

Conflict of Interest, Gifts, Hospitality and Anti-Bribery Policy

FASD HUB South West / FASD Informed UK™

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1. Policy statement

FASD HUB South West, trading as FASD Informed UK™, is a Community Interest Company (CIC) and must act for community benefit, protect its assets and maintain public confidence. We will identify, declare, record and manage actual, potential and perceived conflicts of interest before they influence decisions. We do not prohibit relevant lived, professional or community experience; we use transparent safeguards so that valuable knowledge can inform work without compromising impartiality, safeguarding, value for money or the organisation’s interests.

2. Purpose and scope

This policy applies to directors, members, employees, workers, volunteers, students, consultants, contractors, advisers, panel members and anyone acting for or representing the organisation. It covers Board and committee decisions, recruitment, procurement, commissioning, grants, partnerships, sponsorship, fundraising, donations, payments, expenses, employment, volunteering, use of information or opportunities, events, research, training and any transaction or arrangement involving the CIC.

3. Principles

- Act within the CIC’s constitution, for proper purposes and in the best interests of the company and its community benefit.
- Declare early and when circumstances change; if in doubt, disclose and seek advice.
- Apply the reasonable-person test: could an informed member of the public reasonably think the interest might influence the person’s judgement?
- Manage perception as well as actual influence.
- Do not use organisational information, property, position or opportunity for personal or connected-person advantage.
- Ensure decisions remain quorate, evidence-based, proportionate and properly recorded.
- Protect people from retaliation for raising a concern in good faith.
- Use accessible, FASD-informed processes without blame or unnecessary disclosure.

4. Definitions

An **actual conflict** exists where a person’s private interest or duty to another person is influencing, or is likely to influence, an organisational decision. A **potential conflict** could arise in future. A **perceived conflict** exists where an informed reasonable person could think judgement may be affected, even if it is not.

An **interest** may be financial or non-financial, direct or indirect. It includes employment, ownership, investments, contracts, debts, gifts, hospitality, trusteeships, directorships, memberships, close personal relationships, family connections, loyalties, professional roles, public positions, competing duties, access to confidential information and opportunities that could benefit the person or someone connected to them. A **connected person** includes a partner, close family member, household member, close personal associate, business associate or an organisation with which the person has a significant relationship.

- A director, worker or volunteer can benefit from a proposed payment, contract, grant, job or opportunity.
- A close relative, friend, employer, client, funder, supplier or organisation linked to the decision-maker may benefit.
- A person is involved with both organisations in a partnership, tender, referral or funding decision.
- A director participates in deciding their own remuneration, expenses, performance, appointment or contract.
- Confidential information, contacts, intellectual property, lived-experience material or an organisational opportunity could be used privately.
- A gift, hospitality, donation, sponsorship or favour may create an obligation or appearance of influence.
- Personal beliefs, disputes, loyalties or advocacy roles could make impartial judgement difficult.

A declared interest is not automatically wrongdoing. The failure to disclose or properly manage it may be. Relevant expertise or lived experience may be retained in a decision only where the benefit, safeguards and reasons are documented and the person does not improperly influence the outcome.

5. FASD-informed and accessible declarations

Declarations and conflict discussions will use plain, concrete and non-shaming language. The organisation will not assume that a person understands terms such as indirect interest, connected person or perceived conflict without explanation. Support may include examples, a visual or written prompt, one question at a time, extra processing time, help to complete a form, a trusted supporter, reminders before meetings and an opportunity to correct the record. Forgetfulness, delayed recall or a need for support will be addressed through clarification and proportionate safeguards; deliberate concealment or misuse will be handled separately. No person must disclose a diagnosis, prenatal alcohol information, trauma or family history merely to receive an adjustment.

6. Responsibilities

The Board holds overall accountability and will act in accordance with the Companies Act 2006, the CIC's articles and the community interest test. Directors must act within powers, promote the success of the company for community benefit, exercise independent judgement and reasonable care, avoid unauthorised conflicts, refuse improper benefits and declare interests in proposed or existing transactions. The Board appoints a Conflict of Interest and Compliance

Lead to maintain registers, issue reminders, advise on management plans and provide assurance.

Everyone covered by this policy must identify and disclose relevant interests, gifts, hospitality, offers, lobbying, benefits and changes promptly; follow agreed restrictions; protect confidential information; and report suspected bribery, fraud, improper influence or unmanaged conflicts. Chairs and decision leads must invite declarations, decide or obtain a decision on management, protect quorum and record the process. No conflicted person may decide how their own conflict will be managed.

