

Policing and Community Safety Authority

Review of Recommendations
from the Garda Síochána Inspectorate
Inspection Report on

Countering the Threat of Internal Corruption





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Executive Summary

The Garda Síochána Inspectorate (GSI) report ‘*Countering the Threat of Internal Corruption in the Garda Síochána 2020*’ (GSI Report) examined the effectiveness of An Garda Síochána at preventing, detecting and mitigating against the threat of internal corruption. This review by the Policing and Community Safety Authority (PCSA) assessed the implementation of the report’s recommendations by An Garda Síochána in accordance with Section 122(2)(f) of the Policing, Security and Community Safety Act 2024. The terms of reference for the review are included in Appendix A.

The review found that of the 34 recommendations, 38 per cent (13) have been implemented, 18 per cent (six) are partially implemented, 41 per cent (14) have not been implemented and one was superseded by recommendations made in a review of Property and Exhibit Management conducted by the Garda Inspectorate in 2024.

Primary among those implemented are:

- A strategy and policy to mitigate the threat of abuse of power for sexual gain has been developed, published and implemented;
- An overarching policy and guidelines on professional boundaries for the garda workforce have been developed, published and implemented; and
- The Covert Human Intelligence Sources (CHIS) Management Policy has been revised to prohibit the acceptance of gifts or hospitality from a CHIS.

Among those partially implemented are the introduction of substance misuse testing. This is in place for trainees before entering service but requires enabling regulations to permit in-service testing.

Among those recommendations not yet implemented are some which may require underpinning legislation, such as in-service vetting and the proactive monitoring of use of IT systems. An Garda Síochána is developing a code of practice to inform in-service vetting in anticipation of the legislation being introduced, and this is welcomed.

There are several outstanding policies such as notifiable interests, business and other interests and conflicts of interest. Work is ongoing to introduce these on an incremental basis as part of an effort to manage the scale of change that such policies and procedures will bring to the garda workforce.



The Gifts, Hospitality and Sponsorship Policy requires immediate attention and finalisation, as there is some lack of clarity which is leading to differing interpretations of what is acceptable. The review of this policy remains ongoing within An Garda Síochána and needs to provide immediate clarity in relation to:

- Managing the risks associated with gifts received by personnel which are related to fundraising activities involving both community and Garda Síochána causes, including a garda social club;
- Whether vouchers for goods or services are treated in the same way as monetary vouchers; and
- Quantifying what is meant by a ‘gift’ or ‘hospitality’ of significant value.

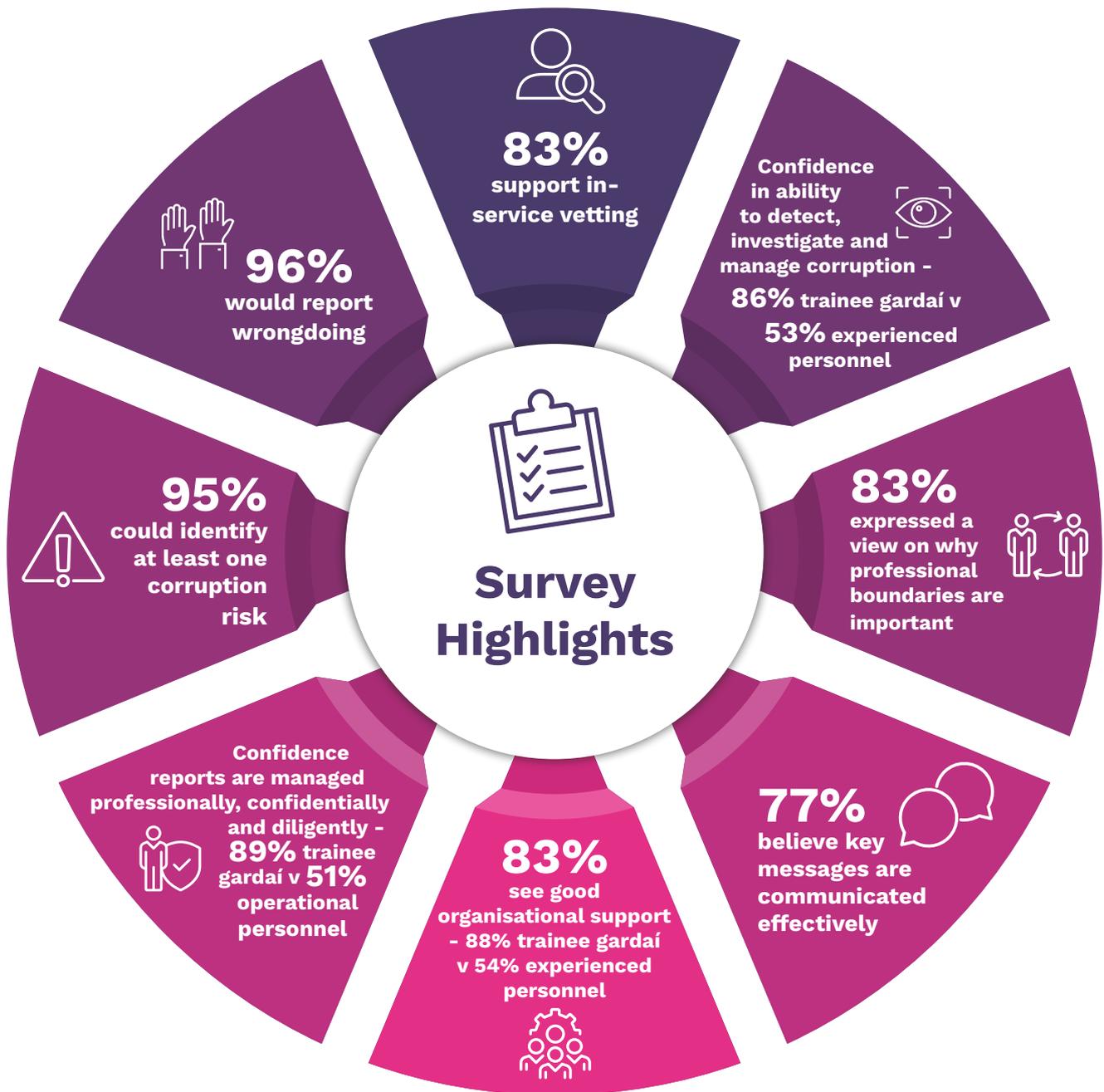
The Garda Síochána Inspectorate (GSI) report ‘Countering the Threat of Internal Corruption in the Garda Síochána 2020’ (GSI Report) examined the effectiveness of An Garda Síochána at preventing, detecting and mitigating against the threat of internal corruption.

Positively, since the 2020 inspection, there has been a reduction in the number of personnel accepting gifts of alcohol, although such gifts are still being accepted as part of fundraising work. However, this report identifies the inappropriate acceptance of individual gifts such as tickets for concerts or sporting events. While approved by managers at chief superintendent and principal officer level or above, such acceptance is not in compliance with the policy and that is in contrast with the other improvements identified in the review. This is disappointing, given the significant amount of progress and improvements identified across other areas of this review.

The review identified positive examples of early intervention by management to ‘nip in the bud’ behaviour that had the potential to result in disciplinary action. However, the development and introduction of an organisational early intervention support system has yet to be completed.

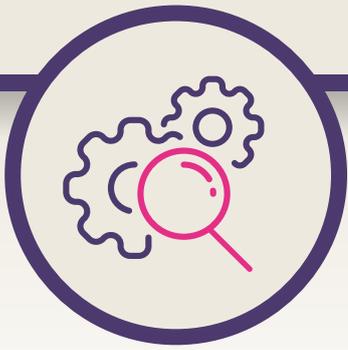
To help assess the level of understanding of the risk of corruption within the workforce and the cultural attitude to how it may be countered, the review team conducted a survey in four divisions, Organised and Serious Crime and two garda trainee intakes at the Garda College. This survey, albeit relatively small, reflects positively on the understanding of the risks and the culture of the organisation. However, it also highlights how confidence drops as personnel spend longer in the organisation, especially in relation to An Garda Síochána’s ability to detect, investigate and manage corruption and to do so with professionalism, confidentiality and diligence. Some key results are shown in Figure A. A more comprehensive report of the survey results is included in Appendix B.

Figure A: Key Results from the Countering Corruption Survey of Garda Personnel



Source: Policing and Community Safety Authority survey

The GSI 2020 report formed a strong foundation upon which to build the work by An Garda Síochána to counter the threat of internal corruption. This review found that the 19 recommendations assessed as either implemented or partially implemented reflected significant progress and improvement by An Garda Síochána. Implementation of the remaining recommendations is, however, essential to ensure that An Garda Síochána is prepared and equipped to prevent, detect and mitigate the threat of internal corruption.



1. Background

In September 2020 the Garda Síochána Inspectorate (GSI) published an inspection report entitled ‘*Countering the Threat of Internal Corruption in the Garda Síochána*’ (GSI report). The purpose of that inspection was to examine the effectiveness of An Garda Síochána at preventing, detecting and mitigating against internal corruption.

The GSI report relied on a commonly accepted definition of corruption used by a number of government agencies, departments and commercial entities within Ireland, namely



‘an abuse of a position of trust in order to gain an undue advantage’. Subsequently An Garda Síochána defined corruption as ‘the abuse of a position of trust in order to gain an undue advantage. Corruption includes the abuse of power by an individual, for private and/or organisational gain, favour, advancement or reward and/or that is inconsistent with the proper practice of an individual’s office, employment or responsibilities’.

Areas of specific focus for the GSI report included:

- a.** Maintaining professional boundaries and abuse of power for sexual gain;
- b.** Vetting, conflicts of interest and associations which should be notified to supervisors;
- c.** Special relationships such as covert human intelligence sources;
- d.** Monitoring and detecting misuse of the PULSE¹ and other IT systems;
- e.** Fixed charge penalties and the management of property and evidence; and
- f.** Substance misuse.

The GSI Report found that the Garda Síochána Code of Ethics sets guiding principles for An Garda Síochána but strategic governance work to counter the threat of corruption within the organisation was underdeveloped. There was no strategic analysis of corruption threats, and leadership responsibilities were spread across several functional areas, thus preventing the organisation from responding holistically to threats and risks. It also found that across the criminal justice sector there was no common understanding of the threat posed by corruption, and no formal process in place for agencies to communicate or cooperate.

Arising from the inspection conducted in 2020, 34 recommendations were made, 30 of which were directed to An Garda Síochána, three to the Department of Justice, Home Affairs and Migration (DOJ) and one to the Department of Transport (DOT).

1. PULSE (‘Police Using Leading Systems Effectively’) is the computer system used by An Garda Síochána.



2. Legislative Basis for this Review

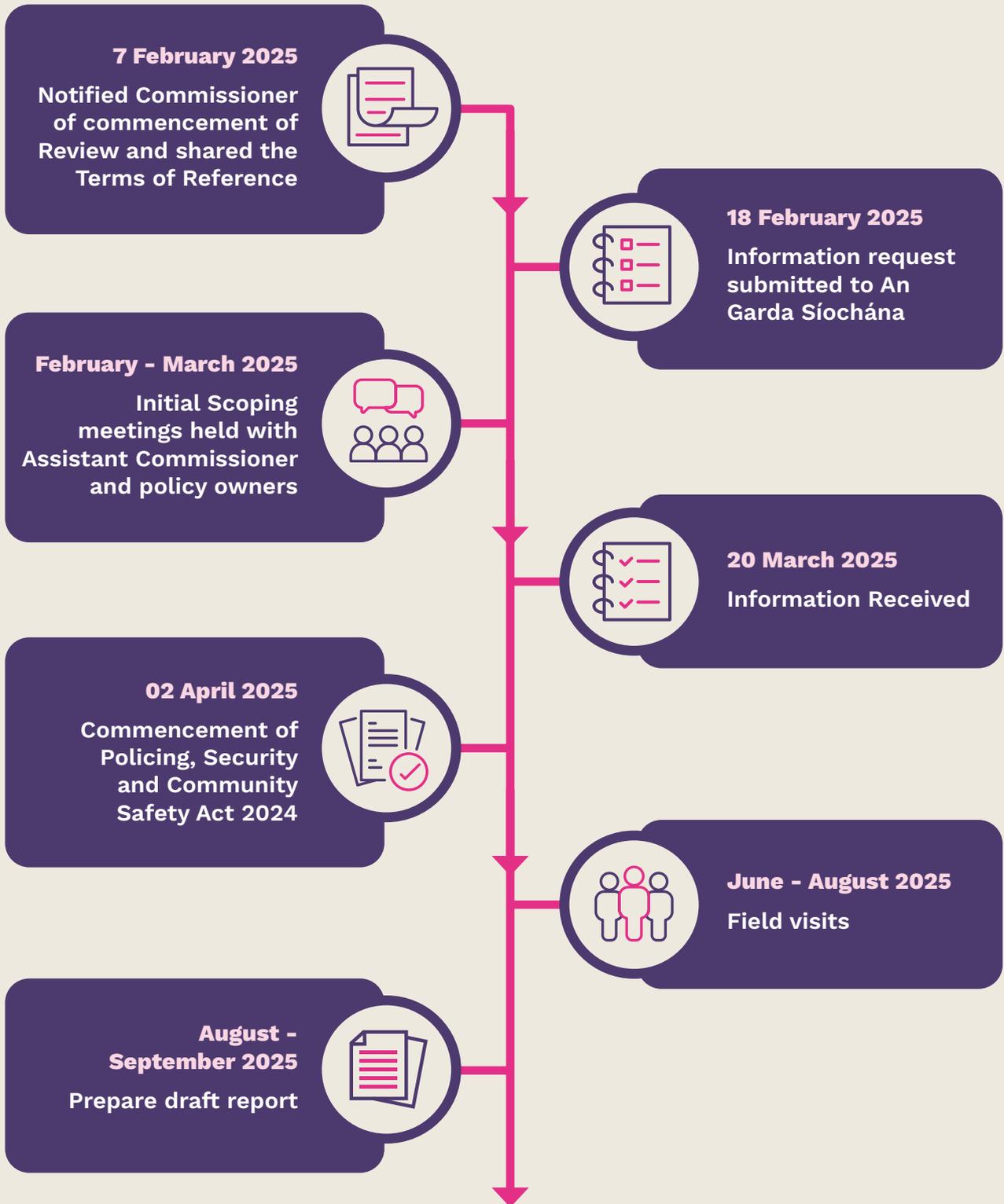
This review of the GSI Report Recommendations (Review) was commenced by the GSI and Policing Authority under Section 117(2)(a) of the Garda Síochána Act 2005. The PCSA completed the review under Section 122(2)(g) of the Policing, Security and Community Safety Act 2024, following commencement of this Act on 2 April 2025.

