East Anglian Air Ambulance Trading Ltd

CASH HANDLING, ANTI-MONEY LAUNDERING AND FINANCIAL CRIME POLICY (LOTTERY)

Version 6.0

Owner	Head of Individual Giving and Supporter Engagement	
Approved by	Annex A Responsible Persons	Date: July 2026 (v6.0)
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3.0	December 2021	Simon Judd
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6.0	July 2026	Simon Judd
Document summary		
Review date	Every 3 years and as required with changes to policies, procedures and legislation	
Linked procedural documents	EAAA Weekly Lottery Terms and Conditions EAAA Responsible Gambling Policy EAAA Complaints Policy EAAA Privacy Policy	
Document applicable to	Charity and Trading Subsidiary. All staff, Trustees and volunteers	

1. Purpose

1.1. This policy sets out the controls, procedures and responsibilities adopted by East Anglian Air Ambulance (Trading) Ltd ("EAAA") to prevent its lottery operations from being used for money laundering, terrorist financing, fraud or other forms of financial crime.

1.2. The policy supports compliance with:

- The Gambling Act 2005;
- The Proceeds of Crime Act 2002;
- The Terrorism Act 2000;
- Gambling Commission Licence Conditions and Codes of Practice (LCCP);
- Relevant Gambling Commission guidance regarding financial crime prevention.

1.3. The EAAA Weekly Lottery is a low-risk gambling product, however proportionate controls are required to ensure that the lottery cannot be used to facilitate criminal activity.

2. Scope

2.1. This policy applies to:

- All EAAA lottery staff;
- Trustees;
- Volunteers involved in lottery administration;
- Third-party contractors acting on behalf of EAAA in relation to lottery operations.

2.2. The policy covers:

- Cash handling;
- Customer payments;
- Customer funds;
- Anti-money laundering controls;
- Terrorist financing prevention;
- Fraud prevention;
- Suspicious Activity Reporting (SAR);
- Financial crime governance.

3. Anti-Money Laundering and Financial Crime Commitment

3.1. EAAA is committed to preventing its lottery operations from being used to facilitate:

- Money laundering;
- Terrorist financing;
- Fraud;

- Criminal property offences;
- Any other form of financial crime.

3.2. EAAA will take reasonable and proportionate steps to:

- Prevent criminal activity;
- Detect suspicious behaviour;
- Investigate concerns;
- Report suspicious activity where appropriate;
- Cooperate with law enforcement and regulatory authorities.

3.3. All staff have a responsibility to remain alert to indicators of financial crime and to report concerns immediately.

4. Responsibilities

4.1. The Gambling Commission Responsible Persons are responsible for:

- Oversight of financial crime controls;
- Review of suspicious activity reports;
- Escalation of concerns to external agencies where appropriate;
- Approval of risk assessments;
- Periodic review of this policy;
- Monitoring compliance with Gambling Commission requirements.

4.2. Staff Responsibilities - Staff and volunteers involved in lottery administration must:

- Follow this policy;
- Remain vigilant to suspicious activity;
- Escalate concerns immediately;
- Complete required training;
- Maintain confidentiality regarding investigations.

5. Financial Crime Risk Assessment

5.1. The risk of financial crime is assessed as low due to:

- Low-value weekly lottery subscriptions;
- Random allocation of prizes;
- Limited opportunities for customers to recover funds;
- Strict payment controls;
- Independent witnessing of lottery draws.

5.2. Financial crime risks will be reviewed:

- At least annually;
- At quarterly compliance meetings;
- Following regulatory changes;

- Following any significant operational changes;
- Prior to the introduction of new products, technologies or sales channels.

5.3. Findings and actions will be documented and retained.

6. Detection of Financial Crime

6.1. Customer Participation Monitoring - The lottery system is configured to identify customers requesting participation levels above established limits.

6.2. Current entry limits are:

- Maximum 20 weekly entries through recurring Direct Debit;
- Maximum 50 entries through one-off purchases.

6.3. Where unusually high participation is identified, a member of staff will review the account and refer any concerns to a Responsible Person.

6.4. Examples of potentially suspicious activity may include:

- Requests to purchase unusually large numbers of lottery entries;
- Use of multiple bank accounts for payment;
- Frequent payment failures followed by rapid alternative payment attempts;
- Requests for refunds shortly after payment;
- Use of a third-party payment source;
- Provision of inconsistent personal information;
- Unusual urgency surrounding prize payments;
- Attempts to circumvent lottery purchase limits;
- Any behaviour suggesting the lottery is not being used for genuine recreational participation.

6.5. The presence of one indicator does not necessarily indicate criminal activity but must be reviewed appropriately.

6.6. Anonymous participation is not permitted. Players must provide sufficient personal information to allow administration of their membership and verification where required. Applications containing incomplete, false or misleading information may be rejected or suspended pending investigation.

6.7. Any indication that a person is purchasing lottery entries on behalf of another individual in order to circumvent self-exclusion controls, participation limits or regulatory restrictions will be treated as suspicious activity and investigated.

7. Suspicious Activity Reporting

7.1. Internal Reporting – Any staff member or volunteer who becomes aware of suspicious activity must report the matter immediately to a Responsible Person.

7.2. Investigation - The Responsible Person will:

- Review available information;
- Determine whether legitimate explanations exist;

- Record findings;
- Decide whether external reporting is required.

7.3. National Crime Agency Reporting - Where appropriate, a Suspicious Activity Report (SAR) will be submitted to the National Crime Agency (NCA).

7.4. Tipping Off - Staff must not inform customers that:

- A SAR has been submitted;
- A SAR is being considered;
- An investigation is taking place.

