

Lottery policies

Our raffles comply with the following policies:

Law and disorder policy

- Children with Cancer UK will refuse to be associated with any proposed lottery scheme or other gambling activity that may breach the law.
- Children with Cancer UK will refuse to contract with any contractors or agents who Children with Cancer UK suspects may be associated with any potential or actual criminal activities.
- Children with Cancer UK will only use suppliers who are licensed by the Gambling Commission (External Lottery Managers), to run all or part of Children with Cancer UK's own lottery/ raffle business.
- Our External Lottery Manager keeps a record of all lottery entries sold.
- Our External Lottery Manager is able to provide information for any police checks of a Lottery Ticket seller that may be carried out. They are able to provide address details and details of any monies sent in for tickets received.
- Our External Lottery Manager operates from secure premises, with fire safes in situ, and with contractors such as G4S.
- Our External Lottery Manager processes all entries and handles all monies received for a lottery, all monies are paid directly in to Children with Cancer UK's bank account, and banking reports are issued by our External Lottery Manager on a weekly basis.
- Children with Cancer UK will require suppliers and contractors to ensure that all staff and contractors who are likely to be engaged with Children with Cancer UK to obtain relevant references.
- Children with Cancer UK will monitor their staff and self-employed agents on an ongoing basis, particularly regarding their direct or indirect association with potential criminal activities.
- Children with Cancer UK will only use gambling software (a Random Number Generator (RNG)) produced by CFP Lottery and Raffles Ltd who have been

- licensed by the Gambling Commission to manufacture, supply, install or adapt gambling software to promote a lottery/ raffle.
- Children with Cancer UK will ensure that it reports any actual or suspected criminal activities to the police.
 - Children with Cancer UK will expect that any suppliers or consultants who are associated with their lottery/ raffle will report any potential and actual criminal activities to Children with Cancer UK as soon as possible
 - Children with Cancer UK will expect that any suppliers or consultants who are associated with their lottery/ raffle will cooperate fully with the police and Gambling Commission should any actual or suspected criminal activities arise.
 - Children with Cancer UK Staff involved in promoting lotteries/ raffles or selling lottery/ raffle tickets face to face or via telephone will be trained to a satisfactory standard to ensure compliance with Children with Cancer UK gambling policy and procedure.

Fair and open draws policy

- All draws are conducted at the External Lottery Manager's premises using a random number generator.
- Draws are conducted at random using either a random number generator or using a blind draw.
- Winning numbers associated with the raffle or lottery will be published on the Children with Cancer UK website, with abbreviated details of winners. Winning numbers shall also be available by contacting Children with Cancer UK's Supporter Care Team.
- Rules are published on the Children with Cancer UK Lottery website and with mailed lottery marketing literature.
- Printed versions of rules are available on request.
- Children with Cancer UK have a complaints procedure in place (please see below).
- A record is kept of both online and offline sales.

- Children with Cancer UK will reserve the right to offer alternative prizes of equal value if, due to circumstances beyond its reasonable control, the stated prizes are no longer available.

Responsible gambling/ problem gambling procedure

- Children with Cancer UK has put in place the following procedures to encourage people to gamble responsibly and seek help should gambling become a problem:
- The National Gambling Helpline number and Gambleaware.co.uk website address is included on all tickets and entry forms to lotteries as well as our website address that includes information on gambling.
- Information is displayed on our website encouraging people to gamble responsibly and to recognise the signs of problem gambling. We also include the National Gambling Helpline and website details for people to refer to should they need further help.
- Players can request a self-exclusion to be added to the Children with Cancer UK database so that they are removed from further addressed lottery communications including post, telephone, email and SMS. All self-exclusion requests along with the date of the request will be captured on the record on the Children with Cancer UK database and will be in place for a minimum of six months. All reasonable steps will be taken to prevent any self excluded individuals participating.
- Self exclusion can be requested by contacting customer services or through an automated process using remote communication.
- Self exclusion flags will be added to the database within 2 working days of receipt. A record of card numbers to be excluded will also be kept where this is possible and complies with other legislation.
- Staff are trained on self exclusion and will signpost counselling and support services.

