

RSPB Lotteries Policy & Procedure

RSPB Licences

- Operating Licence number 000-004704-N-303936-014
- Remote Operating Licence number 000-004704-R-306603-014

External Lottery Manager: Woods Group Limited

This document contains the RSPB remote and non-remote gambling policies. These policies are a requirement for maintaining a Society Lottery Operating Licence from the Gambling Commission. The RSPB is licensed by the Gambling Commission to promote its Quarterly Lottery and Weekly Direct Debit lottery product.

All employees and any contractors or agents associated with RSPB lotteries operation will be made aware of the policies and procedures contained in this document. Any contractors and agents will be contractually obliged to operate in accordance with them.

If anyone at the RSPB wishes to operate any sort of gambling activity not covered in these policies, or one that requires a change to these policies, they must first seek the approval of the registered promoter: Joanna Coker, Deputy Director Supporter Development who is registered with the Gambling Commission.

Policy

This policy is compulsory. It sets out our non-remote and remote gambling policies, which are based on The Gambling Commission's Licence Conditions and Codes of Practice (LCCP), dated May 2019, under the Gambling Act 2005.

Gambling Policy & Procedure

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1. Introduction

- 1.1. The RSPB will alter this policy to reflect any future changes to the Gambling Commission's Licence Conditions and Codes of Practice provisions.
- 1.2. Policies are provided in relation to:
 - (a) general policy statements
 - (b) protection of the business from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
 - (c) ensuring that children and other vulnerable persons will be protected from being harmed or exploited by gambling
 - (d) the promotion of socially responsible gambling
 - (e) ensuring that gambling is conducted in a fair and open way
 - (f) access to premises
 - (g) information requirements
 - (h) marketing
 - (i) complaints and disputes.

2. General policy statements

- 2.1. General
 - 2.1.1. The RSPB will operate its lottery business in accordance with the Gambling Act 2005.
 - 2.1.2. The RSPB will run lotteries that comply with the general licence conditions and associated codes of practice (Licence Conditions and Codes of Practice) attached to the RSPB's lottery operating licence, as issued by the Gambling Commission pursuant to Section 75 of the Gambling Act 2005.
 - 2.1.3. The RSPB will comply with the Gambling Commission's technical standards and with requirements set by the Gambling Commission relating to the timing and procedures for testing.
 - 2.1.4. The RSPB'S Fraud and Money Laundering Policy and Response Plan, together with the RSPB's Anti-Bribery Policy are available on request if required.

2.2. Small-scale operator status

- 2.2.1. The RSPB will operate as a small-scale operator, as defined in the Gambling Act 2005 (Definition of Small-Scale Operator) Regulations 2006.
- 2.2.2. Any changes required to the list of employees whose details and responsibilities have previously been provided to the Gambling Commission in relation to the operating licence (as in those qualifying persons actually named on RSPB operating licences) will be provided in writing by Joanna Coker to the Commission, no later than 28 days after the change has occurred.
- 2.2.3. Changes to registered address, trading name, equipment type used will be provided in writing to the commission within 28 days.

2.3. Cash handling

- 2.3.1. The RSPB and any contractors will:
 - (a) ensure that access to any building used for lottery administration purposes is controlled.
 - (b) further ensure that access to any area within the building that is used either for lottery administration purposes or for storage of lottery-related records is also controlled.
- 2.3.2. All staff will, whenever and wherever possible, ensure that customers' personal details, customers' debit/credit card details and customers' bank account details are stored as safely and securely as possible.
- 2.3.3. The RSPB will ensure that all lottery correspondence is opened in full view of at least one other employee.
- 2.3.4. All cash and cash equivalents inclusive of bankers' drafts, cheques, postal orders, debit/credit card details and bank account details shall be handled in the company of other members of staff. They shall also be stored out of sight as safely and securely as possible prior to processing and shall be stored overnight in an office safe, once processed.
- 2.3.5. All debit/credit card numbers will be erased using permanent marker pens once the debit/credit card transaction has been successfully processed, prior to long-term storage in a secure storage area. CVV/debit/credit card security numbers will not be requested via RSPB paper-based application forms.
- 2.3.6. All banking will be re-counted and cross-checked against the relevant lottery administration paperwork, for lottery banking purposes.

