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Related Procedural Documents	Self-Exclusion Form Self-exclusion Process Compliance LCCP Social Responsibility Checklist
Other related policies	The Financial Crimes Act Policy
Applicable to	Individual Giving Prize Led Fundraising Digital Marketing Social Media Team Supporter Care
Version	v1
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Introduction

Guy's & St Thomas' Charity is dedicated to supporting the Guy's and St Thomas' NHS Foundation Trust. Caring for patients and families, supporting them with developing new treatments, backing world-leading research and shaping innovative approaches. To fund our services, we undertake a range of fundraising activities, including prize-led fundraising in the form of our (name of Lottery and rollover prize draw *if applicable*).

This policy outlines our commitment to ensuring that our prize-led fundraising practices are fair and open and that information about how to gamble responsibly and how to access information and help in relation to problem gambling is available to everyone.

All staff and contracted third-party staff, involved with or linked to our lottery activities are familiar with this policy and receive Responsible Gambling Training on appointment and at least every 12 months thereafter.

Scope:

- The Gambling Act (2005) and the Gambling Commission Licence Conditions and Codes of Practice
- Fair and Open Practices – Information for Players
- Protection of Children and Vulnerable Persons
- Responsible Gambling:
 - o Keeping your gambling under control
 - o Identify Problem Gambling
 - o More information and help
- Self-Exclusion
- Advertising and marketing of gambling products

- Preventing Gambling from Being a Source of Crime and Disorder, Being Associated with Crime and Disorder, or Being Used to Support Crime

The Gambling Act (2005) and the Gambling Commission Licence Conditions and Codes of Practice

Guy's & St Thomas' Charity operates our gambling products in accordance with the Gambling Commission's Licence Conditions and Codes of Practice (LCCP).

<https://www.gamblingcommission.gov.uk/>

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 sets out the following licensing objectives:

- Preventing gambling from being a source of crime and disorder, being associated with crime and disorder, or being used to support crime;
- Ensuring that gambling is conducted in a fair and open way;
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

Fair and Open Practices – Information for Players

We are committed to conducting our weekly lottery in a fair and open manner, ensuring that:

1. all Terms and Conditions for the running of our licensed activities are fair and transparent and are readily available to all participants prior to committing to a purchase.
2. Terms and Conditions are published on the Guy's & St Thomas' Charity website,
3. Draw information: Woods Valldata (The Supplier) shall manage the draw in accordance with the Gambling Commission's Licensing Conditions and Codes of Practice (LCCP).
 - i. The Supplier shall use its Random Number Generator software to provide compliant weekly draws, ensuring fair entry from all sources.
 - ii. For the top tier insured prizes, the Supplier shall use its Random Number Generator software to select 6 numbers from 1 to 49.
 - iii. The Supplier shall check the database for any 5 or 6 number matches, in any order, where an associated payment record is held.
 - iv. For the second tier guaranteed prizes, the Supplier shall use its Random Number Generator software to select the chances, excluding any top tier winning chances'
4. Winning numbers will be published on our website
5. Fair distribution of prizes to prize winners by cheque.
6. Players have access to clear information on matters such as the rules of the game, the prizes that are available, the odds of winning, and the way in which prizes are allocated.
7. Upon request from any player, we will provide a full history of their lottery membership, including complete payment and winnings history.

Protection of Children and Vulnerable Persons

1. In order to prevent access to our lottery product by Children and Young Persons, Guy's & St Thomas' Charity will not permit lottery ticket sales to anyone under the age of 18. We will also ensure that:
 - 1.1. Potential customers are warned that underage gambling is an offense

- 1.2. Potential customers affirm that they are of legal age by providing a date of birth at point of entry.
 - 1.3. Relevant staff are properly trained in use of their age verification processes
 - 1.4. All licensed products' marketing and promotional activity will advertise the minimum age for participation. Under the CAP code requirements for marketing of society lotteries, Guy's and St Thomas Charity will not include 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. Any inclusion of young people or people appearing to be under the age of 25 will only be included if these images exclusively feature the good cause benefits and does not include any explicit encouragement to buy a lottery product.
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2. Vulnerable persons
 - 2.1. In line with Guy's and St Thomas' Foundation's Potentially Vulnerable Supporters Policy, we will politely refuse to accept further participation from people who have been discovered to be vulnerable or are suspected of being vulnerable.
 - 2.2. Relevant staff will be trained to recognise vulnerable or potentially vulnerable people in line with the Fundraising Regulator Code of Fundraising Practice and Mental Capacity Act 2005.

