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**Social Responsibility Policy**

Key Facts:

* This policy applies to the Veterans Foundation licence holders, External Lottery Managers, staff, volunteers, fundraisers, and third-party suppliers who carry out activities in relation the Veterans’ Foundation Lottery.
* The Veterans’ Foundation lottery is managed by an External Lottery Manager (ELM), Bee-Ethical Ltd. Bee-Ethical are committed to ensuring that the lottery is operated in a secure, fair, and socially responsible way and to endorse responsible gambling amongst the lottery members.
* The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005, is based on 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

Purpose of the Policy

The Veterans’ Foundation provides grants to other smaller Veterans’ charities and organisations that are helping members of the armed forces’ community who are in need. Fundraising is completed in a number of ways to raise the necessary funds to provide grants. One important aspect of this fundraising activity is the ‘‘Veterans’ Lottery’’.

Lotteries must be conducted in line with the Gambling Act 2005 and, as lottery licence holders, we are regulated by The Gambling Commission. The Veterans’ Foundation holds both remote and non-remote lottery licences, we must comply with the Licence Conditions and Codes of Practice (LCCP) issued by the Gambling Commission.

The Veterans’ Foundation employs an ELM, Bee-Ethical Ltd, to fulfil various aspects of the lottery programme. Bee-Ethical Ltd holds their own licenses and are also regulated by the Gambling Commission and therefore must also adhere to the LCCP.

Who is covered by this policy?

This policy applies to the Veterans’ Foundation Licence holders, ELMs, staff, volunteers, fundraisers and third-party suppliers who carry out activities in relation to the Veterans’ Foundation lottery. Such activities include marketing, handling complaints, the administration of the lottery and awarding of prizes.

Operating licences

The Veterans’ Lottery is registered with the Gambling Commission and has been issued with the necessary operating licences.

* Remote Lottery Licence- to be used for the promotion of the lottery via the internet, telephone, television or any other electronic or technological method of communication
* Non-Remote Lottery Licence- to be used for the promotion of lotteries via non-electronic means, such as door to door, venue fundraising or print.

Fair and Open Draws

The Veterans’ Lottery is committed to conducting its lottery in a fair and open way. It does so by ensuring the following:

* Players have access to clear information on matters such as the rules of the lotteries, the prizes that are available and the chances of winning
* The rules are fair
* Any advertising and promotional material is clear and not misleading
* The results are made public
* We use tried and tested lottery software to administer our lotteries using a software supplier that uses a random number generator in line with Gambling Commission regulations
* There is a restriction in place on the number of lottery numbers that can be allocated for an individual (5)
* All ticket/number dispatches are recorded
* A complaints procedure is in place including an independent arbitration service

Terms and Conditions- Significant terms:

Prior to entry through both remote and non-remote channels, the Veterans’ lottery will ensure that all significant terms are available to participants. These being but not excluded to:

* Cost of entry
* Draw date
* When payment will be made
* Prizes available
* Minimum age of entry

A full list of the Terms and Conditions are published on the Veterans’ Foundation website:

<https://www.veteransfoundation.org.uk/media/jw0j212d/vl-terms-conditions04.pdf>

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

While it is legally permissible for persons over the age of 16 to play lotteries, The Veterans’ Foundation has made a decision to not allow anyone under the age of 18 to play in its lottery. The Veterans’ Foundation will not permit sales of tickets to any person in vulnerable circumstances to participate in its lottery.

The Veterans’ Foundation will use its best endeavours to address the following issues:

* Underage gambling: During the registration process for joining the lottery, it states that ‘’you must be over the age of 18 to play the Veterans’ Lottery’’, and the member must then confirm their date of birth. On the last page of the registration process, the member will have to tick a box ‘’I confirm that I have read and agree to the T&Cs, that I am over 18 and I am a resident of the UK’’.

The Veterans’ Lottery software checks 10% of all new sign ups. All winners go through verification checks and if any member fails, the Veterans’ Lottery will request ID. Their lottery account will remain deactivated until ID is provided. No prize payment will be made to anyone under the age of 18.

Veterans’ Lottery staff, including Fundraisers, are trained to avoid persons who are, or who appear to be under the age of 18.

* Vulnerable persons: Staff, including our Fundraisers, are trained to detect vulnerability in potential members and politely decline offers of support from such individuals. They will refuse to accept any further participation from people who are suspected of being, or have been found to be vulnerable. People particularly at risk include the elderly, those with mental health issues and those under the influence of drugs or alcohol.

Where a person has been deemed vulnerable at the point of sign up, the registration will be cancelled, and all monies will be refunded to the supporter.

* Underage staff: The Veterans’ Foundation and its ELM do not employ anyone under the age of 18 years, as paid staff, fundraisers, or volunteers.
* Marketing: To ensure that our lottery does not appeal to children or young people, careful attention is paid to the design and content of our marketing material

Preventing gambling from being a source of crime and disorder

The Veterans’ Foundation is committed to prevent gambling from being a source of or associated with crime or disorder, or being used to support crime.

When an individual joins the lottery, we will ensure that:

* The individual is aged 18 or over
* The individual is a resident of the UK
* We do not suspect money laundering in any way, in line with the Proceeds of Crime Act

We also:

* Retain the right to cancel any membership should we suspect criminal activity
* Limit the maximum number of entries to 5 per person, per month
* Do not allow our Fundraisers to accept cash
* Provide training to all new employees, employed by the Veterans’ Foundation and its ELM
* We will record any incidents for reference
* Immediately act to suspend any employee, supplier employee or supplier associated with the Veterans’ Lottery, if a direct or indirect association with criminal activity is detected
* Will refuse to contract with any contractors, or agents who are suspected of being associated with any potential or actual criminal activities

Software

The Veterans’ Lottery will only use gambling software that has been licensed by the Gambling Commission, via our contracted ELM, Bee-Ethical. Bee-Ethical sub-contract the work to manufacture, supply, install or adapt software used to promote the lottery.

