

Social Responsibility in Gambling Policy

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| Title | Social Responsibility In Gambling Policy | |
| Author/Owner | Simon Judd | |
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| Linked procedural documents | Self-exclusion process | |
| Document applicable to | Charity and Trading Subsidiary All staff, Trustees and volunteers | |

Advertising and marketing of gambling products

All advertising and marketing material produced by East Anglian Air Ambulance (and its trading subsidiary) must comply with the Gambling Act 2005, and all other subsequent statutory orders and amendments. This procedure applies to all printed marketing material, and all virtual electronic media content, including websites, social media content, and mobile telephone application content.

1. All marketing material, pages involving direct sign up, or pages requesting further information, irrespective of the nature of the media, must contain the following on, or within one click of, the main body of the material:
 - a. The name of the promoting society (East Anglian Air Ambulance).
 - b. The price of the ticket for the relevant lottery.
 - c. The name and address of the member of the charity responsible for the promotion of the lottery. (Responsible persons <Insert one or two of the registered Annex A holders>, Helimed House, Hangar 14, Gambling Close, Norwich NR6 6EG).
 - d. The date of the relevant draw (every Friday).
 - e. The fact that the Charity is licensed by the Gambling Commission, licence number 3319.
 - f. The Gambling Commission website www.gamblingcommission.gov.uk. In the case of electronic media, it must be possible for the purchaser of the ticket to retain or print a document that contains all of the above.
 - g. All exclusions, significant conditions or limitations and eligibility restrictions.
2. All advertisements must also comply with Broadcast Advertising (BCAP Code) and Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code) advertising guidelines, and these guidelines should be consulted before proceeding with any advertising material.
3. Communications will not be exploitative in anyway, including but not limited to avoiding exploitation due to; addiction, cultural beliefs, emotional difficulties, mental health difficulties, self-esteem (loneliness or attractiveness) issues or financial difficulties.
4. East Anglian Air Ambulance lottery advertising materials will not encourage antisocial or irresponsible behaviour or prioritisation in any way.
5. Promotional material will not be designed to appeal to persons under the age of 18 years of age.
6. No images of young people who are, or appear to be, under 25 years of age playing the lottery will be used in any advertising material, unless that material exclusively features the good cause benefits and does not include any explicit encouragement to buy a lottery product.
7. Prizes that specifically target younger people under 25 years of age such as video games, theme park tickets or certain music concerts will not be offered as incentives or prizes.
8. All email promotions will be sent in line with General Data Protection Regulation (GDPR) and Privacy and Electronic Communications Regulations (PECR) guidance, as well as specific Data Protection Agreements where necessary. Any such communication will include an unsubscribe link.

9. East Anglian Air Ambulance (Trading) Ltd will use The Infringing Website List (IWL) to ensure that digital adverts placed by ourselves or third parties are not placed on websites providing unauthorised access to copyrighted content. Any lottery-related adverts must not be placed with or by third parties where editorial control of content cannot be guaranteed.

These stipulations apply to material produced and hosted by the Charity, and all linked websites. The requirements are to be shared with and adhered to by internal marketers and third party agencies. All content must be agreed by the Annex A holder responsible for Marketing and Commercial Development, before publication.

Contribution to research, education and treatment

East Anglian Air Ambulance (Trading) Ltd is a member of The Lotteries Council. The Council makes an annual donation to the Responsible Gambling Trust on behalf of its members.

Information for players

Information for players is detailed in the East Anglian Air Ambulance Lottery Terms and Conditions.

The Terms and Conditions ensure that our rules are clear, fair, agreed, public and readily available.

1. East Anglian Air Ambulance (Trading) Ltd ensure that these terms and conditions are readily available by:
 - a. Publishing the Terms and Conditions in the public domain in a clear location on the East Anglian Air Ambulance website.
 - b. Including a link to the Terms and Conditions on relevant web pages and promotional material.
 - c. Specifying the location of the Terms and Conditions in registration documents.
 - d. The Terms and Conditions will be supplied in print on request.
2. East Anglian Air Ambulance (Trading) Ltd conducts a fair lottery by:
 - a. Providing players with access to clear information on matters such as the rules of the lottery.
 - b. Conducting all draws at the Norwich office of East Anglian Air Ambulance in plain sight of authorised staff and using a Gambling Commission authorised random number generator.
 - c. Specifying the prizes that are available and the chances of winning on our website and, where possible, promotional material.
 - d. Publishing the results on our website and sending them directly to members on request.
 - e. Operating and publishing a clear complaints procedure as a product and as an organisation.
 - f. Operating a social responsibility policy that ensures that any advertising and promotional material is clear and not misleading.

