

INDEPENDENT REVIEW OF THE NORTHERN IRELAND HUMAN RIGHTS COMMISSION

REPORT OF THE LEAD REVIEWER
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Executive Summary

The Northern Ireland Human Rights Commission (NIHRC) is the national human rights institution (NHRI) for Northern Ireland. It is a Non-Departmental Public Body (NDPB) sponsored by the UK Government Department, the Northern Ireland Office (NIO). The NIHRC was established under the Belfast (Good Friday) Agreement and its responsibilities are set out in Part 7 of the Northern Ireland Act 1998.

The NIHRC requested a review of its ability to fulfil its statutory functions, on the basis that they were concerned they could not do so. The NIO and the NIHRC therefore agreed in summer 2022 to conduct an external review of the NIHRC's delivery of statutory functions; efficiency; effectiveness; and value for money, with a specific focus on the organisation's budget and whether or not it enables the NIHRC to discharge its statutory duties successfully.

The NIO Permanent Secretary and the Secretary of State for Northern Ireland, recognising the statutory functions fulfilled by the NIHRC and the important role it plays in protecting rights in Northern Ireland, agreed that a review should be set up.

The NIHRC's request for a review came in the context of the decision by the Global Alliance of National Human Rights Institutions (GANHRI) Sub-Committee on Accreditation (SCA) decision, in late 2021, to defer on re-accreditation of the NIHRC as an 'A' status National Human Rights Institution. This was due in part to concerns around the level of funding the NIHRC receives.

This review is following the guidance of the Cabinet Office's new Public Bodies Review Programme, launched in April 2022. This policy requires all ALBs to be reviewed between 2022-2025. Considering the requirement to carry out this review, and the NIHRC's request, the NIO's ministers agreed to prioritise this review so that it could commence in 2022. This prioritisation reflected the important statutory functions that the NIHRC has to protect rights in Northern Ireland

Scope of the Review

As lead reviewer, I have been asked to deliver on a Terms of Reference agreed by the NIO and the NIHRC. To reach conclusions and offer strategic recommendations, the Terms of Reference instructed me to look at the **Economic model and sustainability; Form; and Effectiveness and future function of the NIHRC**.¹ The structure of this Executive Summary, and the main body of the report, is organised according to this scope. The scope of the review excludes: management of day-to-day NIHRC finances; any detailed financial or economic modelling of future options; and the adequacy of the NIHRC's duties, functions and powers.

¹ Full Terms of Reference (ToR), including definitions of this scope, can be found at Annex C.

Conclusions and recommendations

Key conclusions

The Review's full list of recommendations are set out in this section, and in a table at Annex A. The key recommendations are based around the review's two main findings: the **budget of the NIHRC is currently inadequate and restricting its ability to deliver its statutory duties** and that the **organisation could better manage its operations in some areas to improve efficiency and effectiveness**.

I therefore recommend commitments from the Government, alongside a package of reforms to enable the NIHRC to make its current funding go further while maintaining its operational and functional independence, and recommendations to the NIHRC to improve its efficiency and performance as an organisation.

I am satisfied that these recommendations offer a positive new direction, and a positive response from all parties to the key issues raised in the GANHRI SCA report on its deferral of the NIHRC's 'A' status. I expect this report to provide a basis for more productive working between the NIHRC and the sponsor department, with a recognition that it is a complex picture which will only be improved by concessions and commitment on both sides.

I have grouped conclusions and recommendations according to the scope provided in the Terms of Reference, and indicated to which body or bodies the recommendation is directed.² In order to understand the full context of the recommendations within the Executive Summary it is important to consider the main body of the report.

² This review recognises that while the NIO is the Government department which sponsors the NIHRC, some of the recommendations will require agreement and engagement across multiple Government departments. Therefore I have labelled some recommendations to Government as a whole, and some specifically to the NIO.

Economic model and sustainability: conclusions

Core budget and delivery of statutory mandate

This review has found that the NIHRC is struggling to fulfil its statutory mandate in 2022/23 with the core budget available. This review has identified three parts of the organisation's statutory mandate for which delivery cannot currently be considered fully successful, these are: the duty that they shall promote understanding and awareness of the importance of human rights in Northern Ireland; investigatory powers; and legal assistance powers. I am particularly concerned about the budget pressure resulting in a failure to deliver on promoting understanding and awareness of human rights.

