

Friends of the Earth - Social Responsibility Policy (Lottery)

Friends of the Earth 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 appropriate processes in place to ensure that these objectives stand up to scrutiny.

In particular, Friends of the Earth wants everyone to enjoy gambling safely and within the three objectives that the Gambling Commission set out in the Gambling Act 2005:

- To keep crime out of gambling
- To ensure that gambling is conducted in a fair and open way and
- To protect children and vulnerable people from being harmed or exploited through gambling.

We are committed to endorsing a responsible attitude towards gambling and we have a responsibility to be aware of the social consequences associated with gambling. We seek to not only comply with all legislation and guidelines provided but also endeavour to put in place as many measures as possible to protect people who are vulnerable to gambling.

This document sets out Friends of the Earth's and the ELM's policies and approach to ensuring that any gambling activities in a socially responsible way. Relevant staff are familiar with this document and will read it upon appointment and every six months thereafter.

1 Preventing gambling from being a source of crime

- The ELM ensures that players are aged 16 or over – dates of birth must be provided
- Players must have their own bank accounts or other age-verified payment methods, which will be utilised to confirm players' age
- Players must be resident in Great Britain and have a valid GB postcode

2 Preventing fraud and criminal activity

- The ELM limits the number of subscriptions sold on one transaction to three
- Prizes are paid back to the account used to pay for the winning subscription or an account verified electronically in line with both FoE and the ELM's Prevention of Money Laundering and Terrorist Funding Policy
- All operating and remote systems adhere to industry standards and regulatory requirements
- 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.
- No player's details will be passed to third parties

3 Ensuring that gambling is conducted in a fair and open way

- Players have access to clear information on matters such as the rules of the lottery and the prizes that are available

- Players are made aware that the lottery is licensed and regulated by the Gambling Commission
- Lottery tickets clearly indicate when FoE is the promoting society for that draw
- Lottery proceeds are held separately from other trading income and are thus segregated in the event of insolvency
- FoE will ensure that the ELM provides players with a full history of their lottery subscription, including payment and winnings history upon receipt of their request
- Both FoE and the ELM have complaints procedures in place, including an option for independent arbitration service with an approved Alternative Dispute Resolution provider
- In conjunction with the ELM, training for staff on licensing objectives and operating responsibilities will take place regularly.

4 Protecting children and other vulnerable persons from the risks of gambling

Friends of the Earth and its ELM:

- Ensure that lottery 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
- Ensure that
 - Gamble Aware information is provided to players with a gambling problem, including providing a click-through link on the ELM and FoE's websites to the begambleaware website
 - Gambling for persons under the age of 16 is illegal. As well as an having in place an age verification process for remote and non-remote gambling (via verification of banking or other age-verified payment processes) the ELM ensures that if a winning individual is unable to prove that they are 16 or over then any winnings will be forfeited
 - Customers who subscribe more than six tickets are actively contacted to discuss subscriptions and reduce these, where appropriate.
 - A self-exclusion policy and procedure is in place to protect vulnerable individuals
 - Access to counselling services is available to staff suffering from gambling addiction

The ELM business model supports Friends of the Earth's commitment to social responsibility.

5 Staff and volunteer training

All staff and volunteers involved in the operation or management of the lottery are made aware of our social responsibility policy in relation to gambling as part of their induction process.

The ELM's customer service team is specially trained to identify and assist vulnerable or at risk players.

The latest developments on responsible gambling practices will be gained through membership of the Lotteries Council; through training provided by the ELM and disseminated through internal communications.

6 Guidelines for Responsible Gambling

Whilst the majority of people do gamble within their means, for some, gambling can become a problem. As part of our commitment to promoting socially responsible gambling, the following guidance is provided for the benefit of individuals who participate in lotteries run by our ELM:

- Gambling should be entertaining and not seen as a way of making money
- Avoid chasing losses
- Only gamble what you can afford to lose
- Keep track of the time and amount you spend gambling
- If you are concerned that gambling may have taken over your own or someone else's life, then please contact a service such as GambleAware, www.gambleaware.co.uk or 0808 8020 133, alternatively a full list of organisations which provide help and advice is available through the Gambling Commission website
- If an individual wants to have a break from gambling, they can use the ELM's self-exclusion option