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of people with
blood cancer

ANTHONY NOLAN **RESPONSIBLE GAMBLING**

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**Director/
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Status: Agree on behalf of the Board by the Audit & Finance Committee on 10th September 2019. Reviewed by Caroline Harris, in-house solicitor; and Caroline Crawford, Governance Officer. Agreed by the Lead Safeguarding Director, Terence Lovell, on 2nd August 2019 before approval. In December 2019 a minor change was made to substitute the age of 18 for that in age 16 in section 7, as a matter of policy, for the minimum age of participants. In February 2019 a minor change was made in line with new Gambling Commission regulation to reflect the ban on credit card use for online gambling (7.10).

**Date of next
review:** **September 2022** This policy is dated 10th September 2019 and will be subject to review after three years. Earlier reviews will be made to reflect any changes to the Gambling Commission's general licence conditions and associated Codes of Practice and the regulatory framework within which Anthony Nolan raffles/lotteries operate.

1 INTRODUCTION

- 1.1 The Gambling Act 2005 is designed to control all forms of gambling and provides the legislative framework for operating what is known as a Large Society Lottery. Large Society lotteries are promoted for the benefit of a non-commercial society, i.e. one established and conducted for charitable purposes, such as Anthony Nolan.
- 1.2 In line with the Gambling Act, Anthony Nolan has registered its Large Society Lotteries with the Gambling Commission, which regulates gambling in Great Britain. The Gambling Act places a responsibility on Anthony Nolan, when operating any lotteries or raffles, to promote socially responsible gambling.
- 1.3 The gambling which Anthony Nolan engages in includes raffles, online raffles and a weekly lottery designed to raise funds for the Charity. The Charity recognises that there is a potential reputational risk if lotteries or raffles are not run ethically and

responsibly. Therefore, Anthony Nolan applies all the best practice guidelines as well as the regulatory requirements in place.

- 1.4 The words lottery and raffle are used interchangeably throughout this policy.
- 1.5 This policy is designed to uphold three key licencing objectives as set out by the Gambling Commission's 'Licence conditions and codes of practice' (LCCP):
 - 1.5.1 That crime or disorder should be kept out of gambling;
 - 1.5.2 It should be conducted in a fair and open way;
 - 1.5.3 And children and other vulnerable persons should be protected from harm or exploitation from gambling.

2 USER RESPONSIBILITY AND SCOPE

2.1 Scope

This policy applies to all Trustees, employees and officers of Anthony Nolan, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, Anthony Nolan ("associated persons") within the UK and overseas. Every Trustee, employee and associated person acting for, or on behalf of, Anthony Nolan is responsible for maintaining the highest standards of business conduct.

2.2 Compliance

Any breach of this policy is likely to constitute a serious disciplinary or contractual matter for the individual concerned and will be dealt with under the Anthony Nolan Disciplinary Procedures. The failure to follow this policy may cause damage to the reputation and standing of Anthony Nolan.

2.3 Breaches

Any potential breach of this policy should be reported at the earliest opportunity to the relevant line manager or Engagement Director. Any complaints from members of the public or other external parties, should be responded to positively and effectively within the Anthony Nolan SOP on Complaints, Compliments and Criticisms.

Serious breaches should be considered under the Charity's Serious Incident Reporting Policy and any data protection or data security breaches should be reported immediately to dataprotection@anthonymolan.org.

3 DEFINITIONS

LCCP	Gambling Commission's 'Licence conditions and codes of practice'
SOP	Standard Operating Procedure
Promoting society	Organisation involved in organising and promoting a lottery under the Gambling Act 2005

Key event	Anything that could have a significant impact on the nature or structure of Anthony Nolan's business
Non-remote	Type of licence that allows you to run a non-commercial society lottery, granted by the Gambling Commission
Remote	Ancillary licence to accept payments for participation in a lottery online (or by other remote means)

4 INTERNAL PROCEDURES TO ENSURE COMPLIANCE

Anthony Nolan will ensure it is compliant and will remain up to date regarding gambling regulation, actions and information in ways including but not limited to:

- 4.1 All new projects undertaken involving any element of gambling, will be risk assessed at the planning stage to check that every aspect of the promotion, operation, fulfilment and completion of the activities will comply with this policy and not bring the Charity into disrepute.
- 4.2 The Gambling Commission website will be checked by the Anthony Nolan Individual Giving team on a fortnightly basis and any updates, new guidance or actions taken by the Gambling Commission that might affect Anthony Nolan taken into account for compliance.
- 4.3 Anthony Nolan is a member of the Lotteries Council. The Lotteries Council is an umbrella organisation which promotes the interests of organisations which run lotteries and helps organisations with social responsibility compliance. The Council makes an annual donation to the Responsible Gambling Trust on behalf of its members.
- 4.4 At least one staff team member will attend relevant courses and information days i.e. the Gambling Regulatory Roadshow or Lotteries Council Regional Forums. New guidelines or requirements to be reported to the Individual Giving Manager or

Engagement Director as appropriate to ensure this policy, and any gambling activities operated by the Charity, remain up to date and compliant.

- 4.5 Lottery submissions will be submitted after each lottery through the Gambling Commission e-services portal.
- 4.6 Regulatory returns will be submitted yearly by 11 November through the Gambling Commission e-services portal.
- 4.7 Any key events will be logged with the Gambling Commission within five working days through their e-services portal. A key event is an event that could have a significant impact on the nature or structure of Anthony Nolan's business.

5 ADVERTISING AND MARKETING OF GAMBLING PRODUCTS

- 5.1 All advertising and marketing material produced by Anthony Nolan must comply with the Gambling Act 2005, and all other subsequent statutory orders and amendments, as well as relevant Codes of Practice. The following procedure applies to all printed marketing material, and all virtual electronic media content, including websites and social media content.

5.2 Procedure

All marketing material, pages involving direct sign up, or pages requesting further information, irrespective of the nature of the media, must contain the following statements on, or within one click of, the main body of the material. For these purposes, Anthony Nolan is referred to as a "promoting society":

- 5.2.1 The name of the promoting society (Anthony Nolan) (Licence numbers 000-003586-N-103664-010 (Non-Remote) and 000-003586-R-310429-007 (Remote))
 - 5.2.2 The contact details for Anthony Nolan.
 - 5.2.3 The opportunity to opt out of receiving further post or further raffle communications (see also 5.9 below).
 - 5.2.4 The price of the ticket for the relevant lottery.
 - 5.2.5 The date of the relevant draw.
 - 5.2.6 All exclusions, significant conditions or limitations and eligibility restrictions.
- 5.3 All advertisements must also comply with relevant advertising guidelines. These are the UK Code of Broadcasting Advertising, and the UK Code of Non-broadcast, Advertising, Sales Promotion and Direct Marketing. These codes should be consulted before proceeding with any advertising material. (Note: if Anthony Nolan

staff are unsure how to apply the codes' requirements, free and confidential pre-publication advice is provided by the Committee of Advertising Practice).

- 5.4 Communications must not be exploitative in anyway, including avoiding exploitation due to; addiction, cultural beliefs, emotional difficulties, mental health difficulties, self-esteem (loneliness or attractiveness) issues or financial difficulties.
- 5.5 Anthony Nolan lottery advertising materials must not encourage antisocial or irresponsible behaviour in any way.
- 5.6 Promotional material must not be designed to appeal to persons under 16 years of age.
- 5.7 No images of young people who are, or appear to be, under 25 years of age playing the lottery will be used in any advertising material, unless that material exclusively features the good cause benefits and does not include any explicit encouragement to buy a lottery product.
- 5.8 Prizes that specifically target younger people under 25 years of age such as video games, theme park tickets or certain music concerts will not be offered as incentives or prizes.
- 5.9 Marketing emails will be sent only to those who have given explicit consent to receive such communications.
- 5.10 All email promotions will adhere to data protection legislation, including the General Data Protection Regulations (GDPR), Privacy and Electronic Communications Regulations (PECR) and Gambling Commission standards and include an unsubscribe link for those who wish to change their marketing preferences.

