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CYCLING
ULSTER

Anti Fraud Policy and Procedures

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Cycling Ulster is the Provincial Executive and sub-committee of The Irish Cycling Federation
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Responsibility:	Chairman Treasurer Executive	Status:	Version: 1.2 Revised – August 2008

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ANTI-FRAUD AND CORRUPTION POLICY

This document explains Cycling Ulster's Anti-fraud and Corruption Policy and the steps that must be taken where fraud is suspected or discovered. All staff should be aware of this while managers must bring its contents to the attention of their staff. Any person who becomes aware of any fraud, corruption or other illegal act and does not follow this policy could be subject to disciplinary action.

1. INTRODUCTION

1.1 One of the basic principles of public sector organizations is the proper use of public funds. It is therefore important that all those who work in the public sector are aware of the risk of and means of enforcing the rules against fraud and other illegal acts involving dishonesty, inappropriate Internet Use, or damage to property. For simplicity all such offences are hereafter referred to as "fraud", except where the content indicates otherwise. This document sets out Cycling Ulster's policy for detected or suspected fraud, and incorporates best practice within the field regarding counter-fraud measures and takes account of the latest legislation.

1.2 DEFINITIONS

Fraud is theft by deception. It is deliberate intent to permanently deprive a person or organization of money or goods through the falsification of any records or documents.

Corruption where someone is influenced by bribery, payment or benefit in kind to unreasonably use their position to give some advantage to another.

Other Irregularity – examples:-

Fraudulently misappropriating Cycling Ulster's funds, for example whilst managing teams and using the funds for personal gain.

Inappropriate use of Cycling Ulster equipment;

Theft includes any misappropriation, stealing, malicious damage, and actual or attempted break-in.

1.3 this Anti-Fraud and Corruption policy should be read in conjunction with the following Cycling Ulster/Cycling Ireland policies that also consider how to control and react to fraud and other illegal or dishonest acts:-

1.3.1 Disciplinary Policy and Procedure.

1.3.2 Anti-Bullying and Harassment Policy.

All the above policies are available from the Cycling Ulster Executive.

1.4 Cycling Ulster already has procedures in place that reduces the likelihood of fraud occurring. These include Cycling Ireland Rules and Regulations, Cycling Ulster Managers Handbook, documented procedures and a system of internal control and a system of risk assessment. In addition Cycling Ulster tries to ensure that a risk (and fraud) awareness culture exists in the organisation.

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1.5 Cycling Ulster Executive hold primary responsibility for these measures, although it is recognized that all Cycling Ulster officers and staff have a part to play in ensuring their efficiency. It is expected that Cycling Ulster officers, staff and volunteers at all levels will lead by example in acting with the utmost integrity and ensuring adherence to all relevant regulations, policies and procedures. A culture of openness, honesty and probity is strongly encouraged .

1.6 The Treasurer/Finance Committee are required to report and keep the Cycling Ulster Executive informed of any fraud cases that comes to light.

2. CYCLING ULSTER POLICY

2.1 Cycling Ulster is absolutely committed to maintaining an honest, open and well-intentioned atmosphere within the organisation. It is therefore also committed to the elimination of any fraud and to the rigorous investigation of any such cases.

2.2 Cycling Ulster expects anyone having reasonable suspicions of fraud to report them. It recognizes that whilst cases of theft are usually obvious, there may only be a suspicion of fraud and thus staff/members must report any concerns to the Executive who can then ensure that the Cycling Ulster’s procedures are followed.

2.3 It is also Cycling Ulster’s policy, which will be rigorously enforced, that no employee or volunteer will suffer in any way as a result of reporting reasonably held suspicions. All members can therefore be confident that they will not suffer in any way as a result of reporting reasonably held suspicions of fraud. For these purposes “reasonably held suspicions” shall mean any suspicions other than those which are raised maliciously and found to be groundless.

3. ROLES AND RESPONSIBILITIES

3.1 This section states the roles and responsibilities of Cycling Ulster staff and/or officers in reporting fraud or other irregularities.

STAFF

3.1 Employees are expected to act in accordance with Cycling Ulster’s/Cycling Ireland’s standards of Business Conduct and to follow guidance on the receipt of gifts or hospitality, available from line managers or personnel. Employees also have a duty to protect the assets of Cycling Ulster, including information and goodwill as well as property.

3.2 Cycling Ulster place an obligation on all members to act in accordance with best practice. Cycling Ulster officers are subject to the same high standards of accountability, and are required to declare and register any interests that might potentially conflict with those of the Cycling Ulster.

