

Social Responsibility in Gambling Policy

Introduction

PDSA Trading Limited 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. PDSA Trading Limited is licensed by the Gambling Commission and operates two activities under this license:

1. Raffle sales undertaken directly by PDSA Trading Limited
2. Contracted Society Lottery services managed on our behalf by Postcode Lottery Limited.

The related specifics of each as well as our commitment to act in a social responsible way, are detailed below. The sole purpose of the activities is to raise funds for PDSA, the People's Dispensary for Sick Animals Registered Charity nos. 208217 & SC037585.

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

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

1. Preventing Gambling from being a source of crime and disorder

When an individual joins a lottery we will check that:

- The individual is aged 16 or over.
- The individual is resident in Great Britain.

For PDSA raffle sales undertaken directly by PDSA we:

- retain the right to prevent individuals from taking part in future lotteries or limit ticket sales should we suspect any criminal or otherwise undesirable activity.
- have established anti-money laundering procedures which require any suspicious transactions to be reported to our Money Laundering Officer or Deputy.
- ensure all lottery related computers and software is password protected and accessible only by authorised members of staff.

For our contracted society lottery services managed on our behalf by Postcode Lottery Limited:

- players need to provide their date of birth and need to have a bank account or other age-verified payment methods.
- lottery tickets are dependent on the provision by a player of their valid GB postcode.
- prizes are only paid 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

For both PDSA raffle sales undertaken directly by PDSA Trading Limited and our contracted society lottery services managed on our behalf by Postcode Lottery Limited activities, we will ensure that:

- 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.
- the rules are fair.
- any advertising and promotional material is clear and not misleading.
- the results are made public.
- 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 complaints process is in place to deal with any issues in a clear and procedural way including Alternative Dispute Resolution.

For our contracted society lottery services managed on our behalf by Postcode Lottery Limited:

- 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.

3. Protecting Children and other vulnerable persons from being harmed or exploited by 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 aged 16 or over then any winnings will be forfeited.

For lottery sales undertaken directly by PDSA Trading Limited we will use our best endeavours to address the following issues:

- **Gambling Limits.** PDSA may impose limits on the value of entries into a lottery that can be purchased by an individual.
- **Marketing.** Careful attention is paid to the design and content of our marketing material in order that our lotteries are not attractive to children or young people, or vulnerable persons.
- **Self Help and Awareness information.** We will provide information on Gambling Support Organisations. We will provide contact details or links on any lottery websites or via other appropriate media to GambleAware and other relevant/appropriate organisations.

For our contracted society lottery services managed on our behalf by Postcode Lottery Limited:

- 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, which are 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.
- A customer care process that creates an alert when a player subscribes with more than six tickets.

Should this occur, we will address the following issues:

- **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.

4. Self-Exclusion

For both activities, any players that wish to self-exclude from lottery participation can do so.

For lottery sales undertaken directly by PDSA Trading Limited we will apply the following procedure. On request, we will prevent entry into our lottery for an agreed period. Supporters will be removed from marketing activity on our lottery programme. Should a supporter who has requested self-exclusion attempt to play, a flag will indicate that this supporter has requested self-exclusion and will not be able to participate whilst these flags are in place.

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 up to 12 months. At the end of the period, 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 24 days to cool off before being allowed to reactivate their play. (see Self-Exclusion Policy).

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.

5. Promotion of Social Responsibility in Gambling

Through PDSA's membership to the Lotteries Council, we regularly contribute to the Responsibility in Gambling Trust (RGT) to fund research and public education on the risks of gambling and how to gamble safely.

For both activities we provide Information on gambling support organisations. On both PDSA's website and the People's Postcode Lottery website we provide a click through logo to the GambleAware website. In the event that a player feels their level of gambling is causing difficulties, PDSA's customer service team or People's Postcode Lottery in-house customer care team will actively refer them to these services.

General Points about People's Postcode Lottery

In their operations, People's Postcode Lottery confirms that:

- The Lottery is regulated by the Gambling Commission under licences 829-N-102511-010 and 829-R-102513-009.
- 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

People's Postcode Lottery 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 ever be passed to third parties.

Legal requirements

People's Postcode Lottery will adhere to all relevant legal requirements in order to promote multiple society lotteries and has significant experience in operating responsible processes within the legal framework required for the business.

Review

This policy will be reviewed on an annual basis.

Reviewed: June 2016