

TRANSPARENCY INTERNATIONAL IRELAND

CODE OF ETHICAL ADVOCACY

In order to achieve our vision of an Ireland where entrusted power is used in the public interest, Transparency International Ireland (TI Ireland) is actively advocating and routinely engaging with a wide range of individuals, as well as public and private institutions. TI Ireland is a non-profit organisation, committed to the fight against corruption and to being transparent about our advocacy activities, as well as our policies, expenditure and the names of the individuals working for us.

TI Ireland is committed to ethical behaviour in all aspects of our work and this is reflected in our comprehensive governance and ethics framework. We proactively disclose information about the organisation and our activities and all our policies are rooted in our Vision, Values and Guiding Principles, our Code of Conduct, and Irish legislation. TI Ireland also adopts a responsible, evidence and risk-based approach to public criticism.

This code of ethical advocacy has been adapted from Transparency International's international Code of Ethical Advocacy and aims to complement our existing ethics architecture by spelling out clearly the minimum standards we expect of our organisation in our commitment to being open and ethical in our advocacy activities.

Definitions

The term 'advocacy' generally encompasses a broad range of activities which seek to influence decision-making. These activities can include both mobilising public involvement to influence a decision-maker and directly engaging with a decision-maker. It is widely recognised that direct engagement by companies, associations, organisations and individuals with decision-makers can become distortive if it happens in secret, if it is conducted unethically or if disproportionate levels of influence exist. When safeguards for transparency and accountability are limited or non-existent, there is a risk of illegal, undue and unfair influence taking place.

For the purposes of this Code, we are mostly concerned with advocacy through direct engagement with decision-makers. Hereafter, advocacy refers to any communication which is made, managed or directed towards a decision-maker or person with influence (public or private sector) with the purpose of seeking to influence that person and their decisions. This includes the preparation, initiation and follow-up to the communications made. Targets of our advocacy may include public decision-makers and representatives at national, supranational and subnational levels, and representatives from the private sector and from other international organisations and associations.

Scope of Application

This Code explicitly outlines the commitment to ethical advocacy of TI Ireland and its senior leadership. It applies to TI Ireland staff, members of its Board, contractors, and volunteers mandated by TI Ireland to speak on behalf of the organisation, hereafter referred to as 'we'.

Guiding Principles of Ethical Advocacy

We support and promote responsible, accountable, transparent and democratic political processes that benefit society at large. This requires explicit ethical policies of the highest standards, respecting the roles and responsibilities of the institutions and organisations we seek to engage, being open about our interactions with decision-makers and the interests we seek to advance, and being attuned to our mission and values throughout.

To that end, we commit to ensuring that our advocacy is consistent with our mission, grounded in our work, based on evidence and advancing defined public interests. We are committed to ensuring that our advocacy and policy positions are aligned with our values and that we respect, protect and fulfil the basic principles as outlined in the UN Convention against Corruption, OECD Anti-Bribery Convention, and the UN Declaration of Human Rights and its supplementary Conventions.

Propriety of Influence

We will identify ourselves by name and organisation to those we seek to influence at the earliest appropriate opportunity.

We will neither intentionally misrepresent, nor look to create any false impressions, as to the true nature and status of our inquiries.

We will attempt to always disseminate information that is reliable, verifiable and up-to-date.

We commit that the positions we take will be based on sound, objective and professional analysis, and high standards of research.

We commit to not intentionally misrepresent public sentiment ('astro-turfing').

We will not engage in any other undue influence on decision-makers, including inducements, manipulation, intimidation or coercion.

Gifts and Hospitality

Under no conditions will we provide any undue advantages to decision-makers, their associates or their family members.

We will not offer gifts to decision-makers and any hospitality offered must be reasonable, bona fide, and socially acceptable, not allowing for any impression of improper influence over the political process or the execution of their professional duties.

We will not accept any gift or hospitality, entertainment, loan or anything else of value from any organisation or individual if it could be reasonably construed or perceived that the gift is motivated by a wish to influence TI Ireland. Gifts valued between €20 and €100 will be registered with the Office Coordinator at TI Ireland and any gift valued above €100 will be refused.

We will only invite decision-makers to events, subject to the informative purpose being clearly evident. Only reasonable food and accommodation may be offered, and no hosting or travel of accompanying guests will be covered by our organisation.

We will not provide any contributions to political parties, whether financial or in-kind.

Pre-Employment Due Diligence and Respect for Post-Employment Rules

We will respect any rules incumbent on prospective employees, particularly concerning time limitations and necessary waivers for the performance of paid and unpaid services, as well as the confidentiality of certain privileged information.

We will not enlist (as paid staff, consultants or pro-bono representatives) any public or elected officials for the duration of their tenure or during 'cooling-off' periods required by their past offices. When recruiting such former officials (as paid staff or volunteers) after they leave public office, we will carry out due diligence to ensure that no conflict of interest arises in their transition to TI Ireland and may suggest a proportionate 'cooling-off' period, where appropriate.

Where a current member of staff or Board member experiences potential conflict of interest with regard to their previously held position, such conflict will be disclosed and resolved in line with TI Ireland's Conflict of Interest Policy and Code of Conduct (and in the case of the international Board, their respective Code of Conduct) with particular sensitivity for the potential public interest at play.

We will not allow actions and decisions in the course of our work to be improperly influenced by the prospect of future employment with others.

In the case of individuals leaving TI Ireland for future employment in an institution which the individual has previously sought to influence on behalf of TI Ireland, we will avoid any real or perceived conflicts of interest and self-impose a 'cooling-off' period before taking up that position, where appropriate.

Registration, Publication and Reporting

We will register and report our advocacy efforts through the Irish lobbying register and will provide each requested piece of information to the best of our knowledge. In addition, we will post any submissions made aimed at influencing public policy on our website.

We will proactively disclose the following information:

- A list of meetings in which we have sought to influence public decision-making processes, including the name of TI Ireland representatives present;
- The name of the institution or organisation (advocacy target);
- The name and position of the representative of the institution or organisation (respecting relevant data protection regulations);
- The date of the meeting;
- The subject matter discussed and any policy positions used in support of the advocacy effort; and
- The names of our advocacy staff and whether they have held public or elected office in the last five years.

Meetings will be reported as close to real-time as possible and in accordance with our obligations under the Lobbying Regulation Act 2015.

Our annual reports will provide a detailed breakdown of any public funding received and a list of any networks or associations that TI Ireland is a formal member of or with which it is substantially engaged.

Measures to Ensure Compliance with the Code of Ethical Advocacy

This Code will be disseminated to all individuals to whom it applies (see Scope of Application above) and, where required, it will be supported with dedicated training. All individuals to whom this Code applies must confirm that they acknowledge it with their signature. In the case of employees, the signed document will be appended to their TI Ireland employment contract as part of the TI Ireland Staff Handbook.

The Office Coordinator at TI Ireland will oversee implementation of the Code, monitor compliance, and ensure periodic reporting to organisational leadership.

Any violation against this Code can lead to disciplinary action.

External Dissemination

In case we implement advocacy activities via external service providers, we undertake to ensure that those service providers are made aware of the ethical standards that have been set in this Code and that adherence to the Code is included in the terms of their contract.

We will disseminate this Code and encourage its adoption by the advocacy coalitions and networks to which we belong.