

# **CHILDREN 1<sup>ST</sup>**

## **Social Responsibility Policy**

CHILDREN 1<sup>ST</sup> promotes its' own society lottery for the sole purpose of raising funds for CHILDREN 1<sup>ST</sup> to support vulnerable children across Scotland. The lottery is managed on behalf of CHILDREN 1<sup>ST</sup> by its' External Lottery Manager; People's Postcode Lottery

CHILDREN 1<sup>ST</sup> is committed to ensuring that the Lottery is operated in a secure, fair and socially responsible way and to endorsing responsible gambling amongst its players. It expects its' ELM to have the appropriate processes in place to ensure that the objects outlined in the Gambling Act 2005 (listed below) and referred to in this policy, stand up to scrutiny.

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.

This document sets out CHILDREN 1<sup>ST</sup> policies and approach to ensuring we approach any gambling activities in a socially responsible way.

### **1. Preventing gambling from being a source of crime and disorder**

When an individual joins the Lottery we will check that:

- The individual is aged 16 or over
  - players need to provide their date of birth, need to have a bank account, and prizes are paid out only to direct playing bank account.
- The individual is resident in the UK.
  - lottery tickets are dependent on the provision by a player of their valid UK postcode

In our operations, we confirm that:

- CHILDREN 1<sup>ST</sup> is a charity with clear charitable objects
- while promoting lotteries, CHILDREN 1<sup>ST</sup> does not handle large sums of cash
- money is only processed directly between bank accounts
- CHILDREN 1<sup>ST</sup> retains the right to cancel any subscription should we suspect criminal activity

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

We will ensure that our ELM provides:

- customer care processes that alert when a player subscribes with over 6 tickets.
- Players have access to clear information on matters such as the rules of the lottery, 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.

- A complaints process is in place to deal with any issues in a clear and procedural way.

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

- CHILDREN 1<sup>ST</sup> adheres to advertisement rules laid out by the Committee of Advertising Practice which can be summarized as:
  - Not encourage gambling that may lead to socially irresponsible acts or could lead to financial, social or emotional harm.
  - Not exploit children or other vulnerable persons.
  - Not suggest gambling can solve financial problems or debts.
  - Not suggest gambling can increase attractiveness or sexual success.
  - Not link gambling to youth culture or attempt to attract young persons to gamble.
- For Direct Mail marketing only electoral roll (over 18s) data is used.
- It is intended that in the foreseeable future the only method of joining the Lottery provided by our ELM is via Direct Debit which requires age verification.

We will use our best endeavours to address the following issues:

- Under age 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 16 or over then any winnings will be forfeited.
- Gambling Limits. The Trust may impose limits on the value of entries into a lottery that can be purchased by an individual.
- Self Exclusion. On request, we will close any player's lottery membership(s) for an agreed period. During this period we will also try to ensure that the individual does not try and open a new membership.
- Access to Player History. We will provide any player with a full history of their lottery membership, including complete payment and winnings history upon request.
- Provide Information on Gambling Support Organisations. We will provide contact details on the Trust's website for GamCare and other relevant / appropriate organisations.
- In the event that a player feels their level of gambling is causing difficulties, help is available from our in-house customer care team.
- All staff are trained and made fully aware of our social responsibility policies.

### **Customer management process**

#### **Prize management support**

We understand that suddenly winning a large amount of money can be overwhelming and sometimes be difficult to manage. We will therefore offer support services (psychological, economic and legal advice) to all players who are lucky enough to win a prize in excess of £500,000.

#### **Data Protection**

CHILDREN 1<sup>ST</sup>'s ELM will manage all details relating to players, and their bank account securely and in accordance to the requirements of the Data Protection Act. No players details will be ever passed to third parties.

### **Legal requirements**

CHILDREN 1<sup>ST</sup> will adhere to all relevant legal requirements in order to promote its Lottery and our ELM has significant experience in operating responsible processes within the legal framework required for the business.