



UK Mission to the
United Nations
in Geneva

UK Mission Geneva
Avenue de la paix 5-7
1202 Genève
Switzerland

+41 79 865 57 68

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Geneva, 17 February 2026

The Permanent Mission of the United Kingdom of Great Britain and Northern Ireland presents its compliments to the Office of the United Nations High Commissioner for Human Rights and has the honour to submit its response to communication OL 18 2025 further to the letter dated 30 October 2025 from the Special from the Special Rapporteur on the promotion of truth, justice, reparation and guarantees of non-recurrence; the Special Rapporteur on extrajudicial, summary or arbitrary executions and the Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment.

The Permanent Mission of the United Kingdom of Great Britain and Northern Ireland avails itself of this opportunity to renew to the Office of the United Nations High Commissioner for Human Rights the assurances of its highest consideration.



Geneva, 17 February 2026

Special Procedures Branch
Office of the United Nations High Commissioner for Human Rights



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United Kingdom of Great Britain and Northern Ireland

Response to Special Procedure communication OL GBR 18/2025 from the Special Rapporteur on the promotion of truth, justice, reparation and guarantees of non-recurrence; the Special Rapporteur on extrajudicial, summary or arbitrary executions and the Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment

The UK Government is grateful for the Special Rapporteurs' ongoing scrutiny and interest in matters pertaining to the legacy of the Troubles in Northern Ireland.

Please see below the UK Government's substantive responses to the questions raised.

1. Please provide any additional information and/or comment(s) you may have on the above-mentioned analysis.

The UK Government is grateful for the Special Rapporteur's analysis that the Joint Framework is a "significant improvement over the Legacy and Reconciliation Act 2023 and provides a blueprint for much needed progress in the quest for truth, justice and sustainable reconciliation for the harm endured during the Troubles". On 14 October 2025, the UK Government introduced the Northern Ireland Troubles Bill, which seeks to deliver on the UK Government's commitment to repeal and replace the Northern Ireland Troubles (Legacy and Reconciliation) Act 2023 through the faithful implementation of the measures articulated in the Joint Framework. The response to Question 2, below, provides a summary of the measures contained in the Northern Ireland Troubles Bill and the draft Remedial Order pursuant to paragraph 3(2) of Schedule 2 to the Human Rights Act 1998. The remainder of the response to this question responds to particular issues that are not raised in subsequent questions.

In relation to the Legacy Commission's period of operation, the Troubles Bill makes clear that there will be a new period of five years in which cases can be referred to the Legacy Commission. This does not mean that the Commission will have five years to 'address all potential cases'. The Commission will be able to continue to exercise its investigative functions after the five-year period, and the Secretary of State's power to wind up the Legacy Commission under Clause 25 of the Bill is subject to significant safeguards. The Secretary of State can only do so, by regulations, when they are satisfied that the need for the exercise of the Legacy Commission functions (including those conferred on Directors of Investigations and judicial panel members) has ceased.

The Secretary of State must consult the Legacy Commission and take into account its annual reports before taking a decision. The Secretary of State must also consult any other person



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that they consider appropriate. A report must be published by the Secretary of State setting out who has been consulted, a summary of the views expressed, and explaining why they are satisfied that the need for the exercise of the Legacy Commission functions has ceased. Finally, any decision to wind up the Legacy Commission will be subject to a vote in Parliament, via affirmative procedure.

On appointments to the Legacy Commission, the Troubles Bill, at Clause 9, requires the Secretary of State to publish a list of prospective consultees before they are consulted on relevant appointments. Where appropriate, for example for the Victims and Survivors Advisory Group (VSAG), this will of course include consultation with representatives of victims and survivors. The list of consultees will vary for each appointment process, to ensure that the consultation for each role includes the required expertise.

The public appointment of the Commissioners, Directors of Investigations, Judicial Panel Members, and members of the VSAG by the Secretary of State is consistent with the approach taken for many other public appointments, including in Northern Ireland. It is important that the Secretary of State has ultimate oversight of appointments, to ensure that all appointments are appropriate and capable of commanding public confidence.

On disclosure, national security is the first responsibility of the UK - and any - Government, and the Secretary of State is accountable to Parliament on matters of national security. Some information - even if historic - has present day implications for the life and safety of individuals, and national security.

The Troubles Bill puts in place a fairer disclosure regime, ensuring that the Legacy Commission has the powers it needs to find answers for families, and can make public the maximum possible amount of information, consistent with the State's responsibility to protect life and national security. That includes the introduction of a balancing exercise, akin to the UK Inquiries Act 2005, where the relevant Secretary of State is required to conduct when considering whether the public interest requires the disclosure of sensitive information.

Any decision to prohibit disclosure can, consistent with the approach taken in the UK Inquiries Act 2005, be subject to an appeal on judicial review principles. This is set out in Schedule 5 of the Troubles Bill. The primacy of the Executive in decisions relating to the security of the State is a principle long recognised by the UK judiciary, and is a crucial element of the State's ability to keep people safe. This is also currently subject to consideration by the UK Supreme Court in *In the matter of an application by Martina Dillon, John McEvoy, Brigid Hughes and Lynda McManus for Judicial Review (Dillon)*, with judgment awaited.

