



An tÚdarás Clárúcháin Maoine  
Property Registration Authority

Property Registration Authority

## Statement on our Integrity Framework

Agreed by the Management Board 28<sup>th</sup> July 2022

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## 1 Integrity underpins our purpose

The Property Registration Authority (PRA) is the State body with responsibility for the Land Registry and Registry of Deeds. Our mission is to safeguard property rights and transactions in Ireland. As custodians of the National Land Register, our function is to provide a system of registration of title to land which is accurate, reliable and readily accessible. Our role, therefore is one of stewardship and good governance of public funds and data resources in relation to property registration.

We achieve our purpose by having in place an overarching, comprehensive and sustainable framework for driving integrity in the organisation and in the provision of our services. Over time we have undertaken a significant body of work in embedding integrity in our organisation.

Within the PRA Integrity Framework, there are a number of policies and initiatives, specific to our function and where appropriate relevant internal policies and related documents are published on the PRA's website [www.prai.ie](http://www.prai.ie). For operational and security reasons, some of these documents are held internally only. Relevant policies and legislation, emanating from central Government, also underpin our Integrity Programme and are available at [www.gov.ie](http://www.gov.ie) or at [www.Irishstatuebook.ie](http://www.Irishstatuebook.ie).

The PRA has also established an Integrity Oversight Group, comprising managers from key functions, which meets quarterly to discuss progress and opportunities in terms of the Integrity Framework.

## 2 Our commitment to integrity

The following sets out key principles in our commitment to integrity.

- The PRA is committed to safeguarding the integrity of the National Land Register and to upholding integrity in all respects through its processes and procedures and in the conduct and behaviours of its employees.

- The PRA commits to promoting integrity in the workforce through ongoing and mandatory learning and development initiatives.
- The PRA complies with the full panoply of Civil Service financial controls and the Public Spending Code, the Civil Service Code of Standards and Behaviour and all circulars and codes emanating from the Department of Public Expenditure and Reform. In addition, we will adhere to our own Code of Ethics and Behaviours Framework.
- The PRA recognises that economic crime is on the increase, and has zero tolerance in relation to:
  - fraud;
  - corruption;
  - all forms of bribery, whether undertaken directly or through third parties;
  - facilitation payments<sup>1</sup>; and
  - any misuse of the National Land Register as a conduit for money laundering activities.
- The PRA will endeavour to identify, monitor and manage any conflicts of interest or improper influence which may give rise to a risk of bribery – actual, potential or perceived – in line with our Code of Ethics.
- The PRA will adhere to its corporate statutory reporting obligation under the Criminal Justice Acts to report suspicious activity coming to light in the course of its work and will enhance the awareness of its employees regarding their own individual responsibility in this regard. A Deputy Registrar (Legal) has been designated for decision making in relation to reporting suspicious activity to An Garda Síochána.

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<sup>1</sup> Facilitation payments have been described as small unofficial payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement. (Transparency International: Business Principles for Countering Bribery 2013).

- The PRA will assist An Garda Síochána when requested in the proper investigation of offences.
- The PRA will mitigate the risk of fraud through its Counter Fraud Framework, Policy and allied activities. The Head of Quality and Compliance has responsibility for this function. A Deputy Registrar (Legal) has responsibility for provision of legal support to the Counter Fraud Function.
- The PRA will encourage and support employees to speak up where necessary and will promote and regularly update its Protected Disclosures Policy.
- The PRA welcomes complaints made in good faith, and views them as opportunities for organisational learning and improvement. All complaints made in relation to any employee will be managed in line with our internal Policy on Managing Complaints Concerning Staff of the PRA.
- The PRA will comply with the provisions of the Civil Service Disciplinary Code in addressing issues of misconduct of any of its employees. The Head of HR has responsibility in this regard.