MANAGERS

3.3 Team Managers and Officers in Charge must be vigilant and ensure that procedures to guard against fraud are followed. They must try to establish an anti-fraud culture within their team and ensure that information on procedures is made available.

3.4 The Executive, Team Managers and Officers in Charge, should be alert to the possibility that unusual events or transactions could be symptoms of fraud. Where they have any doubt they must investigate.

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3.5 All cases of theft whether of Cycling Ulster or visitor property must be reported to the Executive Chairperson and Treasurer.

3.6 Where employees have access to the Internet, the Executive need to ensure that any use is appropriate to their job, and any private use specifically agreed beforehand.

3.7 Any instance of deliberate viewing of offensive material (e.g. pornography, or hate material) must be reported immediately.

3.8 Team Managers/Officers in Charge are required to provide the Executive with full and complete reports regarding all events for which funding has been awarded or equipment used. It is also incumbent on them to produce an accurate expense account with proper receipts.

INTERNAL AUDIT

3.8 An Internal Audit will evaluate the systems used to control Cycling Ulster's activities. Where any system weaknesses are identified they will undertake additional testing to determine if a fraud has taken place.

3.9 An Internal Audit can also provide specialist advice on counter-fraud matters, both investigating and suspicious or actual incidents and, or providing publicity either running fraud workshops or providing presentations.

HUMAN RESOURCES

3.10 The Executive Chairperson will liaise with the Treasurer and relevant managers where an employee or a volunteer is suspected of being involved in fraud or corruption. The Chairperson is responsible for ensuring the appropriate use of the Cycling Ulster's/Cycling Ireland's Disciplinary Procedure, and will advise those involved in the disciplinary process as to the procedures which will be followed.

3.11 The Chairperson must take steps at recruitment to establish, as far as possible, the previous record of potential staff in terms of their propriety and integrity. In this regard, temporary and 'fixed term' contract staff are treated in the same manner as permanent staff.

INFORMATION AND COMMUNICATIONS TECHNOLOGY

3.12 The Chairperson must be informed in all cases where there is a suspicion that IT is being used for fraudulent purposes. This includes inappropriate Internet or e-mail.

3.13 Any decision on what may be regarded as inappropriate will be referred to the Executive Board.

4. REPORTING FRAUD CORRUPTION OR OTHER ILLEGAL ACTS

4.1 This section outlines the **action to be taken** where fraud, corruption or other illegal acts involving dishonesty, inappropriate Internet use, or damage to property are discovered or suspected. For completeness it also deals with the action to be taken where theft is discovered or suspected.

4.2 Reporting of all frauds and irregularities is essential to ensure:

- consistent treatment of information;

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- proper investigation by an independent and experienced team;
- the optimum protection of the Cycling Ulster’s interests.

5. FRAUD AND CORRUPTION

5.1 Any actual or suspected instance must be reported to the Executive Chairperson immediately. Staff/volunteers must discuss their suspicions or what they have discovered with one of the following:

- Executive Chairperson
- Treasurer
- A member of the Executive Board (but only in cases involving the Executive Chairman)

5.2 These officers will treat inquiries confidentially and anonymously if so requested. Where someone feels unable to inform any of the above, Cycling Ireland (The Governing Body of Cycling in Ireland.) should be contacted. As a last point of contact, where so relevant, Sport Northern Ireland (SNI) should be made aware of the situation.

6. THEFT

6.1 This must be reported to the Executive Chairperson. An incident form must be completed.

7. OTHER MEANS OF REPORTING

7.1. If an employee/volunteer suspects a team manager, they should report the suspicions to someone more senior. If the suspicion involves the Chairman of the Executive Board, the matter must be reported to Cycling Ireland (The Governing Body of Cycling in Ireland.) As a last point of contact, where so relevant, Sport Northern Ireland (SNI) should be made aware of the situation.

8. TIMELINESS

8.1 It is essential that all staff/volunteers act at the time of their concerns, as time is likely to be of the utmost importance to prevent further loss to the Cycling Ulster. However, there should be no confrontation with the suspected person nor contact the police directly; they must contact one of the persons listed in paragraph 5.1 in the first place. Documentation should be kept of anything that arouses their suspicions.

9. DISCIPLINARY ACTION

9.1 The disciplinary procedures of Cycling Ulster/Cycling Ireland will be followed where an employee is suspected of being involved in a fraudulent or illegal act. This may include dismissal or license removal.

Chairman



Tommy Lamb

Honorary Treasurer



Oliver Hunter

Executive Officer



Anthony Mitchell

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