

Code of Conduct Policy

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Version History		
Version	Date	Comment
1.0	2022	Original Policy
2.0	2024	Revised and Updated
<p>This Code of Conduct will be reviewed regularly and updated as necessary to ensure its effectiveness and relevance. Employees, and relevant stakeholders, will be informed of any significant changes.</p> <p>Planned date for next review: Q4 2026</p>		

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Version 2.0

Description of the Code

As servants of the public sector, all representatives of BIM are required to be personally honest and trustworthy and to at all times act with integrity.

This Code of Conduct (“the Code”) sets out the principles and standards of conduct and integrity which should govern the behaviour of BIM employees to ensure a respectful, professional and ethical work environment.

Purpose and Objectives of the Code

The Code of Conduct is fully aligned with BIM’s Core Values of Trust, Partnership, Teamwork, Inclusion, and Integrity.

Its purpose and objectives are to:

- Promote a culture that fosters the highest standards of ethics, accountability and integrity.
- Ensure that all employees understand their responsibilities and the expectations regarding their conduct.
- Promote and maintain confidence and trust in the employees of BIM.
- Prevent the development or acceptance of unethical practices.
- Promote compliance with best current governance and management practices in all the activities of BIM.
- Set out an agreed set of ethical principles supported by organisational policies and procedures that employees are familiar with and adhere to.

Scope of the Code

This Code applies to:

- All employees and Board and sub-committee Members.
- All activities, including work-related events, online interactions, and external engagements representing BIM.

Roles and Responsibilities

- BIM Board, including sub-committees
 - Lead by example in demonstrating ethical behavior.
 - Ensure policies and procedures support responsible conduct.
 - Resolve conflicts of interest and ethical dilemmas.
 - Adhere to all aspects of the Code of Conduct and underpinning policies.
 - Act honestly, respectfully, and collaboratively.
- Senior Leadership Team
 - Oversee the implementation and enforcement of this Code.
 - Model required standards of conduct and champion ethical practices.
 - Adhere to all aspects of the Code of Conduct and underpinning policies.
 - Act honestly, respectfully, and collaboratively.
- Managers
 - Communicate expectations of the Code to their teams.
 - Monitor compliance and address breaches.
 - Provide guidance and escalate issues as needed.
 - Adhere to all aspects of the Code of Conduct and underpinning policies.
 - Act honestly, respectfully, and collaboratively.
- Employees
 - Adhere to all aspects of the Code of Conduct and underpinning policies.
 - Act honestly, respectfully, and collaboratively.

Application of the Code of Conduct

The Code forms part of the terms and conditions of employment of all BIM staff who are expected to apply its spirit, and terms, at all times. The policy will be consistently applied and reinforced for all employees, both existing and new. A copy will be given to every employee on commencement with BIM. Employee Induction must include instruction regarding same. Employees are required to certify in writing that they have received and read the Code. The Code will be circulated to all existing employees who will be required to sign a similar declaration. This will be renewed annually and coordinated by BIM Human Resources.

Employees are encouraged to seek clarification from a line manager or from BIM Human Resources or the Director of Corporate Services, at any time on any aspect of the interpretation of any part of the Code. Staff are reassured that all such requests will be treated seriously and addressed promptly.

It is important to draw employees' attention to the fact that breaches of the Code will constitute a breach of terms of employment and, as such, may result in disciplinary action.

Board and sub-Committee members will receive a copy of the Code on appointment. All Board and sub-committee members will receive any training and support on the Code that they require.

Board members must sign an annual compliance statement, confirming adherence to the Code's provisions, including ethics and conflicts of interest.

Regular internal audits and oversight mechanisms are in place to ensure adherence to the ethical guidelines set out here.

Core Principles

- Professionalism
 - Represent BIM positively and maintain high standards in service delivery and professional conduct at all times.
- Respect and Inclusion
 - Treat all colleagues, members of the public and all stakeholders with respect.
 - Foster an inclusive environment that values diversity.
 - Avoid discrimination, harassment, or bullying in any form.
- Integrity
 - Uphold honesty, impartiality and transparency in all business dealings.
 - Avoid engaging in fraudulent or unethical activities.
 - At all times respect the law and never act in a manner which they suspect is illegal.
 - Abide by guidelines in respect of offers of gifts or hospitality
 - Adhere to the Conflict-of-Interest Policy to maintain impartiality.
- Health and Safety
 - Adhere to workplace safety standards and protocols.
 - Report hazards or unsafe practices immediately.
- Confidentiality and Disclosure of information
 - Protect sensitive information and comply with data protection laws.
 - Avoid unauthorised disclosure of confidential or proprietary information.

