



**An Ghníomhaireacht  
Tithíochta**  
The Housing Agency

# **Ethical Guidelines and Conduct Standards**

**(Code of Business Conduct)**



# Contents

<b>1. Introduction</b>	<b>3</b>
<b>2. Values of the Housing Agency</b>	<b>4</b>
<b>3. Upholding Standards</b>	<b>5</b>
<b>4. Integrity</b>	<b>7</b>
<b>5. Conflict of Interest</b>	<b>9</b>
Disclosures of Interest	9
<b>6. Obligations</b>	<b>10</b>
<b>7. Administration</b>	<b>11</b>
<b>8. Confidentiality</b>	<b>12</b>
<b>9. Equity of Opportunity and Diversity</b>	<b>14</b>
<b>10. Dignity at Work</b>	<b>16</b>
<b>11. Sustainable and Environmental Responsibility</b>	<b>17</b>
<b>12. Reporting Concerns (Protected Disclosures)</b>	<b>18</b>
<b>13. Media</b>	<b>20</b>
<b>14. Housing Agency Assets</b>	<b>21</b>
<b>15. Misuse of Substances</b>	<b>22</b>
<b>Appendix 1: Governance Policies &amp; Procedures</b>	<b>23</b>
<b>Appendix 2: Human Resources Policies</b>	<b>24</b>
<b>Appendix 3: Statutory Obligations</b>	<b>25</b>

# 1. Introduction

The Housing Agency is a growing and dynamic organisation tasked with providing expertise and solutions to help deliver sustainable communities throughout Ireland. To ensure The Housing Agency's continued success, the following Code was developed to provide a working framework for the application of best practice to all of The Housing Agency's staff, affiliate workers, and Board members. This Code puts into practice the implications of the Ethics in Public Office Acts, 1995 and the Standards in Public Office Act 2001 (together the "**Ethics Acts**"). Staff and Board Members must adhere to all statutory responsibilities imposed on The Housing Agency and ensure compliance with any provisions within these Acts, as outlined in Appendix 3.

The standards of behaviour outlined in this Code are reflected in the Contract of Employment which stipulates that staff will comply with the Code in relation to standards and behaviour, health and safety, ethics, sexual harassment, anti-bullying, and confidentiality.


## Purpose of this Code

The purpose of this Code is to establish the general principles and standards that govern the professional activities and conduct of the Housing Agency's staff, affiliate workers, and Board members to ensure that The Housing Agency maintains a high level of credibility and public confidence. This Code relates to both the internal and external activities of The Housing Agency.

## 2. Values of the Housing Agency

In addition to its obligations as a state body, this code is written in accordance with the Housing Agency's values.

We will continue to embed our values throughout the organisation to guide and inform everything we do. We have placed people at the centre of everything we do to highlight the importance of our staff, our stakeholders, and the people we are working to support with housing needs:

Values and Behaviours Dashboard				
		Personal	With Colleagues	In Work
<b>Agility</b>		Show courage	Be flexible to achieve objectives	Explore ways to get things done
<b>Trust</b>		Keep our word	Promote an open and safe work environment	Set realistic expectations
<b>Impact</b>		Consider stakeholders' capabilities and needs	Set clear goals and monitor them	Seek feedback and evaluate
<b>Respect</b>		Be professional and courteous	Listen to all perspectives	Make good use of others' time
<b>Focus on People</b>		Show empathy	Promote opportunities for development	Welcome and recognise diversity
<b>Accountability</b>		Play our part	Be responsible to each other	Be open and transparent
<b>Excellence</b>		Commit to continuous learning	Hold ourselves to a high standard	Engage consistently and effectively
<b>Collaboration</b>		Maintain an open mind	Seek connections with others' work	Focus on agreed upon solutions




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### 3. Upholding Standards

The objectives of the Housing Agency's Ethical Guidelines and Conduct Standards are designed to ensure that our actions and behaviours align with our purpose, values, and objectives. These serve as guiding principles for all members of our organisation:

- The establishment of an agreed set of ethical principles that apply to staff, Board members, and any third parties working for or on behalf of The Housing Agency;
- To promote and maintain confidence and trust in The Housing Agency by consistently demonstrating integrity, professionalism, and ethical behaviour;
- To promote the development and application of ethical business practices;
- To ensure compliance with all relevant legislation, regulations, and organisational policies. By adhering to legal and ethical standards, we can mitigate risk and uphold the reputation and credibility of the Housing Agency.
- This includes compliance with procurement regulations, financial reporting requirements, data protection laws, and employment legislation.

