



CONFLICT OF INTEREST POLICY

Priority 1 Governance Document

Organisation	FND Connect
Status	Unincorporated Non-Profit Organisation
Address	133 Fable Lane, Kingswood, Hull, HU7 3PT
Document Code	FND-CONF-001
Version	1.0
Adopted	01/05/2026
Approved By	Matthew Gerdes-Hansen, Chair; Emma Wilder, Secretary
Review Cycle	As stated in this document

Controlled document. This policy should be read together with the FND Connect Constitution v1.0 and any supporting procedures adopted by the Management Committee.

Document Control

Owner	FND Connect Management Committee
Lead Responsible Person	As specified within this document
Adoption Date	01/05/2026
Review Cycle	Every 3 years - next review 01/05/2029
Linked Constitution	FND Connect Constitution v1.0
Applies To	Committee Members, officers, volunteers, advisers, representatives and anyone acting

This document is drafted for FND Connect's current status as an unincorporated non-profit organisation and should be reviewed when FND Connect incorporates as a Community Interest Company, Charitable Incorporated Organisation or other legal entity.

1. Purpose

1.1 This Conflict of Interest Policy protects FND Connect from decisions being influenced, or appearing to be influenced, by personal interests.

1.2 The Policy supports transparency, accountability, funder confidence and proper stewardship of organisational assets.

1.3 It applies to actual, potential and perceived conflicts of interest.

2. Scope

2.1 This Policy applies to Committee Members, officers, volunteers, advisers, contractors and anyone involved in decision-making for FND Connect.

2.2 It applies to financial, personal, professional, family, organisational and reputational interests.

2.3 It applies whether or not the person believes they can act impartially.

3. Definition of Conflict

3.1 A conflict of interest arises where a person's personal interests, duties to another organisation, relationships or financial interests may influence, or appear to influence, their judgement on behalf of FND Connect.

3.2 A Connected Person includes a spouse, partner, civil partner, child, parent, sibling, close family member, business partner, employer, company or organisation controlled by or associated with the person.

4. Examples

4.1 Examples include:

- Matthew or Emma being paid for web development, design, SeizeControl/app development, administration, project management, training or resource creation.
- A Committee Member's business supplying goods or services.
- A family member applying for paid work or grant-funded support.
- A volunteer seeking personal fundraising through FND Connect channels.
- A clinician adviser having commercial or research interests relevant to FND Connect resources.
- A Committee Member sitting on another organisation with competing or overlapping interests.

5. Duty to Declare

5.1 Conflicts must be declared as soon as they are known.

5.2 Declarations shall be made before discussion or decision.

5.3 Declarations shall be recorded in minutes or a conflict register.

5.4 Failure to declare a material conflict may be treated as misconduct.

6. Managing Conflicts

6.1 The conflicted person must not participate in the decision unless the Committee decides limited factual input is necessary.

6.2 The conflicted person must not vote on the matter.

6.3 The decision must be made in the best interests of FND Connect.

6.4 The Committee must consider whether the arrangement is reasonable, necessary, proportionate and comparable to market value.

6.5 The decision and reasoning must be recorded.

7. Payments to Founders, Committee Members and Connected Persons

7.1 Paid work by Matthew Gerdes-Hansen, Emma Wilder or any Connected Person is permitted only where:

- the conflict is declared;
- the work is genuinely required;
- the price is fair and comparable to market rates;
- the arrangement is in FND Connect's best interests;
- approval is given by non-conflicted decision-makers where possible;
- the decision is fully documented.

7.2 This applies to web development, graphic design, SeizeControl/app development, administration, project management, training, content creation, consultancy and any other paid services.

8. Where Both Current Committee Members Are Conflicted

8.1 As FND Connect currently has two founding Committee Members, situations may arise where both are conflicted.

8.2 In such cases, an independent adviser should be consulted where reasonably practicable.

8.3 The Committee must document why the arrangement is necessary, why alternatives are not preferable, the market comparison, the decision made and the safeguards applied.

8.4 The arrangement should be reviewed periodically.

9. Register of Interests

9.1 FND Connect shall maintain a Register of Interests.

9.2 Committee Members shall review their declarations at least annually.

9.3 Material changes must be reported promptly.

9.4 The Register may be kept electronically.

10. Breach

10.1 Breach of this Policy may result in warning, suspension, removal from role, repayment, cancellation of arrangement or other action considered appropriate.

10.2 Serious conflicts, dishonesty or private benefit may be reported to funders, banks, regulators or law enforcement where appropriate.

11. Review

11.1 This Policy shall be reviewed every three years, or sooner if required by organisational growth, incorporation, funding requirements or a material conflict issue.

11.2 The next scheduled review date is 01/05/2029.

Approval and Adoption

This Conflict of Interest Policy was approved and adopted by the Management Committee of FND Connect on 01/05/2026.

The document shall remain in force until amended, replaced or withdrawn by the Management Committee.

Signed by	Role	Signature	Date
Matthew Gerdes-Hansen	Chair		01/05/2026
Emma Wilder	Secretary		01/05/2026