

Code of Conduct

for the Board Members and Employees

Revision History

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The Educational Research Centre (ERC) has developed this Code of Conduct pursuant to the requirements of the Code of practice for the Governance of State Bodies 2016, the provisions of the Ethics in Public Office Act 1995, the Standards in Public Office Act 2001 and the principles of good governance.

1. Intent and Scope

The ERC is shaped by a set of values which guide the work of the Board and Board Committee members, CEO and employees of the ERC.

Quality - We are committed to excellence. We ensure that our research is thorough, accurate, and reliable.

Impact - We aim to make a real difference with our research. We want our work to support policy makers and inform public debate.

Independence - We conduct research and report findings with integrity, impartiality, and without undue influence, ensuring the credibility and trustworthiness of our work.

Respect - We value different perspectives, cultures and backgrounds, and treat everyone with dignity, kindness and consideration in an inclusive and respectful environment.

Teamwork - We collaborate with others, fostering a culture of open communication and mutual support in our work.

Corporate governance comprises the systems and procedures by which an organisation is directed and managed.

The ERC, as a public body and an employer, acknowledges that it has a duty to serve the interests of the taxpayer, pursue value for money in its endeavours (including managing risk appropriately), and act with integrity, loyalty and fairness, ensuring transparency and maintaining a high level of public confidence.

The Code of Conduct sets down the general principles and ethical standards which govern the professional activities and conduct of Applicable Individuals Staff of the ERC, promote and maintain trust and confidence, and prevent unacceptable ethical and behavioural practices.

The purpose of the code is to:

- Establish and agree a set of ethical principles for staff;
- Offer guidance on expected behaviours and what actions are acceptable or unacceptable;
- Promote and maintain confidence and trust in the ERC;
- Prevent the development of unethical practices.

The provisions of the Code of Conduct are ancillary to the requirements set out in the Code of Practice for the Governance of State Bodies 2016, and any other relevant legislative and regulatory requirements and form part of the Terms and Conditions of Employment for all staff. The code should be read in conjunction with contracts of employment, where relevant, ethical standards required by professional bodies for affiliated employees and relevant internal policies and Terms of Reference (e.g. Board and ARC).

Staff have an obligation to comply with policies and procedures, staff regulations, Work, Rules and any standards and codes of practice adopted by the ERC. This Code of Conduct is binding on all staff (including those on leave, career breaks, etc.).

For the purpose of clarity, where the distinction is not clearly made, the term ‘Staff’ refers to Employees of the ERC (namely a person who has entered into or works under a contract of employment including permanent, fixed and specified purpose contract, casual workers and trainees including the CEO).

The terms of this policy also applies to Board and Board Committee members, consultants, service providers, contractors, volunteers, work experience and agency workers.

The individuals to whom this policy applies to, as referred above, are hereinafter referred to as “applicable individuals”.

2. General Principles

The Code of Conduct relates both to internal and external activities of the ERC.

Wherever we operate, we must ensure that our business is conducted and managed effectively, efficiently and objectively in the public interest, in a manner consistent with the highest professional standards of accountability and responsibility and in accordance with the law.

The ERC is committed to conducting its activity in accordance with its statutory remit and all relevant legislation in observance of three fundamental principles of Integrity, Loyalty and Fairness.

We recognise that it is not possible to anticipate every situation and that is why it is important to follow the letter of the Code of Conduct but also its spirit. Decision making should be aligned with ERC values, especially as regards ethical problems and conflict of interests.

Any violation of the code may result in disciplinary action up to and including termination of employment or legal action and liability.

3. Conflict of interests and disclosures

A conflict of interest can arise when someone has personal interests or loyalties which could be, or could be seen to be, at odds with the interests of the ERC and cause a risk of interfering with an Employee's ability to make an unbiased decision for the organisation.

A personal interest can be direct or indirect and can include the interest of parties connected to them or to people and companies linked to them. E.g. family member with interest in a company which provide services to the ERC).

- The Terms of Reference for Board and Board Committees outline the process for disclosure of interests by Board and Board Committee members.
- Conflict of interests from Staff should be reported to the CEO in writing.
- Where the CEO has a conflict of interest it should be reported to the Chair of the Board.

