



Social Responsibility in Gambling Policy

For the purposes of this document, “staff” may refer to either Great Western Air Ambulance Charity (GWAAC) staff or staff of any External Lottery Manager (ELM) employed by GWAAC. With regards to our weekly lottery, this is Tower Lottery Partnership (TLP) staff. With regards to our raffles, this is Sterling Management Company Ltd staff. GWAAC discharges many of the responsibilities laid out in this policy to its ELMs through contractual agreement.

1. Purpose

Great Western Air Ambulance Charity (GWAAC) operates a lottery and occasional raffles to help raise funds to support its operations.

The charity is committed to ensuring that each draw is operated in a secure, fair and socially responsible way and to endorsing 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.

This document sets out the charity’s policies and approach to ensuring we approach any gambling activities in a socially responsible way.

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

When an individual joins any lottery or raffle we will:

- Check that the individual is aged 18 or over.
- Check that the individual is resident in the UK.
- Retain the right to terminate any player’s participation in a lottery that we promote should we suspect criminal activity.
- Only accept appropriate forms of payment:
 - We will not accept credit card payments for ticket purchases, unless that ticket forms part of a wider purchase of goods.
 - We will not accept cash for membership in our weekly lottery.
- Limit the maximum number of entries to:
 - £20 per person per week for our weekly lottery.
 - 50 tickets at £1 per ticket for raffle purchase made through our raffle website, or through face-to-face ticket sales.
- Ensure that all lottery related computers and software are password protected and accessible only by authorised members of staff.
- Adopt a strict and thorough reporting procedure if a member of staff and or another operator is found to be in any way operating in an illegal or suspicious manner.

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

We will ensure that:

- Players have access to clear information on matters such as the rules of any lottery or raffle, the prizes that are available and the chances of winning.
- The rules are fair.
- Any advertising and promotional material is clear and not misleading.
- The results are made public.
- We utilise tried and tested lottery software to administer our lotteries with a Random Number Generator in line with Gambling Commission regulations.

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

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

4.1. Age Verification Policy

- It is an offence for persons under the age of 18 to play the lottery.
- Systems will not allow the person to be entered on the lottery if they are under 18.
- Staff are trained to be aware of their responsibilities for preventing underage gambling and for returning stakes and not paying prizes to underage customers. Where lottery or raffle tickets are sold face-to-face, if it appears that the potential customer might be underage, our staff ask for proof of identity, establishing that the person is aged 18 or over before selling any lottery or raffle ticket to them. In the case of customers who apply for lottery or raffle tickets by post, we carry out random checks to ensure compliance with age restrictions.
- Examples of acceptable identification for age verification purposes include:
 - Passport
 - Driving Licence
 - Official Student Card

4.2. Protecting vulnerable persons

- Staff are trained to detect vulnerability in potential customers and politely decline offers of support from such individuals. People particularly at risk include the elderly, people with an intellectual disability and those under the influence of drugs or alcohol.

4.3. Gambling Limits

- We impose limits on the value of entries into our weekly lottery that can be purchased by an individual to £20 per week.
- We impose limits on the value of entries into any raffle that can be purchased by an individual online to £50 per transaction.
- If our staff have a concern that a customer's behaviour (signified for example by a sharp increase in their expenditure on lottery tickets or chances) may indicate problem gambling, they will be trained to report the matter to a responsible person on the licence or to the lottery manager, who will ensure the customer is contacted to discuss the matter, including the help that is available for problem gamblers. In

severe cases, consideration may be given to barring the customer from participating in the lottery.

- Also see 4.4.

4.4. Self-Exclusion

- GWAAC has procedures in place allowing an individual to self-exclude for a length of time – a maximum of 12 months - and will take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling through GWAAC's lottery or raffles. A customer who has made contact to request self-exclusion will be refused service and prevented from gambling with GWAAC. A request for self-exclusion will be available with immediate effect and with no "cooling off" period.
- During this period we will take all reasonable steps to ensure that the individual does not try and play any lotteries or raffles promoted by the charity and to prevent any marketing material related to gambling products being sent to them. We will remove the name and details of a self-excluded person from any relevant marketing lists and otherwise flag them as an individual to whom the associated marketing materials must not be sent within two days of having received the completed self-exclusion notification.
- The self-exclusion request will be entered onto the relevant lottery software system and will block any further requests to partake in gambling by using the following fields of data; surname, first names, address, postcode, telephone number and email.
- An individual when requesting self-exclusion will be informed as to what self-exclusion is and will be provided information on gambling support agencies. The main being:

www.gamcare.org.uk or telephone 0845 6000133

www.begambleaware.org.uk

Requests for self-exclusion for any lottery or raffle may be accepted in writing to:

GWAAC
County Gates
Ashton Road
Bristol
BS3 2JH

OR to:

GWAAC
C/O Tower Lottery Partnership Ltd
Unit C2, Waterfold Business Park
Bury
BL9 7BR

OR via telephone to GWAAC on 0303 4444 999

OR via telephone to Tower Lotteries on 0844 567 0844

- For our weekly lottery, the individual's lottery account will be closed. Any balances outstanding on that account will be refunded. Where an individual has paid by cheque, the amount from the last draw they were entered into, to the end date of their

subscription will be refunded by cheque within ten working days. Where an individual pays by Standing Order, they will have to contact their bank directly to cancel the Standing Order and we will refund them by cheque each month until such time as the Standing Order has been cancelled. Where an individual pays by Direct Debit, the Lottery Office will cancel the Direct Debit and make any refunds from the balances outstanding and any payments that may subsequently arrive.

- For raffles, any entries made by the individual to an active raffle campaign will be refunded.
- During the period of self-exclusion, they will in no way be entered into any GWAAC lottery or raffle draw, even if the individual has failed to cancel their Standing Order.
- After the self-exclusion period ends, if the individual wishes to recommence participating in one of the lotteries promoted by us, they must request in writing that they wish to be removed from the self-exclusion register. Once we receive this letter the individual will be given one day to cool off before being given the opportunity to recommence participation in GWAAC lotteries.
- The individual must be the one to take positive action to gamble again and no contact will be made by GWAAC until contact has been made by that individual.

5. Protection of customer funds

- All customer funds intended for the use in future gambling and/or lottery subscriptions will be held in a separate bank account or accounts relating to the relevant affiliated charity lottery and will be completely separate from the society's trading income.
- We are required by our licence to inform customers about what happens to funds which we hold on account for them, and the extent to which funds are protected in the event of insolvency.

<https://www.gamblingcommission.gov.uk/public-and-players/guide/page/if-your-money-has-medium-protection>

- We hold customer funds separate from GWAAC funds. This means that steps have been taken to protect customer funds but that there is no absolute guarantee that all funds will be repaid. This meets the Gambling Commission's requirements for the segregation of customer funds at the level: medium protection.
- Tower Lotteries Partnership operates a strict 'no cash policy' to prevent the risk of crimes such as money laundering, to avoid the giving of illicit credit and to provide assurances that gambling activities are being conducted fairly. Please contact GWAAC, County Gates, 3rd floor, Ashton Rd, Bristol, BS3 2JH for a copy of our cash handling and money laundering procedures.

6. Ensuring marketing compliance

- All advertising and marketing material must comply with the Gambling Act 2005, and all other subsequent statutory orders and amendments.
- This procedure applies to all printed marketing material, and all 'virtual' electronic media content, including internet websites, social media content and mobile telephone application content.

- All marketing material must contain the following, unless exempted (e.g. see section 7 below):
 - The name of the promoting society (GWAAC)
 - The price of the ticket for the relevant lottery or raffle
 - The name and address of the responsible person on the license
 - The date/frequency of the relevant draw
 - The fact that the GWAAC is “Licensed by the Gambling Commission.” including the license number under which GWAAC operates.
 - The Gambling Commission website www.gamblingcommission.gov.uk
- In the case of electronic media, it must be possible for the purchaser of the ticket to retain or print a document that contains all of the above.
- All advertisements must also comply with BCAP and CAP advertising guidelines, and these guidelines should be consulted before proceeding with any advertising material.
- No young person who is, or appears to be, under 25 years of age should be used in any advertising material, unless that material exclusively features the good cause benefits and does not include any explicit encouragement to buy a lottery product.
- No digital advertisements must appear on websites that provide unauthorised access to digital content, and any lottery-related adverts must not be placed with or by third-parties where editorial control of content cannot be guaranteed.

7. Promotion of the lottery by website/social media

- As it is an offence to sell tickets to under 18s, GWAAC must ensure that sale of remote chances does not inadvertently target or recruit lottery players using this media. Prizes that specifically target younger people under 25 years of age **must not** be offered as incentives or prizes.
- In addition, it is vital that the customer must have access to relevant information, on each individual webpage, e-mail, or other electronic communication.
- In the case of a social media ‘post’ or ‘tweet’, where space may be limited, the first landing page linked to the post/tweet must contain all six mandatory pieces of information.
- It is also further advisable in the interests of transparency that this information appears on all subsequent lottery related web pages.
- Any pages involving direct sign-up, or requests for further information, **must** contain full lottery and promoting society details.