

Distribution List: All staff

Title of Policy:

**Code of Professional Standards and
Behaviour for Employees**



**DUBLIN DENTAL
UNIVERSITY HOSPITAL**

OSPIDÉAL DÉADACH
OLLSCOILE ÁTHA CLIATH

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Date Recommended: Executive Team 17 th May 2016		Implementation Date: 18 th May 2016
Final approval by : Executive Team 18 th May 2016		Next Review Date: May 2023
Document No: CG -M - 22	Version/Edition No: 11.0	No. Of Pages: 8

Policy Update/Revision Tracker Form		
Date	Revision Number	Items removed/replaced/added/amended
Aug 2013	4.0	Re-formatted and updating to include the requirements of Code of Practice for the Governance of State Bodies 2009
Feb 2014	5.0	Inclusion of Circular 21/2009 Recommendation 4 re: Breach of Procedure (section 6.7)
Nov 2015	6.2	Incorporation of feedback Incorporation of guidance on receiving gifts following internal auditors' recommendation
Feb 2016	6.3	Section 6.3 and 6.6 updated incorporating best practice
May 2017	7.0	Update to include reference to 2016 Code of Practice for the Governance of State Bodies and DDUH Protected Disclosure Policy.
May 2019	8.0	Update to include reference to General Data Protection Regulations (GDPR) and DDUH Data Protection Policies.
May 2021	9.0	Updated following review from Audit & Risk Committee to remove 6.4 and move ethics bullet point to 6.3. Section 6.5 amended for escalating non-compliance.
Sep 2021	10.0	Following Audit & Risk Committee review, section 6.3 bullet 4 and 5 update to replace "Avoid" with "Not".
May 2022	11.0	Reviewed by Audit & Risk Committee with no proposed changes.

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1.0 Policy Statement

The Code of Practice for the Governance of State Bodies (2009 and update of 2016) makes provision for a Code of Professional Standards and Behaviour for Staff.

Under the Code of Practice, the Chairperson of the Board is required each year to confirm to the Minister for Health that appropriate procedures and controls are in place in the Dublin Dental University Hospital (DDUH). This includes confirmation that a Code of Professional Standards and Behaviour for Staff is in place and is being adhered to.

2.0 Policy Purpose

The purpose of this Code of Professional Standards and Behaviour is to:

- Assist the DDUH in the provision of a professional and effective service to our patients/students/clients/stakeholders
- Establish an agreed framework of good practice and ethics in our conduct
- Promote and maintain confidence and trust
- Prevent the development or acceptance of unethical practices
- Meet our requirements under the Code of Practice for the Governance of State Bodies (2009 and update of 2016). The framework for the code is as suggested in Appendix 1.1 of the Code of Practice for the Governance of State Bodies 2009.

3.0 Scope of Policy

All employees of the DDUH to include students.

4.0 Responsibilities

The CEO/Executive Team will:

- Prepare the Code of Professional Standards and Behaviour via a participative approach
- Circulate this Code to all staff of DDUH for their retention
- Provide practical guidance and direction on such areas as gifts and on other ethical considerations which arise routinely (see guidance note regarding gifts in Appendix 1)
- Circulate the document to the Board for approval.

Staff will:

- Make themselves aware of this Code and the guiding principles and obligations identified in sections 6.0 and 9.0 below
- Ensure that their activities are governed by the ethical considerations implicit in the Code.

5.0 Definition

CEO	Chief Executive Officer
DDUH	Dublin Dental University Hospital
FOI	Freedom of Information

6.0 Policy

All DDUH staff should observe the highest standards of honesty, integrity and professionalism.

All staff work in partnership and, mindful of this, will abide by the following guiding principles and obligations:

6.1 Fairness

Staff will:

- Commit to fairness in all dealings
- Value other staff/patients/students/clients/stakeholders and treat all equally
- Treat staff, colleagues and the public with dignity and respect
- Comply with the Dignity at Work Policy for the Health Service
- Comply with the principles of the Equal Opportunities & Diversity Policy and Strategy Objectives for the Health Service.

6.2 Work Environment

Staff will:

- Protect the assets of the organisation
- Place highest priority on promoting and preserving the health and safety of fellow staff members, students and patients
- Ensure that any community concerns are fully considered
- Minimise any detrimental impact of the operations on the environment.