Part 7 of the Northern Ireland 1998 states that the NIHRC **shall** promote understanding and awareness of Human Rights in Northern Ireland, thereby creating a mandatory duty that must be complied with. At present, this is not happening. There is no dedicated member of staff focused on education, and the NIHRC repeatedly turns down requests from different sectors in Northern Ireland to provide training. In addition, the NIHRC has been unable to deliver communications work to support the awareness raising element of this duty.

Other duties, including keeping under review the adequacy and effectiveness in Northern Ireland of law and practice relating to the protection of human rights, are currently being delivered successfully due to prioritisation by the NIHRC.

Core budget going forward

This review has found vastly differing expectations from the NIHRC and the NIO sponsor unit on what is a realistic budget uplift request, which is causing tension in the relationship. Put simply, the NIHRC believes the budget it needs far exceeds its current allocation, and the NIO sponsor unit does not believe that the Government would support any major uplift and believe they lack the evidence to advocate on the NIHRC's behalf.

It is beyond the remit of this review to offer detailed future economic modelling, however the review does ask me to assess sustainability and fitness for purpose. I believe the organisation cannot be sustainable going forward without the question of a budget baseline being settled, or at least a level of mutual agreement reached.

Dedicated Mechanism Budget

The Dedicated Mechanism (DM) function of the NIHRC is vital in ensuring no diminution of rights as the UK exits the European Union, and this function has been

funded appropriately. However, this is provided as a ring fenced budget which cannot be used for other duties of the NIHRC without justification. This review has found that the ring fencing of the DM budget is causing significant frustration at all levels at the NIHRC, and inhibits its independence by preventing the organisation from using its own judgement in deciding how to use all of its funding.

Budget and legal powers

This review has concluded that the NIHRC must develop a more strategic approach to litigation in order to ensure efficiency and best use of resources. Stakeholders expressed their view that legal strategy was simply demand driven and separate from community concerns, and some noted that the commission doesn't routinely re-assess its involvement in cases. The review team also notes that this is a discretionary statutory function, and as such a strategic approach is appropriate.

Notwithstanding the need for a more strategic approach to litigation, the review has identified that the NIHRC does carry significant costs and liabilities in cases that it deems essential to progress, which is making sustainable budgeting difficult. Such cases include defensive action when cases are taken against the NIHRC, or other strategic cases where the NIHRC believes its involvement is vital for the progression of Human Rights law.

Economic model and sustainability: recommendations

- ***Recommendation 1: budget uplift. Recommendation to Government***

I recommend that the NIHRC's core budget be increased for the next financial year, so that the NIHRC can deliver its statutory mandate. A budget uplift for next year will keep the organisation stable, enable some funding to be made available for education and training to deliver on this duty, and send a clear message that the Government is committed to the NIHRC's statutory mandate.

I believe that the information and findings presented in this report, and the potential advantages from implementation of the other recommendations in this report, will be useful for both the NIHRC and NIO in advocating for this budget uplift in the next financial year.

- ***Recommendation 2: comprehensive budget review to establish a baseline budget. Recommendation to Government***

I recommend that the Government should consider following the example set in the 2012 Comprehensive Budget Review of the Equality and Human Rights Commission

(EHRC).³ This was completed by a cross-Government review team and arrived at a minimum budget baseline figure which continues to act as the EHRC's baseline today. Embarking on this review should signal to the NIHRC and international community the Government's intention to fund the NIHRC appropriately.

In order to secure cross-Government buy-in, I believe such a review should include senior figures at the NIO, the NIHRC, the Cabinet Office (due to its sponsorship experience with the EHRC and experience of the previous comprehensive budget review) and representative(s) of other Government bodies.

- **Recommendation 3: NIHRC permitted to use Dedicated Mechanism funding more flexibly.** *Recommendation to Government*

The ring fencing of the DM budget should end, with the NIHRC provided with greater freedom to use this funding across the organisation. This will strengthen the NIHRC's independence, and also open the door to more efficient use of funding and synergy in various activities, because money which was previously reserved for DM can now be used across the organisation.

I note the risk that if the DM and Core budgets are provided together, the current level of DM funding may not be protected. For this recommendation to be effective, the DM budget should be maintained at its current level and protected going forward.

- **Recommendation 4: a more strategic approach to litigation.** *Recommendation to the NIHRC*

I recommend the NIHRC develop a more strategic approach to litigation. On the evidence of stakeholders, I recommend this should include:

- Frequent reassessment of its role in legal proceedings, including considering whether or not any other organisation could play its role.
- Closer engagement with other similar bodies in Northern Ireland to ensure no duplication of resources.
- Use of in-house resources as standard, with decisions to seek outside legal assistance made on a case by case basis.

