

An tÚdarás Rialála Comhlachtaí Tithíochta Ceadaithe

Approved Housing Bodies
Regulatory Authority



Approved Housing Bodies Regulatory Authority

AHBRA Code of Conduct
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Document control – Change and Review History

Issue Date	Issue	Author	Approver	Reason for Change
September 2025	COC003	Head of Legal	Board	Updated to align with COPGSB. Language streamlined, formatting and structural simplification with sections relocated for thematic consistency. Existing policies referenced rather than included. Amended following staff feedback.
March 2023	COC002	Board Secretary	Board	Updated to reflect continued development of policies – changes to confidentiality, media, data compliance and protected disclosure provisions.
March 2021	COC001	Board Secretary	Board	Adoption of initial Code of Conduct.

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AHBRA Code of Conduct

1. Introduction

The Approved Housing Bodies Regulatory Authority (AHBRA) is established under the Housing (Regulation of Approved Housing Bodies) Act 2019 (the Act). Its mission is to protect homes provided by Approved Housing Bodies through the delivery of effective regulation.

In delivering independent, proportionate and fair regulatory oversight, AHBRA requires its activities to be conducted with integrity and with adherence to its values.

This Code of Conduct outlines the ethical standards, principles, and expected behaviours for Board members, Committee members and staff of AHBRA. It reflects the values of integrity, transparency, accountability, and public service, and has been prepared with reference to the provisions of the Act, and the Code of Practice for the Governance of State Bodies.

A copy of this Code of Conduct is given to Board and Committee members and staff of AHBRA. It is also published on AHBRA's website.

2. Scope

This Code of Conduct applies to all AHBRA Board members, staff and members of committees established by the Board, who are expected to familiarise themselves with the Code and apply it in their activities.

Board and Committee members and staff share a commitment to integrity, confidentiality and accountability however sections in this Code that refer specifically to 'Board members' reflect responsibilities unique to governance or oversight roles. For the purposes of this Code, references to 'Board members' include members of Board Committees, whether or not they are also members of the Board, except where otherwise specified.

AHBRA has adopted specific policies on Conflict of Interests, Protected Disclosures and Gifts and Hospitality. These should be read in conjunction with this Code.

3. Ethical Principles and Integrity

a. Conflicts of interest

All individuals must avoid situations where personal interests could interfere with their official duties. Any actual, potential, or perceived conflict must be disclosed promptly in accordance with AHBRA's Conflict of Interest Policy.

The AHBRA policy on conflicts of interests is derived in part from the Act , which imposes particular obligations in relation to material interests. Even though AHBRA is not yet a prescribed body under the Ethics in Public Office Acts 1995 and 2001, it is AHBRA's policy that Board and Committee members, as well as certain staff members, should submit annual Statements of Interest.

AHBRA staff, Board and Committee members should not give or receive gifts, hospitality or other benefits which might be seen to compromise their personal judgment or integrity.

Further information and direction on these matters is provided in AHBRA's Conflict of Interests Policy and Gift and Hospitality Policy.

Post-Employment and Post-Membership Confidentiality and Conflict Management

All Board, Committee members and staff are required to maintain the confidentiality of all sensitive information acquired during their tenure, including after their membership of the Board has ceased or their employment with AHBRA has ended. This obligation is fundamental to preserving trust and safeguarding AHBRA's interests.

Furthermore, AHBRA recommends that individuals avoid accepting employment or engagements that may create a real or perceived conflict of interest during a reasonable period following the conclusion of their service. This measure helps to prevent any undue influence or exploitation of privileged information gained during their time with AHBRA.

b. Competitive and Honest Business Practices

Board and Committee members as well as staff members have a duty to conform to the highest standards of business ethics.

All procurement activities for goods and services must be conducted in accordance with best business practices and AHBRA's guidelines, to ensure fairness and transparency. Expense claims should reflect only genuine business needs and align with public sector practices to maintain fiscal accountability.

Staff and Board members shall acquire information only through proper legal channels to protect the organisation's integrity and sustain public trust.

c. Regard for Resources

AHBRA resources, including time, assets, and information, must be used solely for official purposes. Staff, Committee and Board members are expected to demonstrate responsible stewardship, avoiding waste or misuse.

Staff and Board members shall ensure that all AHBRA property assigned to them is maintained in good condition and shall be accountable for such property.

4. Transparency and Accountability

a. Disclosure of Information

AHBRA Board and Committee members, along with its management and staff, support the transparent provision of general information about AHBRA's activities and aim to be transparent in decision-making, while respecting the confidentiality of sensitive information held by AHBRA.

Staff will comply with the requirements of the Freedom of Information Act and facilitate, where possible, other requests for information. Where exceptionally it is decided to release sensitive information in the public interest, AHBRA has procedures in place to

ensure that appropriate consultation with relevant third parties takes place prior to release.

Staff who deal with personal data will comply with applicable Irish and EU data protection legislation.

Those involved in the preparation and review of AHBRA's Annual reports and financial statements ensure same accurately reflect AHBRA's true performance without any misleading information.

Staff and Board members should adhere to, and maintain familiarity with, AHBRA's relevant data policies, including AHBRA's Freedom of Information Policy, Data Protection Policy, and any relevant ICT security policies, as appropriate.

b. Confidentiality and Legal Compliance

Much of the information provided to AHBRA is of a confidential nature, which is not yet public, or may not be intended to be public. Staff, Board and Committee members are required to maintain strict confidentiality in relation to this information.

