



Northern
Ireland
Office

Review of the Operation of the Troubles Permanent Disablement Payment Scheme

29 August 2024

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Foreword by the Secretary of State for Northern Ireland

The Good Friday Agreement is one of the proudest achievements of the 1997-2010 Labour Government. We recognised then - as we continue to now - that it is essential to acknowledge and address the suffering of victims of violence to facilitate reconciliation, peace and prosperity in Northern Ireland.

There is no doubt that Northern Ireland is, over 25 years later, a better place in which to live, work and invest, and this Government remains determined to ensure that it continues on that upward trajectory. But the legacy of the Troubles still casts a long shadow over many aspects of people's lives.

Approximately 3,500 people were killed and an estimated 40,000 people were injured during that awful period in our history. It is clear that the hurt and suffering caused by decades of terrible violence has had, and continues to have, a profound and deep-rooted impact not just on individuals but on generations of families in Northern Ireland, Great Britain and beyond.

Prior to the opening of the Troubles Permanent Disablement Payment Scheme in August 2021, a victims' pension had been the subject of political debate for too long. In the absence of the Northern Ireland Executive, and with Lord Hain's tireless commitment to those who suffered permanent injury in the Troubles, his amendment to the Northern Ireland (Executive Formation etc.) Act 2019 required the then UK Government to deliver Regulations for this scheme in January 2020. This could not have been achieved without the commitment and resilience of the WAVE Injured Group and others, who pushed for a scheme that acknowledges injured victims of the Troubles for a number of years prior to this scheme's introduction.

The Victims' Payments Board, with the support of partners across the victims' sector, health organisations and government agencies have made much progress in designing and delivering a scheme that is having a transformational impact on people's lives. The Board has so far made payments totalling more than £50m to those who suffered permanent disablement as a result of being injured during the Troubles.

This review has provided an opportunity to reflect on what has been achieved to date and what could be done to build on the progress of the scheme going forward. The Government will support the Board in its delivery of this crucial scheme to ensure that those who were permanently injured - and their families - receive the acknowledgement that they deserve, and for which they have waited so long.

Executive Summary

1. This review considers the progress of the Troubles Permanent Disablement Payment Scheme against its core principles - as set out in the Victims' Payments Regulations 2020 - and whether extensions to the periods for backdating awards and receiving applications should be extended by the Secretary of State for Northern Ireland.
2. To inform this review we engaged with a wide range of stakeholders who have an interest in the scheme. We would like to thank everyone who participated for their time and generosity in sharing their knowledge, expertise and their unwavering commitment to the scheme. We are particularly grateful to those respondents who had applied to the scheme or contributed their views as victims - we appreciate how difficult it can be to share your experience.
3. All the respondents in this review acknowledged that this is a complex scheme to deliver with inherent challenges, particularly in relation to the passage of time, given that most Troubles-related incidents occurred between 30 and 50 years ago. We commend the Board for the progress it has made to date. We met applicants who have now received acknowledgement and payments from the scheme and they told us of the transformational impact this has had on their lives.
4. They told us that their experience of applying was largely positive and they were grateful to the Board and the groups who supported them. We were struck by the high levels of dedication and commitment that all partners have to this scheme and their pursuit of finding solutions to complex and challenging problems that have required innovation, persistence, resourcefulness, empathy and resilience.

Summary of Findings and Suggestions

Collaborative Working

5. Since its inception, the Victims' Payment Board has conducted engagement with a broad range of partners to inform the scheme's design, including how the Board could more effectively share knowledge, and identify and respond to the needs of victims. However, some participants, including victims groups, felt that engagement between the Board and partners had suffered - at times - from a lack of structure. As a result, some respondents said there were fewer opportunities to share information and learning, or to be kept updated as the scheme developed.

6. More formal collaboration opportunities are now in place. To build on the progress that has been made, the current approach should ensure that the following key areas are considered on an ongoing basis:
 - Training: Ensure that training programmes and content are up to date and meeting the needs of applicants.
 - Needs of applicants: Monitor and review the needs of applicants for the duration of the scheme to consider whether there are processes and capacity in place to respond to these needs.
 - Support for applicants: The Board and partners should continue to monitor and review the provision of support services for applicants, ensuring there is both improved awareness amongst applicants of the support available to them.

