

Social Responsibility in Gambling Policy

1 Our Commitment Towards Responsible Gambling

The County Air Ambulance Trust Limited (Herein known as The Charity) operates the HELP Lottery and Superdraw with the sole purpose of raising funds to provide financial support to help fund life-saving helipads at Major Trauma Centres and key A&E Hospitals in England and Scotland.

The Charity is committed to ensuring that the lottery is operated in a secure, fair and socially responsible way and to endorsing responsible gambling amongst its members.

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on the following three licensing objectives:

1.1 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 HELP Lottery we will check that:

- The individual is aged 18 or over.
- The individual is resident in the UK.

The Charity will also:

- Retain the right to terminate any player's participation in the lottery should we suspect criminal activity.
- Not accept cash.
- Allow any individual to purchase up to 20 chances per week.
- Ensure all lottery related computers and software is password protected and accessible only by authorised members of staff.
- Ensure Charity staff are trained to detect and also how to report potential money laundering threats. Staff are all issued with

Proceeds of Crime Act 2002 leaflet and examples of money laundering.

- **Adopt a strict and thorough reporting procedure if a member of staff and or another operator is found to be in any way operating in an illegal or suspicious manner.**

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

The Charity will ensure that:

- **Players have access to clear information on matters such as the rules of the HELP Lottery, the prizes that are available and the chances of winning are equal to all participants.**
- **The rules are fair.**
- **Any advertising and promotional material is clear and not misleading.**
- **The results are made public.**
- **We utilise tried and tested lottery software to administer the HELP Lottery that uses a computer operated random number generator in line with Gambling Commission regulations.**

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

This part of the document sets out the approach that The Charity adopts to ensure we approach any gambling activities in a socially responsible way. We will use our best endeavours to address the following issues:

3.1 Age verification Policy

It is an offence for persons under the age of 18 to play the HELP Lottery. If for whatever reason, upon winning a person is unable to prove that they are 18 or over then any winnings will be forfeited.

The Charity will ensure that staff are trained to be aware of their responsibilities for preventing underage gambling. To avoid persons who are or who appear to be aged under 18 the Charity will, where appropriate, carry out checks to verify this requirement, if necessary including seeking confirmation from relevant agencies that can provide such information.

Where HELP lottery tickets are sold face to face, if it appears that the potential customer might be underage, our staff ask for proof

of identity, establishing that the person is aged 18 and over before selling the lottery ticket to them.

Examples of acceptable identification for age verification purposes include:

- Passport
- Driving Licence
- Official Student Card

Should a prize winner be found to be under the age of 18 years we will refund their money and withhold the prize, additionally the Charity reserves the right to reclaim any prizes issued in error.

3.2 Protecting vulnerable persons

The Charity will ensure its staff are trained to detect vulnerability in potential customers and politely decline offers of support from such individuals. People particularly at risk include the elderly, mentally disabled and those under the influence of drugs or alcohol.

To ensure that our HELP lottery does not appeal to children or young people, careful attention is paid to the design and content of our marketing material.

3.3 Promotion of social responsibility in gambling:

The majority of people do gamble responsibly for enjoyment and in moderation, but it may help you to keep your gambling under control by:

- Remembering that you are taking part for fun and not as a means of investing your money;
- Setting strict limits on how much money you're going to spend, before playing;
- Only gambling 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;
- Not let gambling take over your life;
- Not gambling in order to escape from stress or boredom.

The Charity will take the following steps to ensure the promotion of social responsibility in gambling:

- Each chance in the HELP Lottery cost £1 and only all participants who have paid the subscription before the commencement of the draw will be eligible and have equal chance to win a prize.
- We may impose limits on the number of entries into the HELP Lottery that can be purchased by an individual to £20 per week.
- If our staff have a concern that a customer's behaviour (signified for example by a sharp increase in their expenditure on lottery tickets) may indicate problem gambling, they will be trained to report the matter to the responsible person or other suitably appointed person for the HELP lottery.
- The customer will be called to discuss the matter, including providing information that help is available for problem gamblers from gambling support organisations with contact details or links on our website or via other appropriate media to Game Care, the Responsible Gambling Trust (RGT) and other relevant/appropriate organisations offering gambling support.
- In severe cases, consideration may be given to barring the customer from participating in the HELP Lottery.
- We will provide any player with a full history of their membership, including complete payment and winnings history upon request.
- On request, we will close any player's lottery membership for a minimum period of six months during which time the membership cannot be reinstated. During this period we will also try to ensure that the individual does not attempt to open a new membership. (See 4.2 below)

4 Keeping Your Gambling Under Control

4.1 For some people gambling can become a problem. If you are concerned about the amount you are gambling and feel like it is taking over your life, then asking yourself the following questions may help you assess whether or not gambling is becoming a problem:

- Have others ever criticised your gambling?
- Have you lied to cover up the amount you have gambled or the time spent doing it?
- Do arguments, frustrations or disappointments make you want to gamble?
- Do you gamble alone for long periods?
- Do you stay away from work or college to gamble?
- Do you gamble to escape from boring or unhappy life?
- Are you reluctant to spend 'gambling money' on anything else?

