



WILLOWBROOK HOSPICE LOTTERY

POLICY AND PROCEDURES FOR SOCIAL RESPONSIBILITY

Introduction

Willowbrook Hospice Trading Company Limited operates a Lottery for the general public in the St Helens and Knowsley area, for the sole purpose of raising funds for Willowbrook Hospice

Willowbrook Hospice Trading Company Ltd. is committed to ensuring that the Lottery 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:

- 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 the Hospice Lottery's policies and procedures to ensure we approach gambling activities in a socially responsible way.

2 Compliance with Statutory Requirements

Gambling Commission's licensing and Codes of Practice document (LCCP).

3 Related Policies / Procedures

- Compliments and Complaints Policy
- Self - Exclusion Policy
- Responsible Gambling Policy.

4 Scopes

The policy applies to all employees of the hospice and all staff working on behalf of Willowbrook Hospice Trading Company Limited including temporary staff, volunteers and students.

5 Policy Statements.

5.1 Preventing gambling from being a source of crime and disorder, being associated with crime and disorder, or being used to support crime.

5.1.1 Avoidance of Money Laundering

Staff will draw to the Trading Company Manager's attention any one player who requests to purchase more than 5 tickets per draw.

A record will be kept of any such incidents involving staff intervention/customer interaction. A note will be inserted on the member's record of the electronic database.

5.1.2 Minimising the risk of loss/theft of cash from 'Collection' members

Members recorded as non-payers on 2 consecutive collections (8 weeks), are contacted by letter. If information is received from the collector that the member is on holiday/hospital then the timing of the process may vary, i.e. 9 or 10 weeks as opposed to 8.

Rounds (list of members allocated to a collector and grouped by area – issued with a round number) are chosen on a random ad hoc basis. Identified rounds receive communication via either telephone or letter to review the current payment method. This acts as both an audit of current payments and a reminder for the member of alternative secure methods of payment.

5.1.3 Minimising the risk of loss/theft of cash received into the Lottery Office

All monies received into the office are recorded on a log sheet which is dated and signed by both the deliverer and recipient.

All monies are held in a locked safe, until checked against paperwork, whilst the office is in operation. After checking, all monies are locked in the safe. The key is held by a nominated employee and all cash is stored in the safe overnight.

All monies are banked as soon as possible. Cash is collected from the Lottery Office by two members of staff, who signs for the collection and bring back evidence of deposit to the bank.

Regular review of payment methods are conducted to convert collection members to cheque/standing order/direct debit, thereby continually reducing the level of cash entering the office.

5.1.4 Minimising the risk of loss/theft of cash

All counterfoil slips are kept until bank statements and deposits have been reconciled, and then until the yearend audit, after which they are archived.

5.1.5 Access to premises

All Lottery staff are aware that:

- They must co-operate fully with the Gambling Commissions Compliance Officers.
- They must check the identity of such Compliance officers before entry is authorised.
- They must allow reasonable access to premises required by the Officer in the conduct of their work; they must provide any information whether written or electronic, relating to the operation and management of the Lottery system as required by the Compliance Officer.

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

Fair and Open Provisions

- A description of how the Lottery works is sent with the new members' letters. A copy of the Lottery Terms and Conditions is available on the Hospice website.
- The rules of the Lottery are fair.
- Any advertising and promotional material is clear and not misleading.
- The winner numbers results are made public.

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

5.3.1 Combating Problem Gambling (Social Responsibility)

Willowbrook Hospice trading Company Limited give a financial contribution, via the Hospice Lotteries Association, of which we are a member, to the Responsibility in Gambling Trust (RIGIT), an organisation set up with the sole aim of promoting and encouraging responsible gambling, funding GAMCARE and providing access to support where needed. The Lottery home page has links to, GAMCARE www.gamcare.org.uk, GAMBLEAWARE WWW.GAMBLEAWARE.CO.UK, and RESPONSIBLE GAMBLING www.responsiblegamblingtrust.org.uk

5.3.2 Access to Gambling by Children and young Persons (Social Responsibility)

All Lottery staff are aware that underage play is an offence and they are also aware of the actions to take to prevent it.

