

Lottery Policies and Procedures

Working Families is committed to ensuring that all its lottery activity is operated in a secure, fair and socially responsible way. The following policies and procedures detail the measures in place to ensure that its lottery activities are conducted in line with the regulatory framework set out by the Gambling Act 2005 by:

- 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, problem gamblers and other vulnerable persons from being harmed or exploited by gambling.

These policies and procedure apply to all employees and volunteers including, External Lottery Managers (ELM) and third-party contractors.

PROMOTING RESPONSIBLE GAMBLING

Purpose:

To ensure people gamble responsibly and provide details of how they can seek help should gambling become a problem.

Policy:

- BeGambleAware helpline number and website address will be published on lottery advertising collateral and on websites where a gambling is advertised, as well as where a supporter can purchase lottery tickets.
- Supporters cannot purchase entries into Working Families Weekly Lottery lotteries using credit cards via remote means, debit cards are permitted.
- Supporters can request a self-exclusion from our lottery at any time by contacting us via telephone, email or post. Anyone wishing to self-exclude will be excluded for a minimum period of 6 months.
- If supporters want to gamble again, they must take a positive action after the 6 months have passed. A 24-hour cooling off period will be given where an additional positive action will be required before they are permitted to gamble again.
- Supporters self-excluding will be signposted as to where they can get additional support, e.g. BeGambleAware
- Supporters who have self-excluded will be removed from future gambling related marketing for the duration of their self-exclusion.
- Supporters will be prevented from purchasing more than £5 worth of tickets per draw.
- We will make a payment each year to the Lotteries Council to fund research, education and treatment activities in relation to problem gambling.
- Individuals will be trained to spot behaviours which may indicate a supporter is a problem gambler.
- We will declare on our annual regulatory return the number of supporters who self-exclude because of problem gambling.

RESPONSIBLE GAMBLING INFORMATION TO SUPPORTERS

While the majority of our supporters gamble within their means, for some it can be more difficult.

Our intention is to present supporters with opportunities to enjoy the chance of winning prizes, while raising money to support our charitable work, which do not encourage problem gambling and are set within sensible spending limits.

The following information is in place to help you to gamble responsibly.

- You're buying fun, not investing your money.
- Set strict limits on how much time and money you're willing to spend.
- Quit while you're ahead.
- Only gamble with money you can afford to lose.
- Don't spend more money in the hope of winning back what you have lost.
- Keep up other interests and hobbies, don't let gambling take over your life.
- Don't gamble in order to escape from stress or boredom.
- Gambling in moderation is okay.

When gambling can become a problem

If you are concerned about the amount you are gambling, (or you are concerned for a friend or relative) then the following questions may help give you some guidance.

- Have you been criticised for your gambling?
- Have you lied to cover up the financial amount or the time you have spent gambling?
- Do arguments, stressful situations 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?
- If you lose, do you feel you must try to win back your losses as soon as possible?
- When you run out of money while gambling, do you feel lost and in despair, and feel the 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?
- Does your gambling ever make you feel depressed or even suicidal?

If you feel you are answering 'yes' to the majority of the questions above, then it is likely a gambling problem exists. Sometimes just telling someone about your concerns can be a relief and the first step toward dealing with your problem.

For friendly and helpful advice and support you can call The National Gambling Helpline on 0808 8020 133 or visit begambleaware.org for information or to use their live chat feature. Both the helpline and live chat are available 24 hours a day, 7 days a week.

PREVENTING GAMBLING FROM BECOMING A SOURCE OF CRIME

Purpose:

To provide detailed instructions ensuring our lotteries do not become a source of crime and disorder, being associated with crime and disorder, or being used to support crime.

