



Iascach Intíre Éireann  
Inland Fisheries Ireland

# Code of Business Conduct for Employees

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# Code of Business Conduct for Employees

## 1. Introduction

All employees of Inland Fisheries Ireland (IFI) are required, as a condition of employment, to ensure that they have read and comply with the Code of Business Conduct for Employees (the 'Code'). This Code does not affect obligations under the legislation underpinning employment or other relevant legislation e.g. Equality Act, Ethics in Public Office acts, Data Protection legislation etc.

It is essential that IFI maintains the ethical business practices our stakeholders have learned to expect.

Please read the Code and think about how it applies to you. It is imperative that we all strive to live up to the contents of this code in our day-to-day work.

## 2. Purpose of the Code

The purpose of this Code is to set down the general principles and standards which govern the professional activities and conduct of management and employees, including permanent, contract and agency workers of IFI.

IFI is widely regarded throughout the communities in which it operates for its honesty, fairness and business integrity, all of which are vital to the overall success of the organisation. To maintain this high regard, it is incumbent on all employees to conduct themselves in a manner that does not adversely reflect on themselves nor IFI.

A formal Code of Business Conduct provides guidance to employees in recognising and resolving the ethical and legal issues they encounter in conducting the organisation's business. It is also a requirement for all State Bodies to have such a Code.

IFI aspires to be honest and ethical in all its operations and to adhere to the highest accepted standards of corporate governance in all its financial and management practices.

Every employee is responsible for their own personal conduct and while this Code provides guidance and standards on the type of business conduct required by IFI, common sense and good judgment should be applied to all situations.

This Code forms part of each employee's terms and conditions of employment with IFI. This Code will be updated when necessary to continually reflect and clarify our practices. Failure to adhere to the Code, or breaches of it, may be subject to disciplinary action up to and including dismissal. Any queries regarding business conduct should be directed to the employee's Line Manager or appropriate Senior Manager.

### **3. Principles of the Code**

The Code is based on the following principles that are the foundation of IFI's objectives and outlines the practices to be adhered to by all employees:

- Integrity and Fairness
- Loyalty
- Legality
- Confidentiality and the Protection of Personal Data
- Value for money

#### **3.1 Integrity and Fairness**

The principle of integrity is that each employee should be open, truthful, and honest in all of their dealings with and on behalf of IFI.

It is IFI policy to behave fairly and honestly. No employee should engage in manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other intentional unfair-dealing practice.

IFI values and treats all employees, customers, suppliers, and stakeholders equally and staff are at all times committed to fairness in their transactions with stakeholders. All employees are therefore required to uphold IFI's values on fairness in their dealings both internal and external to the organisation. IFI's policies on [Equal Opportunity and Diversity](#) and [Dignity at work](#) are intended to reflect the organisation's commitment to the proactive management of equality issues in a respectful and non-discriminatory manner and meet our requirements under legislation.

In line with the organisation's policy and procedure on the Disposal of Fixed Assets, employees and connected parties are precluded from purchasing assets of the organisation, either directly or indirectly.

### *Conflicts of Interest*

A conflict of interest arises when a person participates in a decision about a matter which may benefit or *be seen to* benefit that person because of their direct or indirect monetary, financial or personal interest affected by or involved in that matter. This refers to a reasonably perceived, potential, or actual conflict of interest.

IFI operates under strict corporate governance standards and on this basis there should be no conflict of interest between the work of the employee and any outside interest. This would apply to all transactions irrespective of size or scale and would include the purchase and sale of goods or services by or to IFI and all aspects of each such transaction.

A conflict may arise where an employee publicly lobbies for IFI, in favour of himself or others, without authorisation. Any staff member who is involved with any outside organisation, whether economic, social, cultural or political has the responsibility to ensure that such involvement is not prejudicial to the interests of IFI. There must be no conflict of interest or perceived conflict between a staff member's responsibilities to IFI and their involvement in any employment (including self-employment) outside of their role with IFI.

Employees must also consider any interest of an immediate family member or close personal relationship insofar as it could create a conflict or perceived conflict of interest with their employment.

