outcome

All mapped Tier 1 sources were searched within the agreed scope and date range. No relevant NICS-held records were identified. Each mapped and lawfully accessible Tier 1 source searched returned a nil outcome for the period under review, February 2008 to July 2009.

Having considered the Tier 1 returns, the outcome of the confidential contact route, the identified records limitations and the relevant legal and information governance considerations, the SWG concluded that no Tier 2 source had been triggered and that further searches were not necessary or proportionate within the agreed remit. This decision was taken collectively by the SWG by reference to the pre-agreed escalation criteria and was recorded in the decision log. None of the agreed triggers for progression to Tier 2 was met.

Annex E contains a summary of returns from information owners. The absence of records is acknowledged as a limitation of this exercise and is qualified by the constraints summarised in section 11 and set out in **Annex E**. The absence of evidence does not constitute definitive proof of the absence of concern.

9. Staff Contact Route

A confidential telephone helpline and dedicated email route were established, staffed by appropriately briefed HR managers during business hours to ensure trauma-informed handling. The contact route was publicised to current staff via email and intranet, and to former staff via a layered awareness approach comprising staff associations, intranet posting, website notice and trusted third-party communication. The relevant communication material is included at **Annexes B and C**.

The SWG was satisfied that reasonable and proportionate steps had been taken to make current and former staff aware of the opportunity to provide information and to access support.

Support and disclosure contacts were managed confidentially. One call was received through the confidential telephone route; however, the matter raised was unrelated to the exercise and did not fall within its defined scope. No information or disclosure relevant to the defined scope of the exercise was received through the confidential route. The contact was recorded in the confidential log maintained separately from operational records and handled in accordance with the applicable arrangements.

After the exercise has closed, staff will continue to have access to normal HR, welfare and employee support channels. Closure of the dedicated contact route established for this exercise will not affect ongoing access to support. Information handled as part of the exercise will continue to be managed in accordance with the confidentiality, legal privilege and governance arrangements set out in this report.

10. Support Arrangements

During the exercise, NICS staff were signposted to internal support services, including the Employee Assistance Programme, HR policy advice, Occupational Health, Trade Union representatives and existing welfare support. External support sources were also listed, including Victim Support NI, the Rowan Sexual Assault Referral Centre, Rape Crisis NI and domestic abuse services, as detailed in the staff support material at **Annex B**.

Confidentiality and trauma-informed principles were emphasised. Staff were assured that any information provided would be handled sensitively, within legal and confidentiality constraints and without prejudice. HR teams remained available to support colleagues, and signposting to external specialist victim support and counselling services was maintained.

Employee counselling, welfare and wider support arrangements will continue beyond closure of the confidential line. The dedicated route established for this exercise was time-limited and specific to the scoping and assurance process. Its closure will not affect staff access to normal HR, welfare, Employee Assistance Programme or other established

support routes. Staff will continue to have access to information and signposting through the Employee Health and Wellbeing page on the intranet and through the range of HR policies currently in place, including routes for raising concerns and accessing confidential support where appropriate. A list of external agencies and their contact details remains accessible via the intranet, as appropriate, on a voluntary and anonymous basis.

11. Overall Assurance, Findings and Limitations

The central assurance question for HOCS is whether the exercise was completed properly, what was found, what limitations apply, the extent of assurance that can be provided, and the decision and next steps now required.

No NICS-held information or records relevant to the defined scope of the exercise were identified through the structured records search, and no relevant information or disclosure was received through the confidential route. The unrelated contact received through the confidential route did not give rise to any requirement for statutory escalation or other action under the exercise.

Throughout the exercise, no issue was identified that required referral to the PSNI or an HSCT, disciplinary investigation, or any other statutory or regulatory process. Consequently, no formal escalation was necessary or undertaken under the Assembly (Northern Ireland) Act 2012, the 2019 Act, or any other applicable jurisdictional requirement.

An independent external critical friend reviewed the final report, Terms of Reference and supporting annexes. On the basis of the material made available to him, he concluded that the report presents a fair, balanced and proportionate account of the exercise, reflects the agreed remit, accurately describes the methodology applied and appropriately qualifies its conclusions. His review provided independent constructive challenge; it did not constitute an audit or independent verification of the underlying records searches.

The assurance provided is qualified by the limitations set out in this report and **Annex E**. The period under review is subject to relevant retention and disposal schedules; records may have been lawfully destroyed. Legacy ICT systems were not fully migrated and indexing arrangements may be incomplete. Direct access to certain sensitive categories of information, including confidential welfare records, was restricted or the information was not

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searchable. These restrictions were considered in accordance with the applicable legal, confidentiality and information governance requirements, recorded in the limitations log and considered in determining the level of assurance that could properly be provided. Archival records held in off-site storage, secure cabinets or shared drives may have been inaccessible despite best efforts.

These limitations, detailed at **Annex E**, mean that the absence of records or disclosures cannot be treated as proof that no relevant issue ever arose. Nonetheless, within the defined scope and period and subject to these constraints, the records search methodology was applied to each mapped and lawfully accessible Tier 1 source, and each source searched returned a nil outcome.