Reporting and Compliance

- Reporting
 - Employees should seek advice where there may be a breach of this Code (perceived or otherwise) and/or report violations of this Code to their manager, a HR representative or the Director of Corporate Services.
 - Clients and other stakeholders should report violations of this code to the Head of HR or Director of Corporate Services.
- Investigation and Action
 - Reports will be investigated promptly and fairly through BIM's Human Resource procedures.
- Violations may result in disciplinary action, up to and including dismissal, in line with the organisation's disciplinary policy.
- Protection Against Retaliation
 - BIM will not tolerate retaliation against employees who report violations in good faith. If anyone seeks advice or reports on a matter in relation to this Code it will be dealt with confidentially.
 - Employees are encouraged to familiarise themselves with policies such as the Grievance Procedure and Protected Disclosure Policy for raising concerns.

Code of Conduct for BIM

The Code of Conduct does not purport to explicitly provide for all situations which may arise but sets out the main elements of the Code including that employees should act in accordance with its overall ethical intent.

The BIM Code of Conduct requires that each employee:

- Conscientiously devote their full time, attention and abilities to their duties during working hours.
- Attend work as required and not absent themselves without proper basis and notification.
- Carry out their duties and functions diligently and in good faith to the full extent of their skill and knowledge, for the sole purpose for which said functions are authorised, in the best interests of BIM.
- Will act at all times to further the aims and objectives of BIM.
- May not at any time engage in, or be connected with, any outside business or activity which would in any way conflict with the interests of BIM, or be inconsistent with their official position, or tend to impair their ability to carry out their duties as public sector employees.
- Will adhere to workplace safety standards and protocols and report hazards immediately.
- Will not during their term of employment or thereafter disclose except as approved and required specifically in the discharge of their duties, any confidential information whatsoever relating to any person or company with which BIM is connected, or in relation to BIM or its subsidiaries, without the consent of BIM.
- Will not give interviews or speak to the press or media or publish books or articles about BIM or the business in which it is engaged without the specific consent of BIM
- Will not seek, accept or derive at any time during their employment with BIM or thereafter any unauthorised profit or benefit arising from the exercise of their functions, other than such remuneration or emoluments directly and properly payable by BIM
- Will not accept or engage in any other employment, directorship, lectureship, or other appointment of a business nature, unless specifically sanctioned by the Board or Chief Executive Officer, as the case may be.

The BIM Code of Conduct requires that each employee, Board Member and Sub-committee Member:

- Always acts in the best interest of BIM and the public, conducting themselves with honesty, impartiality and integrity
- Always act within the law and conform to the highest standards of business ethics.
- Will foster an inclusive environment that values diversity and will avoid discrimination, harassment, or bullying in any form.
- Be equitable and transparent in all business practices.
- Maintain appropriate records reflecting transparency in decision making.
- Respect the confidentiality of all personal or sensitive information held by BIM, either written or verbal, in documentation or discussions.
- Comply with all relevant statutory obligations(e.g. Data Protection legislation, Freedom of Information legislation).
- Endeavour to ensure the proper, effective, and efficient use of public money.
- Avoid giving or receiving corporate gifts, hospitality, preferential treatment, or benefits which might appear to affect the ability of the donor or the recipient to make independent judgement on business transactions and adhere to BIM's Hospitality and Entertainment Policy.
- Ensure impartial engagements through full compliance with BIM's Conflict of Interest Policy.
- Must never seek to use knowledge acquired in the performance of, or as a result of,
- their official duties to benefit themselves, or others with whom they have personal, family or other ties.
- Will make a full disclosure of any business or other significant outside interest, for the purpose of avoiding any conflict or potential conflict of interest in respect of their duties as employees and Board Members of BIM and, if relevant, a disclosure of the employments and business interests of their families or other persons or bodies connected with the employee, where there could be any possible conflict of interest.

BIM employees who, in the course of their official duties, come into contact with any

matter affecting any commercial undertaking in which they have an interest, must immediately disclose the nature and extent of that interest to their Line Manager and the Director of Corporate Services.

