



UKRI Gambling Harms Research UK: Disclosure of Interests Policy

Date: 31.07.2026

Version: 1

Authors: Heather Wardle, Gerda Reith, John Holmes, Simon Dymond, Chris Bunn, Joanne Neale

Contents

The policy at a glance	3
Focus:.....	3
Key principles:	3
Support:	3
The guidance (abbreviated; see main document for definitions):	3
Roles and responsibilities:	4
Definitions	6
Definitions relating to products, industries and other agencies	6
Definitions relating to people, groups and disclosure types.....	7
The Policy: Introduction	10
Background to the Current Gambling Landscape	10
Policy Purpose, principles and obligations	11
The Guidance	14
Scope	16
The Process	17
Appendix A: DOI Committee membership	19
Appendix B: Declaration form	19

The policy at a glance

Below we summarise the key elements of the Disclosure of Interest policy. The policy is a live document and will be updated across the life-course of the Gambling Harms Research UK network. The policy applies to all members of the Gambling Harms Research UK network (that is any co-investigator, collaborator or project partner working within either the Evidence Centre or Innovation Partners).

Focus:

Whilst gambling research is subject to many potential sources of undue influence and bias, this policy primarily sets out guidance relating to engagement with commercial gambling entities.

Key principles:

These four principles underpin the design of our policy:

- **Transparency:** All Gambling Harms Research UK Network members and collaborators should provide full and complete transparency about all relevant sources of funding, data and other in-kind support they receive and any collaborations they participate in.
- **Respect:** Debates about declarations of interest involve professional judgements that consider the nature and extent of risks to research integrity, reputations and policy processes. Within the Gambling Harms Research UK network everyone should feel free to discuss, debate and resolve these differences in an atmosphere of mutual respect and trust.
- **Forward looking:** As we seek to improve our management of conflicts of interest over the duration of the network, we focus on our practices now and our practices going forward rather than what has occurred in the past.
- **Proactive:** Implementing this policy requires every network member to be proactive in thinking about, navigating and discussing potential conflicts of interest.

Support:

The Gambling Harms Research UK Evidence Centre will develop tools (i.e. online reports) and convene and manage a Disclosure of Interests (DOI) Committee to support the implementation of this policy.

The guidance (abbreviated; see main document for definitions):

1. Gambling Harms Research UK network members should not accept **funding** of any kind (direct or indirect) from the gambling or other health harming industries or their social aspect organisations (**industry social aspect organisations** include charities like GambleAware or International Center for Responsible Gaming).

2. Funding from the Gambling Commission, including regulatory settlement funds brokered by the Gambling Commission, is permissible but requires attention to the management of potential conflicts of interests.
3. Members should not **collaborate** with representatives of the gambling industry, other health harming industries, or organisations connected to those industries, including ISOAs or trade associations.
4. Members should not **collaborate** with researchers or other people/organisations who are currently funded by the gambling industry, other health harming industries or trade associations for these industries.
5. Members should be aware of the potential reputational risks to Gambling Harms Research UK associated with **collaborating** with researchers funded by **industry social aspect organisations** or those working in University departments or units directly funded by the gambling industry. Proposed collaborations should be discussed with the DOI committee.
6. Members should consult with the DOI Committee when considering any funding application, roles, collaborations, offer or other relationship where actual or perceived conflicts of interests may arise.
7. Members should consider carefully the risks and benefits associated with **interactions** with the gambling industry, other health harming industries, or organisations connected to those industries, including industry social aspect organisations or trade associations, or researchers who have received funding from these industries or organisations. Members should consult the DOI committee for advice (see full policy).
8. Members should give due consideration to potential conflicts of interest, their management and other risks when considering whether to accept funding from other relevant commercial actors (e.g. technology, financial or media organisations).
9. Members should consider any potential conflicts of interest, their management and other risks when accepting funding from **Civil Society Organisations** and Philanthropists.
10. Lived experience groups organised by the Gambling Harms Research UK network will not include representatives from organisations funded by industry.

Roles and responsibilities:

- **Network members:** adhere to policy throughout their work; proactively discuss DOI issues at the outset of new collaborations; discuss any issues and seek advice from DOI committee; Support Innovation Partnership Leadership by providing information proactively and on request.
- **Innovation Partnership Leadership:** promote awareness and adherence to policy; model best practice of DOI management; take lead responsibility for collation of information and reporting; proactively discuss matters arising with DOI Committee

- **DOI Committee:** Provided trusted support and advice to network members; develop tools and forms to support reporting; review annual returns and prepare external reports on DOI policy management.

