

Policy name: Code of Business Conduct for Employees

Approved: 25th November 2016

Revision 1 approved 10th March 2017

Revision 2 approved 7th March 2019

Revision 3 approved by Trinity Academic Council 13th May 2020

1. Context

- 1.1 The Code of Practice for the Governance of State Bodies 2016 makes provision for a Code of Conduct for the Board and Employees. Under this Code of Practice, the Chair of the Board of Governors of the Royal Irish Academy of Music, hereinafter referred to as the Academy, is required each year to confirm to the Minister for Education & Skills that appropriate procedures and controls are in place in the Academy. This includes confirmation that a Code of Conduct for the Board and Employees is in place and is being adhered to.
- 1.2 The Academy makes provision for a Code of Conduct for Board Members within its Code of Governance Manual, approved by the Board and reviewed by it on a regular basis. Members of the staff or anybody contracted by the Academy subscribe to an identified Code of Business Conduct for Employees, which is set out in the sections which follow.

2. Purpose

- 2.1 The purpose of the Code of Business Conduct for Employees (the 'Code') is to satisfy the Academy's obligations under the Code of Practice for the Governance of State Bodies 2016 and the relevant provisions of the Ethics in Public Office Act, 1995 and Standards in Public Office Act, 2001, by ensuring that all staff members observe the highest standards of professionalism, integrity and honesty.

3. Scope

- 3.1 This Code applies to all persons employed by the Academy.

4. Benefits

- 4.1 This Code ensures that the Academy provides a professional and ethical service for the benefit of all students and stakeholders, in accordance with current best practice, and prevents the development or acceptance of unethical practices.

5. Principles

- 5.1 To establish an agreed framework of good business practice and ethics in its business conduct, so assisting the Academy in the provision of a professional and ethical service to its students and stakeholders across the full range of its educational and business activities and thereby promoting and maintaining confidence and trust.

6. Policy

- 6.1 General Provisions

- 6.1.1 The Code sets out in written form the agreed standards of principle and practice which inform the conduct of the Academy's employees.
- 6.1.2 This Code establishes the ethical principles which all employees agree to abide by.
- 6.1.3 This Code promotes and strives to maintain confidence and trust.
- 6.1.4 This Code seeks to prevent the development or acceptance of unethical practices.
- 6.1.5 Failure by employees to adhere to the requirements of the Code and policies and procedures of the Academy may result in disciplinary action up to and including dismissal.
- 6.1.6 Policies and procedures underpinning the Code have been developed across a wide range of areas and may be accessed on the Academy's website, www.riam.ie.
- 6.1.7 The Code 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 Acts 1998 - 2015, Ethics in Public Office Acts, General Data Protection Regulation (GDPR) 2018 etc.
- 6.1.8 Each employee is required to sign a Declaration of Understanding (see the Addendum following Section 9) that they have read and noted the Code. When signed, the Declaration of Understanding will be held in the Academy Secretariat.

6.2 Professionalism

- 6.2.1 Employees should carry out their duties and responsibilities in the Academy to a high professional standard. A professional approach to internal and external stakeholders 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 Academy also has in place a Stakeholder Service Plan which sets out its commitments in relation to servicing its stakeholders.

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 Academy;
- (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 Academy procurement procedures;
- (v) ensure that the Academy accounts and reports accurately reflect business performance and are not misleading or designed to be misleading;
- (vi) avoid the use of the Academy resources or time for personal gain or for the benefit of persons/organisations unconnected with the Academy 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 stakeholders' affairs are treated with absolute confidentiality.

6.5 Provision of Information

6.5.1 Employees should:

- (i) support the provision of access to general information relating to the Academy's 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 Academy. Examples of sensitive information are detailed in 6.5.2;

- (iv) while maintaining confidentiality of sensitive information, members of Senior Management of the Academy should provide the Chairperson 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 Academy 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 of the 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 Academy Secretary of the nature of the personal interest if a perceived conflict of interest arises. The Academy 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 and fairness

6.8.1 Employees should:

- (i) acknowledge the responsibility to demonstrate loyalty towards the Academy 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 Compliance with Obligations

6.9.1 Employees should:

- (i) fulfil all regulatory and statutory obligations imposed on the Academy;
- (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.

6.9.2 Managers and staff in designated positions (Director, Secretary and Administrative Officer (Registry)) 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 Academy Secretary;
- (iii) in the case of the Academy Secretary the statement should be furnished to the Administrative Officer (Registry).

6.10 Responsibility

6.10.1 The Academy Secretary will

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

6.10.2 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 Academy Secretary where necessary.

7. Responsibility

7.1 The Academy Secretary is responsible for overseeing this policy and its operational procedures.

8. Legislation and Regulation

- 8.1 [The Code of Practice for the Governance of State Bodies 2016.](#)
- 8.2 [Qualifications and Quality Assurance \(Education and Training\) Act 2012.](#)
- 8.3 [National Framework of Qualifications \(NFQ\).](#)

9. Document Control

Approved by Board of Studies 25th November 2016.
Revision 1 approved by Board of Studies 10th March 2017.
Revision 2 approved 7th March 2019.
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Next review: Academic year 2020/21.

Addendum

Declaration of Understanding

Code of Business Conduct for Employees

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.