

Research Commissioning and Governance Procedure

Introduction

1. The National Responsible Gambling Strategy sets the direction for research, education and treatment in Great Britain. This document sets out the research and governance procedures associated with delivering the research components of that Strategy. The procedures involve three main partners:¹
 - The **Gambling Commission**² is the industry regulator with responsibility for ensuring that gambling in Great Britain is conducted fairly and safely. From April 2019, the Gambling Commission will take lead responsibility for the National Responsible Gambling Strategy. As a result, it will also take responsibility for the Research Programme underpinning the Strategy.³ The Gambling Commission also writes the Research Briefs required to commission each project or theme contained within the Research Programme.
 - The **Responsible Gambling Strategy Board (RGSB)**⁴ is the Gambling Commission's expert advisory board. It is responsible for advising on the contents of the Research Programme underpinning the National Strategy, and for advising on the development of Project Briefs.
 - **GambleAware**⁵ is an independent charity which receives industry contributions and uses them to commission research. It does this in line with the priorities set out in the Research Programme. GambleAware has delegated responsibility for oversight of its research commissioning responsibilities to its Research Committee (a sub-group of its Trustees). No-one with a background in the gambling industry is or can be a member of GambleAware's Research Committee or Board of Trustees.

Background and context

2. The system for funding gambling-related research, education and treatment (RET) is set by government. Because GambleAware's funding relies on voluntary donations from industry, this procedure has been put in place to ensure that the research agenda, and specific questions to be answered by that research, are not set, or in any way influenced, by the gambling industry.
3. There is a provision in the Gambling Act 2015 which would allow for the replacement of voluntary contributions by a statutory levy. Parliament opted to make this a reserved power, which successive governments have yet to decide to implement.

¹ A [Statement of Intent](#) sets out how these three partners should work together. The approach set out in this procedure explains in more detail how this work in practice in relation to research commissioning and governance.

² [Gambling Commission website](#) – including information on composition of Board of Commissioners

³ [Research Programme 2017-19](#), Responsible Gambling Strategy Board, May 2017. NB: The current version of the Research Programme was published by RGSB

⁴ [Responsible Gambling Strategy Board website](#) – including information on Board Members

⁵ [GambleAware website](#) – information on trustees and management

4. Contributing to RET is part of the licensing conditions placed on operators by the Gambling Commission. There is no mandatory specification about how this is done, although the Gambling Commission recommends that a contribution to GambleAware ensures that operators are compliant with their responsibility.
5. The continued voluntary nature of the funding has created a perception in some parts of the research community that it enables the gambling industry to influence the research programme. We are confident that this perception is completely unjustified. The research commissioning and governance process described in this document is designed to ensure there is a clear separation between the setting of research priorities and questions, the commissioning and publication of research and the source of funding which pays for this research.
6. There should therefore be no grounds on which to question the integrity of research commissioned by GambleAware's Research Committee, or to doubt its independence from any improper influence from the gambling industry or anybody else. We are, however, open to suggestions about how the process could be improved to make the integrity of the process even clearer, within the current statutory framework.
7. Gambling-related research will be strongest if it is commissioned from a diverse range of sources. The primary focus of this document is the commissioning and governance arrangements for research funded by GambleAware. We recognise, however, the need to build on and expand the options for funding this important field of research.
8. The Gambling Commission has committed in its business plan 2018/19⁶ to defining the options for developing sustainable and trusted arrangements for RET, including diversifying funding routes and the potential role of research centres or hubs. A successful approach will support a diverse community of researchers pursuing their own research agendas and ideas. It is unrealistic to expect that the current system can deliver everything that is needed.
9. In this context, we welcome the openness of the Economic and Social Research Council, the Wellcome Trust and the National Institute for Health Research to bids for gambling research. We hope that the National Responsible Gambling Strategy and the Research Programme are useful in demonstrating areas of need and likely policy impact. All three partners are open to collaborative working with any researchers wishing to explore other funding routes.

Scope and structure of this document

10. The objective of the Research Programme is to pursue the objectives of the National Responsible Gambling Strategy. This research will be 'directive', in the sense that it will be commissioned according to a project brief setting out the research questions and required outputs. This document covers research commissioned via this route.
11. As an independent charity, when resources allow, GambleAware may also commission research outside of the Research Programme to pursue its own charitable objectives, subject to its own governance procedures. This research is not subject to the procedure set out in the document. GambleAware commissions it either via a call for tenders, or by responding to ideas put to it by researchers or research groups. Such 'responsive' research might relate to emerging issues or otherwise contribute in useful ways to the body of knowledge about gambling behaviour or its effects.
12. The structure of this document is as follows:

⁶ [Gambling Commission Business Plan 2018/19](#)

- **Part A** sets out the objectives of this procedure and the key principles on which it is based.
- **Part B** explains the responsibilities for commissioning and governance of the Research Programme.
- **Part C** outlines responsibilities for application and dissemination of research.

Part A – Objectives, key principles and dissemination

Objectives

13. The objectives of this procedure are to ensure that:
 - i. Research commissioning is conducted transparently and to the highest standards of governance so that all stakeholders can have confidence in the integrity of the results and a wide range of academics and research organisations are encouraged to engage with the delivery of the research agenda.
 - ii. Research priorities are clearly identified and addressed.
 - iii. There is clarity of responsibility and accountability.

