



Digital Hub Development Agency

**Code of Business Conduct for Employees
in accordance with section 2 of the
Code of Practice for the Governance of State Bodies**

Code of Business Conduct for Employees

Digital Hub Development Agency has developed this Code of Business Conduct for management and staff as required under paragraph 2.1 of the Code of Practice for the Governance of State Bodies. The Code of Practice requires that this code was prepared via a participative approach, and should be approved by the Board taking into account the implications of the Ethics of Public Office Acts, 1995. A copy of the Code will be available upon request and be placed on The Digital Hub website.

Appendix B to the Code of Practice sets out a suggested framework for the Code of Business Conduct and this framework has been utilised in drawing up this Code.

Nature, intent and scope of application

The purpose of the Code is to provide guidance to the employees of Digital Hub Development Agency in performing their duties, as set down in the Digital Hub Development Agency Act 2003.

The Code also sets down other requirements provided for under other legislation and best current practice.

Objectives

The objectives of the Code are:

- to set out an agreed set of ethical principles
- to promote and maintain confidence and trust in the management and employees of Digital Hub Development Agency
- to prevent the development or acceptance of unethical practices
- to promote the highest legal, management and ethical standards in all the activities of Digital Hub Development Agency and
- to promote compliance with best current management practice in all the activities of Digital Hub Development Agency.

General Principles

Integrity

- a) Management and employees in designated positions are required to comply with the Ethics in Public Office Acts 1995 and 2001 and to disclose outside employment/business interests which they consider may be in conflict or in potential conflict with the business of Digital Hub Development Agency.
- b) Management and employees must not be involved in outside employment/business interests which may be in conflict or potential conflict with the business of Digital Hub Development Agency.
- c) Management and employees will 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 judgement on business transactions.
- d) Management and employees must be committed to having Digital Hub Development Agency compete vigorously and energetically but also ethically and honestly.
- e) Digital Hub Development Agency is committed to conducting its purchasing activities in accordance with public policy and best business practice and its purchasing regulations reflect this commitment.
- f) Digital Hub Development Agency is committed to ensuring that its accounts and reports accurately reflect its business performance and are not misleading or designed to be misleading.
- g) Management and employees are required to avoid the use of Digital Hub Development Agency resources or time for personal gain, for the benefit of persons/organisations unconnected with Digital Hub Development Agency or its activities, or for the benefit of competitors.
- h) Digital Hub Development Agency is committed not to acquire information or business secrets by improper means.

Information

- a) Digital Hub Development Agency is committed to providing access to general information relating to its activities in a way that is open and that enhances the accountability of Digital Hub Development Agency to the general public.
- b) Management and employees are required to respect the confidentiality of sensitive information held by Digital Hub Development Agency. This will constitute material such as
 - commercially sensitive information (including, but not limited to, future plans or details of major organisational or other changes such as restructuring)

- personal information and
 - information received in confidence by Digital Hub Development Agency
- c) Digital Hub Development Agency will observe appropriate prior consultation procedures with third parties where, exceptionally, it is proposed to release sensitive information in the public interest.
- d) Digital Hub Development Agency will comply with all relevant statutory provisions (e.g. data protection legislation, Freedom of Information Acts).
- e) Management and employees will observe the strictest confidentiality in relation to all discussions and decisions taken at meetings of Digital Hub Development Agency.

Obligations

- a) Digital Hub Development Agency will fulfil all regulatory and statutory obligations imposed on it including those imposed by the Digital Hub Development Agency Bill, 2002
- b) Digital Hub Development Agency will comply with detailed tendering and purchasing procedures as well as prescribed levels of authority for sanctioning any relevant expenditure.
- c) Digital Hub Development Agency has implemented controls to identify and prevent, as far as possible, fraud and to ensure compliance with prescribed procedures in relation to claiming of employee travel related expenses.
- d) Employees are required to use their reasonable endeavours to attend all Digital Hub Development Agency meetings.
- e) It is acknowledged that the acceptance of positions following employment and/or engagement by a State body can give rise to the potential for conflicts of interest and to confidentiality concerns. Digital Hub Development Agency will consider any cases in which such conflicts of interest or confidentiality concerns may arise and will take appropriate steps to deal with such matters in an effective manner. Digital Hub Development Agency will also ensure that any procedures that it may put in place in this regard are monitored and enforced.

Loyalty

- a) The Agency and employees of Digital Hub Development Agency acknowledge the responsibility to be loyal to Digital Hub Development Agency and to be fully committed to all its activities while mindful that Digital Hub Development Agency must at all times take into account the interests of its clients and funders including tax payers
- b) The Agency and employees of Digital Hub Development Agency acknowledge the duty of all to conform to the highest standards of business ethics.

Fairness

- a) Digital Hub Development Agency is committed to complying with employment equality and equal status legislation
- b) Digital Hub Development Agency is committed to the values of equal opportunities and diversity within the workplace, as well as zero tolerance of any bullying or harassment behaviours
- c) Digital Hub Development Agency is committed to fairness in all its business dealings
- d) Digital Hub Development Agency is committed to complying with D/Finance Circular No. 1/92 (PC 171) – *"Procedures for dealing with grievance and disciplinary problems and will be referenced in employee contracts"*.
- e) Digital Hub Development Agency is committed to complying with D/Finance Circular (3/00) – *"Policy on Harassment and Bullying"*.
- f) Digital Hub Development Agency values its suppliers, clients and customers and treats all its suppliers, clients and customers fairly

Work/External Environment

- a) The Board and management of Digital Hub Development Agency place the highest priority on promoting and preserving the health and safety of its employees.
- b) Digital Hub Development Agency will ensure that community concerns are fully considered in its activities and operations.
- c) Digital Hub Development Agency will minimise any detrimental impact of its operations on the environment

Responsibility

- a) Digital Hub Development Agency will circulate this Code of Business Conduct and policy document on the disclosure of interest to all management and employees for their retention.
- b) Digital Hub Development Agency will ensure that all members of the Authority and employees receive a copy of the appropriate Code and understand its contents.
- c) Digital Hub Development Agency will provide practical guidance and direction as required on such areas as gifts and entertainment and on any other ethical considerations which may arise.

Review

- a) Digital Hub Development Agency will review this Code as appropriate.
- b) Any revisions to this Code must be considered and approved at a Meeting of the Board of Digital Hub Development Agency