Preventing underage gambling and protecting vulnerable persons

To comply with Social responsibility code provision 3.2.11 and Ordinary code provision 3.2.12, East Anglian Air Ambulance (Trading) Ltd require confirmation that all society lottery players are 18 and over. East Anglian Air Ambulance (Trading) Ltd will not permit vulnerable people or any person under the age of 18 to participate in a lottery or any other form of gambling.

East Anglian Air Ambulance (Trading) Ltd has implemented the following procedures to ensure that its lottery does not attract children under the age of 18:

1. To avoid targeted young people via marketing material:
 - a. Any cold data used to promote the lottery is screened to prevent any persons under the age of 18 being sent lottery / raffle information.
 - b. Any personal data used for lottery mailings will be screened to exclude persons under the age of 18.
 - c. Promotions will not run on channels specifically targeted at young people.
2. The age of players will be verified by the following means:
 - a. Third party canvassers: Tower lotteries do not approach anyone who appears to be under the age of 21.
 - b. Some follow up calls are made by the charity which as well as quality control will also collect date of birth so that we can provide a sample of age-verified supporters
 - c. Other payment/registration methods: For debit card and non-canvasser registered East Anglian Air Ambulance lottery players, random spot checks will be carried out monthly. Ten players will be checked each month using the Experian Bank Wizard system.
3. The methodology adopted in order to establish whether or not a potential or actual customer is over 18 years old will be reviewed on an annual basis, and all reasonable improvements that may become available as technology advances and as information improves will be implemented.
4. If a person enters the East Anglian Air Ambulance lottery stating that they are over the age of 18 years and subsequently it is found that they are less than 18 years of age, they will be notified by phone or post, have any money paid in relation to the lottery returned to them and where relevant will automatically forfeit the right to any prize.
5. To ensure that the law has been explicitly outlined and that players confirm their age, all East Anglian Air Ambulance lottery registration forms are required to carry the explicit warning: "Tick here to confirm you are 18 or over. Please note that it is an offence to gamble underage."
6. East Anglian Air Ambulance (Trading) Ltd provides contact details or links on all lottery websites or via other appropriate media to Gamble Aware and other relevant organisations.
7. All East Anglian Air Ambulance staff members and third party staff that promote or administer the East Anglian Air Ambulance lottery have signed acknowledgement of the age verification procedure.
8. Canvassers employed by external companies 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.

Problem Gambling & Self-exclusion

East Anglian Air Ambulance (Trading) Ltd has put in place the following procedures to encourage people to gamble responsibly and seek help should gambling become a problem:

1. All membership tickets dispatched to members are numbered and recorded. Any players with more than 20 plays per week are contacted by the charity for verification.
2. East Anglian Air Ambulance (Trading) Ltd will include the contact details of support organisations on its lottery website and, where possible, promotional material. Further information about problem gambling is set out below, and in our Terms and Conditions.
3. If self-exclusion is requested, we will close any player's lottery membership(s) for a minimum period of six months during which time the membership(s) cannot be reinstated. During this period, the lottery system will ensure that the individual does not open a new membership by referencing their postcode and surname.
4. If East Anglian Air Ambulance (Trading) Ltd is made aware of an application to participate in the lottery from a person that has previously excluded themselves from participating in gambling, or is a suspected problem gambler, the application will be rejected and current

entries removed. The prospective customer will be advised in writing of the reasons for the rejection and referred to GamCare. The customer's details will be logged in the charity's database for the purposes of possible exclusion from future participation in the lottery.

5. Communication between East Anglian Air Ambulance (Trading) Ltd and any customer that self-excludes from gambling will be conducted as per the Self-exclusion Process.

If you have any questions about this policy, please contact the East Anglian Air Ambulance (Trading) Ltd responsible person for gambling at:

e/ info@eaaa.org.uk

t/ 03450 669 999

a/ East Anglian Air Ambulance, Helimed House, Hangar 14, Gambling Close, Norwich Airport, Norwich, NR6 6EG