THAMES HOSPICE MARKETING GAMING AND GAMBLING POLICY

This policy sets out the requirements for the responsible, transparent and compliant marketing and promotion of all regulated Thames Hospice gaming and gambling products.

Thames Hospice is committed to operating all regulated gaming and gambling activities, including its lottery, raffles and related products, in a socially responsible and transparent manner.

This policy aligns compliance with the Advertising Standards Authority (ASA) and Broadcast Committee of Advertising Practice (BCAP) codes, alongside the Gambling Commission's Licence Conditions and Codes of Practice (LCCP) and its fundamental principles which promote:

- Preventing gambling from being a source of crime or disorder, being associated with crime or 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

Whilst also maintaining public trust in Thames Hospice's charitable work.



Please ask your Line Manager in the first instance for advice and guidance on any aspect of this policy.

If you'd like impartial advice and support, on this policy or anything else, we have an Employee Assistance Programme, via Health Assured. You can call the team for support on emotional or employment law issues 24/7 on 0800 028 0199.

Guarding Against Fraud

The organisation is committed to preventing, detecting, and responding to fraud, bribery, and corruption. Staff must remain vigilant, report concerns promptly and comply with established counter-fraud controls and procedures.

Equality, Diversity and Inclusion

At Thames Hospice, our vision is "Quality of life to the end of life, for everyone." We are committed to making equality, equity, diversity, and inclusion (EEDI) central to who we are

and how we serve. We believe an inclusive culture—where everyone feels respected, valued, and heard—is vital to delivering compassionate, high-quality palliative and end-of-life- care for all.

We lead by example, embedding EEDI in our governance, strategy, and daily practice, and we hold ourselves accountable through meaningful action that reflects and supports the communities that we serve.

Purpose of this policy – Aim and Scope

Aim

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Purpose

This policy provides a consistent framework for the responsible marketing and promotion of all Thames Hospice regulated gaming and gambling products by:

- Ensuring compliance with the relevant legal and advertising standards.
- Safeguarding those children and vulnerable persons.
- Promoting transparency and honesty in all communications.
- Maintaining the integrity and reputation of Thames Hospice.

Scope

This policy applies to:

- All Thames Hospice employees, volunteers, agencies and third parties involved in gaming and gambling marketing or sales.
- All marketing materials and activity (including but not limited to print, digital, outdoor, broadcast, social media and direct mail).
- All current and future regulated gaming and gambling products operated by Thames Hospice.

This policy is for use by Thames Hospice employees only. It does not form part of your contract of employment and may be changed at any time.

Any part of this policy may be varied in individual cases, without prejudice, and with the mutual consent of all parties. This includes if you have a disability, where reasonable adjustments will be made to all provisions, criteria, and/or practices within this document to cater for your needs. Please contact People Services for help with reasonable adjustments.

In this policy, references to you/your refer to an [employee/volunteer/patient/contractor/visitor/customer] of Thames Hospice to whom this

document applies. References to we/us/our refer to Thames Hospice, or an authorised person acting on behalf of Thames Hospice.

Responsibility

All staff, volunteers, and agencies involved in the marketing and promotion of Thames Hospice gaming and gambling products (including lottery, superdraws, raffles and future products)

Ultimate Responsibility:

The Responsible Persons named on the Gambling Commission licence for Schedule X are ultimately responsible for ensuring compliance with the requirements of this policy.

First-line Responsibility:

The **Lottery and Regular Giving Manager** is responsible for the day-to-day implementation and oversight of this policy

Monitoring and Review

This policy will be reviewed annually or sooner if guidance changes from the Gambling Commission, ASA or BCAP.

This policy was approved on 2 October 2026 and will be reviewed before 2 October 2027.

Breach of Policy

Any deviation in practice may be deemed a breach of policy.

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

Principles of Social Responsibility

All Thames Hospice gambling marketing must:

- Be socially responsible and avoid presenting participation as a financial solution or investment opportunity.
- Never target or appeal to anyone under 18 years old.
- Uphold the highest standards of honesty and integrity.
- Where applicable, make clear how proceeds benefit the Hospice's charitable mission.
- Avoid misleading or exaggerated claims.

Gambling Commission Requirements

The following requirements ensure that Thames Hospice regulated gaming and gambling activity is conducted in line with the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), with a focus on fair, transparent and socially responsible operation. They cover both the marketing and promotion of products and the responsible distribution and management of tickets.

Marketing and promotions

- Marketing must be truthful, transparent and socially responsible.
- All significant conditions must be clearly stated at the point of sale and in advertisements.
- Where limited space restricts full terms, materials must indicate that terms apply and direct consumers clearly to full details (e.g. website link within one click or for printed material a clear URL).
- Terms and conditions must remain accessible.

Ticket mailing and distribution

To minimise risk and uphold integrity:

- Tickets must not be mailed unsolicited to unknown supporters.
- Ticket value sent to any individual supporter address must not exceed 36. This does not apply to Supersellers or community groups.
- Records must be maintained for all distributed and returned tickets.