On the Independent Commission on Information Retrieval (ICIR), its establishment is subject to a treaty between the UK and Irish governments, and legislative provisions in both jurisdictions, which set out its functions. The treaty will be subject to amendments to reflect the changes to the original ICIR proposal in the Stormont House Agreement, as set out by the



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Joint Framework. This includes, for example, a move from three commissioners to two, both jointly appointed by the UK and Irish governments.

As part of the Joint Framework, the two governments agreed that a three year pilot phase was appropriate to properly test whether the ICIR is able to provide effective outcomes for families. This includes, for example, whether the ICIR is able to secure the participation of those who might hold the information that families seek. The pilot phase will consist of a one year preparatory period, and two years of operation.

The Troubles Bill sets out the sequencing of work between the Commission and the ICIR, providing families with choice whilst ensuring that legal proceedings are not prejudiced, and UKG is able to discharge its ECHR obligations. Specifically, Clause 75 prohibits the ICIR from accepting a request to pursue information in relation to a case if an investigation is required by the Legacy Commission for the purposes of ECHR compatibility, or if the Legacy Commission is already undertaking a criminal investigation in that case. Clause 78 also requires the Legacy Commission to notify the ICIR if it subsequently begins a criminal investigation into that case. In those circumstances, the ICIR must then cease any work in that case.

In relation to statements of acknowledgement, the UK Government agrees that unequivocal recognition and acknowledgement of past harm can be an important element in the facilitation of societal reconciliation. The Joint Framework commits the UK and Irish governments to taking the lead in considering such statements of acknowledgment, noting also the importance that such statements are forthcoming from others. The two governments discussed the matter at the previous British-Irish Intergovernmental Conference in November 2025, and will continue to carefully consider how this commitment can be best implemented, including in consultation with others.

The UK Government remains absolutely committed to the provisions contained in Part 4 of the Legacy Act regarding oral history, memorialisation, and academic themes and patterns, which are not being repealed.

2. Please indicate how the Joint Framework between the Government of the United Kingdom of Great Britain and Northern Ireland and the Government of Ireland on addressing the legacy of the Troubles complies with international norms and standards in the field of truth, justice, reparation, memorialisation and guarantees of non-recurrence for gross human rights violations such as summary executions and torture and ill-treatment, as described in this letter.

The Joint Framework is guided by the principles of the Stormont House Agreement (2014), which are also reflected in Clause 11 of the UK Government's Troubles Bill. The UK Government is absolutely committed to its human rights obligations, which it takes extremely seriously. The progress we have made in fulfilling our commitment to repeal and replace the



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Legacy Act, and to replace it with measures that are fully human rights compliant and can command public confidence, is a clear demonstration of this.

The Northern Ireland Troubles Bill and the draft Remedial Order pursuant to paragraph 3(2) of Schedule 2 to the Human Rights Act 1998 will collectively:

- Establish a reformed Legacy Commission, with statutory oversight arrangements to provide accountability and a statutory advisory group to ensure that the voices of victims and survivors, including those from a service background, are heard as part of the Commission's work;
- Provide strengthened governance, including two new co-directors of investigations, new statutory conflict of interest provisions, and appointments made to a new oversight board following advice from an independent appointments panel;
- Introduce enhanced investigative and fact-finding powers and a fairer disclosure regime, so ensuring that the Commission has all it needs to find answers for families, and the maximum possible information can be made public, subject to proportionate safeguards;
- Remove the immunity provisions from the previous government's Legacy Act 2023, which was almost universally opposed and found to be incompatible with the UK's human rights obligations.
- Establish an approach to inquests that fulfils the commitments the UK Government has made to restore those that were in progress and halted by the Legacy Act 2023, while recognising the primary role that the reformed Legacy Commission will play in providing answers for families, particularly in cases containing sensitive information. All other outstanding inquests will be referred to the Solicitor General to independently consider whether, in each case, they are most appropriately dealt with by the Legacy Commission or in the coronial system;
- Establish a new process (inquisitorial proceedings) within the Commission to be used for cases that transfer in from the coronial system. This will have provision for public hearings, the ability to consider sensitive information in closed hearings, and provide effective next of kin participation, including through legal representation;
- Establish an Independent Commission on Information Retrieval, jointly with the Irish Government, and consistent with the Stormont House Agreement. This will, initially on a pilot basis, provide families with an additional means to retrieve information.
- Remove the Legacy Act 2023's prohibition on civil proceedings, meaning that families will once again be able to seek civil remedies for past harms.



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The UK Government is confident that, once implemented, these provisions will establish a human rights compliant process for addressing Northern Ireland legacy issues that effectively investigates Troubles-related cases, securing information and acknowledgement for as many victims and families as possible, and is capable of pursuing prosecutions where sufficient evidence exists of criminal wrongdoing. Finally, the UK Government remains absolutely committed to the provisions contained in Part 4 of the Legacy Act regarding oral history, memorialisation, and academic themes and patterns, which are not being repealed.

