

Code of Business Conduct for Board Members and Staff of the Citizens Information Board

Version Control

Version	Approved by	Updates
March 2026	Board of CIB, 27 March 2026	<ul style="list-style-type: none"> • Section (d) of information updated. • Section (a) of work/external environment updated with reference to Protected Disclosures policy and procedures. • Section (b) of work/external environment added with reference to Regulation of Lobbying legislation. • Section (e) of obligations added in line with conflict-of-interest procedures and obligations. • Section (f) of obligations updated. • The approving Committee has been updated from the Strategy and Governance Committee to the Audit and Risk Committee.
July 2022	Board of CIB, 7 July 2022	<ul style="list-style-type: none"> • Version control has been added. • The approving Committee has been updated from the Audit and Risk Committee to the Strategy and Governance Committee. • In line with the Code of Practice for the Governance of State Bodies framework (Appendix C), a section on cooperation with internal audit has been added and another on a culture of speaking up. • References to Annexes have been updated to the current references in the Code of Practice.

The Code of Practice for the Governance of State Bodies requires CIB to put in place a code of conduct in relation to its Board members and staff. This Code describes the nature, intent and scope of application of the Code guiding principles and obligations.

The Code refers to the need for Board Members and staff to comply with the requirements of the Companies Act, if applicable, and any other relevant legislative and regulatory requirements. It identifies the relevant provisions regarding conduct/conflicts of interest in the governing legislation of the body. For CIB sections, 16 and 17 of the Comhairle Act apply. The Code sets out procedures for addressing conflicts of interest.

The Code also makes clear that certain obligations to the CIB regarding, in particular, the non-disclosure of privileged or confidential information do not cease when Board membership or employment in CIB has ended.

The Code recommends that the acceptance of further employment where the potential for conflict of interest arises should be avoided during a reasonable period of time after the exercise of a function in CIB has ceased.

The Code also refers to the need for each member of the Board of CIB and each person holding a Designated Position of employment with CIB to ensure his/her compliance with relevant provisions of the Ethics in Public Office Act 1995 and the Standards in Public Office Act 2001.

The Code of Business Conduct will establish an agreed set of ethical principles and practices and in so doing promote and maintain confidence and trust while at the same time preventing the development or acceptance of unethical practices. This Code of Business Conduct applies to all Board members and staff of the CIB.

Introduction

The Board must approve the Code of Business conduct for Board Members and Staff of CIB, taking account of the implications of the Ethics in Public Office Act 1995 and the Standards in Public Office Act 2001.

Objectives

The Objectives of the Code of Business Conduct include:

- Establishment of an agreed set of ethical principles;

- Promotion and maintenance of confidence and trust; and
- Prevention of development or acceptance of unethical practices.

General Principles

The Code of Business Conduct addresses a number of fundamental issues of principle such as:

Integrity

- a. Board Members are required to disclose outside employment/business interests in conflict or in potential conflict with the business of the CIB as outlined in the provisions of Annex C of the CIB Code of Practice - Disclosure and Ethics in Public Office;
- b. Management and employees are prohibited from involvement in outside employment/business interests in conflict or in potential conflict with the business of the body;
- c. The Board and staff of CIB are required to uphold the prohibition on 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 judgement on business transactions;
- d. CIB Board and Staff are committed to compete vigorously and energetically but also ethically and honestly;
- e. CIB Board Members and Staff are committed to conduct purchasing activities of goods/services in accordance with best business practice as outlined in Annex A and Annex O to the Code of Practice;
- f. CIB Board Members and Staff are committed to ensure a culture of claiming expenses only as appropriate to business needs and in accordance with good practice in the public sector generally and as set out in CIB policies;
- g. CIB Board Members and relevant Staff are committed to ensure that the CIB's accounts/reports accurately reflect their business performance and are not misleading or designed to be misleading;
- h. CIB Board Members and Staff are committed to avoid the use of the CIB's resources or time for personal gain, for the benefit of persons/organisations unconnected with the body or its activities or for the benefit of competitors; and
- i. CIB Board Members and Staff are committed not to acquire information or business secrets by improper means.