I also recommend that the NIHRC enhance its legal intervention matrix and consider developing an organisation wide litigation strategy. This should be an internal document to identify the different levels of intervention the NIHRC can be involved in on a legal case, with ranges of associated costs and liabilities. There should be an agreed criteria for each level of involvement, and criteria for progression between

³ Comprehensive Budget Review of the Equality and Human Rights Commission, 2012, Gov.uk

different levels of intervention. This document should be consulted every time legal intervention is being considered, and reviewed annually.

- **Recommendation 5: Government to explore options for legal indemnity for certain NIHRC litigation, particularly defensive action.**

Recommendation to Government

This review concludes that the NIHRC should be protected against spiralling costs when a case, for which its involvement is vital and could progress areas of human rights law, is increasing in costs which could put other NIHRC duties at risk. This report, as the UK Parliament Women and Equalities committee has recommended in the case of the EHRC, recommends that the Government explore introducing a scheme to indemnify the NIHRC against the risk of high costs for defensive cases or other cases where the NIHRC involvement is vital but costs are prohibitive.⁴

Such a scheme would have to be carefully considered, with decisions on indemnity taken on a case by case basis, by a committee of officials and legal professionals outwith the case at hand.

A further aspect of a Government scheme could include a UK Government policy decision that governmental defendants on cases taken by the NIHRC do not seek costs if the NIHRC loses the case.

⁴ House of Commons Women & Equalities Committee, *Enforcing the Equality Act: the law and the role of the Equality and Human Rights Commission* (2019), p. 30

Form: conclusions

Staff complement

The NIHRC's core staff will reduce to a total of 12 for the 2023/24 financial year. The review concludes that it is clear the NIHRC is working with a very low staff complement - **and therefore emphasises the need for recommendations 1 and 2 on budget to be actioned**. The review identifies two areas for recommendations on form: pay policy, as this impacts on grading and staff structure; and sponsorship model which affects the overall form and role of the organisation.

Pay policy

The NIHRC have significant concerns about the pay policy they operate within, and would like to see change. At present, the NIHRC is aligned to Northern Ireland Civil Service (NICS) pay policy. The NIHRC's leadership cited a number of issues with this in terms of their ability for flexibility with grading, and the fact that because they are not a NI Government department, they do not have voice in pay negotiations.

Sponsor relationship

This review has found that the form of the NIHRC's sponsor relationship, as outlined in its founding statute, does not meet international best practice for NHRIs. This is because the NIHRC is sponsored by a Government department and therefore reports to the Executive, whereas the United Nations High Commissioner for Human Rights (OHCHR) international human rights accords, including the Paris Principles, emphasise the importance of independence from Government.⁵ The Belgrade Principles, from 2012, cite that NHRIs should be directly accountable to Parliament.⁶ This is the current form of the Scottish Human Rights Commission and the Irish Human Rights and Equality Commission, and these stakeholders indicated that this sponsorship strengthens the independence and separation from Government of their organisation, something which this review found to be opaque in perceptions of the NIHRC.

Form: recommendations

- **Recommendation 6: Explore a new pay policy for the NIHRC.**
Recommendation to the NIO and the NIHRC

⁵ UN General Assembly resolution 48/134 (the 'Paris Principles') on National Human Rights Institutions (NHRI).

⁶ UN Annual report of the United Nations High Commissioner for Human Rights and reports of the Office of the High Commissioner and the Secretary-General, May 2012, p. 17.

The NIO should work with the NIHRC and other Government departments to explore the benefits of a change to the NIHRC's pay policy. This work should identify whether or not this would allow the NIHRC to improve recruitment and retention of staff and therefore deliver its mandate in a more efficient and effective manner. This could include consideration of aligning policy with the other UK Government sponsored NHRI, the Equality and Human Rights Commission (EHRC).

- **Recommendation 7: Consideration of revised sponsorship arrangements.** *Recommendation to Government*

It is beyond the remit of this review to conclusively say that a different sponsorship relationship for the NIHRC is essential, and I also note any changes would involve amendments to legislation. However, this issue was mentioned throughout our engagement and this review therefore recommends that the Government establish a workstream to explore the sponsorship arrangements of the NIHRC and identify if this model is working in terms of NHRI independence and effectiveness.