Adherence to the Code is mandatory for all staff, Board Members, and third parties working for or on behalf of the Housing Agency as non-compliance undermines our work environment and reputation, with possible serious legal and operational repercussions. Staff and Board members must adhere to all applicable legislation and policies of the Housing Agency while performing their duties or while in situations which may affect their ability to perform their duties.

Violations by staff may result in disciplinary measures ranging from verbal and written warnings to suspension, and termination for the most severe breaches. Further information can be found in the [Disciplinary Handbook](#) available on the staff noticeboard. Board members who have breached or who are in potential breach of this code may be requested to resign or may request an exemption from any such breach or potential breach, by a determination of a special majority of the Board member's peers.

Employees are encouraged to report suspected violations via the measures set out in the [Protected Disclosures Policy](#) which offers protections against retaliation for good-faith reporters. Board members shall report any breaches or potential breaches of this code to the Board via the Chair. Adhering to this code ensures a positive work

environment, upholds public trust, and supports the Housing Agency's effective functioning.

## 4. Integrity

- Staff and Board members are obligated to disclose any outside employment or business interests in conflict or in potential conflict with the business of the Housing Agency.
- Staff and Board members may participate in political activities in their private capacity, provided these activities do not negatively impact their work or conflict with any other Housing Agency policy or undermine the impartiality of the Housing Agency. Political or religious opinions should not be expressed or disseminated within the workplace.
- Staff and Board members are welcome to reference their involvement in the Housing Agency on their personal online profiles, and to share/reproduce content from the Housing Agency's profiles. However, if identifying themselves as being associated with the Housing Agency, they must include a disclaimer that the content they post reflects their own views and not those of the Housing Agency.
- Those who identify themselves as being associated with the Housing Agency must consider implications that their personal posts have for the reputation and public perception of the organisation. Offensive, inappropriate, inflammatory, or discriminatory language should not be used, and participating in aggressive online arguments should be avoided.
- Staff and Board members should avoid giving or receiving 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.
- Staff and Board members should conduct purchasing activities of goods or services in accordance with best practice, detailed information can be found in the Housing Agency's .
- Staff and Board members will ensure a culture of claiming expenses only as appropriate to business needs and in accordance with good practice in the public sector generally.

- Staff and Board members will ensure that The Housing Agency's reports and accounts accurately reflect the business functions and are not misleading or designed to be misleading.
- Staff and Board members will avoid the use of the Housing Agency's resources or time for personal gain, for the benefit of persons/organisations unconnected with the body or its activities, or for the benefit of competitors.
- Staff and Board members commit not to acquire information or business secrets by improper means.



## 5. Conflict of Interest

The Housing Agency recognises that staff and Board members of a public sector body can be provided with opportunities that may allow for potential conflicts of interest to arise. A Conflict of Interest policy has been developed to govern such instances, and to protect the integrity of the Agency's decision-making and reputation.

The Ethics Acts apply to the Housing Agency, details of which are outlined within the Conflict of Interest Policy.

### Disclosures of Interest

#### Board Member Disclosures

Under the Ethics Acts members of the board are designated directors, which includes the Chief Executive Officer and are obliged to declare details of their employment and all business interests including property and shareholding which could involve a potential conflict of interest or could influence their functions as a member of the Board. Interests of friends, family and associates must also be declared. This information is held in a Register of Interests, access to this register is restricted to the Chairperson, Secretary of the Board, and limited members of the board secretariat team.

#### Staff Member Disclosures

Certain members of staff are also required to comply with the Ethics Acts, this is outlined within the Conflict of Interest Policy.

Certain staff members are required to:

- Make an annual statement of interests if they hold a designated position of employment;
- Make an annual statement if they have an interface with any commercial or regulated entities;
- Declare to their line manager if they become aware of an interest which could be, or be perceived to be, a conflict of interest with their official functions.

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## 6. Obligations

- Board members and staff are required to adhere the Housing Agency's controls designed to prevent fraud, including following procedures for expense and travel claims.
- All board members and staff are required to cooperate with internal audit in the internal audit process.
- Board members should endeavour to attend all Board and Committee meetings of which they are a member.
- Board members shall use their best judgement to balance the relative importance of issues to be determined by the Board in setting policies and avoiding operational matters.
- Board members shall educate other Board members on matters within their own area of expertise to better enable the Board to make decisions collectively.
- The management and staff will work with the Audit and Risk Committee in implementing adequate controls to ensure compliance with best practices in financial procedures and reporting.