The original report included recommendations made to the Departments of Justice and Transport. Section 122(2)(g) does not enable monitoring of recommendations for a body other than An Garda Síochána. This review appreciates the updates provided by the Departments of Justice, Home Affairs and Migration, and Transport.



This review appreciates the updates provided by the Departments of Justice, Home Affairs and Migration and Transport.

Figure 1: The Review Timeline



Source: Policing and Community Safety Authority



3. Methodology

The review utilised a range of methods to gain a clear understanding of the extent of any work undertaken to progress the recommendations and to assess if any were implemented and, if so, whether they are achieving the intended outcome.

3.1 Review Process

The review process, shown in Figure 2, started with reading the original inspection report, the joint Department of Justice (DOJ) and An Garda Síochána implementation plan and updates from recommendation owners on their assessment of their progress. Terms of reference were drafted and shared with the Garda Commissioner.

The knowledge already gleaned, enabled preparation of an information request requiring An Garda Síochána to share all policy and procedural guidance documents relating to internal corruption and a detailed update on the progress of each of the 34 recommendations.

Upon receipt the information was examined to identify key stakeholders and plan for the interviews required to enable objective assessment of progress in implementing the report. The decision on which divisions to visit was made based on a number of factors, including geographical spread, divisions the PCSA had not recently visited and the inclusion of a national office. In this context, the review team visited:

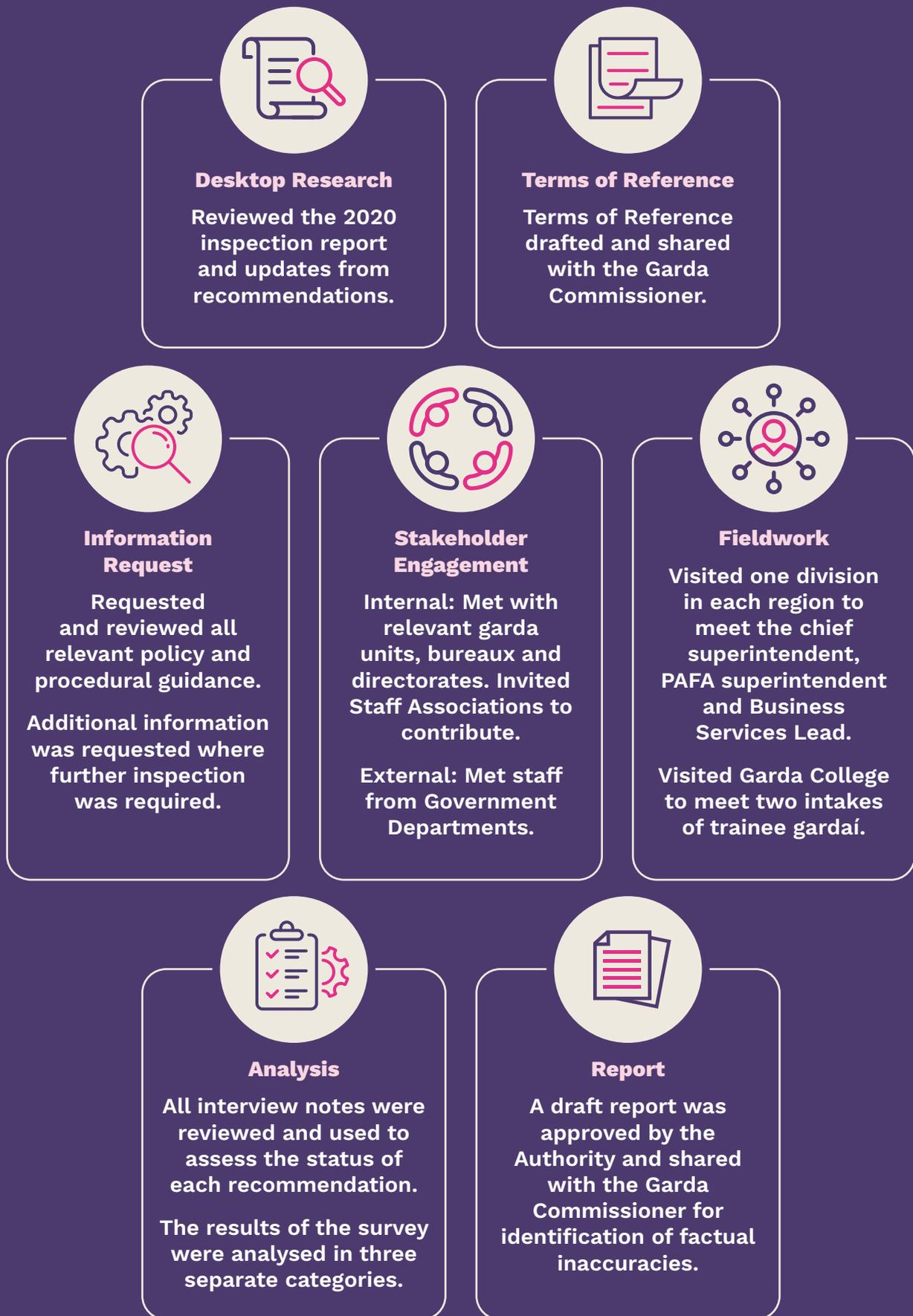
- DMR North Central Division;
- Meath/Westmeath Division;
- Mayo/Roscommon/Longford Division;
- Clare/Tipperary Division; and
- Garda College in Templemore.

In divisions, the review team met with chief superintendents and superintendents responsible for Performance and Accountability Framework Administration (PAFA) and business managers. In the college, the review team met trainee gardaí.

The review team also met with Garda Headquarters directorates and units which are responsible for performance, discipline and the investigation of corruption.

External stakeholder engagement was concentrated on recommendations originally made to the relevant department as well as key dependencies such as gaps in legislation, which had emerged since the publication of the original report in 2020. The results of all information gathering were analysed and assessments made on the implementation status of each recommendation.

Figure 2: The Review Process Methodology



Source: Policing and Community Safety Authority

A draft report, once approved by the Authority, was shared with the Garda Commissioner to allow him to identify any factual inaccuracies.

3.2 Engagement with Garda Personnel

A key part of the review process was the engagement with garda personnel to explore the impact of the work undertaken and any changes to the operational culture as a result of the GSI report. This was done in each of the four divisions selected and the selected national unit (Organised and Serious Crime) through an electronic survey conducted anonymously. There was also engagement with two intakes of trainee gardaí in the Garda College.

The trainees were from a new intake which had only completed five weeks of training and from an intake which had just returned from their nine weeks deployment to experience operational work in a division.

The purpose of the survey was to gain better insight into the views, opinions and experiences of members and to explore a range of topics relating to corruption. To encourage participation and honesty all answers were provided anonymously. Overall, the survey is considered to have received a satisfactory response rate of 362 respondents, which is set out in Figure 3 below. However, it is acknowledged that the overall results are skewed towards those within the college (Group A and B). They are therefore treated separately.

Figure 3: Breakdown of survey responses

Group	Description	Responses received
Group A	Intake of trainee Gardaí with five weeks of training	126
Group B	Intake of trainee Gardaí returned from nine weeks deployment	76
Group C	Experienced operational personnel (65% of those responding had 10 years' service or more)	160
Total Responses		362

Source: Policing and Community Safety Authority

The results from these surveys is provided in Appendix B. The full range of engagement is shown in Figure 4 below.

Figure 4: The Range of Engagement



Source: Policing and Community Safety Authority



4. Findings and Assessment

The GSI Report of 2020 used five chapter headings to group its recommendations, as set out in Figure 5. This review follows that approach and assesses the recommendations sequentially within each of the five chapters.

Figure 5: The five chapter headings



Source: Policing and Community Safety Authority

Overall, this review found significant progress made by An Garda Síochána in respect of advancing the recommendations. There are 13 fully implemented recommendations, one superseded by a subsequent review and a further six are partially implemented. However, full implementation of the remaining 14 recommendations remains crucial to continue to build, improve and embed a culture to counter the threat of internal corruption.

This review’s assessment of the implementation status of the 34 recommendations is shown in Figure 6.

Figure 6: Implementation Status of Recommendations

Status of Recommendations	Number			Total	Percentage
	An Garda Síochána	Department of Justice, Home Affairs and Migration	Department of Transport		
Implemented	12	1	0	13	40%
Superseded	1	0	0	1	3%
Partially Implemented	5	0	1	6	17%
Not Implemented	12	2	0	14	40%
Total Recommendations	30	3	1	34	100%

Source: Policing and Community Safety Authority

An assessment of each recommendation within its relevant chapter can be found in the following sections.

4.1 Chapter 1 – Strategy and Governance

Strategic understanding of the threats posed by corruption and having robust governance arrangements in place to respond to those threats are key elements to combatting corruption. However, An Garda Síochána do not operate within the criminal justice system alone, so therefore a wider understanding of threat across the sector is required.



Recommendation 1

The Department of Justice should develop a strategic understanding of the risk of internal corruption across the criminal justice sector with the objective of developing an overarching strategy and multi-agency approach to the management of corruption threats.

Findings

A number of approaches have been considered to develop a strategic understanding of the risk of internal corruption across the criminal justice sector, and it is reported by the department as remaining under consideration.

X Assessment: Not implemented

An overarching strategy and multi-agency approach has not been developed.



Recommendation 2

An Garda Síochána should develop and implement a governance process for identifying and mitigating the threats, risks and potential harms associated with internal corruption. This was to include senior police leader responsibility for countering corruption, the development of a strategic assessment of corruption threats and setting a counter-corruption control strategy.

Findings

An Garda Síochána has implemented a governance process led by the Deputy Commissioner with responsibility for Security, Strategy and Governance and conducts a strategic assessment of corruption threats through the Strategic Threat Risk Assessment (STRA)². The STRA and strategy are reviewed periodically and provide a roadmap for prioritising actions. While a framework has not been implemented, the roadmap provided by the strategy and STRA meets these obligations and the appropriate support structure is in place.

2. A process through which an organisation identifies, evaluates and manages threats and risks that may impact on its goals.

To date, two STRAs have been completed by the Garda Anti-Corruption Unit (GACU). This review found that the threats and risks identified and the accompanying analysis demonstrated an in-depth awareness and understanding of the threats facing the organisation.

 **Assessment: Implemented**

4.2 Chapter 2 – Enhancing Professional Integrity

An Garda Síochána provides a service to the citizens and communities of Ireland. A key element of providing a quality service is being accountable and guided by principles of respect for human rights and transparency in how those services are provided. This review looked at An Garda Síochána's work in promoting professional integrity through the training provided, maintenance of its organisational registers and the policies the organisation has in place.



Recommendation 3

An Garda Síochána should develop, publish and implement an overarching policy and guidelines on professional boundaries for the garda workforce.



Recommendation 4

An Garda Síochána should develop, publish and implement a strategy and policy to mitigate the threat of abuse of power for sexual gain. This policy should highlight the dangers of relationships where a position of power can be abused for emotional or sexual purposes. It should also provide guidance for the garda workforce and supervisors on the key indicators of such relationships and the appropriate organisational response to the issue.

