

Tenovus Cancer Care Gambling Policy

1. Introduction

As part of a wide range of fundraising activities, Tenovus Cancer Care operates a weekly subscription lottery, managed by make a smile lottery, which is promoted and operated by St Helena Hospice (Gambling Commission licence number 4685), as well as non-subscription lotteries such as Christmas raffles via retail outlets and community groups.

In order to provide these activities, Tenovus Cancer Care is registered with Gambling Commission under the 2005 Gambling Act, Account ID 46168.

www.gamblingcommission.gov.uk

We want everyone to enjoy gambling safely and within the three objectives that the Gambling Commission set out in the Gambling Act 2005:

- 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 from gambling

We're committed to endorsing a responsible attitude towards gambling and we have a responsibility as a provider of gambling services 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.

Tenovus Cancer Care also operates its lotteries in accordance with the Gambling Commissions Licence Conditions and Code of Practice (LCCP).

2. Policy

2.1. Crime and Disorder

We are committed to ensuring that gambling is not used as a source of crime or disorder, associated with crime or disorder, or used in any way to support crime.

To minimise the risk of our gambling services being used for money laundering and other criminal behaviour, all fundraising activities involving gambling at Tenovus Cancer Care are limited to £1 entry weekly lotteries and raffles.

In accordance with the Proceeds of Crime Act 2002 (POCA), all employees, volunteers and third party fundraisers must report any known or suspected use of the proceeds of crime in gambling to their Line manager and will be passed on to the National Crime Agency (NCA) by our Director of Finance.

Validation checks and procedures for the detection and prevention of suspicious activity will be implemented across all areas and will include, but will not be restricted to:

- Supporters who wish to take out more than 10 lines in a weekly lottery draw
- Supporters requesting more than 50 tickets in any single raffle scheme
- Suspected problem gamblers, as identified by multiple requests for tickets and / or purchasing tickets in multiple locations

- Supporters suspected of being under the influence of alcohol or drugs
- Supporters making payment with suspected counterfeit money

The validation checks will be carried out at point of sale / ticket request, and transactional data will be analysed regularly in order to identify if a person has exceeded the set limits as outlined above. Any suspected suspicious activity or potential offences as determined by the Gambling Act will be reported to the Gambling Commission.

Further measures in place to prevent money laundering and other criminal activity include:

- For subscription based weekly lotteries, materials will be designed to secure up to 2 entries per person, at £1 per week and payment will be restricted to direct debit for door to door sellers, and direct debit / cheque payments for players recruited through other remote or non-remote means (telephone, mail, leaflet, online)
- Tenovus Cancer Care will maintain a record of all tickets distributed for non-subscription based lotteries (e.g Christmas Raffle) as well as all tickets not returned in order to prevent fraudulent claims and / or collusion between ticket sellers and customers

We will not accept the purchase of raffle tickets on behalf of another person, or where we are able to identify that money has been borrowed in order to pay for the tickets (i.e. customer lending to another customer in a shop).

All cash will be handled safely and stored securely in line with existing policies in place for all staff and volunteers.

Details of any customer suspected of cheating in any way will be passed on to the lotteries team at Tenovus Cancer Care in order to follow up and respond appropriately in line with current complaints and supporter care procedures.

All players must have a declared permanent address within an accepted territory: UK mainland, Scottish Islands and Isle of Wight, which will be determined by their sign-up form (weekly subscription lottery) or their ticket stubs (non-subscription lottery). Any player found to have no declared permanent UK residence will be contacted and informed that their subscription will be cancelled.

Tenovus Cancer Care employ a number of third party suppliers to manage, promote and fulfil lottery activities. Prior to commencing activities with any such suppliers, we undertake several due diligence checks in order to ensure that we're not entering into a scheme or gambling activity that might breach the law, and to refuse to contract with any organisations suspected of being associated with criminal activities.