7. Building on the collaboration to date, the Board and partners should consider further innovative ways to cooperate, such as:
 - Exploring options for developing a single digitised system for sharing information to expedite information retrieval;
 - Cross-checking identification where applicants have already had their ID verified by another partner/service to avoid duplication; and
 - Continuing to test and improve ways to prepare applicants for the application process, thereby managing expectations and reducing potential harm.

Communications

8. The Board has made progress in communicating with both the public and victims. For example, the Board has delivered a communications plan including proactive media engagement and a campaign in which leaflets were distributed to all NI households. However, the feedback we received identified a lack of awareness of the scheme and some of its features, suggesting that there remain some gaps in the Board's communication strategy.

9. To address this, we suggest the Board delivers a continuous communications plan for the remainder of the time that the scheme is open to new applicants, with a focus on awareness-raising, tailored and accessible communications. Key areas of focus for the communications plan should include:
 - Considering how best to target areas and groups where respondents have said there have been too few applications
 - Providing greater clarity on and improved promotion of the benefits of the scheme, the handling of applicants' data, and available support services;
 - Exploring the use of relevant social media platforms to help disseminate messages to wider audiences;
 - Continuing to review all publications, including the application form, accompanying guidance, and determination letter to ensure they are in an

- accessible format, use 'plain language' and include a 'glossary of terms';
- Continuing to communicate and promote on the website how data is handled and the benefits of the welfare adviser support available;
- Considering the introduction of a social media presence which would help the Board disseminate clearly worded information to a wider range of people and would afford opportunities to deliver clear and relatable messaging about the scheme and its benefits to a wider reach of people.

10. The Board should also consider the introduction of designated individual staff 'Points of Contact' for applicants and welfare advisers. This could make it easier and quicker for applicants to seek further information, and for the Board to respond to queries.

Extension to the period for backdating payments

11. Although the Board has proactively attempted to raise awareness about this scheme, concerns were raised by many respondents that there are specific cohorts of people in parts of NI and GB who are at risk of disadvantage, should the backdating payments periods not be extended. This may be because they are still unaware of the scheme, do not realise that they may be eligible or are taking time to consider if they want to apply. There are also concerns about the operational impact on partner resources should they receive an influx of rushed and/or incomplete applications ahead of the current deadline.

12. The Secretary of State has considered the concerns of numerous stakeholders who took part in this review and on that basis, has **decided to extend the period for backdated payments and align it with the end date for applications to the scheme - which is 30 August 2026**. This will ensure that everyone who applies to the scheme and is found to be eligible for a payment, will be able to avail of a backdated payment and avoid placing pressure or stress on applicants, information sharing partners and groups.

Extension to the end date for applications to the scheme

13. Most respondents in this review told us that they thought it was too soon to determine whether the period for accepting applications needed to be extended, and it would be preferable to consider this issue at a later date. On this basis, the **Secretary of State has determined that an extension to the date for which new applications can be made is not necessary at this time**.

Introduction

14. Under the provisions of Section 9 of the [Northern Ireland \(Executive Formation\) Act 2019](#)¹ the UK Government brought forward legislation providing for a scheme of payments to those who have been permanently injured in Troubles-related incidents.
15. The [Victims' Payment Regulations 2020](#)² established The *Troubles Permanent Disablement Payment Scheme* (the scheme) and provisions for the *Victims' Payments Board* (the Board). The scheme opened for new applications on 31 August 2021 and the first payments were made by the end of December 2021.
16. The scheme is devolved and delivered by the Victims' Payments Board. However, the Regulations place the UK Government under a duty to carry out a review of the operation of the scheme, to take place in the third year of its operation. This was designed to ensure that after a reasonable period of time, the UK Government - with input from relevant stakeholders - could consider and report on the progress of a scheme which is both novel and extremely important in attempting to address the legacy of the past.
17. The Victims' Payments Board (the Board) was established in February 2021 and the Department of Justice (DOJ) is the designated department which helps with operational matters such as accounting, staffing and business planning. The Board has 72 members and³ is headed by the President of the scheme, Justice McAlinden. The Board, who are individually appointed as judicial office holders by the Northern Ireland Judicial Appointments Commission (NIJAC), is supported by an administrative secretariat, comprising legal, medical and ordinary members. Their role is to determine the outcome of applications made under the scheme.

