

Policy name: Code of Business Conduct / Ethics Policy

Incorporating Procedures:

Procedure for Compliance with Ethics in Public Office Acts

**Approved: 25th November 2016
Revision 1 approved 10th March 2017**

1. Context

The Code of Practice for the Governance of State Bodies makes provision for a Code of Business Conduct for Employees. Under the Code of Practice, the Chairman of the Royal Irish Academy of Music, herein referred to as RIAM, is required each year to confirm to the Minister for Education & Skills that appropriate procedures and controls are in place in the Royal Irish Academy of Music. This includes confirmation that a Code of Business Conduct for Employees is in place and is being adhered to.

2. Purpose

2.1 The purpose of the Code of Business Conduct is to:

- 2.1.1 assist the RIAM in the provision of a professional and effective service to our clients/stakeholders
- 2.1.2 establish an agreed framework of good business practice and ethics in our business conduct
- 2.1.3 promote and maintain confidence and trust
- 2.1.4 prevent the development or acceptance of unethical practices
- 2.1.5 meet our requirements under the Code of Practice for the Governance of State Bodies (2009)

3. Scope

This policy applies to all RIAM employees and all representatives of the RIAM.

4. Benefits

- 4.1 Ensures the RIAM provides professional and effective service for all clients and stakeholders.
- 4.2 Ensures that all RIAM business conduct is ethical and in line with best practice.
- 4.3 Creates an atmosphere of trust in RIAM
- 4.4 Prevents unethical practices.

5. Principles

5.1 All RIAM staff should observe the highest standards of professionalism, integrity and honesty.

6. Policy

6.1 RIAM Code of Business Conduct for Employees

- 6.1.1 The RIAM Code of Business Conduct for Employees sets out in written form the agreed standards of principle and practice which inform the conduct of Employees of the RIAM.
- 6.1.2 Failure to adhere to the requirements of the code and policies and procedures of the RIAM may result in disciplinary action up to and including dismissal.
- 6.1.3 Policies & Procedures underpinning the Code of Business Conduct for Employees Policies and Procedures have been developed across a wide range of areas and can be accessed on the RIAM website, www.riam.ie.
- 6.1.4 The Code of Business Conduct is complementary to each employee's contract of employment and does not affect obligations under the legislation underpinning the employment or other relevant legislation eg. Employment Equality Act 1998 - 2009, Ethics in Public Office Acts, Data Protection Acts 1998 - 2003 etc.
- 6.1.5 Noting of Code of Conduct by Employees
- 6.1.6 Each employee is requested to sign a Declaration of Understanding that they have read and noted the Code of Business Conduct. When signed, the Declaration of Understanding will be held in the Secretariat.

6.2 Professionalism

- 6.2.1 Staff should carry out their duties and responsibilities in the RIAM to a professional and high standard. A professional approach to internal and external clients can be demonstrated through, for example:
 - (i) Responsiveness and Follow-Up
 - (ii) Courtesy and Helpfulness
 - (iii) Good Written Communications
 - (iv) Good Verbal Communications
 - (v) Punctuality
 - (vi) Meeting Etiquette
 - (vii) Good Telephone Manner
 - (viii) Showing a Desire to Get Things Done
 - (ix) Teamwork

(x) Continuous Learning

(xi) Respect for Others

(xii) Professional Dress Code

6.2.2 The RIAM also has in place a Customer Service Charter which sets out our commitments in relation to servicing our clients.

6.3 Integrity

6.3.1 Employees should:

(i) not be involved in outside employment/business interests in conflict or in potential conflict with the business of the RIAM

(ii) not participate in discussions or decisions involving conflicts of interest whether or not such conflicts have previously been disclosed

(iii) avoid giving or receiving corporate gifts, hospitality, preferential treatment or benefits which might affect or appear to affect the ability of the donor or the recipient to make independent judgment on business transactions.

(iv) conduct purchasing activities of goods and/or services in accordance with the RIAM procurement procedures

(v) ensure that the RIAM accounts and reports accurately reflect business performance and are not misleading or designed to be misleading

(vi) avoid the use of the RIAM resources or time for personal gain or for the benefit of persons/organisations unconnected with RIAM or its activities

(vii) not acquire information or business secrets by improper means

(viii) not use any information obtained by virtue of their position for the purpose of any dealing (direct or indirect) in shares, property or otherwise

6.4 Confidentiality

6.4.1 Employees should ensure that they maintain the confidentiality of all information obtained by virtue of their position

6.4.2 Every effort is taken by the Academy to ensure that clients' affairs are treated with absolute confidentiality.

6.4.3 A separate confidentiality policy is available on the RIAM website.

6.5 Provision of Information

6.5.1 Employees should:

(i) support the provision of access to general information relating to the RIAM activities in a way that is open and that enhances its accountability to the general public

(ii) ensure that phone calls, emails and letters received from the media are rerouted through the Public Relations Officer unless they are asked by the Public Relations Officer to deal directly with them

(iii) respect the confidentiality of sensitive information held by the RIAM. Examples of sensitive information are detailed in 6.5.2

(iv) While maintaining confidentiality of sensitive information, members of Senior Management of the RIAM should provide the Chairman and members of the Board of Governors with all relevant information pertaining to the matters on which they may be called upon to make decisions.

