

CODE OF CONDUCT FOR BOARD MEMBERS AND EMPLOYEES

CONTROL

This policy is a controlled document and must not be amended in any way without the permission of the Secretary to the Board (Corporate Services Director) or CEO. Any authorised changes should be recorded in the amendment/revision history below.

Amendments and Revisions

| Review Date | Document Owner | Version No. | Amendments & Revisions | Author | Authorised By | Next Review |
|--------------------|-----------------------|--------------------|-----------------------------------|---|----------------------|--------------------|
| 23 April 2018 | NTPF Board | 1 | New policy | Audit, Quality Assurance and Research Director (Secretary to the Board) | NTPF Board | |
| 27 June 2022 | NTPF Board | | Policy Review | Corporate Services Director (Secretary to the Board) | | Q1 2024 |
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1. Introduction

This Code of Business Conduct for directors and staff members was prepared in compliance with the updated Code of Practice for the Governance of State Bodies 2016. The Code is also aligned to the Companies Act 2014 and the requirements of the Ethics in Public Office Acts, 1995 and 2001. All those who hold designated directorships (Board Members) or occupy designated positions of employment in public bodies, prescribed by regulation for the purposes of the Ethics legislation (i.e. the Ethics in Public Office Acts 1995 and 2001), must comply with the relevant provisions of the legislation. Compliance with the Ethics Acts is deemed to be a condition of appointment or employment.

The National Treatment Purchase Fund ("the NTPF") is dedicated to performing its functions to the highest standards of business conduct. This Code has been created to inform Members of the Board and staff members of their duties, rights and obligations in relation to the NTPF. The Code is mandatory and as such requires compliance by each Member of the Board and each staff member. It is necessary that Members and staff become familiar with this document as the performance and standards of the service provided by the NTPF will be determined by the dedication and contribution of each individual Member or staff member.

The Code of Conduct is a description of the procedures which determine the conduct and behaviour of staff members. The Code of Conduct outlines the principles of integrity, obligations, loyalty, fairness, responsibility and confidentiality in respect of all of the NTPF's business.

2. Objectives

The main objectives of the Code of Conduct are as follows:

- the establishment of appropriate ethical principles for all Members and staff members;
- the promotion and maintenance of confidence and trust in the NTPF;
- the prevention of the development or acceptance of unethical practices; and
- ensuring that the NTPF's business is conducted in such a manner that the integrity of the NTPF is reflected in the service provided to the public.

The NTPF values its staff and is committed to ensuring that each individual has a working environment which reflects that individual's right to be treated with dignity and respect. The NTPF in turn expects staff to behave in a manner both professionally and personally which reflects positively on the NTPF. The NTPF will not accept discrimination of any kind including sex, marital status, family status, age, sexual orientation, disability, race, creed or membership of the travelling community. The NTPF will not accept bullying or harassment of any kind in the workplace. All individuals associated with the NTPF must avoid any conduct in the work place which amounts to racial, religious, sexual discrimination or harassment of any kind whatsoever.

It is acknowledged that it is not possible to have a set of rules which will provide for all possible situations which may arise. Members and staff are expected to ensure that all of their activities are governed by ethical standards reflected in this Code.

3. Integrity

The NTPF is committed to performing its functions with integrity. Integrity entails moral probity and honesty in exercising sound judgement. It is essential that Members and staff of the NTPF conduct themselves and are seen to conduct themselves and all of their activities to the highest possible standard.

This includes:

- Disclosure by Members of outside employment/business interests in conflict or in potential conflict with the business of the NTPF;
- Avoidance by staff members of outside employment business interests in conflict or potential conflict with the business of the NTPF;
- Avoidance of the giving or receiving of corporate gifts, hospitality, preferential treatment or benefits which may affect or appear to affect the ability of the donor or the recipient to make independent judgements on business transactions;
- Commitment to carry out the NTPF's functions vigorously and energetically but also ethically and honestly;
- Commitment to the purchasing of goods and services in accordance with best business practice;
- Ensuring that the NTPF's Annual Report and Accounts accurately reflect its business performance and are not misleading or designed to be misleading;
- Avoidance of the use of the NTPF's resources or time for personal gain for the benefit of the persons or organisations unconnected with the NTPF or its activities or for the benefit of competitors;
- Maintaining the confidentiality of any restricted or confidential information and not using such information for personal gain or abuse of one's position in any way;
- Drawing only official remuneration in respect of official activities;
- Ensuring a culture of claiming expenses only as appropriate to business needs and in accordance with good practice in the public sector generally;
- Commitment to act in the best interests of the NTPF in all dealings with other organisations;
- Commitment, not to acquire information or business secrets by improper means.