The Approach to the Review

18. This review considers the operational progress of the scheme against its key underpinning principles, which were developed following extensive engagement with key stakeholders and are embedded in the Regulations⁴. They are:
 - the need to prioritise, and be responsive to, the needs of victims of Troubles-related incidents;
 - the need to be transparent and to communicate effectively with the public and victims of Troubles-related incidents;

¹ NI (Executive Formation) Act 2019, Section 10, Victims Payments

² [Victims' Payments Regulations 2020](#)

³ [Victims' Payments Board membership](#)

⁴ <https://www.legislation.gov.uk/ukSI/2020/103/made>

- the need for the scheme to be straightforward and simple to navigate;
- the need for applications to be determined without delay;
- the need for personal data to be handled sensitively.

19. In addition to this, the review considers two specific issues which have been the subject of a number of queries from stakeholders and elected representatives in recent months. These are:

- consideration as to whether the period for backdating awards should be extended beyond the current 30 August 2024 cut-off date; and
- consideration as to whether the period for applications to the scheme should be extended beyond August 2026.

20. This review is solely focused on the operation of the scheme. Commercial arrangements, individual decisions and policy matters such as eligibility criteria do not, therefore, fall within the scope of this review.

Engagement

21. Regulation 52 stipulates that, in carrying out this review, the Secretary of State must consult:

- the President of the Board;
- the Department designated to deliver the scheme (the Department of Justice) and the Executive Office, which has policy responsibility for the scheme;
- those representing the interests of people injured or killed as a result of Troubles-related incidents as the Secretary of State considers appropriate; and
- those with experience and training regarding the medical assessment of disability as the Secretary of State considers appropriate.

22. We are aware of the impact trauma can have on individuals and mindful that some victims can have problems of trust in relation to organisations and schemes involved in legacy of the Troubles. On that basis, we tried to be as flexible as possible when taking forward engagement, allowing space for individuals and organisations to provide as much detail as they wanted. We are grateful to everyone who gave up their time to take part.

23. We engaged with stakeholders (listed in [Annex 1](#)) between December 2023 and March 2024 through a range of video calls, face to face meetings, and written submissions.

Principle 1: The need to prioritise, and be responsive to, the needs of victims of Troubles-related incidents

Why this is important

24. In order to apply for this scheme, individuals must provide details about an incident or incidents which took place during a very dark period in our history, a period that we know has had lasting consequences for individuals, families and wider society. So it is absolutely crucial that the Board has sufficient knowledge and understanding of trauma and its impact, and the Troubles, to help build public trust and to deal with applications in a way that reduces the risk of harm to those applying and their families.

Collaborative design

25. Almost all of the respondents we spoke to during the course of the review accepted that the Board had a challenging task to undertake in delivering what is a complex and novel scheme. In order to reduce the risk of causing harm and stress through the application process, the Board made the commendable decision to take most of the burden of sourcing and retrieving information away from the applicant.

26. Prior to the scheme opening, the Board set up a 'Sectoral Implementation Group' with representation from a broad range of partners including representatives from victims' groups, the VSS, the CVS, TEO, and the DoJ. The aim of the Group was to share knowledge on how best to identify and meet the needs of victims. Most respondents who had engaged with this Group were positive about their experience, and viewed effective collaboration, actively listening to each other and a collegiate approach as particularly valuable in a scheme as novel and sensitive as this.

27. Unfortunately, since the scheme opened, some respondents who had been involved in the Sectoral Implementation Group said there were fewer opportunities or mechanisms to engage with the Board in the way they did when the scheme was in its design phase. As a consequence of this, they felt less informed about how the scheme was evolving and developing its ongoing processes to respond to the needs of victims.