2.4. General 'fair and open' provisions

- 2.4.1. The RSPB will ensure that:
 - (a) the terms upon which gambling is offered comply with the fairness and transparency requirements under the Consumer Rights Act 2015 and

where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977

- (b) the rules (any other terms and/or consumer notices) for each lottery are made available to customers in an easily accessible way and set out in plain and intelligible language see Appendix 1: Rules
- (c) ticket holders will be notified of changes to the terms before they come into effect, and any such changes shall comply with the fairness and transparency requirements under the Consumer Rights Act 2015
- (d) it does not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008, at any stage of interactions with consumers

2.5. Display of licensed status

The RSPB will ensure that “licensed by the Gambling Commission” and details of the Gambling Commission’s website (www.gamblingcommission.gov.uk) are printed on all lottery tickets.

2.6. Lotteries

The RSPB will ensure that all of its lottery schemes will be operated specifically in accordance with The Gambling Commission’s Licence Conditions and Codes of Practice (LCCP), dated May 2019.

3. Protection of the business from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime

3.1. Lottery schemes

The RSPB will refuse to be associated with any proposed lottery scheme or other gambling activity that may breach the law.

3.2. Contractors/agents/ suppliers

3.2.1. RSPB will refuse to contract with any contractors or agents who RSPB suspects may be associated with any potential or actual criminal activities.

3.2.2. RSPB will only use suppliers who are licensed by the Gambling Commission (External Lottery Managers), to run all or part of RSPB's own lottery business.

3.2.3. RSPB must ensure that any supplier, contractor or agent will conduct themselves when carrying out the activity on the RSPB's behalf, as if they were bound by the same License Conditions and Codes of Practice as the RSPB.

3.2.4. RSPB will require all contractors, agents or suppliers to:

- (a) obtain references from all prospective employees and self-employed agents that are likely to be associated with RSPB gambling business.
- (b) monitor their staff and self-employed agents on an ongoing basis, particularly regarding their direct or indirect association with potential criminal activities.
- (c) provide the RSPB with information as reasonably required to fulfill our reporting obligations or any other obligations to the Gambling Commission.

3.2.5. RSPB will only use gambling software (a Random Number Generator (RNG)) produced by suppliers who have been licensed by the Gambling Commission to manufacture, supply, install or adapt gambling software to promote a lottery.

3.2.6. If RSPB determines that user interfaces will be required in order to enable customers to directly access its gambling facilities remotely and the necessary software development work needs to be sub-contracted to a third party, then RSPB will include terms that state that any such user interface shall comply with the Gambling Commission's technical standards for remote gambling systems and which also enable the RSPB, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the RSPB's reasonable opinion, the third party is in breach of that term.

3.2.7. RSPB shall, subject to compliance with any dispute resolution provisions of such contract, terminate a third party's contract promptly if, in the RSPB's reasonable opinion, the third party is in breach of contract (including, in

particular, terms included pursuant to a code provision) or has otherwise acted in a manner which is inconsistent with the LCCP, including for affiliates where they have breached a relevant advertising code of practice.

3.3. RSPB employees/self-employed agents

- 3.3.1. RSPB will require references from all prospective employees and self-employed agents who are likely to be associated with RSPB gambling business. RSPB will maintain ongoing monitoring of all staff, particularly with a view to their direct or indirect association with potential criminal activities.
- 3.3.2. RSPB will ensure that it reports any actual or suspected criminal activities to the police.
- 3.3.3. RSPB Staff involved in promoting lotteries or selling lottery tickets face to face or via telephone will be trained to a satisfactory standard to ensure compliance with RSPB gambling policy and procedure.

3.4. Prospective customers/actual customers

- 3.4.1. RSPB will not enroll any person into any of its lottery schemes if that person is suspected of any potential or actual criminal activities.
- 3.4.2. RSPB will advise customers in writing of their weekly lottery membership status and procedures associated with lottery payments.
- 3.4.3. RSPB will ensure that it reports any actual or suspected criminal activities to the police.

