



Code of Conduct for Employees

All employees are required to observe the following fundamental principles:

Integrity

- Members of staff who hold certain designated positions for the purposes of the Ethics Acts shall disclose outside employment/business interests which they consider may be in conflict or in potential conflict with the business of Trinity College or may be perceived as such. Employees to whom this provision applies shall comply fully with the disclosure procedure utilised by the University.
- Employees shall not at any time engage in, or be connected with any outside employment/business or activity which would, conflict, or be in potential conflict, with the interests of Trinity College, be inconsistent with their official position, or tend to impair their ability to carry out their duties as employees.
- Employees of the University shall 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. The overriding concern is that the actions of employees be above suspicion and not give rise to any actual or potential conflict of interest, and that their dealings with commercial and other interests should bear the closest possible scrutiny.

Gifts

- The receipt of gifts, as distinct from hospitality, by employees, from those with whom they have official dealings shall be governed by the highest standards. The following general guidelines provide a framework within which decisions in this area can be made or local rules formulated. 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.
- Subject to any rules which Trinity College may determine, an employee may accept and retain gifts of modest value (e.g. diaries, pens, etc.). Any gift of more significant value shall be refused or, if such refusal would cause offence, shall be handed over by the employee concerned to the Head of School/Area, or to the Secretary's Office
- A gift, other than a gift of modest value, given to an employee by virtue of his or her official relationship with the donor, or Trinity College's commercial dealings with the donor, shall be regarded as property of Trinity College.

- Particular care should be taken in relation to gifts from donors who stand to derive a personal or commercial benefit from their relationship with Trinity College.
- Cash, gift cheques or any vouchers that may be exchanged for cash shall not be accepted regardless of the amount.
- Employees shall not solicit gifts, directly or indirectly.
- Employees shall not approach any business with which they have contact through their official duties seeking sponsorship or support for any club, charitable organisation, association, trade union or other organisation. Trinity College shall apply discretion in the application of this rule to instances of very small patronage. Staff members / staff groups should seek guidance from the Secretary to the College if any doubt exists in this regard.
- Employees shall not accept special facilities or discounts on private purchases from suppliers with whom they have official dealings.
- It should be noted that, under the Prevention of Corruption Acts 1889 to 2001 as amended by the Ethics in Public Office Act 1995, the corrupt giving of gifts to, or receipt of gifts by, employees is a criminal offence punishable by imprisonment, or fine, or both. The Acts provide that money, gifts or other consideration received by an employee from a person holding or seeking to obtain a contract from Trinity College is deemed to have been received corruptly unless the contrary is proved.

Hospitality

- It is impossible to lay down definite rules covering the acceptance of hospitality in all circumstances. The overriding concern is that all actions of employees in carrying out their official duties be above suspicion and not give rise to any actual or potential conflict of interest, and that their dealings with commercial and other interests should bear the closest possible scrutiny. It is accepted that employees shall not be put in a position where they cannot accept what are regarded as normal courtesies in business relationships. However, in their contacts with outside organisations or persons, every care shall be taken by employees to ensure that their acceptance of hospitality does not influence them, and could not reasonably be seen to influence them, in discharging their official functions.
- The following general guidelines provide a framework within which decisions in this area can be made or local rules formulated.

- All offers of hospitality from commercial interests which have or might have contractual relations with Trinity College shall be reported by that employee to his or her manager for direction.
- No objection would normally be made to the acceptance of what is regarded as routine hospitality, for example, a business lunch. What may be regarded as “routine” for this purpose will depend on a number of factors such as the value of the hospitality offered, the frequency of offers, whether there is an element of reciprocity and the general circumstances in which it is offered (for example, whether it is offered by a company to all its customers or is directed at specific or potential customers). Certain types of hospitality (for example involving travelling abroad or holiday weekends) shall not be regarded as routine and shall always be referred to management for direction.
- Employees shall not accept offers of hospitality which go beyond the routine practices referred to above, except where acceptance of such an offer can be clearly shown to be in the interest of Trinity College and has been approved by the manager of the employee concerned.

Acquiring goods and services

- Trinity College is committed to conducting its purchasing of goods and services in accordance with public policy and best business practice and its purchasing regulations reflect this. In this regard employees shall specifically note the following standards:
 - i. An employee shall not seek contracts with Trinity College for the supply of goods or services (other than for employment) either for his or her own benefit, or for any partnership or company with which he or she has an involvement in his or her private capacity, or on behalf of other persons or organisations;
 - ii. Trinity College shall not knowingly undertake to contract for the supply of goods or services (other than for employment) with an employee, or with any partnership or company with which an employee has an involvement in his or her private capacity;
 - iii. No purchase shall be made from, and no sale made to, an employee, or any partnership or company with which an employee has an involvement in his or her private capacity, in respect of goods or services, unless prior sanction has been obtained from the relevant Manager in the area in which the transaction arises, following consultation with the Secretary to the College.
- An employee who enters into any undertaking, or who holds any outside interest, or participates in any outside business affecting, or likely to affect, a Trinity College contract, or the purchase or sale of Trinity College property, shall immediately disclose the nature and extent of his or her interest to Trinity College. An employee should not accept a directorship (except as a nominee

of Trinity College) in any company holding a Trinity College contract or in a company which may reasonably be expected to hold such a contract in future.

