

CODE OF CONDUCT

FOR BOARD MEMBERS AND STAFF OF THE WESTERN DEVELOPMENT COMMISSION

Introduction

A Code of Conduct has to be prepared on a collaborative basis, involving members of the Board, Management Team and staff of Western Development Commission (WDC), for approval and adoption by the Board of WDC, taking into account the implications of The Code of Practice for the Governance of State Bodies (2016), the Ethics in Public Office Act 1995 and 2001, the WDC Act 1998 and the current human resource policies of the WDC.

The WDC was established in 1997 on a non-statutory basis by the Irish Government. It became a statutory body on February 1st, 1999, following the enactment of the Western Development Commission Act 1998 by the Houses of the Oireachtas. The WDC's role is defined in this Act. Its main functions under the Act are:

- To promote, foster and encourage the economic and social development in the Western Region (counties of Donegal, Leitrim, Sligo, Mayo, Roscommon, Galway and Clare).
- To establish, manage and control the Western Investment Fund, a €32 million fund to be invested on a commercial basis in projects in the Western Region.

Given this remit, we work to the best of our abilities, based on our knowledge and experience, to support the implementation of our Strategic Plan and fulfill our mission and objectives.

Intent and scope

This Code sets out the ethical principles which Members of the Board, Advisory Committees, Management and Staff of WDC have agreed and confirmed through existing Human Resource and Organisational policies, procedures and practices. Where necessary, it is supplemented with additional policies and procedures to fulfill the requirements of the Code of Ethics for State Bodies.

Objectives

The Code of Conduct adopted by WDC seeks to

- *Outline the agreed set of ethical principles that will govern our behaviour;*
- *Promote and maintain confidence and trust; and prevent the development or acceptance of unethical practices.*

WDC Principles

1. Integrity

The WDC is committed to carrying out our responsibilities ethically and honestly as Members of the Board, Management and Staff of WDC. In so doing, we will manage and operate the business of Western Development Commission with the utmost integrity.

We confirm the commitment to the disclosure by Members of the Board, of outside employment/business interests which may be in conflict or in potential conflict with the objectives and activities of WDC:

- It is recommended that the acceptance of further employment where the potential of conflict of interest arises should be restricted during a reasonable period of time after the exercise of a function in the State body has ceased.
- The WDC proactively requires its advisory Committee members/Board members (who are not staff of the WDC but provide advice based on their scientific experience and expertise) to make an annual declaration of interest for the purposes of the Ethics in Public Office Acts. (**Section 17 Ethics in Public Office Act 1995 and 2001**).
- The disclosure of any potential conflict of interest is a standing item on the agenda of every committee meeting and each member is asked to confirm that they have no conflict of interest with matters under discussion.
- The WDC Act 1998 18(1) states that a person shall not disclose confidential information obtained by him or her while performing duties as a member or member of the staff of, or an adviser or consultant to the commission unless he or she is duly authorised by the Commission to do so.
- We accept and agree that management and employees should not be involved in outside employment/ interests in conflict or in potential conflict with the objectives and activities of Western Development Commission.

The WDC is committed to ensuring that:

- Resources or time are not used for personal gain, or for the benefit of persons/organisations unconnected with Western Development Commission or its activities;
- Does not acquire information or business secrets by improper means;
- Financial accounts and reports accurately reflect performance and are not misleading or designed to be misleading;

- Corporate gifts, hospitality, preferential treatment or benefits are not offered or accepted, which might affect or appear to affect the ability of either the donor or the recipient to make independent judgement that bears on the activities of WDC. See Gifts & Hospitality Policy.
- The conduct of purchasing goods/services is in accordance with best practice;
- Ensures a culture of claiming expenses only as appropriate to business needs and in accordance with good practice in the public sector generally.

