

# **CODE OF BUSINESS CONDUCT FOR BOARD MEMBERS, AND STAFF OF THE NATIONAL TREATMENT PURCHASE FUND**

## **1. INTENT AND SCOPE**

This code contains the basic rules and policies governing the business practice of the National Treatment Purchase Fund (NTPF). It underscores the commitment of the Board and employees to the highest standards of business conduct and has been prepared to assist Board members and employees in understanding their duties, rights and obligations as persons connected with the NTPF. The code is binding and requires that each member of the Board and staff are familiar with it. The standard of service which the NTPF provides relies heavily on the commitment and contribution of each individual staff member.

## **2. OBJECTIVES**

The main objectives of the Code are to:

- Establish a set of ethical principles for all Board members and employees;
- Promote and maintain confidence and trust in the NTPF;
- Prevent the development, continuance or acceptance of unethical practices;

This code is not intended to restrict or restrain staff unduly in their tasks, it should rather be viewed as assisting them in understanding the nature of their responsibilities and in avoiding any difficulties which might arise for them. It sets out the basic principles of integrity, confidentiality, professionalism, loyalty and lawfulness/compliance required for members and employees of the Board.

## **3. INTEGRITY**

The Board is totally committed to the concept of integrity in all its dealings. It follows that members and employees conduct themselves and are seen to conduct all activities to the highest possible standard.

It includes the following –

- a) Disclosure by Board members of outside business interests in conflict or potential conflict with the business of the NTPF;
- b) Avoidance by employees of outside business interests in conflict with the business of the NTPF and disclosure should it occur;
- c) Drawing only official remuneration in respect of official activities; refraining from 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) Commitment to act in the best interests of the Board in dealings with external agencies, but also ethically and honestly;
- e) Purchasing goods/services in accordance with best business practice whilst satisfying current EU and national procurement rules;
- f) Ensuring that the Boards reports/accounts accurately reflect their business performance and are not misleading or designed to be misleading;
- g) Avoidance of use of the State body's resources or time for personal gain, for the benefit of persons/organizations unconnected with the body or its activities or for the benefit of competitors;
- h) Commitment not to acquire information or business secrets by improper means.

Members of the Board are required to file a declaration of interests with the NTPF Board Secretary and to ensure that this declaration is updated as necessary.

#### **4. CONFIDENTIALITY**

Confidentiality means respecting and protecting the privacy of the NTPF's affairs and activities. It includes –

- a) Compliance with the relevant statutory provisions (e.g. data protection legislation, the Freedom of Information Acts 1997 and 2001);
- b) Non-disclosure of any sensitive information held by the NTPF in confidence;
- c) Safeguarding sensitive information held by the Board in confidence;
- d) Observing appropriate consultation procedures with third parties where, exceptionally, it is proposed to release sensitive information in the public interest;
- e) Seeking approval from the Chief Executive prior to publishing information to the media and also seeking approval from the Chief Executive for all lectures, letters or books relating to or potentially relating to the affairs of the NTPF;
- f) These obligations do not cease when Board Membership or employment in the NTPF has ended;

- g) Directors should not retain documentation obtained during their terms as Director and should return such documentation to the NTPF Board Secretary or otherwise indicate to the secretary that all such documentation in their possession has been disposed of in an appropriate manner;

#### **4.   LAWFULNESS**

The following is included -

- a) Fulfilling all regulatory and statutory obligations imposed on the Board;
- b) Complying with tendering and purchasing procedures as well as complying with prescribed levels of authority for sanctioning any relevant expenditure;
- c) Complying with all controls in place to prevent fraud and meeting with prescribed procedures in relation to claiming of expenses for business travel;
- d) Ensuring in so far as possible that any business venture or transaction which is at variance with legal or regulatory requirements or which might be associated or regarded as supportive of illegal or criminal activities is not entered on behalf of the NTPF;
- e) Adhering to the highest form of business ethics;

#### **6.   LOYALTY**

Loyalty means being faithful to the NTPF and its client's and includes:

- a) Protecting the good name of the NTPF;
- b) Being fully committed in all the NTPF's business activities;

#### **7.   FAIRNESS**

Fairness means commitment of the Board and clients to ensure –

- a) Compliance with employment equality and equal status legislation;
- b) Commitment to fairness in all business dealings;
- c) Treating all patients equally;

**8. WORK/EXTERNAL ENVIRONMENT**

The NTPF is committed to promoting and preserving health and safety to all and in so doing ensuring that public concerns are considered and acknowledged in our activities.

**9. REVIEWS**

The policy will be reviewed annually by the NTPF unless significant issues arise in the interim period or a change in national policies influences same.

**DECLARATION**

I have read and understand the terms of the agreed Code of Business Conduct for Board Members and Staff of the NTPF, 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.

Signed:\_\_\_\_\_

Date:\_\_\_\_\_