

## Social Responsibility Policy

### FR001

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Policy author name & title	Director of Fundraising

### Version Tracking

Version	Date ratified	Summary of changes	Author
1.0		<ul style="list-style-type: none"> <li>Policy created</li> </ul>	Neil Harman, Director of Fundraising
1.1		<ul style="list-style-type: none"> <li>Name changes to promoter and responsible people</li> </ul>	Andy Holland, Director of Fundraising

## 1. POLICY SUMMARY

This document sets out policies and the approach to ensuring we approach any gambling activities in a socially responsible way. Thames Valley Air Ambulance Lottery staff are familiar with this document and read it upon appointment and annually thereafter.

## 2. PURPOSE OF POLICY

Thames Valley Air Ambulance operates a Society Lottery for the public in Berkshire, Oxfordshire and Buckinghamshire, for the sole purpose of raising funds for Thames Valley Air Ambulance.

The Thames Valley Air Ambulance is committed to ensuring that the lottery is operated in a secure, fair, and socially responsible way and to endorse responsible gambling amongst its members.

## 3. RESPONSIBILITIES

The Director of Fundraising has overall responsibility to ensure that the policy is fit for purpose and disseminated appropriately throughout the organisation.

All Thames Valley Air Ambulance staff and volunteers are expected to adhere to this policy and procedure.

## 4. POLICY STATEMENT

- The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on three 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.
- This document sets out policies and approach to ensuring we approach any gambling activities in a socially responsible way. Thames Valley Air Ambulance Responsible Persons are familiar with this document and read it upon appointment and every 12 months thereafter.
- For the purposes of this policy, the term lottery covers both raffle and lottery, unless stated otherwise.

## 5. POLICY DETAIL

See Appendix 1.

## 6. COMPLIANCE

This policy and procedure will be reviewed annually by the Director of Fundraising and Assistant Director of Fundraising.

## 7. BREACH OF POLICY

Any deviation in practice from the above policy and procedure will be deemed a breach of policy.

Any breach of this policy by Thames Valley Air Ambulance employees may lead to formal disciplinary action. under the Disciplinary Policy HR004.

## 8. REFERENCES

8.1 The Gambling Act 2005.

**APPENDIX 1 – SOCIAL RESPONSIBILITY IN GAMBLING POLICY**

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## 9. BACKGROUND

Thames Valley Air Ambulance operates a Society Lottery for the public in Berkshire, Oxfordshire and Buckinghamshire and the surrounding area, for the sole purpose of raising funds for Thames Valley Air Ambulance.

The Thames Valley Air Ambulance is committed to ensuring that the lottery is operated in a secure, fair, and socially responsible way and to endorse 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 three 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.

## 10. PREVENTING GAMBLING FROM BEING A SOURCE OF CRIME AND DISORDER

When an individual joins the lottery we will check that:

- The individual is aged 18 or over.
- The individual is resident in the UK.
- The Charity retains the right to cancel any membership should they suspect criminal activity.
- The Charity may limit the maximum number of entries to £20 per person per week.
- The Charity will ensure their staff are trained to detect and how to report potential money laundering threats. They all complete internal money laundering training.
- We also retain the right to cancel any membership should we suspect criminal activity.
- We have policies and procedures relating to cash handling in place designed to minimise the risk of crime.
- We limit the maximum number of entries into the lottery to £20 per person per week.
- We will record any incidents for future reference.
- Thames Valley Air Ambulance require all staff and canvassers, employed either directly or through an agency to have had the appropriate background checks.
- As part of the staff recruitment processes at our canvassing agency(s) references are required.
- In relation to our raffle, we have a limit of 60 tickets per individual and record all tickets which are sent out and returned.
- For the raffle we will not send in excess of 60 tickets to an individual without customer interaction.

## 11. ENSURING THAT GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY.

We will ensure that:

- Players have access to clear information on matters such as the rules of the lottery, the prizes that are available and how winners are selected.
- The rules are fair.
- Any advertising and promotional material is clear and not misleading.
- The results are made public.
- All lottery draws are conducted using a Random Number Generator, all raffle draws are conducted using a blind draw in sight of witnesses, or at an offsite location using a third-party supplier.
- A complaints procedure is in place.
- Terms and conditions of the lottery are published on the website and promotional materials. Rules for raffles are printed on tickets and provided on the website.
- Thames Valley Air Ambulance staff who work directly on the lottery and the staff of our lottery supplier are not eligible to enter the lottery. All Thames Valley Air Ambulance staff are not eligible to enter the raffle.

