



**Oifig an Stiúirthóra Náisiúnta, Acmhainní Daonna**  
Feidhmeannacht na Seirbhíse Sláinte  
Ospidéal Dr. Steevens'  
Baile Átha Cliath 8

**Office of the National Director of Human Resources**  
Health Service Executive  
Dr. Steevens' Hospital  
Dublin 8  
Tel: 01 6352319 Email: nationalhr@hse.ie

Neasa Hourigan T.D.

21<sup>st</sup> April, 2022

**PQ 18091/22:** To ask the Minister for Health the names of any HSE managers that declared a conflict of interest in respect of procurement or rent of property by the HSE in each of the years 2016 to 2021; the details of the procedure within the HSE for declaring such a conflict of interests and responding to same; and if he will make a statement on the matter. -Neasa Hourigan

Dear Deputy,

I refer to your recent parliamentary question above which was sent to the HSE for reply.

The HSE cannot comment on private information relating to individual employees.

In respect of policy around potential conflicts of interest for HSE employees, the Code of Standards and Behaviour for the HSE was introduced in accordance with section 25(3) of the Health Act 2004 and the Ethics in Public Office Acts 1995 to 2001 and applies to all employees of the HSE, organisations funded by the HSE and suppliers of service. It sets out a clear framework within which employees must work, as well as the principles which should govern the behaviour of employees in the discharge of their duties.

One of the main features of the Code provides that in the performance of their duties employees must maintain the highest standards of probity by:

- conducting themselves with honesty, impartiality and integrity;
- never seeking to use improper influence, in particular, never seeking to use political influence to affect decisions concerning their official positions;
- abiding by guidelines in respect of offers of gifts or hospitality; and
- avoiding conflicts of interest.

The Code provides that the use of their official positions by employees to benefit themselves or others with whom they have personal or business ties is not allowed. Employees are prohibited from seeking to influence decisions on matters pertaining to their official positions other than through established procedures.

The Code also provides that employees must not seek contracts with government departments or offices for supply of goods or services whether for their own benefit or for the benefit of any company with which they may have an involvement in a private capacity, unless specifically sanctioned by the CEO of the HSE.

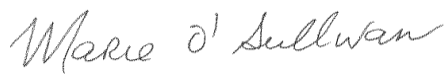
Any employee in any grade where the minimum point of the salary scale applicable to that grade is equal to or greater than the first point of the Grade VIII salary scale (i.e. €70,373 as at 1 October 2021) occupies a "Designated Position of Employment" under the Ethics Acts and these employees are required to file a Statement of Interests or alternatively a NIL Statement on an annual basis. It is a contractual as well as a statutory obligation to disclose any interest which could materially influence a designation employee in the performance of their role in the HSE.

A designated employee is also required to review all registrable interests held by the person, spouse, civil partner, child or child of a spouse and to disclose them if they could, at any stage in the future, materially influence him/her in the performance of his/her functions in his/her current position where such performance could so affect those interests as to confer on, or withhold from, the person, or the spouse or civil partner or child, a substantial benefit.

These Statements of Interests are made confidentially to the CEO of the HSE. Following engagement and advice from the Standards in Public Office Commission, the HSE agreed a Review Process for assessing the Annual Statements of Interest declarations which enables the HSE to manage the Statements of Interests submitted and ensure that any conflicts of interest/potential conflicts of interest are identified and managed.

Additionally, where a function of an employee's position falls to be performed and they have actual knowledge that they, or a connected person, has a material interest in a matter to which the function relates, they must furnish a statement in writing of those facts to the Chief Executive Officer / Chief Officer of the Hospital Group / Community Healthcare Organisation / National Director where they work. The employee is not permitted to perform the function unless there are compelling reasons to do so. A statement in writing of the compelling reasons must also be furnished.

Yours sincerely,

A handwritten signature in cursive script that reads "Marie O'Sullivan".

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**Marie O'Sullivan**  
**National HR**