Effectiveness and future function: conclusions

Financial management

Government stakeholders consistently cited a frustration with the NIHRC over its processes around financial management. The review team believes that this affects the view of the NIO when the NIHRC escalates its budgetary concerns. The review team also identified that best practice was not always followed by both sides in terms of governance around financial monitoring, including the tracking of issues and capturing notes, and that joint working on finance is hampered by the NIHRC not being on the NIO's finance system (which the other NIO NDPBs can access).

Performance management and governance

The review team found that performance management information developed by the NIHRC does not always mirror the picture of the organisation's performance as described by stakeholders, and that some activities are tracked in broad terms without the focus of Key Performance Indicators (KPIs). The review team also identified issues of information flow internally in the NIHRC, with some senior leaders not always receiving information required for decision making.

Relationships

An important element of the effectiveness of any NHRI is its relationship with its sponsor. At present this relationship requires improvement to secure the future function of the NIHRC.

There is a general lack of trust and lack of information sharing, and this includes a perception by the NIHRC that the sponsor team is unwilling to engage in detailed consideration of potential budget uplifts. The relationship is guarded, and I would characterise this as a 'Us and Them' relationship, not a mature working relationship between a Government department and independent NHRI.

Effectiveness and future function: recommendations

- **Recommendation 8: Improved financial governance processes between the NIO and the NIHRC.** *Recommendation to the NIHRC and the NIO*

The NIO and the NIHRC must professionalise their regular engagement, particularly on finance:

- Meetings should always be minuted and actions tracked.

- The NIHRC finance function should improve their transparency and work with the NIO who can act as a ‘critical friend’ involved in discussions, to solve problems upstream and prevent escalation.
- The NIHRC must ensure requested accounting information is delivered to the NIO by required deadlines.
- The NIO should explore if the NIHRC can join the NIO’s finance system, Account NI, which other NIO NDPBs are currently operating within.
- **Recommendation 9: Improved NIHRC performance management and governance.** *Recommendation to the NIHRC*

The NIHRC must improve its performance management. This means including better, more focused, better targeted, more useful, and more informative Key Performance Indicators (KPIs) and metrics in its business plan to effectively monitor performance. Improvements should generate data which can then be used by the NIO to advocate on behalf of the NIHRC in Government.

Updated and improved KPIs should be developed in accordance with current capacity pressures on the NIHRC, to avoid targets being defined which subsequently cannot be met.

The NIHRC must also ensure an effective flow of information to commissioners and the NIHRC’s Audit and Risk Committee, to ensure the experience and expertise of these bodies are well utilised.

- **Recommendation 10: joint actions to improve relationship.** *Recommendation to the NIHRC and the NIO*

This review recommends the following actions to improve the NIHRC-NIO relationship:

- The NIO must put more effort into ensuring its Ministers engage with the NIHRC Chief Commissioner and these meetings should be regularised.
- Both parties must recognise that UK Government fiscal policy is set by political leadership and therefore should work on budgetary matters together with a pragmatic awareness of this reality.
- The NIO and the NIHRC should commit to a ‘no surprises’ culture in the framework document.
- The NIHRC and the NIO sponsor team should consider engaging in relationship building exercises, potentially externally facilitated, to help them understand each other’s position.

Annex A: Recommendations and implementation checklist

No.	Theme	Recommendation	Implementation responsibility ¹⁸	Six month update	Twelve month update
1.	Economic model and sustainability	Budget uplift	Government		
2.	Economic model and sustainability	Comprehensive budget review to establish a baseline budget	Government		
3.	Economic model and sustainability	The NIHRC permitted to use Dedicated Mechanism funding more flexibly	Government		
4.	Economic model and sustainability	A more strategic approach to litigation	NIHRC		
5.	Economic model and sustainability	Government to explore legal indemnity scheme for certain NIHRC litigation, particularly defensive action	Government		
6.	Form	Explore a new pay policy for the NIHRC	NIO and NIHRC		
7.	Form	Consideration of revised sponsorship arrangements	Government		
8.	Effectiveness and future function	Improved financial governance processes between NIO and NIHRC	NIO and NIHRC		

¹⁸ This review recognises that while the NIO is the Government department which sponsors the NIHRC, some of the recommendations will require agreement and engagement across multiple Government departments. Therefore I have labelled some recommendations to Government as a whole, and some specifically to the NIO.