8. Terrorist Financing and Financial Sanctions

8.1. EAAA recognises that gambling products may be targeted for terrorist financing activities, although the risk within the charity lottery sector remains low.

8.2. Any suspicion that lottery participation may be linked to:

- Terrorist financing;
- Organised crime;
- Individuals or organisations subject to financial sanctions;

must be escalated immediately to a Responsible Person.

8.3. Appropriate action will be taken in accordance with legal and regulatory requirements.

9. Prevention Controls

9.1. Lottery Draw Integrity - Each lottery draw:

- Uses a computerised random number generator;
- Is independently witnessed;
- Is documented and recorded.

9.2. Segregation of Duties

Administration activities are separated where reasonably practicable to reduce the risk of internal fraud.

9.3. Staff Vetting

EAAA may undertake appropriate pre-employment checks, including DBS checks where relevant to the role.

9.4. Third-Party Agents

Third-party agents acting on behalf of EAAA are not permitted to process cash payments unless expressly authorised under documented procedures.

9.5. Prevention Controls

EAAA will undertake proportionate due diligence on suppliers and third-party service providers involved in the operation of the lottery. This may include verification of company information, ownership structures, directors, persons with significant control and regulatory standing. Material changes identified during the supplier relationship will be reviewed and escalated where necessary.

10. Payment Processing

10.1. EAAA Weekly Lottery participation is restricted to eligible individuals resident in Great Britain. Applications originating from outside Great Britain, including Northern Ireland, the Isle of Man and the Channel Islands, will not be accepted. Any application identified as ineligible will be declined.

10.2. Payment by Cheque

10.2.1. Cheques should normally be received with a lottery application form or renewal documentation.

10.2.2. Where documentation becomes separated, reasonable steps must be taken to verify ownership before processing.

10.2.3. Banking should be completed in accordance with Finance Department procedures.

10.2.4. Records must be maintained of:

- Date banked;
- Customer name;
- Amount received;
- Lottery membership reference.

10.3. Payment by Direct Debit

10.3.1. Direct Debits will be administered in accordance with BACS requirements and the Direct Debit Guarantee.

10.3.2. All Direct Debit mandates must include a unique lottery membership reference.

10.3.3. Paperless Direct Debit instructions may only be processed by appropriately trained and authorised individuals.

10.3.4. Customers are entered into lottery draws only where sufficient cleared funds are available on their account.

10.3.5. Advance payments remain the property of the player until used for lottery participation or refunded.

10.4. Payment by Debit Card

10.4.1. Debit card payments may be processed through approved payment service providers.

10.4.2. Debit card information is not stored by EAAA.

10.4.3. EAAA maintains compliance with applicable PCI DSS requirements.

10.5. Credit Cards

10.5.1. Credit card payments are not accepted for participation in the EAAA Weekly Lottery.

10.6. Standing Orders

10.6.1. Players may establish standing orders using information provided by EAAA.

10.6.2. The player is responsible for establishing and cancelling any standing order instruction with their bank.

10.6.3. EAAA should also be notified where a standing order is cancelled.

10.7. Payment of refunds and/or winnings

10.7.1. Requests to pay winnings or refunds to an individual who is not the registered lottery member, or to an account inconsistent with information held on record, may be refused and referred for review by a Responsible Person.

10.8. Payment processors

10.8.1. Approved payment processors must maintain appropriate financial crime controls, fraud controls and regulatory compliance standards. EAAA will periodically review arrangements with payment providers to ensure risks remain appropriately managed.

11. Customer Funds and Insolvency Protection

11.1. Advance Payments

11.1.1. Payments received in advance are accounted for and reconciled against lottery records and bank accounts on a regular basis.

11.2. Customer Funds Protection

11.2.1. Customer funds are held within a bank account controlled by East Anglian Air Ambulance and separate from the trading subsidiary.

11.2.2. Trustees have determined that these funds are ring-fenced and are not used as working capital.

11.2.3. This means that steps have been taken to protect customer funds but there is no absolute guarantee that all funds would be repaid in the event of insolvency.

11.2.4. This meets the Gambling Commission's customer funds disclosure requirements at the level of: Medium Protection

11.3. No Customer Credit

11.3.1. No credit is granted to individual customers.

11.3.2. Customers are only entered into lottery draws where sufficient cleared funds have been received.

11.4. Approved Lottery Agents

11.4.1. A limited number of approved lottery agents may be granted up to four weeks' credit under separate documented arrangements and subject to monitoring.

12. Record Keeping

12.1. The following records will be retained in accordance with EAAA retention schedules:

- Customer payment records;
- Refund records;
- Lottery participation records;
- Financial crime investigations;
- SAR decisions;
- Compliance reviews;
- Training records.

12.2. Records must be retained securely and only accessed by authorised individuals.

13. Training and Awareness

13.1. Staff involved in lottery operations will receive training appropriate to their role.

13.2. Training may include:

- Anti-money laundering awareness;
- Financial crime risks;
- Responsible gambling responsibilities;
- Customer interaction requirements;
- Suspicious activity identification;
- Escalation procedures.

13.3. Training records will be maintained by EAAA.

14. Policy Monitoring and Review

14.1. Compliance with this policy will be monitored through:

- Quarterly compliance meetings;
- Internal audits;
- Operational reviews;
- Incident reporting processes.

14.2. This policy will be reviewed:

- Every three years;
- Following regulatory changes;
- Following significant operational changes;
- Following any material financial crime incident.

14.3. The Responsible Persons will monitor lottery sales levels and ensure any Gambling Commission reporting, auditing or certification requirements triggered by sales thresholds are completed within required timescales.