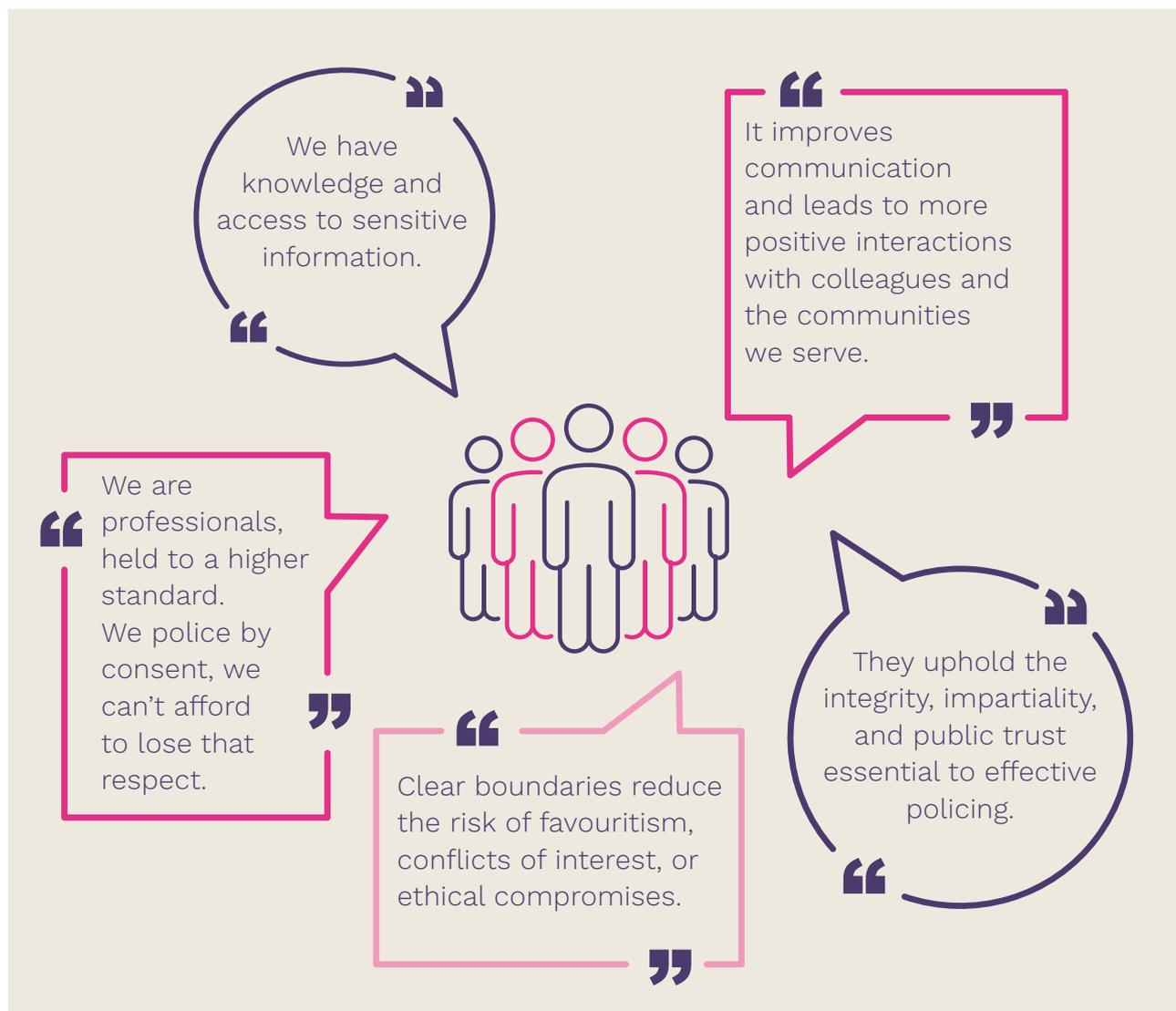
Findings

Both recommendation 3 and 4 are assessed together as An Garda Síochána deal with both professional boundaries and abuse of power for sexual gain under one policy. A Professional Boundaries and Abuse of Power for Sexual Gain Policy has been developed and was published in June 2021. This policy has been reviewed within the period committed to and has been further updated since the commencement of the Policing, Security and Community Safety Act 2024. Key indicators to help identify and understand abuse of power for sexual gain are included in the blended learning modules and were clearly referenced during GACU briefings attended by the review team. The latest version of the policy has changed the title to Professional Boundaries and Abuse of Power for Sexual Purposes.

This review has found that 81.5 per cent of all garda personnel have completed this online training module. A further 16.5 per cent have commenced the online training package but not yet completed it.

The survey conducted by this review attracted a particularly strong response from respondents when asked to identify why professional boundaries are important. An example of responses is provided in Figure 7.

Figure 7: Reasons provided for why professional boundaries are important



Source: Policing and Community Safety Authority survey

✓ Assessment: Implemented



Recommendation 5

An Garda Síochána should develop, publish and implement a policy and guidelines on notifiable associations which all members of the garda workforce are obliged to report.

Findings

The notifiable associations policy is drafted but not yet finalised or submitted for approval.

Assessment: Not implemented

The policy remains under development and incomplete within An Garda Síochána. As such, the blended learning approach and awareness briefings which were required to accompany the completed policy have not been developed.



Recommendation 6

An Garda Síochána should revise its Covert Human Intelligence Sources (CHIS) Management Policy to prohibit the acceptance of gifts or hospitality from a CHIS. This was required to reinforce the obligations in other related garda policies dealing with professional boundaries, relationships and associations, with an emphasis on the management of CHIS. In particular, the revised policy should impose an obligation on garda members to disclose all relationships with a current or former CHIS.

Findings

A review of the CHIS policy and procedure documents was completed and an updated policy introduced in 2022, replacing the previous Code of Practice. The implementation of this policy is supported by a three-week bespoke training programme for CHIS handlers. At the time of writing, 73 per cent of all CHIS handlers had completed the course and the remaining 27 per cent had attended the pre-selection training course and were awaiting a date to attend the training programme. The procedure document was found to be clear and unambiguous in its 'explicit prohibition' of the acceptance of gifts, hospitality and sponsorship and on entering any relationship with a current or former CHIS. The documents also carefully consider the risks and human rights of CHIS and their handlers. Central governance and management of these processes appeared to be strong, but due to the nature of this work, this review cannot say that this guidance is always followed in practice.

Assessment: Implemented



Recommendation 7

An Garda Síochána should develop, publish and implement a substance misuse and testing policy and procedure. As a first step, all new entrants should undergo mandatory pre-employment testing as a condition of their employment.

Findings

A Substance Misuse (Controlled Drugs) Policy was published and implemented in June 2021. Substance misuse testing for new trainees prior to entry to the Garda College commenced in 2023. An Garda Síochána has progressed this work as far as possible. A Substance Misuse (Controlled Drugs) Procedure is under development pending commencement of the required legal regulations. The regulations to enable testing for substance misuse for existing personnel remain under development at the DOJ and have not yet been finalised.



Assessment: Partially implemented

An Garda Síochána cannot progress this further until the draft regulations are finalised and commenced by the Minister.



Recommendation 8

An Garda Síochána was required to develop, publish and implement a policy and guidelines on the declaration, recording and management of conflicts of interest.

Findings

The conflict of interest policy has been drafted but not yet finalised or submitted for approval.



Assessment: Not Implemented

The policy remains under development and incomplete within An Garda Síochána. As such, the blended learning approach and awareness briefings which were required to accompany the completed policy have not been developed. This policy and the accompanying learning and awareness package needs to be progressed and implemented.



Recommendation 9

An Garda Síochána should raise awareness of the garda policy on gifts, hospitality and sponsorship, both within and outside of the organisation and take steps to ensure full compliance with the policy among the garda workforce. This required GACU to take policy ownership, monitor monthly returns and triangulate entries against other sources.

The registers were to be audited and the responsible manager and recipient challenged in relation to selected entries. The gifts, hospitality and sponsorship registers should be published, including when there is a nil response. Entries offered to or received by ranks from superintendent and assistant principal and above should be published in such a way that the person concerned can be clearly identified. This should extend to inspectors who regularly exercise the functions of a superintendent. All other gifts should be published against the relevant division/department.

Gifts, hospitality and sponsorship should not be accepted from organisations that could be subject to a non-public duty charge, those with a commercial relationship with the Garda Síochána, or those subject to statutory oversight by An Garda Síochána.

Findings

The existing policy and procedures document requires all principal officers, chief superintendents and above to retain a register and to submit a monthly return to Human Resources and People Development (HRPD) for publication on An Garda Síochána's website.

The policy also makes clear that personnel are not required to record the provision of refreshments where payment would not normally be expected, such as the hospitality so often shown by households or during work-related meetings. This is sensible and reflective of international best practice.

The policy states that *'garda and civilian staff may not solicit gifts or hospitality, directly or indirectly'* it also states that garda and civilian staff *'may not accept any gifts, gratuities, favours, discounts, subscriptions, hospitality or sponsorship, which might be seen or perceived to compromise their duties now or in the future'*. It also explains what gifts or hospitality must not be accepted, which include:

- anything that could compromise the impartiality of personnel;
- gifts from any person or business holding licences whose business comes in any way under garda supervision;
- cash;
- gift cheques or any vouchers that may be exchanged for cash; and
- any alcohol, of any value.

This review examined five individual registers and found that they comprised an Excel database or a collection of emails containing the regular returns submitted to HRPD. Two registers recorded a single entry each and the remaining three registers recorded a nil return for the six months from January to June 2025. Given the four divisions cover one Dublin division and seven counties, there being only two disclosable gifts is not credible. There is therefore a concern that the registers are not being comprehensively completed.

In addition to this, several issues arise:

- The registers are not being routinely published, and for the period from 2021 to date, only six of the monthly registers with quite limited information dating to the first half of 2021 have been published. While it is understood this non-publication is due to a legal issue, publication of registers is extremely important, as it provides transparency to the public and scope for incomplete disclosures to be identified.
- This review examined the central service database containing all returns from across An Garda Síochána and it was found that since 2021 over 50 per cent of the gifts were accepted in contravention of the policy and procedures document. Most significantly, all approvals to accept a gift are provided by a chief superintendent, principal officer or above. Failure by these ranks or grades to comply with the policy casts a significant shadow over the extent of compliance by the rest of An Garda Síochána.
- Examples of inappropriate acceptance of individual gifts were identified. These included acceptance of tickets for events, including pop concerts and sporting events.
- On a positive note, there has been a reduction in accepting gifts of alcohol, unless they were offered as part of fundraising work to support charitable causes. From 2022 to 2024 over 47 per cent of the gifts accepted related to items for charitable or community events. The detail in relation to who or what was to benefit includes a Christmas senior citizens party, a district social club, a raffle and a fundraiser. The support shown by An Garda Síochána personnel for charitable and community events is commendable. However, there are two risks to this which are deserving of comment. Firstly, the accepted gifts which are cited as charitable fundraising, may come from businesses such as pubs and restaurants which come into professional contact with An Garda Síochána due to requiring an alcohol or other licence or needing service. Secondly there was no evidence to indicate whether the gifts were offered by the business or requested by An Garda Síochána or if undue influence was applied by either An Garda Síochána or the businesses. Accepting or lobbying for such gifts enhances significantly the risk that the balance of the scales in the relationship is affected and one party or the other may feel unduly obligated.
- The policy is not clear in relation to what is appropriate concerning fundraising activity and how any risks associated with it can be managed.
- The reference in the policy to vouchers is vague and it would benefit from being clarified as it refers to 'vouchers which can be exchanged for cash' not being accepted. However, in practice, most vouchers are exchangeable for goods or services with a financial value, so the same risks would seem to pertain.
- While the policy prohibits acceptance of any gift or hospitality of significant value, this is vague and should be clarified for ease of interpretation by garda personnel.
- Triangulation by HRPD against other sources such as procurement and standards in public office declarations is not happening.
- HRPD still retain responsibility for this policy. It is understood that a review is ongoing and is intended to be completed during 2025, at which point the plan is to transfer ownership to GACU.

Assessment: Not Implemented

The requirements of the original recommendation have not been met.



Recommendation 10

An Garda Síochána should develop, publish and implement policy and guidelines relating to the holding of business and secondary interests by the garda workforce, including a requirement for members of the garda workforce to declare all personal commercial interests and those involving family and friends to the Garda Commissioner. This is to replace the prohibited spare-time activities guidelines with an objective and transparent principles-based approach to secondary employment.

Findings

The Business Interests and Secondary Occupations Policy has been drafted but not yet finalised or submitted for approval. A list of prohibited activities that garda members should not engage in has been published.

In addition, The Council of Europe's Group of States against Corruption (GRECO) report³ published in February 2023, recorded that not only should there be an adequate system to authorise those activities, but also to check regularly that they still correspond to what has been authorised and that no conflict of interest has arisen over time. They recommend *'that authorised secondary activities of garda members be duly recorded and that regular checks be undertaken thereafter'*.

