

NWAA/FONWAA Lotteries and Raffle Social Responsibility in Gambling Policy

Across all of North West Air Ambulance (NWAA/FONWAA) services and activities we aim to provide the highest possible quality service to those individuals and organisations interacting in any way with the organization.

Friends of North West Air Ambulance (NWAA/FONWAA) are committed to ensuring that the lottery, raffle or any other gambling related product used to raise funds for NWAA/FONWAA are operated in a secure, legally compliant, open, fair and socially responsible way and to endorsing and assisting responsible gambling amongst its players and potential customers.

This document sets out the NWAA/FONWAA policies and procedures that ensure any gambling activities are approached in a socially responsible way.

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on the 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.

NWAA/FONWAA Lottery adheres to the practices outlined in this policy and is regulated by The Gambling Commission.

Preventing gambling from being a source of crime and disorder

When an individual wishes to play our lottery or seasonal raffle, we will check that:

- The individual is aged 18 or over
- The individual is a resident in Great Britain
- We retain the right to terminate any player's participation in a lottery or draw that we promote should we suspect that the player is under age, is taking part in criminal activity or appears to be unable to make an informed decision to gamble.
- We keep all cash equivalents, debit card details, lottery/draw tickets and personal data safe and secure.
- We limit the maximum number of weekly lottery entries to 20 per person per week and the number of Raffle tickets to 50 per person per draw.
- All lottery and raffle related computers and software are password protected and accessible only by authorised members of staff.

- We adopt a strict and thorough reporting procedure if a member of staff or another operator is found to be in any way operating in an illegal or suspicious manner.
- We have procedures to report the suspicion of, or evidence of, money laundering or terrorist financing to the National Crime Agency (NCA).

Ensuring that gambling is conducted in a fair and open manner

We ensure that:

- Our terms and conditions ('T&Cs') for all gambling products are fair, transparent, easily legible, not misleading, and are available both online and via the NWAA/FONWAA office.
- Players have access to clear information on matters such as the rules of the lottery and raffles, how the lottery and raffles work, the cost of entries, the prizes that are available and the chances of winning if they can be calculated in each case.
- All lottery and draw tickets have the name and contact details of the person responsible for the particular lottery/draw such that any person may contact them and resolve any queries they might have.

The rules are fair and not misleading.

- Any advertising and promotional material is clear and not misleading.
- Any marketing material complies with the ASA CAP code and BCAP code for lotteries.
- The results are made public and also available on the NWAA/FONWAA website and its office.
- We operate a simple two stage 'Complaints and Disputes' procedure in the unlikely event an issue should arise.
- We utilise Gambling Commission licensed, tested and approved lottery software to administer our lotteries with a tested Random Number Generator (RNG) compliant with Gambling Commission licence conditions and codes of practice.

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

We use our best endeavours to address the following issues:

Age Verification

- Persons under the age of 18 are not allowed to play the lottery.
- It is an offence to play or attempt to play in any society lottery if they are under the age of 18 years old.
- Systems will not allow the person to be entered in 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 players.

Raffle players who do not self-verify on ticket stubs may be omitted from the draw and the monies will be taken as a 'donation'.

- Underage players or attempted play must and will be reported to the Gambling Commission.
- Where lottery tickets are sold face to face, if it appears that the potential customer might be underage, our staff ask for photographic proof of identity, establishing that the person is aged 18 and over before selling the lottery or draw ticket to them.
- In the case of customers who apply for lottery/draw tickets by post, we carry out random checks to ensure compliance with age restrictions.
- Our CRM system sends an alert to Lottery staff should a minor (under 18) be flagged as a Lottery player.
- Examples of acceptable identification for age verification purposes include:
 - Passport
 - Driving licence
 - Official student card

Should we find an instance of underage gambling (i.e. a member who is under the age of 18) we must:

- Refund any money they have paid us
- Not pay out any prizes due to go out
- Check if any prizes have been paid out and if so, contact the person to request refund of this prize.

Protecting vulnerable persons

- Staff are trained to recognise potential vulnerability in customers and politely decline requests to purchase lottery or draw tickets.
- People particularly at risk include the elderly, mentally disabled and those under the influence of drugs or alcohol.
- Not being able to understand language, deafness, blindness and other medical conditions such as progressed dementia or Alzheimer's disease may also prevent a person from making and/or remembering an informed decision to gamble.
- As a member of the Lotteries Council, an annual donation is made on our behalf to GambleAware in support of research into and the treatment of problem and addictive gambling.

Gambling Limits and Customer Interaction

- NWAA/FONWAA operate a customer interaction procedure which is triggered if a customer requests more than a pre-set limit / value of tickets or entries into a lottery or draw or if their behaviour is suspicious or gives grounds for concern.
- NWAA/FONWAA limits the maximum number of weekly lottery entries to 20 per person per week and the number of Raffle tickets to 50 per person per draw.
- 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 or their overall demeanour) may indicate problem gambling or vulnerability, they are trained to report the matter to the responsible person.
- The responsible person or a member of staff will contact the customer to discuss the matter, including raising awareness of the help that is available for problem gamblers if appropriate.
- In severe cases, consideration may be given to barring the customer from participating in the lottery.

Self-exclusion

The NWAA/FONWAA has procedures in place allowing an individual to self-exclude from any or all gambling products for a length of time – usually between the minimum of six months and five years 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.

- A customer who has made contact to request self-exclusion will be refused service and prevented from gambling in the selected products.
- A request for self-exclusion will be available with immediate effect and with no “cooling off” period.

Provision of help and support information

- NWAA/FONWAA staff are able to supply information or signpost external information relating to where help and support can be provided to those people who may wish to reduce or stop gambling.
- Organisations such as GambleAware and Gagambling.
- Organisations such as GambleAware and GamCare can do this either by telephone, literature or face to face support.
- Customers and/or players are genuinely encouraged to ask in confidence of any member of NWAA/FONWAA staff for any information that they may need or may find helpful. Please ask us, we promise we will understand and help you.
- Customers should consider the use of ‘Parental Filtration’ software such as ‘Net Nanny’ and similar offers to mitigate the risk of a child attempting to sign-up online for our Lift Off Lotto.