Northern Ireland Assembly

# Additional Report by the Assembly Commissioner for Standards on Complaints made against Mr Paul Givan MLA

Assembly – Confidential

## Summary

1. This report sets out my considerations and findings in respect of a request by the Committee for Standards for additional enquiries to be made into aspects of the trip undertaken by Mr Paul Givan MLA to Israel 23rd to 31st October 2025.

2. The request was received after the submission of my report into my findings on the matter was submitted to the Committee and my subsequent appearance before the Committee to present those findings.

3. This report should be read in conjunction with my initial report.

## Request from The Committee for Standards

4. My report into my findings in respect of complaints made regarding Mr Givan's trip to Israel was submitted to the Committee for Standards on 8th April 2026 after which I appeared before the Committee on 29th April 2026 to present those findings.

5. On the 28th May 2026, the Committee wrote to me[1] requesting further consideration in respect of a number of issues as summarised below;

    - Exactly where and to whom the initial invitation to join the delegation to Israel was sent.
    - Further clarity as to why the invitation was accepted by Mr Givan as Minister of Education and on Department of Education headed paper.
    - Why Mr Givan's office was involved in supporting the visit to any extent and the cost of such support.
    - Whether the use of official resources constituted a breach of the Ministerial Code of Conduct.
    - Whether the involvement of civil servants in making arrangements for the trip constituted a breach of the Ministerial Code of Conduct.

## Further Enquiries

6. The following further enquiries were conducted in respect of the Committee's request;

    - Wrote to[2] and received a response from[3] Mr David Malcom, Permanent Secretary.

[1] Document 1
[2] Document 2
[3] Document 3

- Wrote to[4] and received a response from[5] Mr Givan MLA.
- Interviewed Mr Givan MLA.

**Correspondence from Mr David Malcolm, Permanent Secretary**

7. On 3rd June 2026 I wrote to Mr Malcolm regarding the use by Mr Givan of official resources to finalise arrangements for his trip to Israel. I specifically enquired as to whether the use of official resources was appropriate in the circumstances and whether in doing so Mr Givan required Private Office staff to act in any way which would conflict with the Northern Ireland Civil Service Code of Ethics.

8. On 26th June 2026 Mr Malcolm responded. His stated understanding was that there was some initial confusion as to whether the trip was to be treated as Ministerial or personal and that follow up activity would have included time spent on that initial period when assessing the invitation.

9. He stated that Private Offices often engage with their Minister's Party or Constituency offices around logistics of aligning diaries and how travel arrangements impact on Ministerial business.

10. He did not consider that anyone acted inappropriately in those circumstances.

11. He further stated that it was his understanding that the Head of the Civil Service considered whether any civil service staff were required to act in any way which conflicted with the NICS Code of Ethics and that no such breaches were found.

**Correspondence from Mr Paul Givan MLA**

12. On 3rd June 2026 I wrote to Mr Givan MLA in respect of the request from the Committee. On 30th June 2026 I received a response from Mr Givan MLA.

13. Mr Givan stated that the precise capacity in which he was invited to attend was not clear at the outset. His initial assessment was that his attendance would be at a Ministerial level. Only later, after the invitation had been accepted, did it become clear that, as other political representatives had also been invited, he would not be attending as Minister. The initial handling of the correspondence should therefore be viewed in that context.

14. Once that decision had been made, no departmental briefing was commissioned or provided, nor was he accompanied by any departmental staff.

[4] Document 4
[5] Document 5

15. Mr Givan emphasised that support provided by his Private Office was absolutely minimal and confined to routine administrative matters such as diary alignment and travel logistics. He stated that this was standard practice and necessary to ensure that Ministerial responsibilities are not adversely affected and as the personal information provided was readily available within his Private Office.

16. Mr Givan further stated that no Departmental resources were used for party political purposes nor were any officials asked to act in any way that would conflict with the NICS Code of Ethics.

**Interview**

17. Having considered the responses from Mr Malcolm and Mr Givan, I wrote again to Mr Givan[6] inviting him for a further interview to clarify some aspects of his response. The interview took place of 23rd July 2026[7].

18. Mr Givan clarified that the invitation came to his NI Assembly MLA email account which he then forwarded to his Ministerial Private Office as he intended to facilitate this visit. The Private Office had then engaged on that basis.

