

**Minutes of Fiosrú Audit and Risk Committee**  
**29 September 2025**

Attendance	
<b>Committee</b>	Paul Dempsey (Chair), Tom O'Regan, Ray Dolan, Michele Larmour and Brian Doherty.
<b>Secretary</b>	Pauline Byrne
<b>Management/Staff</b>	Sheila McClelland (CEO), Jon Leeman (Interim Director of Complaints and Investigations), Peter Hogan (Deputy Director of Administration), Amanda McLoughlin (Head of Finance), Joanne O'Donohue (CRO), Alan Quinn (Project Manager, CMS) David McCormack (Head of ICT), Andrew Jones (Governance & Compliance) and Ellen Kenny (Data and Governance).
<b>Attendees via Zoom</b>	Robert Burke (Mazars).

**1. Committee Chair Opening Statement**

The Chair welcomed the newly appointed Deputy Ombudsman of Fiosrú, Office of the Police Ombudsman to his first Audit and Risk Committee (ARC) meeting.

The agenda was approved and no conflicts of interests were declared.

**2. Minutes and Matters Arising**

The minutes of the GSOC ARC meeting of 23 June 2025 were approved.

**3 Deputy Directors Updates**

**3.1 Complaints and Investigations**

The Interim Director of Complaints and Investigations briefed the Committee on the main developments since the last meeting, which include:

- The number of contacts from the public, admissibility decisions made and cases sent for investigation have increased significantly since the commencement of the Policing Security and Community Safety Act 2024 (PSCS Act, 2024) on 2 April 2025. There is an increase of 18.7% (monthly average) on new cases opened and when compared to figures for 2022 -2024, the percentage increase equates to 32.2%. At present, new complaints are averaging 100 per week.
- The number of cases awaiting decision has remained largely constant. Changes in process in the Casework Unit have led to increased productivity in decision making, with a 41% increase in decisions made every month. A restructuring of the Casework Unit, with redeployment of staff at Executive Officer grade to assist with admissibility decisions. In addition, an assessment process is undertaken to establish case priority.
- In relation to cases forwarded for investigation. There has been a 4% increase in criminal investigations and a 50% increase in non-criminal investigations post commencement. There has been a significant increase in Protected Disclosures received, through the Prescribed Persons channel.
- Currently, the number of submissions to the newly established Statutory Review Unit (SRU) has been lower than envisaged. It is intended that the outcomes of reviews conducted by the SRU and any lessons learned will be conveyed to the appropriate units.
- A competition is currently ongoing to fill the roles of Senior Designated Officer and Designated Officers for the Specialist Services Unit (SSU) to investigate Domestic Sexual and Gender-based Violence (DSGBV) cases. The remit of the SSU is currently under review, with a view to expansion.
- There is currently a competition underway for the position of acting Senior Designated Officer (SDO), to be deployed as an additional resource to the TRACE team.
- The development for a Standard Operating Procedure (SOP) for the Trace team is in the final stages. A review of all SOPs and guidance documents will commence in Q4 2025, with oversight from Senior Management.
- As a consequence of the Tierney Judgement and lessons learned, which is still proving to be a challenge on the workload of the Investigations Unit. A meeting is scheduled with Fiosrú's Head of Legal and the Office of the Director of Public Prosecutions (ODPP) for clarity on the format of files submitted by Fiosrú.
- The Learning and Development Unit have organised Levels 1, 2, 3 and 4 investigative interview training for Designated Officers.
- A recruitment campaign is due to be launched for Assistant Investigation Officers (AIOs) and Cork based Investigation Officers (IOs).
- With the welcomed arrival of the Deputy Ombudsman, managerial oversight of investigations is being reviewed.

There was a discussion on the existing challenges experienced due to, the increased workload experienced by both Casework and Investigations, the delays in the recruitment process and the absence of a new Case Management System (CMS), which was acknowledged by the Committee. There was a further discussion on whether Fiosrú had considered the use of Artificial Intelligence (AI) systems to address some of the issues faced.

### **3.2 Administration**

The Deputy Director of Administration (DDA) briefed the Committee on the main developments since the last meeting, including:

- The Senior Leadership Team (SLT) continues to closely monitor financial expenditure. The non-pay expenditure is currently very close to profile and budget holders have been asked to take steps to ensure there is no overspend. Expenditures relating to pay is currently behind profile due to the number of vacant positions.
- The 2026 Estimates it is anticipated that there will be a modest increase in the budget.
- The transfer to Financial Management Services as part of Phase 1 of Wave 2 is currently taking place and all processes are being closely monitored.
- A number of internal promotions have taken place to fill the positions of IO and AIO. These competitions were very successful and panels have been established, all of which have now been largely exhausted. These competitions have the added benefit of improving diversity within the investigative teams.
- Fiosrú, through its own recruitment licence, has successfully completed our first external recruitment competition to fill the senior post of Deputy Director of Strategy, Outreach and Engagement. The preferred candidate will join Fiosrú in Q4 2025.
- Preparations are underway to run a further three recruitment competitions using the recruitment licence, for Senior Legal Advisor, IOs in Cork and AIOs.
- New IO induction training is being rolled out to recently appointed IOs. This programme provides for validated on-the-job training under close supervision, supported by mentorship from experienced IOs.
- The 2024 Annual Report will be laid before the Oireachtas this week. The Annual Report for the period 1 January to April 2025 is in the final stages of drafting.
- A new Health and Safety Committee has been established to facilitate and encourage staff to engage in H&S issues in Fiosrú.

There was a discussion on the supports available to staff joining Fiosrú and the Committee noted that Fiosrú provides mentoring and peer support to all new staff

members. In addition, the probation assessment periods were outlined to the Committee.

The Committee thanked both the Director and Deputy Directors for their briefing.

#### **4 Risk Management**

The Chief Risk Officer (CRO) briefed the Committee on the Risk Register. In particular, it was noted that:

- The Q2 2025 Fiosrú Corporate Risk Register was submitted to and adopted by the Police Ombudsman; it was subsequently shared with all Fiosrú staff on 22 September 2025.
- Recommendation to close three risks was also approved. The closure of each risk, including the reasons for doing so is recorded on the Q2 Fiosrú Risk Register and will be included on the Risk Closure Register when adopted by the Police Ombudsman.
- Quarterly input was sought from risk and mitigating action owners this quarter, with returns to be made by 5 August 2025.
- On request by the Chief Executive Officer (CEO), members of the SLT were additionally asked to identify any new, changed and/or emerging risks in the context of Fiosrú and the PSCS Act, 2024.
- The Risk Monitoring Group (RMG) met on the 25 August 2025 to review the draft Corporate Risk Register and determine the risk rating and ranking.
- The draft Q3 2025 Fiosrú Risk register was submitted to SLT on the 8 September for input by 15 September 2025. The CEO provided further input on 11 and 16 September 2025 and the draft Q3 Risk Register was updated further. The proposed amendments were circulated to the SLT in advance of the SLT meeting on 17 September 2025. Additional input from the SLT was recorded and the Q3 Risk Register was finalised.
- The Committee noted the high-level organisation risks this quarter; New CMS Project, Lack of Resource Resilience, Knowledge, Information and Document management and Reputation Management.
- The Committee noted the organisational risk, Lack of Resource Resilience had increased in Q3 due to the difficulties recruiting experienced and specialist staff in certain business areas and the time it will take to upskill staff in new positions, together with the substantial increase in complaints made since commencement.
- The Committee noted the actions taken to mitigate an operational risk for potential harm to a child or vulnerable adult while availing of the organisation's services due to a vacancy created by the departure of a Senior Investigating Officer (SIO). Internal expressions of interest for the SIO role have issued and the Deputy Director, who has responsibility for this area has taken over supervisory responsibility while the role is vacant.

- The Committee noted that with regard to our statutory obligations under the National Archives Act, the position of Records Manager has been filled by internal promotion.
- The Fiosrú Risk Management Policy was approved by the Police Ombudsman on 5 June 2025 and circulated to staff on 18 July 2025.
- The CRO advised the Committee when the Fiosrú Statement of Strategy 2026 – 2028 is finalised, an additional review of the Fiosrú Risk Management Framework (Policy and Risk register) will be required, to link risks with Fiosrú's organisational strategic objectives. The Committee noted that Fiosrú is committed to considering the need and procure formal risk management training to embed a culture of risk management in the organisation.

The Committee thanked the CRO for their briefing. There was a discussion on some of the risk rating, which the Committee considered harsh, since mitigating actions had been taken and put in place. The Committee recommended that some of the rating could be reduced, with particular emphasis on the new Case Management System (CMS) and Lack of Resource Resilience.

## 5 ICT

The Head of ICT briefed the Committee on the main developments in the ICT unit. In particular it was noted that:

- The Information and Cyber Security Strategy was submitted and approved by the CEO. A Head of Cyber Security has been appointed and a huge body of work has been undertaken, which includes fourteen (14) policies and forty-seven processes. The ICT policies are currently with the DDA and the Policy Unit for sign off. All policies will be reviewed annually/bi-annually.
- Asset management classification and compliance monitoring is ongoing.
- Physical Security with includes patching, penetration testing and back up have been completed.
- Work is continuing on security training awareness tool, which will be used to measure and educate staff.
- Data loss prevention software is to be rolled out next week to all staff members. This software is an add-on to Microsoft Outlook and is applied when sending external email and attachments. The software forces the user to check the email address and attachment before sending it.
- There is a trial ongoing to determine the capabilities of the Sophos System. Once fully tested, capability will be presented to the CEO/SLT for signoff and follow on implementation.