(v) observe appropriate prior consultation procedures with third parties where, exceptionally, it is proposed to release sensitive information in the public interest

(vi) comply with relevant statutory provisions relating to access to information (e.g. Data Protection Acts, Freedom of Information Acts)

6.5.2 Sensitive information in the context of the RIAM may include:

(i) policy information provided to the meetings of the Board of Governors for appropriate action/approval

(ii) personal information

(iii) commercially sensitive information (including but not limited to future plans or details of major organisational or other changes such as restructuring)

(iv) this confidentiality of information also applies when the employee has left the service Academy.

6.6 Conflicts of Interest

6.6.1 Employees should:

(i) not participate in any decision where they, or anyone connected with them, may have a personal interest, either directly or indirectly

(ii) not in any way seek to influence the decision, when they have a conflict of interest

(iii) advise the Secretary of the RIAM of the nature of the personal interest if a perceived conflict of interest arises. The Secretary must then approve in writing any further participation by the Employee in the matter concerned

6.7 Work/External Environment

6.7.1 Employees should:

(i) place highest priority on promoting and preserving the health and safety of fellow employees

- (ii) ensure that community concerns are fully considered
- (iii) minimise any detrimental impact of the operations on the environment

6.8 Loyalty

6.8.1 Employees should:

- (i) acknowledge the responsibility to be loyal to the RIAM and to be fully committed in all its business activities while mindful that the organisation itself must at all times take into account the interests of its stakeholders
- (ii) acknowledge the duty of all to conform to highest standards of business ethics

6.9 Fairness

6.9.1 Employees should:

- (i) acknowledge the responsibility to be loyal to the RIAM and to be fully committed in all its business activities while mindful that the organisation itself must at all times take into account the interests of its stakeholders
- (ii) acknowledge the duty of all to conform to highest standards of business ethics

6.10 Compliance with Obligations

6.10.1 Employees should:

- (i) fulfil all regulatory and statutory obligations imposed on the RIAM
- (ii) comply with detailed tendering and purchasing procedures as well as complying with prescribed levels of authority for sanctioning any relevant expenditure
- (iii) ensure that there are adequate controls in place to prevent fraud including controls to ensure compliance with prescribed procedures in relation to claiming of expenses for approved business travel

6.11 Responsibility

6.11.1 Management will

- (i) circulate this Code of Business Conduct to all employees of the RIAM
- (ii) provide guidance and direction on the policies and procedures within which staff are required to operate.

6.11.2 Employees should:

- (i) familiarise themselves with these policies and procedures and refer to them as necessary when carrying out their duties

(ii) seek guidance on clarification from the Secretary where necessary

6.12 Declaration of Understanding

6.12.1 Each staff member should sign the Declaration of Understanding included as an addendum to this policy document.

7. Procedures

7.1 Procedure for Compliance with Ethics in Public Office Acts

7.1.1 Managers and staff in designated positions (Director, Secretary & Registrar) should:

(i) complete a statement of interests each year detailing any interests which could materially influence the employee in the performance of his/her functions.

(ii) If during the year there is a change in the interests of the individual who is covered by the Ethics legislation, the individual is required to furnish a statement of change in writing to the Secretary of the RIAM.

(iii) In the case of the Secretary the statement should be furnished to the Registrar

8. Responsibility

8.1 The Secretary of RIAM is responsible for overseeing this policy and its operational procedures.

9. Legislation and Regulation

9.1 The Code of Practice for the Governance of State Bodies

9.2 Ethics in Public Office Acts

9.3 Qualifications and Quality Assurance (Education and Training) Act 2012

9.4 [National Framework of Qualifications \(NFQ\)](#)

10. Related Documents

10.1 RIAM Strategy 2020

10.2 Trinity Ethics Policy

11. Document Control

Approved:

Approved by Board of Studies November 25th 2016.

Revision 1 approved by Board of Studies March 10th 2017.

Next review:

Academic year 2019/20

12. Addendum:

Declaration of Understanding

Code of Business Conduct

Each staff member should sign the following:

"I have read and understood the policies and procedures of the Royal Irish Academy of Music and agree to adhere to same."

Signed: _____

Date: _____

Please insert your name in block capitals below

Name: _____

NB: It is important that this Declaration of Understanding is signed and returned as early as possible to the Secretary's Office.