These checks will include, but are not restricted to:

- Obtaining testimonials and references from other clients and similar organisations
- Reviewing contracts governing behaviour and operating processes
- Reviewing training plans for all staff in relation to the requirements of the Proceeds of Crime Act, responsible gambling and the promotion of lotteries
- Checking that premises and all associated processes and procedures are secure, with restricted access to ensure data and financial security
- Ensuring that technologies used and all associated processes and procedures are

secure, with restricted access to ensure data security

Tenovus Cancer Care will also ensure that appropriate disciplinary procedures are in place, both internally and with all third party suppliers for any member of staff found to be operating in an illegal manner. Any such instances will also be reported to the Gambling Commission as soon as practicably possible.

2.2. Fair and Open Draws

Tenovus Cancer Care is committed to ensuring that all gambling activities are carried out in a fair and open way, and that we ensure sufficient resources are allocated to cover all transactions and financial obligations.

Ensuring financial obligations can be met

- Non subscription lotteries offer a mixture of donated prizes and low level cash prizes, and in some cases higher value items such as a car or holiday Resources are allocated during the budgeting process each year to cover all costs, including prize funds associated with such raffles, ensuring all financial obligations can be met.
- Our weekly subscription lottery is managed by make a smile who are responsible for administrative communication with players, managing the collection of payments, holding the weekly draw, and the distribution and payment of all prizes. Administrative fees and prize fund are taken as a percentage of ticket sales, and the remainder of the proceeds are then paid to us on a monthly basis.

Availability of Information

- Rules for our weekly subscription lottery are provided during sign-up, within a standard welcome letter, on the make a smile website and the Tenovus Cancer Care website. Supporters can also contact make a smile lottery on 0300 303 4500 or Tenovus Cancer Care on 029 2076 8850 should they have any questions or require further information.
- The winning numbers will be published on make a smile website weekly following each weekly draw, and details of how to find out about winning raffle tickets will be made available on the Tenovus Cancer Care website.
- For non-subscription raffles, rules for the draw are listed on raffle tickets and explained in any mailings we send out with raffle tickets included. The full written rules are also available on request and supporters can also speak to us directly should they have any questions.

Fairness of Draws

- All draws are drawn in clear sight of staff, they are conducted at random using either a blind draw or electronic random number generator and the winners will be contacted by post, email or telephone no later than two weeks after the draw date.

Changes to Rules

- In the event that there are any changes to the rules of our weekly subscription lottery, players will be notified by make a smile prior to them coming into effect. All associated materials will be updated both on and offline
- Rules are unlikely to change during the sale of non-subscription raffles, however in the event that a change is necessary, all players will be contacted and offered a refund, and materials will be updated accordingly prior to any further sales taking place

Complaints

- Any complaints regarding the draw can be made directly to Tenovus Cancer Care by contacting the fundraising team on 029 2076 8850 or by email at post@tenovuscancercare.org.uk
- We will respond to initial complaints and queries within 48 hours of receipt of the complaint. All complaints are recorded and reported annually in line with the fundraising standards board requirements and the outcome of any complaint is also recorded for future reference
- A copy of our complaints procedure is available on request
- As a registered member of the ADR Group, we will also refer complainants to them should we be unable to resolve any complaints or disputes

Marketing

- All promotional activity relating to any lotteries offered by Tenovus Cancer Care will also be conducted in line with the Gambling Commission's Licence Conditions and Codes of Practice as well as the Fundraising Regulator Code of Practice.

2.3. Protection of Children and Vulnerable People

Tenovus Cancer Care gambling activities are only open to those over the age of 16 and this is clearly stated on our web site and promotional materials. In order to prevent underage people entering our lotteries:

- We do not sell tickets to any person under the age of 16 as a safeguard and carry out checks to ensure all those on our raffle and lottery mailing list are over 16.
- We train staff and volunteers selling tickets on this and if in doubt request identification before selling tickets
- We ensure that advertising and promotional activity is not targeted at, or of appeal to minors
- We remove anyone under the age of 16 found to have entered any game from the draw (with any stakes returned) and remove them from any mailing lists
- We will contact the police in the event of actual or potential underage gambling and no winnings will be paid on transactions accepted from anyone under 16
- We reserve the right to ask for proof of age from any customer and staff and volunteers are trained to ask anyone who looks underage for proof of identity. If we are in any doubt we will not sell any tickets to that customer until proof of identity is provided
- Online entries to our weekly subscription lottery are subject to self-verification, whereby we use the player's given date of birth and their own confirmation by way of a tickbox that they are over the age of 16
- Where possible we check our database to ensure persons are above the legal age limit before data is selected for the use of a lottery
- All staff and volunteers are made aware that the law prohibits underage gambling and to only sell tickets to those aged 16 and over