28. However, more recently, the Board has convened a series of workshop style collaborations consisting of representatives from victims groups, the VSS, CVS, TEO, DoJ and Capita. These collaborations produced a joint action plan that was shared with partners who were involved in the workshops. Respondents told us that this format was useful and they valued the opportunity to engage

directly with Board members in a structured manner to discuss issues such as the disablement assessment process and communications, and to learn from each other's perspective.

29. It would be sensible for the **Board to continue these formalised arrangements with key partners such as Board members, TEO, DoJ, DoH, Capita, CVS, VSS and victims' groups. The needs of applicants could be a standing item that partners continue to keep under review for the duration of the scheme in order to enable the Board to be responsive to these needs.**

Staff training

30. Many respondents, including victims' groups and applicants, highlighted the importance of training and awareness-raising for those staff who come into direct contact with applicants. They agreed that it was extremely important for staff to be 'trauma informed,'⁵ with a good understanding of the context of the Troubles, to enable them to more effectively communicate and understand the anxiety and needs of victims.
31. The Board and Capita both currently deliver their own individual programmes of trauma training for staff. **In order to ensure content for training is up to date, the Board should consider including the topic of 'trauma awareness' to the joint action plan and sectoral workshops.**

Supporting the needs of applicants

32. The VSS (funded by the NI Executive) coordinates service delivery and funding to meet the needs of individual victims and survivors of the Troubles⁶. The VSS funds Welfare Advisers in five⁷ victims' groups who support applicants by helping submit their application and help them navigate the [seven sequential steps of the application process](#)⁸.
33. The Board signposts potential applicants to the support available on their website⁹. To date, approximately 64% of applicants have opted to use the support of these groups when making their application, and the Board was clear

⁵ [TEO, Strategy for Victims and Survivors of the Troubles/Conflict, December 2023](#)

"Trauma informed means the adoption of practices, where practitioners, volunteers etc. focus on understanding or assessing a person's needs with reference to a loss or trauma the person might have had to better support them or refer them for other services".

⁶ [VSS Support for Troubles victims](#)

⁷ The 5 groups are; Ashton, Ely Centre, Relatives for Justice, SEFF and Wave

⁸ VPB, Procedural Guidance

⁹ [VPB Support Services](#)

that those applications submitted with the help of these groups tend to be of better quality than those that were submitted without the support of the groups.

34. Almost all respondents acknowledged the crucial role these groups have in supporting applicants throughout the process, especially those individuals who may not have engaged with support from victims' groups before. For example, the groups have said that there are many applicants who approach them for support who have never talked about their Troubles-related injury and how it has impacted them and their families before. These applicants often request additional support such as counselling or social support to meet other victims who have had similar experiences.
35. Feedback from several applicants who had used support said they would have struggled at every point in the application process had it not been for the support provided by the groups and said, in their experience, "it was hard to imagine how anyone could apply without support." A number of respondents, including applicants and victims' groups, said that revisiting the incident and the assessment could negatively impact an individual's mental health, and that the holistic support of the VSS network and Welfare Advisers was vital and valuable.
36. All of the victims' groups reported that demand for support continues to grow and that capacity and resources are under increasing pressure. TEO, as the Department responsible for oversight of this scheme and for Troubles-related victim support, has reviewed the provision and demand for Welfare Advisers on a number of occasions and has taken action to deliver additional support where needed. For example, in the course of outreach activities conducted by the Board and TEO, feedback from the Police Benevolent Fund indicated a lack of engagement and understanding of the scheme among police officers who served during the Troubles. In response, TEO funded two Welfare Advisers within the Police Benevolent Fund to support former police officers through the application process.
37. The Board has also made efforts to signpost applicants to the beneficial support available. In order to keep meeting the needs of applicants who may want help to submit an application, **the Board and partners with an interest in services for victims including the VSS, CVS and TEO should continue to keep the availability of support under review.**

Principle 2: The need to be transparent and to communicate effectively with the public and victims of Troubles-related incidents.