Assessment: Not Implemented

The policy remains under development and incomplete within An Garda Síochána. As such, the blended learning approach and awareness briefings which were required to accompany the completed policy have not been developed.

An Garda Síochána also need to review the prohibited spare time activities guidelines, including any potential legislative requirements to replace them. The inclusion of this issue in the GRECO Fifth Round Evaluation Report emphasises the need for this work to be progressed.



Recommendation 11

An Garda Síochána should ensure there is clarity about the completion of the Ethics in Public Office declarations by personnel appointed to positions designated under the Ethics Acts and those regularly designated to temporarily perform in a higher rank as assistant principal or superintendent.

Findings

This policy area was transferred from Finance to GACU. Guidance was issued to personnel and an effective process exists and is managed by senior leadership to challenge incomplete or unsubmitted returns. GACU also effectively manage completion of Standards in Public Office (SIPO)⁴ declarations. This includes nil or incomplete returns and failures to submit returns.

Assessment: Implemented

3. [GRECO Fifth Round Evaluation Report](#)

4. SIPO declarations are a statutory declaration made by individuals appointed to or running for certain public offices to confirm their compliance with tax obligations.



Recommendation 12

The Department of Justice should carry out a review of post-employment activities of the garda workforce and develop suitable rules and processes to reduce the risk of conflict of interest arising after a member of the garda workforce leaves the organisation.

Findings

Work to review post-employment activities of the garda workforce and to develop suitable rules and processes to reduce the risk of conflict of interest arising post-retirement has not been progressed.

In addition to the requirement in the GSI report, *The GRECO Fifth Round Evaluation Report* (2023) recommendation xvii referred to the fact that the post-employment restrictions set out in the Regulation of Lobbying Act do not apply to any members of An Garda Síochána. GRECO considered that the absence of any rules on post-employment restrictions for garda members, be it in terms of lobbying or employment in a sector where the member could have potentially taken decisions favourable to the future employer, ought to be carefully considered. Accordingly, GRECO recommended examining risks of conflict of interest faced by garda members leaving An Garda Síochána and taking employment or offering services thereafter and establishing rules as appropriate.

X Assessment: Not Implemented

There has not been any research commissioned into the issue of post-employment activities for the garda workforce or any analysis of current practice of An Garda Síochána and best international practice. The views of key stakeholders have not been sought on how the outcome of the research might be implemented and therefore, no rules and processes have been developed to reduce risks of conflicts in line with wider public policy and best practice. This issue is referred to in the *GRECO Fifth Round Evaluation Report*. It is recognised that progressing this recommendation may present constitutional challenges, so it is suggested that a review is undertaken and a decision made as to whether a lawful solution can be found. It is expected that any review will enable a conclusion to be reached in respect of this recommendation.



Recommendation 13

An Garda Síochána should undertake periodic integrity health checks of the garda workforce. These should occur if not on an annual basis at the very minimum, but also at critical career points, such as on promotion or selection for specialist or designated positions.

Findings

This review found that An Garda Síochána is focussing on vetting as the approach to meeting the requirements of this recommendation, but the 2020 report referred to international practice where integrity health checks were part of the annual performance review for personnel. This recommendation required a scoping exercise to explore the introduction of checks in An Garda Síochána, benchmarked against international best practice and a consultation with key stakeholders, associations and unions to support development of policies and internal structures to facilitate the introduction of checks.

Assessment: Not Implemented

The approach of An Garda Síochána to this recommendation has been to focus on the requirements for Recommendation 14. This review considers that this recommendation is much simpler. Addressing the absence of effective performance management has the potential to achieve significant progress with this recommendation.

4.3 Chapter 3 – Building Organisational Resilience

The 2020 report identified misconduct and corruption as the product of organisational weakness and wider systemic failures in policing, rather than through the actions of certain individuals. While discipline is an important tool, it often fails to identify other persons implicated in wrongdoing or the full scale of the corrupt behaviour itself. It also fails to hold supervisors to account, and it does not confront structural problems in policing itself.



Recommendation 14

An Garda Síochána should develop a single policy and approach for vetting the garda workforce and those contracted to provide services. This was to be conducted by a vetting section within GACU and to allow for a vetting review of anyone in the garda workforce at the discretion of the Head of GACU. It was to include a tiered level of vetting to take account of access to police systems and identified threats and to include pre-employment and regular in-service reviews at times, such as appointments to designated or vulnerable posts or promotion. Staff in designated or vulnerable posts were to be subject to additional vetting and provided with ethical training and supports.

Recruitment vetting was to include the European Criminal Records Information System, credit checks, financial intelligence, social media, convictions by other state bodies, military records and other police disciplinary records if appropriate.

All contractors providing a service to An Garda Síochána were to have personal vetting at an appropriate level. GACU were to be responsible for assessing all information relating to an individual where a risk has been identified during vetting, and to provide a recommendation to the Garda Commissioner on the appropriate action to take.

Findings

There is no single policy in place and vetting is conducted in various ways within An Garda Síochána. The Garda National Vetting Bureau (GNVB) is responsible for vetting all successful applicants recruited to join An Garda Síochána and community members who work with children or vulnerable people.

Checks of criminal and disciplinary records are performed by HRPD as part of the competition process upon promotion or transfer to specialist roles. There is not a significant difference between vetting on recruitment and the limited additional vetting introduced for existing members promoted or appointed to some specialised positions. In-service vetting does not include checks in relation to access to police systems, financial threats, social media presence and any new associations which may enhance the threat or risk. A draft schedule of critical roles is available, though not yet approved by the Senior Leadership Team.

A vetting section has been established within GACU and is currently undertaking preparatory work in advance of the introduction of legislation to empower in-service vetting. For example, it is anticipated that a code of practice will be required and this section is currently working on drafting that document. Upon commencement of the anticipated legislation, it is envisioned that all in-service vetting – including security clearance – will be managed and decided upon by GACU.

This review was encouraged by the support for in-service vetting among survey respondents, with 83 per cent agreeing that in-service vetting should be introduced for garda personnel. The full response to this question is shown in Figure 8.

Figure 8: Attitude to introducing in-career vetting

Should An Garda Síochána introduce in-career vetting for members and staff?	Yes	No
Group A – New trainees	88%	12%
Group B – Operationally deployed trainees	76%	24%
Group C – Experienced operational personnel	83%	17%
Overall	83%	17%

Source: Policing and Community Safety Authority Survey

Where this review enquired about contractors working with or within An Garda Síochána an assurance was provided that in each case they had been vetted.

A review of the GNVB process has been undertaken by An Garda Síochána. At the time of writing this report, the vetting review was under consideration by the Chief Corporate Officer and while a copy was requested, it was not provided. It is understood that the vetting review contains several recommendations for change and is accompanied by a programme of work to implement that change. An early decision was made to implement one recommendation in the vetting review to strengthen the rigour and integrity of vetting by separating the processing and decision-making roles.

An Garda Síochána’s capacity to deliver the volume of vetting required within the necessary timeframes has proven to be an insurmountable challenge and has resulted in new trainees entering their foundation training as gardaí prior to the conclusion of their vetting process. Theoretically this means that students who are subsequently found to be unsuitable would have to leave their training course. At the time of writing, the review team found that, so far, no trainee gardaí who have entered the Garda College prior to conclusion of this process have subsequently been found to be unsuitable.

X Assessment: Not Implemented

A steering group for in-service vetting has been established, but due to legislation being required to empower in-service vetting, a framework has yet to be finalised. The plan for the introduction of in-service vetting remains in its early stages and is slow-moving without this legislative change.



Recommendation 15

An Garda Síochána should ensure that all property stores have adequate systems, processes and facilities to achieve the safe and secure management of property. This includes effective training and security advice for property store managers, secure separated storage for hazardous and high-value property and a security system for recording the details of anyone who accesses the property store. An approved system for managing property when the property store is not open is also required.

Findings

In 2024 the Garda Síochána Inspectorate and staff from the Policing Authority conducted a review of Property and Exhibit Management Systems (PEMS) in An Garda Síochána. Subsequently, eight recommendations were made. These were developed to build on the progress made to date and to further enhance processes, structures, training and resources relating to PEMS. The eight new recommendations made following the 2024 review will be monitored separately.



Assessment: Superseded by subsequent 2024 PEMS review.



Recommendation 16

An Garda Síochána should introduce a practice of recording contemporaneously property seized during a search and, on completion of the search, leaving a record with a person present at the search site.

Findings

The current PEMS⁵ IT system does not have the capability to operate in a manner that enables the production of contemporaneous records at search sites. As a result, guidance is provided to members conducting searches to the effect that all items seized are required to be accurately recorded on an exhibits chart. This chart does not have a duplicate facility which would enable leaving a copy with a person present at the search site.

Upgrades are planned for PEMS2, but at the time of writing there was no timescale available or indication if the proposed update would resolve this recommendation.



Assessment: Not implemented

An upgrade is required for PEMS2.

5. PEMS2 – Property and Exhibit Management System version 2 used to manage all seized and found property and exhibits.



Recommendation 17

An Garda Síochána should develop and publish a Lawful Business Monitoring Policy and acquire technology that enables the proactive surveillance of IT systems to prevent and detect the misuse of information held within them.

Findings

A scoping exercise around a Lawful Business Monitoring Policy was conducted, including engagement with other policing services. However, legislation is required to empower the processes required to conduct lawful business monitoring of garda IT systems and therefore the policy has not progressed. When enabling legislation is in place a multi-million-euro IT investment may be required. An Garda Síochána have been seeking legal advice as to whether this can be introduced.

X Assessment: Not Implemented

Some consultation has taken place and it has been established that legislation and significant financial support for IT may be necessary. Implementation of this recommendation is needed to empower the actions necessary to enable proactive surveillance.



Recommendation 18

An Garda Síochána should assign responsibility to the GACU for identifying and challenging misuse of information and communications technology devices and systems by the garda workforce. This was to include proactive monitoring of all garda information and communications technology devices and systems based on intelligence, analysis and organisational learning, as well as reviewing an individual's use of garda information and communications technology systems, following identified or suspected unethical behaviour or misconduct by that member of the workforce.

Findings

Proactive identification of the misuse of information and communications technology is not legislatively enabled and therefore not happening. Reactive intelligence-informed investigations are happening in specific cases where concerns have been raised of inappropriate access. In cases where members inappropriately access incident logs proactive challenge takes place, and this can range from advice and guidance to full disciplinary investigation.

For some sensitive incidents recorded on PULSE, access is routinely limited to a small group of members or staff. Additional incidents can be limited if the division has the Investigative Management System but not if they are still working solely with PULSE. However, there is no guidance on which crime types or incidents should be restricted to limited access.

X Assessment: Not Implemented

The consultation relating to legislative and IT requirements have been progressed to some degree, but proactive monitoring is now the subject of a request for legal advice. Reactive investigation is happening in appropriate cases.

The importance of information security cannot be overstated. It is a confidence issue for any law enforcement organisation. Mitigation of this risk can be enhanced through developing,

implementing and communicating guidance on the types of crimes and incidents that should be restricted from the initial point of recording on PULSE. This guidance should not only include the usual categories of serious crime, but also cases that are sensitive, due to the context or individual circumstances. To ensure appropriate oversight, restricted PULSE records should be included as a point for discussion at Performance and Accountability Framework Administration (PAFA) meetings.



Recommendation 19

An Garda Síochána should strengthen the supervision of cases it prosecutes. This was to include introduction of suitable guidelines and procedures to improve record-keeping, in particular a requirement to explain in detail a garda decision to discontinue a case and to record explanations for a case being struck out in the District Court. In addition, reviewing discontinued cases is to form part of the divisional Performance and Accountability Framework (PAF) review process to identify patterns or performance concerns.

Findings

The 2020 report highlighted that garda management were unable to identify the reason for discontinuation of court proceedings in all cases. A case can be disposed of in several different ways:

- **Discontinued**, which is where the case is closed, and the prosecution is no longer being progressed through the courts. This is achieved through completion of Form RN-S01 which is completed by the member who identifies the requirement to discontinue the case. It is submitted to the PAFA Superintendent who assesses it and provides a direction prior to the court date in question.
- **Withdrawn**, which is where the court presenter indicates to the court that they wish to withdraw the case, usually by offering no evidence. An example is a case of no motor insurance, where the driver produces valid insurance in advance of the court hearing. The Form RN-S01 should also be completed in this instance.
- **Struck out**, which is where the judge decides to remove a prosecution case from the court list. This may be due to the garda member or witnesses failing to appear on a hearing date, or where an issue arises with an exhibit – for example CCTV footage corrupted and unable to be played for the court or a medical report not received in advance of the set hearing date.
- **Dismissal**, which is where the judge decides that there is not sufficient evidence presented to the court to prove the guilt of an individual and dismisses the charges.

A directive issued in 2022 introduced a process of governance, oversight and accountability. This requires that members provide a comprehensive explanation for requesting a case to be discontinued. Form RS-NO1 was used to make this application in all divisions inspected.

