

Advisory Board for Safer Gambling Conflicts of Interest Policy

1. Background

- 1.1 The credibility and impact of the Advisory Board for Safer Gambling (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 agreed principles, reflecting the Nolan Principles of Public Life (see Appendix 1).¹
- 1.2 One element of 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. 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 fully acknowledged, declared and if required, acted upon.
- 1.3 Board members should declare relevant interests at the start of each Board meeting. The Chair will decide whether any members should be excluded from parts of the discussion based on the interests they declare, or whether any further actions are required to manage a potential conflict of interest.
- 1.4 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; and
 - Completing and updating a register of interest statement, kept by the Head of Insight Expert Groups and publicly available on the Board's website.
 - Informing the Head of Insight Expert Groups and updating this public register throughout the year as new conflicts arise
- 1.5 In any case of doubt about the appropriate action in relation to a potential conflict of interest the Chair of the Board and the Head of Insight Expert Groups 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 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.

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

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.
- Membership of another body or committee that may give rise to actual or perceived conflicts of interest

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.
- Bid for research included in the Gambling Commission's Research Programme (which is advised on by ABSG).
- Accept gifts or hospitality from organisations within the gambling sector.
- Accept outside appointments which might be thought to be relevant to the gambling sector.
- Accept financial payment for research or consultancy work directly or via voluntary contributions from the industry.

3. Direct payments from the gambling sector

3.1 Members of the Board should not receive any payment from gambling operators licensed in the UK for work undertaken or for other reasons.

3.2 ABSG and the Gambling Commission advocate that reducing gambling harms should be approached as a public health issue. ABSG members, therefore, should not receive remuneration or reimbursement of expenses for speaking at conferences which receive direct funding from the gambling industry (including sponsorship). This approach is consistent with that taken in other areas of public health.

3.3 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.

3.4 There is no objection, however, to members working on anonymised 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.

3.5 The Board secretariat will keep a register of any such instances described in paragraph 3.4 above and members will declare these on their register of interests.

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.

5. Research

- 5.1 The ABSG benefits from the presence of one or more members who are, or have been, active researchers in the safer gambling area. There is no objection, and some advantage, to such members continuing their research activities while members of the Board.
- 5.2 It is important, however, that Board members tendering for projects do not derive, nor are perceived to derive, an advantage from their role as Board members. Board Members, therefore, should not bid to carry out work from the research programme they had a role in advising upon.
- 5.3 As a further protection, all discussion of the research agenda is reserved to a private session of ABSG meetings, from which members who are active researchers in safer gambling are asked to withdraw. They will not have access to meeting papers on this element of Board business.
- 5.4 We also note that ABSG has on record stated that gambling research should not be funded through voluntary contributions. Therefore, ABSG members are not expected to bid for research contracts where the source of funds is voluntary contributions from the gambling industry.
- 5.5 As identified in paragraph 11 below, arrangements for the funding of research in safer gambling is in transition. In recognition of this, Board members with existing contracts to undertake research that was allowed under the previous terms of reference of RGSB/ABSG but which would not be acceptable under this policy will be able to fulfil their contracts.

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 Board members must not accept any gifts from the gambling sector or individuals or organisations relating to it.
- 6.3 A common-sense approach should be taken to offers of hospitality. In a number of settings such as visits to operators, establishing new contacts or undertaking wider stakeholder engagement, acceptance of hospitality should not be problematic. Examples may be 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.

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 all 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 meeting. 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 should 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, which will be made available on the ABSG website.

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.
- 9.2 The Chair of ABSG is the sole public spokesperson for ABSG. If there are exceptions to this, will be agreed with the Chair of ABSG and the Gambling Commission in advance. Consistent with the Gambling Commission's approach to all other media and public affairs, the ABSG Chair should not accept speaking invitations or communicate in a Board capacity in other ways without prior mutual agreement with the Gambling Commission.
- 9.3 Board members need to be clear when speaking at conferences or elsewhere, in responding to media enquiries and in the use of social media that they are speaking in a personal capacity. They should avoid being presented in a way which could give the impression they are speaking on behalf of ABSG.
- 9.4 Members should inform the Head of Insight Expert Groups, and through them the Gambling Commission Communications Team, about any public activities relating to gambling they are to undertake. This is for information only – the Commission will not seek to influence what Board members say in public in a personal capacity.

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

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 ABSG website. New conflicts of interest must be declared as they arise and the Register will be updated with immediate effect on the 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, including research funding
- 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.

11. Review

11.1 This policy will remain in force for 12 months from the date of approval. This deadline for review has been imposed in recognition of the transition in place in the funding of gambling research.

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