



CODE OF CONDUCT/ETHICS POLICY AND PROCEDURE



Code of Ethics

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INTRODUCTION

The reputation of any organisation depends on the conduct and efficiency of its entire staff. Each of which has a responsibility to perform our duties within the limits of laid-down procedures and training. Actions outside these limits could have legal implications for our customers and us.

The highest standards of integrity are essential to merit the trust of customers and the respect of other parties and the public.

In C2-AI, integrity means being trusted to work efficiently without constant supervision and having high personal standards. These include appropriate conduct to customers, appropriate conduct to others, including colleagues and other C2-AI employees, a sense of responsibility, honesty, self-discipline, loyalty and self-presentation.

Our manners, conduct and actions represent and uphold the good name of C2-AI.

To help each one of us maintain these high standards, a Code of Conduct/Ethics has been written which will underpin the way we view our work and our role. It is designed to give guidance to individuals in their daily work and provide a framework for communication in any situation, which causes concern.

It is important that everyone is fully committed to this Code in order to eliminate any conflict of interest or area of uncertainty, thereby ensuring that we can all work effectively and openly to the benefit of customers and C2-AI.

The other internal policies currently in use within C2-AI will complement the content of this policy. Therefore, all staff should also refer to these documents for more detailed clarification on any ethical issues. Where doubt still exists, please refer to the CEO.

Other Procedures, i.e. Complaints, Grievance, and Disciplinary should be used as appropriate.



POLICY STATEMENT

Many of us are in daily contact, directly or indirectly, with members of the public, our customers and outside organisations. It is important that we should all reflect the highest standards of integrity and personal conduct in any matter, which involves C2-AI.

It is the intention of C2-AI that we should develop and maintain professionalism and integrity in all activities and dealings of C2-AI, while demonstrating concern and respect for the individual and organisation alike.

The following standards of conduct and procedures have been established to safeguard each member of staff, the patient, the client and the organisation.

RESPONSIBILITIES OF C2-AI

C2-AI is responsible for ensuring that it has a relevant and up to date Code of Conduct/Ethics, which is brought to the attention of all its employees and that procedures are put in place to ensure its effectiveness.

In addition, C2-AI is responsible for all staff being made aware of the consequences and warnings against corruption, favouritism and rewards in respect of the work carried out by staff of C2-AI in the course of their C2-AI work.

C2-AI must be impartial, open and honest in the conduct of their business. Its staff should remain beyond suspicion. It is the responsibility of C2-AI to ensure that it agrees and monitors proper and lawful principles of business conduct as well as principles of conduct for the individual.

To this end, C2-AI is responsible for:

- the identification and communication of relevant policies, practices and information;
- taking full account of the needs, pressures, and problems of others, both within the organisation and in their dealings with general public;
- reviewing the organisation's structures and procedures as to their suitability for achieving effective communication with all employees;
- ensuring that each member of C2-AI is aware of their responsibilities, areas of authority and accountability in their dealings with each other;
- awareness of the effects of the media/press and establishing a good working relationship to ensure that C2-AI is always presented correctly, as a professional, caring, organisation.
- responding positively to requests from the Public for information.
- registering Declarations of Interest.



C2-AI has a responsibility to ensure that the religious, spiritual and cultural beliefs of patients and staff are respected. It must endeavour to provide for these needs where possible, consulting local community and religious organisations if necessary.

RESPONSIBILITIES OF THE INDIVIDUAL

It is the responsibility of each person to ensure that you are not placed in a situation which risks, or appears to risk, conflict between your private interests and your C2-AI duties. This is primary responsibility applies to each person whether you commit C2-AI resources directly or indirectly.

As C2-AI staff, you are expected to:

- ensure that the interest of patient or customer remains paramount at all times;
- be impartial and honest in the conduct of your official business;
 - use C2-AI funds entrusted to you to the best advantage of the C2-AI, always ensuring true value for money;
 - declare all cases where a close relative or associate, has a controlling and/or significant financial interest in a business (including a private company, public sector organisation, and/or voluntary organisation), or in any other activity or pursuit, which may compete for any contract to supply either goods or services to the customers.
- declare any employment outside of C2-AI.