Why this is important

38. It is essential that the scheme communicates clearly and effectively with both the general public and those individuals who have been injured and may wish to apply. Effective communication will help individuals make informed choices about applying in the full knowledge of how the process will feel and the possible outcomes. Transparency about processes and decisions will help build public trust in the scheme.

Communication with the public - Awareness raising

39. A number of respondents during the course of the review said there remained some gaps in public awareness regionally and outside NI. Some victims said they were only aware of the scheme through 'word of mouth' and noted a particular lack of awareness in rural areas, the North West of NI, as well as in Great Britain (GB) and the Republic of Ireland (RoI). These victims expressed concern that these gaps in awareness could result in delay in reaching those who may want to apply.

40. Despite a recent leaflet drop to every household in NI and an associated communications campaign, (see para 43 below) many respondents felt that awareness raising by the Board could be improved. This causes a particular risk for those who may not be aware that they could be eligible for the scheme and/or may not be ready to engage with its process.

41. Some victims' groups felt there was a lack of civic engagement with partners in local councils, Good Relations Units, the Community and Voluntary Sector, Neighbourhood Groups and Rural Networks. Several respondents also commented that the scheme does not have a social media presence and this is a potential missed opportunity to engage a wider audience.

42. Several other respondents expressed concern that there was a lack of clarity and awareness of the scheme and its benefits within the veteran community, particularly in GB, such as the ability to pass on their award to their spouse, partner or carer, in some circumstances, through a transfer on their death. This may help explain why fewer applications have been submitted than was originally anticipated. The NI Veterans Commissioner and some groups with links to GB veterans and police associations have said that there has been a delay in this cohort coming forward. This may be because potential applicants are unaware of the benefits and are awaiting the outcome for those who have applied already before considering submitting an application.

43. Notwithstanding these observations, there is evidence that the Board has - at various points - communicated effectively with the general public. Throughout

2022 and 2023 the Board proactively sought to raise awareness and reach non-NI victims with media coverage in local¹⁰ and UK-wide papers, as well as promoting the scheme widely on BBC NI News, amongst others on the second anniversary of its operation.¹¹ The Board also developed a Communications and Engagement Plan for 2023/2024 with a view to improving public awareness of the scheme, including a leaflet drop to all households in NI. The leaflet was sent to all NI Members of the Legislative Assembly, all Westminster Members of Parliament, Peers in the House of Lords, Members of the Dáil and Seanad Éireann, Church networks, healthcare surgeries and Victims Commissioners across NI and GB. Since the leaflet campaign, both the Board and those victims' groups who support applications reported significant increases in phone and email queries, indicating that the communications campaign had resulted in much wider public awareness about the scheme.

44. However, it is clear from the engagement we carried out that a number of respondents do not think that these efforts have gone far enough, both in terms of targeting specific groups and areas in a timely way, and this perception is undermining trust and confidence in the Board.
45. On this basis, **the Board should ensure that it maintains an ongoing communication plan for the remainder of the time that the scheme is open to new applicants, placing emphasis on tailored communications and outreach to targeted areas and groups where there have, to date, been fewer applications than expected. The plan should also ensure that the benefits of the scheme are clearly communicated and promoted, such as the ability to transfer an award on death and lump sum payments options, and amend the support page on the website to better explain the advantages of using the support available including the use of anonymised client feedback. The Board should also develop a social media presence, thereby helping to disseminate clearly worded information to a wider range of people.**

Communication with applicants and potential applicants

Application Process

46. The Board publishes the application form¹² and guidance¹³ on its website. Several respondents commented that both the application form and the guidance lacked some clarity about who the scheme is for, and that the

¹⁰ [Belfast Telegraph 15 April 2023 "Compensation scheme seeks non-NI victims of Troubles"](#)

¹¹ [BBC 28 September 2023](#)

¹² [TPDS Application Form](#)

¹³ [TPDS Guidance to applicants](#)

explanation of the eligibility criteria contained too much jargon and could benefit from more simple language.

