

Code of Ethics



Contents

Fiosrú Code of Ethics	3
Introduction	3
Equality and Respect	4
Independence and Building Confidence	5
Integrity	6
Presentation and Personal Behaviour	7
Fiosrú Investigations and Operations	8
Policy on the Acceptance of Gifts	9
Official Secrets & Integrity, Conflict of Interest, Conflict Register	11
<i>Official Secrets & Integrity</i>	<i>11</i>
<i>Conflict of Interest</i>	<i>12</i>
Confidentiality and Record-Management	16
Code of Standards and Behaviour	18
Dealing with a Complaint about Fiosrú	19
<i>Making a Complaint</i>	<i>19</i>
<i>Processing a Complaint</i>	<i>19</i>
<i>Review of Decision</i>	<i>20</i>
<i>Record Keeping</i>	<i>20</i>
<i>Appendix A – Complaint Form</i>	<i>21</i>
Criminal Conviction	23
Freedom of Information	24
Data Protection	25
Document Control	26



Fiosrú Code of Ethics

Introduction

1. This Code of Ethics replaces the previous [Code of Ethics of the Garda Síochána Ombudsman Commission](#) and reflects the establishment of Fiosrú under the [Policing, Security and Community Safety Act 2024](#). This Code shall take effect from the date of its commencement.
2. This [Code of Ethics](#) for the guidance of members and staff of Fiosrú, the Office of the Police Ombudsman* has two principal purposes:
 - A. To assist members and staff in fulfilling their obligations at law and, in particular, their obligations under the [Policing, Security and Community Safety \(PSCS\) Act 2024](#)¹ and the [European Convention on Human Rights Act 2003](#)².
 - B. To assist the members and staff of Fiosrú in their three objectives, set out in the PSCS Act 2024 of
 - a. to promote public confidence in the processes for resolving complaints made by members of the public and in investigations under Part 6 of the PSCS Act 2024
 - b. to improve public understanding of the role and functions of the Police Ombudsman, and
 - c. to ensure that his or her functions are performed in a timely, efficient and effective manner and in accordance with fair procedures.
3. The Code should be read in conjunction with the [Fiosrú Staff Handbook](#) and with the [Civil Service Code of Standards and Behaviour](#)³ which is outlined in the handbook.
4. Members and staff of Fiosrú are required to discharge their duties in accordance with this Code and in accordance with the law, as set down in all relevant legislation and lawful regulation. Any breach may lead to an investigation and possible sanction, either by way of criminal prosecution or disciplinary process.
5. Members and staff of Fiosrú will, at no time, whether on duty or otherwise, behave in a manner likely to bring discredit on the organisation.

¹ [PSCS Act 2024](#)

² [ECHR Act 2003](#)

³ [Civil Service Code of Standards and Behaviour](#)



Equality and Respect

1. Fiosrú personnel will seek to establish truth, based on evidence, lawfully obtained in their inquiries, their case work and other areas of operation.
2. Fiosrú personnel will treat all persons with whom they have professional contact with equality, dignity and respect and will operate in accordance with Irish equality legislation.
3. No person with whom Fiosrú has contact will be discriminated against on grounds of gender, marital status, family status, age, disability, sexual orientation, religious belief, race, membership of the Travelling Community, political convictions, place of birth or residence, occupational status or any other status⁴.
4. Fiosrú personnel will treat all persons with whom they have professional contact with courtesy, understanding, politeness and self-control.

*** Note:** *In this Code, references to "members and staff of Fiosrú" include the Police Ombudsman and Deputy Police Ombudsman as office-holders appointed by the President under the Policing, Security and Community Safety Act 2024, together with all members of staff.*

⁴ [IHREC Act 2014, s 42](#)



Independence and Building Confidence

- 1.** Fiosrú personnel will be aware of and will maintain the independence of the organisation from the Garda Síochána, The Department of Justice, Home Affairs and Migration and both statutory and non-governmental bodies whose functions may touch upon the area of criminal justice.
- 2.** Fiosrú personnel will disclose to Fiosrú any private interest, or potential conflict of interests that may have a bearing upon their work or that could be seen as such. Officers who are involved in Fiosrú investigations are required to disclose any knowledge they may have with respect to complainants and/or members of Garda personnel who are involved in cases assigned to them. In such cases Fiosrú will seek to resolve any issues in a way that protects the public interest.
- 3.** Information received in the course of their duties will be treated as strictly confidential, within the law, by Fiosrú personnel. Where information relating to Fiosrú business is to be disseminated, this will be done only through channels authorised by the Fiosrú Executive and/or Senior Leadership Team.
- 4.** Fiosrú personnel will ensure, insofar as possible, that all actions in pursuit of their duties are discharged at the highest levels of efficiency, accuracy, thoroughness and completeness.



