



National Problem Gambling Helpline: Call or Text 1-800-GAMBLER or visit 1800gamblerchat.org

Conflict of Interest Policy for NCPG Volunteers

Updated November 2024

Definition and Applicability

A conflict of interest may arise in any circumstance that may compromise the ability of a person to make unbiased and impartial decisions or actions, or to influence such decisions or actions, on behalf of NCPG. Such circumstances may involve family relationships, business transactions, employment or contractor relationships, consulting, professional activities, political activities, or personal affiliations.

NCPG staff and volunteers who serve on the Board of Directors, Board committees, and staff committees have a primary obligation to the interests of NCPG. Personal interests, or the interests of third parties, should not affect any actions taken during the course of their duties and responsibilities. To facilitate understanding and compliance with this obligation, the Executive Committee of NCPG shall have oversight of the completed forms provided by staff members and volunteers serving on the Board and all committees.

Disclosure

NCPG requires staff and volunteers who serve on the Board, Board committees, and staff committees to:

- Immediately disclose the existence of an actual, potential, perceived or apparent conflict that has the potential to impact a matter for action or decision; and
- Submit an annual Disclosure Statement detailing any facts or circumstances that might constitute an actual, potential, perceived or apparent conflict of interest; and
- Submit an amended Disclosure Statement to reflect any material changes or additions to the submitted information that may arise during the course of the year.

Handling Conflicts

In any settings in which an actual, potential, perceived, or apparent conflict of interest may exist, the individual disclosing the potential conflict must refrain from any deliberations, debate, actions, or vote on the issue while a review is pending. However, the disclosing individual may be permitted to answer clarifying questions or to provide information that may be beneficial or critical to the discussion. Any item, experience, or other tangible thing provided to an individual due to their affiliation with NCPG, whether or not a conflict is perceived by the recipient, shall follow the Gift Policy disclosure process further outlined below.

The fact that a conflict (whether actual, potential, perceived or apparent) has been disclosed in a Disclosure Statement will be made a matter of record in the minutes of the meeting in which the conflict exists, which shall also note that the individual with a conflict abstained from the action or vote, and was not present for any discussion, as applicable.

Review Process

Reviewers of the Disclosure Statements are as follows:

- Disclosure Statements by Board committee members are reviewed by the Board Committee chair
- Disclosure Statements by Staff committee members are reviewed by the Staff Committee chair
- Disclosure Statement by Board Members are reviewed by the Executive Committee
- Disclosure Statements by staff members are reviewed by the Executive Director
- Disclosure Statements by the Executive Director are reviewed by the Executive Committee

Note: Verbal disclosures made during meetings of the Board, Staff or Committees, must subsequently be disclosed officially in a written Disclosure Statement or amended Disclosure Statement.

The designated reviewer(s) will review each Disclosure Statement for any facts or circumstances that may reflect an actual, potential, perceived, or apparent conflict of interest. The reviewer(s) may request additional information from the individual at any time. The reviewer(s) may also request the assistance of other Board members, other staff, legal counsel, or others to identify potential conflicts.

When evaluating facts or circumstances that have been disclosed, the reviewer(s) shall consider the following non-exhaustive list of factors that may indicate a conflict of interest: Solicitation or acceptance of personal gifts or other items of value in violation of the NCPG Gift Policy.

Any incident of abuse or misuse of a leadership position for personal or third-party gain or benefit.

- Situations in which an individual may be divided between personal interests or the interests of another organization and the best interests of NCPG.
- Business, professional or other activities that would materially and adversely affect NCPG either directly or indirectly.
- Any arrangement in which the individual provides goods or services to NCPG as a paid vendor.

Resolving Conflicts of Interest

If the reviewer(s) identifies an actual, potential, perceived or apparent conflict of interest, they may take one of the following actions to resolve such conflict:

- Waive the conflict of interest as unlikely to affect the individual’s ability to act in the best interests of NCPG. If a conflict is waived, the basis for such a decision should be memorialized in writing.
- Determine that the individual should be recused from all deliberation and decision making related to the particular transaction or relationship that gives rise to the conflict of interest.
- Determine that the individual must either eliminate the conflict or resign from service to NCPG. This course of action should apply when the conflict of interest is so pervasive that the individual would likely seldom, if ever, be able to act solely in the best interests of NCPG.

The NCPG Board of Directors reserves final authority over the resolution of all conflicts of interest relating to NCPG.

Board Honorariums

Members of the NCPG Board of Directors who are offered an honorarium as representatives of NCPG are to report the details to the Executive Committee and the funds shall be issued to NCPG.

Staff Honorariums

NCPG staff offered honorariums as representatives of NCPG are to report the details to their supervisor and the funds shall be issued to NCPG.

Gift Policy

Individuals shall not accept gifts from individuals or organizations that are in a position to benefit financially, directly or indirectly, from NCPG or from donors and agencies - other than incidental gifts, customary hospitality, and other benefits of nominal value, without first reporting and obtaining approval from the appropriate entity. For purposes of this policy, “nominal” shall mean less than \$200 per single gift. The report must include details of the gift, its value, the identity of the donor and any relevant circumstances surrounding the gift. The disclosure must be made no later than thirty (30) days prior to a gift planned to be accepted on a future date (such as tickets to an event) in order to allow sufficient time for review and approval. If the gift requires travel and/or is of more than nominal value, the disclosing recipient must be able to show that acceptance of the opportunity supports the furtherance of NCPG’s strategic plan and goals.

Gift Report Review Process

Reviewers of a gift report are as follows:

- Gift reports by Board committee members are reviewed by the Board Committee chair
- Gift reports by Staff committee members are reviewed by the Staff Committee chair
- Gift reports by Board Members are reviewed by the Executive Committee
- Gift reports by staff members are reviewed by the Executive Director
- Gift reports by the Executive Director are reviewed by the Executive Committee