An employee becoming aware of such a conflict or perceived conflict must declare this to their Line Manager/ Senior Manager immediately and action must be taken to remove this conflict. IFI recognises that determining whether a conflict of interest exist or not can be difficult – we would encourage you to review the [FAQs at Appendix 1 so that you know the correct procedure to follow.](#)

### *Work outside the Organisation*

It is not appropriate for an employee to perform other outside duties during working time or on IFI premises. In the event that an employee is involved in an outside activity/ business (whether remunerated or otherwise), there shall be no conflict of interest that would impact on the employee's attendance, performance or support of colleagues, in all matters relating to IFI's activities. Employees are also not permitted to use equipment, telephones, materials, resources or proprietary information for work other than that of IFI.

Under the Organisation of Working Time Act, 1997, employees cannot 'double-job' if the aggregate hours worked exceeds the 48-hour per week average. Employees must notify IFI, in writing, if they work additional hours for another employer. An employee must at all times ensure that any secondary work/volunteering performed does not result in non-compliance with Section 33 of the Organisation of Working Time Act 1997. This legislation imposes an average maximum working week of 48 hours over a particular reference period. The maximum working week applies to the aggregate working time of all hours worked by an employee regardless of whether they work in one or more employments.

### *Gifts and Hospitality*

Under no circumstances may a staff member solicit, either directly or indirectly, gifts, hospitality, entertainment etc for personal use, gain or benefit.

The offer of any unsolicited gifts, including hospitality, travel, payments, services, entertainment or benefits-in-kind on a scale which could affect, or be considered to

affect, the ability of the staff member to exercise independent judgment on IFI matters, must be declined and notified to their Senior Manager and recorded on the [IFI Gifts and Hospitality Register](#). IFI is required to keep a record of gifts and hospitality received by staff and Board members where the value exceeds €25.00. Isolated gifts of token value such as pens, diaries, etc. can be considered to be insignificant and may be accepted if, in doing so, no obligation is imposed on either the employee or IFI. The same principles of integrity should be applied to gifts an IFI employee is considering offering to a customer.

### **3.2 Loyalty**

Implied in each employment relationship with the Fisheries Service is the requirement that all employees are loyal and committed to the organisation. Employees are expected to be supportive of one another and co-operate with and respect the rights and roles of their colleagues.

### **3.3 Legality**

It is the policy of the IFI to comply with all relevant statutory and regulatory requirements governing its operations. It is IFI's policy, at all times, to adhere to best business practice. To ensure this policy is complied with all employees are required to:

- **Legislative Responsibilities**

Comply with and enforce all Fisheries legislation and EU regulations and the laws of the land as it pertains to their role.

- **Health & Safety**

Comply with all health & safety regulations and [IFI's Safety Statement](#) in their day to day activities.

- **Financial Records and Tendering**

Comply with all rules, regulations and guidelines in relation to competitive tendering for the procurement of goods or services. It is IFI policy to comply with all applicable laws that require its books and records to reflect accurately the true nature of the transactions represented. No false, artificial, or misleading

entries shall be made in relation to IFI's books or records by anyone or at anyone's direction, for any reason. This also applies to recording hours worked and submitting subsistence/ expense claims There shall be no intentional omission of liabilities from IFI's books and records for any reason. Employees must comply with all internal regulations and procedures designed to prevent fraud or injury to persons or the property of the IFI, or the interest of the service generally. It is IFI policy to ensure, at a minimum, to operate a three-quote process (of purchases over €250) based on all needs in determining the pricing and other contractual terms offered to suppliers or other prospective suppliers etc.

- **Environmental**

Comply with all applicable legislative provisions and requirements in respect of the potential impact on the environment of IFI activities. Employees must comply with all relevant requirements as outlined in IFI's Environmental Charter, Environmental Assessment Process (EAP) and associated Standard Operating Procedures (SOPs) in addition to all relevant external guidance and regulations.

- **Copyright infringement & Software Piracy**

It is IFI policy to respect copyrights owned by others and to use copyrighted materials only as allowed by law or agreement.

- **Freedom of Information (FOI)**

Comply with all aspects of the [Freedom of Information Act 2014](#) in responding to and reporting on FOI requests received by IFI.