19. When asked to elaborate on the circumstances, Mr Givan replied;

*I receive vast amount of correspondence that come to my MLA account. Almost daily, I am receiving correspondence, even at times from statutory bodies to me, Paul Givan, but it comes to my MLA account. So there would be a record of hundreds of emails that I have received to that MLA account that I then forward on to the private office. At the outset when I received that invitation, it referenced the devolved leaders. The indication to that was, it was an invite then for me as minister, but as it became apparent whenever more details emerged, then primarily, it was for me as an MLA, but that wasn't clear. Whenever you look at the initial invite that came from the Israeli embassy, that reference to devolved leaders led me to have a view that that was something that I would deal with in my ministerial capacity. As it transpired, later became aware there were other political reps who had been invited. Therefore, the visit then was taken forward in my capacity, primarily as an MLA as opposed to a minister.*

*Right up to quite late, I had already been indicating who in the department may have to accompany me on the visit. So the department was engaging on it, and it was only then whenever it became clear that, actually, there was very limited ministerial work involved in it. In fact, I had indicated, I think, in response to when I forwarded it on to the department*

[6] Document 6
[7] Document 7

*and then to the Israeli embassy, because I am Minister for Education, if there was an education aspect to the trip, I would be willing to facilitate that. That didn't transpire until, actually, I was in Israel. Hence why no official came out with me. There was no education component part of the visit that had been outlined by the embassy to the department. That is why there was no briefing commissioned into any aspect of the trip by the department, because there wasn't any education-related aspect to it. So that is something that - it can become clear as you engage in invites that you have received, that it is in a personal MLA capacity rather than a ministerial capacity. It isn't always clear at the outset when an invite has been given to me, you know, is it as a minister or is it as an MLA?*

20. When asked regarding the involvement of his Private Office on any occasion when he would be away from the office, Mr Givan advised the following;

*Always. I will inform, as I have done already - you know, this summer, I am on leave, but I will need to have a ministerial computer with me. So I will inform the private office, 'Here are the dates where I am away,' if it is on a purely personal capacity, you know, family holiday, but I bring my ministerial work with me. They then need to make sure the appropriate IT arrangements are put in place for access to my ministerial computer whenever I am abroad. So those staff link in with the IT people in order to make sure that I can do that. So yes, and there are times whenever engagements that have been maybe put into the diary then, because of personal reasons, that has to be changed. So the private office will always be informed of that, and they will link in closely with my constituency office where I operate my diary through my constituency office, and that includes any personal engagements. So the private office, whether it is me directly, which is often the case, where I will just say to them, 'Listen I am away for a couple of days. We need to move these meetings,' or my constituency office will link in with my private office to coordinate that.*

21. Mr Givan was then asked why his Private Office continued to be involved in arrangements such as travel logistics instead of his party office. He replied;

*The private office, all of my passport details, so that all sits very readily. At the outset, it was only very late it became clear that there wasn't going to be a ministerial capacity for this. So when the invite initially came in, it came in where it referenced the devolved leaders. Therefore, at that point, I considered it may well have been a ministerial visit. So there was connection to do with that, as well as some flight arrangements where I wanted to be able to actually... Even though I was going now as an MLA, I am still going with my ministerial computer. I am going to be engaging in ministerial work. We were trying to get flights that were maximising my opportunity to carry out my other ministerial duties. So that still creates an interface with the private office when it comes to coordinating - whether it is an MLA visit, there was a connection there, and it was to assist my ability to carry on my ministerial work where there may have been some involvement.*

22. When asked about the cost of the use of Private Office resources, Mr Givan stated that he would have been surprised if it had even reached the level of an hour's work.

23. I then asked the following;

**I just want to finish with just referencing the ministerial code around the use of official resources. The code states that ministers require to ensure that official resources are not used for party political purposes. Would you agree that there is a clear and important requirement then to ensure that there is a distinction between how your private office is used and how maybe a party office or whatever is used, for purposes of transparency and accountability? So is there anything you want to say in relation to these circumstances, as regards the code's requirement?**

*It is for others to determine, but I am clear that I didn't muddy the waters when it comes to something of a party political nature with a ministerial... In fact, I went out of my way to make sure that wasn't the case. I referenced this in the previous interview. When it came to the actual press release, it wasn't of a party political nature whatsoever, and the officials have followed out their codes and ethics appropriately and all of that. So I don't see where anyone here has blurred the lines. Setting aside on this issue, there is always - what becomes 100 per cent crystal clear, this is a ministerial invitation, or it is a ministerial function. I am also - and ministers are also then members of the Assembly from a constituency's perspective and they are members of a political party. So there is likely going to be a spectrum where it is very easy to say purely ministerial, but if a minister... Take the Minister for the Economy is going to a Sinn Féin meeting to talk about economic matters and that is the economic minister who is involved, then I suspect the spectrum is moving somewhat to consider, well, is there a party political engagement or not? It is purely to do with a political party and a briefing on the economy. Would it be appropriate for the economy minister to commission her department to provide a briefing for her to take to that meeting? I would say it would be. I would say that that would be appropriate, but there would be a spectrum where you are probably trying to adjudicate. At what point does that become solely party political or solely an MLA? There is a continuum, that you need to have an assessment as to what is reasonable on this one. I am very clear in my mind that I did not blur the lines whatsoever when it came to this visit and the use of departmental resources for it.*

**<u>Commissioner's Response to The Committee's enquiries</u>**

24. The purpose of my additional enquiries were to specifically address the issues identified by the Committee in their correspondence of 28th May 2026. My findings in relation to these issues are as below. As stated previously, this report should be read in conjunction with my initial report.

