

**CODE OF CONDUCT FOR BOARD AND COMMITTEE MEMBERS OF THE
CHARITY COMMISSION FOR NORTHERN IRELAND
(Reviewed by Board June 2025)**

1. INTRODUCTION

- 1.1 As a public office-holder, your behaviour and actions must be governed by the principles set out in this Code of Conduct. It is your responsibility to ensure that you are familiar with, and comply with, all the relevant provisions of the Code.

2. KEY PRINCIPLES OF PUBLIC LIFE

- 2.1 The key principles upon which this Code of Conduct is based are the Seven Principle of Public Life. These are:

Selflessness

Holders of public office should act solely in terms of the public interest.

Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty

Holders of public office should be truthful.

Leadership

Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.

- 2.2 These principles should inform your actions and decisions as a Board Member.

3. GENERAL CONDUCT

- 3.1 The Board has corporate responsibility for ensuring that the Commission fulfils the aims and objectives set by the sponsor department and approved by the Minister, and for promoting the efficient, economic and effective use of staff and other resources by the body.
- 3.2 To this end, and in pursuit of its wider corporate responsibilities, the Board and its Members shall:

- establish the overall strategic direction of the body within the policy and resources framework determined by the sponsor Minister and department;
- constructively challenge the body's executive team in their planning, target setting and delivery of performance;
- ensure that the sponsor department is kept informed of any changes which are likely to impact on the strategic direction of the body or on the attainability of its targets, and determine the steps needed to deal with such changes;
- ensure that any statutory or administrative requirements for the use of public funds are complied with; that the Board operates within the limits of its statutory authority and any delegated authority agreed with the sponsor department, and in accordance with any other conditions relating to the use of public funds; and that, in reaching decisions, the Board takes into account all relevant guidance issued by the Department of Finance and the sponsor department;
- ensure that the Board receives and reviews regular financial information concerning the management of the body; is informed in a timely manner of any concerns about the activities of the body; and provides positive assurance to the sponsor department that appropriate action has been taken on such concerns;
- demonstrate high standards of corporate governance at all times, including using the independent Audit and Risk Assurance Committee to help the Board to address the key financial and other risks facing the body; and
- appoint, with the Minister's and sponsor department's approval, a Chief Executive to the body and, in consultation with the sponsor department, set performance objectives and remuneration terms linked to these objectives for the Chief Executive, which give due weight to the proper management and use of public monies.

Use of Public Funds

- 3.3 You have a duty to ensure the safeguarding of public funds and the proper custody of assets which have been publicly funded.
- 3.4 You must carry out your fiduciary obligations responsibly – that is, take appropriate measures to ensure that the Commission uses resources efficiently, economically and effectively, avoiding waste and extravagance. It will always be an improper use of public funds for public bodies to employ consultants or other companies to lobby the Assembly, Ministers or political parties.

Allowances

- 3.5 You must comply with the rules set by the Board and the Commission regarding remuneration, allowances and expenses. Payment and taxation of these should be in line with relevant HM Revenue and Customs and DoF guidance. Ultimately, however, it is your responsibility to ensure compliance with all relevant HM Revenue and Customs requirements concerning payments, including expenses.

Gifts and Hospitality

- 3.6 You must not accept any gifts or hospitality which might, or might reasonably appear to, compromise your personal judgement or integrity or place you under an improper obligation.
- 3.7 You must never canvass or seek gifts or hospitality.
- 3.8 You must comply with the rules set by the Commission on the acceptance of gifts and hospitality which are in line with current DoF guidance. You should inform the Chair and Chief Executive of any offer of gifts or hospitality and ensure that, where a gift or hospitality is accepted, this is recorded in a public register in line with the rules set by the Commission.
- 3.9 You are responsible for your decisions on the acceptance of gifts or hospitality and for ensuring that any gifts or hospitality accepted can stand up to public scrutiny and do not bring the Commission into disrepute.

Use of Official Resources

- 3.10 You must not misuse official resources for personal gain or for political purposes. Use of such resources must be in line with the Commission's rules on their usage. This includes facilities, equipment, stationery, telephony and other services.

Use of Official Information

- 3.11 You must not misuse information gained in the course of your public service for personal gain or for political purpose.
- 3.12 You must not disclose any information which is confidential in nature or which is provided in confidence without authority. This duty continues to apply after you have left the Board.

Political Activity

- 3.13 In your public role, you should be, and be seen to be, politically impartial. You should not occupy a paid party political post or hold a particularly sensitive or high-profile role in a political party.
- 3.14 On matters directly related to the work of the Commission, you should not make political statements or engage in any other political activity.
- 3.15 In your official capacity, you should be even-handed in all dealings with political parties.
- 3.16 Subject to the above, you may engage in political activity but should, at all times, remain conscious of your responsibilities as a Board Member and exercise proper discretion. You should inform the Chair and the sponsor department before undertaking any significant political activity.

Employment and Appointments

- 3.17 If you wish to take up new employment or appointments during your term of office, you must inform the Chair and the sponsor department. Formal consideration will be given to whether such additional appointments are appropriate given your current appointment to this body.
- 3.18 On leaving office, you must comply with the rules of the Commission on the acceptance of future employment or appointments.