4. Ensuring that children and other vulnerable people will be protected from being harmed or exploited by gambling

4.1. Children

- 4.1.1. RSPB will ensure that the lottery rules and any lottery marketing and promotional literature, including any lottery tickets, adequately and effectively advertise the minimum legal age limit. It will be clear within the terms and conditions that prizes will not be paid out to those found to be under 16.
- 4.1.2. RSPB must obtain and verify information in order to establish the identity of a customer; this information must include, but is not restricted to, customer's name, address and date of birth. It is RSPB's responsibility to ensure that the information collected remains accurate. RSPB will ensure that all forms of weekly lottery membership application (for example, paper or electronic lottery application forms, any door-to-door based recruitment, any telemarketing-based recruitment and any form of annual raffle-based invitation to purchase lottery tickets) contain:

(a) a request for the customer's name and address and date of birth

or

- (b) a declaration that the applicant must be 16 years old or over.
- 4.1.3. RSPB will review on an annual basis the methodology adopted in order to satisfactorily 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.
- 4.1.4. RSPB will not accept lottery entries from children who RSPB knows to be under 16 years old or suspect of being under 16 and cannot prove otherwise by producing acceptable identification documents such as a valid driving licence, passport or identity card. RSPB will explain that the operation of the lottery is covered by the Gambling Act 2005, which prevents any person under that age from taking part in any gambling activities. RSPB will refund in full any lottery subscriptions that may have been received.
- 4.1.5. It is a criminal offence to invite or allow a child under 16 years old to enter a lottery (other than certain classes of exempt lottery, such as incidental non-commercial lotteries, private lotteries, work lotteries and residents' lotteries). As such:
- (a) Any member of staff or any self-employed agent thought to have knowingly invited a child under the age of 16 to participate in any of the RSPB gambling activities will be managed in line with RSPB disciplinary policy.
- (b) Raffle ticket sellers and any other contractors must be advised accordingly.
- 4.1.6. If a child under 16 years old is found to have participated in a lottery after the lottery draw has taken place, then a full refund will be made to that person and any prizes that might otherwise have been due to them will not be paid out. If prizes have already been paid out, all reasonable attempts will be made to recover them.
- 4.2. Suspected problem gamblers
- 4.2.1. In the event that an application to participate in a lottery is received from a suspected problem gambler:
- (a) The customer must be tactfully referred to GamCare (see "Information on how to gamble responsibly and help for problem gamblers" later), by the appropriate lottery administrator/supervisor/manager.
- (b) The customer's details must be logged for the purposes of possible exclusion from future participation in future lotteries, should any similar incidents re-occur.
- (c) All written and verbal communication between staff and suspected problem gamblers must be monitored and approved by a lottery supervisor/manager.
- 4.2.2. In the event that an existing customer is suspected of becoming a problem gambler:

- (a) Any requests for any additional lottery entries/tickets in excess of the recommended maximums (see "Customer Interaction" later) must be tactfully refused.
- (b) The customer must be tactfully referred to GamCare, by the appropriate lottery administrator/supervisor/manager.
- (c) The customer's details must be logged for the purposes of possible exclusion from future participation in future lotteries, should any similar incidents re-occur.
- (d) All written and verbal communications between staff and the suspected problem gambler should be monitored and approved by a lottery supervisor/manager.

4.3. Self-excluders from gambling

- 4.3.1. Customers will be given the opportunity to self-exclude either by telephone or in writing. The GMSE, RAFF & LOTT suppressions will be added to these contacts' records on the RSPB Supporter System thus preventing any selection for any type of lotteries promotions. (RAFF means no raffle tickets ever. LOTT means no Lottery ask sent. GMSE means Gambling self-exclusion).
- 4.3.2. RSPB and Woods will ensure that procedures are implemented which are designed to identify separate accounts – for example, multiple weekly lottery entries held by the same individual, such that if an existing customer opts to self-exclude from gambling, they are excluded from all accounts.
- 4.3.3. RSPB will ensure that self-excluders from gambling:
 - (a) are given the opportunity either to self-exclude immediately without any cooling off period or to consider self-exclusion further – for example, in order to discuss with problem gambling groups such as GamCare
 - (b) are removed from any gambling related marketing campaigns that have not passed the final lasering of address details stage within two days of receiving the completed self-exclusion notification
 - (c) are excluded from all future gambling related activity or marketing of gambling related products.
 - (d) will not receive any future gambling-related marketing materials, unless after the minimum period of six months has expired, the customer has taken proven positive action in order to gamble responsibly again and has specifically agreed to accept such materials
 - (e) are given a one-day cooling off period before being allowed to begin gambling again, but only in the event that they choose not to renew the self-exclusion and make a positive request to begin gambling again, either by telephone or in person.