Integrity

1. Fiosrú personnel shall take professional decisions on a basis of personal disinterestedness and not on the basis of any improper gain.
2. Fiosrú personnel shall not accept any gifts or similar favours unless authorised by Fiosrú. Any such offers or gratuities should be declared to Fiosrú and personnel must act within the law at all times.
3. Personnel of Fiosrú must report to Fiosrú any proceedings or allegations of a criminal act, or any investigations by the Garda Síochána into any such allegations against them.
4. Fiosrú personnel shall not place themselves under any obligation to individuals or organisations that might influence, or be seen to influence, them in the carrying out of their duties. Where any doubt arises in such situations, personnel will refer the matter to their superior authority.
5. Fiosrú personnel shall not commit any act of corruption or dishonesty. They will oppose and report to their superiors any and all such acts coming to their attention. They will be supported by colleagues and their superiors on any occasion on which they do so.
6. Fiosrú personnel will operate to the highest standards of probity and propriety in the stewardship of public funds, equipment and other resources.



Presentation and Personal Behaviour

1. Personnel of Fiosrú shall never be unfit to carry out their professional duties as a result of alcohol or substance abuse. Personnel on 'call out' duties, in particular, will ensure that they always meet these criteria.
2. Fiosrú personnel will always maintain a professional image and demeanour when on duty. In particular, they will never employ threatening or overbearing behaviour; they will not use foul language in any professional context; they will not use language that is sarcastic or demeaning of persons with whom they have professional contact.
3. Fiosrú personnel will, where requested and where it is appropriate, identify themselves as such. They will take whatever reasonable measures may be necessary to ensure that persons with whom they have professional dealings are aware that Fiosrú staff are not members of the Garda Síochána.



Fiosrú Investigations and Operations

1. Fiosrú personnel will not knowingly or through neglect make any false, misleading or inaccurate statement in regard to their professional functions. Nor will they alter, destroy, mutilate or improperly dispose of any record, document or other item that may have a bearing on their functions or operations.
2. Fiosrú personnel engaged in investigations or case work will follow the principle that Gardaí who are the subject of either a criminal or a disciplinary inquiry are to be presumed innocent until lawfully adjudged to be otherwise.
3. Fiosrú personnel will be aware of the special needs of persons, whether complainants, Gardaí complained against, witnesses or family members, who may be vulnerable. They will take measures and offer guidance to mitigate such vulnerability where necessary. They will also be aware of and will take appropriate measures to protect and support witnesses where there is the risk or fear of intimidation.
4. Fiosrú designated officers will use their powers, immunities and privileges, provided for under the [Policing, Security and Community Safety Act 2024](#)⁵, only when it is lawful, necessary and proportionate and in accordance with the specific provisions of the Act.
5. Persons who are detained or who voluntarily present themselves for interview by Fiosrú personnel will be treated at all times with dignity and in a humane manner and in accordance with their rights at law.

⁵ [PSCS Act 2024](#)



Policy on the Acceptance of Gifts

The Civil Service Code of Standards and Behaviour⁶ states:

- Civil servants should not receive benefits of any kind from a third party which might reasonably be seen to compromise their personal judgment or integrity. The overriding concern is that the actions of civil servants be above suspicion and not give rise to any actual or potential conflict of interest, and that their dealings with commercial and other interests should bear the closest possible scrutiny.