**Capacity in which the respondent undertook the trip**

25. I acknowledged in my initial report that the distinction between acting as an MLA and as a Minister can, at times, be blurred or indistinct. My additional enquiries with both Mr Givan and the Permanent Secretary have found that this was the case when the invitation was received.

26. The invitation was received in Mr Givan's MLA account which he then forwarded to his Private Office as is his normal practice. The acceptance of the invitation was issued 3 days after receipt of the invitation, on departmental paper, during the initial period when it was unclear in what capacity Mr Givan would be attending. As further details were received about the trip, it became clear that he would be attending in his MLA capacity.

27. Ultimately, no departmental advice was sought or provided regarding the trip as would be the case for any Ministerial trip nor did any departmental officials attend any part of the trip.

28. I remain satisfied that Mr Givan participated in the delegation in his MLA capacity.

**Use of public funds/departmental resources**

29. Mr Givan has stated that there was an initial period of confusion when it was unclear in what capacity he would be attending.

30. Regarding this trip, the Private Office were initially involved due to the lack of clarity regarding the capacity in which he was attending. When this issue was clarified Mr Givan stated that the Private Office involvement in travel arrangements continued in order to maximise his opportunity to continue with ministerial work and to facilitate the IT arrangements. In addition, the necessary private information for travel arrangements were readily available in the Private Office.

31. Generally, the Private Office would be involved to some extent at any time Mr Givan would be absent from the office to manage diary commitments, make IT arrangements etc.

32. Mr Givan is adamant that the use of departmental resources was *absolute minimal*.

33. Mr Malcolm, Permanent Secretary, clarified that follow up work, noted as less than 1 hour, included time spent on that initial period of confusion. He stated that the work undertaken by the Private Office was described to him as negligible and that he *would struggle to accuse anyone of acting inappropriately* in the circumstances.

34. It is reasonable to accept that there will be some degree of cross over between a Minister's Private Office and work to make arrangements for MLA or private business or absence from the office. Each case must therefore be assessed on its own merits.

35. In this case, both the previous and current Permanent Secretaries are satisfied that the work undertaken by the Private Office was negligible and not inappropriate. Whilst acknowledging and endorsing the critical need to maintain a clear distinction between the work of a Minister's Private Office and that which relates to his MLA or private business, I remain satisfied that the use of public resources was not to the extent as to engage the Ministerial Code of Conduct.

**Use of official resources for party political purposes**

36. The Ministerial Code of Conduct[8] requires that Ministers must at all times ensure that official resources are not used for party political purposes.

37. A party political purpose can be considered as a purpose whose primary aim is to influence the public to support or oppose a political party or elected official. The delegation to Israel was a multi-party group framed in the invitation as offering an opportunity to 'experience the country's distinctive cultural, innovative and historical heritage' and 'to hear from a variety of voices across the political spectrum.

38. Mr Givan, in interview described the visit as a cultural, fact-finding exchange and an opportunity to experience and hear from people. The press release issued by Mr Givan on the Department website contained no political opinion or commentary.

39. In the circumstances, it is not clear that the visit could be categorised primarily as having a party political purpose.

40. In any event I have found that the use of official resources was not to the extent as to engage the Ministerial Code of Conduct.

**Political Impartiality of the Civil Service**

41. The Ministerial Code of Conduct requires that Ministers must at all times, uphold the political impartiality of the civil service, not asking civil servants to act in any way which would conflict with the Northern Ireland Civil Service Code of Ethics[9].

[8] Northern Ireland Act 1998, Schedule 4, Code of Conduct 1(1)(h)
[9] Northern Ireland Act 1998, Schedule 4, Code of Conduct 1(1)(k)

42. In his response, Mr Malcolm, Permanent Secretary, indicated that the Head of the Civil Service had considered the issue and found there to be no such breaches on the part of any staff involved.

43. There is therefore insufficient evidence to satisfy me that there is a prima facie case that a breach of this section of the Ministerial Code of Conduct has occurred.

**Conclusion**

44. A finding of a breach of the Ministerial Code of Conduct is a significant matter with serious implications. Any such finding must therefore reasonably and proportionately reflect the specific facts and circumstances of the particular case under consideration.

45. Ministers are also MLAs and party members which presents the opportunity for those roles, on occasion, to overlap to some extent. The initial lack of clarity as to the capacity in which Mr Givan was invited to attend the delegation has contributed to the overlap in this case.