The directive also states that chief superintendents will ensure that court outcomes and PULSE incidents are regularly included in inspections and reviews. This practice is currently in operation.

A further directive issued in 2024 requires superintendents and heads of sections to conduct comprehensive evaluations of performance within their district, including court matters.

Discontinued court cases are reviewed as part of the PAFA process. Good examples were found by this review to provide assurance that this is being upheld.

Difficulties were identified in garda management's ability to identify the reason for discontinuance in all cases. This can be due to non-attendance of a garda member, or a decision made by a judge. This review found a spreadsheet manually completed for each court by the court presenter. There was no assurance provided that this manual record was being used to update the PULSE case record in every instance, resulting in an inability to use or rely on PULSE as a means of assessing and measuring performance relating to discontinued cases.

The local solutions implemented to monitor and review this issue are very bureaucratic. One division visited proposed a simple drop-down menu on PULSE as an IT solution. They proposed that it contain a selection of reasons for discontinuance to be completed by the presenting member. This proposal is considered to have merit and should include reasons such as garda member failed to appear, witness failed to appear and exhibits were not available. This could also be used by An Garda Síochána to monitor performance.

Assessment: Partially Implemented

Guidelines and procedures have been implemented and monitoring has been embedded in the PAFA process. However, there is no assurance that there is either an effective means of understanding if a case is discontinued due to a garda member failing to attend court, or proper records being maintained of the reasons for discontinuance to enable action to be taken if required. The label of 'withdrawal', 'struck out' or 'dismissal' is usually applied, but not the reason why such action was taken. The proposal to introduce a drop-down menu on PULSE should be progressed.



Recommendation 20

The Department of Transport (DOT) should undertake a review of the current statutory exemption relating to the driving of vehicles by members of the emergency services.

Findings

The DOT conducted a review of the statutory exemption relating to the driving of vehicles by members of the emergency services (Section 87 of the Road Traffic Act 2010). As a result, legal advice was sought and it concluded that the wording of section 87 should be strengthened. The DOT is progressing a new Road Traffic Bill which will include a proposal to amend section 87. The precise wording of any amendment will be the subject of consultation with other relevant stakeholders and agreed with An Garda Síochána and the DOJ prior to its inclusion in the Bill. It is understood that the Minister for Transport intends to bring the General Scheme of the Bill to Cabinet for approval in early 2026.

Assessment: Partially Implemented



Recommendation 21

An Garda Síochána must ensure that the process for cancelling a Fixed Charge Penalty Notice (FCPN) on the basis of a statutory exemption should consider all of the relevant conditions, including those set out in regulation and policy, and be properly documented. This included more rigorous use of the exceptional circumstances test to balance the proportionality of members' actions when breaching road traffic laws. This was to take into consideration all risk and mitigating factors and the greater use of vehicle data in decision-making around driving performance.

Findings

An Garda Síochána has developed several processes to ensure closer monitoring of FCPNs. As only five members – all senior leaders in the Garda National Roads Policing Bureau – can authorise their cancellation, the review was assured that there is a high level of consistency and a low risk of misconduct. There is also a high level of internal monitoring and external oversight through regular audits completed by a judge.

Limitations still exist about the application of protocols assessing the validity of members breaching road traffic laws. To strengthen this process, An Garda Síochána proposed modifications to the current monitoring form, which would require a high level of detail and a clear rationale from members seeking FCPN exemptions. By implementing these modifications, it was believed that the exceptional circumstances test would be incorporated into ongoing regular processes. In addition, all contextual information relevant to each breach under review, including risk, mitigating factors and evidence would be provided and considered in each case.

Consultation on these changes was met with the challenge that modifying the current form to incorporate greater detail and a clear rationale from members seeking an exemption was not compliant with current legislation. In the absence of an agreement with the staff associations to introduce these adjustments, An Garda Síochána reverted to the original form. Consequently, a change in legislation affecting all emergency services is necessary to mandate the provision of information and to focus on the circumstances in which a breach qualifies for an exemption. Until this is rectified it is not possible for the organisation to ensure that the application of 'the exceptional circumstances' test is incorporated into regular practice.

Assessment: Partially Implemented

Legislative change is still required to ensure that the application of 'the exceptional circumstances' test is incorporated into regular practice.



Recommendation 22

An Garda Síochána was required to develop, publish and implement policy and guidance on charging for non-public duty to minimise the opportunity for inconsistency and maximise transparency for garda managers and event organisers. To support this, it was recommended that the Executive Director Finance and Services have responsibility for ensuring a consistent approach to the charging and recovery of non-public duty costs. All non-public duty policing plans were also to be approved at a regional level by the Regional Assistant Commissioner.

Findings

Non-public duty is performed by members of An Garda Síochána under arrangements made with organisers of events who seek to engage policing services to support such events. These events can include sports matches, concerts and race meetings. An Garda Síochána conduct an assessment as to whether to charge for the support requested, to charge for part of the support or to not levy a charge at all. This non-public duty is guided through the *Provision of Garda Services for Certain Events and Associated Charges Policy and Procedures*.

The assessment was conducted by completing a scoring matrix which calculated whether all, a part of or none of the charge should be applied. The review found that completion of the matrix was open to interpretation, with one division indicating that they did not abate but applied the full charge if policing services were required for non-public events. Their database corroborated this approach. This review found that, while not recorded on the database, negotiations to enable abatements occurred in advance of the assessment process. There was a strong level of confidence within the office of the Director of Finance that all records are being completed and shared for filing within the finance office.

There was a good but not complete level of consistency in decision-making in relation to waiver or abatement of charges for non-public duty within divisions. This risks a perception of favouritism in the process of levying costs for non-public duty performed by gardaí. It also presents a risk of An Garda Síochána not knowing exactly what they should be charging for, how much and what money should be recovered to the public purse from events, many of which are designed to return significant profits. This openness to interpretation brings inconsistency, which can only be remedied if a centralised approach is adopted. Accordingly, consideration should be given to centralising responsibility for completing charging for services assessments in either the existing Major Emergency Management Team or within a new central event planning office created to undertake this function and to support regions and divisions in planning for major or national events.

In the context of the original 2020 report, this recommendation has been implemented, as a new policy was approved and implemented in 2023. However, a Comptroller and Auditor General (C&AG) report on the Accounts of the Public Services 2023⁶ contains the results of a review into the Cost of Policing Non-Public Duty Events, including this new policy. The C&AG report has identified further action required through four new recommendations. This includes a review and revision of the policy. While it is understood that the policy has been revised to include consideration of the recommendations of the C&AG report, this has not yet been provided to the Authority.

6. [Report on the Accounts of the Public Services 2023 - Office of the Comptroller and Auditor General](#)

Assessment: Implemented

This recommendation while technically implemented by the publication of policy in 2023, does not achieve the intended outcome of the recommendation. While the updated draft policy has not yet been provided, if it addresses the four C&AG recommendations, this will significantly contribute towards achieving the intended outcome of this recommendation.

4.4 Chapter 4 – Identifying and Investigating Corruption

All police services must do more than simply react to corruption as it occurs. Police services must take a proactive and holistic approach to protecting the organisation against the threat of corruption and minimising its impact. The early identification and thorough investigation of corruption requires strong leadership, effective processes and sufficient dedicated resources to intervene expeditiously, while limiting the potential for further harm.



Recommendation 23

An Garda Síochána should assign overall organisational responsibility for the prevention, detection and investigation of corruption within the Garda Anti-Corruption Unit (GACU). To support this responsibility, the Anti-Corruption Unit should have full visibility of all ongoing criminal and disciplinary investigations into members of the garda workforce.

Findings

GACU investigate corruption and Internal Affairs is responsible for the administration of all discipline investigations. The significant amount of work completed by GACU and Internal Affairs in preparation for commencement of the Act on 2 April 2025 must be commended. Simultaneous to commencement of the Act, the conduct, standards and performance regulations⁷ were also commenced. To facilitate the completion of existing disciplinary investigations initiated in advance of the commencement of the Act, the Garda Síochána (Discipline) Regulations 2007 continue in force, in accordance with Section 261 of the Act.

This has resulted in a complex environment within which GACU and Internal Affairs are working with a dual process of old and new regulations. The review team discussed with GACU and Internal Affairs the cluttered regulatory landscape and were reassured by the efforts of An Garda Síochána in managing the dual discipline processes. Despite their commitment to managing the dual discipline processes, both units remain under-resourced in a few key areas such as human resources and IT.

While the good working relationship enables open communication and interaction, one does not have sight of the other's work on a live-time basis. The requirement for GACU to have full visibility of all ongoing criminal and discipline investigations is dependent on the provision of a new integrated case management system. The review team was advised that development of this is underway. This IT support should be expedited.

7. Policing, Security and Community Safety Act 2024 (Section 257) (Conduct) Regulations 2025, the Policing, Security and Community Safety Act 2024 (Standards of Professional Behaviour) Regulations 2025 and the Policing, Security and Community Safety Act 2024 (Section 256) (Performance) Regulations 2025.

This integrated case management system will not be utilised to share intelligence. GACU and Internal Affairs currently rely on intelligence being processed to these units from the Garda National Crime, Security and Intelligence Service (GNCSIS). While this is currently reported as working effectively, the process would be enhanced through the introduction of a single intelligence IT system with tiered access. This is reported as being under development and should be prioritised as a critical IT system.

Assessment: Partially Implemented

GACU retain organisational responsibility for the prevention, detection and investigation of corruption. In order to fulfil this responsibility GACU need full visibility of all ongoing criminal and discipline investigations involving garda personnel. To complete the implementation process requires the introduction of an integrated case management system.



Recommendation 24

An Garda Síochána should develop formal arrangements for the mutual sharing of intelligence between the Garda Síochána Ombudsman Commission, law enforcement agencies and the Anti-Corruption Unit.

Findings

A draft Memorandum of Understanding (MOU) was shared by An Garda Síochána with GSOC in December 2024. Following commencement of the PSCS Act in April 2025, work is progressing to reach agreement with Fiosrú on the content. This work is not yet complete. The Policing, Security and Community Safety Act 2024 was commenced on 2 April 2025 and sets out the requirements between An Garda Síochána and Fiosrú. This review has established that work is rapidly progressing to develop a MOU between both organisations. This will seek to enable and empower fluid and appropriate information sharing.

Assessment: Not Implemented

An Garda Síochána to continue engaging with Fiosrú on arrangements for the mutual sharing of information about countering the threat of corruption. Recommendation will be considered implemented upon finalisation of the MOU.



Recommendation 25

An Garda Síochána should provide sufficient resources to the Anti-Corruption Unit to create a dedicated intelligence team with responsibility for developing a strategic and tactical understanding of corruption threats within An Garda Síochána. This should include tasking and coordinating the collection of all anti-corruption intelligence and assessing, monitoring and managing all reports of internal corruption. The maintenance of a standalone intelligence database and case management system to record such information and decisions is vital for disseminating credible leads for investigation or intervention.

Findings

An intelligence function has been introduced and resourced. However, it relies on GNCSIS sharing all relevant information. While there are currently no concerns in respect of this, this work would be enhanced through the introduction of an integrated case management system and a single intelligence IT system with tiered access. Neither of these IT packages are in place, although the work to deliver the case management system was reported to be progressing well.

Assessment: Partially Implemented

There has been a consistent resource profile within GACU since its inception. This has enabled the establishment of an intelligence function. An Garda Síochána should keep resourcing levels of this function under review to ensure there is sufficient capacity to meet future demand. The requirement for a dedicated anti-corruption integrated case management system remains a barrier to implementation.



Recommendation 26

An Garda Síochána should provide sufficient resources to the Anti-Corruption Unit to reflect the current assessment of risk and to ensure that the unit can conduct independent discipline and criminal investigations. Those engaged in counter-corruption investigations should be experienced detectives and have specific counter-corruption training.

Findings

This recommendation is implemented and achieving the intended outcome. However, this review considers that the resources and resilience of the unit must be kept under review to ensure sustainability to meet future demand. This includes the ability to conduct investigations expeditiously to meet the requirements under Article 6 of the European Convention on Human Rights in relation to the right to a fair trial. Evidence exists of investigations having to be prioritised and delayed due to limited resources. This is not unusual in law enforcement organisations where constant risk-assessed prioritisation of investigations is required.

The survey asked respondents to indicate how confident they are in their organisation's ability to detect, investigate and appropriately manage incidents of wrongdoing. The percentage of garda trainee respondents who were either 'confident' or 'very confident' in An Garda

Síochána's ability to investigate and manage wrongdoing was 87 per cent for Group A and this remained consistent for the other trainee garda respondents in Group B. However, the level of confidence dropped to 53 per cent for the experienced operational personnel in Group C. This data is shown in Figure 9 and highlights that respondents with longer service are less confident in the organisations ability to investigate wrongdoing.