ASA and BCAP Code Compliance

Thames Hospice follows both the ASA CAP Code Section 16 (Gambling) and BCAP Code Section 18 (Lotteries).

Social Responsibility

All gambling marketing must be designed and distributed responsibly to protect under-18s and vulnerable people.

Prohibited Content

Thames Hospice marketing materials must **not**:

- Portray, condone or encourage irresponsible gambling behaviour (16.3.1).
- Exploit vulnerabilities or lack of knowledge (16.3.2).
- Suggest gambling solves personal, professional, or financial problems (16.3.3 and 16.3.4).
- Present gambling as indispensable or as a priority over family, friends or work (16.3.5).
- Imply gambling enhances attractiveness, confidence or success (16.3.6).
- Use peer pressure or disparage abstention (16.3.7).
- Associate gambling with seduction, toughness or recklessness (16.3.8 and 16.3.9).
- Suggest gambling is a rite of passage or preferable to social activity (16.3.10 and 16.3.11).
- Include anyone under 25 in a gambling context or significant role unless as a beneficiary of the charitable proceeds (16.3.12 and 16.3.14).
- Contain imagery, music, or characters that strongly appeal to under-18s (16.3.13).
- Exploit beliefs about luck or condone criminal or anti-social behaviour (16.3.15 and 16.3.16).
- Depict gambling in working environments (except licensed premises) (16.3.17).

Broadcast Media and Clearance

All broadcast advertising (radio, television, streaming, or on-demand) must comply with BCAP's broadcast-specific requirements.

Any advertisement broadcast on radio or television must be centrally copy-cleared through the relevant clearance system prior to airing.

Thames Hospice or its appointed agencies must retain evidence of clearance approval.

Scheduling and Media Placement

Broadcast advertisements must adhere to BCAP scheduling restrictions to avoid appearing in or around programming aimed at under-18s.

Marketing should never be placed in media environments or times where children or young people are the primary audience.

Digital advertising must employ available age-gating or audience exclusion tools to limit exposure to those under 18.

Ticket and Marketing Collateral Requirements

This section sets out the information that must or should be included on Thames Hospice lottery, superdraw, raffle and other gaming and gambling marketing materials to ensure communications are clear, transparent and compliant with relevant regulatory requirements.

Mandatory information

All Thames Hospice lottery, superdraw and raffle tickets must display:

- **Name of the charity** i.e. Thames Hospice
- **Price of the ticket** e.g. £1
- **Name and address of the promoter** e.g. Thames Hospice, Windsor Road, Maidenhead, SL6 2DN. Responsible person(s): Jane Symmons and Jim Curry.
- **Date of draw** or an explanation of how the date is determined
- **License Details and Statement** e.g. Thames Hospice is licensed and regulated in Great Britain by the Gambling Commission under account number 25869
- **Link to the Gambling Commission Website** e.g. www.gamblingcommission.gov.uk

Recommended additional information

Related materials and where space allows, include:

- Link to the **rules of play** e.g. https://lottery.thameshospice.org.uk/lottery-policies/terms-conditions/.
- **Prize structure and process** e.g Our prizes are awarded by random number generator, 31 prizes are won every week, including our £1,000 jackpot**.**
- **Statement on proceed** e.g. “In the financial year 2025/26, Thames Hospice Lottery received £1,035,331 in ticket sales. 6.6% was spent on prizes, 11.2% was spent on administration, 13.2% was reinvested into growing our lottery programme to raise even more money and 69% went directly to the Hospice to fund care and services to patients and families.”.
- **Chance statement**, e.g. “1 in 625 chance of winning a prize.”.
- **Age restriction notice:** “Players must be aged 18 or over.”.
- **Signposting and safer gambling support.**
- **Disclosure of third party Gambling Commission suppliers** e.g. This website is provided by our External Lottery Manager, Sterling Management Centre Limited. Sterling Management Centre Limited are licensed and regulated in Great Britain by the Gambling Commission under account number 3137.
- **Display of the following logos:**
    - Thames Hospice.
    - Gambling Commission.
    - 18 + symbol.

- Fundraising Regulator logo.
- Gambling Support Logo

Governance and Oversight

All gambling-related marketing must be approved a member of the Lottery Fundraising team. High-risk campaigns should be reviewed by an individual holding a qualifying position under the licence.

Staff and suppliers must receive training on responsible gambling marketing and compliance obligations.

Breaches or compliance concerns must be reported immediately to the Fundraising Director and, if required, the Gambling Commission.

Governance and Oversight

Departments must maintain complete records of all gambling marketing materials, approvals and clearance evidence for a minimum of two years.

Archive campaign details, creative sign-offs and promotional terms for reference and audit purposes.

Document History

Date	Author	Approved by	Doc name	Comment	Responsible Committee	Next Review
2 Oct 2026	J. Curry	J Symmons	Thames Hospice Marketing Gaming and Gambling Policy		Finance, Income Generation and Audit Committee	2 Oct 2026