Key principles

14. The key principles underpinning the approach to research commissioning and governance are that:
 - i. Research priorities should be transparent, published, subject to consultation with all interested parties and updated to reflect emerging needs. The framework for this is a published Research Programme, intended to provide insight and evidence that enhances understanding and contributes to effective policy making.
 - ii. Commissioned research projects should always have a clear, publicly available project brief, which sets out the question or questions to be addressed and the policy issues to which the questions are relevant.
 - iii. The process for commissioning projects and criteria and process used to assess responses should be publicly available.
 - iv. The budget made available for research should be allocated as cost-effectively as possible.
 - v. Relevant industry data should be widely available to researchers.
 - vi. The arrangements need to remain robust in ensuring integrity and independence. But they should not become unnecessarily bureaucratic and should retain sufficient agility to respond swiftly to requests for research on emerging policy issues.
 - vii. There should be a clear and transparent process for identifying and managing any conflicts of interest.
15. The legal and financial accountability for GambleAware's research commissioning rests with its Research Committee.

Part B – Commissioning and governance responsibilities

16. Directive research is commissioned in response to a specific project brief to fulfil some part of the Research Programme. The brief sets out the aims and objectives of the research project. The governance arrangements set out below ensure that there is no industry influence on setting the research agenda or specific research questions within project briefs.
17. The **Gambling Commission** has responsibility for:
- The National Responsible Gambling Strategy, which determines the overall direction for research requirements, and the Research Programme, which sets out these requirements in more detail.
 - Writing the research project briefs, drawing on RGSB's advice, which outline the policy context and need for the research, set the research questions to be addressed, explain how they fit with strategic priorities and describe how the research will be used. GambleAware's Research Committee will be consulted during the preparation of these briefs to help ensure the research plans are realistic and achievable.
 - Engaging with stakeholders, including consumers and the public, during the preparation and update of the Research Programme.
 - Ensuring access to data from surveys and industry.
 - Facilitating co-operation with industry when needed to carry out research – e.g. access to consumers or live testing of different approaches to safer gambling.
 - Working with DCMS and other stakeholders to anticipate research needs and ensure that any emerging need for research evidence is conveyed quickly and clearly.
 - Ensuring that key policy objectives are clear.
18. The **RGSB** has responsibility for:
- Advising the Gambling Commission on the content and prioritisation of the Research Programme necessary to underpin the National Responsible Gambling Strategy.
 - Helping promote the Research Programme and building confidence that it has been set independently of industry.
 - Advising the Gambling Commission on the development of individual Research Project Briefs for each significant project within the Research Programme.
 - Ensuring any conflicts of interest affecting its own members are identified and appropriately managed.⁷

⁷ [RGSB conflicts of interest policy.](#)

19. **GambleAware** has responsibility for:

- Developing, maintaining and delivering a Commissioning Plan for the Research Programme – taking account of available resources and timing constraints. The Commissioning Plan is the responsibility of GambleAware but is developed in consultation with the Gambling Commission and RGSB. Its implementation is dependent on the Gambling Commission and RGSB providing briefs and contributing to the review of bids and research outputs.
- Following a commissioning policy in line with best practice, ensuring commissioning processes are transparent to the public and make use of competitive processes appropriate to the size and nature of the project. The commissioning process, and where applicable the Invitations to Tender (ITTs), for each project or theme of research is published alongside the research brief.
- Evaluating bids and the issuing of contracts to the successful bidder. The scoring criteria and methods used to evaluate bids are publicly available. Contractual documents will always be clear about the ownership of intellectual property and access by other parties to data collected during research projects. Unsuccessful bidders are provided with constructive feedback.
- Consulting the Gambling Commission and RGSB (and additional experts where required) to ensure that all parties agree that what is being commissioned adequately reflects the aims expressed in the research brief. This will include reviewing bids, providing input to commissioning decisions and participating in steering groups for specific projects.
- Ensuring the quality of commissioned research, including through the establishment of appropriate steering groups of qualified individuals. The need for steering groups will be determined on a case-by-case basis, depending on the project's strategic importance, complexity, size, interdependencies with other pieces of research, and on the need to manage potential or perceived conflicts of interest. Steering groups include representation from the Gambling Commission and/or RGSB.
- Ensuring a process of robust peer review in line with best academic standards. GambleAware simultaneously shares pre-publication drafts of research reports with the Gambling Commission and RGSB for the purposes of quality assurance, ensuring that the research has addressed the identified policy need, and to inform their thinking at the earliest opportunity. When directive research is published, it will clearly state that it is research commissioned to progress the National Responsible Gambling Strategy.
- Publishing research in a timely way once peer review comments have been addressed. The sign-off process for publication is concerned with the quality assurance of research. The research findings are not subject to sign-off. GambleAware will only intervene to prevent publication of research if it has concerns about quality or contractual issues. Research will not be delayed for political or commercial reasons.

20. The GambleAware Board has delegated these responsibilities to its **Research Committee**. The Committee provides a forum to ensure a collaborative approach to delivering the Research Programme. GambleAware's Research Committee also ensures that all parties are updated on progress and understand any risks to successful delivery of the Research Programme.

21. The Research Committee has responsibility for recommending to the GambleAware Board of Trustees the required budget to fund the activities described in the Research Programme, taking into account the funds available to the charity. GambleAware's annual budget for

research will be set by its Trustees in consultation with its Research Committee, the Gambling Commission and RGSB.

22. In commissioning work in support of GambleAware's own strategic and charitable objectives, the Committee will be guided by, but not limited to, the priorities set out in the Research Programme.

Part C - Application and dissemination of research

23. For research commissioned from the Research Programme in support of the National Responsible Gambling Strategy:
 - The Gambling Commission is responsible for applying findings to policy, advising government and communicating the implications of the research to stakeholders and the wider public.
 - RGSB is responsible for using research findings to provide advice to the Gambling Commission.
 - GambleAware is responsible for disseminating the findings of research.
24. The approach to communication and dissemination of research findings will be agreed between the Gambling Commission and GambleAware.

Supported by:

**GAMBLING
COMMISSION**

RGSB Responsible Gambling
Strategy Board
RESEARCH ■ EDUCATION ■ TREATMENT

GambleAware