- NISC 2 Training for CEO/SLT is to be arranged for Q4 2025.
- Incident Management – This is being refined to incorporate the overall Fiosrú organisation. Business Impact Assessments (BIA's) are currently out with relevant areas for documenting as part of the first stage of process.
- Internal audit is conducting a follow up audit on the recommending arising from a previous audit conducted in 2022. The follow up audit is due to commence on 20 October 2025.

The Committee thanked the Head of ICT for their briefing.

## 6 Case Management System (CMS)

The CMS Project Manager briefed the Committee on the main developments with the new CMS Project, it was noted that:

- Estimates for ongoing costs for the project have been drafted and submitted to the Department of Public Expenditure, Infrastructure, Public Services, Reform and Digitalisation (DPER) in the 2026 – 2030 Capital Plan and the outcome is awaited.
- The interim CMS is now active and is being monitored to address issues as they arise. Fiosrú is engaging with the current supplier of the CMS to establish the viability of a system upgrade of key PSCS components and functionality.
- The CMS project were notified that they were included as part of an audit by the Office of the Comptroller and Auditor General (OCAG) on the Department of Justice (DOJ) PMO. All relevant documentation has been provided to the DOJ.
- Diver 7 Reporting is continuing and training is targeted for the end of September 2025.
- A total of 42 first draft of business requirement documents (BRD) have been approved and signed off.
- Ways of working team focusing their project capacity on BRD development currently, however it is envisaged this may be impacted by Diver report testing.
- Work is continuing on the system reporting requirements, which are currently being validated.

The Committee thanked the CMS Project Manager for their presentation.

## 7 Internal Audit

### 7.1 GDPR Audit

The Mazars representative briefed the Committee on the finding of the General Data Protection Audit (GDPR) internal audit. The Committee noted that the audit identified one high finding and two medium findings and management accepted the findings.

The high finding related to Fiosrú's Record of Processing Activity (ROPA). The Committee noted that at the time of the audit work on the ROPA was continuing and has since been completed in line with the recommendations made. The medium findings related to the transparency notices on the Fiosrú website and Fiosrú's Data Retention Policy.

The DPO advised the Committee that the finding in relation to the transparency notices have now been completed in line with the audit recommendations. The Committee noted that work on the Data Retention Policy is continuing and since the commencement of the PSCS Act 2024, Fiosrú are now subject to the National Archives Act. Fiosrú have appointed a records manager to undertake this work, which requires a full review of the existing data retention schedules and engagement with the National Archives office.

The Committee thanked the auditor for their presentation and continued assistance.

## **7.2 Internal Audit Recommendations**

The Head of Finance informed the Committee that as part of Fiosrú's internal control environment, Fiosrú documents in the form of a spreadsheet, which is a live document, the recommendations made following audits conducted by internal audit. The Committee noted that as part of a recent review of the audit recommendations, there were forty-two (42) open recommendations, fourteen (14) of which have since been closed. The Committee were briefed on the status of the remaining open recommendations.

There was a discussion on the recommendation made by the OCAG relating to payroll. It was agreed that further discussion at the next ARC meeting with the Head of Human Resources (HR) was warranted. The Committee also recommended that an additional column should be added to the existing spreadsheet for recording completion dates.

The Committee thanked the Head of Finance for their presentation

## **8 Governance**

### **8.1 Draft Corporate Governance Framework**

The draft Corporate Governance Framework was circulated to the Committee members prior to the meeting.

The Committee made a number of observations as follows:

- The role of the Executive board to be articulated;
- The role of the Senior Leadership Team (SLT)
- Performance Management;
- Data Sharing;
- Financial Management – tax compliance;
- Stakeholder relationships;
- Organisational values; and

- The role of the ARC.

## **8.2 Audit & Risk Charter**

The Audit and Risk Charter was signed by the Chair of the ARC and the CEO .

## **9 AOB**

The Committee discussed a number of areas that they would like to cover at future ARC meeting and made the following recommendations:

From the operational side, each of the Deputy Directors of Complaints and Investigations to brief the Committee on risk in their area.

From an administrative side, heads of each of the different Business Units to brief the Committee on risk in their individual areas. It was agreed that the Head of the Legal Services Unit (LSU) and the Statutory Review Unit (SRU) would attend the next ARC meeting.

The next ARC meeting is scheduled for 8 December 2025 at 13:00 hours.

## **10 Closed Session**

The Committee and the CEO held a closed session.