Lottery application forms have a tick box and declaration that the member is over the age of 16 and also have a field to capture the date of birth of the member. If neither of these fields is completed, the application will not be processed until we can verify the age of the member.

Any canvasser or other person who may sign on a new member knows to use their own judgement when deciding whether a customer is 16 years or over.

If a customer looks under the age of 16 years then they would be asked to produce proof to confirm they are 16 years or over.

In the event of a customer applying for membership on behalf of a third party the seller knows to ask for confirmation of the third party's age.

All prizes are awarded by cheque made payable to the customer. In the event of any winner not having a bank account we would exchange the cheque for cash but only after being satisfied that the person is 16 years of age or over.

In the event of a winner's cheque being awarded to a person under the age of 16 years, steps would be taken to recover the prize money and return the stake money.

5.3.3 Information on How to Gamble Responsibly and Help for Problem Gamblers.

Information relating to problem gambling via reference to, GAMBLEAWARE and GAMCARE is included on the Lottery homepage of the Hospice website. Reference to GAMBLEAWARE is also included on all our printed literature, as required by The Gambling Commission.

5.3.4 Customer Interaction

The limit set for number of draw entries is 5 per week per person. Anything above this requires approval by the Trading Company Manager.

Staff are aware that they can refuse service to customers if they have any concerns that problem gambling or crime may be involved.

Staff are aware that they must report any such incident to the Trading Manager as soon as practicable.

The Trading Company Manager will exercise discretion in dealing with staff concerns and treat every case on its merits, e.g. a grateful relative buying a large number of tickets or donor wishing to make a donation by way of the Hospice Lottery.

The Trading Company Manager will contact the customer either in person or by telephone to discuss and resolve any concerns.

5.3.5 Self-Exclusion

If a member wishes to self-exclude themselves from subscribing to the Hospice Lottery they can either telephone through to the office, deliver in person, or by letter to the Trading Company Manager.

We will take all reasonable steps to refuse service or to otherwise prevent an individual who has requested self-exclusion from participating in any further lottery draws for 6 months from the date of exclusion.

If requested any funds that are held in credit for the member will be returned to exclude entry in any further lottery draws.

We will take steps to remove the members details of any self-excluded individual from any marketing databases used by the Hospice (or otherwise flag that person as an individual to whom marketing material must not be sent) within two days of receiving the self-exclusion request.

5.3.6 Complaints and Disputes

Lottery staff are aware that a 'complaint' means a complaint about any aspect of the Hospice's conduct of the licensed activities and a 'dispute' is any complaint which:

Is not resolved at the first stage of the complaints procedure; and
Relates to the outcome of the complainant's gambling transaction.

Lottery staff are aware of how to deal with/resolve any complaints or disputes.

We will ensure that:

Members will be told the name and status of the person to contact about their complaint;
They will be sent a copy of the complaints procedure on request or on making a complaint;
All complaints will be handled in accordance with the procedure.

In the event that a dispute cannot be resolved then it will be referred to arbitration. For the Hospice, as a member of the Hospice Lotteries Association, this will be the "Independent Betting Adjudication Service".

A record will be kept of all complaints or disputes.

6 Responsibilities /Accountability

The ultimate responsibility for the policy is held by the board of Willowbrook Hospice and the accountability for the implementation of the policy the Trading Company Manager.

7 Policy Monitoring and Review

Monthly at the Hospice Governance meetings.

8 Staff Training Requirements

To comply with the requirements of LCCP, staff will be requested to familiarise themselves with this policy. Attention will be drawn specifically to the prevention of underage gambling and helping problem gamblers.

Leaflets will be made available and posted on the office notice board on "Supporting a problem gambler" and "Gambling problem".

Time will be made available for any member of staff who wishes to discuss the policy contents and any implications it may have on the current role that they perform.

A record of staff confirming their understanding of the policy will be held at the front of the file containing the hard copy of the document.