3. Please indicate if effective consultation has taken place with all relevant stakeholders, including victims and civil society, concerning the aims and details of the Joint Framework and whether their views have been effectively taken into consideration. Please indicate what measures are envisaged to ensure victims' full and effective consultation and participation in this regard moving forward.

The UK Government has been informed and guided by the many stakeholders with whom it has conducted significant engagement since July 2024. This has included engagement with domestic political parties, victims and survivors' organisations, non-governmental and human rights organisations, those representing veterans and others who served the State in Northern Ireland, and representatives from civil society. The Government has listened closely, and the measures been brought forward, primarily via the Troubles Bill, seek to reflect what we have been told. However, given the range of perspectives held by so many people, it is always going to be impossible to deliver an approach that fully satisfies everybody.

The UK Government will continue to engage closely with all interested parties as the Troubles Bill continues its parliamentary passage. That engagement will take place in a spirit of openness, as the UK Government considers suggestions on how to further improve the current draft of the Bill that many have already recognised as a fundamental improvement on the flawed Legacy Act 2023.

4. Please indicate how the different aspects of the Joint Framework will be implemented, and which is the expected timeframe for this process to be completed. Please also inform how each incompatible provision in the Act will be repealed or amended in law (including the provisions related but not limited to the conditional immunity and the reformed ICRIR – now Legacy Commission), and;

5. Please provide copies of any available draft legislation and inform us about the expected timetable for their introduction and consideration before Parliament.

The UK Government introduced the Northern Ireland Troubles Bill on 14 October 2025. A draft of the Bill, as introduced, can be found [here](#). The Bill should be read alongside the Explanatory Notes, which can be found [here](#).



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The Bill includes provisions to fundamentally reform the Independent Commission for Reconciliation and Information Retrieval (to be renamed the Legacy Commission), to ensure that it is fully human rights compliant and is able to command greater public confidence. This includes new governance structures and independent oversight arrangements. The UK Government has published a European Convention on Human Rights Memorandum, which can be found [here](#). The Memorandum addresses issues arising under ECHR in relation to the Northern Ireland Troubles Bill, including provisions to address incompatibility findings made in relation to the Legacy Act 2023.

The Bill received its Second Reading in the House of Commons on 18 November 2025, and is currently awaiting its Committee Stage. A date is not yet scheduled. It is not possible to provide an expected timetable for the remainder of the Bill's legislative passage, as this is subject to many different factors. The UK Government is committed to making progress in as timely a manner as possible.

On 14 October 2025, the UK Government also presented a draft Remedial Order to the UK Parliament, pursuant to paragraph 3(2) of Schedule 2 to the Human Rights Act 1998. This included the UK Government's response to representations received on the original proposal for a draft Remedial Order laid on 4 December 2024. The draft Remedial Order seeks to remove all provisions of the Legacy Act 2023 relating to immunity and the prohibition on bringing Troubles-related civil proceedings. A draft of the Remedial Order can be found [here](#).

The Joint Framework contains very clear and important commitments by the Irish Government. This includes the commitment to facilitate the fullest possible cooperation with the Legacy Commission, to establish a dedicated unit within An Garda Síochána for Troubles-related cases, and to investigate all unresolved Troubles-related incidents within its jurisdiction, and ensure that any potential investigative opportunities are proactively pursued.

It is important that both governments faithfully implement, in a timely fashion, processes that are human rights compliant and can command public confidence, so that we can collectively address legacy issues. Both governments recognise that faithful and timely implementation of the commitments in the Joint Framework are crucial to rebuild public confidence that legacy issues can be properly and fairly addressed.

6. Please inform how does the Government's request to appeal in the case of the Dillon and Ors v Secretary of State for Northern Ireland, [2024] NICA 59 impact the United Kingdom's obligations under the CAT, ICCPR and other international and ECHR standards? Please explain what is being appealed and what safeguards are taken to ensure that the outcome is human rights compliant.

The UK Government is absolutely committed to its human rights obligations, which it takes extremely seriously. That is why we are taking forward measures to address a number of



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section 4 Human Rights Act declarations of incompatibility made by our domestic courts in relation to the Legacy Act 203 in *Dillon*.

The UK Government has, however, pursued an appeal to the United Kingdom Supreme Court regarding findings made by to the Northern Ireland High Court (and upheld by the Northern Ireland Court of Appeal) in relation to the interpretation of Article 2 of the Windsor Framework, and additional declarations of incompatibility made by the Northern Ireland Court of Appeal in relation to disclosure and effective next of kin participation.

The Northern Ireland Court of Appeal's findings in *Dillon* regarding disclosure and effective next of kin participation raise crucial points of principle for the UK Government that require clarity from the UK Supreme Court. The primacy of the Executive in decisions relating to the security of the State is a principle long recognised by the UK Courts, and is a crucial element of the State's ability to keep people safe.

The case was heard by the UK Supreme Court in October 2025, and judgment is pending.