46. Whilst I have found no breaches of the Ministerial Code of Conduct in this case, the Code does place clear and necessary requirements on Ministers in respect of the use of official resources and staff. Ministers must therefore maintain a clear distinction in situations of potential overlap and exercise particular care to ensure that they are transparent and accountable in their use of official resources and staff.

**Appendix A**

| Document | Description |
|---|---|
| 1 | Correspondence from the Committee for Standards |
| 2 | Letter to Permanent Secretary |
| 3 | Response from Permanent Secretary |
| 4 | Letter to Mr Givan |
| 5 | Response from Mr Givan |
| 6 | Invitation to interview letter to Mr Givan |
| 7 | Interview transcript |

Northern Ireland Assembly

**COMMITTEE ON STANDARDS AND PRIVILEGES**

**ASSEMBLY RESTRICTED**

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Mr Stephen Wright
Commissioner for Standards
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Issued via email to: standardscommissioner@niassembly.gov.uk

28 May 2026

Dear Stephen

**Ref: Complaints against a Minister: Report by the Assembly Commissioner for Standards - Case ID 202500112 and 202500115**

I write in follow up to your attendance at the meeting of the Committee for Standards and Privileges ('the Committee') on 29 April 2026, in respect of the above mentioned complaint cases. The Committee has asked me to convey its thanks to you for providing it with a briefing on your investigation report and for answering Members' questions.

**Committee role in relation to complaints against Ministers**

As you will be aware, the Committee does not currently have an adjudication role in complaints against ministers of alleged breaches of the Ministerial Code of Conduct ('the Code'). However, the Committee has a duty, under Standing Order 69A, to consider any investigation report by the Commissioner, including reports on ministerial complaints, and to publish such reports (on behalf of the Assembly).

The Committee also has the power, following receipt of a report from the Commissioner, to request that the Commissioner undertakes further

investigation and report back to it on the outcome of such further investigation (or on the reasons for concluding that further investigation is unnecessary).[1]

In that regard, the Committee is of the view that some issues have not been addressed in the investigation report and wishes to assure itself that a full and thorough investigation has been completed before publishing the outcome of the complaints cases. Also, the Committee recognises that you have the power to consider and decide whether rules of conduct are engaged which are separate to those cited by complainants. As such, at its meeting on 29 April 2026, the Committee decided to request that you undertake further investigation and, at its meeting on 27 May 2026, agreed that this should include the following specific matters:

**Capacity in which the respondent undertook the trip**

As discussed during your briefing on 29 April 2026, the Committee considers that there is a gap in the evidence in terms of establishing to where/whom the invitation to the respondent to join the delegation to Israel was initially sent. The invitation refers to being part of a group of "devolved government leaders" but it is unclear to the Committee from the evidence whether the invitation was directed to the respondent as a representative of his political party, an MLA or as a minister in the Northern Ireland Executive. The Committee requests that you pursue this issue as it may be relevant in supporting an analysis of the capacity in which the respondent was invited to join the delegation to Israel.

Also, the Committee notes that, during the investigation interview with you on 26 February 2026, the respondent stated, in relation to the invitation, that "primarily it was accepted in my role as a Member of the Assembly." However, in the respondent's letter (dated September 2025) to the Israeli Minister of Foreign Affairs, the invitation is accepted as Minister of Education (and on Department of Education headed paper). The Committee notes that this latter point is not included in your findings of fact.

The Committee recognises that you received a copy of the acceptance letter after you had interviewed the respondent (when the Permanent Secretary provided it to you on 16 March 2026). In the Committee's view, there is an inconsistency in the evidence and therefore requests that you also undertake further investigation of this matter.

**Use of public funds/departmental resources**

You have acknowledged (in your report and during your briefing to the Committee) that Department of Education resources had been used to facilitate the trip to Israel; however the Committee notes that you consider that

[1] Section 26 of the Assembly Members (Independent Financial Review and Standards) Act (Northern Ireland) 2011 and Standing Order 69A(3)(d)..

this was limited and not at a level which could reasonably constitute a breach of the Code.

The Committee is nonetheless concerned that it would send the wrong message to ministerial office holders, and may 'open the floodgates' for ministers using departmental resources for non-ministerial activities, if evidence of such use of public funds is not subject to the closest of scrutiny and challenge.

Again, the Committee recognises that you received the documentation, including the Private Office email trail on departmental involvement in supporting the trip, only after you had interviewed the respondent. Having considered the details of the said documentation, the Committee notes that the support provided by Private Office officials extended to requesting travel options, checking luggage allowance on flights, finalising travel details and relaying itinerary information. In light of this, the Committee requests that you undertake further investigation to establish:

(1) why the Private Office was involved in supporting the visit to any extent;
(2) why the respondent's own MLA staff/party staff did not undertake the work of replying to the invitation and liaising with the Israeli Embassy on the arrangements (in consultation with the Private Office where necessary); and
(3) an estimate of the costs to the Department of Education for all the direct and indirect support provided to the respondent in relation to the trip.