For the purpose of this policy, a “gift” includes any Benefit which is given to a civil servant free of charge or at less than its commercial price. The Policy is as follows:

- Subject to any rules which the Chief Executive Officer may determine, an officer may accept and retain gifts of modest value (e.g. diaries, pens, etc.). Any gift of more significant value should be refused or, if such refusal would cause offence, should be handed over by the staff member to Fiosrú Corporate Services.
- A gift, other than a gift of modest value, given to a civil servant by virtue of his or her official relationship with the donor or this office’s commercial dealings with the donor must be regarded as property of Fiosrú.
- Particular care should be taken in relation to gifts from donors who stand to derive a personal or commercial benefit from their relationship with the office.
- Cash, gift cheques or any vouchers that may be exchanged for cash may not be accepted regardless of the amount.
- Staff members may not solicit gifts, directly or indirectly.
- Staff members should not accept special facilities or discounts on private purchases from suppliers with whom they have official dealings.

If you are in any doubt as to whether a gift could be considered as being of modest or significant value, the matter must be referred to your manager for direction and clarification.

It should be noted that, under the Ethics in Public Office Act 1995⁷ as amended by the Prevention of Corruption (Amendment) Act 2001⁸, the corrupt giving of gifts to, or receipt of gifts by, civil servants is a criminal offence punishable by imprisonment or fine or both. The Acts provide that money, gifts or

⁶ [Civil Service Code of Standards and Behaviour](#)

⁷ [Ethics in Public Office Act 1995](#)

⁸ [Prevention of Corruption \(Amendment\) Act, 2001](#)



other consideration received by a civil servant from a person holding or seeking to obtain a contract from a Government Department/Office is deemed to have been received corruptly unless the contrary is proved.



Official Secrets & Integrity, Conflict of Interest, Conflict Register

Official Secrets & Integrity

Given the sensitivity and public profile of our business it is vital that we establish and maintain a reputation of the highest ethical standards in regard to how we conduct our investigations and handle the information on our files. To achieve this it is expected, as with all Civil Servants, that we comply with the requirements of the [Official Secrets Act 1963](#)⁹.

Requirements

- Each officer of Fiosrú shall ensure that s/he treats all information learnt in the course of their duties with respect and confidentiality.
- Officers shall not discuss, copy or forward any information to any person unless s/he has an official involvement in the matter.
- Officers shall not discuss Fiosrú business or investigations outside of the organisation without prior authorisation.
- Officers shall not involve themselves in investigations to which they have not been assigned.
- Officers shall observe the policy on conflict of interest.
- Officers shall refer all media queries to the appropriate officer in Communications.

As a general rule, officers should ensure that any and all Fiosrú business remains confidential and is not shared with any external party without prior authorisation.

⁹ [Official Secrets Act 1963](#)



Conflict of Interest

Introduction

In the performance of our public duties Fiosrú seeks to ensure that there neither exists, nor could there be a perception of, the potential for a conflict of interest between individual's personal and professional matters.

Fiosrú is committed through its policies, behaviour standards and operational practices to safeguarding the integrity of each individual involved in the handling of a complaint, the public and the professional decision-making process. Such commitment necessitates employees of Fiosrú to disclose and report in writing to HR situations or circumstances where conflicts or potential conflicts of interest may arise.

In the interests of protecting the integrity of both staff members and the organisation it is important to communicate the following points:

- Potential conflicts that are disclosed can be adequately managed with due regard for the reputation, integrity and position of both the organisation and the individual staff member;
- It is important to identify, assess and manage these potential conflicts to assure that both the integrity and the core activities of its staff are protected;

The Civil Service Code of Standards and Behaviour¹⁰ details the following:

- *"Civil servants may not at any time engage in, or be connected with, any outside business or activity which would in any way conflict with the interests of their Agency, or be inconsistent with their official positions, or tend to impair their ability to carry out their duties as civil servants. For this reason, civil servants intending to be engaged in or connected with any outside business or employment should inform their Human Resources Management Section of such an intention. Whole-time civil servants whose duties are of a professional character (e.g. doctors, engineers, architects, veterinary surgeons, solicitors, etc.) must not engage in private practice in their professions. Any case in which the propriety of undertaking a particular business or occupation could reasonably be open to question must be referred by the civil servant concerned to the Secretary General or Head of Office.*
- *Civil servants must never seek to use knowledge acquired in the performance of, or as a result of, their official duties to benefit themselves, or others with whom they have personal, family or other ties. A civil servant who, in the course of his or her official duties, comes into contact with*

¹⁰ [Civil Service Code of Standards and Behaviour](#)



any matter affecting any commercial undertaking in which he or she has an interest, must immediately disclose the nature and extent of that interest to the Secretary General or Head of Office. Another civil servant should in the normal course, unless the Secretary General or Head of Office considers it unnecessary, be assigned to deal with the matter.

