



## Code of Conduct

Version	5
Date Approved	22 February 2022
Date of Previous Approval	30 July 2019 31 March 2017 8 December 2015 4 February 2014
Date of next Review	February 2024

Date of Review	Amendments
June 2019	Updated to reflect current sponsorship body, organizational structure and associated policies and procedures and reflect advice provide by the Equality and Good Relations service provider.
February 2022	Updated to reflect current Data Protection Act (2018) and include reference to General Data Protection Regulations (GDPR)

You may also be interested in the following policies:

Dignity at Work  
 Equality, Diversity and Inclusion Policy  
 Finance Procedures and policies  
 Fraud Prevention Policy and Fraud Response Plan  
 Internal Complaints procedure  
 Unacceptable Behaviour from Members of the Public  
 Whistleblowing Policy and Guidance

## **1. Introduction**

- 1.1. This policy sets out guidance in relation to a Code of Conduct for staff of the Commission for Victims and Survivors for Northern Ireland.
- 1.2. This Code of Conduct forms part of the terms and conditions of service applicable to all staff, breaches of which may be the subject of disciplinary action.

## **2. Duties and Responsibilities**

- 2.1. All staff should familiarise themselves with the contents of the Code and act in accordance with the principles set out in it.
- 2.2. All staff have a duty;
  - (i) To discharge public functions reasonably and according to the law.
  - (ii) To recognise ethical standards governing particular professions, details of which can be obtained from the relevant professional bodies themselves.
  - (iii) To be honest and impartial in the exercise of their duties.
  - (iv) To not take part in any political or public activity which compromises, or might be seen to compromise, their impartial service to the Commission.
- 2.3. The Commission's Accounting Officer has overall responsibility for propriety in a broad sense, including conduct and discipline.

## **3. Accountability**

- 3.1. Staff should be aware;
  - (i) Of their accountability to the Commission
  - (ii) Of all relevant policies and procedures which set out accountability, whether financial or otherwise
  - (iii) Of the respective roles of the Commission's sponsor body The Executive Office (TEO), and the Commission as set out in Legislation and the Management Statement & Financial Memorandum
  - (iv) That the Accounting Officer for the Commission is ultimately accountable to TEO for its independence, effectiveness and efficiency.

- 3.2. Staff should conduct themselves with integrity, impartiality and honesty. They should not deceive or knowingly mislead the Commissioners, colleagues, the sponsor body or the public.

## **4. Conflicts of Interest**

- 4.1. Staff should abide by the rules adopted by the Commission in relation to private interest and possible conflict with public duty, the disclosure of official information and political activities. They should not misuse their official position or information acquired in their official duties to further their private interests or those of others.
- 4.2. Key members of staff, such as the Chief Executive, Managers and staff managing or working on contracts, should ensure that any possible conflicts of interest are identified at an early stage and that appropriate action is taken to resolve them.

## **5. Integrity**

- 5.1. Staff should not use their official position to receive, agree to accept or attempt to obtain any payment or other consideration for doing, or not doing, anything or showing favour, or disfavour, to any person. They should not receive benefits of any kind from a third party, which might reasonably be seen to compromise their personal judgement and integrity.
- 5.2. Under the Prevention of Corruption Act 1916, staff may be required to prove that the receipt of payment or other consideration from someone seeking to obtain a contract is not corrupt.
- 5.3. Staff should not accept gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity.
- 5.4. Staff should refer to the policy on Acceptance of Gifts and Hospitality for full details.

## **6. Relations with the Public**

- 6.1. Staff who deal with members of the public should do so empathetically, efficiently, promptly with the resources available and without bias or maladministration.
- 6.2. Staff should offer the public the highest standards of conduct and service.
- 6.3. Staff should present themselves in a manner that reflects well upon the Commission.
- 6.4. Staff should refer to the policy on Handling Unacceptable Behaviour from Members of the Public for full details.
- 6.5. The Commission will take all reasonable steps to provide a safe working environment and protect staff from abuse.

## **7. Use of Resources**

- 7.1. Staff should endeavour to ensure the proper, economical, effective and efficient use of resources.

- 7.2. Staff should refer to the Commission's Finance Procedures and policies or seek further guidance from the Head of Finance and Corporate Affairs.

## 8. The Commission and Staff Policies

- 8.1. Staff should endeavour to ensure compliance to all Policies that exist within the Commission.

## 9. Attending Work-Related Social Functions

- 9.1. It is important that every member of staff is aware that inappropriate behaviour both within the workplace and at other venues during work-related social events can lead to complaints from staff of harassment or bullying.
- 9.2. **Work related events are considered under the law to be a continuation of the workplace** and that harassment or bullying which occurs at social events, such as Christmas parties, or in the pub after work, can constitute unlawful discrimination in the same way as if the harassment or bullying had occurred in the workplace.
- 9.3. Harassment can range from jokes/remarks/questions of a sexual or sectarian nature, to unwanted physical contact. It is essential that all staff behave in a manner that is in keeping with our equal opportunities policy by ensuring that their behaviour is beyond reproach at all times and could not cause offence to another member of staff. It should be emphasised that **it is the impact of the inappropriate behaviour on the recipient, not the intention of the alleged offender that is significant.**
- 9.4. Complaints from members of staff about acts of harassment or bullying may be formally investigated under the Dignity at Work Policy. In those cases where a complaint is upheld, consideration will be given to appropriate disciplinary action against the harasser. In serious cases, this could lead to dismissal. An individual could also find him/herself named in an employment tribunal application or in court proceedings and be personally liable to pay compensation. Serious incidents of harassment may also be subject to a police investigation.

## 10. Confidentiality

- 10.1. It is one of the Commission's aims to be as open as possible with information on its activities. However, disclosure of information not already in the public domain to outside individuals or organisations should be made through the mechanisms put in place for handling requests made under the Freedom of Information Act 2000.
- 10.2. Staff should be aware of their obligations under the Data Protection Act 2018, General Data Protection Regulation and the Officer of the Commissioner's Policies on Management of Information.

10.3. Guidance on the Freedom of Information Act 2000, UK General Data Protection Regulation (UKGDPR) and the Data Protection Act 2018 can be obtained internally. Alternatively, guidance on the relevant legislation is available from the Information Commissioner's Office ([www.ico.gov.uk](http://www.ico.gov.uk)).

## **11. Staff Concerns about Improper Conduct**

11.1. If any member of staff believes that they are being required to act in a way which;

- (i) Is illegal, improper or unethical
- (ii) Is in breach of a professional code
- (iii) May involve possible maladministration, fraud or misuse of public funds
- (iv) Is otherwise inconsistent with this Code

11.2. They should raise the matter in accordance with the Commission's Internal Complaints procedure. Staff can also refer to the Commissions Fraud and Whistleblowing Policies for further information and sources of guidance.

11.3. Staff should also draw attention through the complaints procedure to cases where;

- (i) They believe there is evidence of irregular or improper behaviour elsewhere in the organisation, but where they have not been personally involved;
- (ii) There is evidence of criminal or unlawful activity by others; or
- (iii) They are required to act in a way which, for them, raises a fundamental issue of conscience.

## **12. After Leaving Employment**

12.1. Staff should continue to observe their duty of confidentiality set out in section 11 after they have left the employment of the Commission.

## **13. Breaches of the Commission for Victims and Survivors Code of Conduct**

13.1. Any breach of this Code of Conduct will be appropriately investigated and may lead to disciplinary action, in accordance with the Commissions Disciplinary procedures.

## **14. Variation**

14.1. The Commission reserves the right to vary this Policy as it deems appropriate to include compliance with any legal requirements.

