

|   |                                       |   |  |
|---|---------------------------------------|---|--|
| <b>PROVIDER NAME:</b> CCT College Dublin (CCT)  |                                       |   |  |
| <b>POLICY AREA:</b> Standard 8: Quality Assurance of Teaching Staff & Human Resources   |                                       |   |  |
| <b>Policy and Procedure Title:</b>  | <i>CCTP803: Staff Code of Conduct</i> | <b>Policy Number:</b> CCTP803   | <b>Version:</b> 1.2  |
| <b>Policy Statement</b>   |                                       |   |  |
| <p>CCT esteems the primary values integrity, honesty and fairness, and strives to integrate these values into its teaching, research and business practices. Adherence to this Code will aid the College in promoting its reputation and commitment to ethical behaviour. This Code of Conduct takes account of the implications of the Ethics in Public Office Act, 1995 and the Standards in Public Office Act 2001, as well as the Qualifications and Quality Assurance (Education and Training) Act 2012 and Safety, Health and Welfare at Work Acts 1989 &amp; 2005.</p> <p>The policy is intended to make staff aware of the College's Code of Conduct, (related to the College policy on Conflict of Interest), which will serve to enhance the service delivery of the College and promote the reputation of the College and its staff. Employees of the College are expected to be conversant with this Code of Conduct and the requirements of College policies and procedures governing their conduct. The College will endeavour to promote, disseminate and ensure the implementation of this Code to employees.</p> |                                       |   |  |
| <b>Definitions and Principles</b>   |                                       |   |  |
| <p>The CCT Code of Conduct is a set of guidelines issued by the College to any employee, and management, on some of the more pertinent areas within educational institutions of the size, scale, and nature of CCT as an educational organisation. The Code exists to help CCT's staff to conduct their actions, in accordance with the primary values, ethical standards, and professional goals of the College.</p>   |                                       |   |  |
| <b>Staff Involved</b>   |                                       |   |  |
| All full time and part time staff, and all external examiners, and consultants employed by the College.   |                                       |   |  |
| <b>Procedure Outline / Method(s) used to carry out this procedure</b>   |                                       | <b>Responsibility of</b>  | <b>Evidence generated by this procedure to ensure its effectiveness</b>  |
| <p>In their performance of their duties, employees should endeavour to maintain high standards in service delivery, observe appropriate behaviour and maintain the highest standards of probity.</p> <p><b>1. Objectives</b></p> <p>1. The objectives of this code are:</p> <ol style="list-style-type: none"> <li>1.1. To set out an agreed set of ethical principles.</li> <li>1.2. To promote and maintain confidence and trust in the employees of CCT.</li> <li>1.3. To prevent the development or acceptance of unethical practices.</li> <li>1.4. To promote the highest legal, management, and ethical standards in all the activities of CCT.</li> </ol>   |                                       | <p>(Specific responsibility)<br/>ELT / Management Team</p> <p>(General responsibility)<br/>All staff</p> <p>(Specific responsibility)</p> | <p>Minutes of Academic Council, ELT or Management Team meetings, discussing any information on this policy</p> <p>Minutes of any CCT committee meetings, discussing any information on this sub-policy area</p> <p>Minutes of any CCT meetings with employees in relation to this area</p> |