47. For example, some victims who had been through the application process said that when they looked at the application form they struggled to understand if they were the 'applicant' or the 'beneficiary' and what the difference was. Several respondents also commented that the Board's website was not very user-friendly, contained a lot of very long and legalistic information, and the explanation of the eligibility criteria was sometimes not clear enough for people to know whether or not they may be eligible before applying.
48. The Board has listened to feedback from applicants and, as a result, the application form is being revised. We welcome this positive step and suggest **it would be sensible for the Board to continue to revise its accompanying guidance**. This may help potential applicants understand the eligibility criteria and how the Board makes its determinations. For example, the use of examples or anonymised case studies could help make complex information more relatable to the lived experience and help manage expectations.
49. **The Board should also add a clear, user friendly 'glossary of terms' to its website to aid understanding, and consider whether the increased use of audio-visual tools such as infographics and video content might ensure that the website is more accessible and user-friendly for both applicants and visitors to the website.**

Correspondence

50. We received feedback that the focus of the determination letter (which contains details of the decision made about whether the application was successful or not) was legalistic and poorly crafted, without sufficient recognition of victimhood and harm.
51. Several respondents in groups and applicants commented on the infrequency of updates throughout the application process, which led to increased anxiety. They suggested that more frequent updates would reassure applicants that their applications are important and still active. Some respondents in the victims' groups suggested that contact could be improved between the Board and Welfare Advisers, by designating a specific 'Point of Contact' within the Board which would help resolve queries or issues for applicants more quickly.
52. Currently, the Board provides updates at each point at which an application moves from one stage to the next, and recent changes to the applicant portal allow applicants to log on and view updates on the progress of their case. This is an extremely positive development.

53. Building on the review of the application form and guidance, **the Board should take this opportunity to consider the language and format of the determination letter, and ensure that accessible and relatable language is used. To increase accessibility and resolve issues more swiftly, the Board should also consider using designated individual ‘points of contact’ for both welfare advisers and applicants.**

Principle 3: The need for the scheme to be straightforward and simple to navigate

Why this is important

54. This is a complex and novel scheme and each applicant's experience will be unique. Some applicants may have been physically and/or psychologically injured in one Troubles-related incident, but some will have been injured - to varying physical and psychological degrees - in multiple Troubles-related incidents.

Navigating the application process

55. The seven sequential stages of the process illustrate the complexity involved in this scheme, making it even more important that individuals applying to the scheme can do so in a way that is as user friendly as possible.

56. Several respondents from victims' groups and some applicants commented that the verification of eligibility in terms of their presence at a 'Troubles-related incident' should be checked and determined before proceeding to other stages. One applicant was extremely distressed to go through the disablement assessment and wait two years to find out that he did not meet the criteria for presence at the incident. He said that had these criteria been determined at Step 2 (verification of an application) rather than Step 5 (determination process) he would not have had to wait so long or go through assessment of permanent disablement (at Step 3).

57. Several respondents from the victims' groups gave examples from applicants being asked questions which they felt were intrusive and unnecessary. For example, some applicants were asked if they knew who had caused their injury or whether they knew why they had been targeted. These questions were seen as problematic and irrelevant, and caused considerable distress.

58. It would be sensible for **the Board to collaborate with partners to test how best to explain to applicants what questions they will be asked and why these are necessary and to update both the guidance¹⁴ and Frequently Asked Questions section of its website,¹⁵ to this effect.**
59. We have heard from applicants that receiving support from the victims' groups has made the process simpler and easier for them. Whilst the Board's website and leaflet promote the availability of free support, we have heard feedback that the benefits of this support should be made clearer to applicants in terms of helping to navigate a complex process and managing the impact of revisiting traumatic experiences.
60. **The Board should expand the "Support Services¹⁶" section on the website by adding more detail and context about the benefits of using the support available. Currently, potential applicants are only made aware that support is available and contact details for the groups. More detail and client testimonies might help contextualise the advantages of using support so that they can make an informed decision about whether to use it or not.**

Principle 4: the need for applications to be determined without delay

Why this is important

61. Injured victims of the Troubles have waited for a number of years for a scheme that acknowledges the harm they have endured, and because many of these incidents took place 30, 40 or even 50 years ago, the average age of applicants to the scheme is 65. It is therefore particularly important to ensure that the Board is able to make decisions on applications as soon as it possibly can, to ensure that payments can get to victims as soon as practicable.
62. Almost all respondents agreed that determinations are taking too long and that recovering information to support an application is the single biggest cause of delay.
63. Some respondents told us that an application can become "stuck" in any one of the seven sequential stages for a considerable period of time, and for a variety of reasons, such as waiting times for getting information from partners, or if an individual has been present at a number of Troubles related incidents.