- 4.3.4. In the event that an application to participate in a lottery is received from a person who has previously advised RSPB that they have excluded themselves from participating in gambling:
- (a) The application will be rejected by the relevant lottery administrator/supervisor/manager and the prospective customer will be advised in writing of the reasons for the rejection and tactfully referred to GamCare.
 - (b) All written and verbal communication between staff and the self-excluder must be monitored and approved by a lottery supervisor/manager.
- 4.3.5. In the event that an existing customer self-excludes from gambling:
- (a) Any participation held by the self-excluder in RSPB weekly lottery scheme must be cancelled immediately.
 - (b) Any advance payments made to RSPB weekly lottery scheme must be refunded at the earliest opportunity.
 - (c) All written and verbal communication between staff and the self-excluder must be monitored and approved by a lottery supervisor / manager.

4.4. Other vulnerable people

- 4.4.1. The RSPB is committed to ensuring that lottery tickets are not knowingly sold to other vulnerable people such as someone under the influence of alcohol or drugs, or someone who is incoherent, or suffering from dementia or Alzheimer's disease etc.
- 4.4.2. The RSPB will politely refuse to accept any new or subsequent lottery entries from people who have been discovered to be vulnerable or are suspected of being vulnerable, typically by recommending that the customer speaks with a carer or family member, before proceeding with the gambling transaction.
- 4.4.3. The RSPB will monitor any ongoing communications with customers in order to try and detect whether a person's vulnerability becomes evident, such that the customer's weekly lottery membership can be cancelled and any gambling-related future communications can be terminated.

5. **The promotion of socially responsible gambling**

5.1. Information on how to gamble responsibly and help for problem gamblers

- 5.1.1. RSPB is committed to ensuring that information about responsible gambling and accessing information and help in respect of problem gambling is readily available to all. The lottery rules and any lottery marketing and promotional literature, including any annual raffle-based invitation to purchase lottery tickets will, as far as is reasonably possible, advertise the GamCare logo, the GamCare Website and the GamCare National Helpline number (0808 8020 133), with the following supporting text:

"Are you gambling more than you really want to? If you feel you have a problem with gambling please visit GamCare's website for help and advice at www.gamcare.org.uk, or contact the GamCare National Helpline on 0808 8020 133. Lines open 8am to midnight."

- 5.1.2. GamCare is a registered charity and has become the leading authority on the provision of counselling, advice and practical help in addressing the social impact of gambling in the UK. GamCare takes a non-judgemental approach to gambling. They do not wish to restrict the choices or opportunities for anyone to operate or engage in gambling that are available legally and operated responsibly, but do strive to develop strategies that will:
- (a) improve understanding of the social impact of gambling
 - (b) promote a responsible approach to gambling
 - (c) address the needs of those adversely affected by a gambling dependency.
- 5.1.3. GamCare operates a national telephone helpline for anyone affected by a gambling problem and operates a network of both face-to-face and online counselling and support services. Additionally, GamCare works to support the development and implementation of responsible practice by the gambling industry.
- 5.1.4. RSPB and the External Lottery Manager(s) will ensure that all staff associated with the RSPB gambling business are made aware that advice is available to customers from GamCare regarding socially responsible gambling and gambling dependency.

5.2. Customer account information

- 5.2.1. Customer account information will be available for weekly lottery administration purposes, such that customer play and spending history can be monitored in order to enable RSPB to more easily identify potential problem gamblers.
- 5.2.2. RSPB will ensure that the ELM's procedures are implemented to identify separate accounts – for example, multiple weekly lottery entries held by the same individual, such that a customer may only hold one account in the weekly lottery (see also "Customer interaction").
- 5.2.3. Automated checks will be initiated:
- (a) on a weekly basis for weekly lottery administration purposes, such that customer interaction can be triggered in the event that any existing customer is discovered to hold more than 5 entries per draw
 - (b) on an as required basis prior to actually running any weekly lottery incorporating additional chances, such that customer interaction can be triggered in the event that any customer has purchased more than 50 additional chances in any weekly lottery scheme

- (c) on an as required basis prior to actually running any quarterly raffle scheme draw, such that customer interaction can be triggered in the event that any customer has purchased 10 or more books of 12 tickets.