Definitions

Before outlining the policy in full, we first define a range of terms, industries and actors used within this document. The definitions below aim to cover the key areas of our work and will be reviewed on an annual basis.

Definitions relating to products, industries and other agencies

Gambling

The staking or risking of money or something of material value on an event having an uncertain outcome in the hope of winning additional money and/or things of material value.

Industries

Ownership of companies producing gambling products, as well as ownership of intellectual property and other relationships, can change rapidly over time. With reference to the definitions below, this means that the Gambling Harms Research UK network should be alert to the possibility for change when forming judgements on potential COIs and that the appropriate response to a potential COI may also change over time.

Gambling Industry: Organisations and entities that design, manufacture, prepare for sale, supply data or insight to produce, distribute, market, promote or sell gambling products (including lotteries). This includes B-2-C (business to consumer) as well as B-2-B (business to business) companies.

Governmental actors and other agencies

Gambling Commission: The Gambling Commission is an executive, non-departmental public body of the UK Government responsible for regulating gambling and supervising gambling law in Great Britain. As a regulator, the Gambling Commission devises and enforces a wide range of gambling policies and must have a relationship with the industry it regulates for purposes of enforcement, compliance or consultation. The Gambling Commission frequently funds research into regulatory policy and has a statutory duty to produce National Statistics on the prevalence of gambling and gambling harms. The funding for the Statutory Levy is provided via the Gambling Commission. Elsewhere, the activities of the regulator are funded from mandatory licensing fees and the statutory basis for this funding means that we consider funding from the Gambling Commission outside our definition of funding from the gambling industry. However, researchers should be aware of the Commission's interactions with the industry they regulate.

Industry social aspect organisations (ISAOs): Organisations that are funded by industries involved in the production, supply and sale of gambling products that often have a stated purpose to reduce or mitigate harms from those products. This includes organisations operating at various degrees of independence from the related industry. A prominent example includes (the now defunct) GambleAware but remaining examples include the

International Center for Responsible Gaming and any other similar organisations that are primarily funded by voluntary agreements from the gambling industry.

Civil Society Organisations (CSOs): This includes a range of non-state, not-for-profit or voluntary entities formed by individuals or groups that are separate from the State and the market. CSOs represent a wide range of interests and ties, including those related to gambling and public health research and practice. They can include community-based organisations as well as non-governmental organisations (NGOs) some of which may have links with the related industry.

Philanthropists: Philanthropic organisations and individuals fund advocacy, research or research organisations in the gambling field. This activity may be benevolent and benefit society, but it can also benefit the donor (e.g. there may be tax benefits). It is also not always subject to the same conditions, scrutiny or evaluation as public research bodies. For example, grant giving may be influenced by the donor's preferences as well as their attitudes towards gambling and gambling harms, and may lack public involvement.

Trade associations: Organisations funded by industries to represent their shared commercial interests, usually through lobbying, public relations and other political activity. A prominent example is the Betting and Gaming Council.

Other relevant commercial actors: Other companies and industries that are not listed above but have a commercial interest relevant to Gambling Harms Research UK network. This includes, but is not limited to, social or market research companies, PR and legal firms, technology and data companies, financial services companies, companies developing interventions, university spin-out companies, and those involved in the implementation or delivery of interventions as well as other professional service industries.

Definitions relating to people, groups and disclosure types

Members of the Gambling Harms Research UK network: This includes any individual or organisation named within the Evidence Centre or Innovation Partnership grant proposals who will contribute towards the delivery of Evidence Centre or Innovation Partnership objectives. This includes all co-investigators, collaborators and project partners. It also included non-named team members appointed post award, including professional service staff. People and organisations are considered network members irrespective of whether they are directly funded by the Levy or are donating their time in kind.

Gambling Harms Research UK (GHR-UK) Evidence Centre: This includes Centre investigators, researchers funded by the Centre as core posts, students receiving funding from the Centre, and Centre project management and support staff.

Gambling Harms Research and Innovation Partnerships (GHRIPs): This includes Partnership investigators, researchers funded by the Partnerships as core posts, students receiving funding from the GHRIPs, and Partnership project management and support staff.

