

Responsible Gambling Strategy Board – Conflicts of Interest Policy

1. Background

- 1.1 The credibility and impact of the Responsible Gambling Strategy Board (the Board) depends on the independence and objectivity of its advice to the Gambling Commission and on the confidence of others in its integrity. It is important therefore that in their Board activities members abide by the highest standards of behaviour, as set out in the Seven Principles of Public Life¹.
- 1.2 Key to this is the handling and transparency of any potential conflicts of interest. Members of the Board have a range of professional and personal connections. These connections can bring benefit to the work of the Board. They can often be part of the reason they have been asked to join in the first place. On occasion, however, they can give rise to actual or perceived conflicts of interest. The existence of a conflict of interest does not reflect on the integrity of the affected member, provided it is properly addressed.
- 1.3 Board members are responsible individually for:
- Ensuring that they are familiar with this policy on handling conflicts of interest and that they comply with these rules.
 - Ensuring that any potential conflict of interest is identified and appropriately addressed at an early stage.
 - Declaring conflicts of interest which affect them; and
 - Completing and updating an annual register of interest statement, kept by the Board Secretary and publicly available on the Board's website.
- 1.4 In any case of doubt about the appropriate action in relation to a potential conflict of interest the Chair of the Board and the Secretary should be consulted at the earliest possible stage.

2. Definition

- 2.1 A conflict of interest is any situation in which a member of the Responsible Gambling Strategy Board's personal interests or loyalties could, or could be seen to, prevent them acting independently and objectively and on the basis of the evidence.
- 2.2 Conflicts of interest may arise:
- Through a potential financial or non-pecuniary benefit from an activity relating to gambling, either directly or indirectly through a connected person.
 - When a Board Member's duty to the Board may compete with a duty or loyalty they owe to another organisation or person.
- 2.3 Potential conflicts could arise if, for example, Board members:
- Undertake work for an organisation within or related to the gambling sector.
 - Have other financial interests in the gambling sector.

¹ [The 7 Principles of Public Life, Committee on Standards in Public Life](#)

- Bid for research included in the Research Programme developed by the Board.
- Accept gifts or hospitality from organisations within the gambling sector.
- Accept outside appointments which might be thought to be relevant to the gambling sector.

3. Direct payments from the gambling sector

- 3.1 Members of the Board should not receive payment from gambling operators licensed in the UK for work undertaken or for other reasons.
- 3.2 Care should be taken even about undertaking such work on an unpaid basis, lest it give rise to a perception, however unwarranted, that some future benefit will be provided in return, at a later date.
- 3.3 There is no objection, however, to:
- Reimbursement of reasonable expenses incurred, for example, while speaking at industry conferences on safer gambling issues.
 - Members working on data supplied by gambling operators for the purpose of research where any potential indirect benefit to the industry is not the prime objective and where the funding, if any, does not come from the operators.
- 3.4 The Board secretariat will keep a register of any such instances described above (paragraph 3.3).
- 3.5 Other exceptions to this rule may be agreed very occasionally on de minimis grounds, for example where a member of the Board has an expertise not available elsewhere in areas where the Board is unlikely to take a significant interest. Such cases are likely to be extremely rare and should always be discussed with the Chair in advance.

4. Other financial interests

- 4.1 Board members should not have direct shareholdings in companies operating in the gambling industry. This restriction extends to close family members. It does not include funds where the precise composition of holdings is not visible to investors, or where investors have no control over individual investment decisions.
- 4.2 The only exception to this rule is where a Board member has been appointed specifically because of their industry expertise and where it may be difficult for them to divest particular holdings immediately. Even then, the member concerned should do everything they can to minimise the extent of their interest, and divest themselves of it, as soon as possible. They should also be scrupulous about declaring it in the public register of interests.

5. Research

- 5.1 The Board benefits greatly from the presence of one or more members who are, or have been, active researchers in the gambling area. There is no objection, and some advantage, to such members continuing their research activities while members of the Board. Ideally these activities would be funded outside the tripartite arrangements. But that will not always be possible. Research commissioned by GambleAware in pursuit of the Research Programme set by

the Board to underpin the National Responsible Gambling Strategy forms a major part of all gambling-related research in the UK. In some important areas of research, a Board member may, in a small field, be the individual best suited to undertake it.