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## 7. Administration

- Board Members shall actively support The Housing Agency's Executive by providing overall direction, resources, and time frames to achieve the identified vision and goals of The Housing Agency.
- Board Members shall publicly support actions taken by The Housing Agency's Executive to implement programs and achieve the objectives contained in The Housing Agency's plans and budgets as approved by the Board.
- Board Members shall recognise the difference between the role of the Board in setting policies and strategic objectives, and the role of the staff in implementing them.
- Board Members shall not create any additional work for staff without the approval of The Housing Agency's CEO.
- Staff and Board Members shall actively adhere to all relevant laws, regulations, and guidelines governing administrative practices. This includes compliance with procurement regulations, financial reporting requirements, data protection laws, and employment legislation.
- The Housing Agency shall manage all financial resources responsibly to ensure the efficient and effective delivery of housing services. Activities will be prioritised based on strategic objectives to maximise the impact of expenditure.

## 8. Confidentiality

Due to the nature of their positions, staff and Board Members may be privy to information and materials of a sensitive or confidential nature to the organisation and its activities and are therefore required to maintain confidentiality in such matters unless disclosure is required by law.

The following measures are expected of staff, Board Members, and affiliates of the Agency to ensure that the highest standards of confidentiality are adhered to at all times:

- All staff, board members, and any third parties working for or on behalf of the Agency are required to maintain the highest level of confidentiality regarding sensitive information obtained during the course of their duties with the exception of times when documents or information become a matter of general public knowledge. Confidential information should only be accessed and disclosed to individuals on a need-to-know basis for performing their duties and responsibilities.
- Staff and Board Members shall not use confidential information obtained through their association with the Agency to further their private interests or the private interests of their friends, relatives, or associates.
- Staff and Board Members shall comply with any Agency policies and procedures that guide the storage, use, and transmission of any information of the Agency, including the use of computer databases or email systems.
- Board Members shall treat Board discussions as a “safe haven” for the benefit of their peers and the Agency’s Executive and shall not repeat any discussions concerning the Agency’s business and practices, or any discussions of a personal nature of their peers and the Agency’s Executive, in a public setting.
- Staff and Board Members should ensure that this confidentiality is maintained where membership of the Board has ceased or where employment has ended with the Agency. In particular, the Agency recommends that the acceptance of further employment where the potential for conflict of interest arises should be avoided during a reasonable period of time after the exercise of a function in the Agency.

- The Board members support the management and staff of the Housing Agency in the provision of access to general information relating to The Housing Agency's activities in a way that is open and enhances its accountability to the general public, while respecting the confidentiality of sensitive information held by The Housing Agency.
  - Sensitive material in this instance includes commercially sensitive information (including but not limited to future plans, or details of major organizational or other changes such as restructuring)
  - Personal information.
  - Information received in confidence by The Housing Agency.
- Management and staff will observe appropriate prior consultation procedures with third parties where, exceptionally, it is proposed to release sensitive information in the public interest.
- They will comply with relevant statutory provisions (e.g., data protection legislation, the Freedom of Information Act, 2014).
- Staff will maintain clear and accurate records of any relevant information in an accessible and secure format and will minimise the collection of physical documentation where possible. The management and staff will conform with procedures laid down by the Board in relation to conflict of interest situations, including in regard to acceptance of positions following employment and/or engagement by a state body that may give rise to the potential for conflicts of interest and to confidentiality concerns.

## 9. Equity of Opportunity and Diversity

### **Equal Opportunity Legislation**

The Housing Agency, like all public bodies in Ireland, has a responsibility to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans. This is a legal obligation under the Public Sector Equality and Human Rights Duty.

In accordance with the Employment Equality Acts and the Equal Status Acts, the Housing Agency endeavors to ensure that all individuals have equal opportunities in employment and that fairness is exercised in any business dealings.

As such, the Housing Agency will recruit, train, and promote individuals based on their performance and in accordance with applicable laws and without regard to such personal characteristics as race, colour, religion, age, gender, national origin, disability, sexual orientation, or marital status.

### **Work Environment**

The Housing Agency aims to ensure that a fair and supportive working environment is maintained at all times. This includes:

- **Inclusive Principles and Practices**

Implementing policies that promote inclusivity and prevent discrimination. These policies are reviewed regularly and updated to comply with legislative changes and best practices.

- **Accessibility**

Ensuring that our physical and digital environments are, where practicable, accessible to all employees and stakeholders, including disabled people. This commitment includes making reasonable accommodations to support disabled people.

By embedding equality and diversity into our core values and daily practices, we aim to create a workplace where everyone feels valued, respected, and empowered to contribute to our aims and objectives. The Housing Agency is dedicated to continuous improvement in this area, ensuring that our policies and actions reflect our commitment to an equitable and inclusive environment.