9.	Effectiveness and future function	Improved NIHRC performance management	NIHRC		
10.	Effectiveness and future function	Joint actions to improve relationship	NIO and NIHRC		

Annex B: List of stakeholder organisations who participated in research

The review team spoke to individuals and groups from the following organisations:

- Northern Ireland Office (NIO)
- Northern Ireland Human Rights Commission (NIHRC)
- Scottish Human Rights Commission (SHRC)
- Irish Human Rights and Equality Commission (IHREC)
- Equality and Human Rights Commission (EHRC)
- National Audit Office (NAO)
- Equality Commission for Northern Ireland (ECNI)
- Electoral Office of Northern Ireland (EONI)
- Committee on the Administration of Justice Northern Ireland
- Amnesty International Northern Ireland
- Women's Policy Group NI
- Equality Coalition Northern Ireland
- Northern Ireland Humanists
- Disability Action NI
- Public Interest Law Society Northern Ireland (PILS)

Annex C: Terms of Reference

Independent Review - Northern Ireland Human Rights Commission

Summary

1. The Northern Ireland Office (NIO) is the sponsor department for the Northern Ireland Human Rights Commission (NIHRC). The NIHRC operates as a Non-Departmental Public Body.
2. Both organisations have agreed in principle to commission an external review of NIHRC's statutory functions, efficiency, effectiveness and value for money, with a specific focus on the organisation's budget (staffing, programme resources and running costs). The aim is to ensure the NIHRC can continue to appropriately fulfil its statutory duties and exercise its powers as set out in Part VII of the Northern Ireland Act 1998, Section 5(6)c of the Northern Ireland (Ministers, Elections and Petitions of Concern) Bill 2021 and Schedule 3 of the EU (Withdrawal Agreement) Act 2020. This review will consider whether the NIHRC budget allows it to discharge these successfully. This document sets out further detail about what factors are within, and out of scope in this review.
3. The NIHRC duties and powers primarily affected and within scope of this review are those set in Part VII of the Northern Ireland Act 1998, Section 5(6)c of the Northern Ireland (Ministers, Elections and Petitions of Concern) Bill 2021 and Schedule 3 of the EU (Withdrawal Agreement) Act 2020:
 - Keeping under review the adequacy and effectiveness in Northern Ireland of law and practice relating to the protection of human rights;
 - Advising the Secretary of State and the Northern Ireland Executive of legislative and other measures which ought to be taken to protect human rights—as soon as reasonably practicable after receipt of a general or specific request for advice; and on such other occasions as the Commission thinks appropriate;
 - Advising the Northern Ireland Assembly whether legislative Bills are compatible with human rights;
 - Providing advice to the UK government and Westminster Parliament on matters affecting human rights in NI;
 - Conducting investigations on systemic human rights issues, including entering places of detention, and compelling individuals and agencies to give oral testimony or to produce documents;
 - Promoting understanding and awareness of the importance of human rights in Northern Ireland;
 - Providing legal assistance to individuals and initiating strategic cases, including own motion legal challenges;

- Monitoring the implementation of international human rights treaties and reporting to the United Nations and Council of Europe;
- Working in partnership with the Irish Human Rights and Equality Commission as mandated through the joint committee created in accordance with the Belfast (Good Friday) Agreement;
- Promoting, protecting and monitoring implementation of the United Nations Convention on the Rights of Disabled Persons, as part of the UK designated independent Mechanism;
- Monitoring, advising, reporting on and enforcing the Article 2 commitment within the Northern Ireland Protocol and reporting to the Government and the Executive Office in Northern Ireland in this regard.

Objectives of the review

4. This review will focus on:

- Assessing sustainability and fitness for purpose;
- Addressing whether recommendations made by the sub-accreditation committee of the Global Alliance of National Human Rights Institutions could be met by NIHRC;
- Assessing capacity for delivering more effectively and efficiently, including identifying the potential for further efficiency savings if any;
- Ensuring organisational design is robust enough to meet any future challenges;
- Reviewing the current sponsorship model to consider whether there are more effective models that could provide greater flexibility in sharing services and other non-statutory functions with other organisations working in this sphere;
- Assessing the performance of NIHRC and/or assurance that processes are in place for making such assessments, for example examining relevant ways that the board of Commissioners does and may in the future monitor strategic outcomes and objectives;
- Reviewing control and governance arrangements to ensure that the NIHRC and the NIO are complying with recognised principles of good corporate governance.

Scope

5. A review of the NIHRC will begin in August 2022 and is expected to report back before the end of October 2022.
6. The review will be proportionate to the NIHRC's size and specialised nature. It will cover a review of those NIHRC's duties and powers within scope as well as the ability of the NIHRC to fulfil these. These duties are primarily in the context of the Northern Ireland Act 1998, which provides the legal governance of the

organisation and the core functions for which the NIHRC exists, and compliance with the UN General Assembly in 1993 Resolution A/RES/48/134 (the UN Paris Principles relating to the Status of National Institutions), including any related observations or recommendations of the sub-accreditation committee of the Global Alliance of National Human Rights Institutions.