**Use of official resources for party political purposes**

The Committee is mindful that ministers are required '*at all times*' to ensure that official resources are not used for party political purposes[2]. Given the abovementioned questions as regards the capacity in which the respondent was acting and that the trip to Israel could be interpretated by some as party political, the Committee requests that further investigation be undertaken to consider whether there has been a breach of the Code specifically in this respect.

**Political impartiality of the civil service**

The Committee is also aware that ministers are required at '*all times*' to uphold the political impartiality of the civil service, not asking civil servants to act in any way which would conflict with the Northern Ireland Civil Service Code of Ethics[3]. As such, the Committee requests that you investigate, given the circumstances and the evidence (i.e. that civil servants have been involved in supporting a trip which was ostensibly undertaken largely in a non-ministerial capacity) whether there has been a breach of the Code in this respect.

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[2] Northern Ireland Act 1998, Schedule 4, Code of Conduct 1(1)(h)
[3] Northern Ireland Act 1998, Schedule 4, Code of Conduct 1(1)(k)

The Committee asks that you report back on the outcome of this request for further investigation as soon as possible.

Yours sincerely

[redacted]

**Shane McAteer**
**Committee Clerk**




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**CONFIDENTIAL**

Mr David Malcolm
Permanent Secretary
Department of Education
Rathgael House
43 Balloo Road
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BT19 7PR

Emailed to: [redacted]

3rd June 2026

Dear Mr Malcolm

**Ref Case Nos 202500112, 202500115 – Complaints regarding Minister Givan's trip to Israel**

Following the submission of my report regarding the above complaints, the Committee for Standards and Privileges have asked that I conduct further investigations into the matter. Specifically, the Committee are concerned regarding the use by Minister Givan of official resources to finalise arrangements for his trip to Israel.

The Ministerial Code of Conduct requires that Ministers must at all times;

- 1(h) – ensure that official resources are not used for party political purposes;
- 1(k) - Uphold the political impartiality of the civil service, not asking civil servants to act in any way which would conflict with the Northern Ireland Civil Service Code of Ethics;

Your previous response to me dated 16th March 2026 confirmed that Civil Service involvement was minimal and the level of resource employed was negligible consisting of less than one hour of staff time.

Could you please clarify whether you consider this limited use of resource to be an inappropriate use of official resources where the Minister had stated that he under took the trip in his capacity as an MLA?

Could you please also consider whether in undertaking those limited actions in respect of the trip, Private Office staff were required to act in any way which would conflict with the Northern Ireland Civil Service Code of Ethics?

Thank you for your continued assistance in this matter and please feel free to contact me if you wish to discuss this request or require further information or clariciation.

[redacted]

**Stephen Wright**
**Northern Ireland Assembly Commissioner for Standards**

**CONFIDENTIAL**

**PERMANENT SECRETARY**
**David Malcolm**

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Stephen Wright
Northern Ireland Assemble Commissioner
For Standards

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26 June 2026

Dear Mr Wright

**Ref Case Nos 202500112, 202500115 – Complaints regarding Minister Givan's trip to Israel**

I refer to your correspondence of 3 June and apologies for the short delay in responding due to my annual leave.

I understand that when the invitation initially came into the Private Office, there was some confusion as to whether it was to be treated as a Ministerial or Personal invitation. Follow up activity, previously noted as less than 1 hour, would have included time spent on that initial period when assessing the invitation.

Whilst it is clear that NICS staff time should not be used to support any personal or party activity, the reality is that Private Offices will often engage with their Ministers Party or Constituency offices around the logistics of aligning diaries, particularly when considering travel options and assessing how those impact on future Ministerial business. From what has been described to me of the negligible work undertaken by Private Office staff, I would struggle to accuse anyone of acting inappropriately in those circumstances.

In terms of your further question regarding the NICS Code of Ethics, I understand the Head of the Civil Service considered this issue and found there to be no such breaches on the part of any staff involved.

I trust this helps your further consideration of the issues.

Yours sincerely

[redacted]

**DAVID MALCOLM**

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Minister Paul Givan MLA
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3 June 2026

**Case ID: 202500112 & 202500115**

Dear Minister Givan

**Complaint against you by Mr Oisin McKibbin and Ms Aine McElhinney**

As you are aware my investigation into the above complaints was complete and my report submitted to the Committee for Standards and Privileges on 8th April 2026.