6 INFORMATION FOR PLAYERS

- 6.1 Information for players must be detailed in all Anthony Nolan Raffle and Lottery Rules and Terms of Use. This information ensures that our rules are clear, fair, agreed, public and readily available in advance of any commitment to participate.

Anthony Nolan must ensure that these terms and conditions are readily available by:

- (a) Publishing the Terms and Conditions in the public domain in a clear location on the Anthony Nolan website;
- (b) Including a link to the Terms and Conditions on relevant web pages and promotional material.
- (c) Specifying the location of the Terms and Conditions in entry forms and notifying players of any changes before they come into effect.
- (d) The Terms and Conditions will be supplied in print on request.

6.2 Anthony Nolan will demonstrate that we conduct a fair lottery by:

- (e) Providing players with access to clear and accessible information on matters such as the rules of the lottery.
- (f) Conducting all prize draws fairly through Anthony Nolan's External Lottery Manager, in plain sight of authorised staff and using a Gambling Commission authorised random number generator.
- (g) Specifying on Anthony Nolan's website and, where possible, promotional material the prizes that are available and the chances of winning.
- (h) Publishing the results on Anthony Nolan's website and sending them directly to players on request.
- (i) Operating and publishing a clear complaints procedure.
- (j) Operating in a socially responsible manner, in line with this policy, that ensures that any advertising and promotional material is clear and not misleading.
- (k) Restricting the number of tickets that an individual can purchase. Namely 100, i.e. £100 in total value per raffle and for weekly lottery, we will limit the number of entries to 5 per week.

7 PREVENTING UNDERAGE GAMBLING AND PROTECTING VULNERABLE PERSONS

7.1 For further information please also refer to the Anthony Nolan Fundraising and Vulnerable People Policy. To comply with LCCP Anthony Nolan requires confirmation that all Large Society lottery players are 18 and over. Anthony Nolan will not permit vulnerable people or any person under the age of 18 to participate in a lottery or any other form of gambling.

7.2 Anthony Nolan reserves the right to request proof of identity and age from any person who claims a prize.

7.3 It is a criminal offence to invite or allow a child under 16 to enter a Society Lottery. As a matter of policy (the legal position as stated is age 16) Anthony Nolan, as part of its commitment to responsible gambling, has decided not to allow gambling for those under the age of 18.

7.4 Anthony Nolan has implemented the following procedures to ensure that its lotteries do not attract children under the age of 18:

To avoid targeting young people via marketing material:

7.4.1 Any personal data used for lottery mailings will be screened as far as possible to exclude persons under the age of 18.

7.4.2 Promotions will not be run on any media channels specifically targeted at young people.

- 7.5 The age of players will be verified by a combination of the following:
- 7.5.1 Credit cards: Credit cards are issued only to over 18s. Therefore, Anthony Nolan lottery players using this method may be verified by the External Lottery Manager to be 18 or over.
 - 7.5.2 Anthony Nolan lottery winners: All winners will be age verified by Anthony Nolan against database records and their age qualification confirmed by telephone in advance of prizes being awarded.
- 7.6 The methodology adopted in order to establish whether or not a potential or actual player is over 18 years old will be reviewed on an annual basis, and all reasonable improvements that may become available as technology advances and as information improves will be implemented.
- 7.7 If a person enters the Anthony Nolan lottery stating that they are over the age of 18 years and subsequently it is found that they are less than 18 years of age, they will be notified of their disqualification from the lottery by phone or post, have any money paid in relation to the lottery returned to them and, where relevant, will automatically forfeit the right to any prize.
- 7.8 To ensure that the law has been explicitly outlined and that players confirm their age, all Anthony Nolan lottery registration forms are required to carry the explicit age restriction warning. If entering online, a tickbox must be filled in by the player confirming that they are over the age of 18.
- 7.9 Anthony Nolan will provide signposts to BeGambleAware for support by including the text: "If you feel you have a problem with gambling, please visit BeGambleAware, www.begambleaware.org, or call the National Gambling Helpline on 0808 8020 133, lines open 8.00am to midnight".
- 7.10 Anthony Nolan will only accept debit card payments for raffle tickets purchased through the website or over the phone in accordance with the Gambling Commission credit card ban which came into place April 2020. Players are still able to enter the raffle using a credit card, debit card or cheque, by post.