- *A civil servant who experiences financial difficulties which may compromise, or be reasonably seen by others to compromise, him or her in the performance of his or her duties (e.g. through bankruptcy, or insolvency, or by incurring a significant liability to any person, financial institution or other body with whom he or she has official dealings) must report that fact to the Secretary General or Head of Office. Any such information shall be dealt with in the strictest confidence by the Department/Office and the officer concerned will be offered such assistance as is available (for example through the [Civil Service Employee Assistance Service](#)¹¹) to resolve his or her difficulties.*
- *A civil servant is not permitted to make representations on behalf of an outside association or organisation, either as an individual or as a member of a delegation, in relation to matters for which his or her Department/Office has responsibility except with the specific prior consent of the Head of his or her Department/Office.”*

Disclosure of Conflicts of Interest

- Civil servants who occupy positions which are “designated positions” for purposes of the [Ethics in Public Office Acts 1995](#)¹² and [2001](#)¹³ (the Ethics Acts) have certain statutory obligations in relation to disclosure of interests via the annual Declaration of Interests Form. Those obligations are additional to any which apply generally to civil servants under the provisions of this Code. It should be noted that all civil servants are required to observe the provisions of this Code, such as the provisions in relation to the acceptance of gifts, which are more stringent than corresponding statutory provisions.
- The positions in the Civil Service which have been designated for the purposes of the Ethics Acts are contained in [the Ethics in Public Office \(Designated Positions in Public Bodies\) Regulations 1996 \(S.I. No. 57 of 1996\)](#)¹⁴. [NB. the Ethics in Public Office (Designated Positions in Public Bodies) Regulations 2004 (S.I. No. 698 of 2004) revoking S.I. No. 57 of 1996 were signed by the Minister for Finance on 3 November 2004 and come into operation on 1

¹¹ [Civil Service Employee Assistance Service](#)

¹² [Ethics in Public Office Act 1995](#)

¹³ [Standards in Public Office Act 2001](#)

¹⁴ [Ethics in Public Office \(Designated Positions in Public Bodies\) Regulations 1996, SI 57/1996](#)



January 2005]. In summary, established civil servants at Principal Officer level and upwards are affected by the provisions of the Ethics Acts. The Ethics Acts also apply to a range of less senior positions (e.g. posts dealing with contracts or in commercially sensitive areas), and to advisors who are appointed personally by Ministers, and who serve as unestablished civil servants for the length of their Minister's tenure of office. Personnel Officers must notify an officer on taking up duty in a designated position of the obligations attaching to that position.

- Civil servants should be furnished with a copy of the "[Guidelines on compliance with the provisions of the Ethics in Public Office Acts 1995 and 2001](#)¹⁵", published by the [Standards in Public Office Commission](#)¹⁶.

Specific Guidelines

- Fiosrú staff must not involve themselves in any case that does not fall to be dealt with by them in the normal course of their duties or responsibilities. The officer must not seek to direct or influence a subordinate or colleague to deal with such cases in any manner outside of normal procedures.
- If, in the course of normal duty, an officer is actually assigned, or comes across, a case on which they (or a relative or a friend) have an interest the nature and extent of the interest must immediately be disclosed to their line manager. They must not deal with that case unless, in exceptional circumstances, their manager directs him/her to deal with it. This applies to staff engaged in policy-type work as well as the more operational work.
- Officers of Fiosrú must not engage in any outside activity (including any business activity) that conflicts in any way with official duties, impairs performance or compromises our integrity as officers of Fiosrú.
- Officers of Fiosrú must never seek to use confidential knowledge acquired in the performance, or as a result of, their official duties to benefit themselves, or others with whom they have personal, family or other ties. Any officer who, in the course of his or her official duties, comes into contact with any matter affecting any "undertaking" in which he or she has an interest, must immediately disclose the nature and extent of that interest in writing and verbally to their manager.