The Housing Agency has demonstrated this commitment to promoting diversity, equality, and inclusion through signing the Diversity Charter as well as working on the Investors in Diversity Accreditation through Irish Centre for Diversity.

Diversity Charter Ireland is a network of signatory organisations seeking to build best practice in promoting diversity, equality, and inclusion in their workplaces. By signing Diversity Charter Ireland, the Housing Agency make public a statement of commitment, to address diversity, equality, and inclusion in the workplace in a framework that is tailored to the Irish context.

Investors in Diversity (IiD) provides a clear and structured framework. Supported by ibec, IiD is built over three levels – Bronze, Silver and Gold. Each level is designed to guide your organisation towards excellence. The Housing Agency is working to gain the silver with the aim of building towards a gold level.



## 10. Dignity at Work

We are dedicated to creating a work environment where all employees are treated with dignity and respect. We believe that every individual has the right to work in an environment free from harassment, bullying, and any form of discrimination.

- **Harassment**

Includes unwanted conduct related to any of the grounds covered under the Employment Equality Acts which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person. This may consist of a single incident, or repeated inappropriate behaviour.

- **Bullying**

Repeated inappropriate behaviour, direct or indirect whether verbal, physical, or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment which could reasonably be regarded as undermining an individual's right to dignity at work.

Employees who believe they have been subjected to harassment, bullying, or any other behaviour that undermines their dignity are encouraged to report their concerns. The Housing Agency ensures that all complaints are taken seriously and investigated promptly and thoroughly.

Further information can be found in the Housing Agency's Dignity at Work policy.



## 11. Sustainable and Environmental Responsibility

The Housing Agency is committed to being environmentally and socially responsible in respect of sustainable and environmental goals. Our impact in this area is reliant on the behaviours of staff to focus on environmental practices and working towards our strategic objectives around sustainable communities. The Housing Agency understands sustainable communities to be ones that are vibrant, offering a range of appropriate housing options to accommodate various demographic and income levels, being inclusive and diverse and environmentally responsible. Good quality housing is central to achieving sustainable communities that endure in the longer term.

- We require all staff to engage with the practices throughout the Housing Agency offices to ensure we reduce our energy use and waste to mitigate the effects of climate change.
- Sustainability should be a focus of our work across the Agency. All staff should strive to include sustainability and the delivery of sustainable communities in their work.

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## 12. Reporting Concerns (Protected Disclosures)

The Housing Agency is committed to ensuring that the culture and work environment are such that any employee/worker is encouraged and supported to report on any issue that may impact adversely on the Housing Agency's ability to deliver a high-quality service.

Consistent with the Housing Agency's existing policies, it is expected that any appropriate issue raised by an employee/worker with their line manager relating to a matter of the business of the Housing Agency will be dealt with professionally and appropriately. This is essential in ensuring that all significant risks arising for the Housing Agency are identified and effectively managed. In addition, an employee/worker appropriately raising any issue of concern will not be penalised for doing so.

A culture of 'speaking up' is encouraged and practically implemented via the Protected Disclosures policy which allows staff or individuals to report any concerns they may have through a dedicated communication channel that protects their privacy and right to confidentiality. This Policy focuses on issues of wrongdoing (as defined in the Protected Disclosures (Amendment) Act, 2022) and the resolution of which are in the public interest. There is an important distinction to be made between raising a concern regarding relevant wrongdoings as defined in the Protected Disclosures (Amendment) Act, 2022 covered by this policy and other issues that may be raised relating to the normal business of the Housing Agency which do not fall under this policy.

It is to be expected that concerns in relation to day-to-day operational matters will, in the normal course of events, be brought to the attention of the relevant line manager and dealt with accordingly, or through agreed structures already established by the Housing Agency (e.g., Health & Safety matters should be addressed through the procedures established in The Housing Agency's Health & Safety Management System). Similar considerations apply to grievances or allegations relating to matters such as harassment/bullying which are not covered by this policy and which will be dealt with under the Housing Agency's Grievance Policy and Procedure, and Dignity at Work Policy.

Malicious reporting or knowingly making false reports is a violation of the Code and may result in disciplinary measures.

## 13. Media

- The Chief Executive Officer and Chairperson are the official spokespersons of The Housing Agency in respect of all media comments and interviews unless otherwise approved by them.
- Each media request will be handled individually and should go through The Housing Agency's Communication Manager so a record can be kept of media engagements.
- In the event of managing an emergency or crisis, the key contact person is the Chief Executive Officer.
- The Chairperson and Chief Executive Officer shall discuss possible interviews with each other, or with a designated communications representative of The Housing Agency.
- The Chairperson, Chief Executive Officer, Board Members, and any staff who may be approved to make comments to the media should ensure to make comment on items which represent the Board and Executive wholly.
- The Chairperson, Chief Executive, Board Members, and staff shall ensure that any comments made by them to the media outside of the context of The Housing Agency's business and practices is attributed to them in their personal capacity and not in their capacity as a member of the Board or Executive.
- The Executive will keep the Board informed of any expected interviews or comments provided to the media.