5.3. Customer interaction

- 5.3.1. RSPB will initiate customer verification checks that are intended to ensure that the customer is aware of the level of gambling currently being undertaken, when approached by customers who:
 - (a) wish to take out more than 10 lottery entries per week in any weekly lottery scheme or wish to purchase 10 or more books of 12 lottery tickets in any quarterly raffle
 - (b) are suspected problem gamblers.
- 5.3.2. Customer verification checks will be completed by the appropriate lottery administrator/supervisor/manager, as determined by the relevant lottery supervisor/manager, in order to try and identify the reasoning behind the proposed gambling transaction. All communications must be treated with the utmost care and discretion, since a grateful supporter may simply be buying a large number of entries/tickets as a means of making a "donation" by way of the lottery/raffle and face-to-face or telephone communications are therefore preferred.
- 5.3.3. Once customer verification checks have been successfully completed, the lottery office supervisor/manager will determine whether or not to accept the abnormally high number of entries/tickets required by the prospective customer.
- 5.3.4. If the lottery office supervisor/manager decides to reject the prospective customer's application, then the prospective customer will be advised in writing of the limit imposed via the rules of the lottery scheme, which is adhered to for the purposes of supporting and maintaining RSPB's socially responsible approach towards gambling.
- 5.3.5. In the event that the prospective customer disputes the decision made by the lottery office supervisor/manager, then the decision will be referred to the responsible person within RSPB, whose decision shall be final.
- 5.3.6. Each initiation of the customer interaction policy will be logged by the RSPB in the RSPB Gambling Customer Interaction database for future Gambling Commission Annual Regulatory Returns reporting purposes.

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

- 6.1. All of RSPB lotteries will be conducted in accordance with a strict set of lottery rules, which will be approved on behalf of RSPB, by Claire Hoskins-Blount, designated responsible person. These rules will be permanently available to all prospective and actual lottery customers via RSPB website www.rspb.org.uk/lotteriesrules and will be provided in writing, upon request.

- 6.2. A player's guide to each gambling opportunity, such as the weekly lottery, will also be made available to customers via a number of different means, inclusive of but not limited to:
- (a) the RSPB website www.rspb.org.uk/raffle and www.rspb.org.uk/weeklylottery
 - (b) weekly lottery tickets, application forms, leaflets, door-to-door recruitment scripts, telemarketing scripts and new members welcome letters
 - (c) additional chances ask letters
 - (d) raffle tickets.
- 6.3. RSPB will notify its customers of changes to the terms and conditions – that is, the lottery rules associated with any Lottery before they come into effect
- 6.4. RSPB will use all reasonable endeavours to ensure that lottery entries, such as weekly lottery new member applications are processed promptly so that Direct Debit payments are collected at the soonest opportunity thus ensuring that new players are in the draw as promptly as possible, unless otherwise advised by a new player of a later start date. Should any issues arise with Direct Debit set up then customers will be contacted directly to resolve them.
- 6.5. RSPB will review standard written communications with the weekly lottery members typically on an annual basis, in order to ensure both their accuracy and effectiveness. RSPB will also informally monitor non-standard written communications and verbal communications between staff and lottery members.
- 6.6. RSPB will only use gambling software that incorporates a Random Number Generator (RNG) that has been proven to be random by a Gambling Commission- approved third party test house, in order to ensure that customers do not suffer unfair financial loss.
- 6.7. RSPB will ensure that any manual draws, such as quarterly raffle, are witnessed by at least one nominated representative, other than that person manually selecting the winning tickets.
- 6.8. Any possible disputes over winnings will be investigated by RSPB starting from the premise that "the customer is always right". The reputation of RSPB will always be a significant factor when making decisions under such circumstances.
- 6.9. The winning numbers associated with all of RSPB lottery draws will be published on the RSPB website www.rspb.org.uk/winners. Winning numbers will also be available by contacting RSPB Supporter Services.
- 6.10. The RSPB will not publish the names, residence of, or any other information relating to, the winners that can identify the individual. If such information is disclosed, the RSPB must inform the prize winner of their intention to publish and give the prizewinner the opportunity to object. The RSPB will publish winning ticket numbers and town so that customers can check once draws have taken place.

- 6.11. For customer interrogation purposes. winning numbers will also be posted out to winners (if specifically requested) for individual lottery draws.
- 6.12. Prize cheques will, where applicable, be posted out to winners as soon as is reasonably practical, in order to ensure that winners do not actually have to claim their prize in person.

7. Access to premises

- 7.1. RSPB will ensure that all employees and any contractors or agents associated with RSPB lottery business are made aware that:
 - (a) they must co-operate with the Gambling Commission's enforcement officers in the proper performance of their compliance functions
 - (b) the Gambling Commission's enforcement officers have rights of entry to premises, as contained in Part 15 of the Gambling Act 2005.

