

Thames hospice

Policy: SOCIAL RESPONSIBILITY IN GAMBLING

Date	Author/Reviewer	Approved by	Doc name	Comment	Responsible Committee	Next Review
October 2023	Company Secretary	Income Generation Committee	FR-P-0001	<u>October 2023</u> Policy reviewed. Job titles updated.	Income Generation	August 2024
August 2023	Head of Individual Giving and Lottery			<u>August 2023</u> Policy reviewed.		
August 2022	Head of Individual Giving and Lottery Director of Fundraising and Marketing			<u>August 2022</u> Policy reviewed. This policy now refers to Prize-Led Fundraising and covers the Thames Hospice Lottery and Raffle, and potentially other prize-led fundraising. Appendix 1 has been reviewed and significantly updated. <u>Dec 2021</u> Policy reviewed <u>Dec 2020</u> Policy Reviewed. <u>Nov 2019</u> Minor changes to text and layout. Change to s2 - Responsibilities. <u>Nov 2018</u> Policy reviewed. Minor changes to text and layout. Minimum age of players increased to 18 years old. Maximum number of weekly entries reduced to £10 per person. <u>Updated:</u> July and September 2016, Jan 2017: Policy reviewed. Minor updates to text. <u>Dec 2015:</u> Minor changes to layout. Updated S6.2 and updates to responsible individuals (job titles). <u>New:</u> July 2014		

Policy Summary

This document sets out policies and our approach to ensuring we operate any gambling activities in a socially responsible way. Thames Hospice Lottery staff are familiar with this document and read it upon appointment and at least annually thereafter.

1 Purpose of Policy

- 1.1 Thames Hospice operates a Society Lottery for the general public in the Thames Valley and the surrounding area, for the sole purpose of raising funds for Thames Hospice.
- 1.2 The Hospice is committed to ensuring that the lottery is operated in a secure, fair and socially responsible way and to endorse responsible gambling amongst its members.

2 Responsibilities

- 2.1 The Director of Fundraising has overall responsibility to ensure that the policy is fit for purpose and disseminated throughout the organisation.
- 2.2 The nominated Executive Director is responsible for this policy if the Director of Fundraising is not available.
- 2.3 Daily management of the lottery and any raffles is the responsibility of the Thames Hospice Lottery Manager

3 Policy Statement

- 3.1 The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on three licensing objectives:
 - Preventing gambling from being a source of crime and disorder, being associated with crime and disorder, or being used to support crime.
 - Ensuring that gambling is conducted in a fair and open way.
 - Protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 3.2 This document sets our approach to ensuring we operate any gambling activities in a socially responsible way. Thames Hospice Lottery staff are familiar with this document and read it upon appointment and at least every six months thereafter.
- 3.3 All Fundraising staff are annually briefed on the three licensing objectives of the Gambling Commission Objectives. This will extend to our contracted lottery provider staff.
- 3.4 For the purposes of this policy, the term lottery covers both raffle and lottery, unless stated otherwise.

4 Policy Detail

4.1 See Appendix 1.

5 Compliance

5.1 This policy and procedure will be reviewed annually by the Head of Individual Giving.

5.2 The policy will be annually reviewed and signed off by the Director of Fundraising and updated in relation to changes in legislation and best practice.

6 Breach of Policy

6.1 Any deviation in practice from the above policy and procedure will be deemed a breach of policy.

6.2 Any breach of this policy by Thames Hospice employees may lead to formal disciplinary action.

6.3 Any breach of this policy by Thames Hospice volunteers may lead to formal action under the Problem Solving Policy and Procedure.

7 References

7.1 The Gambling Act 2005.

APPENDIX 1 – SOCIAL RESPONSIBILITY IN GAMBLING POLICY

Background

Thames Hospice operates a Society Lottery for the general public in East Berkshire and South Buckinghamshire and the surrounding area, for the sole purpose of raising funds for Thames Hospice.

The Hospice is committed to ensuring that the lottery is operated in a secure, fair and socially responsible way and to endorse responsible gambling amongst its members.

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on three licensing objectives:

1. Preventing gambling from being a source of crime and disorder, being associated with crime and disorder, or being used to support crime.
2. Ensuring that gambling is conducted in a fair and open way.
3. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

1. Preventing gambling from being a source of crime and disorder

When an individual joins the lottery we will ensure that:

- The individual is aged 18 or over. We will ask the supporter to confirm this at sign up.
- The individual is resident in Great Britain.
- We do not suspect money laundering in any way, in line with the Proceeds of Crime Act.
- We also retain the right to cancel any membership should we suspect criminal activity.
- We do not accept cash.
- We limit the maximum number of entries into the lottery to £10 per person per week.
- We will record any incidents for future reference.
- Thames Hospice require all staff and canvasser, employed either directly or through an agency to have had the appropriate background checks.
- As part of the staff recruitment processes at our canvassing agency(ies) a minimum of two references are required. Legally during interview, every candidate must declare any criminal convictions spent or unspent.
- All Fundraising staff are annually briefed on the three licensing objectives of the Gambling Commission Objectives. This will extend to our contracted lottery provider staff.

