



UNIVERSITY OF
LIMERICK
OLLSCOIL LUIMNIGH

CODE OF CONDUCT FOR EMPLOYEES

1. Introduction

1.1 Purpose

The University of Limerick has developed this Code of Conduct for Employees in order to provide guidance to its employees in performing their duties in an ethical and professional manner and in compliance with the policies and procedures of the University of Limerick and relevant legislation including the Universities Act, 1997. A copy of this Code will be circulated to all employees and it will also be available on the University's website.

1.2 Scope

1.2.1 *To whom does the Code apply?*

For the purposes of this Code, employees are defined as all individuals in the paid employment of the University, full and part time, including those in receipt of stipends.

1.2.2 *In what situations does the Code apply?*

The University of Limerick values integrity, honesty and fairness and strives to integrate these values into its teaching, research and business practices. The University requires employees to adhere to this Code in the performance of their daily duties. This Code and the Code of Conduct for Members of the Governing Authority will aid the University in promoting its reputation and commitment to ethical behaviour.

1.2.3 *Who is responsible for ensuring that the Code (and any associated procedure) is implemented and monitored?*

The Director, Human Resources will ensure that this Code of Conduct is circulated to all employees for their understanding and retention. Employees are required to familiarise themselves with the contents of this Code and must act in accordance with its provisions.

Practical guidance and direction as required by employees in such areas as gifts and entertainment and on other ethical considerations which may arise from time to time, should in the first instance be sought from the employee's line manager and thereafter the Head of Unit responsible for the development of the Policy to which the query relates.

2. Context

2.1 Legal and Regulatory Context

2.1.1 *The Universities Act 1997*

The Universities Act 1997 is the primary piece of legislation governing universities. Where required, this Code of Conduct addresses relevant provisions of the Act.

2.1.2 *Ethics in Public Office Act 1995 and Standards in Public Office Act 2001*

These laws primarily require members of Governing Authority and employees occupying designated positions of employment to disclose and appropriately manage their conduct in relation to interests which might influence the way they (or others) conduct themselves in areas of public life.

2.2 Other Context

2.2.1 *Policy Approach*

The Governing Authority of the University of Limerick fully subscribes to the “Code of Governance of Irish Universities - 2019”, (HEA/IUA). This Code of Conduct is developed taking account of the provisions of the 2019 HEA/IUA Code for the Governance of Irish Universities.

Employees of the University are expected to be conversant with this Code of Conduct and the requirements of University policies and procedures governing their conduct and work practices. The Human Resources Division will provide training to support the implementation of this Code. The Human Resources Division will also provide a copy of this Code to each employee of the University and will endeavor to promote, disseminate and provide the required training to enable employees to implement the provisions of this Code.

2.2.2 *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 employees of the University of Limerick;
- To prevent the development or acceptance of unethical practices;
- To promote the highest legal, management and ethical standards in all the activities of the University of Limerick;
- To promote compliance with best current governance and management practice in all the activities of the University of Limerick.

These objectives can be achieved through, inter alia, adherence by all employees to the fundamental principles set out in this Code.

3. Statements

3.1 Principles for Employee Code of Conduct

3.1.1 *The requirements of the Code*

In the performance of their duties, employees should endeavour to maintain high standards in service delivery, observe appropriate behaviour and maintain the highest standards of probity. Employees, through their actions, shall not bring the University of Limerick into disrepute.

3.1.2 *Integrity*

- a. Employees are required to disclose to their line manager outside employment and/or personal business interests they have which they consider may be in conflict, either actual, potential or perceived, with the business of the University of Limerick. For the purposes of this Code of Conduct, all references to conflict of interest are deemed to cover actual, potential or perceived conflicts of interest.

All employees are required to familiarise themselves with the University's Policy for Conflicts of Interest and operate in accordance with the Policy in declaring any actual, potential or perceived conflict of interest of which they become aware.

- b. Employees will not engage in any outside employment/business or activity in conflict with the interests of the University of Limerick.
- c. Employees will avoid giving or receiving gifts, corporate hospitality, preferential treatment or benefits, which might affect or appear to affect the ability of the donor or the recipient to make an independent judgement on business transactions. Employees must report any gifts received with a value in excess of €20 to their line manager, who will maintain a gift register for their direct reports.
- d. Employees must be committed to having the University of Limerick compete vigorously and energetically but also ethically and honestly with other educational institutions, commercial and other providers of research and advisory services.
- e. Employees will be committed to conducting the purchasing activities of goods/ services in accordance with public policy, best business practice and the University's procurement policies and procedures.
- f. Employees will be committed to ensuring that the engagement of consultancy and other services is in compliance with public policy guidelines.

- g. Employees will be committed to ensuring a culture of claiming expenses only as appropriate to official needs and in accordance with good practice in the public sector.
- h. Employees will be committed to ensuring that the accounts/reports of their area of responsibility within the University accurately reflect the operating performance of the University and are not misleading or designed to be misleading.
- i. Employees are required to avoid the unapproved use of the University of Limerick's resources or time for personal gain, for the benefit of persons/organisations unconnected with the institution or its activities or for the benefit of competitors.
- j. Employees should not acquire information or business secrets by improper means.

3.1.3 Duty of Care

Employees will act responsibly and fairly with the due care, diligence, loyalty and the prudence of a reasonable individual whose duty of care is to the University of Limerick.

3.1.4 Conduct as Employees

- a. Employees will treat each other and all members of the campus community with courtesy and respect.
- b. Employees will use the resources of the University in a proper, effective and efficient manner and will take proper and reasonable care of the University's property and will not knowingly use, or permit its use, for unauthorised purposes.
- c. Employees will be familiar with the University's policies and procedures and comply with these accordingly.
- d. Employees are required to attend work, perform their duties in a diligent and efficient manner and not absent themselves from duty without proper authorisation.
- e. Employees will ensure that expenses such as travel and subsistence payments are not unnecessarily incurred either by themselves or by staff reporting to them.