Policy:

To prevent our lotteries becoming a source of crime, we will:

- Refuse to be associated with any proposed Lottery scheme or gambling activity that may breach the law.
- Refuse to contract with any contractors or agents who we suspect may be associated with any potential or actual criminal activities.
- Where required, only use suppliers who are licensed by the Gambling Commission to run all or part of our own lottery business.
- Require all suppliers to:
 - ensure they provide suitable employees and obtain references from all prospective employees that are likely to be associated with our gambling business.
 - ensure all staff working on behalf of Working Families Weekly Lottery must complete training on our policies and understand their responsibilities on working within the law.
 - monitor their employees on an ongoing basis, particularly regarding their direct or indirect association with potential criminal activities.
- Working Families and our ELM operates securely with fire safes in situ, and uses approved security service providers.
- Our ELM processes all monies received for lotteries which is held in trustee status by our ELM to maintain a separation from their own trading income. Our ELM will pay the full lottery proceeds into Working Families bank account weekly.
- Ensure no person is enrolled into any of our lottery schemes if that person is suspected of any potential or actual criminal activities.
- Freeze any transaction that appears to be suspicious, and any other transaction made by the same supporter.
- Conduct and regularly review an assessment of the money laundering risks to its business and record the outcome on the risk register, which is managed by Jane van Zyl.
- Ensure to investigate unusual patterns of transactions, and very high account turnover thoroughly as and when they occur.
- Prevent Supporters from purchasing more than £5 worth of tickets per draw.
- Train staff to look out for any suspicious activity relating to the purchase of lottery tickets in line with our Lottery Policies and Procedures and staff training, including training face to face fundraising staff to not accept Cash for any Lottery payment.
- Ensure all such activity will be reported to Jane van Zyl the Gambling Commission and if deemed necessary, the police.

- Ensure only supporters residing in the Great Britain are permitted to enter lotteries run by Working Families.
- Ensure all transactions on a players account are recorded and securely stored.
- Use payment provider(s) that have experienced risk and fraud teams who scan, validate and monitor payment card transactions for potentially suspicious transactions.
- Jane van Zyl will act as our Money Laundering Reporting Officer (MLRO). Ensure any change to the identity of the MLRO will be reported to the Gambling Commission as a 'Key Event' within 5 working days of the change.
- Obtain references from all prospective employees who are likely to be associated with Working Families Weekly Lottery gambling business.
- Take appropriate action as per the disciplinary policy, if made aware of any member of staff directly or indirectly associating in criminal activities.
- Ensure to report any actual or suspected criminal activities to Jane van Zyl and if deemed necessary, to the police.
- Train all staff involved in promoting lotteries or selling lottery tickets to a satisfactory standard to ensure compliance with Working Families Weekly Lottery policy and procedures and keep up-to-date checklist of staff who have read the policies and signed form to confirm.

PROTECTING CHILDREN AND VULNERABLE PEOPLE

Purpose:

To provide detailed instructions ensuring our lotteries do not attract children and/or vulnerable People.

Policy:

To prevent under age players from participating in any lotteries promoted by us we will:

- Check our databases, where possible, to ensure people are above the legal age limit before data is supplied for the use of a lottery.
- Detail the minimum age for play (which is 18) on the websites where lottery tickets can be purchased.
- Require any player entering via remote communication must provide a valid DOB and affirm their age.
- Working Families will ensure any form of acquisition activity to purchase lottery tickets contain:
 - a request for the applicant's date of birth
 - a statement that underage gambling is an offence.
- Randomly age verify three prize winners from our lottery by phone, before issuing the prize and record that age verification has occurred on their record.
- If suspicion arises that a player may have been dishonest about their age. We will try to obtain age verification by telephoning the player (where we have their number and permission) consulting other open source material such as the electoral register and finally by writing to

the individual. If we are still unable to obtain this verification, we will terminate the individuals account and return all monies paid.

- Return monies paid in relation to the lottery to any player that is found to be under age.
- Include in the rules that any prizes will not be provided to anyone who is found to be under-age.
- Ensure lotteries are not intentionally designed to appeal to children or young people who are underage by making it clear on all material that a player must be over 18 to play.
- Continuously review where and how we advertise our lotteries to ensure we do not intentionally appeal to children or young people who are under 18.
- Mark a record as 'Opt Out' on our database where a request to cease sending lottery marketing material is received from either an individual or a vulnerable person's carer in relation to the vulnerable person, as long as we had suitable permissions or Power of Attorney for the carer to make decisions on behalf of the individual.

KEEPING DRAWS FAIR AND OPEN

Purpose:

To provide detailed instructions to ensure draws are fair and open. Working Families Weekly Lottery will only conduct its lottery draws in association with a Gambling Commission licensed External Lottery Manager (ELM).