8. Information requirements

- 8.1. RSPB will make all reasonable efforts to ensure that the Gambling Commission is provided with any information that they know relates to or suspect may relate to an offence under the Gambling Act 2005, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.
- 8.2. RSPB will make all reasonable efforts to ensure that all key events that could have a significant impact upon the nature or structure of a licensee's business are notified to the Gambling Commission as soon as is reasonably practicable and in any event within five working days of the licensee becoming aware of the events' occurrence, inclusive of those key events specifically itemised within condition 15.2 of the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), dated May 2019 , concerning reporting key events, such as bankruptcy, unplanned change of auditor, any change to RSPB qualified person(s), disciplinary action against any qualified person(s).
- 8.3. RSPB will make available to the Gambling Commission such information as the commission may require about the use made of facilities provided in accordance with RSPB operating licences, the manner in which gambling authorised by the licence is provided and the manner in which the licensee's business in relation to that gambling is carried out, including in particular information about:
 - (a) the numbers of people making use of the facilities and the frequency of such use, inclusive of changes in the number of staff associated with any lottery scheme where those changes have a material impact on RSPB gambling business
 - (b) the range of gambling activities provided by RSPB and the numbers of staff employed in connection with them
 - (c) the licensee's policies in relation to and experiences of, problem gambling.

- 8.4. RSPB will complete and submit the following returns to the Gambling Commission, within the following time periods:
- (a) Lottery submissions, within three months of the date of each lottery draw
 - (b) Regulatory returns, within 42 days of the end of each of RSPB annual period which is currently within 42 days of the end of March, each year.

- 8.4.1 RSPB will notify the Gambling Commission as soon as reasonably practicable of any reportable key events such as changes to operator status, relevant persons, financial events or regulatory proceedings as detailed in section 15.2.1 and 15.2.2 of the Gambling Commission's Licence Conditions and Codes of Practice (LCCP).

9. Marketing

- 9.1. RSPB will ensure that any incentive, reward scheme, or other arrangement under which the customer may receive money, goods, services or other advantage is proportionate to the type and level of the customer's gambling and is designed in such a way that:
- (a) the circumstances and conditions to which the benefit is available are clearly described and readily accessible to the customers being offered the potential benefit
 - (b) neither the receipt nor the value or amount of the benefit is dependent upon the customer gambling for a predetermined length of time or frequency and the amount of the benefit is not altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered
 - (c) if the value of the benefit increases with the amount the customer spends, it does so at a rate no greater than that at which the amount spent increases
 - (d) if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.
- 9.2. RSPB will limit the value of tickets sent to any one address which is not a member of RSPB or has not previously participated in any of RSPB lottery schemes to £20, or will maintain records of tickets distributed and not returned.
- 9.3. RSPB shall comply with the advertising codes of practice that apply to the form and media in which it advertises its gambling facilities or services and will apply the principles included within these codes of practice for media not explicitly covered.
- 9.4. RSPB will ensure that all marketing communications, advertisements and invitations to purchase do not amount to or involve misleading actions or misleading omissions within the meaning of the Consumer Protection from Unfair Trading Regulations

2008. Terms and conditions of each marketing incentive will be made available for the full duration of the promotion.

- 9.5 RSPB will ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site, that provides advice or information on responsible gambling.
- 9.6 RSPB will ensure that all advertising of gambling products and services will be undertaken in a socially responsible manner. RSPB will comply with the advertising codes of the practice issued by the Committee of the Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP), and shall follow any relevant industry code on advertising, including the Gambling Industry Code for Socially Responsible Advertising.
- 9.7 If significant conditions apply, RSPB will provide the customer with all significant conditions at the point of sale and on any marketing in a transparent and prominent manner. Where space limits the inclusion of such information, the RSPB must include information about the significant conditions to the extent it is possible to do so and clearly indicate that significant conditions apply. Where such marketing appears online, significant conditions must be displayed in full no further than one click away.
- 9.8 Unless expressly permitted by law, RSPB will ensure that customers are not contacted with direct electronic marketing without their informed and specific consent. Whenever a customer is contacted the customer will be provided with an opportunity to withdraw consent. If consent is withdrawn the RSPB will, as soon as practicable, ensure the customer is not contacted with electronic marketing thereafter unless the customer consents again. RSPB will ensure it is able to provide evidence which establishes that consent.

10. Complaints and disputes

- 10.1. RSPB will implement a Complaints and Disputes Procedure which will be made available to all potential or actual customers upon request or making a complaint (see overleaf).