Information Sharing and Retrieval

¹⁴ [TPDS Guidance to applicants](#)

¹⁵ [TPDS FAQ section](#)

¹⁶ [TPDS Support Services](#)

64. We engaged with officials in the DOH Regional Model Team (RMT), the Ministry of Defence (MoD) and the Police Service of Northern Ireland (PSNI). These organisations - amongst others - have information sharing agreements with the Board and have worked closely together to address issues that may have contributed to delays. They said there have been several issues that have impacted on retrieving information, particularly in the early days of the scheme, including: recruitment of staff members and obtaining the appropriate security vetting; resource challenges; and sourcing and retrieving records that may not exist decades later. In addition to this, poorer quality applications, usually submitted without support, tend to have gaps in detail that can make it harder for them to source the supporting information.
65. The Board and partners including Capita, TEO and the DOH worked together to design, resource and establish a bespoke process within DOH called the 'RMT'. This became operational in October 2023 and its purpose is to retrieve medical information from hospitals quicker by creating a centralised system of administrators in each of the five NI trusts. Once an applicant's medical records are retrieved, which can often take time, there are clinicians who then produce a medical report to help Capita with the permanent disablement assessment.
66. It was suggested by Health officials that in order to expedite information retrieval the inclusion of the applicant's Health and Social Care Number would make tracking historic medical records considerably easier for the RMT. The Board has confirmed that this is being adopted for the new application form, which is due to launch shortly.
67. Some respondents suggest addressing barriers in information sharing systems could lead to a further reduction in delays. **If agencies and departments including the Board, Capita and the RMT were to share one digitised system for sharing information, all the relevant medical information that would be required to retrieve health related records would be available in one place.**

Application Form

68. Applications to the scheme can be submitted in different formats including online, paper or in PDF format. Some victims' groups - who often submit applications on behalf of individuals - prefer paper applications because they had previous experience of technical issues with the online portal on the Board's website. Others thought the portal was the most effective use of time and resources.

69. Some applicants we spoke with felt that to help speed up the Step 2 verification process (when the Board verifies the identity of the applicant by checking documents such as a birth certificate), those who have previously availed of support from the VSS, received Criminal Injuries Compensation or are in receipt of benefits such as PIP will already have had their identity verified. **Where these agencies are already sharing information with the Board and have an information sharing agreement in place, the Board should take the previous verification as proof of identity.**

Principles 5: the need for personal data to be handled sensitively

Why this is important

70. Those who have suffered as a result of the Troubles are required to share information about themselves, circumstances of the incident, their injury and how it has affected them, as well as personal information about where they live or have lived. It is of crucial importance that this data is handled sensitively not only in terms of legal compliance, but in order to build trust with those who may be circumspect about sharing personal Troubles-related information.

Communicating data protection measures

71. There were no tangible concerns related to data handling and protection raised by respondents. Feedback from several respondents highlighted that the legacy of the Troubles has left many victims distrustful of public bodies and that, generally, older people can be more circumspect about the risks related to electronically held data including who can access it. Other potential applicants such as veterans and security force personnel are sceptical about how official schemes and processes that relate to the Troubles handle data. The perception that there may be a risk of possible data breaches, leading to compromised security, remains a barrier for some individuals from a security forces background from applying.

72. Notwithstanding the lack of specific concerns around handling data, it is important to acknowledge these perceptions. The Board should take further steps to reassure people that data is held safely to avoid these perceptions having a 'chilling effect', particularly on those from a security force background or from those individuals who are victims of intra-community violence.