- To stop receiving unaddressed mail delivered by your postman, visit [the Royal Mail website \(link is an external\)](#).
- Self excluded customers will have any accounts closed and funds returned to them.
- Where customer behaviour indicates problem gambling they will be contacted by our External Lottery Manager's Supporter Contact Team under supervision of senior management and will follow procedures for this contact.
- A restriction of 5 lottery lines per customer will be in place unless customer interaction occurs. Interactions will be recorded and where the entries are purchased beyond the limit, records will be kept for 3 years.
- All relevant sources of information will be used to identify customers at risk of problem gambling.
- Relevant staff will be given appropriate guidance for interaction with customers demonstrating signs of agitation, distress intimidation, aggression or other behaviours that may inhibit customer interaction.

Protection of children and the vulnerable

- We have taken steps to ensure that our lotteries do not attract young people. We have the following procedures in place to prevent under-age players from participating in any lotteries promoted by Children with Cancer UK:
- On all cold data used by our External Lottery Manager, it is requested that all persons under 16 years of age are excluded from the lists before being supplied for the use of our lotteries.
- Where possible we check our database to ensure persons are above the legal age limit before data is supplied for the use of a lottery.
- The minimum age for play is detailed on the front of all entry forms produced.
- Any player who provides dishonest information regarding their age automatically forfeits the right to any prize. This fact is stated in our terms and conditions.
- Any player who is found to be under 16 years of age will have any monies paid in relation to the lottery returned to them.

- Winners aged under 18 years old will receive cash prizes only, no alternative prize will be offered or provided.
- In the event that a request to cease mailing lottery packs is received from a vulnerable person's carer, we remove their details from our mailing database immediately. If the person has been sent a lottery pack as a result of their details being supplied to us through a cold list, we will advise the carer of how to have that person's details removed from the list owner's mailing records too.
- Any portals for remote customers will carry a warning before chances are purchased stating that underage gambling is an offence. Customers will then be required to confirm they are of legal age.
- The age verification system will be reviewed regularly and we will implement all reasonable improvements that may be made as technology advances and information improves.
- All relevant staff will be trained on the use of age verification procedures.
- Website will permit filtering software to restrict the access to relevant pages.

Raffle player queries and complaints procedure

Telephone complaints:

- Initial complaints and queries are dealt with over the telephone by advisers in the telephone room of our External Lottery Manager (the company that manages the lottery on Children with Cancer UK's behalf).
- A telephone log sheet is completed at the time of the call, detailing the caller's contact details, details of the telephone adviser who took the call, the nature of the complaint and how the complaint was resolved.
- The telephone log sheets will be kept on file for three years by our External Lottery Manager.
- If an initial complaint can't be resolved, the complaint is logged by our External Lottery Manager and we are notified immediately of the issue at which point it is taken internally to resolve in accordance with our feedback policy and procedures which you may read here:

<http://www.childrenwithcancer.org.uk/feedback-policy>

- In the event that a telephone or online complaint cannot be resolved by the External Lottery Manager or representatives of Children with Cancer UK, third party arbitration will be provided via the Independent Betting Adjudication Service (IBAS). Independent Betting Adjudication Service, PO Box 62639, London, EC3P 3AS, 020 7347 5883, adjudication@ibas-uk.co.uk.
- All general queries will be logged on the log sheets by the External Lottery Manager and held for future reference.

Written complaints:

- Initial complaints and queries will be responded to within two days of receipt of complaint by the administration team of our External Lottery Manager.
- All complaints are logged on our complaints log sheet, detailing the individual's contact details, details of the administrator who has dealt with the complaint, the nature of the complaint and what steps were taken to resolve the complaint.
- The complaints log sheets and written complaints will be kept on file at our External Lottery Manager for 3 years.
- If the initial complaint can't be resolved by our External Lottery Manager, the complaint is logged and forwarded immediately to Children with Cancer UK staff to be resolved internally in accordance with our feedback policy and procedures.
- In the event that a written complaint cannot be resolved by the External Lottery Manager or representatives of Children with Cancer UK, third party arbitration will be provided via IBAS. Independent Betting Adjudication Service, PO Box 62639, London, EC3P 3AS, 020 7347 5883, adjudication@ibas-uk.co.uk.
- All general queries will be logged on the log sheets by the External Lottery Manager and held for future reference.
- Children with Cancer UK will review all feedback and complaints on an ongoing basis so that we may address them, where possible. All lotteries will be reviewed in full at the end of each activity so any learning and issues can be reviewed and considered for future draws.