¹⁵ [Guidelines on compliance with the provisions of the Ethics in Public Office Acts 1995 and 2001](#)

¹⁶ [Standards in Public Office Commission](#)



Ethics in Public Office Acts

Officials who occupy positions which are 'designated positions' for the purposes of the [Ethics in Public Office Acts 1995](#)¹⁷ and [2001](#)¹⁸ have certain statutory obligations in relation to disclosure of interests on an annual basis and on an ad hoc basis. (Generally, 'designated positions' are all positions at Principal Officer level and above and some less senior positions having responsibility in relation to contracts for the purchases of goods and services and/or approving payments for goods and services).

Fiosrú is committed to the highest standards of public and business ethics. Fiosrú affirms and commits to the [Civil Service Code of Standards and Behaviour](#)¹⁹. If you are in any doubt as to whether something constitutes a conflict or potential conflict of interest, you must bring your concerns to your manager for clarification.

¹⁷ [Ethics in Public Office Act 1995](#)

¹⁸ [Standards in Public Office Act 2001](#)

¹⁹ [Civil Service Code of Standards and Behaviour](#)



Confidentiality and Record-Management

1. Fiosrú holds significant volumes of sensitive information and personal documentation relating to complainants and other individuals in the course of its work.
2. In the performance of its functions, Fiosrú also generates substantial volumes of documentation, including draft material, which may contain similarly sensitive information.
3. It is essential that all such information is protected at all times and that appropriate measures are taken to prevent any unauthorised access, disclosure or loss, including through the improper disposal of materials.
4. Fiosrú personnel shall ensure that all confidential waste is disposed of securely and in accordance with organisational procedures, and that care is taken to distinguish between material suitable for disposal and material which must be retained.
5. Fiosrú personnel shall ensure that all files and documents are appropriately secured when not in use, including at the close of business each day.
6. Similarly at the end of the day, all files in use should be at least closed or covered if left on a desk, if not locked away at the close of business each day.
7. The following rules are to be observed by all personnel in order to support the secure handling and protection of information.
8. Failure to comply with these rules will be considered to be a serious misdemeanour. As a result, you are asked to return the attached form to acknowledge that you have read the rules and know and understand what is required of you, to arrive no later than 10 working days after your date of commencement.

Rules on Confidentiality

The following rules are designed to ensure that we comply with the provisions of the [Policing, Security and Community Safety Act 2024](#)²⁰ and [The Official Secrets Act 1963](#)²¹, and must be observed at all times:

- Some rough Fiosrú documents and unneeded Fiosrú photocopies may need to be shredded. However, some rough documents, for example, handwritten notes of phone calls and / or interviews should not be shredded and should be placed on the files so they are discoverable

²⁰ [PSCS Act 2024](#)

²¹ [Official Secrets Act 1963](#)



in the event of proceedings been taken - please consult your manager for advice and guidance.

- Every officer should shred all their own waste material at the end of every day and should leave enough time to do this before departing from the office.
- All files must be put away in locked presses at the end of the day or covered so as to not leave sensitive information in a prominent place.
- Particular care must be taken not to lose sensitive documents or to leave sensitive documents or photocopies in the print areas.
- Each Higher Executive Officer shall take responsibility for the implementation of their rules in his/her area and ensure that the presses are locked every evening.
- In this context, it is worth reminding everyone that [The Official Secrets Act²²](#) makes it an offence to tell anyone outside of the office anything about Fiosrú, its workings or its complainants. Should anyone seek information from you, you should contact senior management before replying to any query or divulging any material about our work.

²² [Official Secrets Act 1963](#)



Code of Standards and Behaviour

The Civil Service Code of Standards and Behaviour²³ sets out the standards required by all Civil Servants in the discharge of their duties and sets out a clear framework within which Civil Servants must work.

²³ [Civil Service Code of Standards and Behaviour](#)



Dealing with a Complaint about Fiosrú

Fiosrú is committed to delivering a high standard of service in all of its interactions. Where concerns arise regarding the conduct of staff or the quality of service provided, complaints of alleged maladministration will be managed in a manner that is fair, confidential, transparent, and efficient.

Making a Complaint

Complaints of alleged maladministration concerning Fiosrú staff should be made in writing, either by letter or email, and should include sufficient detail to enable assessment and investigation.

Complaints should be addressed to:

Head of Human Resources

Fiosrú – Office of the Police Ombudsman

150 Abbey Street Upper

Dublin 1

or

Human.Resources@Fiosrú.ie

Where a complaint is made by telephone, a written summary of the complaint may be prepared and shared with the complainant for confirmation prior to progressing the matter.