- Have you lost interest in your family, friends or pastimes due to gambling?
- After losing, do you feel you must try to win back your losses as soon as possible?
- When gambling and you run out of money, do you feel lost, in despair and need to gamble again as soon as possible?
- Do you gamble until your last penny is gone?
- Have you lied, stolen or borrowed just to get money to gamble or to pay gambling debts?
- Do you feel depressed or even suicidal because of your gambling?
- If 'yes' is the answer to some of these questions, then it is likely that a gambling problem exists?
- You may wish to consider whether a relative or friend might have a gambling problem?

4.2 Self Exclusion

The Charity has procedures in place allowing an individual to self-exclude for a length of time and will take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion request form from participating in gambling with any lottery administered by The Charity. A self-exclusion form is available on our website or from the Charity on request.

- The individual's lottery account will be closed within two days of having received the completed self-exclusion form. Any balances outstanding on the account will be refunded. Where an individual has paid by cheque, the amount from the last draw they were entered into, to the end date of their subscription will be refunded by cheque within 10 working days. Where an individual pays by Direct Debit we will cancel the Direct Debit instruction and refund any unused credit on the ticket(s).
- During the period of self-exclusion, they will not be entered into The Charity lottery draw, even if the individual has failed to cancel their direct debit.
- During the period of self-exclusion we will take all reasonable steps to ensure that the individual does not try and play any lottery administered by The Charity lottery and to prevent any marketing material being sent to them.
- The self-exclusion request will be entered onto the lottery software system and will block any further requests to partake in gambling. The individual will be provided information on

gambling support agencies. The main one being GameCare (see 4.3 below)

- After the self-exclusion period ends, if the individual wishes to recommence participating in
- any of the lotteries promoted by us, they must request in writing that they wish to be removed from the self-exclusion register. Once we receive this letter the individual will be given one day to cool off before being given the opportunity to recommence participation in the lottery.
- The individual must be the one to take positive action to gamble again and no contact will be made by the charity until contact has been made by that individual.

4.3 How to get more information and help about problem gambling.

For helpful advice you can visit the website at www.gamecare.org.uk or www.begameaware.org or for friendly and helpful advice from trained counsellors, you can speak to an advisor on the National Gambling Helpline - Freephone 0808 8020 133. The helpline operates between 8.00am and midnight, 7 days a week, 365 days a year; and calls outside of these hours will be taken by a recorded message service.

Sometimes just telling someone about your problem can be a relief – and it is the first step towards dealing with your problem.

Through our membership to the Lotteries Council, we regularly contribute to the Responsible Gambling Trust to fund research and public education on the risks of gambling and how to gamble safely.

5

Protection of member's funds

All membership funds intended for use in future lottery subscriptions will be held in a separate bank account relating to The Charity lottery and will be completely separate from the Charity's income.

We are required by our licence to inform members about what happens to funds which we hold on account for them, and the extent to which funds are protected in the event of insolvency.

The funds are held in an account separate from the Charity. This means that steps have been taken to protect member's funds but there is no absolute guarantee that all funds will be repaid. This meets the Gambling Commission's requirements for segregation of members' funds at the level: medium protection.

We operate a strict no "cash policy" to prevent the risk of crimes such as money laundering, to avoid the giving of illicit credit and to provide assurances that gambling activities are being conducted fairly.

6

Ensuring Marketing Compliance

All advertising and marketing material must comply with the Gambling Act 2005. This applies to all printed marketing material, and all electronic media content, including internet websites and social media content.

All marketing material, irrespective of the nature of the media, must contain the following;

- **The name of the promoting society (The Charity)**
- **The price of the ticket for the relevant lottery**
- **The name and address of the person responsible for the promotion of The Charity lottery**
- **The date of the relevant draw**
- **The fact that The Charity T/A as HELP Appeal is licensed by the Gambling Commission**
- **The Gambling Commission website
www.gamblingcommission.gov.uk**

In the case of electronic media, it must be possible for the purchaser of the ticket to retain or print a document that contains all of the above.

It is an offence to sell tickets to under 18's, The Charity lottery must ensure that sale of remote tickets does not inadvertently target or recruit lottery players using this media.

In addition, it is vital that the player must have access to relevant information, on each individual webpage, e-mail or other electronic communication. It is also further advisable in the interests of transparency that this information appears on all subsequent lottery related web pages.

7 Governance

- 7.1 The HELP Lottery is a draw operated and promoted by:
The County Air Ambulance Trust
(The Charity)
registered address: PO BOX 999,
Green Lane,
Walsall,
WS2 7YX,
Telephone: 0800 389 8999
as a society lottery under the Gambling Act 2005.**

- 7.2 The Charity is licensed and regulated in GB by the Gambling Commission under Account Number 32559:**

The Operating Licence numbers are:

**Non – remote: 000-032559-N-314608-007
Ancillary remote: 000-032559-A-316991-005**

Responsible Person: Robert Bertram

- 7.3 The County Air Ambulance Trust is the sole beneficiary of the HELP Lottery and will receive all of the proceeds after deduction of the expenses of running the lottery, including the cost of the prizes. Registered Charity Numbers:
England and Wales (1057063) and Scotland (SCO45963)**