- 5.2 To prevent any real or perceived conflict of interest, where a Board member anticipates that he or she might wish to tender for a GambleAware commissioned project they should declare that at the earliest opportunity and exclude themselves from any discussion on the research brief. In the absence of this happening, the Board member concerned will not be permitted to tender for the project without resigning from the Board. A register of such declarations will be kept by the Board Secretary.
- 5.3 GambleAware has arrangements to ensure that no advantage is given to Responsible Gambling Strategy Board members in considering tenders for individual projects. There is an independent peer review process and independent trustees are ultimately responsible for taking funding decisions.
- 5.4 It is important that Board members tendering for projects do not derive, or are thought to derive, an advantage from their role in determining the overall Research Programme. Protection against this is provided by the fact that the Research Programme is determined by the information requirements of the National Responsible Gambling Strategy, which has been agreed by a wide range of stakeholders. The strategy is also itself subject to consultation before completion. The views of other academics and researchers are sought both directly and through a workshop set up for the purpose. The strategy is kept under continuous review. The Board welcomes views on it at any time.

6. Gifts and hospitality

- 6.1 Board members are encouraged to increase their understanding of the gambling sector, including by contacts with a wide range of organisations and stakeholders. In doing so, they should maintain high standards of honesty and integrity.
- 6.2 To avoid any suggestion of impropriety, Board members must not accept any gifts from the gambling sector or individuals or organisations relating to it. This does not include low value practical items which are given out freely, such as stationery items provided as part of attendance at a conference.
- 6.3 A common-sense approach should be taken to offers of hospitality. In a number of settings such as routine meetings, establishing new contacts or undertaking wider stakeholder engagement, acceptance of hospitality should not be problematic. Examples may be lunch or light refreshments where these are incidental to engagement with stakeholders. The questions Board members should consider are whether acceptance of hospitality could be perceived to create an obligation and whether a reasonable person might think that acceptance could influence the member's judgement in relation to a piece of advice.

7. Outside appointments

- 7.1 Board members should avoid conflicts of interests arising from acceptance of outside appointments during their tenure as a Board member. If Board members intend to take up any appointment which might be thought to relate to gambling in any way, they should notify the Chair. The Chair will determine whether holding it at the same time as Board membership would be appropriate, taking advice if necessary from the Gambling Commission.

8. Procedure at meetings

- 8.1 Board members should declare any relevant personal or business interest which may, or may be perceived by a reasonable member of the public, to influence their judgement at the beginning of the relevant item of business. This declaration should include such interests of close family members and of people living in the same household².
- 8.2 Where there is a conflict, the Board member must withdraw from the meeting whilst that matter is discussed, unless expressly invited to remain solely in order to provide information.
- 8.3 All decisions under a conflict of interest will be recorded by the note taker of the meeting and reported in the minutes.

9. Speaking engagements and social media

- 9.1 Care should be taken about invitations to speak at conferences or elsewhere, in responding to media enquiries and in the use of social media. Members need to be clear on all these occasions if they are speaking in a personal or a Board capacity. Members should never accept speaking invitations or communicate in a Board capacity in other ways without prior consultation with the Chair or the Secretary. The Board Secretary will liaise with the Gambling Commission communications team to ensure that maximum advantage is taken of the opportunity.
- 9.2 It is also helpful to inform the Secretary, and through him or her the communications team, about any public activities relating to gambling undertaken by Board members in a personal capacity. This is for information only.

10. Register of Interests

- 10.1 Members of the Board should complete an annual register of Interests statement. The register of interests will be published on the RGSB website.
- 10.2 The following interests should be declared:
 - employment by, or ownership or part-ownership of, businesses or consultancies;
 - employment by charities, public bodies or similar organisations;
 - directorships, including non-executive directorships of public or private companies;
 - significant (3 per cent+) shareholdings in public and private companies; and
 - membership of other bodies, whether public or private organisations, which may impinge directly or indirectly on the business of the Responsible Gambling Strategy Board; and public appointments.
- 10.3 Board members should include in the register details of any interest of a member of their close family which could be seen as, or which could give rise to, a conflict with their position on the Board.

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² Close family members include personal partners, parents, children (adult and minor), brothers, sisters and the personal partners of any of these.