6.3 Integrity

Staff will:

- Conduct purchasing activities of goods and/or services in accordance with national, European and DDUH procurement procedures.
- Ensure that DDUH accounts/reports accurately reflect performance and are not misleading or designed to be misleading.
- Not be involved in outside employment/ interests that are in conflict or in potential conflict with the interests of the DDUH.
- Not give or receive 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 judgment on transactions.
- Not use DDUH resources or time for personal gain or for the benefit of persons/organisations unconnected with DDUH or its activities.
- Not acquire information by improper means.
- Each staff member holding a designated position of employment within the DDUH needs to ensure his/her compliance with relevant provisions of the Ethics and Public Office Act 1995 and the Standards in Public Office Act 2001.
- Carry out duties in a party political neutral manner. Public political activities should not, under any circumstances, be undertaken while undertaking services for the DDUH
- Ensure that views or actions taken related to public political activities are not presented or interpreted as official comment on behalf of DDUH.

- Conform to the highest standards of ethics, including medical and dental ethics.

6.4 Information

Staff will:

- Facilitate access to general information relating to the DDUH in a way that enhances accountability to the general public subject to data protection and FOI regulations
- Respect the confidentiality of sensitive information held by the DDUH. This includes material such as:
 - patient and student records and all associated documents
 - other personal information
 - commercially sensitive information (including but not limited to future plans or details of major organisational or other changes such as restructuring)
 - information received in confidence
- Safeguard the records and information
- Observe appropriate prior consultation procedures with third parties where, exceptionally, it is proposed to release sensitive information in the public interest

Note: Where queries arise in relation to the release of information under the provisions of the Freedom of Information Acts, these should be directed to the Freedom of Information Officer at 612 7311 or by e-mail to foi@dental.tcd.ie.

6.5 Compliance with Obligations

Staff will:

- Endeavour to fulfil all regulatory and statutory obligations imposed on the DDUH; these obligations will be communicated through the management structure and communications tools
- Comply with professional codes of conduct and behaviour (e.g. Professional Behaviour and Dental Ethics for Dentists; Ethics and Conduct for Dental Nurses)
- Comply with detailed tendering and purchasing procedures as well as complying with prescribed levels of authority for sanctioning any relevant expenditure
- Ensure that there are adequate controls in place to prevent fraud including controls to ensure compliance with prescribed procedures in relation to claiming of expenses for approved travel.
- Report to the employer (DDUH) if they are convicted of criminal offences, or given the benefit of the Probation Act when tried for a criminal offence. The employee must make such a report to his/her supervisor (who, in turn, will advise the Head of Human Resources) or report directly to the Head of Human Resources.
- All instances of non-compliance will be dealt with through the DDUH HR Policies and Procedures

6.6 Breach of Procedure

In cases where an audit investigation is initiated and where there is *prima facie* evidence of a material breach of procedures and a risk of further loss, the need to adhere to fair procedures in the investigation of wrongdoing can still be achieved whilst removing the individual implicated in the wrongdoing to another area, by suspending them from the workplace or by putting additional controls in place. Such steps should be taken without prejudice and in the interest of protecting

both the individual that the allegation is made against and the organisation which must be protected from the risk of further loss.

7.0 Implementation Plan

A copy of this Code will be presented to each staff member on his/her commencement with the Hospital for their retention.

Any updates will be circulated to all employees once approved.

An electronic copy of this policy will be accessible at all times via Q-pulse, the information management system within the Hospital.

8.0 References / Bibliography

- Code of Practice for the Governance of State Bodies 2016
- HSE Dignity at Work Policy
- DDUH Protected Disclosure Policy
- DDUH Confidentiality Policy
- DDUH Anti-Fraud Policy
- Dental Council Professional Behaviour and Ethical Conduct (February 2012)
- Dental Council Ethics and Conduct for Dental Nurses
- DDUH Procurement and tendering documents
- Freedom of Information Act 2014
- General Data Protection Regulations (GDPR) May 2018
- DDUH Data Protection Policies
- Ethics in Public Office Act 1995
- Standards in Public Office Act 2001

9.0 Appendices

Appendix 1

Guidance note regarding gifts

An employee or any member of their family should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

For the avoidance of doubt, nominal gifts with a value of less than €20 can be accepted. However, if an excessive gift or hospitality is put forward, then the relevant line manager will consider the circumstances and agree how to deal with it e.g. a gift can be returned or steps can be taken to ensure that the acceptance of hospitality does not influence a decision or situation in favour of the giver.

If excessive gift(s) or hospitality are accepted or are found to have influenced decisions inappropriately, against DDUH policy (or potentially illegally), then the disciplinary procedure will be invoked.