Taking account of governance oversight, internal review and external critical friend input, structured records searches and the confidential staff contact route established for this exercise, the SWG concludes that:

- a) All required elements of the exercise were addressed methodically and in accordance with agreed governance and legal arrangements.
- b) A structured search of all mapped and lawfully accessible Tier 1 NICS-held record sources for the defined period yielded no relevant material.
- c) No disclosure relevant to the defined scope of the exercise was received, and no statutory referrals were necessary.
- d) An independent external critical friend reviewed the report, Terms of Reference and supporting annexes and concluded that the report presents a fair, balanced and proportionate account of the exercise.
- e) No conflicts of interest were identified among SWG members or the external critical friend.

The SWG therefore provides assurance to HOCS that, based on the exercise undertaken and subject to the limitations set out in this report and **Annex E**, no information, disclosure or NICS-held record was identified within the defined remit that required further investigation, referral or separate action.

12. Conclusion, Closure and Learning

The NICS scoping and assurance exercise has been completed within its defined remit. It was supported by documented governance, legal oversight and input, structured records

methodology, confidential staff contact arrangements, welfare support arrangements and independent external critical-friend review and constructive challenge.

Closure actions:

On agreement by HOCS, the exercise should be formally closed within its defined remit. All records relating to the exercise will be retained securely, with appropriate access controls, in accordance with legal, information governance and records management advice. Any future disposal, destruction or anonymisation of records should be undertaken in line with the DoF Retention and Disposal Policy only with confirmed legal and records management authority.

Subject to HOCS agreement, the next steps would be for HOCS to advise those contacted at the outset of the outcome and closure of the exercise. This should include the Chair of the Committee for the Executive Office, Ministers, the Leader of the Opposition, the Trade Unions contacted at the outset, the Chief Executive of the Northern Ireland Assembly, the NICS Board and the Speaker of the House of Commons. HOCS should also respond to the Speaker of the Northern Ireland Assembly to advise directly of the outcome of the exercise, further to the Speaker's original request that consideration be given to a review.

Subject to HOCS agreement, the core final assurance report should be published in full on the Executive Office website. Annexes should be published where they have been cleared for publication following the necessary legal, information governance, data protection, confidentiality, records management, accessibility and publication checks. Those notified or contacted at the outset should, where practicable, receive an advance embargoed copy shortly before publication. This will allow them to be informed directly of the outcome while ensuring that the same complete and appropriately qualified account is then available publicly.

HOCS should also advise current staff that the exercise has closed, while making clear that any current or former member of staff who has experienced an issue, or who wishes to raise a concern or seek support, may continue to use the established reporting and support routes. The published report should be accompanied by a short Executive Office website

notice confirming closure of the exercise and providing continuing support and reporting information for former staff.

Policy and operational context:

The scoping exercise was conducted with reference to the policy and support arrangements relevant to conduct, grievance, discipline, welfare, confidentiality and staff support. For the historical period in scope, the principal internal policies in place included the NICS Standards of Conduct, Discipline, Grievance and Dignity at Work.

The policy and support landscape has developed materially since the historical period covered by the exercise. It includes a NICS Raising Concerns Framework, revised Dignity at Work provisions, which are now included within the Standards of Conduct policy to reinforce the importance of appropriate and respectful behaviours in the workplace, the Sexual and Domestic Abuse policy and supporting arrangements including Safe Place Advocates, and clearer internal communications and signposting to welfare and employee support routes.

These developments provide clearer routes for staff to raise concerns, access confidential support and understand where to seek advice or support if a serious concern arises, including where a concern relates to a Ministerial or Junior Ministerial office, subject to the scope and application of the relevant policy.

The exercise identified no specific policy action necessary for the purpose of closing this exercise. This does not replace the normal ongoing review and improvement of relevant policies, reporting routes and support arrangements. These policies should continue to be kept under review and kept up to date, and the importance of these arrangements should continue to be communicated to staff.

Ongoing support:

Confidential support routes and welfare services for staff remain available via standard HR and Employee Assistance Programme channels. The specialised confidential route will close in line with the closure of this exercise, but support signposting to internal and external welfare providers will remain accessible on the NICS intranet and through HR representatives.

Recording and learning:

A record of the relevant correspondence and documentation will be retained for future reference. This will include learning from the exercise in relation to search methodology, governance, staff communications, contact routes, support arrangements, evidence management and signposting. In particular, the record will capture learning relevant to the handling of historical safeguarding concerns, engagement with former staff groups and the identification and management of records limitations in long-running retrospective exercises. This learning may assist the design and handling of any future assurance exercise or response to serious concerns. This learning is procedural and does not imply that the exercise identified an underlying policy or operational failure.

Approval

The Head of the Civil Service approved the closure of the exercise and publication of this report on 3 September 2026.

Annexes A-E

Annex	Material	Publication status
Annex A (attached separately)	Terms of Reference	Published with the core report
Annex B (attached separately)	Current staff communication and support notice	Published with the core report
Annex C (see link)	Former staff communication and awareness material Notice to former Northern Ireland Civil Service staff The Executive Office	Publicly available through the link provided
Annex D (attached separately)	Tiered information source map	Published with the core report
Annex E (attached separately)	Summary of returns from information owners and limitations log	Published with the core report