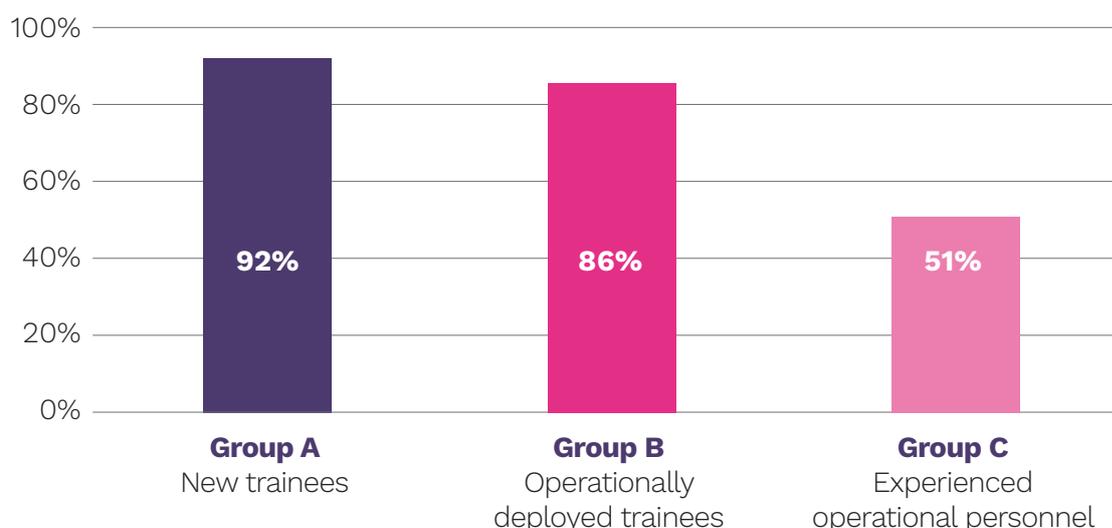
Figure 9: Percentage of survey participants having confidence in An Garda Síochána's ability to detect, investigate and appropriately manage incidents of wrongdoing

Confidence in investigation of wrongdoing	Very Confident	Confident	Doubtful	Very Doubtful
Group A – New trainees	23%	64%	12%	1%
Group B – Operationally deployed trainees	11%	75%	14%	0%
Group C – Experienced operational personnel	10%	43%	30%	17%
Overall	15%	57%	20%	8%

Source: Policing and Community Safety Authority Survey

All three groups were asked about their level of confidence that a report would be handled professionally, confidentially and with diligence by the organisation if they spoke up and reported wrongdoing. The confidence expressed by the experienced operational personnel in Group C (51%) was less than that the confidence expressed by the trainee gardaí in both Groups A and B (86% and 92%). See Figure 10 for the results.

Figure 10: Percentage of respondents who were confident that a report would be handled professionally, confidentially and with diligence



Source: Policing and Community Safety Authority Survey

 **Assessment: Implemented**



Recommendation 27

The Department of Justice should implement the necessary statutory framework, in line with the State's obligations under the European Convention on Human Rights relating to effective independent investigation, to ensure that all instances of conduct linked to sexual violence or abuse of power for sexual gain arising from the actions of a member of the garda workforce acting in their professional capacity which could result in a breach of an individual's rights under Article 2 or 3 of the Convention are referred for independent investigation.

Findings

Section 203 of the Act provides for an extended definition of serious harm, which compels the Commissioner to refer to the Fiosrú any matter that appears to indicate that the act or omission of a member of garda personnel may have resulted in the death of, or serious harm to, a person. Serious harm is clearly outlined in Section 193 of the Act and explicitly references both sexual offences and the abuse of power for sexual gain.

✓ **Assessment: Implemented**



Recommendation 28

An Garda Síochána should ensure that the Anti-Corruption Unit develop and implement an external and internal communications strategy on abuse of power for sexual gain to raise awareness and encourage reporting of suspicious behaviour.

Findings

A communications strategy was developed and implemented. The Professional Boundaries and Abuse of Power for Sexual Gain Policy and related procedures have been reviewed and updated on three occasions since implementation. This review found extensive communication through a variety of media and has been used to ensure awareness across the organisation. Most recently, this is a theme in the GACU briefings for all staff.

✓ **Assessment: Implemented**



Recommendation 29

An Garda Síochána should develop, publish and implement a strategy to encourage the reporting of wrongdoing. This includes using and promoting:

- Protected Disclosures.
- The Integrity at Work Programme.
- Confidential lines and systems for anonymous reporting.

Findings

A strategy has been developed and implemented. Prior to this, in 2017, An Garda Síochána had signed and committed to an Integrity at Work pledge with Transparency International Ireland. This is one of several avenues publicised to members and staff as available for reporting wrongdoing. The policy was reviewed as required and communicated across the

organisation. A total of 58 per cent of all respondents to the survey indicated that they knew the difference between a grievance and a protected disclosure and how to make one or find information on how to do it. The analysis of responses to the survey identified that 96 per cent of all respondents would report wrongdoing if they became aware of it. However, there is a clear difference between the trainee gardaí in Groups A and B when compared with the experienced operational personnel in Group C.

Furthermore, most respondents recorded that any report they would make would most likely be to their supervisor, which highlights the importance of the role of the supervisor and supervision within the organisation. Figure 11 shows the responses from the three separate survey groups.

Figure 11: Percentage of survey participants who would report wrongdoing

Reporting wrongdoing concerns	I would report
Group A – New trainees	98%
Group B – Operationally deployed trainees	100%
Group C – Experienced operational personnel	92%
Overall	96%

Source: Policing and Community Safety Authority Survey

 **Assessment: Implemented**



Recommendation 30

An Garda Síochána should ensure that the Anti-Corruption Unit has visibility of all reports of wrongdoing, including garda-managed protected disclosures to ensure a holistic understanding of the risk within the organisation.

Findings

GPSU manage Protected Disclosures effectively, but legislation prevents information-sharing in respect of this confidential topic. The Assistant Commissioner with responsibility for Governance and Accountability has visibility of all types of wrongdoing, including reports made through Protected Disclosures. Through this office, GACU, Internal Affairs and Professional Standards are appropriately kept updated on any information relevant to their area of business. The review did not identify anything to suggest the contrary.

 **Assessment: Implemented**



Recommendation 31

An Garda Síochána should assign responsibility to the Anti-Corruption Unit for monitoring all counter-corruption polices and registers, including those containing ethical declarations. This should include:

- Gifts, hospitality and sponsorship.
- Notifiable associations.
- Conflicts of interest.
- Business interests and secondary employment.
- Ethics in public office.
- Post-employment activity.

Findings

The review found a number of policies which have been put in place or assigned to GACU. However, some policies are still under development within GACU and remain incomplete. The status of the policy and assigned responsibility is shown in Figure 12.

Figure 12: Status of Each Policy

Policy	Policy in place	Responsibility assigned to GACU
Gifts, Hospitality and Sponsorship	Yes	No
Notifiable Associations	No	Yes
Conflicts of Interest	No	Yes
Business Interests and Secondary Employment	No	Yes
Ethics in Public Office	Yes	Yes
Post-Employment Activity	No	No

Source: Policing and Community Safety Authority

These policies need to be progressed and implemented to achieve the strategic outcomes identified in the GSI report. GACU will be required to implement monitoring mechanisms as policies are introduced and assigned to them.

Assessment: Not Implemented

At the time of this review, not all policies have been implemented or allocated to GACU yet.

4.5 Chapter 5 – Reducing the Impact of Corruption

The police response to external corruption threats must consider that those who seek to exploit organisational vulnerabilities will utilise new technologies and adapt to emerging opportunities. This means that An Garda Síochána must tackle the external or personal factors for existing staff such as debt, substance addiction or inappropriate associations, or internal factors such as weak supervision or a permissive culture, leaving its personnel susceptible to corruption.



Recommendation 32

An Garda Síochána should develop, publish and implement a structured early intervention and support programme with the objective of identifying and supporting members of the workforce who may be vulnerable to corruption.

Findings

A working group is reported as being convened to progress this recommendation. The briefings delivered across the service by the GACU Integrity Team are designed to encourage the workforce to speak up and feel supported. However, the survey conducted as part of the review asked respondents, *'If I felt personally vulnerable to corruption or wrongdoing, I would consider my organisation to be a good place to receive support'*.

While 88 per cent of trainee gardaí in Groups A and B responded positively, this dropped to 54 per cent for the experienced operational personnel in Group C.

Good practice was found across divisions in relation to practical interventions. These usually involved supervisors speaking privately to a person and encouraging that person to accept support to resolve a problem. This structure is informal and dependant on individual leadership style.

The survey asked participants to identify the risks that could make them vulnerable to corruption. Collectively, 95 per cent of respondents agreed that they were aware of at least one or more of the risks that would make them vulnerable to corruption. The most common responses provided are shown in Figure 13.



Recommendation 34

An Garda Síochána should implement a counter-corruption communications strategy, which would include the findings of internal disciplinary hearings, lessons learned and suitable real-life case studies as the basis of future training and briefing packages.

Organisational learning drawn from international trends and internally-focused investigations, including those conducted by the Garda Síochána Ombudsman Commission and other regulatory bodies should be disseminated.

Findings

Significant effort has been made to communicate learning from cases investigated by the GACU. In addition to the briefings and case studies detailed in Recommendation 33, GACU also meet with assigned ACU Liaison Officers (PAFA superintendents) on a regular basis to ensure continued communication. The chief superintendent and PAF team in all divisions visited reflected an ease and fluency of access to and contact with GACU, Internal Affairs and GPSU.

The review found examples of good work initiated by PAF teams to ensure policy compliance in areas highlighted in the 2020 report, such as discontinued cases. While GPSU publish an annual business plan, the PAFA superintendents focus their inspection and review work on areas of service delivery identified within divisions as emerging risks. There is some commonality in the work undertaken by GPSU and PAF teams, although GPSU will share their findings, whereas there is no mechanism for PAF teams to share good practice with their peers across other divisions. Accordingly, there is merit in strategically aligning the role and work of GPSU and that of the PAFA superintendents with a focus on enhancing a mutual focus on performance, audit, review and service delivery. Accordingly, this review recommends that this process should involve GPSU acting to choreograph the audit and assurance work by PAF teams alongside the GPSU business plan and facilitating regular PAFA superintendent seminars to promote the sharing of information and good practice.

Cases of corruption and wrongdoing are reviewed by GACU and Internal Affairs and numerous cases have been summarised and circulated across the organisation by way of 'lessons learned' newsletters. An average of 90 per cent of the trainee gardaí in Groups A and B agreed that key messages relating to preventing or reporting wrongdoing had been communicated effectively. This dropped to 60 per cent for the experienced operational personnel in Group C who responded. The results from this question are shown in Figure 14.

Figure 14: Percentage of survey respondents who believe key messages are communicated effectively

Effective Communication on Anti-corruption	Strongly Agree	Agree	Disagree	Strongly disagree
Group A – New trainees	28%	63%	8%	1%
Group B – Operationally deployed trainees	26%	63%	11%	0%
Group C – Experienced operational personnel	11%	49%	29%	11%
Overall	20%	57%	18%	5%

Source: Policing and Community Safety Authority Survey

 **Assessment: Implemented**

However, there is merit in GPSU coordinating the annual schedule inspection and review to be conducted by them and PAFA superintendents across all divisions, as well as facilitating regular knowledge- sharing events to promote the sharing of information and good practice.



Appendix A – Terms of Reference

Terms of Reference

Post Implementation Review of the Garda Síochána Inspectorate *Countering the Threat of Internal Corruption Report*

In accordance with Section 117(2) (a) of the Garda Síochána Act 2005, as amended, the Garda Síochána Inspectorate considers it appropriate to carry out a post-implementation review of the *Countering the Threat of Internal Corruption Report 2020*.

The aim is to:

- Review recommendations 3, 4, 7, 11, 25, 28 and 30 which have been identified by the Garda Síochána as implemented and assess whether they are achieving their intended outcome; and
- Assess the extent to which the remaining recommendations have been progressed.

In line with the Inspectorate's obligations under Section 42 of the Irish Human Rights and Equality Commission Act 2014, this review will assess the Garda Síochána's performance in fulfilling its Public Sector Equality and Human Rights Duty.



Appendix B – Summary of Survey

Consolidated Summary Responses to Survey July–August 2025

- **Group A:** New recruits in their initial weeks at the Garda College.
- **Group B:** Trainees who are part-way through their training and have completed their operational deployment in divisions.
- **Group C:** Experienced operational personnel in divisions and in Organised and Serious Crime (OSC).

Approximately 3,000 members work in the four divisions and the OSC bureau, of whom 160 completed our survey (5.3%). A total of 202 trainee gardaí at the Garda College completed the survey, representing over 50 per cent of their respective class cohorts.

Questions were prefaced with the statement:



‘all answers are anonymous and we have no way of identifying any of you and ask that you also consider this when submitting your answers. We can only gain a thorough understanding with your honest input, so thank you in advance for your participation.’

