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1. Introduction

GamCare's overall mission is to support those affected by problem gambling and to minimise gambling-related harm. We recognise that in pursuit of this goal we will encounter conflicts of interest which have the potential to impact on the ability of our trustees and staff to act, and to be seen to act, only in the best interests of the charity and our beneficiaries. GamCare is highly alert to this risk of undue influence, and we are proactive in identifying and addressing any threat to the independence and impact of our work, including specific consideration of our work with service users, contracted delivery partners and gambling operators.

This policy sets out our approach to managing this risk in order to maintain the public and professional trust required to further our mission. It details the responsibilities placed on all GamCare trustees and staff to act with integrity and transparency in furtherance of our charitable mission, and the measures we use to assure compliance.

2. Policy Scope

The aims of this policy are to ensure that GamCare:

- Takes all decisions and actions with integrity, and in the interests of reducing gambling-related harms, in line with our mission, strategic priorities and values
- Is open and honest about any personal and professional interests and loyalties which may influence, or be seen to influence, our decisions and actions
- Has clear, widely-communicated and well-documented systems for the identification and management of actual and potential conflicts of interest, including prompt action regards any breach of this policy

3. Definitions

A conflict of interest is any situation in which any individual's interests or loyalties could prevent, or be perceived to prevent, them from making judgements and taking actions only in the best interests of GamCare and its beneficiaries. Conflicts of interest may occur due to:

- **Direct or indirect financial interests** where an individual, their close associate, or a company to which they are connected, may receive financial benefit, for example regards the award of funding, grants and contracts. Close associates include spouse, partner, family and close relatives, business partners.
- **Non-financial professional or personal interests** where an individual may receive professional or personal benefit, such as increased reputation, status and profile, for example regards memberships, research and advocacy roles.
- **Competing loyalties** where an individual's loyalty or duty to another person or organisation, or to their own personal, political or religious beliefs, may prevent them from making judgements only in the best interest of the charity, for example in decisions regards recruitment, funding allocation or work planning.

4. Considerations

GamCare is a charity working to provide gambling-related treatment and support, and to reduce the harms associated with gambling. This policy has been developed in specific consideration of the potential for conflicts of interest within the following areas of work:

- Our frontline work with individuals and family members affected by or at risk of problem gambling, via the delivery of specialist, evidence-based interventions
- Our lead provider role to a network of delivery partners which enhances the scale and reach of our joint work, and to whom we provide grant funding and leadership support
- Our receipt of funds from the gambling industry, in line with current national funding arrangements for the delivery of prevention and support for problem gambling
- Our work with gambling operators to provide access to the Safer Gambling Standard, our independent, assessment-based social responsibility accreditation, and training of customer facing staff in customer interaction.
- Our strategic partnerships work to build knowledge and excellence in gambling treatment and support, in collaboration with government, the NHS, gambling support providers, and individuals affected by problem gambling

5. Responsibilities

GamCare's specific expectations regards conflicts of interest are set out below, in relation to staff, service users, third parties, and hospitality and gifts:

6. GamCare Staff

All staff are responsible for upholding GamCare's reputation, which includes recognising and acting on conflicts of interest to maintain objectivity and integrity. All staff, including trustees, employed staff, volunteers and other workers, such as agency staff and contractors, must:

- Act in line with the duties of a GamCare employee, as set out in, for example, job descriptions, contracts and handbooks, which includes the responsibilities to avoid conflicts of interest, to act only in the best interests of the charity and its beneficiaries, and to comply with all required policies and procedures.
- Declare all potential conflicts of interest as defined, acting openly, transparently and in line with all relevant management systems. Based on the level of decision-making responsibility held, trustees and senior managers must declare all conflicts via the Register of Interests; all other staff must declare conflicts to their line manager, with onward reporting to senior management where a significant risk is identified.
- Notify their line manager, the Director of Finance and Resources, or the Chair (as appropriate) if aware of any undeclared conflict of interest affecting any member of GamCare's staff.
- Not benefit financially from the charity in addition to any agreed role remuneration, for example via the exchange of assets, or payment to any closely connected company or individual, for example in the provision of services or employment.
- Not directly benefit financially from the gambling sector, for example via personal shareholdings, and to declare any indirect interests, for example company pensions from past employment within the industry. Due to the existing background of current trustees a transitional period is required to achieve this commitment, and this will be managed within the usual cycle of trustee appointments.

In addition, GamCare's trustees hold a personal legal duty to avoid conflicts of interest and to act in the best interest of the charity, as per the Charities Act 2011 and the Companies Act 2006.

7. Service Users

All prevention, support and treatment work is undertaken in line with GamCare's detailed operational policies, which include management of confidentiality and professional boundaries. All staff in service user contact are required to identify and manage potential conflicts of interest, including informing line management and agreeing strategies as required. Examples include:

- **Direct Support:** where direct treatment and support is being provided staff must be alert to potential conflicts such as pre-existing relationships (staff: client and client: client), or any personal or professional interests which conflict with putting the client's interests first.
- **Service User Involvement:** where individuals are engaged in involvement activity such as volunteering and consultation, staff must be alert to potential conflicts of interest such as pre-existing relationships (volunteer: client), or opportunities to influence service provision to exclusive personal advantage.