7. Declarations and registers

Directors, staff with decision-making authority and any other role identified by the Board will complete a declaration on appointment and at least annually, including a nil return. Volunteers and advisers will declare interests relevant to their duties rather than provide disproportionate private information. Everyone must update a declaration promptly when circumstances change and declare a matter-specific interest before discussion or action. The central Register of Interests will record the person, nature and date of the interest, affected decision, management action, authoriser, review date and closure. Relevant related-party information will be included in accounts or the CIC report where required.

8. Managing conflicts in decisions and meetings

Every agenda will include declarations of interest. A person must declare the nature and extent of an interest before receiving confidential papers, advising, discussing, recommending, voting, approving or implementing the matter. The chair or another conflict-free authorised person will apply the constitution and decide whether the person may: receive limited information; provide factual information and then withdraw; remain but not vote; withdraw for the whole item; or take no part in preparation, decision or implementation. The minutes will record the declaration, decision, reasons, departure and return, people present, quorum and outcome. The conflicted person is not counted in quorum or voting where the articles or management decision require exclusion.

9. Authorisation and insufficient quorum

A director's conflict may be authorised only where the Companies Act 2006 and the CIC's articles permit it. Only genuinely independent directors may participate in authorisation. They will record the conflict, benefits and risks, alternatives, conditions, duration and review. If there are too few conflict-free directors to decide or remain quorate, the matter must not proceed until the constitutionally correct route is confirmed. This may require member approval, appointment of an independent director or panel, independent professional advice, or another lawful process. Urgency alone does not permit a conflicted decision.

Written resolutions, delegated decisions, email approvals and informal discussions are subject to the same declaration, exclusion, quorum and recording rules as meetings. A decision must not be divided, delayed or moved outside a meeting to avoid scrutiny.

10. Procurement, funding, contracts and partnerships

People connected to an applicant, bidder, supplier, consultant, partner, sponsor, grant recipient or employee must not shape specifications, provide inside guidance, score, rank, negotiate, approve, sign, monitor or communicate the outcome unless a conflict-free decision-maker has expressly documented a limited factual role. Funding and procurement decisions will use published criteria, proportionate competition or a recorded single-source justification, independent scoring, value-for-money and community-benefit assessment, due diligence and written approval. All bidders and applicants will receive materially equivalent information. Lobbying or attempted influence must be reported and recorded.

11. Payments, benefits and related parties

Any payment, employment, contract, benefit, loan, asset transfer or reimbursement involving a director or connected person must be legally permitted, consistent with the articles and asset lock, demonstrably in the CIC's interests and approved by conflict-free decision-makers. The organisation will obtain market or comparable evidence where proportionate, record the terms and reasons, ensure the beneficiary takes no part in approval, and make required disclosures in accounts or the CIC report. Directors must not decide their own remuneration, expenses or performance arrangements.

A conflicted person must not participate in prioritising or ranking grants, contracts or opportunities merely because the conflict is known to others. Declaration alone is not a control. Any retained participation must be necessary, limited, authorised by conflict-free decision-makers and documented with safeguards that prevent influence over the outcome.

12. Gifts, hospitality, donations and sponsorship

- Cash, cash equivalents, personal discounts, loans or secret commissions must never be offered or accepted.
- Gifts or hospitality must not be solicited and must be refused where intended, or reasonably perceived, to influence a decision or reward favourable treatment.
- Modest, infrequent and proportionate hospitality connected to legitimate organisational activity may be accepted only where lawful and not embarrassing if publicly known.
- All gifts, hospitality, benefits, donations or sponsorship offered, accepted or declined with a value of £20 or more must be declared. Lower-value items must also be declared where repeated, linked to a decision or capable of creating influence.
- Prior approval is required for travel, accommodation, event tickets or hospitality above £50, or for any offer from a current bidder, applicant, supplier or regulated partner.
- The register will record donor, recipient, date, description, estimated value, purpose, decision, approver and any linked business.
- Organisational donations and sponsorship will be subject to due diligence, written terms, reputational and safeguarding review, and controls preventing donor influence over services or individual decisions.

13. Anti-bribery, fraud and improper influence

Bribery includes offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage to induce or reward improper performance. Facilitation payments, kickbacks and disguised benefits are prohibited. The organisation will maintain proportionate procedures based on top-level commitment, risk assessment, due diligence, communication and training, and monitoring and review. Higher-risk arrangements, intermediaries, overseas activity, unusual payment routes, urgent contracts and politically exposed connections require enhanced scrutiny and documented approval.

Suspected bribery, fraud, theft, false accounting, hidden commission, misuse of funds or deliberate concealment must be reported immediately to the Compliance Lead or a conflict-free director under the Whistleblowing Policy. Evidence must be preserved and no private investigation or confrontation undertaken. The organisation will manage immediate risk and contact the police, funder, insurer, regulator, professional body or other authority where appropriate. No person will suffer retaliation for a good-faith report.