Question 1

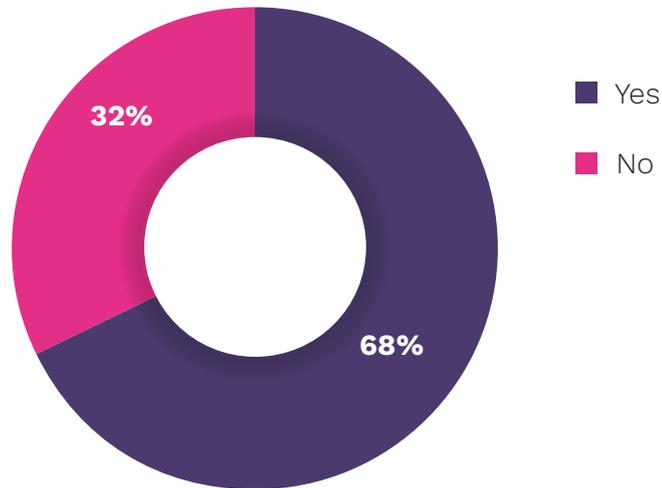
I have worked for An Garda Síochána for:

	Group A	Group B	Group C	Overall
Less than 5 years	100%	99%	15%	62%
5–10 Years	0%	1%	20%	9%
10–20 Years	0%	0%	24%	11%
More than 20 Years	0%	0%	41%	18%
Number	126	76	160	362

Question 2

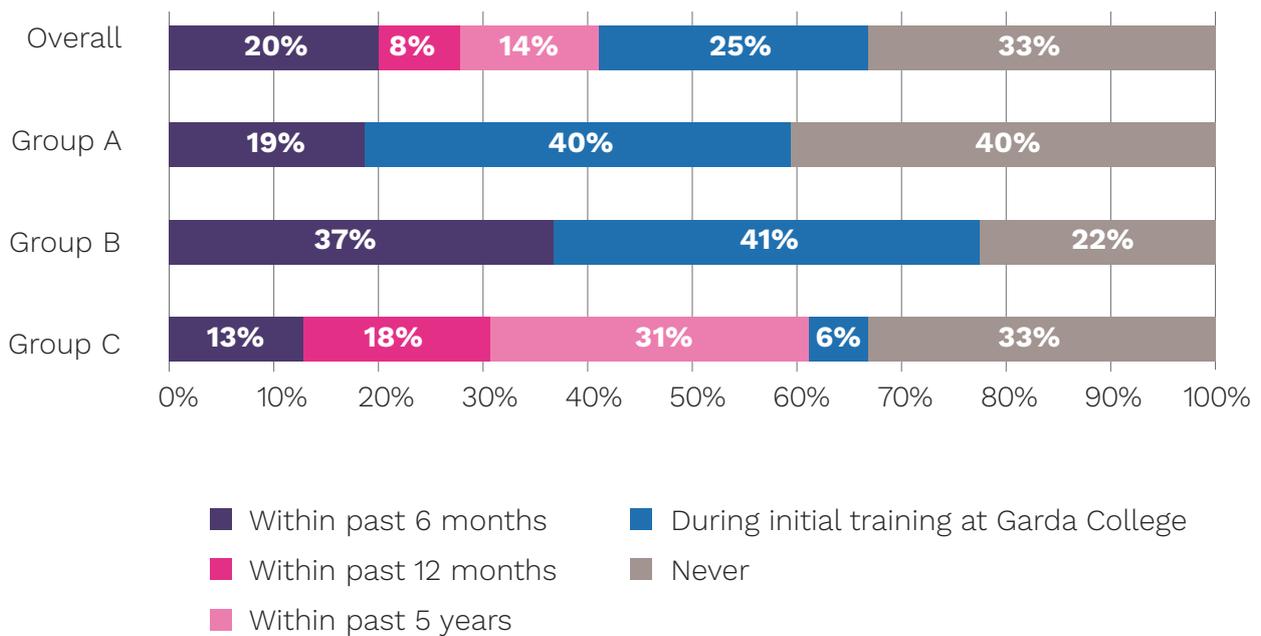
I have completed the GETS¹ training module on anti-corruption:

¹ GETS: Garda Education and Training System



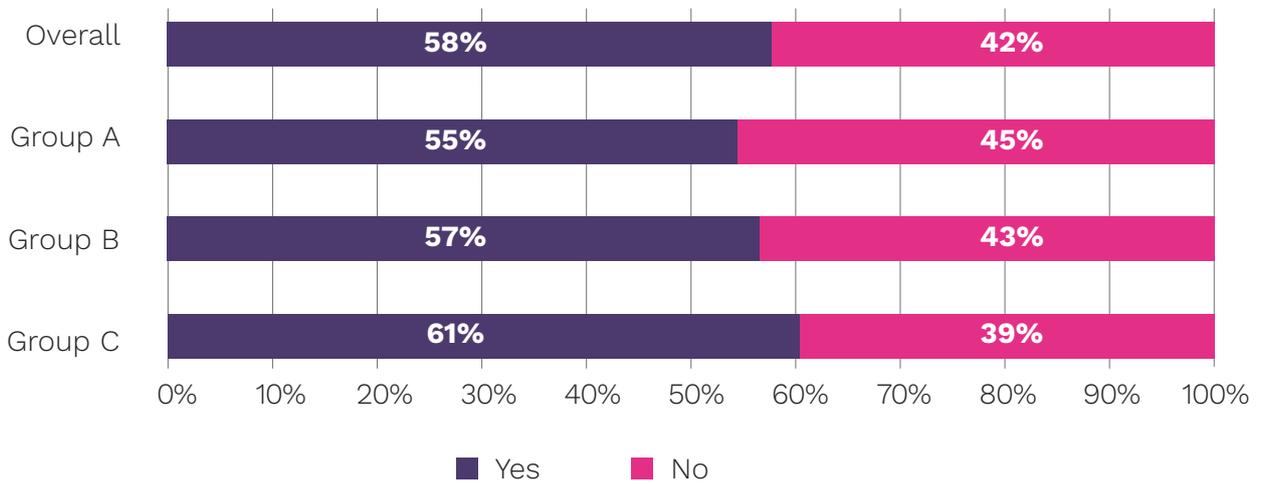
Question 3

I have received training and/or additional information from AGS on corruption:



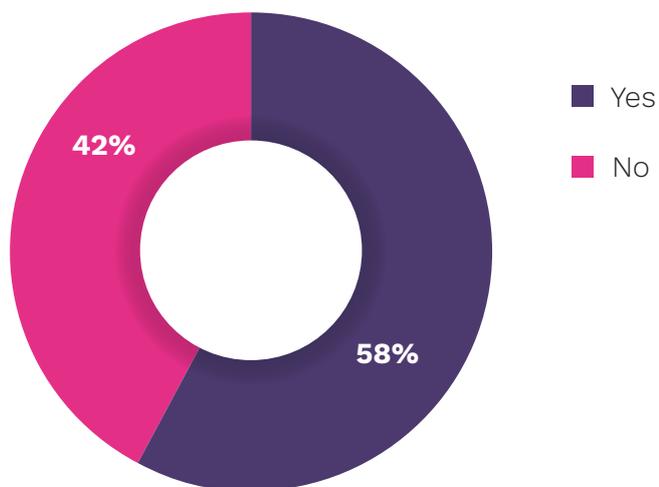
Question 4

I have a clear understanding of the difference between what constitutes a grievance and what a protected disclosure is:



Question 5

I know how to make a protected disclosure, or I am confident that I could easily find information on how to make one:



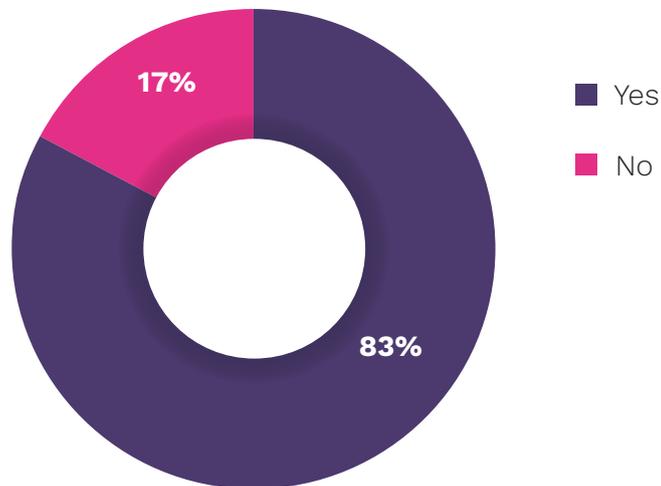
Question 6

I would only report wrongdoing or make a protected disclosure anonymously:

	Group A	Group B	Group C	Overall
Yes	42%	47%	48%	46%
No, I would be comfortable making a report even if not guaranteed anonymity	55%	50%	44%	49%
No, I would not make a report under any circumstances	3%	3%	8%	5%
Number	126	76	160	362

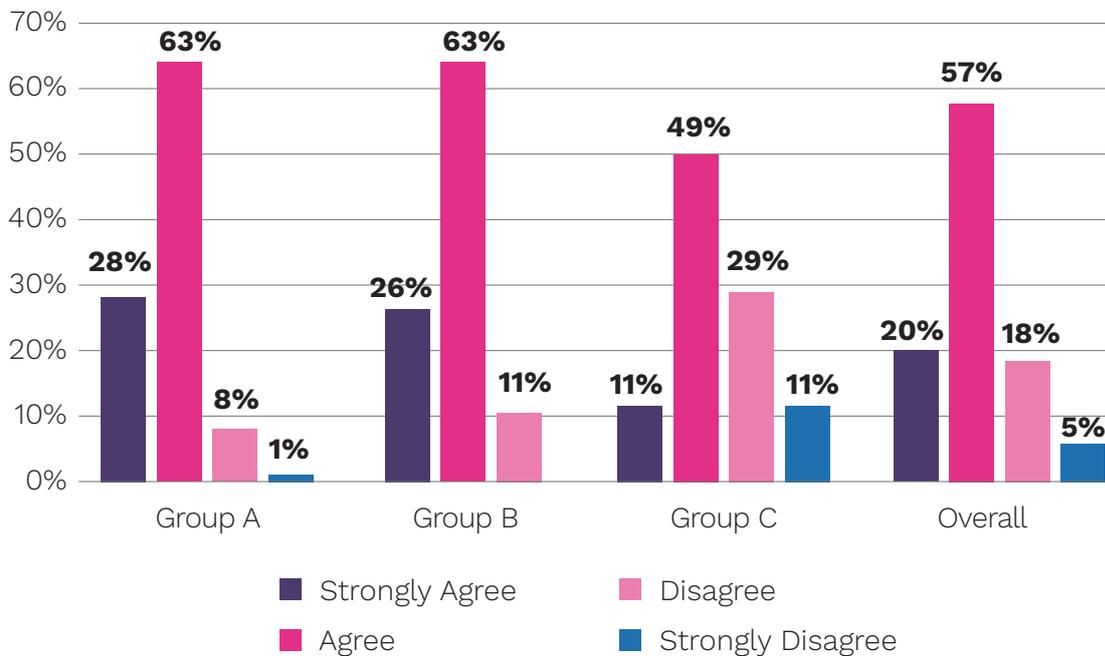
Question 7

Should An Garda Síochána introduce in-career vetting for Members and Staff?



