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<b>Date approved:</b>	<b>05/03/2021</b>	<b>Approved by:</b> <b>Name</b> <b>Position:</b>	Rosie Knowles, Director of Income Generation Riyad Islam, Director of Finance and Resources Justine Burrows, Deputy Director of Income Generation
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<b>Other information:</b>			

## Social Responsibility Policy

### Policy Statement

St Clare Hospice Lottery is committed to providing a secure, fair and socially responsible service and to endorse responsible gambling for our lottery member. 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. This document sets out St Clare Hospice Lottery policy to ensure we conduct any gambling activities in a socially responsible way.

### Preventing gambling from being a source of crime and disorder

#### The Individual is aged 16 and over

When an individual joins the St Clare Hospice Lottery we will ensure the member is aged over 16. We have statements on all our documentation, marketing material, within our terms and conditions and on our website that states this is a

requirement of joining the St Clare Hospice Lottery. We reserve the right to ask an individual's date of birth prior to them joining.

### **Money Laundering**

In line with the Proceeds of Crime Act and April 2020 LCCP revisions, we will take action should unlawful attempts to purchase tickets take place. Please refer to Money Laundering Policy and Money Laundering Risk Assessment.

### **Ensuring that gambling is conducted in a fair and open way**

Players have access to clear information on matters such as the rules of the lottery and the prizes that are available. Our terms and conditions are available on our website and in paper form. A printed version of the Terms and Conditions is sent to all new members.

Any advertising and promotional material is clear and not misleading and will not include anything that could be deemed as attractive to children, eg, cartoons.

We follow the ASA code of conduct in regards to advertising

The results are made public. They are shown on our website each week.

A St Clare Lottery complaints procedure is in place which includes reference to the independent arbitration service, IBAS

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

#### **We give the following examples of groups of people who could be deemed as vulnerable**

Adults who don't have the mental capacity to make informed decisions, ie learning difficulties, dementia. People who are underage, homeless, frail and elderly or who have signs of substance addiction. People whom may have a gambling problem.

#### **How we protect vulnerable people**

It is illegal for individuals under the age of 16 to enter into a lottery. We reserve the right to ask for proof of age from any customer and customer's accounts may be suspended until satisfactory proof of age is provided. We reserve the right to ask for an individual's date of birth prior to their joining via our website. If for whatever reason, upon winning any individual is unable to prove that they are 16 or over then their stake will be returned, and any winnings will be forfeited.

We ensure our staff have Safeguarding and this is mandatory

We ensure that any third parties we work with undergo Safeguarding training and this is mandatory

We impose gambling limits by endorsing 3 weekly lottery entries per person and we contact players who request more than 3 weekly entries.

We identify individuals attempting multiple membership attempts

Our Lottery Software identifies players, by surname and postcode, who attempt to purchase an additional entry and we will contact them to verify. (See flow chart procedure)

### **Self-Exclusion.**

On request (completion of a self-exclusion form found on our website or posted out to a player) 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 try to ensure that the individual does not try and open a new membership. We will refund any funds against their lottery number.

All attempted breaches of self-exclusions will be recorded and filed.

### **Provide Information on Gambling Support Organisations.**

We provide a link on our website to [begambleaware.org](http://begambleaware.org). Information on Gambling support can be found in our Terms and Conditions which all new members receive. Through our membership to the Hospice Lotteries Association, we make an annual financial contribution to begambleaware.

Staff Training. All relevant staff and third parties receive awareness training on problem gambling issues and where to sign post our players if they do request this information.

**Appendix 1** gives more detail and additional information on St Clare Hospice's approach to Responsible Gambling.

### **Social Responsibility – responsibility for 3<sup>rd</sup> parties**

St Clare Hospice takes responsibility for third parties with whom they contract for the provision of any aspect of our lottery business related to lottery activities and will ensure that the terms on which they contract with such third parties:

- Require the third party to conduct themselves in so far as they carry out the activities on behalf of St Clare Hospice as if they were bound by the same licence conditions and subject to the same codes of conduct as St Clare Hospice.
- Oblige the third party to provide such information to St Clare Hospice as they may reasonably require in order to enable St Clare Hospice to comply with their information reporting and other obligations to the commission
- Enable St Clare Hospice, subject to compliance with any dispute resolution provisions of such a contract, to terminate the third party's contract (including particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives.
- St Clare Hospice only places digital adverts via third parties when an agreement is in place.

### **Training and ensuring appropriate awareness of Lottery Employees and Third Parties**

- a) All Lottery Employees and third parties will receive a copy of the following:

- Social Responsibility Policy
  - Lottery Terms and Conditions
  - Lottery Complaints Policy and Procedure
- b) All Lottery staff and third parties will have time with their line manager in which to read and ask questions about the above documents, and will then sign to acknowledge receipt and understanding, and the date that this took place.
- c) All Lottery staff will receive St Clare Hospice mandatory training including Health and Safety and Safeguarding.
- d) There is guidance available for St Clare Hospice employees to offer to those who indicate they may have a problem with gambling, and also on our website for individuals who have such concerns.

## **Appendix 1**

### **Responsible Gambling**

Whilst the majority of people do gamble within their means, for some gambling can become a problem.

St Clare Hospice Lottery have a Self Exclusion Procedure to support those who may have a problem with gambling, and to ensure St Clare Hospice employees take appropriate action in respect of this, once they are made aware that an individual may have such a problem.

Supportive Guidance for problems with controlling gambling can include:

- Gambling should be entertaining and not seen as a way of making money
- Avoid chasing losses
- Only gamble what you can afford to lose
- Keep track of the time and amount you spend gambling

If a player wants to have a break from the St Clare lottery they can use our self-exclusion option by filling in the form that appears on our website or by writing to the Lottery Manager. We will then refund any funds against their lottery membership number, close their membership(s) for a minimum period of 6 months, during which time it will not be possible for the account(s) to be re-opened for any reason.

If someone was to contact us if they were concerned that gambling may have taken over their (or someone else's life) then our staff would ask the following questions and sign post to helplines or other support:

Do you stay away from work, college or school to gamble?

Do you gamble to escape from a boring or unhappy life?

When gambling and you run out of money, do you feel lost and in despair and need to gamble again as soon as possible?

Do you gamble until your last penny is gone, even the fare home or the cost of a cup of tea?

Have you every lied to cover up the amount of money or time you have spent gambling?

Have others ever criticised your gambling?

Have you lost interest in your family, friends or hobbies?

After losing, do you feel you must try and win back your losses as soon as possible?

Do arguments, frustrations or disappointments make you want to gamble?

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