As C2-AI staff you are expected to NOT:

- abuse your official position for personal gain or to benefit your family or friends;
- seek to advantage or further private business or other interests in the course of your official duties;
- engage in outside employment which may conflict with your C2-AI work or be detrimental to it;
- seek or accept preferential rates or benefits in kind for private transactions carried out with companies which you have had, or may have official dealings on behalf of C2-AI (this does not apply to concessionary agreements negotiated with companies by C2-AI, or by recognised staff interests on behalf of all staff);
- accept gifts offered by contractors or other, e.g., at Christmas time. Gifts that may arrive are to be declared to management.
- accept hospitality or entertainment of a nature that C2-AI would not normally be likely to offer in return.

Under the Prevention of Corruption Acts, 1906 and 1916, it is an offence for any member of staff to:



- accept any inducement, reward, gift, money or consideration for doing, or refraining from doing anything, in his or her official capacity, or corruptly showing favour or disfavour in the handling of contracts

Offences under these Acts are liable to prosecution and may also lead to a loss of your employment rights.

As C2-AI staff you have an obligation to safeguard all confidential information which you have access and must ensure that it is not divulged to any unauthorised person or persons, including members of public, patients, or the media/press.

As C2-AI staff you must not divulge to any unauthorised person:

- information about individual patients or clients, which is under all circumstances confidential;
- information relating to individual staff records, details of contract prices and terms and to C2-AI in general;
- internal information of a “commercial-in-confidence” nature, where its disclosure would prejudice the principle of a purchasing system based on fair competition;
- information given in the Quality Manual System, Work Instructions or circulars which are confidential and restricted information.
- Work Instructions, circulars etc. without the written expressed permission of the Chief Executive.

Breaches of confidence will result in disciplinary action.

Each of should also be aware that, regardless of any disciplinary action taken, a breach of confidence could also result in a civil action for damages.

All C2-AI staff have a right and duty to raise with C2-AI any matters of concern they may have about C2-AI issues concerned with the delivery of care or services to a patient or client. The CEO may be approached at any time to discuss such issues.

Every C2-AI Manager has a duty to ensure that C2-AI staff are easily able to express their concerns through all levels of management and that staff concerns are dealt with thoroughly and fairly. Managers should take concerns seriously, consider them fully and sympathetically, and, where appropriate, seek advice from Senior Management, whilst recognising that raising a concern can be a difficult experience for some staff.

TRANSACTION OF BUSINESS

Fair and open competition between prospective contractors or suppliers for C2-AI contracts is a requirement of C2-AI. This means that:



no private, public or voluntary organisation or company may be given any advantage over its competitors. This applies to all potential competitors, whether or not there has been a previous relationship or contract;

- each new contract should be awarded solely on merit;
- no special favour should be shown to current/former employees, or their close relatives or associates in awarding contracts to businesses run by them or employing them. Care must be taken to ensure that the selection process is impartial and that employees who are known to have an interest play no part in the selection;
- any contractor, supplier or others seeking favoured treatment in consideration of any benefit or hospitality should be reported to the CEO.

All advertising should take place through controlled and approved procedures in order to protect C2-AI's current and future business interests and its' standard of integrity, i.e.

- recruitment advertising will take account of employment legislation and should promote C2-AI's positive images as an equal opportunities employer;
- business advertising will only be undertaken after due consideration. Any advertising of itself should be honest and in line with public expectation and patient care;
- business advertising of a third party or its product should be undertaken where the business complements the C2-AI's service and would be acceptable to patients, clients and the public.
- organisations using our name to raise advertising for their own purpose must be referred to the C2-AI board prior to any agreements being reached.

Any forms of sponsorship offered to C2-AI or its staff will only be accepted where considered ethical or relevant to the benefit of C2-AI and the customers it serves and provided that acceptance will not compromise purchasing decisions.

All staff of C2-AI must declare offers of sponsorship and seek permission from their manager in advance of acceptance or refusal.

Fund raising of a direct or indirect nature should never be detrimental to the main purpose of C2-AI, C2-AI's customers or its principles. In all cases, accurate records must be kept of funds raised and expenses incurred and on no account should staff be made to feel that they have to participate in such events.

Internal fund raising projects for C2-AI or for other charitable organisations include:

- all projects, activities (such as social events), raffles etc, either by C2-AI

Approval must be sought and obtained from senior management