Members of the Board are required to declare potential interests under monthly meeting agenda item, for the register of interests maintained by the Board Secretary and annually under the Standards in Public Office Declaration of Disclosure Forms again to the Board Secretary.

4. Information/Confidentiality

The NTPF is dedicated to maintaining, respecting and protecting the privacy of the NTPF's activities. This includes:

- Support by Members and staff of the NTPF for the provision of access by the NTPF to general information relating to its activities in a manner which is open and which enhances its accountability to the general public;
- Commitment not to acquire information or business secrets by improper means;
- Respecting the confidentiality of sensitive information held by the NTPF which would include such material as;
 - a) commercially sensitive information (including, but not limited to, future plans or details of major organisational or other changes such as restructuring);
 - b) personal information; and
 - c) information received in confidence by the NTPF
- Observe appropriate consultation procedures with third parties where, exceptionally, it is proposed to release sensitive information in the public interest and;
- Comply with relevant statutory provisions (e.g. Freedom of Information legislation, Data Protection legislation, etc.).

5. Obligations

The NTPF is dedicated to fulfilling its obligations under all requisite legislation which includes:

- Fulfilling all regulatory and statutory obligations relevant to the NTPF;
- Compliance with detailed tendering and purchasing procedures as well as complying with prescribed levels of authority for sanctioning any relevant expenditure;
- Introduction of necessary controls to prevent fraud including adequate controls to ensure compliance with prescribed procedures in relation to claiming for expenses for business travel;
- Compliance and cooperation with internal audit whilst completing the internal audit process;
- Aspiration of all Board members to attend all meetings;
- Conformity with procedures laid down by the NTPF in relation to conflict of interest situations, including in regard to acceptance of positions following employment and/or engagement by the NTPF bearing in mind potential conflicts of interest and confidentiality concerns;
- Acknowledgement of the duty of all to conform to highest standards of business ethics.

6. Mission and Values of the NTPF

The mission of the NTPF is to empower public health providers and funders, and add value by delivering;

- Independent assurance and verification of waiting list information and processes, concerning patient treatment, and;
- Specialist price negotiation and purchase initiative support when sourcing health services. This work will be underpinned by the following values:

Excellence

We are committed to delivering services of the highest quality which are innovative and integrated in nature, while taking real pride in the services we deliver.

Partnership, Integrity and Respect

We will at all times endeavor to work in partnership with our key stakeholders, including patients, staff, Government and health care providers in a spirit of consultation, collaboration and integrity within a culture of mutual respect to add value to the public health system;

Independence, Accountability and Responsibility

Through consistent strong leadership we will ensure that we maintain our independence as a statutory agency and that we are appropriately accountable and responsible for the decisions that we make.

7. Loyalty

The NTPF is dedicated to carrying out its functions. Loyalty to the NTPF and its activities includes:

- The responsibility to be loyal to the NTPF and fully committed in all its business activities while mindful that the organisation itself must at all times take into account the interests of the stakeholder;
- Protecting the good name and reputation of the NTPF; and
- Acknowledging the duties of all to conform to the highest standards of business ethics.

8. Fairness

The NTPF is dedicated to applying principles of fairness in all of its dealing which includes:

- Compliance with employment equality and equal status legislation;
- A commitment to fairness in all business dealings; and
- Valuing its clients/customers and treating all equally.

9. Work/External Environment

The NTPF is dedicated to:

- Promoting the development of a culture of 'speaking up' (NTPF policy on protected disclosures) whereby workers can raise concerns regarding serious wrongdoing in the workplace without fear of reprisal;
- Placing the highest priority on promoting and preserving the health and safety of staff members; and
- Ensuring that community concerns are fully considered;
- Whilst minimising any detrimental impact of the operations on the environment.

10. Responsibility

The NTPF is responsible for:

- Circulation of this Code of Business Conduct and a policy document on disclosure of interests to all Members and staff members for their attention;
- Acknowledgment of receipt and understanding of same; and
- Provision of guidance and direction on such areas as gifts and entertainment and on other ethical considerations which arise routinely.