



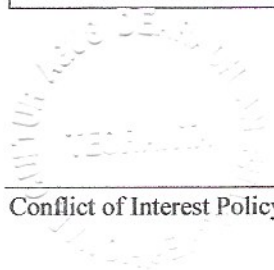
Ionad Cultúr agus Dearadh An Fháirche CFTR

Conflict of Interest Policy

Final 1 Jan 2022

This policy was ratified by the Board of Directors signed below.

Name	Signature	Role	Date
Barry Lambe	<i>[Handwritten Signature]</i>	Director	1/5/22
Patricia Walsh	<i>[Handwritten Signature]</i>	Director Secretary	
Mary Lee	<i>[Handwritten Signature]</i>	Director Treasurer	1 June 2022
Superseded on	DD/MM/YY		



Conflict of Interest Policy:

Ionad Cultúr agus Dearadh An Fháirche

Cuideachta Faoi Theorainn Ráthaíochta

1. Purpose

The purpose of this policy is to assist charity trustees of Ionad Cultúr agus Dearadh An Fháirche CFTR to effectively identify, record and manage any conflicts of interest in order to protect the integrity of Ionad Cultúr agus Dearadh An Fháirche CFTR and to ensure that the charity trustees act in the best interest of their charity.

2. Objective

The Ionad Cultúr agus Dearadh An Fháirche CFTR Board of Directors (called the ‘board of charity trustees’ in this policy) aims to ensure that the charity trustees are aware of their obligations to disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of Ionad Cultúr agus Dearadh An Fháirche CFTR.

3. Scope

This policy applies to the trustees of Ionad Cultúr agus Dearadh An Fháirche CFTR, as well as volunteer committee members to whom the trustees have delegated decision making authority. .

4. Definition of Conflicts of Interests

A conflict of interest is any situation in which a charity trustee’s personal interests or loyalties could, or could be seen to, prevent the charity trustee from making a decision in the best interests of the charity. This personal interest may be direct or indirect, and can include interests of a person connected to the charity trustee.

These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the charity and therefore must be managed accordingly.

5. Policy

This policy has been developed because conflicts of interest commonly arise, and do not need to present a problem to the charity if they are openly and effectively managed. It is the policy of the Ionad Cultúr agus Dearadh An Fháirche CFTR as well as a responsibility of its charity trustees, that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with their obligations to Ionad Cultúr agus Dearadh An Fháirche CFTR.

Ionad Cultúr agus Dearadh An Fháirche CFTR will manage conflicts of interest by requiring charity trustees to:

- avoid conflicts of interest where possible
- identify and record any conflicts of interest
- carefully manage any conflicts of interest, and
- follow this policy and respond to any breaches

5.1 Responsibility of the board of charity trustees

The board is responsible for:

- establishing a system for identifying, disclosing and managing conflicts of interest across the charity;
- monitoring compliance with this policy; and
- reviewing this policy on an annual basis to ensure that the policy is operating effectively

The charity trustees should ensure they are aware of their legal obligations in the management and control of their charity and should refer to the Charities Regulator's 'Guidance for Charity Trustees' for further information on this see the Charities Regulator website³.

5.2 Identification and disclosure of conflicts of interest

Once an actual, potential, or perceived conflict of interest is identified, it must be entered into Ionad Cultúr agus Dearadh An Fháirche CFTR's register of interests, as well as being raised with the board of charity trustees. The register of interests must be maintained by the company secretary and record all information related to a conflict of interest including the nature and extent of the conflict of interest and any steps taken to address it – (see Appendix A).

Confidentiality of Disclosures

In order to support charity trustees to disclose their conflicts of interest, the level of confidentiality associated with any disclosure will be held as confidential to the Board of Directors, and Secretary only. Any further disclosure of conflicts of interest (such as requested by a granting body or funding agency) is at the discretion of the Board Members. Prior to any act of disclosure in verbal or written or any other form, the scope, format and extent of the event of the disclosure must be clearly described, and a quorum of Board of Directors must vote to disclose or not disclose. A vote to disclose must be unanimous, any vote not to disclose prohibits disclosure.

6. Action Required for Management of Conflicts of Interest

6.1 Conflicts of interest of members of the board of charity trustees

Once the conflict of interest has been appropriately disclosed, the board of charity trustees (excluding the disclosing charity trustee and any other conflicted person) must decide whether or not a conflicted charity trustee should:

- vote on the matter (**this is a minimum**),
- participate in any debate, or
- be present in the room during the debate and the voting

In exceptional circumstances, such as where a conflict is very significant or likely to prevent a charity trustee from regularly participating in discussions, it may be worth the board of charity trustees considering whether it is appropriate for the person with the relevant conflict to resign from the board of charity trustees.

6.2 What should be considered when deciding what action to take

- In deciding what approach to take, the board of charity trustees will consider whether the conflict
- needs to be avoided or simply documented
- whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making
- alternative options to avoid the conflict

- the charity's objects and resources, and
- the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, the charity

The approval of any action requires the agreement of at least a majority of the board of charity trustees (excluding any conflicted charity trustee) who are present and voting (if applicable) at the meeting. All details regarding the conflict of interest, including the action arising, will be recorded in the minutes of the meeting.

7. Compliance with This Policy

If the board of charity trustees has a reason to believe that a person subject to this policy has failed to comply with it, it will investigate the circumstances.

If it is found that this person has failed to disclose a conflict of interest, the board of charity trustees may take action against the person. The Board of Trustees may impose relevant and proportionate sanctions at their sole discretion up to and including seeking the person's resignation from the charity.

If a charity trustee suspects that a fellow charity trustee has failed to disclose a conflict of interest, they must first discuss the omission with the trustee, but if the omission persists, they must notify the remaining charity trustees. If a member of the public suspects that a charity trustee has failed to disclose a conflict of interest, the member of public must bring it to the attention of the Board of Directors /Charity Trustees.

Contacts

For questions about this policy, contact the board of charity trustees or Secretary by

email: allsaintsclonbur@gmail.com (preferred)

mail: **All Saints Heritage Centre**
 Ionad Cultúr agus Dearadh An Fháirche CFTR
 Ballynonagh
 Clonbur
 Co. Galway
 Ireland F12Wn72

in person: **All Saints Heritage Centre**
 Ionad Cultúr agus Dearadh An Fháirche CFTR
 An Fháirche Clonbur
 Co Galway, Ireland F12 H9R2

phone: +353 083.405.5517

Appendix A: Template of Register of Interests

Ionad Cultúr agus Dearadh An Fháirche CFTR

Please note that master Register of Interests is maintained as a separate document, the “ Register of Interests - Ionad Cultúr agus Dearadh An Fháirche CFTR” .

Name of Charity Trustee	Date of Appointment	Description of Interest	Has the board of charity trustees been notified of the interest?	Date of disclosure