

CODE OF BUSINESS CONDUCT FOR THE NATIONAL CANCER REGISTRY

INTRODUCTION

INTENT AND SCOPE

It is the objective of the National Cancer Registry Board to ensure that the highest possible standards of integrity are maintained. This document sets out guidelines to be followed in this regard. This code describes the principles of conduct for Board members and staff of the National Cancer Registry and applies to all members of the National Cancer Registry Board and to all permanent and contract employees of the Registry, including the Director.

All recipients of this Code of Conduct will acknowledge receipt and understanding of same.

The annual report of the Chair of the Board will include a statement affirming that this Code for Board members and employees is in place and has been adhered to.

OBJECTIVES

The basic objectives of this Code are to:

- establish an agreed set of ethical principles
- promote and maintain confidence and trust
- prevent the development or acceptance of unethical practices.

GENERAL PRINCIPLES

INTEGRITY

1. Board members should disclose outside employment/business interests in conflict or in potential conflict with the business of the Registry;
2. Management and employees should not be allowed to be involved in outside employment/business interests in conflict or in potential conflict with the business of the Registry;
3. Board members should encourage a culture of claiming expenses only as appropriate to business needs and in accordance with good practice in the public sector generally;
4. 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, should not be given or accepted;
5. The Registry will prepare an explanatory booklet providing practical guidance and direction on such areas as gifts and entertainment and on other ethical considerations which arise routinely.
6. Purchasing of goods/services should be in accordance with best business practice;
7. The Registry's accounts/reports should accurately reflect business performance and should not be misleading or designed to be misleading;
8. The Registry's resources or time should not be used for personal gain, or for the benefit of persons/organisations unconnected with the body or its activities

9. Information should not be acquired by improper means.

DISCLOSURE OF INTERESTS/ AVOIDANCE OF CONFLICT OF INTEREST

1. To avoid conflicts of interest and the possibility of unjust enrichments each Board member furnishes to the Director details of his or her employment and all other business interests including share holdings which could involve a conflict of interest or could materially influence his or her functions as a member of the Board. Interest of family and other connected persons or bodies are also declared. This information is held in a Register of Board member interests and accessible only by the Chairperson, Director and Administrator of the Registry.
2. When a matter arises which might involve a conflict of interest the Board member is required to inform the Director.
3. Shareholdings valued at less than €15,000 need not be disclosed.
4. Where doubt arises about the need for disclosure the member consults the Chairperson.
5. The Director maintains a confidential register of Board members interests which is updated annually. Only the Chairperson, Director and Administrator of the Registry have access to the register.
6. When a matter arises which may relate to interests of the Chairperson, the Board will appoint a Vice Chairperson to take the Chair at the relevant Board meeting. Documents relating to dealings with interests of a member of the Board are not made available to the member concerned. Where such documents are received they should be returned. A member absents himself from discussions relating to such dealings.
7. Where a question arises as to whether or not a case relates to a member's interests the Chairperson adjudicates.
8. The Director is required to complete a register of interests in line with the above.
9. When a matter arises which might involve a conflict of interest the Director is required to inform the Chairperson.

ENGAGEMENT IN OUTSIDE EMPLOYMENTS

1. Staff members may engage in outside employments, consultancies and / or businesses which are not directly related to or associated with their position in the organisation. Subject to conflict of interest criteria set out above, no objection to staff engagement in such activities applies providing that they do not:
 - a. Interfere with or diminish the capacity of the relevant Staff Member to discharge his/ her duties and responsibilities.
 - b. Result in diminution in hours worked by the relevant Staff Member for the organisation to levels below those contracted for or standard effort required to enable him / her undertake duties and responsibilities assigned.
2. Members of staff are not permitted to be involved in outside employments/businesses which may give rise to conflict with the business/interests of the Registry.

INFORMATION

1. The Board, management and employees of the Registry should support access to general information relating to the body's activities in a way that is open and enhances its accountability to the general public.

2. The confidentiality of sensitive information held by the Registry should be respected. This would constitute material such as:
 - a. personal information;
 - b. information received in confidence.
 - c. commercially sensitive information
3. Appropriate prior consultation procedures with third parties should be held where, exceptionally, it is proposed to release sensitive information in the public interest. In the case of personal information this should be done only with the consent of the individual.
4. The Board and staff should comply with relevant statutory provisions (e.g. data protection legislation, the Freedom of Information Act, 1997).
5. Obligations with regard to the non-disclosure of privileged or confidential information do not cease when Board membership or employment in the body has ended.

OBLIGATIONS

1. All obligations imposed by the National Cancer Registry Board (Establishment) Order and any other statutory obligations should be fulfilled ;
2. The Registry should comply with detailed tendering and purchasing procedures, as well as complying with prescribed levels of authority for sanctioning any relevant expenditure;
3. Controls should be introduced to prevent fraud, including adequate controls to ensure compliance with prescribed procedures in relation to claiming of expenses for business travel;
4. Board members should use their reasonable endeavors to attend all Board meetings;
5. The Board should deal with the issue of post resignation/retirement employment, appointment and/or consultancy of its members and employees by the private sector and should ensure that any procedures that it may have put in place in this regard are monitored and enforced.
6. Staff and Board members should 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;

LOYALTY

Board and staff should acknowledge

1. the responsibility to be loyal to the National Cancer Registry and fully committed to all its activities while mindful that the Registry itself must at all times take into account the interests of the Department of Health.
2. the duty of all to conform to the highest standards of business ethics.

FAIRNESS

1. All procedures are in compliance with employment equality and equal status legislation;
2. The Registry has a commitment to fairness in all business dealings.
3. The Registry should compete vigorously and energetically but also ethically and honestly;
4. The Registry will value customers and treat all customers equally;

WORK/EXTERNAL ENVIRONMENT

The Registry should:

1. Place the highest priority on promoting and preserving the health and safety of employees;
2. Ensure that community concerns are fully considered; and
3. Minimise any detrimental impact of the operations on the environment.

RESPONSIBILITY

This Code of Business Conduct should be circulated to all Board members and employees for their retention.

REVIEW

This Code of Business Conduct should be reviewed by each incoming Board and at other times as appropriate.

CODE OF BUSINESS CONDUCT FOR THE NATIONAL CANCER REGISTRY,
ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING OF SAME

Please complete and return this page as soon as possible to:

National Cancer Registry,
Building 6800,
Cork Airport Business Park,
Kinsale Road,
Cork.

I acknowledge receipt and my understanding of the Code of business conduct for the National Cancer Registry.

Signed: _____

Date: _____

Name in block capitals: _____