Gambling Public Involvement and Engagement (GamPI) Forum: This includes a group of people with lived and living experience of gambling and gambling harms. They draw on their experiences and knowledge to advise on all aspects of work by the Gambling Harms Research UK network.

Policy Forum: This includes policy and regulatory stakeholders who will engage with the work of the Gambling Harms Research UK network to help to co-develop knowledge exchange and academic activities and input into policy debate.

Civil Society Organisation Forum: This includes organisations focused on gambling harms and intersecting areas (e.g., poverty, suicide). They will engage with the work of the Gambling Harms Research UK network to help to identify evidence needs, foster multi-sectoral responses to gambling harms and build thought leadership.

Disclosures of Interest Committee (DOI Committee): A sub-committee drawn from the Gambling Harms Research UK network, chaired by the Evidence Centre responsible for overseeing and implementing the Disclosure of Interest Policy. The DOI Committee is accountable to the Evidence Centre's Executive Management Team (see Appendix A for DOI Committee membership).

Definitions of key concepts for declarations of interests

Collaboration: Any professional relationship which involves people jointly working together on a shared endeavour, project or output, irrespective of the funding or contractual arrangements underpinning that relationship.

Conflict of interest: A conflict of interest arises in circumstances where there is potential that professional judgment or actions regarding a primary interest (e.g. the work of the Gambling Harms Research UK network) will be unduly influenced, or may reasonably be perceived to be unduly influenced, by a secondary interest. A potential or actual conflict of interest that is not related directly to the work of the Gambling Harms Research UK work may also pose a reputational risk to the network or its members. Conflicts of interest can be of a financial or non-financial nature or both.

Declaration of interest: A written disclosure by researchers that identifies any potential source or risk of undue influence by external individuals or organisations. The disclosure should be written in a clear and transparent way that is open to assessment by others.

Funding: Any financial payment or benefit, both monetary or in-kind, received by the individual or by an organisation on behalf of the individual for the provision of any professional services. This includes, but is not limited to, funding for research, consultancy or advice, hospitality, and payment of honorariums, travel or accommodation costs, conference or event fees or other expenses. It also includes payments to third parties for provision of in-kind services (e.g. supply of data or materials).

Interaction: Interactions refer to attendance at meeting or events and active participation in work-related communications with others at in-person meetings or events, or through other forms of communication (email, phone, videocall etc).

Other risks: Risks arising from interactions with industry, trade associations, ISAOs, CSOs, philanthropists or other relevant commercial actors that are related to but distinct from conflicts of interest. These include individual or collective reputational risks, legitimisation or perpetuation of activity by industry that is detrimental to public health, and making decisions affecting ECRs in relation to conflicts of interest that may be detrimental to their future careers. Other risks also include actions taken by individuals or organisations outside the Gambling Harms Research UK network that may affect those within it, including employer and stakeholder relationships that may create perceived conflicts of interest.

The Policy: Introduction

This policy is produced by the Gambling Harms Research UK Evidence Centre to provide guidance for those working within the Gambling Harms Research UK Network, funded by Statutory Levy on gambling and delivered by UK Research and Innovation (UKRI).. The Gambling Harms Research UK network comprises the Evidence Centre and the nineteen Stage 1 Innovation Partnerships. It is intended to guide best practice to ensure the independence, integrity and reputation of the research produced by the network. We hope the principles set out here will be more widely adopted by others funded through UKRI's Research Programme in Gambling.

The Statutory Levy represents a fundamental shift in the way gambling research is funded in Great Britain. It is essential to the continued success and sustainability of the Levy, and the Gambling Harms Research UK network, that our research remains free from undue influence and is not perceived to be unduly influenced by external interests. Achieving this requires careful management of potential and perceived conflicts of interest, with strong commitment to supporting these principles exhibited by Centre and Innovation Partner leadership.

The following policy is based on the Disclosure of Interests (DOI) guidance developed by the Evidence Centre, in consultation with the Gambling Harms Research UK Network. It draws on key principles established by UKRI, by the Levy Prevention Commissioners (Office for Health Improvements and Disparities; Scottish Government, Public Health Scotland and Public Health Wales) as well as those implemented by the NIHR's Policy Research Unit in Addictions (PRU) ([PRU in Addictions DOI - May 2025 \(5\).pdf](#)). In developing this policy, we have drawn on our shared learning of working within the gambling research and policy field. The policy is also attendant to, and compliant with, UKRI's Conflict of Interest requirements for the programme duration ([Conflicts of interests – UKRI](#)) as well as their guidance on Declarations of Interests ([UKRI declaration of interests: policy and guidance – UKRI](#)).