- Board members should not engage in any outside activity or employment that conflicts with the duties of their role in the state body.
- Employees will keep their Line Manager and the Director of Corporate Services advised of all relevant changes in their circumstances so as to ensure that these disclosures are up-to-date at all times.
- Any BIM employee (BIM Board and Sub-committee Members and Senior Executives) who holds a designated position under the Ethics in Public Office legislation must:
 - Furnish statements of registrable interests annual to the Standards in Public Office Commission (SIPO).
 - Avoid using their position for personal gain or preferential treatment of others.
 - If intending to be engaged in or connected with (i) any outside business with which he or she had official dealings or (ii) any outside business that might gain an unfair advantage over its competitors by employing him or her, must inform the Head of Human Resources or Director of Corporate Services of such an intention in order to consider any potential conflict of interest.
- BIM Employees, Board and Sub Committee Members will ensure that all of their activities are in accordance with the ethical intent implicit in these procedures, whether specifically covered or otherwise in this Code, and with any other rules, procedures or guidelines that may apply from time to time.

Framework and Policies that Underpin the Code

While employees are required to abide by all BIM Policies, the Code of Conduct policy is particularly underpinned by the following BIM policies.

[Dignity at Work Policy](#)

BIM is committed to provision of an environment for which upholds the dignity and respect of all BIM employees, contractors and agency workers and which supports the right to work in an environment which is free of any form of bullying, harassment, or sexual misconduct (including sexual harassment and sexual violence).

[Conflict of Interest Policy](#)

BIM is committed to maintaining the highest standards of conduct in all aspects of our activity. This policy aims to effectively manage potential conflicts of interest, be they real or perceived. It aims to support all those within the scope of the policy while also recognising the need to protect BIM against conflicts of interest that may be damaging to its activities and reputation.

[Hospitality and Entertainment Policy](#)

BIM seeks to ensure consistency and transparency in relation to expenditure on hospitality and entertainment, and to ensure appropriateness in the provision of hospitality and entertainment.

[Data Protection Policy](#)

BIM is committed to respect and protect the rights and privacy of all employees, contractors and agency workers in accordance with national privacy legislation and the GDPR. It is the responsibility of all BIM employees who process personal data on BIM's behalf to follow the provisions of the Data Protection Policy and to undertake the mandatory "Data Privacy & Security Training".

[Equality, Diversity and Inclusion Policies](#)

As part of BIM's continued commitment to equality, diversity and inclusion, BIM strives to create an environment in which all BIM employees, contractors and agency workers should expect to be able to thrive, be respected and have a real opportunity to participate in and contribute to BIM activities so that they can achieve their fullest potential.

[Information Transfer Policy](#)

Information is one of BIM's most important assets therefore, it is essential that it transfers information in a safe and secure way that is appropriate for the type of data being transferred. This policy is mandatory and sets out the responsibility each of us must ensure the security of this information.

[IT Access Control & User Access Management Policy](#)

BIM uses access controls to manage the admittance of users to its system and network resources; by granting users access only to the specific resources they require to complete their job-related duties. Protecting access to IT systems and applications is critical to maintaining the integrity of BIM's technology and data and prevent unauthorised access to such resources.

[BIM Corporate Safety Statement](#)

The Corporate Safety Statement aims to set out in writing BIM's commitment to organisation, management and resources for the Safety, Health and Welfare of all staff in the workplace. It does not in itself prevent accidents, but by stating the commitment to Safety and highlighting hazards in the workplace, it aims to improve awareness of Safety while at work.

[Disciplinary Policy](#)

BIM is committed to ensuring consistency and fair treatment for all employees, contractors and agency workers within BIM and has procedures in place to identify any issues of conduct, attendance or performance.

[Grievance Policy and Procedure](#)

BIM's Grievance Procedure provides a framework for dealing promptly and fairly with issues, in situations where employee, contractor and agency worker concerns and/or complaints have not been or cannot be resolved through the normal working relationship.

[Protected Disclosure Policy](#)

A protected disclosure relates to information that the employee reasonably believes shows one or more forms of misconduct or wrongdoing, typically relating to areas such as criminal offenses or failure to comply with legal obligations. The policy outlines detailed procedures for making disclosures regarding wrongdoing as set out in the Protected Disclosures Act 2014

Acknowledgment

This Code of Conduct policy ensures a clear understanding of the expectations and responsibilities of all members of the organisation, promoting a positive and ethical workplace culture.

All employees are required to read, understand, and adhere to this Code of Conduct.

By signing below, you acknowledge that you have read and understood the Code and agree to comply with its terms.

Employee Name: _____

Signature: _____

Date: _____

Contact Information

For any questions or concerns regarding this Code of Conduct, please contact the Human Resources Department or the Director of Corporate Services.

Reference Documents

BIM has developed this Code of Conduct pursuant to the requirements of the Ethics in Public Office Act, 1995 the Standards in Public Office Act 2001, the Standards in Public Office Commission and is pursuant to the Code of Practice for the Governance of State Bodies 2016.