|   |  |   |
|---|--|---|
| <p>1.5. To promote compliance with best current governance and management practice in all the activities of CCT.</p> <p>These objectives can be achieved through, adherence to the fundamental principles set out in this code.</p> <p><b>2. Integrity</b></p> <p>2.1 Employees are required to disclose to their line manager outside employment and/or personal business interests they have which may be in conflict with the business of the College, or may be perceived as such, or may place the College in breach of the EU Working Time Directive.</p> <p>2.2 Employees will not engage in any outside employment / business or activity, which conflicts with the interest of CCT, unless authorised by CCT.</p> <p>2.3 Employees will be committed to conducting the purchasing activity of any goods / services in accordance with College policy, and subject to CCT Line Manager approval, and College President or Dean for Administration and Finance (where necessary).</p> <p>2.4 Employees will be committed to ensuring that any procurement of or engagement with external consultants or other services, is conducted, subject to CCT Line Manager approval, and College President (where necessary).</p> <p>2.5 Employees will be committed to ensure that the accounts / reports of their area of responsibility within the College, accurately reflect the operating performance of the College and are not misleading or designed to be misleading</p> <p>2.6 Employees are required to avoid the unapproved use of the College's resources or time for personal gain or for the benefit of competitors.</p> <p>2.7 Employees should not acquire or use information or business secrets by improper means and authorised use of information must only be conducted in accordance with GDPR.</p> <p>2.8 Employees will not engage in any inappropriate personal and/or sexual relations with registered students, or any current stakeholder of the College, where a conflict of interest would clearly exist.</p> <p>2.9 Employees will not engage in any activity which solicits any business for personal gain to the employee, where a conflict of interest would clearly exist.</p> <p>2.10 Employees will not engage in any activity, paid or unpaid, that may call into question the academic integrity of CCT or its stakeholders. This includes but is not limited to the creation and uploading or dissemination of academic materials including via file sharing websites</p> | <p>Senior Management Team</p> <p>(General responsibility)</p> <p>All staff</p> <p>(Specific responsibility)</p> <p>Senior Management Team</p> <p>(General responsibility)</p> <p>All staff</p> | <p>Any evidence pertaining to procedures in this area</p> <p>Minutes of any CCT committee meetings, discussing any information on this sub-policy area</p> <p>Minutes of any CCT meetings with employees in relation to this area</p> <p>Any evidence pertaining to procedures in this area</p> <p>Employee Contracts</p> <p>Any reports on misconduct by employees</p> |
|---|--|---|

|   |   |   |
|---|---|---|
| <p><b>3. Duty of Care</b></p> <p>3.1 Employees will act responsibly and fairly with due care, diligence, loyalty, respect, and prudence of a reasonable individual whose duty of care is to CCT.</p> <p><b>4. Conduct as Employees</b></p> <p>4.1 Employees will treat each other and all members of the College community with courtesy, respect, and in line with CCT's policy on Equality. Employees will lead on and actively promote the College's policy on Equality, through their behaviour.</p> <p>4.2 Employees will use the resources of the College in a proper, effective and efficient manner and will take proper and reasonable care of College property, and will not knowingly use, or permit its use, for unauthorised purposes.</p> <p>4.3 Employees are required to attend work, perform their duties in a diligent and efficient manner and not absent themselves from duty without proper authorisation.</p> <p>4.4 Employees will ensure that expenses such as travel and subsistence payments are not unnecessarily incurred either by themselves or by staff reporting to them.</p> <p><b>5. Gifts and Hospitality</b></p> <p>5.1 All actions of employees in carrying out their official duties will be above suspicion and not give rise to any actual or potential conflict of interest, and their dealings with commercial and other interests will bear the closest possible scrutiny.</p> <p>5.2 The receipt of gifts and hospitality by employees from external individuals or organisations and from those with whom they have official dealings, will be governed by the highest standards. For the purposes of these provisions, the term “gift” includes any benefit which is given to an employee free of charge or at less than its commercial price.</p> <p>5.3 The exchange of official gifts (e.g. gifts exchanged with dignitaries and officials) to and from the College is acceptable and, in such circumstances, gifts received remain the property of the College. Receipt of business-related hospitality that constitutes normal courtesies in business and community relations (e.g. attendance at a community/civic/ cultural function) is acceptable. Employees may only accept personal gifts of a reasonable value.</p> <p>5.4 Employees will not accept cash, gift cheques or any vouchers that may be exchanged for cash regardless of the amount from external individuals or organisations.</p> <p>5.5 Employees will not solicit gifts or hospitality for personal gain.</p> | <p>(Specific responsibility)<br/>Senior Management Team</p> <p>(General responsibility)<br/>All staff</p> <p>(Specific responsibility)<br/>Senior Management Team</p> <p>(General responsibility)<br/>All staff</p> | <p>Minutes of any CCT committee meetings, discussing any information on this sub-policy area</p> <p>Minutes of any CCT meetings with employees in relation to this area</p> <p>Any evidence pertaining to procedures in this area<br/>Any reports on misconduct by employees in this area</p> <p>Minutes of any CCT committee meetings, discussing any information on this sub-policy area</p> <p>Minutes of any CCT meetings with employees in relation to this area</p> <p>Any evidence pertaining to procedures in this area<br/>Any reports on misconduct by employees in this area</p> |
|---|---|---|