8 SELF-EXCLUSION

Anthony Nolan has put in place the following procedures to encourage people to gamble responsibly and to seek help should gambling become a problem:

- 8.1 Anthony Nolan will include the contact details of support organisations on its lottery website and, where possible, any promotional material. Further information about problem gambling is set out below, and in our Terms and Conditions.

"The Anthony Nolan [X Raffle/X Lottery] is intended to be a fun way to support Anthony Nolan and the vital work we do. Are you gambling more than you really want to? If you feel you have a problem with gambling please visit BeGambleAware's website for help and advice, or contact the National Gambling Freephone Helpline between 8 am and midnight on 0808 8020 133. To exclude yourself from our database for future raffle mailings please contact: support@anthonymolan.org"

And printed on our raffle tickets:

“If you’d prefer not to receive Anthony Nolan raffle tickets in future, please let us know by calling 020 7424 6626.”

- 8.2 If self-exclusion is requested, we will exclude the supporter from future raffle communications until such time that the supporter requests to receive them again.
- 8.3 If Anthony Nolan is made aware of an application to participate in the lottery from a person who has previously excluded themselves from participating in gambling, or is a suspected problem gambler, Anthony Nolan will alert the External Lottery Manager, in order to reject the application and remove any current entries. The prospective player will be advised in writing of the reasons for the rejection and referred to BeGambleAware. The player will be advised that their details will be logged in the Charity’s database for the purposes of possible exclusion from future participation in the lottery.
- 8.4 Communication between Anthony Nolan and any player who self-excludes from gambling will be conducted as follows:
 - 8.4.1 All self-excluding players or suspect problem gamblers will be registered as such on Anthony Nolan’s fundraising database system.
 - 8.4.2 Anthony Nolan will ensure that any person who has asked to be suppressed from lottery communications is not contacted by Anthony Nolan for these purposes. All self-excluders will be removed from any gambling related marketing databases within two working days of Anthony Nolan receiving the completed self-exclusion notification.
 - 8.4.3 Any membership held by the self-excluder in the lottery scheme will be cancelled immediately, in such a way as to ensure that no further future credit is spent.
 - 8.4.4 Any advance payments applicable to the lottery scheme will be refunded by Anthony Nolan at the earliest opportunity.
 - 8.4.5 All communication between staff and self-excluders or suspected problem gamblers will be recorded on the Anthony Nolan fundraising database and monitored and approved by the Supporter Services and Database Marketing Manager.

9 TIPS FROM BEGAMBLE AWARE WEBSITE

- 9.1 Anthony Nolan endorses the following tips from BeGambleAware.

Most people gamble for fun and enjoyment. However, some people think of gambling as a way to make money, spend more than they can afford, or use gambling to distract themselves from everyday problems. Following these tips can help you to gamble more safely.

- Don't think of gambling as a way to make money.
- Only gamble with money you can afford to lose.
- Set a money limit in advance.

- Don't gamble when you're depressed or upset.
- Don't drink or use drugs when gambling.

For more information about lotteries/raffles visit the Gambling Commission website gamblingcommission.gov.uk

Please gamble responsibly.

BeGambleAware.org[®]



10 RELATED POLICIES

The following related policies also apply and are available on request:

- Safeguarding Policy and Procedures
- Safeguarding Code of Conduct
- Fundraising and Vulnerable People Policy
- Whistleblowing Policy
- Anti-Bribery Policy
- Serious Incident Reporting Policy
- Data Protection Policy
- Privacy Policy
- Complaints, Comments and Criticisms SOP