

# National Milk Agency



## **CODE OF BUSINESS CONDUCT FOR STAFF OF THE NATIONAL MILK AGENCY**

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The Code of Conduct of the National Milk Agency is based on the principles of fairness, loyalty, integrity, legality, confidentiality and good customer service. The objectives of this Code are to:

- establish a set of ethical principles for employees
- promote and maintain confidence and trust in the Agency, in all its activities and in its employees.
- Ensure that all of the Agency's business is transacted with integrity .

The Agency's objective is to be a nationally and internationally recognised organisation that champions best practice in public administration and management, thereby contributing to a public service that operates to the highest standards. The Agency will attract and retain staff who are committed to its vision of a learning organisation, and will provide an environment where staff can express their talents fully in support of it.

The Agency aspires to be honest and ethical in all of its operations and dealings, to adhere to the highest accepted standards of corporate governance and to behave responsibly towards the health, safety and welfare of its employees. The Agency acts and operates through its staff and therefore will ensure that they behave to the standard that is required to enable the Agency achieve its aspirations. This will require fairness, loyalty, integrity, legality, confidentiality and good customer service.

The Agency is committed to its relevant responsibilities to the wider community - respecting the environment and its obligations to its neighbours. The Agency's staff are particularly cognisant of the Agency's aspired role as promoters of best practice in public administration and the implications of this vision for our own behaviour.

### **FAIRNESS**

The Agency is at all times committed to fairness in all its business dealings and in its dealing with its employees. This requires that each employee must be fair in each of their individual dealings with customers, suppliers and fellow employees.

The Agency's staff undertake to compete vigorously in their business dealings but also ethically and honestly.

Competitive tendering shall be the normal procedure in our procurement processes. The Agency shall operate a procedure detailing prescribed levels of sanctioning for relevant expenditure.

The Agency is committed to compliance with the Prompt Payments Act.

It will be standard practice that the disposal of Agency assets or the granting of access to its property or infrastructure for commercial arrangements, with an anticipated value at or above the level of €70,000, should be by auction or tendering process, other than in exceptional circumstances, such as sale to a charitable body.

A record of all disposals with a material value to staff or their families or connected persons will be noted in a register kept for this purpose.

The Agency recognises that fairness requires compliance with all equality legislation and that bullying or sexual harassment can never be tolerated from any employee and it will act to ensure compliance in these areas.

## **LOYALTY**

Staff owe loyalty and commitment to the Agency in all its business activities.

Staff should not engage in or support an outside activity or organisation which is competing with the Agency. They should ensure that any of their outside activities do not in any way impair their ability to give regular and punctual satisfactory service to the Agency.

## **GIFTS**

The receipt of gifts by Agency staff must be governed by the highest standards and must not give rise to any conflict of interest. A gift is any benefit which is given to a staff

member free of charge or at less than its commercial price. Staff may accept and retain gifts of modest value (diaries, pens etc). Any gift of more significant value should be refused or handed over to the Agency.

A gift, other than a gift of modest value, given to a staff member by virtue of his /her official relationship with the donor or the Agency's commercial dealings with the donor, should be regarded as property of the Agency.

Cash or cash vouchers may not be accepted regardless of the amount.

Staff members may not approach any business with which they have contact through their official duties seeking sponsorship or support for any external club, association, trade union or other organization. Staff members should not accept special facilities or discounts on private purchases from suppliers with whom they have official dealings.

## **HOSPITALITY**

It is accepted that staff members should not be put in a position where they cannot accept what are regarded as normal courtesies in business relationships. That being said, in their contacts with outside organisations or persons, every care must be taken by staff to ensure that their acceptance of hospitality does not influence them, and could not reasonably be seen to influence them, in discharging their official functions.

## **THE FOLLOWING GENERAL GUIDELINES WILL APPLY IN THE AGENCY**

All offers of hospitality from commercial interests, which have had or might have contractual relations with the Agency, must be reported by the staff member to the Chief Executive.

Routine hospitality, for example a business lunch, is acceptable without clearance. What may be regarded as "routine" for this purpose will depend on a number of factors such as

the value of the hospitality offered, the frequency of offers, whether there is an element of reciprocity and the circumstances in which it is offered (for example whether it is offered by a company to all its customers or is directed at specific customers or potential customers). Certain types of hospitality (for example involving travelling abroad or holiday weekends) should not be regarded as routine and should always be referred to the Chief Executive for direction.

Staff members should not accept offers of hospitality which go beyond the routine practices referred to above, except where acceptance of such an offer can be clearly shown to be in the interest of the Agency and has been approved by the Chief Executive.

### **PAYMENT FOR WORK ON BEHALF OF OUTSIDE BODIES**

Where because of his/her official position, a staff member is invited to carry out work on behalf of an outside body, he/she should notify the Chief Executive.

He/she may not seek or retain payment (other than appropriate travel and subsistence expenses) or other benefit in kind where the proposed activity is part of official duties. Where a payment is made, it should be surrendered to the Chief Executive who will lodge it to the Agency's account.

A staff member may accept a modest payment or benefit in kind if the task, while work related, is not an integral part of his or her official duties and if it is carried on outside of normal working hours.

The question of whether or not a task is an integral part of a staff member's official duties may normally be determined by reference to the relevant work programmes. In case of doubt the staff member should request the Chief Executive to determine if the task is an integral part of official duties.

In cases where no payment or other compensation arises a small token gift may be accepted by a staff member by way of recognition.

## **INTEGRITY**

The principle of integrity demands that each staff member should be open, truthful and honest in all dealings with the Agency and in all business dealings or transactions on behalf of the Agency. There should be no conflict of interest between the work of staff members in the Agency and any outside personal interests. Equally, members of the Agency board are committed to this principle.

A conflict of interest situation arises where a staff member has an interest and where the Agency, whether through that individual staff member or through other staff members, is transacting business with an organisation in which the staff member has an interest. This would apply to all transactions of whatever size or scale and would include the purchase and sale of goods or services by or to the Agency and all aspects of each such transaction.

Staff should not conduct business on behalf of the Agency with any relative or with any business entity with which the staff member or relative is associated, except where such dealings have been fully disclosed to the Agency and specific written approval has been given.

Staff are committed to taking all appropriate steps to prevent fraud including adequate controls to ensure compliance with prescribed procedures in relation to claiming of expenses for business travel.

## **LEGALITY**

It is the Agency's policy to comply with all relevant statutory and regulatory provisions, and at all times to adhere to best business practice in all its operations. Staff members must conduct themselves so as to enable the Agency achieve its objectives in that regard and in particular each staff member should comply with all Health and Safety Regulations and Safety Statements in their day-to-day activities and comply with all internal

regulations and procedures designed to prevent fraud or injury to persons, the property of the Agency, or the interest of the Agency generally.

The Agency will take all necessary steps to ensure that its accounts and reports accurately reflect the business performance and that they are not misleading or designed to be misleading. Equally, we will engage appropriate external expertise to maintain a properly constituted internal audit function.

## **CONFIDENTIALITY**

In the course of employment, information in relation to the Agency becomes available to staff, and some of that information may be confidential to the Agency. Such information should never be used for personal benefit. Confidential information on the Agency or its clients should not be disclosed to third parties.

Staff should respect the confidentiality of information received from those "with whom the Agency does business and should ensure that no improper use of such information is made.

It is the Agency's policy to comply with the requirements of the Data Protection Act.

Nothing in this policy absolves the Agency's staff from responsibility to comply with any relevant legislation.

## **REVIEW**

This code will be reviewed as part of the rolling corporate planning process in the Agency.