Having considered my report and my briefing to the Committee on 29th April 2026, the Committee has raised a number of concerns regarding my investigation and have asked me to undertake further investigations by virtue of section 26 of the Assembly Members (independent Financial Review and Standards) Act (Northern Ireland) 2011 and Standing Order 69A(3)(d). I would be grateful therefore for your early response to the matters listed below;

1) In relation to the capacity in which you undertook the trip to Israel, the Committee considered that there was a gap in the evidence in terms of establishing to where/whom the invitation to join the delegation was sent. Could you please therefore confirm where the initial invitation was received and whether it was directed to you as a representative of your party, an MLA or as a Minister of the Northern Ireland Executive.

2) The Committee also noted that in your acceptance letter to the Israeli Minister of Foreign Affairs dated September 2025, the letter is on Department of Education headed paper and whilst not actually signed, is closed as 'Paul Givan MLA, Minister of Education'. Could you please confirm therefore how and why the response was issued in this format and whether this conflicts with your stated position that your attendance was primarily as an MLA.

3) The Committee is further concerned that Department of Education resources were used to facilitate the trip and could therefore send the wrong message to ministerial office holders. Could you please therefore address the following questions;

    a) Why was your Private Office involved in supporting the visit to any extent?
    b) Why did your own MLA staff or party staff not undertake the task of making arrangements for the trip?

c) What is the estimate of costs to the Department for the support provided for the trip?

I have attached a copy of the letter from the Committee for your information and would be happy to facilitate a further interview if you feel this would assist in providing the necessary clarification.

If you have any questions about this matter please do not hesitate to contact me.

Yours sincerely

[redacted]

**Stephen Wright**
**Northern Ireland Assembly Commissioner for Standards**

**PRIVATE AND CONFIDENTIAL**

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30 June 2026

Dear Mr Wright,

**Case IDs 202500112 and 202500115 – Further Investigation**

I refer to your request for further clarification.

**Invitation**
The precise capacity in which I was invited to participate in the visit to Israel was not clear at the outset. The invitation referred to “devolved government leaders”, which reasonably indicated engagement at ministerial level. On that basis, my office responded using Department of Education headed paper. Only after that response issued did it become clear that other political representatives had also been invited.

Any suggestion of inconsistency must be viewed in that context. The initial handling of the correspondence reflected a reasonable interpretation of an inherently ambiguous invitation. Once it became clear that I was not attending in a ministerial capacity, no departmental briefing was commissioned or provided, and I was not accompanied by departmental staff. This is consistent with the position that the visit was not undertaken in a ministerial capacity.

**Resources**
In relation to Private Office involvement, as previously set out, any support provided was minimal and confined to routine administrative matters such as diary alignment and travel logistics. This is standard and necessary to ensure that ministerial responsibilities are not adversely affected and the information provided was readily available within my Private Office.

There was absolute minimal use of departmental resources and no material cost to the Department. I also undertook elements of the administrative process personally, including completion of the visa application.

For the avoidance of doubt, no departmental resources were used for party political purposes at any stage, nor were officials asked to act in any way that would conflict with the NICS Code of Ethics.

I trust this clarifies the position.

Yours sincerely,



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Minister for Education

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15 July 2026

**INVITATION TO INTERVIEW**

**Case ID: 202500112 & 202500115**

Dear Minister Givan

**Complaints against you by Mr Oisin McKibbin and Ms Aine McElhinney**

Thank you for your written response dated 30th June 2026 to my queries raised as a result of questions from the Committee for Standards.

Your response provides additional information however I do require some clarification on a number of aspects before responding to the Committee. I am writing therefore to arrange a further interview with you in relation to the above complaint. I would be grateful if you would now advise me of your availability in the near future to conduct this.

The purpose of the interview is to obtain your evidence relating to;

1. Exactly where the invitation was received and by whom.
2. Decision and rationale as to whether the trip was Ministerial or personal.
3. Formal procedures where a trip is Ministerial.
4. Usual involvement of Ministerial office staff when undertaking any party or private trip.

I would draw your attention to my statutory powers to call witnesses, to the restrictions on disclosure of information (including the contents of this letter) and to the procedures to be followed for the interview and for the investigation more generally that are outlined in the enclosed note.

Yours sincerely

[redacted]

**Stephen Wright**

**PRIVATE AND CONFIDENTIAL**

**Northern Ireland Assembly Commissioner for Standards**

**Encs**

**PRIVATE AND CONFIDENTIAL**

2025000112,115 Givan Interview 2 JULY 2026 XD - DEPTH - 14 MINS
[Other comments:]

**Okay, this interview is being tape recorded. I am Stephen Wright, Commissioner for Standards. The day is Thursday, 23rd July 2026, and the time is 10:39. I am interviewing - could you please state your name?**

R1: Paul Givan, Minister for Education, Lagan Valley Assembly member.

