



Social Responsibility Policy

Policy Context

The Trust is committed to ensuring that the Lottery is operated in a secure, fair and socially responsible way and to endorsing responsible gambling amongst its players. It expects the External Lottery Manager (ELM) to have the appropriate processes in place to ensure that these objects stand up to scrutiny. In particular:

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.

The Trust and its ELM operate in a socially responsible way to ensure any gambling is conducted in a fair and open way, crime free and protects children and other vulnerable people.

This document sets out policies and processes the Trust and its ELM (and contracted third parties) have towards operating a society lottery in a socially responsible way:

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

- All operating and remote systems adhere to industry standards and regulatory requirements.
- Players are aged 16 or over, resident in Great Britain and have their own bank account.
- Draws are adjudicated by an independent legal representative and completed on a secure, stand alone and certified draw engine.
- No cash subscriptions are offered.
- Any suspicious activity is reported to the Gambling Commission and, if appropriate to the Police under the Proceeds of Crime Act 2002 and the Terrorism Act 2000.
- Safeguards are in place to prevent fraudulent transactions and claims in partnership with payment providers.
- An annual audit of IT security processes and finances is undertaken by independent assessors.

- The Trust and ELM ensure there is a business continuity provision to guarantee key functions are always managed by a responsible PML holder.
- Each new player signs up one month in advance, prizes are paid to playing accounts only and Fraudguard is used on payments taken online.
- The Trust and its ELM manage all details relating to beneficiaries, players, bank account details and personal information securely and in accordance to the requirements of the Data Protection Act.
- No player's details will be passed to third parties and annual audits are undertaken to review the process.

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

- Players are provided with clear information on the rules of the lottery and prizes available.
- Changes to T&Cs are submitted to the Gambling Commission 28 days in advance.
- The rules are fair and results are made publicly available online.
- Any advertising and promotional material is clear, not misleading and follows licence requirements and industry standards.
- Players are aware that the Lottery is licensed and regulated by the Gambling Commission.
- Tickets indicate the promoting society, prizes, details of the society, dates of the draw and price of the ticket.
- A complaints process is in place to deal with any issues in a clear and procedural way with Alternative Dispute Resolution (ADR) options communicated.
- ADR provision is provided by an approved provider.
- Lottery proceeds are held in a client call account separated from other trading income in order that player funds can be returned in the event of the ELM going into liquidation.
- Training for all staff on licensing objectives and operating responsibilities takes place frequently. A mandatory annual session for all staff is organised.
- Personal Management Licence (PML) holders are actively responsible for their key functions.
- Players know of the work of the Trust and what they are supporting.
- The Trust and the ELM regularly review and update the approach to risk management.
- Any player can be provided with payment and winning history upon request.
- The ELM appointment agreement is reviewed annually.

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

- Advertising does not:
 - Encourage gambling that may lead to socially irresponsible acts or could lead to financial, social or emotional harm.
 - Exploit children or other vulnerable persons.
 - Suggest gambling can solve financial problems or debts.
 - Suggest gambling can increase attractiveness or sexual success.
 - Link gambling to youth culture or attempt to attract young persons to gamble.
- Gambleaware information is provided to players with a gambling problem.
- There is an age verification process and dip sampling to ensure this is robust in its application. A player can self-exclude for 6 months up to 12 months.
- A customer care process creates an alert when a player subscribes with more than six tickets.
- A self-exclusion policy and procedure is in place to protect vulnerable individuals.
- Action to combat addictive gambling is taken through membership of the Lotteries Council.
- A duty of care to winners respects their right to confidentiality.
- Access to counselling services is available to staff suffering from gambling addiction.
- The ELM business model supports the Trust's commitment to social responsibility.

Data Protection

Legal requirements

The Trust will adhere to all relevant legal requirements in order to promote its Lottery and our ELM has significant experience in operating responsible processes within the legal framework required for the business.