

Regulator of National Lottery

Code of Business Conduct



Rialálaí an Chrannchuir Náisiúnta
Regulator of the National Lottery

Code of Business Conduct for Staff of the Office of the Regulator of the National Lottery

Introduction:

This Code of Business Conduct for staff members was prepared in compliance with the “Code of Practice for the Governance of State Bodies” issued by the department of Finance. The Code of Practice sets out the principles of corporate governance which State bodies are required to adopt.

Corporate governance comprises the systems and procedures by which the Office of the Regulator of the National Lottery is directed and controlled. In the interests of transparency and accountability, it is important that as a State Body, the Office of the Regulator of the National Lottery should operate to the highest standards.

It is noted that where the provisions in the National Lottery Act 2013 (the Act) govern matters which are also the subject of The Code of Practice for the Governance of State Bodies, such matters will continue to be governed by the Act.

The Code of Practice requires that all State bodies should have a written “Code of Business Conduct for all directors and employees of state bodies”

This Code of Conduct for staff of the Office of the Regulator of the National Lottery takes into account the provisions of the following Acts:

- The National Lottery Act 2013
- Ethics in Public Office Acts, 1995 to 2001
- Standards in Public Office Act, 2001
- Freedom of Information Acts, 1997 to 2014
- Data Protection Acts, 1998 to 2003
- Safety, Health and Welfare Act, 1989 to 2005
- Employment Equality Act 1998 and Equal Status Act 2004

The office of the Regulator of the National Lottery (“the Office”) is dedicated to performing its functions to the highest standards of business conduct. This Code has been created to inform staff members of their duties, rights and obligations in relation to the Office, its stakeholders, the public, other public agencies, contractors and other service providers or traders. The Code is mandatory and as such requires compliance by each staff member. It is necessary that staff become familiar with this document as the performance and standards of the service provided by the Office will be determined by the dedication and contribution of each individual staff member.

The Code of Conduct is a description of the procedures which determine the conduct and behaviour of staff members. The Code of Conduct outlines the principles of integrity, obligations, loyalty, fairness, responsibility and confidentiality in respect of all of the Office of the Regulator of the National Lottery’s business.

Objectives

The objectives of the Code are to establish an agreed set of ethical principles guiding the Office of the Regulator of the National Lottery in its work, for the benefit of staff; to ensure that they meet or exceed the standards of public service performance required by statute.

The main objectives of the Code of Conduct are as follows:

- the establishment of appropriate ethical principles for all staff members
- the promotion and maintenance of confidence and trust in the Office of the Regulator of the National Lottery
- the prevention of the development or acceptance of unethical practices and;
- ensuring that the Office of the Regulator of the National Lottery's business is conducted in such a manner that the integrity of the Office is reflected in the service provided to the public.

The Office of the Regulator of the National Lottery values its staff and is committed to ensuring that each individual has a working environment which reflects that individual's right to be treated with dignity and respect. The Office in turn expects staff to behave in a manner both professionally and personally which reflects positively on the Office of the Regulator of the National Lottery.

The Office will not accept discrimination of any kind including, sex, marital status, family status, age, sexual orientation, disability, race, creed or membership of the travelling community. The Office will not accept bullying or harassment of any kind in the workplace. All individuals associated with the Office must avoid any conduct in the work place which amounts to racial, religious, sexual discrimination or harassment of any kind whatsoever.

The staff of the Office are designated individuals under the Ethics in Public Office Acts, 1995 and 2001 and, as such, fulfil the obligations required under that legislation.

It is acknowledged that it is not possible to have a set of rules which will provide for all possible situations which may arise. Members and staff are expected to ensure that all of their activities are governed by ethical standards reflected in this Code.

Integrity

The Office is committed to performing its functions with integrity. Integrity entails moral uprightness and honesty in exercising sound judgement. It is essential that staff of the Office conduct themselves and are seen to conduct themselves and all of their activities to the highest possible standard.