Anyone who has disclosed an interest should:

- not influence nor seek to influence a decision to be made in relation to the matter;
- not make any recommendations in relation to the matter, contract, agreement or arrangement;
- absent themselves from meetings or part of meetings during which the matter is being discussed;
- take no part in any deliberation relating to the matter;
- not vote on a decision relating to the matter;
- not retain information or materials with respect to the matter.

If an Applicable Individual has a doubt as to whether this Code requires the disclosure of an interest of their own or of a connected person, they should consult the CEO or Chairperson as appropriate.

Employees should not be involved in outside employment/business interests in conflict, or in potential conflict, with the work or business of the ERC.

Employees who are at any time involved in employment (including consultancy and contract work undertaken outside of their ERC employment) and/or running of any business outside of the ERC must inform the CEO or Chairperson (as appropriate) at soon as possible. This includes employees seeking membership of state Boards.

Where a post-employment conflict of interest arises (e.g. taking up an engagement resulting in a conflict of interest), an employee or former employer should consult with the CEO or Chairperson (as appropriate).

[Staff, Board and Committee Members have a duty of confidentiality on the matter which survives termination of employment or appointment.]

Confidential disclosures: The Board has put in place procedures whereby employees may, in confidence, raise concerns about possible irregularities in

financial reporting or other matters and for ensuring meaningful follow up of matters raised in this way (ref: Protected Disclosure Policy)

1. Integrity, Loyalty and Business Ethics¹

Anyone to whom this code applies to should hold themselves to the highest ethical standards and carry ERC business in an honest and ethical manner.

The ERC values transparency and everyone must adhere to those standards when conducting any ERC business and conduct themselves in an ethical, honest and lawful manner in their interactions with public officials both within Ireland and internationally.

Staff, Board and Committee Members and/or their families should not participate in promotional offers or competitions where the benefits of these are not available to Staff in general or to the general public.

Applicable persons should:

- not use ERC time or resources for personal gain or use their position in the ERC to gain personal advantages.
- should claim expenses only as appropriate to ERC business requirements and in accordance with the Expense Policy.
- ensure that ERC Financial Statements, accounts and reports are accurate and not misleading.
- never offer or accept a bribe and must not support corrupt or illegal activities.

Staff, Board and Committee members should be familiar with policies and procedures in place to prevent fraud, bribery and corruption.

In accordance with the One Person One Salary (OPOS) rule, an employee may not be paid board fees for sitting on the boards of any other state funded bodies or receive any additional payment for conducting other work of any kind for another public body.

¹ As of November 2025, the ERC does not fall under the Lobbying Act.

Applicable Individuals should avoid bringing the ERC into disrepute, including through inappropriate online interactions (e.g. social media) – (Ref Social media usage policy) and should uphold the high standard of behaviour expected in the workplace at any events related to the ERC (e.g. social events).

Applicable Individuals should refrain from providing feedback on any media related queries or contractors prior to consultation with the Management Team.

Employment references for employees or former employees can only be given by HR who will consult line managers.

Employees acknowledge the responsibility to be loyal to the ERC and to be fully committed in all its business activities while mindful that the ERC must at all times take into account the interests of its stakeholders.

2. Transparency, Information Sharing, Retention and Confidentiality

Employees of the ERC support the provision of access to general information relating to the ERC's activities in a way that is open and enhances its accountability to the general public.

The ERC respects the confidentiality of sensitive information it holds and complies with relevant statutory provisions (e.g. Data Protection and Freedom of Information legislation). Unauthorised sharing, loss or misuse of confidential or proprietary information is prohibited.

The ERC observes appropriate prior consultation procedures with relevant third parties where, exceptionally, it is proposed to release confidential or sensitive information in the public interest.

Confidential information must never be shared without explicit authorisation, especially when it relates to competitive matters (including supplier and tender information), contracts, personal data or information received in confidence.

Engaged consultants should sign a confidentiality agreement.

ERC data and equipment is the property of the ERC and can be monitored to ensure policy compliance.

Employees should follow IT policies when using ERC devices and networks.