73. The Board appears to have taken all necessary steps to ensure data is handled sensitively, such as following strict protocols and procedures and ensuring all staff have relevant clearances to deal with sensitive information. **In order to build trust and provide reassurance, the Board should proactively**

promote how alive it is to these issues through communications channels.

74. For example, the ‘Making an application’¹⁷ section of the Board’s website could explain - in plain language - how the Board is aware of security sensitivities and the steps they have taken to ensure they can be trusted handling people’s personal data.

75. The use of social media, including the use of infographics and vlogs, would be useful channels to highlight the importance of data sensitivity and how the Board handles personal data.

Extensions to the backdating period

76. Anyone who is found eligible for the scheme will get a backdated payment in addition to their annual payment. This was included in recognition of the passage of time since political commitments were made as part of the Stormont House Agreement on 23 December 2014 to establish a scheme such as this. For example, if an individual is deemed eligible to receive £5,000 per year in 2024, this will be backdated to the Stormont House Agreement meaning they will get an additional lump sum payment of approximately £50,000. The availability of backdated payments for eligible applicants is due to end in August 2024 (3 years after the scheme opened), although the Regulations give the Secretary of State for Northern Ireland the power to extend this.

77. Since the Board’s leaflet campaign in February 2024, there has been a significant increase in requests for application forms from the Board and the victims’ groups have also reported a significant spike in requests for support with applications. However, the groups do not have the capacity to support all those who have requested help before the backdating deadline, and the Board are concerned that individuals may be forced to submit applications without assistance, containing insufficient or incomplete details.

78. Most of the respondents during the review requested a change to, or removal of, the current backdating date. Others highlighted concerns around resourcing if the date is not extended and they have to deal with ‘placeholder applications’ being submitted with very little detail.

79. Many respondents commented that there is a delay in applicants coming forward and they offered explanations for this. Many people living through the Troubles ‘just got on with it’ and often do not consider themselves ‘victims’ of

¹⁷ [TPDS Making an application](#)

the Troubles, or 'disabled'. As a consequence, when they see these terms being used in the context of this scheme, they think it does not apply to them.

80. Deferring the decision to apply is especially true for people who have suffered psychological injury and have resulting conditions such as PTSD. Some individuals who have experienced trauma (either physical or psychological) may not yet be ready or need time to present themselves to schemes such as this one. So, if widespread communication about the existence of the scheme has been accelerated recently, there is likely to be a cohort of people who are now aware of the scheme, but are not yet ready to revisit the trauma which caused their injury, and understandably need some more time.
81. The Secretary of State has considered the concerns of numerous stakeholders who took part in this review and on that basis, has **decided to extend the period for backdated payments and align it with the end date for applications to the scheme - which is 30 August 2026**. This will ensure that everyone who applies to the scheme and is found to be eligible for a payment, will be able to avail of a backdated payment and avoid placing pressure or stress on applicants, information sharing partners and groups.

Extension to the end date for the scheme

82. The scheme is due to close for new applications on 30 August 2026 (five years after the scheme opened) and the Regulations give the Secretary of State for Northern Ireland the power to extend this date.
83. Most respondents were more concerned about an extension to the period for backdating and did not request an extension to the period for submitting applications at this time. Some stated that it was more advisable to keep progress under review subject to delivery of an effective communications and outreach campaign. On this basis, the **Secretary of State has determined that an extension to the date for which new applications can be made is not necessary at this time**.

ANNEX 1

List of Respondents

Alliance Party
Ashton Centre
Capita
Commissioner for Victims and Survivors
Department of Justice
The Executive Office
Dr Ciaran Mulholland, Consultant Psychiatrist, Senior Lecturer School of Medicine
Queen's University Belfast and Clinical Director Regional Trauma Network
Ely Centre
President of the Victims Payments Board
Secretariat, Victims Payments Board
Victims Forum
Ministry of Defence
PSNI Legacy and Disclosure Branch
Lead official, Department of Health Regional Model
Ulster Human Rights Watch
Omagh Support and Self Help Group
Relatives for Justice
WAVE
SEFF
Sinn Féin
Veterans Commissioner, NI
Victims and Survivors Service
Police Benevolent Fund
WAVE Injured Group Members