In accordance with Section 65 of the Act, staff, Board and Committee members shall not disclose confidential information obtained by them while performing functions under the Act unless they are required by law, or duly authorised by the Regulator, to so do.

Staff and Board members shall maintain, at all times, the confidentiality of all confidential information and records of AHBRA and must not make use of or reveal such information or records, except in the course of performance of their duties or unless the documents or information become a matter of general public knowledge.

Staff and Board members shall not use confidential information obtained through their association with AHBRA to further private interests of themselves, friends or relatives.

Staff and Board members must ensure that this confidentiality is maintained where membership of the Board has ceased or where employment has ended with AHBRA.

Staff and Board members will adhere to AHBRA's data protection and records management policies, including ensuring the secure disposal of AHBRA documentation.

5. Workplace Behaviour and Culture

a. Commitment

Board members, Committee members, and staff are expected to act in the best interests of AHBRA, be fully committed to the organisation's activities, and uphold the highest standards of ethical and professional conduct.

Members of the Board and its Committees will use their reasonable endeavours to attend all respective meetings.

b. Fairness

Staff, Board and Committee members will act fairly and reasonably by:

- Complying with employment equality and equal status legislation
- Avoiding any unjustified discrimination between individuals
- Ensuring equality of treatment (e.g. persons in the same circumstances are treated in a similar manner)
- Ensuring that their actions do not arbitrarily affect any stakeholder adversely or given preferential treatment to any stakeholder
- Ensuring that any difference in treatment is justified objectively.

c. Respect and Accountability

Respect is fundamental to AHBRA's working environment. Board members and staff engage constructively, value diverse perspectives, and maintain professional conduct.

Board, Committee and staff members are encouraged to raise concerns regarding serious wrongdoing in the workplace without fear of reprisal. Additionally, Board and staff members should ensure that colleagues' concerns are fully considered.

Consistent with AHBRA's policies, it is expected that any appropriate issue raised by staff relating to a matter of the business of AHBRA will be dealt with professionally and appropriately. This is essential to ensuring that all significant risks arising for AHBRA are identified and effectively managed. In addition, any worker¹ appropriately raising any issue of concern will not be penalised for doing so.

Staff and Board members should adhere to, and maintain familiarity with, AHBRA's Protected Disclosures Policy.

6. Governance and Compliance

The Board is responsible for setting the strategic direction of AHBRA, providing oversight, and ensuring that the organisation complies with its statutory and public service obligations. In fulfilling this role, Board members must exercise sound judgement in distinguishing between governance responsibilities and operational matters. The Board sets policy and strategic objectives, while implementation and day-to-day management rest with the Executive.

Board members are expected to act collectively in the best interests of AHBRA, contributing constructively to discussions and drawing on their individual expertise to support informed, shared decision-making.

Board members should take care to ensure that any requests for information or action are channelled appropriately and do not place undue demands on staff outside of agreed governance processes. Interactions between the Board and staff should reflect professional respect, clear boundaries, and an understanding of the Chief Executive's authority in managing the organisation's capacity and workload.

All members of the Board are responsible for upholding the integrity and reputation of AHBRA. Where an individual's continued participation in the Board could reasonably be

¹ Worker' is used here as defined in the Protected Disclosures Act 2014 (as amended), which includes employees, former employees, agency workers, contractors, volunteers, and job applicants.

seen to cause reputational harm or undermine stakeholder confidence, they are expected to take appropriate steps to address the matter.

Finally, Board members must ensure that they understand and comply with all legal, regulatory, and governance obligations relevant to their role. Where there is any doubt, they should seek clarification through appropriate channels to ensure that AHBRA's governance is conducted to the highest standard.

7. Application of Organisational Policies

This Code of Conduct operates alongside AHBRA's internal policies, procedures, and regulatory obligations. Board members and staff must fulfil all statutory obligations relevant to their roles. In the event of any conflict between this Code and any statutory or contractual obligations, the latter will prevail.

Where more detailed operational matters are addressed in HR, procurement, IT, or financial policies, staff, Committee and Board members are expected to familiarise themselves with and apply those policies as appropriate to their roles.

8. Workplace Conduct

Staff and Board members are expected to contribute to a professional, respectful, and safe working environment through their behaviour and interactions with one another.

They must uphold the health, safety, and welfare of colleagues and others with whom they interact in the course of their work. Conduct that risks harm to physical or psychological wellbeing is not acceptable.

Individuals are also expected to consider the environmental impact of their work, and to support AHBRA's commitment to operating in a sustainable and responsible manner, in line with relevant policies and guidance.

9. Breach of the Code

Breaches of this Code will be addressed under the relevant governance or HR framework. For staff, this means the organisation's Disciplinary Policy. For Board members, the statutory provisions of the 2019 Act apply. For committee members appointed by the Board, expectations and consequences are set out in their letters of appointment.

10. Approval and Review

The Code of Conduct will be reviewed in 2 years from effective date or sooner if required and/or when revised Government guidance is issued.

This Code of Conduct was approved by the Board of the Approved Housing Body Regulatory Authority on **8 September 2025**.