Background to the Current Gambling Landscape

With the introduction of the statutory Gambling Levy by the UK Government in 2025, the landscape of funding for gambling research, treatment and prevention in Great Britain has changed dramatically. Here we provide a brief overview of the current situation and the situation that preceded it.

Statutory Gambling Levy

The statutory Gambling Levy was introduced in April 2025. It is a tax levied by the UK Government on the gambling industry (specifically licensed gambling operators) that is then hypothecated by the Government for research, prevention and treatment purposes. An independent Gambling Levy Board oversees distribution of funds for delivery of research, prevention and treatment to reduce gambling-related harms. UKRI administers the research

component and is wholly independent of the gambling industry. A specific aim of UKRI funding is to provide a non-conflicted source of funds for UK gambling research.

Historical arrangements and actors

Prior to 2025, some research funding was provided by a voluntary industry levy distributed by GambleAware, a charity funded mainly by the gambling industry. Gambling operators were also encouraged to fund academics and third sector organisations directly if they were eligible recipients on the Gambling Commission's Research Education and Treatment list. In addition, researchers and third sector organisations were eligible to apply to for Regulatory Settlement Funds. This funding was created via regulatory action taken by the Gambling Commission against gambling operators and allowed operators to make untied settlement payments to parties nominated by the Gambling Commission. The Gambling Commission's administration of this fund was suspended in 2024 and transferred to GambleAware. GambleAware ceased all operations in March 2026. The mechanism for future allocation of Regulatory Settlement Funds is unclear.

The legacy of these historic arrangements shapes the environment that many people in the gambling research and harm prevention ecosystem now operate within.

In the context of new UKRI funding streams, our DOI policy will aim to align UK gambling research with best practice models from related research fields by the end of the lifespan of the Evidence Centre. To achieve this, it is important to work with the Gambling Harms Research UK Network to embed best practice across all activities, particularly where new entrants to the field may be unfamiliar with the nuanced issues in gambling research.

Policy Purpose, principles and obligations

Gambling research is subject to many potential sources of undue influence and bias. Foremost among these are the powerful commercial entities that drive the use of gambling products, many of which have vested financial interests and motives. There is a large and growing body of evidence that documents the different ways these commercial entities seek to influence all stages of the research process to create biases in their favour. Additional sources of influence and bias may include governments and politicians, funders (including philanthropists), campaigning and advocacy organisations, and others wishing to advance certain agendas. Further, the environments in which researchers work include systems of promotion and career progression, research funding and career networks that may affect individuals' actions in problematic ways, particularly for early career researchers.

As independent researchers, we therefore need to be attuned to and manage all potential sources of influence and bias to ensure that there is trust and transparency in the integrity of the research we produce. This includes considering the potential impact of *actions and interactions* that may perpetuate and support systems that allow commercial and other influences to operate, and our own roles within these systems.

The aim of this Disclosure of Interests (DOI) policy is to identify, manage and reduce risks of undue influence by external individuals or organisations on our research and reputation. Our aim is also to support network members in the discharge of their *contractual obligations* to UKRI.

UKRI's policy on conflict of interest is that across all research areas, they do 'not permit engagement with industries whose core business can be associated with harm to public health or societal wellbeing in line with our ethical standards or harms-based exclusion principles'. This includes the gambling industry. UKRI note that exceptions may be made for time-limited, purpose-specific interactions deemed essential to achieving legitimate and high-quality research objectives. These exceptions must be discussed and agreed with UKRI prior to applications being submitted, to ensure transparency and that appropriate safeguards are in place to ensure research findings are not compromised. Failure to adhere to UKRI's conflict of interest policies is a term for contractual cancellation and thus ongoing adherence is a contractual obligation as well as best practice.

Because of this, we seek to ensure that researchers working within the Gambling Harms Research UK Network have clear policies, alongside access to information and guidance, to help them manage these risks when working in challenging research environments.

Specifically, in this policy we:

- Clarify the range of interests, collaborations and interactions covered;
- Explore different sources of undue influence and conflict of interests and how they may arise;
- Provide guidance to Gambling Harm Research UK members to help them identify potential risks, prevent and manage conflicts if they arise, and reduce the likelihood of risks or conflicts arising in future for themselves and others.