4. MEMBERS' INTERESTS

- 4.1 You must ensure that no conflict arises, or could reasonably be perceived to arise, between your public duties and your private interests – financial or otherwise. You should note that the appearance of a conflict of interest, in terms of public perception, can be every bit as damaging as an actual conflict - both should be avoided.
- 4.2 You must comply with the rules of the Commission on handling conflicts of interests. As a minimum, these will require you to declare publicly any private interests which may, or may be perceived to, conflict with your public duties.
Interests which may need to be declared can include:
- Remuneration from employment, self-employment, directorships, other public appointments etc;
 - Related undertakings ie you must register any directorships held which are themselves not remunerated but where the company (or other undertaking) in question is a subsidiary or parent of a company (or other undertaking) in which you hold a remunerated directorship;
 - Contracts with the Commission;
 - Houses, land and buildings that you own or have an interest in, which are of significance or relevance to, or bear upon the work and operation of the Commission;
 - Shares and securities – holdings in a company or organisation which are of significance to or relevance to, or bear upon the work and operation of the Commission.
 - Relevant non-financial interests including membership or holding office in other public bodies, charities, clubs, societies and organisations such as Trade Unions and voluntary organisations.
 - Cases in which a close family members or persons living in the same household as you may have an interest.
- 4.3 If you are in any doubt as to what you should or should not be registering / declaring you should discuss this with the Chair and/or the Chief Executive.
- 4.4 Charity Commissioners and Committee members may be trustees/management committee members, but not office bearers, of charities in Northern Ireland. If, on appointment as Charity Commissioner or Committee member, an individual is already involved as an office bearer of a charity, they must declare this interest and a reasonable period may be agreed with the Chief Commissioner and Chief Executive for withdrawing from the office-bearer position and allowing the charity to make alternative arrangements. The Chair and Chief Executive may not be trustees/management committee members of any charity.
- 4.5 The rules will also require you to remove yourself from the discussion or determination of matters in which you have a financial interest. In matters in which you have a non-financial interest, you should not participate in the discussion or determination of a matter where the interest might suggest a danger of bias.
- 4.6 In certain situations, handling a conflict of interest properly may require much more than simply leaving a Board meeting while the matter is being discussed or voted upon. For example, Board Members who have a conflict of interest should:

- not get involved in the setting of criteria for the assessment of the grant, tender etc;
 - not get involved in the actual preparation of the grant, tender, licence application (or subsequent presentations, interviews etc) if at all possible;
 - not receive any relevant papers in advance of the meeting;
 - not be present for the discussion or voting or receive any minutes relating to that part of the meeting; and
 - not use their position as a Board Member to try and improperly influence a decision by lobbying any other Board Member(s) or by contacting another Board Member to represent their interests at the meeting.
- 4.7 It is extremely important that there should be a level playing field with no advantage (real or perceived) given to Board Members or to individuals or organisations with Board connections or representation.
- 4.8 It is your responsibility to ensure that you are familiar with the Commission's rules on handling conflicts of interests, that you comply with these rules and that your entry in the Commission's register of Members' interests is accurate and up-to-date.

No Code can provide for all circumstances and if you are uncertain about how any aspect of the Code of Conduct applies, you should seek advice from the Chair and/or the Chief Executive who, in turn, may seek advice from the sponsor department.

5 RESPONSIBILITIES AS A BOARD MEMBER

- 5.1 You should play a full and active role in the work of the Commission. You should fulfil your duties and responsibilities responsibly and, at all times, act in good faith and in the best interests of the Commission.
- 5.2 You should deal with the public and their affairs fairly, efficiently, promptly, effectively and sensitively, to the best of your ability. You must not act in a way that unjustifiably favours or discriminates against particular individuals or interests.
- 5.3 You must comply with any statutory or administrative requirements relating to your post.
- 5.4 You should respect the principle of collective decision-making and corporate responsibility. This means that, once the Board has made a decision, you should support that decision.
- 5.5 You must not use, or attempt to use, the opportunity of public service to promote your personal interests or those of any connected person, firm, business or other organisation.

6. RESPONSIBILITIES TOWARDS EMPLOYEES

- 6.1 You will treat any staff employed by the Commission with courtesy and respect. It is expected that employees will show you the same consideration in return.
- 6.2 You will not ask or encourage employees to act in any way which would conflict with their own Code of Conduct.

7. SOCIAL MEDIA

- 7.1 Social media is a public forum and the same considerations, including the provisions of this Code, apply as would to speaking in public or writing

something for publication, either officially or in a personal capacity. When engaging with social media you should at all times adhere to the Commission's social media policy.

8. RAISING CONCERNS

- 8.1 You should ensure that the Commission has an open, transparent and safe working environment where employees feel able to speak up and raise concerns, and complaints procedures are clearly communicated to them.
- 8.2 If you have a concern about a possible breach of this Code, a concern that you or any staff of the body are being asked to act in contravention of their own code of conduct, or a concern about misconduct or wrongdoing in any other areas, then you have a responsibility to raise that internally with the Chair of the Commission or the Permanent Secretary of the sponsor department as appropriate.