

The Children's Hospital Charity Responsible Gambling Policy

1. Rationale for Policy Development

The Gambling Act 2005 (the Act), governs the way The Children's Hospital Charity raffles are operated. The Gambling Act is regulated by the Gambling Commission set up to monitor gambling activity in the UK.

The key requirement of the Act is that all holders of Gambling Commission licences must have a responsible gambling policy to ensure:

1. Gambling is conducted in a fair and open way
2. They are protecting children under the age of 16 and other vulnerable persons from being harmed or exploited by irresponsible gambling
3. They are preventing gambling (e.g. The Children's Hospital Charity raffles) from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

The Act also places a responsibility on the licence holder i.e. The Children's Hospital Charity, to promote socially responsible gambling.

Fundraising activity involving gambling at The Children's Hospital Charity is currently limited to £1 per entry raffles and although these activities are generally considered to be low risk for problem gambling, as a holder of a licence which promotes and operates raffles, The Children's Hospital Charity will at all times adhere to the legal requirements of the Act.

This policy is in place to ensure that people take part in The Children's Hospital Charity raffles responsibly in accordance with the requirement of the Act.

The Children's Hospital Charity is licensed to operate raffles by the Gambling Commission.

The Children's Hospital Charity has a non-remote operating licence issued by the Gambling Commission, in order to enable it to operate and promote raffles.

2. Policy

Definitions

The Children's Hospital Charity Lottery – Any lottery or raffle operated by or on behalf of The Children's Hospital Charity.

Non-Remote Lottery – A lottery in which persons are invited to participate through door to door and venue canvassing, or by normal letter post.

The Children's Hospital Charity will operate its Raffles in accordance with the Gambling Commission's general Licence Conditions and associated Codes of Practice (Licence Conditions and Codes of Practice - LCCPs) under the Gambling Act 2005, which set out the

general conditions attached to both operating and personal licences, together with outlining the principal codes of practice.

This policy will be updated to reflect any future changes to the LCCPs, or indeed any changes introduced by the Commission in the form of supplements to the LCCPs.

Fair and Open Draws

The Children's Hospital Charity will ensure that all:

1. Terms and conditions for the running of raffles are fair and open and are available to a participant who may request them
2. Terms and Conditions are published on The Children's Hospital Charity's website (www.tchc.org.uk). Customers will be notified of any changes to the terms before they come into effect
3. Manual draws will be witnessed by at least one independent representative other than that person manually selecting the winning tickets. These will be recorded.
4. Winning numbers will be published on The Children's Hospital Charity's website.
5. Prize winners prizes will be delivered direct to the place of purchase of the ticket and the prize winner will need to meet there. Ideally all efforts will be made to meet the 1st prize winner at The Children's Hospital Charity. Should the charity move towards having financial prizes any prize winners cheques will be posted directly to the winner.

Children and Vulnerable Persons

The Children's Hospital Charity will not permit vulnerable people or any person under the age of 16 to participate in a lottery or any other form of gambling.

The lottery rules and any lottery marketing and promotional literature, including any raffle tickets, will adequately and effectively advertise the minimum legal age.

The Children's Hospital Charity has implemented the following procedures to ensure that its raffles do not attract children under the age of 16:

1. The Children's Hospital Charity staff, volunteers and representatives who are selling tickets for non-remote raffles will request any entrant who appears to be under the age of 16 to:
 - a. Produce appropriate proof of identity and age before being allowed to purchase a lottery ticket
2. Lottery ticket sellers will be advised that it is a criminal offence to invite or allow a child under 16 years of age to enter a society lottery
3. We will immediately suppress any data which is found to inadvertently include any persons under the age of 16.

4. If a person enters a The Children's Hospital Charity raffle stating that they are over the age of 16 years and subsequently it is found that they are less than 16 years of age, they will have any money paid in relation to the lottery returned to them and where relevant will automatically forfeit the right to any prize.
5. We will review on an annual basis the methodology adopted in order to establish whether or not a potential or actual customer is over 16 years old and will implement all reasonable improvements that may become available as technology advances and as information improves.

The Children's Hospital Charity is committed to ensuring that lottery tickets are not knowingly sold to other vulnerable people and will politely refuse to accept any further participation from people who have been discovered to be vulnerable or are suspected of being vulnerable, typically by recommending that the customer speaks with a carer or family member, before proceeding further with the gambling transaction.

Crime and Disorder

The Children's Hospital Charity is committed to preventing gambling from:

1. Being a source of crime or disorder
2. Being associated with crime or disorder or being used to support crime.

The Children's Hospital Charity will refuse to be associated with any proposed lottery/raffle scheme or other gambling activity that may breach the law.

The Children's Hospital Charity will refuse to contract with any contractors or agents who are suspected of being associated with any potential or actual criminal activities.

The Children's Hospital Charity will themselves and will require all suppliers to provide information about responsible gambling and access to information and help in respect of problem gambling to all relevant partners associated with The Children's Hospital Charity's raffles.

Sellers of raffle tickets on behalf of The Children's Hospital Charity will take payment from the customer as cash straight into a secured collecting Children's Hospital Charity device.

The Children's Hospital Charity will maintain records of all tickets distributed and all tickets not returned.

The Children's Hospital Charity will provide the Gambling Commission with any information which may relate to the commission of an offence under the Act.