### 3 Integrity as an organisational value

Our Integrity Framework is grounded first and foremost in our espoused organisational values and strategic goals. Integrity in the PRA relates to both our purpose and our standards of behaviour. In the PRA Behaviours Framework, this duality is articulated as follows:

*“We care about our culture and the ethical tone in our organisation. Integrity as the governing ethos of the PRA, relates to our work in upholding the public trust in both the integrity of the register and property registration services. Integrity also entails adhering to moral and ethical principles and standards in our behaviours. It goes beyond legal requirements and compliance and entails ‘doing the right thing’ in all circumstances.”*

## 4 Integrity and the National Land Register, data and systems

A register can be defined as a source of true data, with a clearly defined custodian. In the PRA we speak of the integrity of the register in the sense that people should be able to rely on and trust the integrity of the data contained therein. In our Statement of Strategy 2022-2024 we have committed to maintain the accuracy, integrity and reliability of the National Land Register through consistent quality business procedures, metrics and reporting and a secure digital infrastructure subject to ongoing review and development. This extends to the integrity of all ancillary data, personal or otherwise, and the systems and infrastructure that underpin it. We have further committed to ongoing review and development of our Data Governance capability, Data Protection and cyber security measures, Counter Fraud framework and Anti-Money Laundering (AML) reporting protocols.

## 5 Integrity as a strategic goal

The first strategic goal in the PRA's Statement of Strategy is to maintain the accuracy, integrity and reliability of the Register. Security of title, which is the key outcome of the registration system, allows those transacting with registered land to rely on the data we hold and to know that the PRA will protect registered property rights and data through its governance and integrity frameworks.

## 6 Integrity and our Corporate Governance Framework

Our Corporate [Governance Framework](#) is a key support for all our employees and provides further evidence of how integrity is embedded in PRA operations and delivery of services. The Governance Framework was developed in accordance with requirements as set out in the Corporate Governance Standard for the Civil Service, underpinned by principles that include:

- supporting a culture and ethos which ensures behaviour with integrity, a strong commitment to ethical values and respect for the rule of law;
- transparency;
- developing organisational capacity;
- managing risk and performance;

- stakeholder engagement.

Our Corporate Governance Framework is a live document which is reviewed regularly to take account of changes arising in our authorising environment or any identified compliance gaps. Consequently, each iteration, in practice, provides an active learning opportunity for the organisation. In addition, adherence to well documented work practices and controls enables our employees to confidently perform their duties with integrity in an ethical, open and transparent manner.

## 7 Integrity in our Code of Ethics and Behaviours Framework

The PRA Code of Ethics forms part of building a values-based organisation which promotes high standards of integrity and conduct in the delivery of property registration services. The Code applies to all PRA employees and Authority (Board) members. It covers both external interactions between persons working for the PRA and the general public, and also interactions as between colleagues, and with other public servants.

The Code commits the PRA to perform all of its statutory functions in a manner that demonstrates its full commitment to integrity, accountability and honesty. Members of the Authority and staff at every level have an individual responsibility to maintain public trust and in so doing protect the PRA's good reputation. Authority members and employees are therefore required to refrain from acting in a manner which they know, or suspect, is illegal, improper, corrupt or dishonest.

The PRA Code covers *inter alia* acting corruptly, accepting or soliciting bribes, gifts, hospitality, expenses, and conflicts of interest, commercial and political affiliations. It co-exists with a number of other external and internal policies covering conduct and behaviour including:

- Civil Service Code of Standards and Behaviour;
- Ethics in Public Office Acts, the Prevention of Corruption Acts;
- Official Secrets Act 1963;
- Standards in Public Office Act 2001;

- relevant circulars issued by the Departments of Finance and Public Expenditure and Reform;
- PRA Behaviours Framework 2019;
- Practice Directions and Office Notices which the PRA may issue from time to time.

## 8 Integrity in meeting our Public Sector Duty obligations

In common with all public sector organisations we have a statutory obligation to uphold the Public Sector Equality and Human Rights Duty as per Section 42 (1) of the Irish Human Rights and Equality Commission Act 2014. We therefore pledge to:

- a) Eliminate discrimination;
- b) Promote equality of opportunity and treatment of our staff and the persons to whom we provide services;
- c) Protect the human rights of our members, staff and the persons to whom we provide services.

To this end, our PRA Public Sector Duty Strategy was developed and is being implemented and updated on an ongoing basis. A comprehensive report on the PRA's approach to the [Public Sector Duty](#) was developed in 2021 and was the basis for a project shortlisted for the CIPD HR Awards 2022.