|  |   |   |
|--|---|---|
| <p><b>6. Acquiring Goods and Services</b></p> <p>6.1 Employees will conduct purchasing activities of goods and services in accordance with College procurement policies and procedures, public policy and best business practice.</p> <p>6.2 Employees will not solicit contracts with CCT (including with students) for the supply of goods or services (other than for employment) either for their own benefit, or for any partnership or company with which they have an involvement in their private capacity, or on behalf of other persons or organisations.</p> <p>6.3 No purchase will be made from, and no sale made to, employees, or any partnership or company with which employees have an involvement in their private capacity, in respect of goods or services, unless prior sanction has been obtained from the line manager in which the transaction arises. The line manager will consult with the Dean for Administration and Finance.</p> <p>6.4 Employees will comply with prescribed levels of authority for the sanctioning of any relevant expenditure.</p> <p>6.5 Employees will not negotiate or arbitrate on any matter affecting CCT, or the purchase from, or sale of goods to the College where, in their private capacities, they are interested either as principals or as shareholders in a company so involved.</p> <p><b>7. Confidentiality / Use of Information</b></p> <p>7.1 Employees of the College are required to respect the confidentiality of sensitive information held by CCT. This would constitute material such as and in particular: a) personal information; b) information received in confidence by the College; c) any commercially sensitive information or other information sensitive to the reputation of the College. All such information must be handled in accordance with GDPR and College policy.</p> <p>7.2 Employees will observe appropriate prior consultation procedures with third parties where, exceptionally, it is proposed to release sensitive information in the public interest.</p> <p>7.3 Employees will ensure that appropriate care is taken to guarantee the security of sensitive information (in paper or electronic form) whether on or off Campus and will immediately report any breach to the Dean of Academic Affairs.</p> <p>7.4 Employees will ensure that confidential records are subject to appropriate access procedures.</p> | <p>(Specific responsibility)<br/>Senior Management Team</p> <p>(General responsibility)<br/>All staff</p> <p>(Specific responsibility)<br/>Senior Management Team</p> <p>(General responsibility)<br/>All staff</p> | <p>Minutes of any CCT committee meetings, discussing any information on this sub-policy area</p> <p>Minutes of any CCT meetings with employees in relation to this area</p> <p>Any evidence pertaining to procedures in this area</p> <p>Any reports on misconduct by employees in this area</p> <p>Minutes of any CCT committee meetings, discussing any information on this sub-policy area</p> <p>Minutes of any CCT meetings with employees in relation to this area</p> <p>Any evidence pertaining to procedures in this area</p> <p>Any reports on misconduct by employees in this area</p> |
|--|---|---|