Information

The Board and Staff of CIB will:

- a. Support the provision of access to general information relating to the CIB's activities in a way that is open and enhances its accountability to the general public.
- b. Respect the confidentiality of sensitive information held by CIB. This would constitute material such as:
 - i. Commercially sensitive information (including, but not limited to, future plans or details of major organisational or other changes such as restructuring);
 - ii. Personal information; and
 - iii. Information received in confidence by CIB.
- c. Observe appropriate prior consultation procedures with third parties where, exceptionally, it is proposed to release sensitive information in the public interest.
- d. Comply with relevant statutory provisions and CIB policies and procedures related to data protection and freedom of information.

Obligations

The Board and Staff of CIB will:

- a. Fulfil all regulatory and statutory obligations imposed on the CIB;
- b. Comply with detailed tendering and purchasing procedures as outlined in Annex L of the Code of Practice, as well as complying with prescribed levels of authority for sanctioning any relevant expenditure;
- c. Cooperate with internal audit in the internal audit process;
- d. Introduce and comply with, as appropriate, controls to prevent fraud including adequate controls to ensure compliance with prescribed procedures in relation to claiming of expenses for business travel (see annex L to Code of Practice);
- e. Conform with procedures in relation to conflict-of-interest situations, including in regard to acceptance of positions following employment and/or engagement by a State body that may give rise to the potential for conflicts of interest and to confidentiality concerns contained in Annex C of the Code of Practice.
- f. Acknowledge the duty of all to conform to highest standards of business ethics.
 - i. Actual, potential or perceived conflicts of interest must be disclosed at the earliest opportunity and recorded in accordance with CIB procedures.
 - ii. Board members must absent themselves from consideration of any matter where a conflict arises, and such recusals must be recorded in the minutes.

Loyalty

Board members and staff acknowledge the responsibility to be loyal to the CIB and fully committed in all its business activities while mindful that the organisation itself must at all times take into account the interests of the Minister.

Fairness

The Board and Staff of CIB will:

- a. Comply with employment equality and equal status legislation;
- b. Commit to fairness in all business dealings; and
- c. Value customers, treat all customers equally, and have regard to the CIB customer service charter attached at Annex N.
- d. Respect the dignity of their fellow colleagues. The 'Dignity in the Workplace Charter' in Annex G of the Code of Practice encompasses the CIB's organisational values in this regard.

Work/External Environment

The Board and Staff of CIB will:

- a. Promote the development of a culture of openness and accountability whereby workers can raise concerns regarding serious wrongdoing in the workplace without fear of penalisation. The Code of Business Conduct operates in conjunction with the CIB Protected Disclosures Policy, which sets out the formal reporting channels and procedures.
- b. Comply with the requirements of the Regulation of Lobbying legislation, including any obligations arising from designation as a Designated Public Official, and cooperate with CIB's arrangements to ensure transparency in dealings with external stakeholders.
- c. Place highest priority on promoting and preserving the health and safety of employees;
- d. Ensure that community concerns are fully considered; and
- e. Minimise any detrimental impact of the operations on the environment.

Responsibility

- a. It is the Secretary's responsibility on behalf of the Board to circulate this Code of Business Conduct and where applicable a policy document on disclosure of interests to all Board Members and staff for their retention;
- b. All Board Members and staff will acknowledge receipt and understanding of the Code of Business Conduct in writing at the end of their induction programme and where applicable a policy document on disclosure of interests; and

- c. It is the Secretary's responsibility, on behalf of the Board to prepare an explanatory booklet providing practical guidance and direction on such areas as gifts and entertainment and on other ethical considerations which arise routinely.

Review

The Finance, Audit and Risk Committee will ensure that the Code of Business Conduct is reviewed at least every three years, or earlier where required to reflect changes in legislation, Government policy or best practice.

General

This Code of Business Conduct is without prejudice to legislation, circulars, etc. applicable to the conduct of civil and public servants and Board and committee members.