

## CODE OF CONDUCT FOR EMPLOYEES OF THE IRISH BLOOD TRANSFUSION SERVICE (“IBTS”)



### INTRODUCTION

The Irish Blood Transfusion Service occupies a significant position in Irish Society and is committed to excellence in customer service and meeting patients’ needs through our professionalism. It is vital therefore that public confidence in the IBTS be maintained. This can be achieved, in part, by ensuring that those who are employed in the IBTS, observe and respect, at all times, the highest ethical standards.

The IBTS shall comply with the Code of Practice for the Governance of State Bodies (2016) and Annex (2020) issued by the Department of Public Expenditure and Reform and in doing so has published this Code of Conduct for Employees. The Code applies to all employees of the IBTS.

It is not possible for the Code to provide for all situations which may arise and employees should bear in mind that it is primarily their responsibility to ensure that all their activities whether covered specifically by this code or otherwise, are governed by the ethical and other considerations implicit in it. It is essential that employees conduct themselves and are seen to conduct themselves and all activities to the highest ethical and professional standards possible.

### OBJECTIVES

The following are the principal objectives of this Code:

- to establish an agreed set of ethical and professional principles;
- to promote and maintain public confidence and trust; and
- to prevent the development or acceptance of unethical or unprofessional practices.

### GENERAL PRINCIPLES

#### INTEGRITY

Employees shall ensure:

- that IBTS resources or time are not used for personal gain or for the benefit of persons/organisations unconnected with the IBTS or its activities.
- Employees must not be involved in outside employment or business interests in conflict or in potential conflict with the IBTS;
- that best business practice is observed in the purchase of goods/services on behalf of the IBTS. In particular, employees must comply with the IBTS Guidelines on Tendering Procedures;

- where relevant to their positions, that the IBTS accounts/reports accurately reflect its performance and are not misleading or designed to be misleading;
- a culture of claiming expenses only as appropriate to business needs and in accordance with good practice in the public sector generally and not fraudulently specifically;
- that information or business secrets are not obtained by improper means; and
- that in matters relating to positions and advancement within the IBTS, that applications are made through normal channels. Employees should not otherwise make, or cause to be made, representations in their favour:

#### IMPARTIALITY

IBTS staff and management are expected to undertake their work activities with impartially and to ensure:

- That IBTS systems and processes are structured and operated to ensure impartiality;
- That departmental activities are not allowed to be compromised by commercial, financial or other pressures;
- That operations, activities and business relationships, including the relationships of the personnel, can be sufficiently monitored to identify threats to impartiality.

( NOTE A relationship that threatens the impartiality of the IBTS can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing (including branding), and payment of a sales commission or other inducement for the referral of new users, etc. However such relationships do not necessarily present the IBTS with a threat to impartiality.)

- That if a threat to impartiality is identified, that every effort is made at individual and group level for the effect to be eliminated or minimized so that the impartiality is not compromised;
- The IBTS shall be able to demonstrate how it would mitigate such threat.

#### GIFTS AND HOSPITALITY AND OTHER ADVANTAGES

- Employees shall avoid giving or receiving corporate gifts, hospitality, preferential treatment or benefits which might affect or appear to affect the ability of the contributor or the recipient to make independent judgement on business transactions.

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- Such gifts, hospitality, treatment or benefits may only be accepted if they are of a reasonably small value.
- With the exception of remuneration payable by the IBTS, employees are prohibited from gaining any advantage in respect of their duties e.g. acceptance of special facilities or discounts on private purchases from non approved suppliers with whom staff members have official dealings.
- Employees shall comply with the IBTS Policy Guidelines on Hospitality.

### INFORMATION

- Employees shall support the IBTS in the provision of access to general information relating to IBTS activities, in a way that is open and enhances its accountability to the general public.
- Employees are under a duty to respect the confidentiality of IBTS activities. The unauthorised release of confidential information directly or indirectly to third parties, including colleagues, the media and staff associations, is strictly prohibited.
- Nothing in the foregoing, shall prevent the disclosure of information in a report made to the Minister for Health by or on behalf of the IBTS or the compliance with Freedom of Information or GDPR legislation.
- Employees shall respect the confidentiality of sensitive information held by the IBTS, including, but not limited to the following:
  - (a) personal information;
  - (b) information received in confidence by the IBTS; and
  - (c) commercially sensitive information.
- Employees must not access information other than that required to perform their normal duties.
- Employees shall observe appropriate prior consultation procedures with third parties, where, exceptionally, it is proposed to release sensitive information, in the public interest.
- Where not explicit in individuals job description or their role, all other employees shall advise and if appropriate obtain the prior approval of the Chief Executive where they seek to:
  - (a) publish any matter relating to the affairs of the IBTS;
 or
  - (b) give interviews, make statements, or otherwise disclose information connected with the services provided by the IBTS; or
  - (c) use or provide information from official IBTS publications.