- **Access to Information on the Environment (AIE)**

Comply with all aspects of the European Communities ([Access to Information on the Environment](#)) Regulations 2007 (S.I. 133 of 2007), in responding to and reporting on AIE requests received by IFI.

- **Ethics in Public Office**

Each employee who holds an office designated (*restricted to Heads of Function only*) under the [Ethics in Public Office Acts, 1995 and 2001](#) must comply with the provisions of the Acts and in particular make the appropriate disclosure of interest provided for in that Act to IFI.

- **Equal Opportunity**



Comply with all relevant employment legislation, and all internal policies and procedures in place to ensure compliance of such legislation. IFI is committed to its policy of equal treatment for all employees and prospective employees.

- **Sexual and Other Workplace Harassment**

Sexual and other workplace harassment in any form will not be tolerated. The work culture must be free from discrimination and harassment based on age, race, religion, gender, disability, sexual orientation, civil or family status and membership of the travelling community. Any employee who feels that he or she has been subjected to sexual or other workplace harassment is required to report the incident immediately by following the complaints procedure in the [IFI Dignity at Work Policy](#).

- **Workplace Behaviour**

It is IFI policy to promote a safe environment for its employees and to behave responsibly towards the health, safety and welfare of its employees, customers, stakeholders and the environment. See [IFI's Employee Safety Handbook](#).

### **3.4 Confidentiality and the Protection of Personal Data**

Every employee is required to maintain confidentiality surrounding all information, which they obtain in the course of their employment, relating to the business of IFI.

Employees shall not disclose or appropriate to their own use, or to the use of any third party, at any time during or subsequent to their employment with IFI, any confidential information of IFI whether or not developed by the employee.

Employees who are responsible for maintaining personal information on IFI's employees must ensure that the information is not disclosed inappropriately or misused. Strict adherence to all IFI policies relating to compliance with the Data Protection legislation is mandatory at all times. As an employee of IFI, you are required to familiarise yourself with [IFI's Data Protection policies and procedures](#).

### **3.5 Value for Money**

IFI is committed to working in an efficient and effective manner, and to providing real value for money to the taxpayer. IFI adheres to the [Public Spending Code](#).

## **4. Other Operating Principles**

### **4.1 Reporting of Wrongdoing and Whistleblowing**

[IFI's Protected Disclosures \(Whistleblowing\) Policy](#) sets out IFI's policy and procedure for current (and former) IFI workers to report concerns in relation to any specific knowledge, or any properly grounded suspicions, that they may have that:

- a) an offence under the Inland Fisheries Act of 2010 as amended, or any other enactment has been or is being committed
- b) any provision of this Act or any enactment or rule of law has been or is being contravened, or
- b) where there has been other serious wrongdoing in relation to IFI.

### **4.2 Use of Inland Fisheries Ireland's Assets**

In the performance of an employee's duties, public resources must be applied prudently and only for the purpose for which they are intended. Use of IFI's assets, including computers and related information technology assets, must comply with established IFI policies. Inappropriate or unauthorised use of any IFI asset is a violation of this Code.

### **4.3 Use of ICT**

IFI is increasingly reliant upon the use of ICT systems to carry out its business. To ensure that integrity is maintained, it is your responsibility to make sure that your use of any system is authorised and proper in line with the [IFI ICT Policy](#).

### **4.4. Inadvertent Disclosure**

The unintentional disclosure of proprietary information can be just as harmful as intentional disclosure. To avoid unintentional disclosure, never discuss or share information that has not been made public by IFI, with any unauthorised person.

### **4.5 Speaking Out**

When you are speaking out as a private individual on public issues other than on fisheries business, it is inappropriate to give the appearance that you are speaking or acting on behalf of IFI. This includes activity on social media platforms.

Relevant reports or statements to the media on fisheries issues may only be made with the approval of the CEO or their nominee.

#### **4.6 Media Relations**

In order to ensure professional and consistent handling, employees should refer all requests from the media to the Head of Business Development.

#### **4.7 Participation in Political Life**

IFI will not make contributions or payments to political parties or candidates. In this regard, your work time is the equivalent of such a contribution. Therefore, you will not be paid by the IFI for any time spent running for public office, serving as an elected official or campaigning for a political candidate.