## 9 Integrity in the use of personal data

We are committed to safeguarding the rights of all individuals to privacy and integrity relating to the processing of their personal data, including both customers and staff. This will be achieved by meeting the objectives of our Data Protection Strategy. Accompanying this, is our [Data Protection Policy](#), which details how we approach and implement our responsibilities under data protection.

Data Protection Impact Assessments (DPIA), are carried out in advance of all projects and change initiatives, to identify if the processing of particular data may be unnecessary. The PRA

complies with [Article 15 of GDPR](#), under which data subjects have a right to access their personal data and to be informed of the type of data held. As required by GDPR, the PRA has a substantial Breach Management Policy that details how data breaches will be managed as well as assisting staff with the identification of risks to both the PRA and the data subject. This also outlines the correct response following an assessment of a breach. The PRA also maintains a Record of Processing Activities (RoPA) identifying every category of personal data we process and how we manage that data.

The work done by our Data Protection Unit (DPU) to increase staff awareness in this area is continuous, with regular eLearning, workshops, business awareness seminars as well as work done by our Data Protection Network (DPN). This facilitates effective communication between the DPU and all divisions in the PRA.

A Data Governance Steering Group has been established and specific Data Governance Principles have been developed to align data-related policies, processes and activities across the PRA.

## 10 Integrity in our workplace

We recognise the importance of developing an ethical workplace and the valuable contribution of workers who raise concerns about wrongdoing. We subscribe to the [Integrity at Work](#) (IAW) programme, a [Transparency International Ireland](#) (TII) initiative. We are committed to protecting workers who make protected disclosures. Therefore, we have signed and comply with the IAW Pledge to ensure that workers reporting wrongdoing will not face penalisation and that we will take action in response to the concerns raised.

We continually raise awareness among our employees of TII resources that encourage and provide support for staff to [Speak Up Safely](#) in the event of suspected wrongdoing. We also actively promote the PRA's own [Protected Disclosures Policy](#).

## 11 PRA initiatives in countering fraud

We have a dedicated counter fraud liaison officer as well as interrelated policies and procedures specifically targeted at countering fraud. Our mission is to safeguard the property rights of registered owners and applicants and to protect public funds and assets, such as personal data and valuable spatial datasets, with which we have been entrusted. We aim to have an appropriate set of policies and procedures in place to minimise the risk of fraud through effective best practice, prevention, detection, response and deterrent measures.

One of the tools available to the public in assisting with the prevention of property fraud is the PRA's [Property Alert Service](#). This is a free, online service available to the public that allows property owners to monitor up to three registered properties and to track activity on those properties, including possible fraudulent activity.

## 12 Reporting suspicious activity and assisting criminal investigations

The PRA's Protocol for the Reporting of Potential Money Laundering to An Garda Síochána (AGS) was put in place as part of an internal review of its statutory reporting obligations, in particular under criminal legislation. It is acknowledged that criminals have previously and will continue to use the purchase and selling of property as a means of money laundering. Anti-money laundering procedures are necessary to safeguard the integrity of the National Land Register and mitigate against its use as a conduit for integration of the proceeds of illegal activity into the legitimate economy. This includes compliance with our statutory reporting obligations, at individual and corporate level, to report suspicious activity in the course of our work to An Garda Síochána, under Section 19 of the Criminal Justice Act 2011. A Deputy Registrar has been designated as the responsible person for decisions on whether to refer matters to An Garda Síochána. They also have responsibility for maintaining records and files associated with AML as well as reporting on progress and compliance.

In addition, the PRA is also obliged to assist in the proper investigation of offences. There are protocols in place for data disclosure to An Garda Síochána and we are committed to assisting such investigations and providing information where requested.

## 13 Regulation of lobbying

The [Regulation of Lobbying Act 2015](#), together with its associated code of conduct, regulations and guidelines, aims to ensure that lobbying activities are conducted in accordance with public expectations of transparency and that decisions are made in the public interest. Under this Act, interactions between lobbying bodies and Designated Public Officials (DPOs) must be reported by the lobbyists. The CEO of the PRA is a DPO under this Act. Interactions can be casual, either oral or written and may occur in social settings or on social media and the PRA adheres to the guidance from the Standards in Public Office Commission (SIPO) in this regard.