**Accompanying him is…**

R2: Richard Bulick, B-U-L-I-C-K.

**I just want to remind yous [unclear word 0:00:27.5] that you are not permitted to answer questions on behalf, but if you need to consult, just let me know and I will suspend the interview for that purpose. Do you want to take the oath or the affirmation?**

R1: Yes, I will take the oath.

**Go ahead.**

R1: I swear by Almighty God that the evidence I shall give shall be the truth, the whole truth, and nothing but the truth.

**Okay, thank you. Just remind you, this is a confidential interview, and nothing should be discussed. I will again send you a transcript of this when it is done, along with any additional reports to send to the committee as a result of this. So I am just going to ask you a few questions, and at the end, I will give you the opportunity to add anything that you want to do. So are you happy to go ahead?**

R1: Yes, [?happy with that 0:01:02.2].

**Okay. You have seen I copied you the letter that came from the committee. Didn't they send you a copy, and they asked a number of specific questions? So my questions are**

**largely based around that, so the first of which is around the invitation for the trip. Can I ask specifically where that landed in terms of whose inbox did it come to? Was there a covering letter with it? Where did that actually come from?**

R1: I appreciate the questions from the committee and their further due diligence around this issue. I had previously indicated - and that is the case - that the invitation came to my paul.givan@mla.niassembly.gov.uk email address, so that is my Assembly email address. It had on it reference to an invitation of devolved leaders. I forwarded that on to my ministerial private office. That is where the invitation came to, and I sent it on with an indication that I intended to facilitate this visit, and initially, the private office then engaged on that invitation.

**We will move on to that point, in terms of formal consideration as to whether you were going as a minister or personal. You indicated in your letter that your private office had accepted the invitation at that early stage before any real clarity was obtained around that issue, so can you just elaborate on that? The invitation went out on department paper.**

R1: I receive vast amount of correspondence that come to my MLA account. Almost daily, I am receiving correspondence, even at times from statutory bodies to me, Paul Givan, but it comes to my MLA account. So there would be a record of hundreds of emails that I have received to that MLA account that I then forward on to the private office. At the outset when I received that invitation, it referenced the devolved leaders. The indication to that was, it was an invite then for me as minister, but as it became apparent whenever more details emerged, then primarily, it was for me as an MLA, but that wasn't clear. Whenever you look at the initial invite that came from the Israeli embassy, that reference to devolved leaders led me to have a view that that was something that I would deal with in my ministerial capacity. As it transpired, later became aware there were other political reps who had been invited. Therefore, the visit then was taken forward in my capacity, primarily as an MLA as opposed to a minister.

**You just essentially decided that yourself? There isn't any formal assessment around these things or anything? Is it just in the circumstances, you took the view that this is…?**

R1: Right up to quite late, I had already been indicating who in the department may have to accompany me on the visit. So the department was engaging on it, and it was only then

whenever it became clear that, actually, there was very limited ministerial work involved in it. In fact, I had indicated, I think, in response to when I forwarded it on to the department and then to the Israeli embassy, because I am Minister for Education, if there was an education aspect to the trip, I would be willing to facilitate that. That didn't transpire until, actually, I was in Israel. Hence why no official came out with me. There was no education component part of the visit that had been outlined by the embassy to the department. That is why there was no briefing commissioned into any aspect of the trip by the department, because there wasn't any education-related aspect to it. So that is something that - it can become clear as you engage in invites that you have received, that it is in a personal MLA capacity rather than a ministerial capacity. It isn't always clear at the outset when an invite has been given to me, you know, is it as a minister or is it as an MLA?

**You have touched a bit on my next questions. So if it was a ministerial trip, there would be formal [?preparatory/proprietary 0:05:28.4] steps by your office?**

R1: Yes.

**Things like - you have mentioned briefings and that sort of thing.**

R1: Yes. There have been thousands of invites come in to me where it is very clear this is as a minister, and that immediately goes out to the relevant officials in the department, the commission's briefing, there will be advice even provided associated with that. If there are aspects of the trip, they will give me briefing. So if I was meeting - as I have done when I was in Washington, we had a meeting with Microsoft around in education, and I get a whole detailed briefing of who is at the meeting, what are the issues to be discussed, here is a departmental perspective of it in order to give me the right information to facilitate that meeting. So where it is very clear from the outset, then there is a process that is followed for that.

**At the end, when you went in this visit, there are no formal briefings prepared, there is no staff with you, there is none of the normal trappings of a formal ministerial visit that you would have in this case?**

R1: No.