#### **4.8 Professional Dress Code**

All staff are expected to maintain acceptable standards of neat and appropriate dress and footwear and where required, to wear IFI branded workwear or protective clothing. The application of the dress code will comply with Health and Safety standards at all times.

#### **4.9 Illegal Substances**

IFI operates rigorous policies in relation to alcohol and substance misuse and the application of appropriate corrective action. Employees are encouraged to familiarise themselves with the [IFI Intoxicant at Work Policy](#).

## **Status of this Code**

This Code supersedes any/ all previous Codes of Conduct for Employees. IFI shall review this Code of Business Conduct periodically.

As it is not possible for this Code of Business Conduct for Employees to provide for every situation which may arise, staff must bear in mind that it is primarily their personal responsibility to ensure that all their activities, whether covered specifically or otherwise in this Code, are governed by the professional and ethical considerations implicit in the Code.

## 5. Appendix 1 – FAQs Conflicts of Interest

Please contact **Board Secretariat and Compliance Manager, Emma Fortune** for any questions or concerns that you may have in relation to recognising a potential conflict of interest.

### What is a conflict of interest?

The basic definition of a conflict of interest refers to a situation where outside financial interests or other personal considerations may compromise or have the appearance to compromise an employee's actions or judgements in the administration, management, or performance of their professional activities.

### Can you give me some examples of how this might affect me?

Here are some examples of instances in which you could be perceived as conflicted:

- You are awarding a contract for services to a person who is related to you or with whom you have a relationship.
- You are recruiting a temporary/permanent member of staff who is related to you or with whom you have a relationship.
- You are involved in a decision impacting an angling tourism business which is run by someone who is related to you or with whom you have a relationship.
- You plan and take annual leave for the purpose of transacting a private angling related business during peak operational times.
- You hold a position on the executive of an angling club/organisation and are involved in making a decision within IFI that has the potential to impact that organisation.
- You are a member of an angling club, and when attending club meetings as a member, you do not declare when you speak or act, that you do so in a private capacity. [Wearing work wear to such private events is strongly discouraged].
- You have worked with a product supplier/service provider who is successful in tendering with the organisation repeatedly where a relationship has been built over time and could become or is perceived to be a conflict of interest.
- You express a personal opinion in relation to a fisheries matter in conflict with IFI policy (due to the forum it is expressed in e.g. social media).

- You are a staff nominated member on the Board of IFI and are involved in making a decision that affects you personally.
- You are a member of a 'regional' tender/grant evaluation panel deciding on a project local to you.
- You are a senior member of staff and are asked to provide a reference to an individual who is applying to become a member of the Board, this endorsement would be deemed to be either a perceived or an actual conflict of interest.

### **What do I do if I find myself in a situation similar to one of the above?**

As soon as you realise that you may be conflicted you must take necessary action and make a declaration of this circumstance, either to your line manager or a senior manager, whichever is more relevant. [Members of the Senior Leadership Team must report instances to the Governance Officer, Emma Fortune for recording purposes – due their level of responsibility/budget level]

### **Declaration in Writing**

In making a declaration, it is always best to document the occurrence (by email or otherwise), the process you are involved in and the perceived or actual conflict arising. You will also confirm that you are removing yourself from the process/activity.

### **Late Realisation**

#### In meetings

You may realise that you are conflicted at the outset of or during a meeting, in that case, declare your conflict to the Chairperson. Ensure that you are not part of any discussion or decision making related to the matter on which you are conflicted. This must be noted as part of the meeting record.

#### Following Decisions

If you discover, following a decision, that you were conflicted or could be perceived to be, you should declare this conflict and the decision-making process will be repeated without your input.

### **What could happen to me if this situation arises?**

Throughout our lives we develop both personal and working relationships. Declaring a perceived or actual interest protects both you and the organisation from any

question of inappropriate influence over decision making and the use of publicly funded resources. **There is no sanction for reporting a conflict of interest.**

**Our priority is to assure our stakeholders [the Minister, the Department, the business community and the taxpayer] that IFI decisions are made fairly and transparently.**