## 12. PROTECTING CHILDREN AND OTHER VULNERABLE PERSONS FROM BEING HARMED OR EXPLOITED BY GAMBLING.

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

### **1. Age verification**

It is illegal for individuals under the age of 18 to enter a lottery. We reserve the right to ask for proof of age from any customer and customer accounts may be suspended until satisfactory proof of age is provided. If for whatever reason, upon winning any individual is unable to prove that they are 18 or over then any winnings will be forfeited.

### **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.

### **3. Gambling limits.**

The Charity may impose limits on the value of entries into a 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 or chances) may indicate problem gambling, they will be trained

to report the matter to the responsible person or other suitably appointed person for the lottery the customer will be called to discuss the matter, including the help that is available for problem gamblers.

In severe cases, consideration may be given to barring the customer from participating in the lottery.

#### **4. Self-Exclusion.**

The Charity will take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.

A customer who has made contact to request self-exclusion will be refused service and prevented from gambling with any lottery administered by The Charity.

A request for self-exclusion will be available with immediate effect and with no “cooling off” period.

During this period, we will take all reasonable steps to ensure that the individual does not try and play any lotteries administered by The Charity and to prevent any marketing material being sent to them.

We will remove name and details of a self-excluded person from any marketing databases and otherwise flag them as an individual to whom marketing material must not be sent within two days of having received the completed self-exclusion notification.

An individual when requesting self-exclusion will be informed as to what self-exclusion is and will be provided information on gambling support agencies.

The main being: [www.gamcare.org.uk](http://www.gamcare.org.uk) or telephone 0808 8020 133

The individual's lottery account will be closed. Any balances outstanding on that 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 Standing Order, they will have to contact their bank directly to cancel the Standing Order and we will refund them by cheque each month until such time as the instruction has been cancelled. Where the individual pays by Direct Debit we will cancel the Direct Debit and refund any unused credit on the ticket(s).

During the period of self-exclusion, they will not be entered into any charity lottery draw promoted by The Charity, even if the individual has failed to cancel their Instruction.

After the self-exclusion period ends, if the individual wishes to recommence participating in any of the lotteries promoted by us, he she 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.

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 or links on any lottery websites or via other appropriate media to Gamble Aware and other relevant organisations. We also provide financial support to the Responsible Gambling Trust, which raises funds to support research, education, and treatment of problem gambling.

Self Help and Awareness Information. We will provide self-help and awareness information on any lottery websites or other appropriate media together with links to or contact details of Gamble Aware and other relevant / appropriate organisations.

## **5. Complaint's procedure summary**

The Fundraising Team are responsible for the day-to-day management of supporter contact enquiries. They will likely be the first point of contact for complaints, concerns, comments, compliments, and requests for information and are responsible for the day-to-day coordination of all feedback.

The Fundraising Team are required to work with the investigating managers to support the completion of a timely investigation and keep the complainant updated with the progress. They will ensure that:

- All complainants are treated with respect and dignity.
- No discrimination including age, gender, disability, ethnicity, religion, sexual orientation will occur because of making a complaint.
- That supporter complaints or concerns involving third parties (such as Lottery Fundraising Services (LFS)) are passed to the third party in a timely manner to ensure a response can be provided by the Supporter Engagement Team to the complainant in line with TVAA policy.
- The complainant will receive a letter of response from the responsible person addressing their concerns, with demonstrable lessons learnt, actions taken and an apology if appropriate.

The Director of Fundraising (Responsible Person) has a responsibility to assist in bringing the complaints process to the satisfactory conclusion of the complainant by:

- Ensuring that all complaints are acknowledged in accordance with TVAA policy.
- Are allocated to an appropriate investigating manager depending on the grading and seriousness of the complaint.
- Ensuring that the complaint is investigated in a timely manner as determined by the Policy.



- Ensuring that all aspects of the complaint have been fully investigated and any recommendations are followed up and actioned.
- Ensure any reports, or notifications have been submitted, if required, to the relevant authority and that information is shared with the Compliance and Patient Safety Team for the purposes of quality reporting.
- Ensuring that all actions have been completed.
- Monitor complaint numbers and timeframes.

