

Responsible gambling policy

East Anglian Air Ambulance is committed to fundraising responsibly and we also encourage responsible gambling. East Anglian Air Ambulance runs a lottery for the general public for the sole purpose of raising funds for the registered charity 1083876. East Anglian Air Ambulance is committed to ensuring that our 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:

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 the East Anglian Air Ambulance policies and to ensure 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:

- 1.1. The individual is aged 16 or over.
- 1.2. The individual is resident in the UK.
- 1.3. We retain the right to cancel any membership should we suspect criminal activity.
- 1.4. We limit the maximum number of entries to £20 per person per week. All members wishing to have 10 or more entries per week are contacted by a member of the lottery team.
- 1.5. All lottery related computers and software are password protected and accessible only by authorised members of staff.
- 1.6. A strict and thorough reporting procedure is in place if a member of staff and / or another operator is found to be in any way operating in an illegal or suspicious manner.

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

We will ensure that:

- 2.1. 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.
- 2.2. All draws are conducted at the Norwich office of the East Anglian Air Ambulance in plain sight of staff and using a random number generator.
- 2.3. The rules are fair.
- 2.4. Any advertising and promotional material is clear and not misleading.

- 2.5. Winners' results are published on our website or sent directly to members on request.
- 2.6. We have a complaints procedure in place.

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

East Anglian Air Ambulance will not permit vulnerable people or any person under the age of 16 to participate in a lottery or any other form of gambling. East Anglian Air Ambulance has implemented the following procedures to ensure that its lottery does not attract children under the age of 16:

- 3.1. Any cold data used to promote the lottery is screened to prevent any persons under the age of 16 being sent lottery / raffle information.
- 3.2. Any personal data used for lottery mailings will be screened to exclude persons under the age of 16.
- 3.3. All lottery tickets issued state that lottery membership is only available to persons over the age of 16.
- 3.4. Any entrants recruited to the lottery are asked to confirm that they are over the age of 16.
- 3.5. If a person enters East Anglian Air Ambulance Lottery stating that they are over the age of 16 years and subsequently it is found that they are less than 16 years of age, they will have any money paid in relation to the Lottery returned to them and where relevant will automatically forfeit the right to any prize.
- 3.6. We will review on an annual basis the methodology adopted in order to establish whether or not a potential or actual customer is over 16 years old and will implement all reasonable improvements that may become available as technology advances and as information improves.
- 3.7. Vulnerable persons – Canvassers employed by an external company [Engage People] 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.

4. Responsible Gambling

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

- 4.1. All membership tickets dispatched to members are numbered, recorded, and monitored.
- 4.2. Self exclusion – On request, 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 we will also try and ensure that the individual does not try and open a new membership.
- 4.3. East Anglian Air Ambulance is a member of The Lotteries Council, an umbrella body which promotes the interests of organisations running lotteries for fundraising and which makes an annual donation to the Responsible Gambling Trust on behalf of its members.
- 4.4. East Anglian Air Ambulance will take legal steps to ensure that information relating to responsible gambling is available to individuals, such as including the contact details of support organisations on its lottery website. Further information about problem gambling is set out below.

5. Problem Gambling

Whilst the majority of people do gamble within their means, for some gambling can become a problem. It may help you to keep in control to remember the following:

- 5.1. Gambling should be entertaining and not seen as a way of making money.
- 5.2. Avoid chasing losses.
- 5.3. Only gamble what you can afford to lose.
- 5.4. Keep track of the time and amount you spend gambling.
- 5.5. If you need to talk to someone about problem gambling then contact GamCare. GamCare is a registered charity that provides confidential telephone support and counselling to anyone who is affected by problem gambling. GamCare can be contacted confidentially on their helpline on 0845 6000 133. You can also visit the GamCare website for more information and advice.
www.gamcare.org.uk

East Anglian Air Ambulance will endeavour to ensure it identifies and reacts to any suspected problem gamblers.

If an existing customer self excludes from gambling:

- 5.6. East Anglian Air Ambulance will ensure that any person who has asked to be suppressed from lottery mailings is not contacted by East Anglian Air Ambulance for these purposes. All selfexcluders will be removed from any gambling related marketing databases within two working days of the East Anglian Air Ambulance receiving the completed self exclusion notification and will be excluded for a minimum of six months.
- 5.7. Any memberships held by the self excluder in the lottery scheme will be cancelled immediately, in such a way as to ensure that no further future credit is spent.
- 5.8. Any advance payments applicable to the lottery scheme will be refunded by East Anglian Air Ambulance at the earliest opportunity.
- 5.9. All communication between staff and self excluders or suspected problem gamblers will be recorded in writing and monitored and approved by the Lottery Manager.

If East Anglian Air Ambulance receives an application to participate in the Lottery from a person who has previously advised that they have excluded themselves from participating in gambling, the application will be rejected. The prospective customer will be advised in writing of the reasons for the rejection and referred to GamCare.

If East Anglian Air Ambulance receives an application to participate in its lottery from a suspected problem gambler, the customer will be referred to GamCare. The customer's details will be logged in the Lottery database for the purposes of possible exclusion from future participation in the Lottery.

If an existing customer was suspected of becoming a problem gambler any request for any additional entries in the Lottery will be refused. The customer will also be referred to GamCare and the customer's details will be suppressed and will be excluded from lottery participation and mailings.

6. Social responsibility in gambling – ensuring marketing compliance

All advertising and marketing material produced by East Anglian Air Ambulance 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 internet websites, social media content, and mobile telephone application content.

All marketing material, irrespective of the nature of the media, must contain the following:

- 6.1. The name of the promoting society (Friends of East Anglian Air Ambulance).
- 6.2. The price of the ticket for the relevant lottery.
- 6.3. The name and address of the member of the charity responsible for the promotion of the lottery. (Responsible person M.Burt, Hangar E, Gambling Close, Norwich NR6 6EG).
- 6.4. The date of the relevant draw (every Friday).
- 6.5. The fact that the Charity is *licensed by the Gambling Commission*.
- 6.6. 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.

All advertisements must also comply with [BCAP](#) and [CAP](#) advertising guidelines, and these guidelines should be consulted before proceeding with any advertising material.

No young person who is, or appears to be, under 25 years of age should 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.

No digital advertisements must appear on websites that provide unauthorised access to digital content, and any lottery-related adverts must not be placed with or by third parties where editorial control of content cannot be guaranteed.

7. Promotion of the Lottery by website/social media

As it is an offence to sell tickets to under 16's, any society must ensure that sale of remote chances does not inadvertently target or recruit lottery players using this media. Prizes that specifically target younger people under 25 years of age such as video games, theme park tickets or certain music concerts must not be offered as incentives or prizes.

In addition, it is vital that the customer must have access to relevant information, on each individual webpage, email, or other electronic communication.

In the case of a social media post or tweet, where space may be limited, the first landing page linked to the post/tweet must contain all six mandatory pieces of information.

It is also further advisable in the interests of transparency that this information appears on all subsequent lottery related web pages.

Any pages involving direct sign up, or requests for further information, must contain full lottery and promoting society details.

This stipulation applies to the website of the Charity, and all linked websites. However, all content must be agreed by the Annex A holder responsible for Marketing and Commercial Development, before publication. Responsible person M.Burt, Hangar E, Gambling Close, Norwich NR6 6EG.