



Rialálaí an Chrannchuir Náisiúnta
Regulator of the National Lottery

TITLE: CODE OF BUSINESS CONDUCT

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Code of Business Conduct

Introduction:

This Code of Business Conduct for staff members was prepared in compliance with the “Code of Practice for the Governance of State Bodies 2016” issued by the Department of Public Expenditure and Reform. 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 (ORNL) is directed and controlled. In the interests of transparency and accountability, it is important that as a State Body, the ORNL 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 ORNL takes into account the provisions of the followings:

- 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, 1988 to 2018
- General Data Protection Regulations
- Safety, Health and Welfare Act, 1989 to 2005
- Employment Equality Act, 1998 and Equal Status Act, 2000 to 2018

The (ORNL) 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 ORNL, 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 ORNL 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 the ORNL’s business.

Objectives

The objectives of the Code are to establish an agreed set of ethical principles guiding the ORNL 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 public service that it provides.

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

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

The staff of the ORNL are designated individuals under the Ethics in Public Office Acts, 1995 and 2001 and, as such, must 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 their activities are governed by ethical standards reflected in this Code.

Integrity

The ORNL 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 ORNL conduct themselves and are seen to conduct themselves and all their activities to the highest possible standard. For this reason, staff of the ORNL are required to familiarise themselves with the various policies and procedures which are in place in the ORNL and to ensure that they keep abreast of any updates or changes to these policies and procedures as advised to them during the course of their work in the ORNL.

This includes:

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

- Avoidance of the giving or receiving of 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 judgements on business transactions;
- Commitment to carry out the ORNL functions energetically but ethically and honestly;
- Conducting of purchasing activities of goods and services in accordance with the policies and procedures of the ORNL;
- Ensuring that the ORNL'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 ORNL's resources or time for personal gain or for the benefit of persons or organisations unconnected with the ORNL 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 ORNL in all dealings with other organisations.

Staff of the ORNL in Designated Positions of Employment as set out by the Ethics in Public Office Acts are required to file a declaration of interest statement with the Corporate Affairs Manager and to ensure that this declaration is updated annually or as may be deemed necessary.

Information/Confidentiality

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

- support by staff of the ORNL for the provision of access by the ORNL to general information relating to its activities in a manner which is open, and which enhances its accountability to the general public.
- commitment not to acquire information or business secrets by improper means;
- respecting the confidentiality of sensitive information held by the ORNL which would include such material as;
 - commercially sensitive information
 - personal information; and
 - information received in confidence by the ORNL
- 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, General Data Protection Regulations etc.)

Obligations

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

- fulfilling all regulatory and statutory obligations imposed on the ORNL
- complying with procurement obligations imposed on the ORNL
- 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 ORNL in relation to conflict-of-interest situations, including in regard to acceptance of positions following employment and/or engagement by the ORNL 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, Values, and Strategic Goals of the ORNL

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

The Vision of the ORNL

The vision of the ORNL is

“A safe, sustainable, properly run lottery maximising returns for good causes”.

The Mission of the ORNL

The mission of the ORNL is to achieve its vision by:

- Overseeing the operations of the National Lottery and enforcing compliance as required
- Considering proposals from the Operator and approving them as appropriate
- Managing and controlling the National Lottery Fund
- Exercising the enforcement rights of trademarks of the National Lottery
- Ensuring best practice in governance is adopted in the management and governance of the Office

The Values of the ORNL

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

- **Guardianship** - acting in the public interest with integrity
- **Independence** - being objective and impartial
- **Transparency** - in our decision making and communication
- **Accountability** - holding ourselves and others to account
- **Professionalism** - consistent high standards of conduct, competence, and courtesy
- **Valuing our People** - respecting and supporting our people
- **Future Focused** - innovating and applying evolving knowledge, skills, and experience

The Strategic Objectives of the ORNL

The Strategic Objectives listed below are not in any priority order and are strongly interdependent.

- **Strategic Goal 1:** The National Lottery is run with all due propriety
- **Strategic Goal 2:** The interests of participants are protected
- **Strategic Goal 3:** The long-term sustainability of the National Lottery is safeguarded
- **Strategic Goal 4:** Funds for good causes are maximised (subject to goals 2, 3 and 4)
- **Strategic Goal 5:** Governance of the ORNL achieves best practice and value for money

The ORNL applies its vision, mission, values, and strategic objectives in maintaining high standards and quality provision of service.

Fidelity

The ORNL is dedicated to carrying out its functions. Fidelity to the ORNL and its activities includes:

- the responsibility to be loyal to the ORNL and fully committed in all its business activities
- protecting the good name and reputation of the ORNL, and
- acknowledging the duties of all to conform to the highest standards of business ethics, including any professional code of ethics applicable to staff who are members of a recognised professional body.

For the avoidance of doubt, loyalty to the ORNL's functions and good name is not achieved by breaching a professional code of ethics or public sector rules to achieve a business goal.

Fairness

The ORNL 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 ORNL 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;
- minimising any detrimental impact of the operations on the environment

Responsibility

The ORNL 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 by its staff and
- providing guidance and direction on such areas as gifts and entertainment and on other ethical considerations which arise routinely.

Review

The ORNL is committed to reviewing the Code as appropriate.