Policy:

Working Families will:

- Keep a record of all remote ticket sales for a minimum of 3 years.
- Keep a record of all lottery submissions for a minimum of 3 years, these records will include:
 - Lottery draw date
 - Branded/non-branded lottery
 - Type of lottery (raffle or subscription)
 - Ticket cost
 - Largest prize
 - Total prizes
 - Total proceeds of the lottery
 - Expenses incurred for each lottery and details of those expenses
 - Percentage of proceeds allocated directly to the purpose(s) of the Society (at least 20% of the gross proceeds)
 - Percentage allocated to prizes in each lottery
 - Number of unsold tickets in each lottery
 - Statement of confirmation
- Ensure all websites comply with the License Conditions and Codes of Practice (LCCP) and include:
 - The charities name, address, company registration number and Society registration number
 - The name and address of the member responsible for promoting the lottery
 - The ticket price
 - The date of the draw, or sufficient information to enable the date of the draw to be ascertained
 - The Gambling Commission account number and link to the Gambling Commission's register
 - A clear statement that persons under the age of 18 may not sell or purchase tickets, and will be unable to receive a prize
- Ensure any promotional materials for the lottery are clear and not misleading, and all advertising for the lottery complies with the advertising code of practice applicable to the form and media the advert is in.

- Ensure that the following information is detailed within the rules of each Lottery and is signposted to supporters prior to them entering the draw:
 - The prize list for each lottery draw
 - A description of how winners are determined and how prizes are allocated
 - The likelihood of winning a prize, which can be based on current or previous year
 - The percentage of the proceeds spent on prizes (including prizes rolled over) – can be based on previous year
 - The percentage of the proceeds spent on expenses related to promoting and running the lotteries – can be based on previous year
 - The percentage or amount of the proceeds applied directly to the purposes of the society and the total proceeds from all tickets sold.
- All draws are conducted by our ELM using a certified random number generator
- Notify winners within 7 days of the draw taking place.
- A list of winners, including winning numbers, will be published on the Working Families Weekly Lottery website. The winner's list will also be available on request, in hard copy or via email.
- If a first or second lottery prize winner has moved and cannot be located our ELM will not be able fulfil the requirements of the insured prize and it must therefore be returned to the ELM's insurance company as an unclaimed prize.
- If a lottery prize winner wishes to donate their prize to Working Families they must bank the prize and then raise their own donation.
- Prohibit employees of the society and our ELM, involved in the lottery operations, from playing the [Society Name's] lottery.
- Publish lottery rules on the website and any significant changes to how the Lottery is run will be communicated to all players by post or email.
- Ensure Working Families Weekly Lottery and our ELM will comply with the Gambling Commission's remote technical standards.
- Publish the proportion of money raised from ticket sales in the previous year that was returned directly for the purposes of the society.

COMPLAINTS AND DISPUTES

Purpose:

To provide detailed instructions on handling complaints and disputes. For the purposes of this procedure 'complaint' means an expression of dissatisfaction, whether spoken or written, about any aspect of the way the licensee conducts their licensed activities, e.g. a complaint:

- about the outcome of a gambling transaction
- about the way a gambling transaction has been managed
- that concerns the way the licence holder carries out its business in relation to licensing objectives.

Procedure:

Staff must ensure that:

- Any complaint received will be recorded upon receipt. The complainants contact information, details of the telephone adviser who took the call or member of staff who investigated the written complaint, the nature of the complaint and how the complaint was investigated and resolved will be recorded.
- All complaints are investigated and escalated where appropriate
- Resolution of a gambling related complaint, including escalation should take no longer than eight weeks from when the complaint was first received (this period can be extended if the supporter fails to respond to a reasonable request for information within seven days).
- If an individual is unhappy with the resolution of their gambling related complaint, or it remains unresolved after eight weeks Working Families must then write to the supporter with a final letter to explain:
 - the final decision
 - that this is the end of the Society's complaints process, and
 - how to escalate their complaint to a Gambling Commission approved Alternative Dispute Resolution (ADR) entity, if they wish to.
- Access to the ADR entity is free of charge to players and will not restrict players' rights to bring proceedings in any court of competent jurisdiction. The decision of the ADR entity will be binding on both parties.
- We will declare on our annual regulatory return the number of complaints and disputes received
- A record of all complaints and disputes will be held for 3 years

REPORTING

Purpose:

To detail the requirements for notifying the Gambling Commission (GC) of any Key Events as defined in the Licence Conditions and Codes of Practice (LCCP), as well as required information recording and reporting requirements.