The Veterans’ Foundation will ensure that its lottery administration is conducted from secure premises that have adequate systems and processes in place that:

* Restrict access to the buildings and premises
* Control the use of and access to passwords, safes, locked cupboards, computer networks and the internet

The Veterans’ Lottery operates a subscription based monthly lottery. Registration is designed to allow for one entry, per person at the point of entry. Should a member wish to have more than one entry, they will follow the registration process again (to a max of 5 entries). Any further requests over the amount of 5 accounts, will be closed and the member will be informed. In this way the risk of using lotteries for money laundering purposes is minimal.

The Veterans’ Lottery promotes the sale of both remote and non-remote lottery entries via Direct Debit on a per calendar basis, protecting customers in line with the Direct Debit guarantee. As an alternative, members are able to pay for a 1-year subscription by sending in a cheque of £120, to our admin team.

Sellers of the non-remote lottery tickets (Fundraisers), whether door to door, kiosk or telemarketing are not permitted to take cash or cheques in lieu of payment.

The Veterans’ Lottery will not accept suspicious or fraudulent transactions and will report such transactions to the National Crime Agency in line with The Proceeds of Crime Act 2002. The Veterans’ Lottery will provide the Gambling Commission with any information related to any offence under the Act.

Promotion of Social Responsibility in Gambling

The Veterans’ Foundation understands that on occasion some individuals may require assistance with regard to responsible gambling. The Veterans’ Lottery takes the following steps to ensure the promotion of social responsibility in gambling:

* Self-Exclusion: The Veterans’ Lottery has a self-exclusion process in place for existing and potential members which begins with a request from the individual. A self-exclusion form is available on the Veterans’ Foundation website:
	+ On request, we will close any member lottery account subscription(s) for a minimum period of six months during which time the subscription(s) cannot be reinstated.
	+ During this period The Veterans’ Lottery will ensure that the individual does not attempt to open a new subscription. The account will remain inactive until the individual contacts the admin team.
	+ Once the 6 month period surpasses, our admin team will automatically extend this period by a further 12 months.
	+ The individuals details will be removed from the Veterans’ Lottery database to ensure that they do not receive any marketing materials.
	+ All monies paid will be refunded if applicable
	+ Details of individual will be recorded on our self-exclusion register
* Gambling limits: We have imposed limits on the number of entries (5 per month) into a lottery than can be purchased by an individual
* Access to player history: We 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: We will provide contact details or links on our website or via other appropriate media together with links to, or contact details of Be Gamble Aware and other relevant organisations
* Staff Training: Staff involved in the lottery will receive awareness training on problem gambling issues at induction and at regular intervals throughout their employment

Responsible Gambling

Whilst the majority of people do gamble within their means, for some, gambling can become a problem. To keep gambling under control, The Veterans’ Lottery recommends:

* Gambling should be entertaining and not seen as a way of making money
* Avoid chasing losses
* Only gamble what you can afford to lose
* Keep track of the time and amount you spend whilst gambling
* Before playing, set strict limits on how much money you can spend
* Keep up other interests and hobbies and to not let gambling take over one’s life
* Should a member wish to take a break from participating in the Veterans’ Lottery, they can use our self-exclusion form
* Contact GamCare: they are a registered charity that provides confidential telephone support and counselling to anyone who is affected by problem gambling. GamCare can be contacted on 0845 6000 133

Problem Gambling

It may be relative, partner or friend that identifies that a participant may have difficulties with their gambling practices. Participating members with any concerns or relatives, partners or friends with similar concerns for any individuals may wish to consider the following questions in order to assess the impact that participation in gambling activities may have,

How to identify gambling has become a problem:

* Do you hide your gambling from those around you?
* Do you stay away from work or college to gamble?
* When gambling and you run out of money, do you feel lost and in despair and need to gamble again as soon as possible?
* Do you gamble until your last penny is gone, even the fare home or the cost of a cup of tea?
* Have you ever lied to cover up the amount of money or time you have spent gambling?
* Have others ever criticised your gambling?
* Have you lost interest I your family, friends or hobbies?
* After losing, do you feel you must try and win back your losses as soon as possible?
* Do arguments, frustrations or disappointments make you want to gamble?
* Do you feel depressed or even suicidal because of your gambling?

If some of the above signs are present, it is likely that a gambling problem exists. Should any participant feel they are losing the ability to control their play, we would strongly advise that they seek an immediate stop to their gambling activity.

Further help and information on problem gambling

The Veterans’ Lottery is committed to supporting people with problem gambling and supporting them to gamble responsibly. The following has been put in place to encourage responsible gambling and to seek help should gambling have become a problem.

* Members can request self-exclusion from the Veterans’ Lottery. Details on counselling and support services are included in our ‘Problematic Gambling & Self-Exclusion’ document on our website
* The Veterans’ Lottery is an active member of the Lotteries Council, an umbrella body which promotes the interests of organisations which run lotteries. The Lotteries Council make an annual donation to BeGambleAware on behalf of its members
* The Veterans’ Foundation website features the BeGambleAware logo and website address, along with the National Gambling Helpline with the following supporting text.

‘’if you feel you have a problem with gambling, visit [www.begambleaware.org](http://www.begambleaware.org) or call the National Gambling Helpline on 0808 8020 133’’.

* The Veterans’ Foundation website features a link to preventative software, including the below supporting text.

‘’Software is available to prevent an individual computer from accessing gambling internet sites- please see [www.gamblock.com](http://www.gamblock.com) for further information’’