Apparently suspicious or fraudulent transactions must not be accepted. Under the Proceeds of Crime Act 2002, all qualified persons, employees and self-employed agents:

1. Have a legal obligation to report any known or suspected use of monies obtained illegally (the proceeds of crime) being used to gamble. Failure to report any such incidents will be seen as helping money launderers and could lead to prosecution
2. Must report any known or suspected use of the proceeds of crime in gambling to their manager / supervisor. All reports will be held in the strictest of confidence and will be passed on to the National Crime Agency (NCA - which replaced the Serious Organised Crime Agency (SOCA) in October 2013) for further investigation, by The Children's Hospital Charity's nominated Money Laundering Reporting Officer, via a Suspicious Activity Report (SAR*), inclusive of an NCA issued Unique Reference Number (URN).

The Children's Hospital Charity's Money Laundering Reporting Officer (MLRO) is David Vernon-Edwards.

Responsible Gambling

The Children's Hospital Charity has put in place the following procedures to encourage people to gamble responsibly and seek help should gambling become a problem.

1. All ticket despatches are recorded and players can request a self-exclusion from our database for future participation in gambling
2. The Children's Hospital Charity is committed to ensuring that information about responsible gambling and accessing information and help in respect of problem gambling is readily available to all. The raffle rules and any raffle marketing and promotional literature, including invitations to purchase raffle tickets will, as far as is reasonably possible, advertise the Gamble Aware logo, the Gamble Aware website and the GamCare National Helpline number (0808 8020 133), with the following supporting text:

"If you feel you have a problem with gambling, visit www.gambleaware.co.uk or call the GamCare National Helpline on 0808 8020 133."

Problem Gambling

Whilst the majority of people do gamble within their means, for some gambling can become a problem. It may help you to keep control to remember the following:

1. Gambling should be entertaining and not seen as a way of making money
2. Avoid chasing losses
3. Only gamble what you can afford to lose
4. Keep track of the time and amount you spend gambling
5. If you need to talk to someone about problem gambling then contact GamCare.

GamCare is a registered charity that provides confidential telephone support and counselling to anyone who is affected by problem gambling. GamCare can be contacted confidential helpline on 0845 6000 133 (local rate from UK) where trained counsellors are available to help with any concerns you may have on your own behalf or on behalf of family or friends or visit their website www.gamcare.org.uk for further information.

The Children's Hospital Charity will endeavour to ensure that it identifies and reacts to any suspected problem gamblers.

If The Children's Hospital Charity receives an application to participate in its raffle from a suspected problem gambler:

1. Any requests for any raffle tickets in excess of the recommended maximums (£50) will be refused
2. The customer will be referred to GamCare.
3. The customer's details will be logged in The Children's Hospital Charity's database for the purposes of possible exclusion from future participation in future raffles.
4. Future written and verbal communications should be monitored.

If an existing customer was suspected of becoming a problem gambler:

1. Any request for any additional entries will be refused
2. The customer will be referred to GamCare
3. The customer's details will be suppressed and will be excluded from future lottery participation and mailings
4. Future written and verbal communications should be monitored.

The Children's Hospital Charity will ensure that any person who has asked to be suppressed from raffle mailings is not contacted by The Children's Hospital Charity for these purposes.

Self-Exclusion From Gambling

If an existing customer self-excludes from gambling:

1. The Children's Hospital Charity will ensure that any person who has asked to be self-excluded from gambling will be removed from any gambling related marketing databases within two weeks of The Children's Hospital Charity receiving the completed self-exclusion notification and will be excluded for a minimum of six months, with the option of excluding for up to a maximum of five years. Self-excluders will not then receive any future gambling-related marketing materials, unless after the minimum period of six months has expired and the self-excluder takes positive action in order to gamble again and has specifically agreed to such materials. Self-excluders will be given a one day cooling-off period before being allowed to begin gambling again, but only in the event that they choose not to renew

the self-exclusion and make a positive request to begin gambling again, either by telephone or in person

2. Self-excluders who express a wish to be specifically excluded from participating in The Children's Hospital Charity raffles due to gambling related problems such as gambling with money they cannot afford to lose, will be given the opportunity to self-exclude from gambling immediately, without any cooling off period and to consider self-exclusion further e.g. to discuss with problem gambling groups such as GamCare
3. All communication between staff and self -excluders or suspected problem gamblers will be recorded in writing and monitored and approved by the senior manager responsible for raffles.

If The Children's Hospital Charity receives an application to participate in the lottery from a person who has previously advised The Children's Hospital Charity that they have excluded themselves from participating in gambling:

1. The application will be rejected and the prospective customer will be advised in writing of the reasons for rejection and referred to GamCare
2. All communication between staff and self -excluders or suspected problem gamblers will be recorded in writing and monitored and approved by the senior manager responsible for raffles.

Complaints

All complaints relating to raffles and gambling will be handled in accordance with The Children's Hospital Charity's Complaints & Disputes Policy and will be reported to the Gambling Commission on an annual basis, via the Annual Regulatory Returns.

Financial requirements

All money received by The Children's Hospital Charity will be handled in accordance with The Children's Hospital Charity's finance and cash handling policies.

Marketing and Advertising

All advertising of gambling products and services will be undertaken in a socially responsible manner. The Children's Hospital Charity will comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) which apply to the form and media in which they advertise their gambling facilities or services. For media not explicitly covered, The Children's Hospital Charity will apply the principles included in these codes of practice as if they were explicitly covered. The Children's Hospital Charity will also follow any relevant industry code of practice on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

The Children's Hospital Charity will research guidance that CAP and BCAP issues about advertising lotteries prior to undertaking advertising.

The Children's Hospital Charity will ensure that no-one who is, or appears to be under 25 years old will be featured gambling.