Working Families will:

- Inform the GC of the occurrence of Key Events, as defined in the LCCP, within 5 working days of the occurrence of the event.
- Inform the GC of other reporting events in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable.
- Ensure all Key Event and other reportable event notifications to the GC include the date the event took place, a description of the event and its outcome.
- Raise a SAR (suspicious activity report) with the National Crime Agency if there is knowledge or suspicion of money laundering or terrorist financing.

Key Events and other reportable events include, but not limited to the following:

- Any material changes in Working Families structure or the operation of its business

- Any material changes in managerial responsibilities or governance arrangements
- The arrival or departure of any individual occupying a key management position or any change to the identity of the Money Laundering Reporting Officer or their Deputy.
- Any petition being presented for the winding up of Working Families
- Any material changes in Working Families banking arrangements
- Any change in Working Families arrangements for the protection of customer funds
- Any criminal investigation by a law enforcement agency in any jurisdiction involving Working Families
- The imposition by Working Families of a disciplinary sanction against the holder of a personal licence or person occupying a qualifying position for gross misconduct.
- Any breach in Working Families information security that adversely affects the confidentiality of supporter data.
- The commencement or cessation by Working Families of trading on website domains
- Any person who has gambled with Working Families who has died by suicide, whether such suicide is known or suspected to be associated with gambling.
- Knowledge or suspicion of money laundering or terrorist financing, or fraud.
- Change of Head Office or registered address.
- Change of trading name.
- Adding or removing licence activity.
- Fee category changes.

To aid the above the following measures will be implemented:

- Conducting regular reviews of its money laundering and terrorist financing risk assessment taking into consideration guidelines published by the GC from time to time.
- Assessing lottery transactions to identify any suspicious patterns and behaviour.
- Ensuring records are maintained of customer interaction which will include:
 - Identification – what the supporter was doing to prompt the interaction.
 - Interaction – what was said or done.
 - Evaluation – what happened next so Working Families can understand the impact and effectiveness of the actions and the approach so it can review the process if needed.

Returns

It is a condition of Working Families Gambling Commission operating licence or Local Authority registration that returns be made within 3 months of the draw of the lottery. The information that must be included on the lottery return is as follows:

- The date on which tickets were available for sale or supply and the date of the draw.
- The total proceeds of the lottery
- The amounts deducted by promoters of the lottery in providing prizes, including roll-overs.
- The amounts deducted by the promoters of the lottery in respect of costs incurred in organising the lottery.
- The amount applied directly to the purpose(s) for which the promoting society is conducted (at least 20% of the gross proceeds)

- Whether any expenses incurred in connection with the lottery were not paid for by deduction from the proceeds, and, if so, the amount of expenses and the source(s) from which they were paid.

It is also a condition of Working Families Gambling Commission operating licence that annual regulatory returns are submitted within 42 days of the end of each annual period. The information that must be included on the regulatory lottery return is as follows:

- Workforce information
- Contributions
- Operational events
- ELM Information

All accounting records, lottery returns, regulatory returns and reporting outcomes will be retained for a minimum of 3 years.

TRAINING

These Lotteries Policies and Procedures will be reviewed and updated every six months in line with LCCP revisions. All relevant staff are required to read these policies before they start working on Working Families Lotteries, and when they are updated. All staff are required to sign a document to confirm that they have received this training. These training records will be held for 3 years.

COMPLIANCE

The promoter of this Working Families Weekly Lottery is Working Families, Three Keys House, 130 Wood St, London, EC2V 6DL. Registered Charity Number 1099808 (England & Wales), SC045339 in Scotland.

Working Families is registered with City of London to operate this lottery under registration number 24/01133/GASSLN.

Responsible Person: Jane van Zyl, CEO of Working Families

VERSION CONTROL TABLE

Version No.	Detail of change / sign off	Author Name /	Position	Date
0.1	First edition	Jane van Zyl	CEO	19.03.24