

## **Friends of the Earth Climate Action Limited - Social Responsibility Policy (Lottery)**

Friends of the Earth Climate Action Limited is committed to ensuring that the lottery is operated in a crime-free, fair, open 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 Climate Action Limited 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 Climate Action Limited'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 requires players to confirm their date of birth, showing they are 16 or over and have a UK bank account
- The ELM requires players to be resident in Great Britain; lottery tickets are dependent on the provision by a player of a valid GB postcode.

### **2 Preventing fraud and criminal activity**

- The ELM limits the number of subscriptions sold on one transaction to three and total amount of subscriptions which a player is allowed to have is limited to six
- Prizes are ordinarily paid to the bank account from which payment is taken. Where bank details have not previously been provided e.g. where subscription is paid by Paypal or Credit Card, all winnings over £3,000 will only be paid to a verified bank account.
- For all winnings over £15,000 the same verification checks will be carried out, regardless of payment type
- The ELM ensures draws are adjudicated by an independent legal representative and completed on a secure, standalone and certified draw engine;
- The ELM offers no cash subscriptions; and has an Anti-Fraud, Corruption and Bribery Policy.
- Customer and player data are monitored and collated to ensure no breaches and statistics are taken to SMT meeting and Operations meeting on a monthly basis as well as quarterly PML Holder meetings.

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

- Players' funds are protected from insolvency, with lottery proceeds held separately from any other trading income and in approved accounts
- Promotion of draws in line with consumer law and follows the Committee on Advertising Practice and ClearCast guidelines, as well as the Industry Group for Responsible Gambling
- Providing players with access to clear information on matters such as the rules of the lottery and the prizes that are available, and providing notification of material changes to players in both electronic and paper format prior to those changes coming into effect, which are submitted to the Gambling Commission 28 days in advance;
- On sign up, details of promoting societies is given, together with where details of future draws and relevant promoting societies can be found
- The ELM's tickets clearly indicate the price of the tickets and that PPL is licensed by the Gambling Commission; and
- A complaints process that is in place to deal with any issues in a clear and procedural way, including an option of referral to Alternative Dispute Resolution.

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

Friends of the Earth Climate Action Limited and its ELM:

- The Gambling Act 2005 s45 (1) states "A person commits an offence if he invites, causes or permits a child or young person to gamble".
- Before an individual can join the lottery, they must confirm to the ELM that they are over 16 years, and provide their date of birth. In addition to the individual confirming they are 16 or over, the ELM's internal controls prevent an account being created if the date of birth provided would mean the individual is under 16.
- The ELM adheres to advertising rules laid out by the Committee of Advertising Practice and Broadcasting Committee of Advertising Practice, and the guidance given by the Industry Group for Responsible Gambling, to prevent the exploitation of children or other vulnerable persons and does not link gambling to youth culture or attempt to attract young persons to gamble. The ELM has contracted with external companies to undertake age checks aimed at ensuring personalised marketing is not sent to anyone under 16. All advertising carries a 16+ logo and our Terms and Conditions provides only people of 16 or over may participate, and that prizes will not be paid to anyone found to be under 16 years old.
- All who sign up with the ELM self-verify their age and the ELM also completes random checks of individuals who sign up to verify their age by conducting monthly dip-sampling of at least 1,000 records. If the ELM becomes aware of a subscription created by an individual who is under the age of 16 years, the account will be stopped and blocked immediately. If the ELM has a suspicion an individual is under 16 we will request valid, photographic ID to verify the individual's age. If unable to verify the individual's age the subscription will be stopped and blocked.
- The ELM has a Vulnerable Persons Policy regarding identifying, interacting and dealing with potentially vulnerable people.

## 5 Underage Gambling

- It is illegal for individuals under the age of 16 to enter into a lottery. If for whatever reason, upon winning any individual is unable to prove, on request, that they are 16 or over then any winnings will be forfeited. The ELM makes it clear in all promotional materials that only those aged 16 or over are eligible to play the lottery. Should anyone under the age of 16 be found to be playing, their account will be closed immediately, and all stakes returned.

## 6 Gambling Limits

The ELM imposes limits on the number of tickets purchased by an individual in a single transaction to three and the total number of playing subscriptions to six. Player data is checked daily to ensure that no one is holding more than 6 tickets. Where it is found that a player has attempted to sign up with more, the excess tickets will be cancelled, and the player contacted, so that only the maximum of 6 tickets are entered into the draw. The ELM business model supports Friends of the Earth Climate Action Limited's commitment to social responsibility.

## 7 Staff training

The ELM ensures that:

- Their commitment to be a socially responsible operator is covered in their staff training process;
- All staff are regularly trained on at least an annual basis and made fully aware of the ELM's social responsibility policies and best practice approaches to identifying and tackling problem gambling; and,
- Their Customer Service team receives additional training in respect of identifying vulnerable or 'at risk' players, which has been enhanced by engaging with the ELM's relevant charities.

## 8 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 then please contact a service such as GambleAware, [www.gambleaware.co.uk](http://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

## **9 Self-Exclusion**

The ELM must close any customer accounts of an individual who has entered a self-exclusion agreement. The minimum initial self-exclusion period offered for non-remote gambling is of a duration of between 6 and 12 months. In terms of remote gambling the minimum self-exclusion period is from 6 months up to 5 years. At the end of the period, the self-exclusion remains in place, unless the customer takes positive action in order to gamble again.

No personalised marketing material will be sent to the individual unless the individual has taken positive action in order to gamble again and has specifically agreed to accept such material. Where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again, the customer is given 24 hours to cool off before being allowed to reactivate their play.

## **10 Access to Player History**

The ELM will provide any player with a full history of their lottery subscription, including complete payment and winnings history upon receipt of a Subject Access Request.

## **11 Provide Information on gambling support organisations.**

The ELM's website provides a clickthrough to the GambleAware and GamCare websites. In the event that a player feels their level of gambling is causing difficulties, the ELM's customer service team will actively refer them to these services.

## **12 Review**

This policy will be reviewed on at least an annual basis