Upon leaving the ERC, former employees (including employees on career break) should return and/or dispose of documentation obtained during their employment in the ERC. Board members should return any ERC documentation in their possession to the Board Secretary or otherwise indicate that such documentation in their possession has been disposed of in an appropriate manner.

Obligations relating to the non-disclosure of information survives the termination of a post² in the ERC.

3. Fairness and Behavioural standards

The ERC is committed to fairness and due process in the conduct of its activities and especially undertakes to:

- Comply with employment equality and equal status legislation;
- Commit to fairness in all business dealings;
- Value customers and treat all customers equally.

The ERC is committed to ensuring that fundamental human rights are respected in its business activities and expects to conduct its business in compliance with applicable laws.

The ERC values the diversity of all its stakeholders and supports equal opportunities. ERC Staff should be reflective of a wide range of experiences and

² For the purpose of clarity, 'post' refers to posts assigned to employees of the ERC, CEO, Board members and Board Committee Members. It also includes staff working in the ERC through an agency.

perspectives, and the ERC is committed to creating an inclusive environment where everyone is treated with fairness and respect.

The ERC stands against any form of discrimination and harassment (including sexual harassment).

Staff are expected to value their colleagues and to treat all stakeholders with fairness, equality, dignity and respect.

Any infringements of human rights should be reported immediately.

4. Gifts and Hospitality

Employees who have designated positions must adhere to disclosure requirements under the Ethics in Public Office Acts 1995 and 2001.

Giving or receiving 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 be avoided.

As such, gifts and hospitality are neither sought nor encouraged by the ERC and in case of acceptance of same the following applies:

- all offers of hospitality and gifts, as well as their acceptance where relevant, must be recorded (except for low value hospitality items and small gifts or industry events for training or professional development);
- the acceptance and receipt of hospitality and gifts from an applicant for a contract or for funding are prohibited;
- the offer or giving of hospitality and gifts by an applicant for a contract or for funding may disqualify the application.

The ERC does not provide corporate gifts, hospitality (other than normal business courtesy), preferential treatment or benefits to suppliers or to any party with which it conducts business.

Exceptionally, the ERC may organise promotional offers for teachers and students to encourage participation in studies. On such occasion the ERC will be mindful of fairness and equal opportunity. The prizes may exceed €50. However, the value should not be excessive.

Permitted gifts and hospitality

Acceptance of gifts and/or hospitality, appropriate in context, by Applicable Individuals is limited to the following:

- Working lunches or refreshments provided during a business event.
- Hospitality offered to ERC staff during a seminar, conference or other event, so long as the same hospitality is offered to all attendees.
- Incidental hospitality during sponsored events.
- Attendance at workshops, seminars and talks if attendance for all is free.
- Publications offered free of charge to clients or industry participants.
- Unsolicited items of a value of no more than €75 or branded materials of a token value.
- Seasonal or other gifts accepted on behalf of all ERC employees.

Prohibited gifts and benefits

The following should not be offered to nor be accepted by Applicable Individuals:

- Cash.
- Any gifts or hospitality from an applicant for a contract or funding, for as long as their application remains to be considered.
- Any overnight stay in any hotel or accommodation (unless it is offered for participation as a speaker at a conference) or travel outside Ireland.
- Sports equipment, electronic devices, musical instruments, furniture.
- Advantageous terms and conditions for the supply of goods and services from any supplier of goods and services to the ERC.

Non declaration of a gift may lead to disciplinary action.

In the event of an Applicable Individual accepting a prohibited gift, they will be precluded from any involvement in any process involving the giver of the gift, until such time as that process has concluded.

Employees uncertain about whether they can accept a gift should consult with the Governance and Compliance Section.

In cases where the ERC hosts international meetings, different rules may apply, to be agreed by the Board.

5. Raising Concerns

Staff who have queries about the application of this code should raise their queries with the Governance Section.

Staff who witness conduct that does not align with this code of conduct should first discuss the matter with their line manager.

6. Responsibilities and circulation of information

This code was adopted by the Board on 9 December 2025.

A copy of the code is available on the ERC website www.erc.ie.

The ERC has mechanisms in place to ensure up-to-date Codes of Conduct are brought to the attention of all Board members, management and employees.