2. Information

- Board Members, Advisory Committees, management and employees of the WDC support the provision of access to general information relating to the WDC's activities in a way that is open and that enhances the accountability of the WDC to the general public.
- We respect the confidentiality of sensitive information held by the WDC. This would constitute material such as:
 - Personal information;
 - Information received in confidence by the WDC, and
 - Any potentially sensitive information (including but not limited to future plans or details of major organisational or other changes such as restructuring).
- We observe appropriate prior consultation procedures with third parties where, exceptionally, it may be proposed to release sensitive information in the public interest. See Freedom of Information - Sections 16 and 15 Reference Manual – available from WDC Office.
- We confirm that we comply with relevant statutory provisions, including data protection legislation and the provisions of the Freedom of Information Act.

3. Obligations

- We accept and seek to fulfil all regulatory and statutory obligations imposed on WDC. Our tendering and purchasing procedures are designed to achieve and uphold compliance as well as meeting prescribed levels of authority, as amended from time to time, for sanctioning any relevant expenditure.
- We are committed to putting in place and maintaining controls to prevent fraud, including adequate controls to ensure compliance with prescribed procedures in relation to claiming of expenses for business travel.
- All Board Members, Advisory Committees and employees are required to co-operate with internal audit in the internal audit process.

- Members of the Board are committed to making use of their reasonable endeavours to attend all Board meetings.
- Conform with procedures laid down by the Board in relation to conflict of interest situations, including in regard to acceptance of positions following employment and /or engagement by a State body that may give rise to the potential for conflicts of interest and to confidentiality concerns.
- The terms and conditions of employment of staff, the engagement of outside consultants and contractors and the appointment of Members of the WDC, all necessitate the enforcement and monitoring of procedures in relation to respecting and maintaining confidentiality. Notwithstanding the significant openness and informality about communication which we share and value within WDC, we recognise the need to monitor and safeguard confidence and trust in all our information-sharing and contacts, whether internal or external in nature.

3. Loyalty

- Members of the Board, Advisory Committees, Management and Staff of the WDC acknowledge the responsibility to be loyal to the WDC and fully committed to all its activities. We are mindful of the fact that the organisation itself must at all times take into account that it is a State funded Commission with a clear and unique role defined by statute.
- We acknowledge the duty on the part of all to conform to the highest standards of work ethics.

4. Fairness

- We strive at all times to be in compliance with employment equality and equal status legislation.
- We are committed to fairness in all dealings and we value all our customers and treat all customers equally.

5. Work/External Environment

- The WDC places the highest priority on promoting and preserving the health and safety of all those who work with us and those visiting our premises.
- The WDC promotes the development of a culture of '*speaking up*' whereby workers can raise concerns regarding serious wrongdoing in the workplace without fear or reprisal.

- The WDC strives to ensure community concerns are fully considered and acknowledged and we will continue working to minimise any detrimental impact which the operations of the WDC may have on the environment. In that regard, we also recognise our responsibility as citizens and as working people to continually develop our awareness of the need to protect our environment for the benefit of future generations.

7. Responsibility

- This Code of Conduct is to be circulated to and retained by all Board Members, Advisory Committees, management and employees. It should be read alongside the existing and circulated policy document on disclosure of interests.
- Board Members, Advisory Committees, management and employees are asked to acknowledge receipt and understanding of these documents.
- Board Members, Advisory Committees, management and employees are similarly asked to acknowledge receipt and understanding of the WDC's guidelines on receipt of gifts and on other ethical considerations which arise routinely.
- Prepare an explanatory booklet providing practical guidance and direction on such areas as gifts and entertainment and on other ethical considerations which arise routinely.

8. Review

- The WDC is committed, at least every three years, to review and update this Code of Conduct as appropriate.

Code of Conduct for Members and Staff of WDC

I have read and understand the terms of the agreed Code of Conduct for Members and Staff of WDC, a copy of which I will retain.

I acknowledge my responsibility to uphold this Code of Conduct and to abide by the guidelines issued to me in relation to disclosure of interests and receipt of gifts as such may arise in my role in WDC.

Signed: _____
Board Member/Staff

Date: _____