This policy aims to recognise the wide variety of circumstances and contexts that researchers working within the field of gambling and gambling harms face and acknowledges that we cannot anticipate all eventualities. This means its implementation will rely to a degree on professional judgements. We therefore want to build a supportive environment in which all members of Gambling Harms Research UK Network feel enabled and empowered to discuss with their colleagues any issues that arise in a proactive way that allows them to gain respected and practical advice. To facilitate this, we will establish a DOI committee where any issues arising can be discussed in a mutually supported way. Our practice and policy is founded on the following four main principles:

- **Transparency:** all network members and collaborators should provide full and complete transparency about all relevant sources of funding, data and other in-kind support they receive and any collaborations they participate in. These must be comprehensively and accurately declared at all stages of the research process, including development, execution, dissemination and utilisation. Declarations should be written so that they are clear and open to assessment. To support this, all network

members will provide up-to-date Declaration of Interest statements and update these annually and/or whenever circumstances change.

- **Respect:** Debates about declarations of interest necessarily involve professional judgements that consider the nature and extent of risks to research integrity, reputations and policy processes. They also involve individuals working in different research environments and facing different pressures. It is our belief that fair-minded people acting in the best interests of public health may therefore reasonably reach different conclusions on the correct course of action regarding a potential conflict of interest. Within the network, everyone should feel free to discuss, debate and resolve these differences in an atmosphere of mutual respect and trust.
- **Forward looking:** We recognise that, for a complex set of reasons, the gambling field is not where it wants to be in terms of management of conflicts of interest. Both UKRI and other organisations see the Levy as an important opportunity to offer a critical reset and allow the field to move forward, in a constructive way, towards greater alignment with similar cognate areas. In practical terms, this means looking at our practices now and our practices going forward rather than what has been in the past.
- **Proactive:** Implementing this policy is going to require every network member to be proactive in thinking about, navigating and discussing potential conflicts of interest. These are not something simply to be declared after the fact, but to be proactively considered at the outset of any new collaboration or interactions. This principle especially applies to the development of Stage 2 Innovation Partnership proposals.

The Guidance

UKRI state that, across all research areas, they do not permit engagement with industries whose core business can be associated with harm to public health or societal wellbeing in line with our ethical standards or harms-based exclusion principles except under limited, pre-agreed circumstances. This includes the gambling industry. In light of this, and the considerations outlined above, we advise that:

1. Gambling Harms Research UK network members should not accept **funding** of any kind (direct or indirect) originating from or administered by representatives of the gambling or other health harming industries or ISAOs which, in turn, are funded by or collaborate with those industries.
 - a. This includes prominent ISAOs, like the ICRG and other similar organisations.
 - b. In line with the current position of the Levy Commissioners for Prevention, funding from the National Lottery Community Fund and comparable society lottery funds is exempt from our policy on direct industry funding. As the Commissioners have indicated that this exception is an interim arrangement subject to review in 2028, we will keep our position under review and may revise it in response to future levy-wide guidance. Any such funding must nevertheless be fully declared.
2. Funding from the Gambling Commission, including regulatory settlement funds brokered by the Gambling Commission, is permissible but requires careful attention to and management of potential conflicts of interest given relationships between the Commission, as the industry regulator, and the gambling industry as the entities being regulated. This should be discussed with the DOI Committee.
3. Members should not **collaborate** with representatives of the gambling, or other health harming, industries or organisations connected to those industries, including ISAOs or trade associations.
4. Members should not **collaborate** with researchers or other people/organisations who are currently funded by the gambling, or other health harming, industries or trade associations.
5. Members should be aware of the potential reputational risks to Gambling Harms Research UK associated with **collaborating with researchers funded by ISAOs** or working in University departments or units directly funded by the gambling industry. We strongly recommend avoiding such collaborations. However, we recognise that pre-existing relationships and commitments may make this impractical in the short term. Any such collaborations should therefore be fully declared and discussed with the DOI Committee to enable appropriate risk assessment and management. This interim position applies during Stage 1 of the Innovation Partnerships programme and will be reviewed at the start of Stage 2, with the expectation that members will be advised not to enter into such collaborations.