8. Third Parties

GamCare undertakes joint work with delivery, research, strategic and industry partners to support delivery of our mission. We receive income via grants, donations and paid-for services, and provide grants to our network partners. We recognise that all these delivery and funding relationships may be subject to conflicts of interest and undue influence, and our trustees and senior leaders hold the responsibility to identify and manage this. Examples include:

- **Gambling Industry Funding:** all income received by GamCare is managed in accordance with our documented strategic priorities, the evidence base for effective treatment and support, and the interests of those affected by, or at risk of, problem gambling. The terms of any funding received are documented in contracts/grant agreements which, in addition to conflict of interest provisions, must include specific stipulations to prevent any gambling industry influence over the design and delivery of GamCare's activities.
- **Donations:** GamCare receives donations from businesses (including the gambling industry) and individual members of the public. In line with Charity Commission guidance, we accept all donations in order to maximise our impact, unless to do so would cause damage to the charity in excess of the donation amount, for example regards reputational damage or loss of other income. All donations, both financial and in kind, are recorded within GamCare's accounts, including our published annual accounts. Any donations above 10% of overall income must be recorded in our Register of Interests to identify and limit any undue influence over decision-making.
- **Paid for services, including the Safer Gambling Standard:** GamCare provides accreditation against the Safer Gambling Standard to gambling industry operators. The Standard uses evidence-based criteria to assess the measures an operator has in place to protect people from gambling-related harm. To maintain the Standard's integrity, operator assessment is only ever provided as a contracted, paid-for service; donations (financial or in kind) are not accepted in lieu; and accreditation is granted only on the basis of evidenced assessment against set criteria.
- **Network Providers:** the funding that GamCare provides to our network partners carries the risk of undue influence over these organisations, particularly where there is a relationship imbalance in size and profile. To limit this risk, the terms of our arrangements with all subcontracted partners are set out in documented grant agreements.

9. Hospitality and Gifts

GamCare's work is reliant on external relationships which enable us to, for example, secure funding, deliver joint services and engage in learning and development. In the course of these interactions, our staff may be offered hospitality and, occasionally, gifts. The acceptance of these offers may create a conflict of interest and should only be considered if high standards of ethical behaviour can be maintained. Our approach to hospitality and gifts is set out in detail in our Anti-bribery and Corruption Policy and all staff must act as follows:

- **Hospitality:** consider what is reasonable before accepting any hospitality, including that offered by any individual or organisation associated with the gambling industry. A common-sense approach should be taken with hospitality accepted only where this is both appropriate to the event (such as meeting refreshments), and not provided to a level which may be perceived to influence judgement (for example, not excessively expensive or exclusive). Any hospitality received in excess of £25 must be recorded in the Register of Interests, using the actual amount, or a reasonable estimate if the value is unknown.
- **Gifts:** personal gifts should not be accepted, and gifts to the charity should only be accepted if they are judged to be not excessive (usually less than £25 in value), not made with the intention of securing influence (for example, a return favour), and appropriate (for example, small gifts around Christmas), or if to refuse would cause significant offence (for example, on religious or cultural grounds). Any gifts received must be disclosed to the Director of Finance and Resources, and any gifts with value over £25 must be recorded in the Register of Interests, using a reasonable estimate if the value is unknown.

10. Board Governance Systems

Together with the range of measures outlined above, GamCare's board takes overall responsibility for the identification and management of conflicts of interest, using the following systems:

- **Identification:** all conflicts of interest are recorded within the Register of Interests which incorporates Staff Conflicts of Interest, Donations, Hospitality, and Gifts. The Register is held by the Director of Finance and Resources and is updated regularly, including on the appointment of trustees and senior managers, and at each board meeting. All financial information (such as staff remuneration, donations, gifts) is recorded within our accounts.
- **Prevention:** The Register of Interests is checked in advance of board discussion and decision-making. Where a conflict of interest is identified relating to a trustee, senior manager, staff member or third party, decisions regarding action are made on the basis of identified risk and are recorded as appropriate, for example regarding exclusion of a conflicted individual from discussion and/or decision-making processes.
- **Recording:** all conflicts of interest are recorded within the Register of Interests. Discussion and decisions regarding conflicts of interest are recorded within meeting minutes, including board meetings. Relevant minutes must document: the nature of the conflict; those affected; any prior declarations; the discussion held, including whether anyone withdrew; what decision was taken and how this was made.

11. Breach

All GamCare staff are responsible for upholding the principles and practice set out in this policy. If any employee is aware of an unmanaged conflict of interest, they must notify their line manager, the Director of Finance and Resources, or the Chair of Trustees as appropriate. Any serious concerns, for example regards failure to act on known conflicts of interest, may be raised with the Whistleblowing Lead, as detailed in GamCare's Whistleblowing Policy.

If any employee breaches this policy, we will take disciplinary action in line with the procedures set out in GamCare's Employee Handbook and accompanying policies, and the employee may face dismissal on the grounds of gross misconduct.

12. Monitoring

12.1 There is a requirement as part of GamCare induction to ensure that staff are made aware of the importance of policies and procedures and their adherence to them. It is the line manager's responsibility, with the assistance from HR to monitor adherence to policy and procedures outlined.

13. Dissemination

13.1 HR will arrange for all ratified policies to be added to the relevant platform that GamCare staff can access and they will be notified of all relevant policy activity through GamCare internal and external communication systems.

14. Review of Policy

14.1 Policies are reviewed as standard either annually or on its two-year anniversary by the relevant directorate. The Policy may be reviewed in advance of its scheduled date if there are any significant internal or external changes that affect the policy area.

15. Approval

15.1 Policy approval is conducted via the Employee Forum and SMT Policy Group. Policy ratification is via the SMT and Board of Trustees as required in line with the GamCare Policy Review Schedule.