All staff and volunteers are given the option of not selling tickets and all staff and volunteers under the age of 16 are excluded from any gambling activity.

Tenovus Cancer Care is also committed to ensuring other vulnerable people are protected, and that tickets are not knowingly sold to people if it is suspected they are incapable of making an informed decision because of health problems, disabilities or substance misuse. Staff and third parties are encouraged to provide information about the lottery and politely

suggest that the person discusses with a family member or carer prior to purchasing a ticket.

We will also provide any player with a full history of their lottery membership, including complete payment and winnings history upon request.

We will also ensure that the marketing, advertising and promotion of lotteries are conducted in line with the advertising codes of practice issued by the Committee of Advertising Practice and the Broadcast Committee of Advertising Practice.

2.4. Social Responsibility

This section describes the policies and procedures for customer interaction where there are concerns that a customer's behaviour may indicate problem gambling.

Staying in control

Whilst the majority of our supporters gamble within their means, for some it can be more difficult. Our intention is to present supporters with incentives that do not encourage problem gambling and are set within sensible spending.

- There is a restriction in place on the number of raffle tickets and lottery numbers that can be allocated to an individual
- The maximum is two lottery books of 10 tickets, per person and 10 weekly lottery entries per week
- Staff and Volunteers will not accept the purchase of raffle tickets on behalf of another person, or where we are able to identify that money has been borrowed in order to pay for the tickets (i.e. customer lending to another customer in a shop)

Direction to counselling/advisory services

We are committed to making clear information about the risks of gambling and treatment of problem gambling and ensure that information about the support available for those who feel they have a problem is made clear on our web site and in promotional materials.

Self-Help, Exclusion and Awareness Information

We signpost our users who feel they may need support to the Gambleaware website (www.gambleaware.co.uk) where there is an array of support and advice.

We also remove, within 48 hours of receiving any request, the names from our mailing list of those who do not wish to receive any further gambling mailings. These names are held on a register of those who have excluded themselves from gambling and no gambling materials will be sent to them again.

If you or a family member feels that they are experiencing problems with gambling, you can seek advice and support from trained counsellors at Gambleaware by calling free on 0800 8020 133 or via their website www.gambleaware.co.uk.

Contribution to research and public education

Tenovus Cancer Care is a member of the Lotteries Council, which makes an annual donation to the Responsible Gambling Trust, who focus on gambling related treatment and harm prevention activities.

3. Policy Implementation

All staff and volunteers involved in the selling of raffle or lottery tickets will receive regular training and guidance ensuring that they are aware of our Gambling Policy and social

responsibility, as well as ensuring operational requirements in line with LCCP are followed.

A record of all training, along with a standard evaluation form from each delegate is maintained by the people and development team.

Handbooks have also been developed and made available to all staff and volunteers involved in selling lottery tickets as an ongoing reference and will be maintained and re-distributed in line with any changes as required.

4. Review and Assessment of Policy

This policy will be reviewed on an annual basis or following any changes implemented by the Gambling Commission. The last review date will be clearly stated at the end of the policy.

In order to keep up to date with the gambling industry and any changes to the LCCP, Tenovus Cancer Care will check the Gambling Commission website on a monthly basis for any changes, as well as receiving the regular Gambling Commission e-bulletin to be informed of latest news.

All procedures will be updated in accordance with any changes to the above and communicated to all relevant staff and volunteers through appropriate channels. All staff and volunteers will be reminded of the policy, rules and associated procedures ahead of each draw promotion and will be asked to confirm that they have read and understood any changes.

Last Review Date: 12th April 2018