

## **Responsible Gambling Strategy Board – Conflicts of Interest**

---

### **1. Background**

- 1.1 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 from making a decision only in the best interests of the Board.
- 1.2 Board members, in their duty to exercise proper stewardship over the body, are required to recognise and deal appropriately with conflicts of interest. Even the perception that there is a conflict of interest can damage the reputation of the Board.
- 1.3 Conflicts of interest usually arise where either: there is a potential financial or measurable benefit directly to an individual Board member, or indirectly through a connected person; or a Board member's duty to the Board may compete with a duty or loyalty they owe to another organisation or person. The existence of a conflict of interest does not reflect on the integrity of the affected Board member, so long as it is properly addressed.
- 1.4 Examples of potential conflicts could include where Board members:
  - undertake work for an organisation within the gambling sector; or
  - undertake external speaking engagements either in their capacity as a member of the Board or on behalf of their employer.
- 1.5 A Board member's loyalty to RGSB could conflict with, for example:
  - another organisation, such as their employer;
  - a member of their family; or
  - another connected person or organisation.
- 1.6 A conflict of loyalty could also arise where the religious, political or personal views of a Board member could interfere with their ability to decide the issue only in the best interests of the Responsible Gambling Strategy Board.

### **2. Role of Board members**

- 2.1 Members of the Responsible Gambling Strategy Board each have an individual personal responsibility to declare conflicts of interest which affect them.
- 2.2 Board members should also adopt safeguards to prevent conflicts of interests arising from acceptance of outside appointments during their tenure as a Board member. If Board members intend to take up any such appointments, they should notify the Chair, who will then determine whether holding such an appointment would be appropriate, taking advice if necessary from the Gambling Commission.
- 2.3 It is the responsibility of Board members to ensure that they are familiar with this policy on handling conflicts of interests and comply with these rules.

### **3. Procedure at meetings**

- 3.1 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 any conflicts of interest. This should include, as a minimum, personal direct and indirect pecuniary interests, and should normally also include such interests of close family members and of people living in the same household<sup>1</sup>.
- 3.2 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.
- 3.3 All decisions under a conflict of interest will be recorded by the note taker of the meeting and reported in the minutes.
- 3.4 Independent external moderation may be used where conflicts cannot be resolved through the usual procedures. In the case of grave or repeated conflicts of interest between the RGSB and a Board member, it may be that, in the best interests of the RGSB, the individual has no option but to resign from his or her position.

### **4. Register of Interests**

- 4.1 Members of the Board should complete an annual Register of Interests Statement. The register of interests will be kept up-to-date by the Secretary to the Board and published on the RGSB website.
- 4.2 All interests, as well as any actual and potential conflicts of interest should be included in the Register. In this context 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%+) shareholdings in public and private companies;
  - 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.
- 4.3 Board members should include in their Register details of any interest (or those of a member of their family) which could be seen as or which could give rise to a conflict with your position on the Board.

---

<sup>1</sup> Indirect pecuniary interests arise from connections with bodies which have a direct pecuniary interest or from being a business partner of, or being employed by, a person with such an interest. Non-pecuniary interests include those arising from membership of clubs and other organisations. Close family members include personal partners, parents, children (adult and minor), brothers, sisters and the personal partners of any of these.