|   |   |  |
|---|---|--|
| <p><b>8. Intellectual Property</b></p> <p>8.1 The College defines intellectual property as the tangible or intangible results of research, development, programme and module design, assessment materials, teaching, or other intellectual activity, which is manifested in the form of copyrights, patents, trademarks, industrial designs and confidential/proprietary information. Intellectual property allows creativity and innovation to be captured and owned in the same way as physical property can be owned. Intellectual property includes individually and collectively all technical innovations, inventions, improvements, and/or discoveries, information, writings and software, whether patentable or otherwise susceptible to intellectual property protection, including technology and materials in their tangible form.</p> <p>8.2 As a rule, the rights to CCT Intellectual Property is the property of and vests solely and absolutely in CCT. CCT Intellectual Property includes any intellectual property in any materials and/or inventions created by academic, research and other CCT staff (full-time or part-time) in the course of their employment or by higher education students during their education by CCT or by consultants or others in the course of research, development, teaching, consultancy and other intellectual activity carried out for CCT. The College is open to applications for joint intellectual property rights where a staff member or student wishes to make an application for such. The College will engage external professionals in considering such requests.</p> <p>8.3 College Intellectual Property includes rights in any material, including any copyright (including rights in computer software and moral rights) patent, design right, trademark rights, brand rights, database rights, know how, trade secrets, confidential information, rights in design, semiconductor topography rights or other intellectual property rights or other property rights, whether vested, contingent or future anywhere in the world.</p> <p>For further information relating to IP, staff should consult their contracts or contact the Dean of Faculty. Students are advised to review policy CCTP5017: IP Created by Students</p> | <p>(Specific responsibility)<br/>Senior Management Team</p> <p>(General responsibility)<br/>All staff</p> | <p>Minutes of any CCT committee meetings, discussing any information on this sub-policy area</p> <p>Minutes of any CCT meetings with employees in relation to this area</p> <p>Any evidence pertaining to procedures in this area</p> <p>Any reports on misconduct by employees in this area</p> |
|---|---|--|

|  |  |  |
|--|--|--|
| <p><b>9. Conflicts of Interest</b></p> <p>9.1 The CCT Conflict of Interest Policy CCTP806 is a supplemental policy to the CCT Code of Conduct.</p> <p>9.2 Employees have a duty to conduct themselves in accordance with the highest standards of business ethics.</p> <p>9.3 Employees will furnish to their line manager details relating to business interests including shareholdings, professional relationships etc, which could involve a conflict of interest or could materially influence employees in the performance of their duties. Any interests of employees’ families of which they could be expected to be reasonably aware or a person or body connected with employees that involve a conflict of interest or could materially influence employees in the performance of their duties should also be disclosed. For this purpose, persons and bodies connected with employees include:</p> <ul style="list-style-type: none"> <li>■ a spouse, partner, parent, sibling or close relative.</li> <li>■ a body corporate with which an employee is associated.</li> <li>■ a person acting as the trustee of any trust, the beneficiaries of which include the employee or the persons at (a) above or the body corporate at (b) above; and</li> <li>■ a person acting as a business partner of the employee or of any person or body who, by virtue of (a) – (c) above, relates to the employee.</li> </ul> <p>9.4 Employees will be considered to have a real conflict of interest when they hold a personal interest, whether direct or indirect, of which they are aware and which in the opinion of a reasonably informed and well-advised person, is sufficient to put into question the independence, impartiality and objectiveness that employees are obliged to exercise in the performance of their duties.</p> <p>9.5 Employees will be aware that they may have a perceived conflict of interest when they appear to have, in the opinion of a reasonably informed and well-advised person, a personal interest, whether direct or indirect, that is sufficient to put into question the independence, impartiality and objectiveness that employees are obliged to exercise in the performance of their duties.</p> <p>9.6 Employees will resolve a conflict of interest in the best interests of the College by declaring their interest to their line manager. In circumstances where employees are unsure as to whether or not a conflict of interest exists, or is material, they should discuss the matter with their line manager who may consult with the Dean of Academic Affairs</p> <p>9.7 Employees serving on College committees or similar bodies must declare any personal interest in the business to be discussed, and if necessary and as required, withdraw from the consideration of such business.</p> | <p>(Specific responsibility)<br/>Management Team</p> <p>(General responsibility)<br/>All staff</p> | <p>Completed Declaration of Potential Conflict of Interest</p> <p>Records of correspondence between CCT and staff member suspected of conflict of interest</p> <p>Minutes of Academic Council and/or ELT / Management Team meetings, discussing any information on this policy</p> <p>Records of correspondence between CCT and external HR consultants, where applicable</p> <p>All written records from the conflict being reported or highlighted, to how the conflict was resolved</p> |
|--|--|--|