6. Members should consult with the DOI Committee when considering any funding application, roles, collaborations or offer where actual or perceived COIs may arise. Members should also consider consulting the DOI Committee if these or other activities may present other risks (as defined above). Consultation is not necessary in relation to all risks, but members should do so if they are in doubt.
7. Members should consider carefully the risks and benefits associated with **interactions** with the gambling, or other health harming, industries, or organisations connected to those industries, including ISOAs or trade associations, or researchers who have received funding from these industries or organisations. Considerations should include, but are not limited to, the impact on the integrity of the Gambling Harms Research UK network, the individual or collective reputations of Gambling Harms Research UK members and their stakeholders, the legitimisation of activities undertaken by industry actors that are detrimental to public health, the opportunity for Gambling Harms Research UK members to influence the outcome of an interaction, whether alternative arrangements may reduce the potential for current and future COIs, and those considerations indicated under the definition of other risks. Generally, Gambling Harms Research UK members should only engage in interactions of this kind if the potential benefits substantially outweigh the risks or costs. Circumstances where interactions may be appropriate include:
 - a. The interaction is a necessary component of a research project or programme. For example, some projects may require researchers to interview industry actors (i.e. research *on* rather than *with* industry). Members of the Gambling Harms Research UK network may also need to attend events to monitor the activity of industry actors in an area related to their research.
 - b. The researcher can influence substantively the outcome of a policy process. This might include a roundtable discussion between stakeholders organised by a government department that includes industry, public health actors and a government minister.
 - c. Industry actors attend a conference that is not itself organised or sponsored by an industry organisation.
 - d. A funder requires industry representation on a project steering committee. This may arise particularly when carrying out commissioned research for a government body.
 - e. Exchanging information about existing research or responding to research queries.
 - f. A Gambling Harms Research UK event where the DOI Committee has agreed that it is acceptable for individuals from industry or ISOAs to attend.

8. In all instances, where there is any doubt about the nature and risk of the interaction, these should be discussed with the DOI Committee.
9. Members should give due consideration to potential conflicts of interest, their management and other risks when considering whether to accept funding from other relevant commercial actors (e.g technology, financial, media organisations).
10. Members should consider any potential conflicts of interest, their management and other risks when accepting funding from Civil Society Organisations and Philanthropists, particularly where the organisation or individual holds strong views on the subject under study. Considerations should also address whether the goals of the organisation conflict with the goals of Gambling Harms Research UK and therefore whether other risks arise.
11. Gambling Public Involvement (GamPI) Forum and lived experience groups organised by the Gambling Harms Research UK Network will not include representatives from organisations funded by industry. Where it is necessary to include some individuals with ISOA funding (for example to ensure diversity of representation), their number should be monitored and input balanced with those without such funding. Information on potential conflicts of interest (past or current) are collected when people sign up to the Gambling Harms Research UK GamPI Forum using the Expression of Interest Form.

Scope

The guidance and procedures set out in this policy apply to all Gambling Harms Research UK members and collaborators. We recognise that Gambling Harms Research UK members have multiple roles, but we expect members to adhere to these guidelines across all their working arrangements.

GamPI Forum members follow a separate process for Declaration of Interest.

Our aspirational aim is to move to a policy aligned with best practice with other cognate areas over the course of the Gambling Harms Research UK network.

The Process

The roles and responsibilities of all network members in this policy are outlined in Figure 1.

Figure 1: Roles and responsibilities for conflict management



All members of the Gambling Harms Research UK Network will be expected to adhere to this policy. Innovation Partnership leaders will be responsible for ensuring team members are aware of the policy, ensuring and monitoring adherence to it, and for annual reporting.

A DOI committee will be established as a forum to support all Gambling Harms Research UK members in discussion around potential conflicts of interest and their management. The Committee will be chaired by Prof Gerda Reith and include:

- at least one other member from the Gambling Harms Research Evidence Centre, and
- two members from the Innovation Partnership network.

The purpose of the DOI committee is to provide practical advice, support and guidance on any DOI matter arising for any member, as well as maintain transparency with regards to conflict management across the network. A dedicated email address for the Committee will be established through which members can contact the Committee. Depending on the level of advice sought, the query may be discussed and resolved via Chairs action, or if the query is more substantive, the Chair may recommend convening an *ad hoc* meeting to discuss the issue in fuller detail. The meeting will be considered quorate if at least two members of the Committee are present, along with the person with the query.

