



## **CONFLICT OF INTEREST AND FRAUDULENT BEHAVIOUR POLICY**

### **Purpose of Policy**

When carrying out your duties you are acting as a representative of the Club. We trust you to act in an honest, fair and ethical manner at all times and to uphold our ethos and best interests at all times.

It is of the utmost importance that you maintain integrity and avoid conflicts of interest which could damage our reputation. We trust you to use your own judgement, common sense and integrity as to what is appropriate in given circumstances. Equally fraud of any kind will not be tolerated and will result in Disciplinary action being taken and complaints made to Gardai when necessary.

### **Scope of Policy**

This policy applies to all members of the Club, its Officers, Volunteers, Employees, Suppliers and Contractors.

### **Policies**

#### **Conflict of Interest**

When determining what qualifies as a conflict of interest the emphasis is on whether there is potential for a conflict of interest or whether it is perceived there could be a conflict of interest. An additional policy is also applicable to the Club Committee members.

While this list is not exhaustive you should not knowingly engage in any activity either in work or outside of work which:

- is contrary to the interest of the Club.
- is in competition to the Club.
- could bring the name of the Club into disrepute.
- could compromise the confidentiality of Club activities.
- could compromise the objective nature of the Club.

You should also consider that a conflict of interest may arise where a close family member or friend is engaged in any activity outlined above.

If you are aware of a potential conflict of interest you should discuss this with the person to whom you report , discuss the conflict and declare same in writing.

If a conflict of interest is found to exist, a decision will be made as to whether or not you can continue on in that aspect of work you may be involved in. In some instances you may be requested to absent yourself from certain duties. Should this situation arise the process will be carried out in consultation with you.

Failure to comply with this policy may invoke the disciplinary procedure, up to and including dismissal.

### **Fraudulent Behaviour**

Certain persons are permitted to use Club premises, telephones, computer systems, communications networks and other facilities. We reserve the right from time to time to monitor these facilities to prevent misuse and for its general business purposes in accordance with the General Data Protection Regulations. Risks of fraud must be controlled and suspicions of dishonesty reported and efficiently investigated. Investigations are also critical to clear the names of individuals and companies wrongly suspected. Personal information provided may be used in relation to fraud prevention and other crime related investigations.

### **Types of Fraud**

"Fraud" covers any deception or dishonesty by which one or more persons or Club intends to gain any improper advantage over others, and the words "fraud", "dishonesty" and "deception" are considered synonymous.

Examples of Fraud to which the policy applies:

- Misappropriation of assets including the unauthorised removal of intellectual capital and information.
- Corruption meaning the payment or receipt of any unauthorised benefit for doing, or not doing anything in relation to duties.
- Conflicts of interest meaning those cases where persons have private, undisclosed interests, which could interfere with their obligations.
- False reporting. This includes both the creation of false reports and suppression of material information.
- Technological abuse including unauthorised access to computer systems, implanting viruses or any other malicious code (s) and sabotage.

Any breach of this Policy may result in disciplinary action being taken.

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