14. Information handling, publication and confidentiality

Declarations will collect only information necessary to identify and manage conflicts, supported by an appropriate lawful basis and privacy information. Access to the full register is limited to authorised people. The organisation may publish or provide a proportionate summary of relevant director or decision-maker interests where required for transparency, accounts, CIC reporting, funders or regulators, but will not routinely publish home addresses, sensitive family details, health information or unnecessary financial data. Public inspection will be provided only where legally required or formally approved with privacy safeguards. Registers and decision records will be accurate, secure, reviewed and retained under the Data Protection Policy and retention schedule.

15. Breaches, concerns and remedies

A concern may be raised with the Compliance Lead, Chair, another conflict-free director or through the Whistleblowing Policy. The recipient will assess immediate risk, preserve evidence and decide who can investigate and determine the matter impartially. If senior leaders or most directors are implicated, the remaining conflict-free directors will appoint an independent investigator or obtain external governance or legal support. Outcomes may include advice, a revised management plan, correction of minutes or registers, repeating or setting aside a decision, repayment or recovery, removal of delegated authority, disciplinary or volunteer action, termination of a contract, director or member action under the governing documents, and referral to a regulator or law-enforcement body. The organisation will distinguish inadvertent error from reckless or deliberate concealment while protecting community benefit and public trust.

16. Training, assurance and review

Induction and annual refreshers will explain conflicts, connected people, gifts and hospitality, bribery risks, decision controls, accessible declarations and reporting routes. Before each

meeting or material decision, the responsible lead will provide a declaration prompt. The Compliance Lead will review registers at least quarterly, follow up missing or overdue declarations, sample decisions and report significant risks, breaches, related-party matters and overdue actions to the Board at least annually. This policy will be reviewed by 1 September 2027 and sooner after a significant breach, audit finding, change in activities or relevant legal or regulatory development.

17. Legal framework and related policies

- Companies Act 2006, including directors' general duties and declarations of interests in transactions or arrangements.
- Companies (Audit, Investigations and Community Enterprise) Act 2004 and Community Interest Company Regulations 2005.
- Bribery Act 2010 and Ministry of Justice guidance on procedures to prevent bribery.
- Fraud Act 2006, Theft Act 1968 and applicable accounting and reporting requirements.
- Data Protection Act 2018 and UK General Data Protection Regulation.
- The CIC's articles of association, asset-lock obligations and current guidance from the Office of the Regulator of Community Interest Companies.
- This policy should be read with the Articles, Financial Controls, Procurement, Expenses, Whistleblowing, Data Protection, Safeguarding, Donations and Sponsorship, Disciplinary and Volunteer policies.

Appendix 1: Declaration of interests

Name	
Role	Director / member / employee / volunteer / contractor / other
Declaration period	
Employment, business, directorships or trusteeships	Include organisations, roles and dates relevant to the CIC.
Ownership, investments, contracts or financial interests	Include relevant direct and indirect interests.
Memberships, advisory, public or advocacy roles	
Connected-person interests	Describe only what is necessary to identify and manage the conflict.
Gifts, hospitality, sponsorship, donations or other benefits	State whether offered, accepted or declined, estimated value and linked business.
Use of organisational information, property or opportunities	

Other actual, potential or perceived conflicts																	
Nil return	I have no interests to declare: Yes / No																
Declaration	I confirm that this information is accurate and complete to the best of my knowledge. I will update it promptly if circumstances change and comply with any agreed management action.																
Signature and date																	
Management decision	No action / information restriction / factual input only / no discussion / no vote / withdrawal / delegated restriction / other																
Authoriser, reasons and review date	Appendix 2: Gifts and hospitality declaration <table border="1"> <thead> <tr> <th colspan="2">Name and role</th> </tr> </thead> <tbody> <tr> <td>Date offered or received</td> <td></td> </tr> <tr> <td>Person or organisation offering</td> <td></td> </tr> <tr> <td>Description and estimated value</td> <td></td> </tr> <tr> <td>Business or decision linked to the offer</td> <td></td> </tr> <tr> <td>Accepted, declined, returned or donated</td> <td></td> </tr> <tr> <td>Prior approval required or obtained</td> <td></td> </tr> <tr> <td>Decision, reasons and approver</td> <td></td> </tr> </tbody> </table> Approved on behalf of FASD HUB South West, trading as FASD Informed UK™, on 7 August 2026. © FASD Informed UK™ / FASD HUB South West 2026. All rights reserved.	Name and role		Date offered or received		Person or organisation offering		Description and estimated value		Business or decision linked to the offer		Accepted, declined, returned or donated		Prior approval required or obtained		Decision, reasons and approver	
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