

Léargas Code of Conduct

March 2023



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Introduction

This document contains the Code of Conduct for all Board members and employees of Léargas. The Code takes into account the implications of the *Ethics in Public Office Act, 1995 to 2001*. In addition, Board members and staff are required to comply with the requirements of the Companies Act 2014.

Léargas is a registered charity and a limited company, we meet all statutory obligations, and we comply fully with the Charities Code of Practice, in addition, this document references the Code of Practice for State Bodies, which Léargas strives to comply with to the extent that it is relevant and proportionate to our operations. This policy was renewed and approved by the Léargas Board on 23 March 2023.

Purpose

The purpose of the Léargas Code of Conduct is to:

- establish an agreed set of conduct and ethical principles.
- promote and maintain professional confidence and trust.
- ensure that all staff are aware of and familiar with and adhere to this code of conduct and its associated procedures.
- prevent the development or acceptance of unethical practices.

General Principles

The Léargas Code of Conduct is based on the principles of Trust, Information Management & Transparency, Governance, Diversity, Equity & Inclusion and Sustainability. These principles are described in more detail below.

Trust

Trust means:

- behaving with mutual respect and trust for each other and those with whom we work.
- provision by Board members or staff, full disclosure of outside work or business interests in actual or potential conflict with the business of Léargas.
- purchasing activities or goods/services in accordance with best business practices.
- ensuring that accounts and reports accurately reflect performance and are not misleading.
- not giving or receiving gifts, hospitality, preferential treatment or benefits which could affect, or appear to affect the ability to make independent judgement on work-related matters.
- not using Léargas resources or time for personal gain, for the benefit of persons or organisations unconnected with Léargas or its activities or for the benefit of competitors.
- always behaving with integrity and honesty.
- ensuring a culture of claiming expenses only as appropriate to business needs and in accordance with good practice in the public sector generally.
- promoting the development of a culture of “speaking up” whereby Léargas staff members can raise concerns regarding serious wrongdoings in the workplace without fear of reprisal.

Information Management and Transparency

Information management and Transparency means:

- providing information relating to Léargas activities in a transparent way that ensures accountability to the public.
- ensuring information is acquired through the proper means.
- respecting the confidentiality of information such as:
 - commercially sensitive information (including but not limited to, plans or details of major organisational or other changes).

- personal information.
- information received in confidence.
- instigating appropriate prior consultation procedures with third parties where, exceptionally, sensitive information is to be released in the public interest.
- complying with the relevant statutory provisions such as GDPR, Protected Disclosures and Freedom of Information legislation.

Commitment to Good Governance

For Léargas Board members and staff, good governance means:

- fulfilling all regulatory and statutory obligations.
- acceptance of the duty to conform to the highest standards of business ethics.
- being fully committed to Léargas in all its activities while always taking the interests of the owner(s) into account.
- holding ourselves accountable in discharging our professional responsibilities.
- ensuring our work delivers value for money in the use and disbursement of public funds.
- introducing controls to prevent fraud.
- co-operating with internal auditors during internal audits.
- complying with:
 - detailed tendering and purchasing procedures.
 - prescribed levels of authority for sanctioning any relevant expenditure.
 - prescribed procedures for claiming business travel expenses.

For Board members, commitment to good governance also means making a reasonable endeavour to attend all Board meetings.

Diversity, Equity & Inclusion

This means that Léargas will;

- comply with employment equality and equal status legislation.
- demonstrate a commitment to balance by ensuring that the voices of our beneficiaries and stakeholders are heard and reflected in our work.
- value and treat all clients, stakeholders and staff equally.
- ensure that decisions respect the principle of equality.
- be an equal opportunities employer.
- accept and embrace difference.

Sustainability

Commitment to sustainability within Léargas means:

- placing the highest priority on promoting and preserving the health and safety of Léargas staff, Board members and clients.
- minimising any detrimental impact of Léargas operations on the environment.
- demonstrating a commitment to the sustainable development agenda.
- promoting social sustainability by ensuring that community perspective and priorities are taken into consideration.
- promoting economic sustainability through a commitment to dealing with ethical suppliers and demanding high ethical standards from project beneficiary organisations.

Conflicts of Interest

Under the *Ethics in Public Office Act, 1995 to 2001*, members of the Board and members of staff in Designated Positions are required to provide to the Secretary of the Board a written statement of any interests they—or to their knowledge, their spouses, civil partner or children—have, which could influence the Board member’s decisions in such a way as to benefit the member, their spouse, partner or children.

Board will establish and enforce procedures to avoid conflicts of interest and confidentiality concerns where Board members take up positions of employment following their role as Board members of Léargas.

Additionally, in the event that during an official function or meeting such an issue in which a Board member has a material interest should arise, the Board member is required to furnish a statement of interest. The Board member will absent themselves when the Board is deliberating on the matter of interest and a note of this is made in the meeting minutes. The Board will determine whether it is appropriate to keep a separate record of the discussions on such a matter to which the member absenting themselves would not have access on a case-by-case basis.

If the member has some doubt about whether such a conflict exists, they should consult with the Chairperson.

If the Chairperson identifies a conflict of interest, they should absent themselves from the meeting and they will appoint the deputy chairperson to chair the meeting.

Disclosures of interest outlined above will be kept by the Secretary of the Board in a special confidential register.

Embedding the Code

It is the responsibility of the Léargas Board to circulate to all Léargas Board members and staff and will do so by providing:

- this Code of Conduct
- a policy document on the disclosure of interests (see Léargas Code of Practice for Board Members)
- an explanatory guide providing practical guidance on any ethical issues which the Board considers pertinent to the proper functioning of Léargas. (see Léargas Code of Practice for Board Members)

It is the responsibility of all Léargas Board members and staff members to acknowledge that they have received the documents listed above and seek clarification where necessary.

Review

The Léargas Board will review this Code of Conduct at intervals and update to Staff and Board as appropriate.

Confirmation of Receipt of the Code of Conduct

I confirm having received a copy of the Code of Conduct of **Léargas - The Exchange Bureau**, and relevant companion documents - the contents of which have been read and understood by me.

Print Name : _____ Signature : _____

Date : _____