7. The review will look at the current performance of the NIHRC, its structure and how it is able to respond and adapt to those functions which are most likely to affect demand for its services and resource requirements in the future. This will include a comparison with similar bodies and other Rights organisations in the UK and Ireland - the Equality and Human Rights Commission, the Scottish Commission for Human Rights, and the Irish Human Rights and Equality Commission.
8. The review will consider the NIHRC's statutory functions and whether current funding is adequate to undertake these and if any further efficiencies can be made in these undertakings. It will consider any other activities carried out by the NIHRC or planned to be taken forward and whether these are practicable in light of current public finances and within the constraints of wider public sector spending reviews.
9. The review's approach and methodology is set out below.

Issues that are in scope

10. The review will look at the current operational structure, corporate functions and costs, including current and potential use of a shared services model, while having consideration to the impacts of the additional Article 2(1) duties and powers. This will require the consideration of a number of issues including:

Form

- Core staff complement - across the organisation, and the extent to which this provides sufficient resilience.
- Staff structure - whether grading is structured in a way that allows for the delivery of duties and has regard for efficiency and effectiveness.
- A review of the operation of statutory functions to ensure these are still fit for purpose. This will include considering the observations or recommendations of the sub-accreditation committee of the Global Alliance of National Human Rights Institutions.

Economic model and sustainability

- Baseline Budget - whether both the core budget and the budget designed for Article 2(1), (particularly to the extent to which this may impact on the general functioning of the NIHRC) is sufficient to ensure that statutory duties can be complied with and powers exercised; this will include consideration of the legal and investigations budgets and if these should be included in the annual baseline budget.
- Efficiencies - whether further efficiencies can be made, such as sharing services with other organisations.

Effectiveness and future function

- Governance - whether the current controls and oversight processes as agreed between the NIO and NIHRC and as applied in practice provide sound governance and robust control of public money and allow the NIHRC the freedom to operate to deliver its functions effectively.

Issues out of scope

11. The review will not undertake an audit of the management of day-to-day NIHRC finances, nor provide as part of the recommendations detailed financial or economic modelling of future options - future funding will be considered within the constraints of wider public sector spending reviews.
12. The review will not consider the adequacy of the NIHRC duties and powers as set out in Part VII of the Northern Ireland Act 1998 and Section 5(6)c of the Northern Ireland (Ministers, Elections and Petitions of Concern) Bill 2021, other than those recommended by the sub-accreditation committee of the Global Alliance of National Human Rights Institutions.
13. The review will not consider the NIHRC functions under Schedule 3 of the EU (Withdrawal Agreement) Act 2020, other than to the extent those may impact on the general functioning of the organisation.
14. The review team will make strategic recommendations for the NIO and NIHRC.

Approach and methodology

15. Staff from NIO Sponsor Team and NIHRC will ensure that all relevant information is made available to the review team.
16. The NIO will meet the costs of the review.
17. The review team will include sufficient experience and understanding of the work of the NIHRC and of good governance to be able to test and challenge

assumptions and provide sound conclusions. The final makeup of the review team is still to be determined but will include:

- Simon Routh-Jones as Lead Reviewer.
- a Challenge Board made up of:
 - Suitable qualified independent experts with a background and understanding of how national human rights institutions operate in general, and
 - Senior civil servants with an understanding of how government funding and good governance operates in the public sector.

18. The methodology will include:

- Desk research of key documents.
- Discussions with key stakeholders within the NIHRC and sponsors within the NIO.
- Engagement with relevant stakeholders to explore any issues in detail. This should include the independent Chair of the NIHRC Audit and Risk Management Committee, external and internal Auditors, and if required, representatives of comparator institutions.
- Site visits to the NIHRC office to speak to Commissioners and senior staff to gain an understanding of how the organisation operates and its effectiveness.

19. The review is anticipated to be concluded by the end of October 2022 with a report published shortly afterwards.

Ministerial Approval

20. The Secretary of State for Northern Ireland will sign off and approve the commencement of the review and the final report.

21. The Cabinet Office will be an interested party in the review and may provide advice but the Minister for the Cabinet Office will not be a direct stakeholder.

22. Interim emerging findings will be shared with the Secretary of State for Northern Ireland and with NIHRC Chief Commissioner.