All Innovation Partners Principal Investigators/Co-leads will be responsible for completing an annual return which collate DOIs for their wider team. An early version of this form was completed in June 2026 (results from this are summarised in Appendix C). To facilitate this, the Evidence Centre will produce a standardised form that can be circulated to team members to support Innovation Partners in collating this information. This form can and should be used proactively by all network members to understand potential conflict of interests when developing new partnerships and collaborations across all professional endeavours.

The returns will be reviewed by two DOI committee members, categorising declarations as:

- a) no concern
- b) action required

Where reviewers disagree, the DOI Committee chair will ask them to discuss the disclosures. If no agreement can be reached, a third member of the DOI Committee will review the disclosure.

Potential actions include:

- Request further information from the Innovation Partner PI/leadership before completing review
- Request actions by the Innovation Partner PI/leadership. This may include but is not limited to: recommendations for members to discuss ways of mitigating conflicts of interest with colleagues outside the network and to report back to the DOI Committee; recommendations for processes and protocols to be implemented to minimise risk; the Gambling Harms Research UK member withdrawing from proposed collaborations/funding etc.
- Refer to Gambling Harms Research UK Evidence Centre Executive Management Team for discussion
- Raise concerns with UKRI

Appendix A: DOI Committee membership

DOI Committee membership comprises:

- Professor Gerda Reith (Chair)
- Additional member from the Executive Management Team (on rotating basis; one year term)
- Rotating membership from Gambling Harms Research UK Innovation Partners

Appendix B: Declaration form

The annual declaration form to be completed by each Innovation Partnership lead will be hosted online. The information below sets out what data the declaration form will collect.

- Name
- Email
- Innovation Partnership name
- Reporting period (starting from date of contract award)
- Whether have read and understood the Gambling Harms Research UK Declaration of Interests Policy? Where any points that are unclear, please contact the DOI Committee Chair. Y/N

The report will collect data in two parts – the first part refers to any named person within the project team. The means anyone specifically named within the team proposal as a team member or someone who has been recruited into a named position (i.e., research assistant; professional services staff). Because this will largely cover academic researchers, we will collect information about the past three years and the current reporting period.

The second part will collect information about named organisations within the project grant. This mainly refers to project partners or any named organisation which is receiving funding or has a core role in the delivery of the project. For these organisations we will collect information about the current reporting period only.

Part 1:

- Please enter the total number of named individuals working within your Innovation Partnership team. A named individual is any person specifically named within your proposal or a person appointed to fulfil a named post (i.e., a research assistant; professional services staff etc).
- Thinking about these named individuals, please enter the total number who have, a) in the past three years and b) within the current reporting period (x to x):

	Received funding in last three years	Receive funding in current reporting period
A. Gambling industry (excluding regulatory settlements and National Lottery)	Enter N of individual team members	Enter N of individual team members
B. Industry social aspect organisations (eg, GambleAware, ICRG etc)	Enter N of individual team members	Enter N of individual team members
C. Trade Associations	Enter N of individual team members	Enter N of individual team members
D. University departments or units directly funded by the gambling industry	Enter N of individual team members	Enter N of individual team members
E. Other relevant commercial actors and/or health harming industries	Enter N of individual team members	Enter N of individual team members

If any reported, a follow up will be asked to provide specific details. Please provide sufficient details to enable the DOI committee to understand the circumstances.

- Please enter the number of named people within your Innovation Partnership who have collaborated with any of the following a) in the last three years and b) currently

	Collaborated with in last three years	Currently collaborate with
F. Gambling industry (excluding Gambling Commission and National Lottery)	Enter N of individual team members	Enter N of individual team members
G. Industry social aspect organisations (eg, GambleAware, ICRG etc)	Enter N of individual team members	Enter N of individual team members
H. Trade Associations	Enter N of individual team members	Enter N of individual team members

I. University departments or units directly funded by the gambling industry	Enter N of individual team members	Enter N of individual team members
J. Other relevant commercial actors and/or health harming industries	Enter N of individual team members	Enter N of individual team members

- Please confirm that the individuals within your team have followed all guidance within this policy regarding interactions with the gambling industry. This includes consulting with DOI committee on appropriate interactions where advice was needed.