## 14 Integrity of our financial controls

As a Civil Service body, we are subject to rigorous scrutiny when it comes to the spending of public funds. The PRA's Chief Executive Officer is also the Accounting Officer responsible for the annual appropriation accounts (and financial statements) for Vote 23, which are published by the Office of the Comptroller and Auditor General on its [website](#), along with that Office's reports on the basis of its annual audits. We are also subject to the [Estimates](#) and Vote Management process, managed by the Department of Public Expenditure and Reform.

In addition, the PRA's Audit and Risk Committee, whose membership has external representation, oversees an annual schedule of Internal Audits (including a rigorous review of the PRA's internal controls). We augment this process with an annual programme of quality and compliance audits undertaken by our Quality and Compliance Division.

Furthermore, we are committed to full compliance with the requirements contained in relevant circulars issued by the Department of Public Expenditure and Reform, including:

- Circular 14/21 Arrangements for Oversight of Digital and ICT-related Initiatives in the Civil and Public Service;
- Public Spending Code: A Guide to Evaluating, Planning and Managing Public Investment 2019;

- Circular 20/2019: Promoting the use of Environmental and Social Considerations in Public Procurement.

## 15 Integrity in procurement of goods and services

Public procurement is governed by EU and national rules. All Government Departments and Public Service Bodies are subject to the [National Public Procurement Policy Framework](#), which sets out the overarching policy framework for public procurement in Ireland and comprises five strands:

1. Legislation (Directives, Regulations);
2. Government Policy (Circulars etc.);
3. Capital Works Management Framework for Public Works;
4. General Procurement Guidelines for Goods and Services;
5. More detailed technical guidelines, template documentation and information notes as issued periodically by the Policy Unit of the [Office of Government Procurement](#).

Procurement transactions and decisions must in all respects be fair, equitable and ensure value for money (VFM). As a contracting authority we must be able to justify decisions made and actions taken. Procurement practices are subject to audit and scrutiny under the Comptroller and Auditor General (Amendment) Act 1993, and the Local Government Reform Act 2014, and our Accounting Officer is publicly accountable for expenditure incurred. Contracting authorities are responsible for establishing arrangements to ensure the proper conduct of their affairs, including conformance to standards of good governance and accountability with regard to procurement.

## 16 Embedding integrity through effective compliance

The PRA has developed a Compliance Framework as a component of its overall Corporate Governance structures, and it plays a significant role in:

- Underpinning the effective implementation of our governance principles generally;
- Providing satisfactory evidence of such compliance;
- Managing risk;
- Providing appropriate assurances as sought by our Accounting Officer/Chief Executive;
- Embedding a compliance culture.

The PRA's Quality and Compliance Division oversees our Compliance Framework, which comprises the following main elements:

- Corporate Compliance Assurance List;
- Divisional Compliance;
- Reviews of Specific Issues;
- Quality and Compliance Audits;
- Tracking Implementation;
- Compliance Reporting.

The purpose of the Compliance Framework is to provide a structure and processes to drive, monitor and report on compliance across a range of statutory, policy and administrative requirements across the organisation. In short, the aim is to provide assurance to the CEO and other stakeholders that the PRA is doing what it is supposed to be doing.

The provision of such assurances to the Accounting Officer that we are compliant with our statutory and governance obligations, including oversight by the Oireachtas, is an important activity that evidences the accountability and integrity of the PRA, and underpins the legitimacy of its activities.

Our Corporate Governance measures are applied within an authorising environment which includes constitutional and statutory provisions. As a Civil Service organisation, we comply in particular with requirements under the following legislation:

- Ministers and Secretaries' Acts 1924–2013;

- Civil service Regulation Acts 1956-2005;
- Comptroller and auditor General Acts 1866-1998.

## 17 Contact details

For further information on any aspect of the PRA's Integrity Framework, please contact [Compliance@prai.ie](mailto:Compliance@prai.ie).