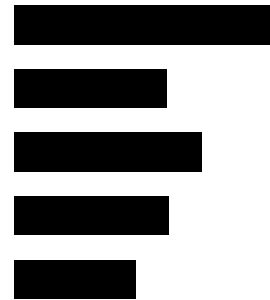


Ms. Claire Carroll  
Government Reform Unit  
Department of Public Expenditure and Reform  
Fourth Floor  
St Stephen's Green House  
Dublin 2

Mr. Karl Fitzpatrick



[ethics@per.gov.ie](mailto:ethics@per.gov.ie)

14<sup>th</sup> January 2022

Dear Ms. Carroll,

***Re: Public Consultation - Reform and Consolidation of Ireland's Statutory Framework for Ethics in Public Life***

- 1 Do you agree with the broad policy approach as a viable basis to guide legislative reform for the statutory framework for ethics? Yes
  
- 2 Placing certain basic principles on a statutory basis (i.e. concern for the public interest) are likely to form part of proposals. Do you agree with this approach? Yes.  
  
However, it must be ensured that the broad-based ethics terms are given objective definitions to ensure their clear meaning.  
  
For illustrative purposes, providing examples of breaches of these terms may also be useful.
  
- 3 What principles would you like to see in Ireland's statutory framework for ethics?  
  
Honesty, Integrity, Concern for the Public Interest, Respect for Others, Accountability, Objectivity.
  
- 4 In so far as the statutory framework for ethics may interact with personal rights (i.e. privacy by published registers of interests and the right to earn a livelihood by

restrictions post-term employment) – what sort of measures would represent a fair and appropriate balance between personal rights and the public interest?

5 What further suggestions for changes, if any, would you make?

- Introduce advice, guidance, support for complainants;
- Introduce improved protections for complainants;
- Implement enhanced communication protocols to keep complainants updated throughout the process
- Where contraventions are determined by the Commission, complainants' costs incurred in submitting their complaint should be reimbursed; and
- The Public Sector Standards Bill needs to be reinitiated into the first stage of the legislative process

Please explain the reason for your proposed change, and where possible, advance evidence or arguments in support. Evidence might be factual, legal or based on your experience

The aforementioned proposal changes have been influenced by my direct personal experience in submitting a complaint to SIPO which resulted in the Commission finding against the respondent in respect of all three alleged contraventions.

Yours Sincerely,

Karl Fitzpatrick