Y/N

- Please write a short overview of any interactions your team have had with the gambling industry in the reporting period. Please provide enough detail to allow the DOI committee to review and understand risk and mitigations.
- Does any other named individual within your team have any other circumstances not declared elsewhere in this form which have led, lead or have the potential to lead to an actual or perceived conflict of interest and/or any interactions or activities which could pose a reputational risk to the Gambling Harms Research UK Network (either to its research or the individuals involved) that you wish to disclose or request advice on? Y/N and Free text

Part 2:

- How many different third-sector, civil society or governmental organisations are named on your grant?
- Thinking about these organisations, please enter the total number who have received funding from each of the following in the reporting period:

	Receive funding in current reporting period
K. Gambling industry (excluding regulatory settlements and National Lottery)	Enter N of organisations
L. Industry social aspect organisations (eg, GambleAware, ICRG etc)	Enter N of organisations
M. Trade Associations	Enter N of organisations
N. University departments or units directly funded by the gambling industry	Enter N of organisations
O. Other relevant commercial actors and/ or health harming industries	Enter N of organisations

If any reported, a follow up will be asked to provide specific details. Please provide sufficient details to enable the DOI committee to understand the circumstances.

- Please enter the organisations who have collaborated with any of the following in the reporting period:

	Currently collaborate with:
P. Gambling industry (excluding regulatory settlements and National Lottery)	Enter N of organisations
Q. Industry social aspect organisations (eg, GambleAware, ICRG etc)	Enter N of organisations
R. Trade Associations	Enter N of organisations
S. University departments or units directly funded by the gambling industry	Enter N of organisations
T. Other relevant commercial actors and/ or health harming industries	Enter N of organisations

- Please confirm that organisations within your team have followed all guidance within this policy regarding interactions with the gambling industry. This includes consulting with DOI committee on appropriate interactions where advice was needed. Y/N
- Please write a short overview of any interactions that organisations within your team have had with the gambling industry in the reporting period. Please provide enough detail to allow the DOI committee to review and understand risk and mitigations.
- Does any organisations within your team have any other circumstances not declared elsewhere in this form which have led, lead or have the potential to lead to an actual or perceived conflict of interest and/or any interactions or activities which could pose a reputational risk to the Gambling Harms Research UK network (either to its research or the individuals involved) that you wish to disclose or request advice on? Y/N and Free text
- By completing and signing this form:
 - I agree to undertake to be vigilant of these issues raised in this policy document and to follow the guidance provided which describes how to identify potential risks and conflicts.
 - I understand that I can request support and advice from the DOI Committee at any time prior to any interactions which may have the potential to fall under this policy and should do so in advance of any such interactions where reasonably practicable'.
 - I consent to the disclosure of any relevant conflicts to other Gambling Harms Research members and in the resulting report or work outputs as necessary.
 - I agree to promptly notify the Gambling Harms Research UK Evidence Centre Programme Manager either verbally or in writing of any new circumstances arising which fall under the scope of this policy AND complete a new declaration of interest form that describes the changes. This includes any change that occurs throughout the time I am affiliated in any way with the Gambling Harms Research UK network and its activities.
- DECLARATION. I hereby declare that the disclosed information is true and complete to the best of my knowledge.
- Date:
- Signature: _____

Appendix C: Overview of initial DOI responses to Part 1, collected at Stage 1 inception

At the network's inception, the Gambling Harms Research UK Evidence Centre conducted a survey of Innovation Partnerships to gather baseline information on their alignment with the key principles set out in this policy. 17 out of 19 Innovation Partners provided information.

The responding Innovation Partnerships reported that there were 121 named individuals within their teams. Their declarations were as follows:

In the past 3 years:	Number of individuals reporting each	%
<i>Received funding from:</i>		
Gambling industry (excluding Gambling Commission and National Lottery)	1	0.8%
Industry social aspect organisations (eg, GambleAware, ICRG etc)	11	9%
Trade Associations	0	0%
University departments or units directly funded by the gambling industry	5*	4.2%
Other relevant commercial actors and/ or health harming industries	0	0%
<i>Collaborated with:</i>		
Gambling industry (excluding Gambling Commission and National Lottery)	0	
Industry social aspect organisations (eg, GambleAware, ICRG etc)	8	6.6%
Trade Associations	1	0.8%
University departments or units directly funded by the gambling industry	0	
Other relevant commercial actors and/ or health harming industries	0	

*This includes two researchers who included being funded by the GambleAware Bristol Hub for Gambling Harms.