This includes:

- Disclosure of outside employment/business interests in conflict or in potential conflict with the business of the Office;
- Avoidance by staff of outside employment business interests in conflict or potential conflict with the business of the Office;

- Avoidance of the giving or receiving of corporate gifts, hospitality, preferential treatment or benefits which might affect or appear to effect the ability of the donor or the recipient to make independent judgements on business transactions;
- Commitment to carry out the Office functions energetically but ethically and honestly;
- Conduct of purchasing activities of goods and services in accordance with best business practice;
- Ensuring that the Office's Annual Report and Accounts accurately reflect its business performance and are not misleading or designed to be misleading;
- Avoidance of the use of the Office's resources or time for personal gain or for the benefit of persons or organisations unconnected with the Office or its activities;
- Maintaining the confidentiality of any restricted or confidential information and not using such information for personal gain or abuse of one's position in anyway;
- Drawing only official remuneration in respect of official activities;
- To ensure a culture of claiming expenses only as appropriate to business needs and in accordance with good practice in the public sector generally;
- Commitment to act in the best interests of the Office in all dealings with other organisations.

Staff of the Office are required to file a declaration of interests with the Corporate Affairs Manager and to ensure that this declaration is updated annually or as may be deemed necessary.

Information/Confidentiality

The Office is dedicated to maintaining, respecting and protecting the privacy of the Office's activities. This includes:

- support by staff of the Office for the provision of access by the Office to general information relating to its activities in a manner which is open and which enhances its accountability to the general public.
- avoidance of the use of the Office'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;
- commitment not to acquire information or business secrets by improper means;
- respecting the confidentiality of sensitive information held by the Office which would include such material as;
 - ® commercially sensitive information
 - ® personal information; and
 - ® information received in confidence by the Office
- observe appropriate consultation procedures with third parties where, exceptionally, it is proposed to release sensitive information in the public interest; and
- comply with relevant statutory provisions (e.g. Freedom of Information legislation, Data Protection legislation etc.)

Obligations

The Office is dedicated to fulfilling its obligations under all requisite legislation which includes:

- fulfilling all regulatory and statutory obligations imposed on the Office
- complying with tendering obligations imposed on the Office
- introducing any controls to prevent fraud including adequate controls to ensure compliance with prescribed procedures in relation to claiming for expenses for business travel;
- conformity with procedures laid down by the Office in relation to conflict of interest situations, including in regard to acceptance of positions following employment and/or engagement by the Office bearing in mind potential conflicts of interest and confidentiality concerns; and
- acknowledging the duty of all to conform to highest standards of business ethics.

The Vision, Mission and Values of the Office

The Office was established as an independent regulator for the holding of the National Lottery in Ireland. In order to fulfil this role the Office developed its work plan to include a “Vision”, “Mission” and “Values”.

The Vision of the Office

The vision of the Office is

“Ensuring that there continues to be a properly run, sustainable and safe National Lottery and, that subject to these requirements, funds allocated to good causes are maximised”.

The Mission of the Office

The mission of the Office is:

“To achieve its vision by”

- monitoring and enforcing compliance in accordance with the statutory obligations under the National Lottery Act 2013
- Overseeing the operator’s activities and assessing compliance of the operator with the Licence
- Reviewing and, where appropriate, approving aspects of the operator’s operations including lottery games
- Managing and administering the National Lottery Fund

The Values of the Office

The Office has adopted values to apply in its activities. The values of the Office are to:

- maintain its independence
- act always with impartiality and integrity
- work in a professional and effective way
- meet its unique challenges and be innovative in its approach
- maintain transparency in all its work and
- value its people

The Office acknowledges the importance of its vision, mission and values in maintaining high standards and quality provision of service.

Loyalty

The Office is dedicated to carrying out its functions. Loyalty to the Office and its activities includes:

- the responsibility to be loyal to the Office and fully committed in all its business activities
- protecting the good name and reputation of the Office and
- acknowledging the duties of all to conform to the highest standards of business ethics

Fairness

The Office is dedicated to applying principles of fairness in all of its dealing with includes:

- compliance with employment equality and equal status legislation;
- a commitment to fairness in all business dealings; and
- valuing its clients/customers and treating all equally

Work/External Environment

The Office is dedicated to:

- placing the highest priority on promoting and preserving the health and safety of staff members; and
- ensuring that community concerns are fully considered;
- minimise any detrimental impact of the operations on the environment

Responsibility

The Office is responsible for:

- circulation of this Code of Business Conduct and a policy document on disclosure of interests to staff members for their attention
- acknowledging receipt and understanding of same; and
- providing guidance and direction on such areas as gifts and entertainment and on other ethical considerations which arise routinely.

Review

The Office is committed to reviewing the Code as appropriate.