The prior approval of the National Medical Director shall also be sought in relation to such release of information concerning scientific/medical matters.

This does not preclude the sharing of information with other transfusion services, the giving of presentations at seminars or specialist interest groups or the publication of relevant information in appropriate journals/publications – if in doubt advise as appropriate the Chief Executive or, where relevant, the National Medical Director.

- Employees shall comply with relevant statutory provisions on the release of information (e.g. Freedom of Information and Data Protection legislation).
- Information acquired by an employee during the course of working in the IBTS must not be used for any personal advantage.

### LOYALTY

- Employees shall be loyal to the IBTS and have a duty to conform to the highest ethical and professional standards in the performance of their functions as employees of the IBTS and make every effort to not bring the organization into disrepute.

### OBLIGATIONS

- Employees shall not, unless the approval of the Chief Executive is obtained either during, or for a reasonable period following their engagement as an employee of the IBTS accept positions of employment and/ or engagement that could give rise to a conflict of interest. In this regard, the term “reasonable period” shall not be less than 6 months and may, in any given situation, extend up to 1 year.
- Employees shall not, either during (unless authorised), or following their employment by the IBTS, disclose any business or trade secrets of the IBTS.
- Employees shall ensure that the IBTS fulfils all regulatory and statutory obligations imposed on it. Where an employee is aware of non-compliance with any such obligation, they should immediately bring it to the attention of the person to whom they report. The matter should then be brought to the attention of the Chief Executive.
- In particular, employees shall comply with Freedom of information, Data Protection legislation, the Ethics in Public Office Acts, to the extent that the provisions of these Acts apply to them.
- It is the duty of each employee to familiarise themselves with the contents of the IBTS Privacy Policy and the Social Media Policy, to the extent that they are relevant to the work they do.

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- Employees shall comply with requirements for sanctioning expenditure as laid down in the IBTS Purchasing of Goods & Services Procedures and the IBTS Travel Policy.
- Employees shall also comply with all HR, Finance and IT policies, guidelines and standard operating procedures.
- Employees shall also comply with Environmental, Health and Safety policies, guidelines and standard operation procedures including Safety Statements and Risk Assessments
- Employees shall conform to the highest standards of business ethics.

### FAIRNESS

Employees have a responsibility to ensure that, they and the IBTS:

- comply with employment equality and equal status legislation;
- meet it’s obligations to ensure equality, diversity and inclusion in dealings with all people;
- apply the rules of natural justice
- are committed to fairness in all business dealings; and
- value IBTS customers and donors and, subject only to such reasonable restrictions as may be imposed by the IBTS to ensure the health and safety of all involved with the IBTS, treat all customers and donors fairly and equitably.
- Support the IBTS to meet its obligations set out in the Public Sector Equality and Human Rights Duty.

### WORK/EXTERNAL ENVIRONMENT

It is the duty of all employees to ensure that they and the IBTS:

- place the highest priority on promoting and preserving the health, safety and welfare of employees and colleagues;
- ensure that community concerns are fully considered; and
- endeavour to minimise any detrimental impact of IBTS’ operations on the environment.

Employees who are in contact with the public play a most significant part in determining the public’s attitude towards the IBTS. Employees charged with the task of delivering services to the public must show that they respect the individuals with whom they deal and that they are prepared to ensure that their needs are met insofar as it is legally and economically possible.

Employees should also deal with members of the public with the utmost competence, professionalism, courtesy and impartiality and ensure to not bring the organisation into disrepute. In dealing with the public and effectively performing their duties, employees should unfailingly observe the requirements of competence, professionalism, courtesy, fairness, dignity + respect, inclusion, consideration and promptness.

### RESPONSIBILITY

It is the duty of each employee to familiarise themselves with the contents of this code of conduct. Any queries in relation to this Code should be directed to the HR Department.