## 14. Housing Agency Assets

Staff and Board Members shall not misappropriate The Housing Agency's assets for personal use. Board members are entrusted with the care, management, and cost-effective use of The Housing Agency's assets and resources, including the use of The Housing Agency's name, and should not make significant use of these resources for their own personal benefit or use.

Staff and Board Members shall ensure that all Agency assets assigned to them are maintained in good condition and shall be accountable for such assets.

## 15. Misuse of Substances

Misuse of alcohol, drugs, medications, and other substances can diminish job performance and can compromise the safety of others. The Housing Agency prohibits the consumption, possession, or distribution of drugs/alcohol on the premises, during working hours, or on business. Individuals should not work in an impaired state or allow substances to interfere with the productivity and judgement of themselves and those around them. Arriving at work having partaken in the use of drugs or alcohol is strictly prohibited.

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## Appendix 1: Governance Policies & Procedures

Policy/Doc
Ethical Guidelines and Conduct Standards (Business Code of Conduct)
Risk Policy and Framework
Confidentiality Policy
Protected Disclosures Policy
Conflict of Interest Policy
Gifts and Hospitality Policy
Anti-Fraud and Anti-Corruption Policy
Data Protection Policy
Records Management Policy
Customer Care Policy
Customer Charter

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## Appendix 2: Human Resources Policies

Policy/Doc
Bike to Work Scheme
Blended Working Policy
Dignity at Work
Disciplinary Handbook
Eye Examination
Smoking Policy
Staff Handbook
Payroll, Travel & Subsistence Policy
Recruitment & Selection/Candidate Booklet



## Appendix 3: Statutory Obligations

Legislation/Statutory Instruments/Circulars
Housing and Sustainable Communities Agency (Establishment) Order 2012 – Local Government Services (Corporate Bodies) Act 1971 (No. 6 of 1971), as amended by the Local Government Services (Corporate Bodies) (Confirmation of Orders) Act 2008 (No. 9 of 2008), and the Local Government (Miscellaneous Provisions) Act 2012 (No. 17 of 2012);
Housing (Miscellaneous Provisions) Act 2014
Pyrite Resolution Act 2013
Planning & Development (Housing) and Residential Tenancies Act 2016
Data Protection Act 2018 and General Data Protection Regulations and (Data Protection and Privacy) Regulations 2003 and the European Communities (Electronic Communications Networks and Services) (Data Protection and Privacy) (Amendment) Regulations 2008
Data Sharing and Governance Act 2019
European Communities (Late Payment in Commercial Transactions) Regulations, 2002
Ethics in Public Office Act, 1995
Standards in Public Office Act, 2001
Safety, Health, and Welfare at Work Act, 2005
Protected Disclosures (Amendment) Act 2022
Financial Emergency Measures in the Public Interest Acts, 2009, 2010, 2013 and 2015
The Organisation of Working time Act 1997
Equal Status Act, 2000, Equality Act 2004, Disability Act, 2005-Part 5, and Civil Law (Miscellaneous Provisions) Act 2008
Regulation of Lobbying Act 2015
Code of Practice for the Governance of State Bodies 2016
Public Spending Code
Circular 12/2010 – Protocol for Civil Servants Nominated to State Boards
Circular 13/2014 – Management of and Accountability for Grants from Exchequer Funds

Circular 25/2016 – Protocol for the Provision of Information to members of the Oireachtas
Circular 14/2020 – Code of Practice for the Governance of State Bodies Annex (2020) on Gender Balance, Diversity, and Inclusion
Department of Housing, Planning & Local Government and Public Expenditure & Reform/Finance circulars and directives
Public Procurement Guidelines
Freedom of Information Act 2014
Irish Human Rights and Equality Commission Act 2014 (Public Sector Equality and Human Rights Duty)
Official Languages (Amendment) Act 2021
Affordable Housing Act 2021
Remediation of Dwellings Damaged by the Use of Defective Concrete Blocks Act 2022
Circular Housing 12/2022 - Defective Concrete Blocks Grant Scheme - Dwellings Damaged by the Use of Defective Concrete Blocks in Construction (Remediation) (Financial Assistance) (Amendment) Regulations, 2022 (S.I. 85 of 2022)