3.1.5 Confidentiality/Use of Information

- a. Employees will respect and take due care to maintain the confidentiality of information received in the performance of their duties as employees. This includes respecting the confidentiality of the deliberations of the University at

individual, group and Board/Committee levels. Obligations relating to confidentiality do not cease when a contract of employment ends.

- b. Employees will ensure that appropriate care is taken to guarantee the security of sensitive information (in paper or electronic form) whether on or off Campus and will ensure that confidential records are subject to appropriate access control procedures.
- c. Employees are required to comply with relevant University policies and procedures on the use or dissemination of information including, but not limited to, the University's Data Protection Policy, Records Management Policy, IT Security Policy and Acceptable Usage Policy. Employees will be cognisant of their responsibilities and will comply with all relevant statutory provisions of the EU General Data Protection Regulation (GDPR), the Freedom of Information Act (FOI) 2014 and the Data Protection Acts 1988 – 2018.
- d. Employees of the University will respect the confidentiality of sensitive information held by the University of Limerick. This constitutes material such as and in particular:
 - Personal information;
 - Information received in confidence by the University;
 - Any commercially sensitive information or other information sensitive to the reputation of the University.
- e. In an exceptional circumstance where it is proposed to release sensitive information in the public interest, employees will observe appropriate prior consultation with their line manager and, where required, with relevant third parties.
- f. Employees will be committed to providing access to general information relating to activities of the University in a way that is open and transparent and enhances the University's accountability to the general public.

3.1.6 Conflicts of Interest

It is acknowledged that the acceptance of positions following employment and/or engagement by the University can give rise to the potential for conflicts of interest and to confidentiality concerns. Where the Governing Authority of the University of Limerick become aware of cases in which such conflicts of interest or confidentiality concerns may arise during a reasonable period following employment by the University, it will take appropriate steps to deal with such matters in an effective manner in consultation with the Director, Human Resources.

3.1.7 Consultancy Services by Former Employees

Former employees will not provide consultancy services to the University unless such services are confirmed by the Director, Human Resources as being in compliance with Public Sector regulatory requirements. It is a matter for each line manager to ensure adherence to this provision and to engage with the Director, Human Resources as required and prior to the engagement of the consultancy services.

3.1.8 Loyalty

Employees have a responsibility to be loyal to the University of Limerick and to be committed to its activities with due regard to the tenets of academic freedom, while mindful that the University of Limerick itself must at all times take into account the interests of its students and providers of funds including taxpayers.

3.1.9 Fairness

This Code of Conduct places an onus on employees to ensure compliance with employment equality and equal status legislation, commitment to fairness in all business dealings, and the valuing and equal treatment of all students, suppliers, employees, and customers.

4. Related Procedures for Code of Conduct for Employees

4.1 Gifts and Hospitality

- a. All actions of employees in carrying out their official duties will be above suspicion and not give rise to any actual or potential conflict of interest, and their dealings with commercial and other interests will bear the closest possible scrutiny.
- b. The receipt of gifts and hospitality by employees from external individuals or organisations and from those with whom they have official dealings, will be governed by the highest standards. For the purposes of these provisions, the term “gift” includes any benefit which is given to an employee free of charge or at less than its commercial price.
- c. The exchange of official gifts (e.g. gifts exchanged with dignitaries and officials) to and from the University is acceptable and in such circumstances, gifts received remain the property of the University. Receipt of business-related hospitality that constitutes normal courtesies in business and community relations (e.g. attendance at a community/ civic/ cultural function)

is acceptable. Employees may only accept personal gifts of a reasonable value. As previously stated, employees must report any gifts received with a value in excess of €20 to their line manager, who will maintain a gift register for their direct reports. (A prize is not considered a gift).

- d. Employees will not accept cash, gift cheques or any vouchers that may be exchanged for cash regardless of the amount from external individuals or organisations.
- e. Employees will not solicit gifts or hospitality for personal gain.
- f. Employees will adhere to the University of Limerick Official Entertainment Policy.

4.2 Acquiring Goods and Services

- a. Employees will conduct purchasing activities of goods and services in accordance with University procurement policies and procedures, public policy and best business practice.
- b. Employees will not solicit contracts with the University of Limerick for the supply of goods or services (other than for employment) either for their own benefit, or for any partnership or company with which they have an involvement in their private capacity, or on behalf of other persons or organisations.
- c. No purchase will be made from, and no sale made to employees, or any partnership or company with which employees have an involvement in their private capacity, in respect of goods or services, unless prior sanction has been obtained from the line manager in which the transaction arises. The line manager will consult with the Director, Human Resources on such matters.
- d. Employees will comply with University of Limerick detailed procurement (tendering and purchasing) policy and procedures, as well as complying with prescribed levels of authority for the sanctioning of any relevant expenditure.
- e. Employees will not negotiate or arbitrate on any matter affecting a University of Limerick contract or the purchase from, or sale of goods to the University where, in their private capacities, they are interested either as principals or as shareholders in a company so involved.

5. Related Documents

- Code of Conduct for Members of Governing Authority
- 2019 Code of Governance for Irish Universities
- University of Limerick Code of Governance
- Policy for Conflicts of Interest
- University of Limerick Travel & Subsistence Policy
- University of Limerick Official Entertainment Policy
- University of Limerick Anti-Fraud Policy
- University of Limerick IT Security Policy
- University of Limerick Acceptable Usage Policy
- University of Limerick Data Protection Policy
- University of Limerick Records Management & Retention Policy
- University of Limerick Risk Management Policy

6. Document Control

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