



## **Social Responsibility Policy**

The Trust promotes its own society lottery for the sole purpose of raising funds for the Trust in order to support charities. The Lottery is managed on behalf of the Trust by its External Lottery Manager; Postcode Lottery Limited (marketed as People's Postcode Lottery).

The Trust 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 its ELM to have the appropriate processes in place to ensure that the objects outlined in The Gambling Act 2005 (listed below) and referred to in this policy, stand up to scrutiny.

The Gambling Commission regulates gambling to ensure that:

- it is crime free;
- it is fair and open; and,
- children and vulnerable people are protected.

This document sets out The Trust's approach to ensuring we approach any gambling activities in a socially responsible way.

### **1. Preventing gambling from being a source of crime and disorder**

When a player joins the Lottery, we will check that:

- The individual is aged 16 or over
  - players need to provide their date of birth, need to have a bank account or other age-verified payment methods
- The individual is resident in Great Britain.
  - lottery tickets are dependent on the provision by a player of their valid GB postcode.

To prevent fraud and criminal activity, we will:

- pay prizes only to paying playing accounts;
- ensures draws are adjudicated by an independent legal representative and completed on a secure, standalone and certified draw engine;
- offers no cash subscriptions; and,
- reports suspicious activities to the Gambling Commission and to the Police, under the Proceeds of Crime Act 2002.

### **2. Ensuring that gambling is conducted in a fair and open way**

*Postcode Community Trust is a registered Scottish Charity (SC044772) and is a company limited by guarantee (SC472798) It is regulated by the gambling commission. Players must be 16+*

We do this by ensuring:

- players' funds are protected from insolvency, with lottery proceeds held separately from any other trading income and in approved accounts;
- promotion is in line with consumer law and follows the Committee on Advertising Practice and ClearCast guidelines;
- players have access to clear information on matters such as the rules of the lottery and the prizes that are available, and notification of changes are submitted to the Gambling Commission 28 days in advance;
- tickets are provided clearly indicating the promoting society, details of the society, dates of the draw, price of the tickets and licensed by the Gambling Commission;
- A customer care process that creates an alert when a player subscribes with more than six tickets.
- A complaints process that is in place to deal with any issues in a clear and procedural way including Alternative Dispute Resolution.

### **3. Protecting children and other vulnerable persons from being harmed or exploited by gambling.**

- People's Postcode Lottery works with regulated third parties that have a process for age-verification
- People's Postcode Lottery adheres to advertisement rules laid out by the Committee of Advertising Practice, summarised below:
  - To not encourage gambling that may lead to socially irresponsible acts or could lead to financial, social or emotional harm.
  - To not exploit children or other vulnerable persons.
  - To not suggest gambling can solve financial problems or debts.
  - To not suggest gambling can increase attractiveness or sexual success.
  - To not link gambling to youth culture or attempt to attract young persons to gamble.

#### **We will endeavor to address the following issues:**

- **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 that they are 16 or over then any winnings will be forfeited.
- **Gambling Limits.** People's Postcode Lottery imposes limits on the number of tickets purchased by an individual in a single transaction to three. For those subscribing to six or more tickets we will actively contact these individuals to confirm their subscription level.
- **Self-Exclusion.** People's Postcode Lottery must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. The self-exclusion period is a minimum of six months and gives customers the option of extending this to a total of at least five years. At the end of the period (and at least six months later), the self-exclusion remains in place, unless the customer takes positive action in order to gamble again. No marketing material should be sent to the individual unless the individual has taken positive action in order to gamble again, and has 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 one day to cool off before being allowed access to gambling facilities.
- **Access to Player History.** People's Postcode Lottery will provide any player with a full history of their Lottery subscription, including complete payment and winnings history upon request.

- Provide Information on gambling support organisations. On our website we provide a click-through logo to the Gamble Aware website. In the event that a player feels their level of gambling is causing difficulties, our in-house customer care team will actively refer them to these services.

#### **4. General Points about PPL**

In their operations, the Lottery confirms that:

- The Lottery is regulated by the Gambling Commission under licences 829-N-102511-007 and 829-R-102513-008.
- Postcode Lottery Ltd has an 'External Lottery Manager' licence (also known as an ELM) to promote lotteries on behalf of charities. The individual charities have operating licences and the individual charities are accountable for all the proceeds
- All staff are trained and made fully aware of these social responsibility policies.

#### **Data Protection**

The Trust's ELM will manage all details relating to players, and their bank account securely and in accordance to the requirements of the Data Protection Act. No player's details will be ever passed to third parties.

#### **Legal requirements**

The Trust will adhere to all relevant legal requirements in order to promote its Lottery and our ELM has significant experience in operating responsible processes within the legal framework required for the business.