- We will only use a random number generator (RNG) which has been provided by an External Lottery Manager registered with the Gambling Commission.

Raffle

- In relation to our raffle we have a limit of 100 tickets per individual and record all tickets that are sent out and returned.
- For the raffle or additional Super Draw Entries we will not send in excess of 60 tickets to an individual without customer interaction.

2. Ensuring that gambling is conducted in a fair and open way.

Our External Lottery Manager keeps a record of all tickets that have been distributed.

Extra tickets will not be made available to players until all monies have been received for existing tickets within that draw.

Our External Lottery Manager operates from secure premises, with fire safes in situ, and with contractors such as G4S.

Our External Lottery Manager processes all entries and handles all monies received for a lottery, although all monies are paid directly in to Thames Hospice's bank account, and banking reports are issued by our External Lottery Manager on a weekly basis.

Thames Hospice Staff involved in promoting lotteries/ raffles or selling lottery/ raffle tickets face to face or via telephone will be trained to a satisfactory standard to ensure compliance with Thames Hospice gambling policy and procedure.

Thames Hospice will not enrol any person into any of its lottery schemes if that person is suspected of any potential or actual criminal activities.

We will ensure that:

- Players have access to clear information on matters such as the rules of the lottery or raffle, the prizes that are available and how winners are selected.
- The rules are fair.
- Any advertising and promotional material is clear and not misleading.
- The results are made public.
- All lottery or raffle draws are conducted using a Random Number Generator, all raffle draws are conducted using a blind draw in sight of witnesses.

- A complaints procedure is in place including an independent arbitration service.
- Terms and conditions of the lottery are published on the website and promotional materials. Rules for raffles are printed on tickets and provided on the website.
- Thames Hospice staff who work directly on the lottery or raffle and the staff of our lottery supplier are not eligible to enter the lottery.

Raffle

- All draws are conducted at the External Lottery Manager's premises in plain sight of staff and ourselves.
- Draws are conducted at random using either a random number generator or using a blind draw.
- Speed prize draws (e.g. super seller and fast replies) will be drawn before any 'main' prize draw takes place. All speed prize draw entries will then be added to the 'main' prize draw.
- Thames Hospice will not accept liability for any incomplete, damaged, illegible entries. In such cases monies associated with tickets will be treated as donations to Thames Hospice.
- Any ticket payments received after the closing date of the draw will be considered as donations to Thames Hospice and treated as such.
- Winning numbers associated with the raffle will be published on the Thames Hospice website. Winning numbers shall also be available by contacting Thames Hospice's Supporter Care Team.
- Rules are published on the Thames Hospice website and on the reverse of raffle tickets.
- Printed versions of rules are available on request.
- Thames Hospice have a complaints procedure in place (please see below).
- A record is kept of both online and ticketed sales, as well as tickets not purchased but distributed regardless of whether they are returned or not.
- Thames Hospice will reserve the right to offer alternative prizes of equal value if, due to circumstances beyond its reasonable control, the stated prizes are no longer available.

3. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

We will use our best endeavours to address the following issues:

- Under age gambling. It is illegal for individuals under the age of 16 to enter into gambling. The

current minimum age for participating in the Thames Hospice prize-led fundraising is 18. We reserve the right to ask for proof of age from any customer and customer accounts may be suspended until satisfactory proof of age is provided. If, for whatever reason, upon winning the Thames Hospice Lottery any individual is unable to prove that they are 18 or over then any winnings will be forfeited and their stake returned.

- Gambling limits. Thames Hospice may impose limits on the value of lottery entries that can be purchased by an individual. The current limit to the maximum number of entries is £10.00 per person per week.
- Self-Exclusion. On request, we will close any player's lottery membership(s) for a minimum period of six months during which time the membership(s) cannot be reinstated. During this period we will also make all reasonable efforts to ensure that the individual does not try to open a new membership.
- All attempted breaches of underage gambling and self-exclusions will be recorded and investigated.
- Access to Player History. We will provide any player with a full history of their lottery membership, including complete payment and winnings history upon request.
- Provide Information on Gambling Support Organisations. We will provide contact details or links on any lottery websites or via other appropriate media to Gamble Aware and other relevant / appropriate organisations. We also provide financial support to the Responsible Gambling Trust¹, which raises funds to support research, education and treatment of problem gambling.
- Self Help and Awareness Information. We will provide self-help and awareness information on any lottery websites or other appropriate media together with links to or contact details of Gamble Aware and other relevant / appropriate organisations.
- Staff Training. All relevant Thames Hospice staff receive awareness training on problem gambling issues, including affordability and awareness of vulnerability at induction and on an annual basis.

¹ Through the Hospice Lottery Association.