**Okay, that is fine. So I will just move on to your private office involvement. At any time when you are absent from the office, holidays or personal trips or anything like that, is it right that there would be some involvement by your private office in terms of diary arrangements and that sort of thing?**

R1: Always. I will inform, as I have done already - you know, this summer, I am on leave, but I will need to have a ministerial computer with me. So I will inform the private office, 'Here are the dates where I am away,' if it is on a purely personal capacity, you know, family holiday, but I bring my ministerial work with em. They then need to make sure the appropriate IT arrangements are put in place for access to my ministerial computer whenever I am abroad. So those staff link in with the IT people in order to make sure that I can do that. So yes, and there are times whenever engagements that have been maybe put into the diary then, because of personal reasons, that has to be changed. So the private office will always be informed of that, and they will link in closely with my constituency office where I operate my diary through my constituency office, and that includes any personal engagements. So the private office, whether it is me directly, which is often the case, where I will just say to them, 'Listen I am away for a couple of days. We need to move these meetings,' or my constituency office will link in with my private office to coordinate that.

**So in this case, your private office were always going to be involved at the early stages when you are assessing in what capacity you are going to attend this trip. They are always going to be involved just generally in terms of diary management and IT management and all that sort of stuff. So in any event, there is going to be some involvement by the private office.**

R1: Yes.

**So the question the committee are asking in this case is why is there any further involvement? There is a limited - according to Permanent Private Secretary around this very limited amount, but there is some involvement around some of the travel logistics and stuff. Why did your private office continue to do that, but instead of…? I know you said you did some yourself, but maybe a party office or you own private staff.**

R1: The private office, all of my passport details, so that all sits very readily. At the outset, it was only very late it became clear that there wasn't going to be a ministerial capacity for this. So when the invite initially came in, it came in where it referenced the devolved leaders. Therefore, at that point, I considered it may well have been a ministerial visit. So there was connection to do with that, as well as some flight arrangements where I wanted to be able to actually… Even though I was going now as an MLA, I am still going with my ministerial computer. I am going to be engaging in ministerial work. We were trying to get flights that were maximising my opportunity to carry out my other ministerial duties. So that still creates an interface with the private office when it comes to coordinating - whether it is an MLA visit, there was a connection there, and it was to assist my ability to carry on my ministerial work where there may have been some involvement.

**Yes, brilliant. That is perfect. They did ask - and I am referring to their letter specifically around an estimate of the cost to the Department of Education for all of the direct and indirect support provided. Now, the previous Permanent Secretary said less than an hour of someone's time. Is that what we are talking about in terms of cost? Now, you have explained in detail that there is an almost ambiguity, so those reasons for your private office to be involved anyway. Are we talking about an hour of somebody's time, if that is what it is?**

R1: I don't manage the time of the private office and how staff discharge it. So I can take it based upon the assessment of those officials within the department, the very limited nature of the work that was involved in it, if it was even that. I would have been surprised if it had even reached that level of an hour's work.

**Okay. I just want to finish with just referencing the ministerial code around the use of official resources. The code states that ministers require to ensure that official resources are not used for party political purposes. Would you agree that there is a clear and important requirement then to ensure that there is a distinction between how your private office is used and how maybe a party office or whatever is used, for purposes of transparency and accountability? So is there anything you want to say in relation to these circumstances, as regards the codes requirement?**

R1: It is for others to determine, but I am clear that I didn't muddy the waters when it comes to something of a party political nature with a ministerial… In fact, I went out of my way to make sure that wasn't the case. I referenced this in the previous interview. When it came to the actual press release, it wasn't of a party political nature whatsoever, and the officials have followed out their codes and ethics appropriately and all of that. So I don't see where anyone here has blurred the lines. Setting aside on this issue, there is always - what becomes 100 per cent crystal clear, this is a ministerial invitation, or it is a ministerial function. I am also - and ministers are also then members of the Assembly from a constituency's perspective and they are members of a political party. So there is likely going to be a spectrum where it is very easy to say purely ministerial, but if a minister…

Take the Minister for the Economy is going to a Sinn Féin meeting to talk about economic matters and that is the economic minister who is involved, then I suspect the spectrum is moving somewhat to consider, well, is there a party political engagement or not? It is purely to do with a political party and a briefing on the economy. Would it be appropriate for the economy minister to commission her department to provide a briefing for her to take to that meeting? I would say it would be. I would say that that would be appropriate, but there would be a spectrum where you are probably trying to adjudicate. At what point does that become solely party political or solely an MLA? There is a continuum, that you need to have an assessment as to what is reasonable on this one. I am vey clear in my mind that I did not blur the lines whatsoever when it came to this visit and the use of departmental resources for it.

**That is all the questions I have, so just before [unclear words 0:13:41.9], anything else you want to say?**

R1: No.

**Okay. Well, thanks very much for your time.**

R1: Thank you.

**[END OF TRANSCRIPT]**