Responsible Gambling Guidance

Guy's & St Thomas' Charity hope that playing our lottery product is a positive experience for our supporters.

The majority of people do gamble responsibly and gambling in moderation for many can be a generally amiable experience. However, for some gambling can become a problem and therefore we have added some tips on how to keep your gambling under control.

- Remember that you are taking part for fun and not as a means of investing your money
- Set strict limits on how much time and money you're going to spend, before playing
- Quit while you're ahead
- Only gamble with money that you can afford to lose
- Not spending more money on gambling in the hope that you will win back any money that you've already lost
- Keep up other interests and hobbies and not let gambling take over your life
- Not gambling in order to escape from stress or boredom.

How to Identify Problem Gambling

If you are concerned that gambling may become a problem for you or someone you care about, the following questions can help you to identify problem gambling:

- Have you ever lied to cover up the amount of money or time you have spent gambling?
- Do you stay away from work or social engagements to gamble?
- Do you gamble to escape from any aspect of your life?
- When gambling and you run out of or lose money, do you feel lost and in despair and need to gamble again in order to win back any losses as soon as possible?
- Do you gamble until your last penny is gone?

- Have others ever criticised your gambling?
- Do you notice that you lost interest in your family, friends or hobbies?
- Do arguments, frustrations or disappointments make you want to gamble?
- Is your mental health being affected because of your gambling?

More information and help

If the answer is 'yes' to one or more of these questions, you/they may have a gambling problem and we advise that you/they speak to someone about it. You/they should contact the National Gambling confidential helpline on 0808 8020 133 or visit the website <https://www.begambleaware.org/> for further information.

Self-Exclusion

Guy's & St Thomas' Charity operates a self-exclusion policy available to any person who, for whatever reason, wishes to be excluded from our lottery product and related marketing. Details about self-exclusion and how to go about excluding oneself will always be displayed on our lottery website.

When you self-exclude, we will exclude you from all gambling communications for a minimum of six months and until you tell us that you are ready to receive information from us. We will opt you out of all gambling related marketing consent on our database and you will not receive any gambling related marketing communications from us until you decide to opt back in to these communications.

If you opt for self-exclusion, we will refund all the unused funds in your Guy's & St Thomas' Charity Lottery account. Your account will be closed. Where self-exclusion has expired, we won't contact you to ask if you'd like to be reinstated, it will be up to you to inform us. There is no limit as to how many times you wish to be self-excluded should you have chosen to reinstate your lottery opt-in after the 6 month mandatory exclusion period.

Should you wish to self-exclude, you can do this by filling in our self-exclusion form displayed on our lottery website (link to self-exclusion form) or by calling supporter care (tel number included)

Please note, we are unable to self-exclude an individual at the request of another person, unless they can prove that they hold power of attorney.

Advertising and marketing of gambling products

All advertising and marketing of gambling products by Guy's & St Thomas' Charity complies with the Gambling Commission LCCP Ordinary Code, and with the advertising codes of practice issued by the Advertising Standards Authority (ASA) Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable.

- Promotional material will not be designed to appeal to persons under the age of 18 years of age.
- 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. Any inclusion of young people or people appearing to be under the age of 25 will only be included if these exclusively feature the good cause benefits and does not include any explicit encouragement to buy a lottery product.
- Guy's & St Thomas' Charity will ensure that all significant lottery details are provided transparently and prominently to consumers to enable them to make an informed choice prior to participating in a lottery. This must include but is not restricted to details of how proceeds are used, the likelihood of winning a prize and how prizes are allocated.

- Marketing communications will not portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm.

Preventing Gambling from Being a Source of Crime and Disorder, Being Associated with Crime and Disorder, or Being Used to Support Crime

When an individual joins the lottery, (lottery owner here) will endeavour to ensure that:

- We do not suspect any individual is using the lottery for the purposes of money laundering in any way, in line with the Proceeds of Crime Act and our internal policies ([link here](#)). Any suspected money laundering activities will be reported to the appropriate authorities.
- We also retain the right to cancel any membership should we suspect criminal activity.
- In order to minimise the risk the lottery being used in relation to crime and disorder, cash will not be accepted for the purchase of lottery tickets.
- We limit the maximum number of entries to £10 per person per week.
- We record any incidents for future reference.