The Investigation Manager is responsible for:

- Contacting the complainant to establish a rapport and to gather any further facts.
- Ensure that the complaint is investigated within the timescale allocated and where this is not possible inform the Head of Compliance and Patient Safety or Head of Supporter Engagement who will ensure this is documented.
- Submit their investigation report to the Charity's incident management system, ensuring all areas of the complaint have been addressed.
- Feedback investigation outcome and any lessons learned to the appropriate line manager and staff involved in the complaint.
- If appropriate, disseminate any identified learning across the Charity and wider circulation if required.

### **What can the complainant expect?**

- The complainant should expect an acknowledgement of their complaint within 3 working days by telephone to establish the nature of their complaint, the timescale for investigation, to confirm a single point of contact and how they can get support. The Charity aims to investigate and respond to all complaints within 20 working days, however, there may be circumstances in which this does not allow enough time to thoroughly investigate the complaint, but the complainant will be kept up to date where necessary.
- Where a complaint results in a Serious Incident, the Charity aims to respond within 60 working days to allow time to conduct a full and thorough investigation and ensure that both learning and actions following investigation are implemented.
- The complainant should receive a response in writing which addresses the areas of concern raised and an apology where an apology is required. They will also be kept informed throughout the complaints process and updated where a delay in the investigation has occurred.

### **Next steps and referral**

If on conclusion of the investigation the complainant remains dissatisfied by the response, they should be directed in the first instance to write to the CEO.

Following this, if the complainant reasonably believes that the appropriate action has not been taken, they may report the matter to the proper External Regulatory authority.

The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- The Charity Commission
- The Parliamentary and Health Service Ombudsman
- The Fundraising Regulator
- HM Revenue & Customs
- The Financial Services Authority
- The Office of Fair Trading
- The Health and Safety Executive
- The Environment Agency
- The Director of Public Prosecutions
- The Serious Fraud Office
- The Information Commissions Office
- Independent Betting Arbitration Service

Signposting information to complainants regarding the appropriate organisation to assist them in doing so is provided on the TVAA. This includes the Independent Betting and Arbitration Service.

Independent Betting and Adjudication Service  
PO Box 62639  
London  
EC3P 3AS

Telephone: 020 7347 5883  
Fax: 202 7347 5882  
Email: [adjudication@ibas-uk.co.uk](mailto:adjudication@ibas-uk.co.uk)

All full copy our complaints procedure can be found on our website:  
[www.tvairambulance.org.uk/contact/feedback](http://www.tvairambulance.org.uk/contact/feedback) or by calling 0300 999 0135

## **6. The Charity Responsible Gambling Guide**

**Website:** [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk).

**Our Commitment Towards Responsible Gambling:** The Charity is committed to ensure that information about how to gamble responsibly and how to access information and help in respect of problem gambling is readily available to all.

### **Keeping Your Gambling Under Control:**

The majority of people do gamble responsibly and gambling in moderation is okay, 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 time and money you are going to spend, before playing.
- Quitting while you are ahead.
- 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 have already lost.
- Keeping up other interests and hobbies and not letting gambling take over your life.
- Not gambling in order to escape from stress or boredom.

### 13. HOW TO IDENTIFY THAT GAMBLING IS BECOMING A PROBLEM:

For some people however, gambling can become a problem. If you are concerned about the amount you are gambling and feel it is taking over your life, and 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 you have 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 a 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 also wish to consider whether a friend or relative might have a gambling problem?

#### **How to Get More Information and Help About Problem Gambling:**

For friendly and helpful advice from trained counsellors, call **GamCare Speak to an advisor on Freephone 0808 8020 133**.

The helpline operates between 8am 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.

You can also visit the GamCare website at [www.gamcare.org.uk](http://www.gamcare.org.uk), for more information and advice.

#### **The Charity Lotteries Self Exclusion Form**

Self-exclusion procedures should require individuals to take positive action to self-exclude.

This can be a signature on a self-exclusion form which is available on our website or from The Charity on request.

#### **Promoter and Responsible persons:**

**Andy Holland – Director of Fundraising**  
**Jon De Keyser – Director of Finance**  
**Darren Luff – Assistant Director of Fundraising**  
Thames Valley Air Ambulance  
Stokenchurch House  
Oxford Road  
Stokenchurch  
Buckinghamshire  
HP14 3SX

**Registered Charity No. 123456**