- Employees shall not negotiate or arbitrate in any matter affecting a Trinity College contract or the purchase from, or sale of, goods to Trinity College where, in their private capacities, they are interested either as principals or as shareholders in a company being one of the principals in the matter under consideration.

Information

- Trinity College is committed to providing access to general information relating to its activities in a way that is open and enhances its accountability to the general public. All employees shall ensure that they deal with queries from members of the public in an open and helpful way. Under the Freedom of Information Acts 1997 and 2003 (FOI Acts), members of the public (including employees of College) enjoy a legal right of access to information held by Trinity College and other public bodies, subject to certain exemptions defined in the FOI Acts. Arising from the FOI Acts, certain employees members (trained as Decision Makers) are given explicit responsibility for the provision of information to members of the public on foot of requests under the FOI Acts.
- Particular care shall be taken to safeguard information concerning the private or commercial affairs of students, members of the public, clients, or organisations, which may have been submitted in connection with official business, on condition, or on the reasonable assumption, that it would remain confidential. The FOI Acts recognise the importance of protecting such information in the normal course from third party access. Where exceptionally sensitive information of a personal, commercially sensitive or confidential nature is under consideration for release in the public interest, the FOI Acts impose a number of safeguards to ensure the rights of the person(s) concerned are fully respected.
- Employees of the College shall observe due confidentiality in relation to all discussions and decisions taken at meetings of the Board, Council and other bodies in College, and will treat in the strictest confidence, all information received in their capacity, either as members of these bodies, or as attendees.

Obligations

- Employees of College shall comply with detailed tendering and purchasing procedures, as well as complying with prescribed levels of authority for sanctioning any relevant expenditure;

- It is acknowledged that the acceptance of positions following employment and/or engagement by a third level institution can give rise to the potential for conflicts of interest and to confidentiality concerns. In any case where an employee intends to take up an appointment in a competitor institution, or other similar organisation, where there may be, or appear to be a conflict of interest, the matter shall be referred to the Staff Secretary, who may consult with the Secretary to the College as appropriate. College's consent will not be unreasonably withheld, but it is expected that matters related to confidentiality will be mutually agreed.

Loyalty

- Employees of Trinity College acknowledge their responsibility to Trinity College and shall be fully committed to all its activities, with due respect to the tenets of academic freedom, while mindful that Trinity College itself must at all times take into account the interests of its students, staff and providers of funds including taxpayers and society generally.
- The Board and employees of Trinity College acknowledge the duty of all to conform to highest standards of business ethics, including impartiality, integrity and respect for the law.

Fairness

- Trinity College shall be committed to complying with employment equality and equal status legislation.
- Trinity College shall be committed to fairness in all business dealings.
- Trinity College shall value its students, suppliers, employees and customers and treat all its students, suppliers, employees and customers equally and loyally.

Behaviour at Work

- The Board of Trinity College places the highest priority on promoting and preserving the health and safety of its employees and students. This Code places an obligation on all employees to ensure that they familiarise themselves with College policies and practices regarding Dignity and Work, and Health and Safety, and that they act accordingly.
- Employees of Trinity College shall endeavour to ensure the proper, effective, and efficient use of College resources. All employees shall take proper and reasonable care of College property, and not to use, or permit its use, for unauthorised purposes. ("De minimis" use, i.e. use that results in no actual cost to the College/negligible cost, is permitted).

- Employees of the College shall avoid the use of Trinity College resources or time for personal gain, for the benefit of persons/organisations unconnected with the College or its activities, or for the benefit of competitors.
- Employees of the College are required, to attend at work as required and not to absent themselves from duty without proper authorisation; to comply with the terms of the sick leave regulations; at all times, to act in a manner consistent with, the proper performance of the functions of their Trinity College position, and with the maintenance of public confidence in such performance, including refraining from conduct which might impair performance;¹ to ensure non-discriminatory language is used in all communications, both internal and external, including display material and documents in electronic form; and not to engage in any outside business or occupation during their normal hours of duty.

Responsibility

- Trinity College shall ensure that all employees have appropriate access to a copy of the Code.
- Trinity College shall provide practical guidance and direction as required on such areas as gifts and entertainment and on other ethical considerations which arise routinely.

Review

- Trinity College shall review this Code of Conduct as appropriate, and in any case, at not less than four-year intervals.

Document Control

Approved by: Board

Date Code of Conduct approved: 16 June 2021

Date of Revised Code of Conduct approved: TBC

Date of next review: 2027/28

Officer responsible for review: Deputy Secretary to the College

¹ Trinity College's Employee Assistance Programme is available to help staff manage personal difficulties, which if left unaddressed, might adversely affect their work performance and/or attendance and their quality of life.