Processing a Complaint

All complaints received will be managed in accordance with [Fiosrú's Maladministration Policy](#) and associated procedures.

- Complaints will be logged on the Complaints Register upon receipt.
- An acknowledgement will issue **within five (5) working days**, confirming receipt and the expected timeframe for processing.
- Complaints will be assessed to determine whether they fall within the scope of alleged maladministration and whether further action is required.
- Where appropriate, an investigation will be conducted, which may include review of documentation and engagement with relevant parties.
- A decision will be made by the Head of HR and communicated to the complainant, including the outcome and reasons.



Fiosrú aims to conclude complaints **within 20 working days**, where possible. Where delays arise, the complainant will be informed of revised timelines.

Review of Decision

A complainant may request a review of the outcome of their complaint **within five (5) working days of notification of the decision**.

Requests for review should be submitted in writing to the Director of Administration, who will consider the matter and communicate the outcome.

Record Keeping

A secure register of complaints will be maintained by the Head of HR. All records will be managed in accordance with Fiosrú's data protection and records management obligations.



Appendix A – Complaint Form



Complaint form

Your Full Name: _____

Your Address: _____

CMS Reference Number: _____

Staff Member: _____

Details of Complaint: (please provide a full description of the nature of your complaint, please use an additional page if necessary and number and sign each additional page)

Signed:

Date:

Please return the completed Form to: Human.Resources@fiosru.ie or

HR Unit, Fiosrú, Office of the Police Ombudsman, 150 Upper Abbey Street, Dublin 1 D01 FT73



Complaint form

Page Number:

Signed:

Date:

Please return the completed Form to: Human.Resources@fiosru.ie or

HR Unit, Fiosrú, Office of the Police Ombudsman, 150 Upper Abbey Street, Dublin 1 D01 FT73



Criminal Conviction

As is required throughout the Civil Service, if an Officer acquires a criminal conviction whatever the nature of the offence, he/she must immediately inform, in writing, his/her manager and the Assistant Principal Officer responsible for Human Resources.

Personnel of Fiosrú must report to Fiosrú any proceedings or allegations of a criminal act, or any investigations by the Garda Síochána into any such allegations against them.



Freedom of Information

Fiosrú, the Office of the Police Ombudsman, is subject to the provisions of the [Freedom of Information Act 2014](#)²⁴, in line with its statutory functions. Please note that Fiosrú is not subject to the Freedom Of Information Act insofar as it relates to records concerning an investigation carried out by the Police Ombudsman under [Part 6 of the Policing, Security and Community Safety Act 2024](#)²⁵.

²⁴ [Freedom of Information Act 2014](#)

²⁵ [PSCS Act 2024](#)



Data Protection

Fiosrú, the Office of the Police Ombudsman, is registered with and regulated by the [Data Protection Commission](#)²⁶ and complies with applicable data protection legislation, including the [General Data Protection Regulation](#)²⁷ and the [Data Protection Act 2018](#)²⁸.

²⁶ [Data Protection Commission](#)

²⁷ [General Data Protection Regulation](#)

²⁸ [Data Protection Act 2018](#)



Document Control

Document Details	
Document Authors	Jack Cuddy, AO HR Stuart Keany, Head of HR Leslie Hallows, A/AP DP & FOI Peter Hogan, Head of Corporate Affairs
Document Owner	Human Resources Unit
Document Approval	Sheila McClelland, CEO
Maintenance	Human Resources Unit
Distribution	Published on our Fiosrú website.

Revision Details			
Revision No.	Revision Summary	Date	Revised by
0.1	Draft version	26 Mar 2026	JC
0.2	DP & FOI Observations	01 Apr 2026	LH, JC
0.3	CEO & HoCA Observations	09 Apr 2026	SMcC, PH, SK, JC
0.4	SLT Approved	06 May 2026	JC
1.0	Publication Review	30 Jun 2026	SMcC, PH, JC



Fiosrú

Oifig an
Ombudsman
Póilíneachta

Office of
the Police
Ombudsman

Fiosrú, Office of the Police Ombudsman
150 Upper Abbey Street Dublin
D01FT73
0818 600 800 or +353(1) 871 6727
complaints@fiosru.ie
www.fiosru.ie