|  |  |  |
|--|--|--|
| <p><b>10. Loyalty</b><br/> 10.1 Employees have a responsibility to be loyal to CCT and to be committed to its activities with due regard to the tenets of academic freedom.</p> <p><b>11. Fairness</b><br/> 11.1 This Code of Conduct places an onus on employees to ensure compliance with employment equality and equal status legislation, commitment to fairness in all business dealings, and the valuing and equal treatment of all those with whom the College interacts.</p> <p><b>12. Culture within CCT</b><br/> 12.1 All employees are charged with espousing the culture within CCT to engage with, actively listen to students, and continually strive to provide a supreme student support service. The central objective for all CCT staff is to significantly contribute to providing high quality in all activities, and to strive to facilitate a transcendental student experience, one of the gifts of higher education.</p> <p><b>13. Academic Freedom</b><br/> 13.1 Academic Freedom allows academic staff and learners to engage in academic debate without the fear of reprisals.</p> <p>13.2 Although academic freedom allows lecturers to teach subjects and facts in a manner of free speech, they are not permitted to preach evil or hatred</p> |  |  |
|--|--|--|

| <b>Monitoring</b>                          |  |   |
|--|--|---|
| <b>Monitor (Job Title)</b>                 | <b>Frequency</b>   | <b>Monitoring Method(s)</b>   |
| College President<br>ELT / Management Team | Ongoing reviews throughout the academic year<br><br>Annual review for full academic year | <ul style="list-style-type: none"> <li>- Review of completed <i>Declaration of Potential Conflict of Interest</i> forms from staff</li> <li>- Review of records of correspondence between CCT and staff member suspected of conflict of interest</li> <li>- Review of minutes of Academic Council and/or ELT/ Management Team meetings, discussing any information on this policy</li> <li>- Review of records of correspondence between CCT and external HR consultants, where applicable</li> <li>- Review of all written records from the conflict being reported or highlighted, to how the conflict was resolved</li> <li>- Review of minutes of any CCT committee meetings, discussing any information on this sub-policy area</li> <li>- Review of minutes of any CCT meetings with employees in relation to this area</li> <li>- Review of any evidence pertaining to procedures in this area</li> <li>- Review of any reports on misconduct by employees in this area</li> <li>- Review of employee contracts</li> </ul> |

## POLICY CONTROL SHEET

|                               |   |
|-------------------------------|---|
| <b>Policy Title</b>           | Staff Code of Conduct   |
| <b>Responsible Officer(s)</b> | ELT   |
| <b>Issuance Date</b>          | Juen 2025   |
| <b>Effective Date</b>         | June 2025   |
| <b>Last Review Date</b>       | July 2019   |
| <b>Supersedes</b>             | Version 11  |
| <b>Next Review Date</b>       | August 2027   |
| <b>Designated Reviewer(s)</b> | College President, Dean of Academic Affairs                             |
| <b>Scope</b>                  | Internal staff (full and part time); External (Examiners & Consultants) |

### Revision History

| Revision    | Approval Date | Revision Description                    | Originator               | Approved By                     |
|-------------|---------------|---|--------------------------|---------------------------------|
| New Policy  | August 2015   | New QA system                           | Senior Management Team   | Head of Academics,<br>Registrar |
| Version 1.1 | April 2018    | Updated to reflect changes in roles     | Senior Management Team   | Academic Council                |
| Version 1.2 | June 2025     | Minor updates for presentation purposes | Dean of Academic Affairs | Academic Council                |

### References upon which the Policy section is based

|  |  |
|--|--|
| <b>CCT Policy area</b>                   | Quality Assurance of Teaching Staff & Human Resources  |
| <b>Statutory &amp; System Wide Basis</b> | The Irish Qualifications and Quality Act (Education and Training), 2012; European Standards and Guidelines for QA in the European Higher Education Area, Relevant QQI Standards and Guidelines |
| <b>Related CCT Policies / Forms</b>      | CCT802 – Induction of New Staff<br>CCTP806 – Conflict of Interest Policy   |