Question 10

I know that if I spoke up and reported wrongdoing it would be handled professionally, confidentially and with diligence by the organisation:



Question 11

I would be prepared to speak up and report wrongdoing committed by:

Tick all that apply	Group A	Group B	Group C	Overall
My office/team/unit colleagues	80%	91%	73%	79%
Other members and staff	74%	78%	69%	72%
Senior management	64%	63%	62%	63%
My supervisor	63%	68%	65%	65%
None of the above	2%	1%	7%	4%
I would not be prepared to speak up and report wrongdoing	5%	3%	14%	8%
Number	126	76	160	362

- 31 of 362 (8 per cent) of individuals would not report wrongdoing;
- 90 (25 per cent) of respondents would report on all categories listed;

- 20 (5 per cent) of those surveyed would report on colleagues, but not on superiors

Question 12

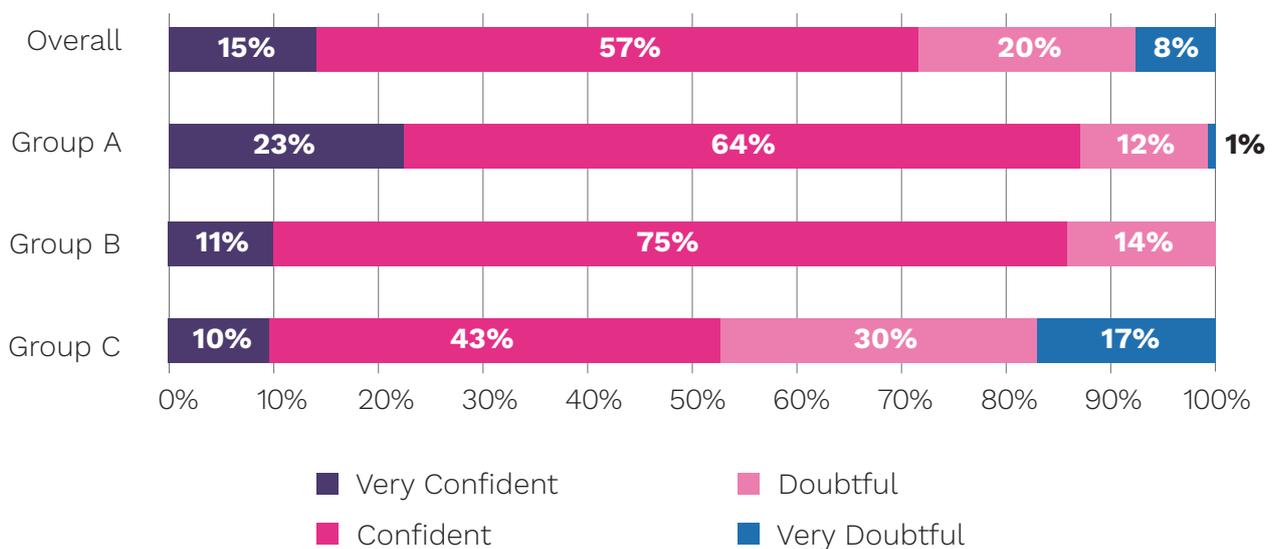
Please give reasons for your answer:

Responses from trainees demonstrate a clear awareness of the ethical responsibilities of members to uphold the law, and a majority of responses from experienced members include a principled objection to wrongdoing or corruption. However, an awareness was evident that reporting wrongdoing could have impacts on the reporter's future career progression. Strong trust is evident within the trainee cohorts in their direct supervisors. A theme emerging, particularly in Group C, is a lack of awareness of and trust in internal confidential and/or anonymous channels to report wrongdoing, making it easier to ignore minor issues or attempt to resolve them within the unit, rather than to make an official report.

All three groups described a fear of retaliation, which results in a cultural tolerance of some level of wrongdoing. A clear theme throughout the responses is an awareness of the negative outcomes for personnel or whistleblowers who have reported in the past.

Question 13

How confident are you in your organisation's ability to detect, investigate and appropriately manage incidents of wrongdoing?



Question 14

Please give reasons for your answer:

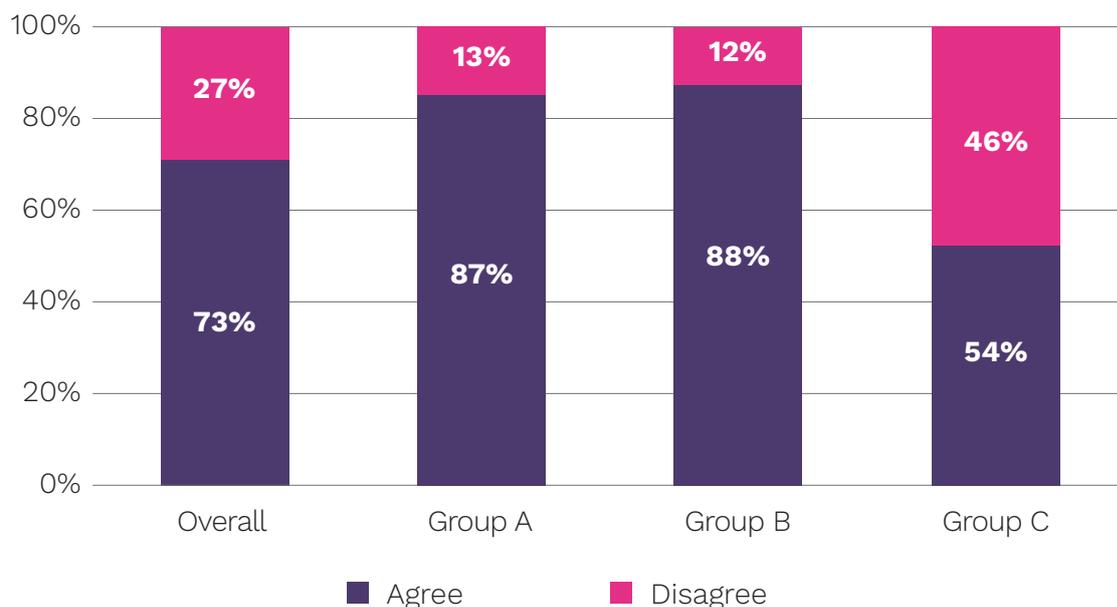
Responses fell clearly into two groups – those who have confidence in the organisation's response to corruption and those who do not. Reference to the experience of well publicised whistleblowers in the past and to perceived cover-ups contrast strongly with others who expressed confidence that any criminality will be addressed ruthlessly or perhaps over-zealously by the organisation. The majority of new recruits (Group A) showed awareness

of the presence of wider corruption issues; trainees (Group B) note open secrets and tolerance of certain behaviours and/or some individuals; the majority of experienced operational personnel (Group C) are aware of inconsistent behaviour and are principled in their opposition to that, but fear retaliation.

Numerous named examples and personal anecdotes were provided that question previous treatment or inconsistent management of previous reports of wrongdoing. Multiple references to transfers/reassignment or promotion of those deemed problematic by managers were made. Many respondents distrusted the handling of internal investigations and criticised the quality of investigations. Criticism was expressed of the length of suspensions and the disproportionality between the impact of punishment on Members and the impact of wrongdoing. Some examples were also given of wrongdoing being appropriately handled, which was said to provide reassurance and breed confidence in the structures in place.

Question 15

If I felt personally vulnerable to corruption or wrongdoing, I would consider my organisation to be a good place to receive support:



Question 16

If I felt personally vulnerable to corruption or wrongdoing, I would seek support within my organisation from:

Tick all that apply	Group A	Group B	Group C	Overall
Colleagues	73%	66%	39%	57%
Supervisor	64%	62%	46%	56%
Senior Management	52%	32%	23%	35%
Employee Assistance Programme	49%	47%	34%	42%
None of the above, I would not seek support internally	3%	4%	20%	11%
Other (please specify)	4%	5%	11%	7%
Number	126	76	160	362

Note: Employee Assistance Programme is considered external (a Civil Service Programme available to garda Members and staff).

Most respondents ticked more than one answer; for example, 24 per cent would report to colleagues and/or supervisor and 3 per cent would report to senior management but not to their colleagues and/or supervisor.

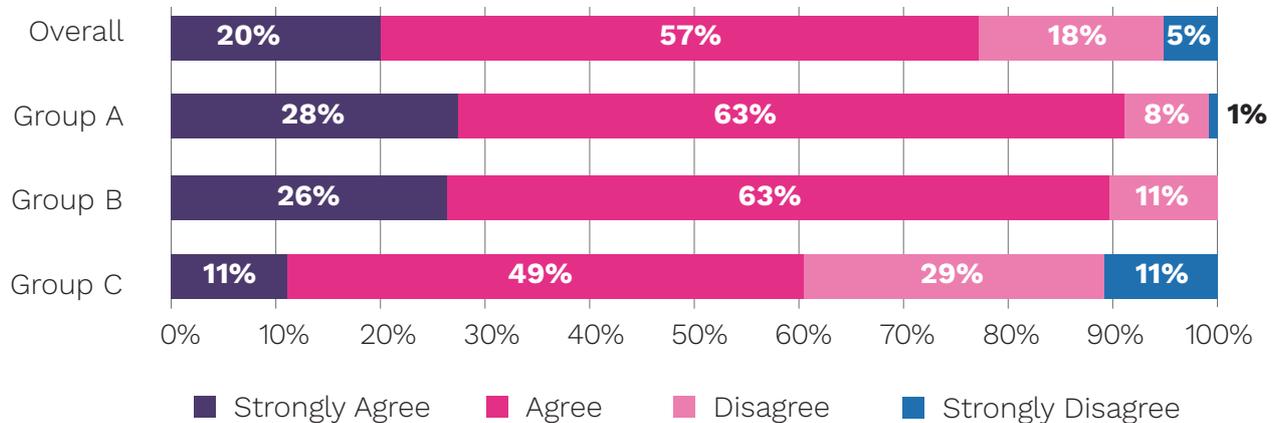
Question 17

If you would not seek support or selected 'other', please give a brief explanation for your answer:

A total of 59 respondents (22%) provided additional information in response to this question, indicating that they would not seek support internally if they felt vulnerable to corruption. Among the responses a clear theme emerging in Group C was the propensity towards gossip within the organisation and a lack of confidentiality, resulting in a lack of trust in official channels and processes. In all groups there is an awareness that a prevailing culture of loyalty above honesty is unhealthy. Some respondents identified alternative channels, for example their representative association or union, family and friends or private therapy. However, most of these responses considered the risk of potential stigma, impact on personal reputation or career progression above the risks associated with vulnerability to corruption.

Question 20

An Garda Síochána communicates key messages relating to preventing and reporting wrongdoing across the organisation effectively:



Question 21

Can you provide an example of an incident of wrongdoing being detected and the 'Lessons Learned' communicated by An Garda Síochána?

The majority of responses to this question were 'no', but a number of previous examples were highlighted, with one case in particular being referenced by a majority of trainees. There were 112/260 responses given (43%) that were not null/no or blank. Numerous mentions of protected disclosures and cases involving former Members, including a whistleblower, a previous Commissioner, a garda convicted and sentenced for domestic abuse-related offending, an incident involving a bike during Covid, inappropriate removal of items from evidence stores, inappropriate cancellation of 999 calls, squaring of traffic offences, sharing of information from PULSE, domestic violence orders, deaths in custody and false or coerced confessions.

The Word cloud captures the essence of the responses to Question 21, with larger words featuring more commonly in the responses than smaller words.



Question 24

What would you do in this situation?

A member has given their contact number to a victim of crime to provide information and support in relation to their case as needed. The member is familiar with the victim as they work in the local community, but they haven't had any formal contact before this case. A few months after the case is concluded, the victim contacts the member and appears eager to pursue a romantic relationship.

The most common response in this scenario was to speak informally to a supervisor and kindly advise the victim that a relationship should remain professional, with another member taking over as a point of contact if necessary. However, some responses debated the circumstances of the individual case, such as, vulnerability and length of time, arguing this is a personal matter and that many members have met partners through work and the organisation needs a balanced approach to such situations.

Question 25

What would you do in this situation?

You start to notice that your colleague often comes into work late looking unkempt. They often make references to having a 'late night' and other colleagues have commented on a smell of alcohol when in their presence. You have a friendship with this colleague, but you have noticed a deterioration in how this member engages in their duties.

The majority of respondents said they would approach the colleague to outline their concerns and offer support to them if there was a wellbeing issue. Many respondents who felt the behaviour was impacting work performance and service to the public said they would go to the colleague's supervisor with their concerns.

Question 26

What would you do in this situation?

You are suspicious that another member is lodging smaller amounts of items in the drug register and PEMS store than they had seized during a drugs search. You know this as you are friends with another member who works with them, and the amounts they have told you were seized are different to the quantities registered on the system.

Almost all respondents would report this matter immediately due to its criminal nature (rather than wrongdoing), and some would gather further evidence for this report.

Question 27

What would you do in this situation?

Your brother owns a towing company and has just received the local contract for towing Garda-seized vehicles, making him a Garda employee. You had no involvement in the awarding process, and have no role in tasking the company. Nobody in work knows that you are related, and on your birthday, your brother gives you a very generous gift of a voucher from a local hotel.

Respondents largely agreed that this gift is personal and therefore nothing to do with the work of AGS. Some discussed transparency, with a focus on either informing the organisation of the familial relationship or presuming such disclosure would be part of the tendering process.

Question 28

What would you do in this situation?

Your neighbour has been arrested for possession of child sexual abuse material. He is heavily involved in a number of community groups and none of them know about his recent arrest. You are concerned for the safety of your other neighbours and community members.

The responses focus on the ongoing nature of the investigation, citing confidentiality and the rights of the suspect to privacy and due process. However, they also discuss the internal channels available to ensure that the investigation is aware of the suspect's involvement with community groups so that appropriate referrals and protections can be put in place.

Question 29

What would you do in this situation?

You are on duty in the custody suites when your supervisor acts in a way that you feel is unprofessional. They are both verbally aggressive and agitating with one prisoner who is intoxicated. Your supervisor is ignoring basic requests from the prisoner and you are concerned for their welfare.

The majority of responses recommend taking charge of the situation as member/person in charge and asking the supervisor to leave, with due regard for prisoner welfare. Many responses considered reporting only if de-escalating or 'having a word' afterwards had no impact. However, a sizeable minority would immediately escalate the incident to a superior or report the supervisor for their unprofessional behaviour.



PCSA

Údarás Póilneachta
& Sábháilteachta Pobail
Policing & Community
Safety Authority