Procedure – Complaints and Disputes

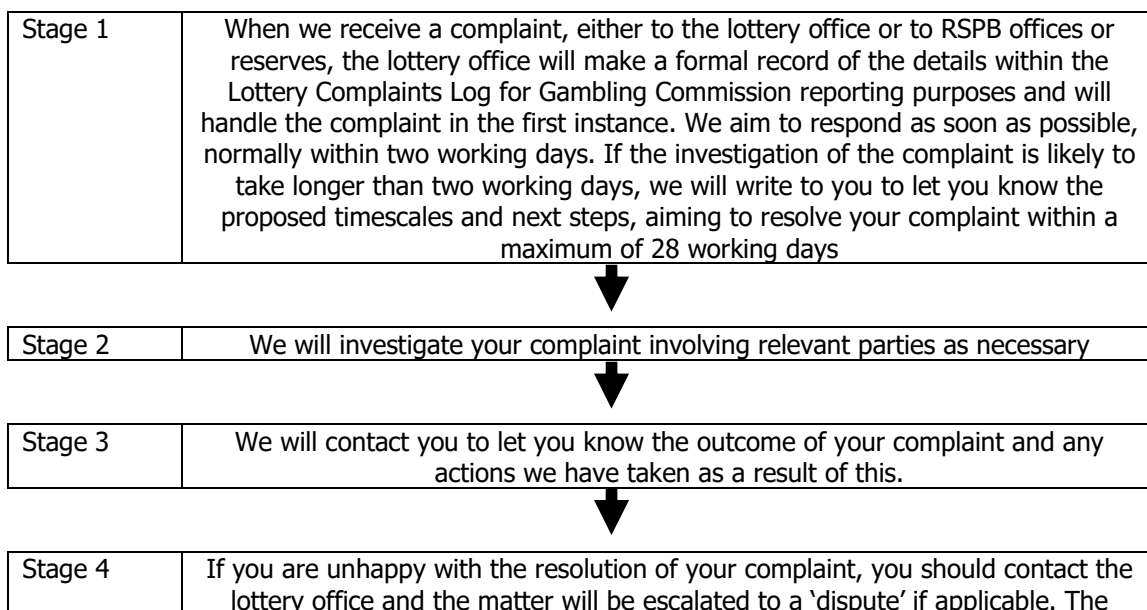
This section contains the Complaints and Disputes Procedure referred to in section 10 of the Gambling Policies document.

For further information please refer to RSPB Complaints Policy & Procedure (<https://www.rspb.org.uk/about-the-rspb/about-us/how-the-rspb-is-run/how-we-listen-and-respond/>)

RSPB will:

- i) make this Complaints and Disputes Procedure available to a potential or actual customer upon request
- ii) handle all complaints in accordance with this Complaints and Disputes Procedure
- iii) not impose any terms on the customer which restrict their right to bring proceedings against the RSPB in any court of competent jurisdiction (although, such terms may impose that a resolution agreed between both parties with the assistance of an ADR entity shall be binding)
- iv) maintain records of every customer complaint, disputes referred to ADR and court proceedings adverse to the RSPB in the format specified from time to time by the Gambling Commission
- v) advise the Gambling Commission on the status of all disputes that are referred to the Promoter (see below)
- vi) review and update this Complaints and Disputes Procedure when appropriate and/or in accordance to any guidance published by the Gambling Commission.

The Complaints and Disputes Procedure is outlined as follows:



	matter will be referred to the Promoter to reconsider the outcomes, and we will contact you within 10 working days. The Promoter's decision is final. You will be advised of any outcomes.
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Stage 5	If you are still not satisfied, you can contact the IBAS (www.ibas-uk.co.uk) within two months of our decision.
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Records

- The lottery complaints log will be held for three years.
- All lottery players are advised in writing of their membership.
- Spend and income accounts are submitted to the Gambling Commission each month and kept on record for three years

Training

All staff involved in RSPB lottery in any way should ensure they are familiar with this policy and its requirements and ensure all activities comply with them.

Performance measures

Annual assessment of materials against this policy, including www.rspb.org.uk
Annual assessments to be undertaken as outlined in the policy.

Review period

This policy should be reviewed in three years' time by the fundraising, legal and finance teams, unless any changes to the requirements of the Gambling Commission require the policy to be amended before then.

Appendix 1

RSPB Quarterly Raffle Rules

1. Applications must be from players aged 16 years old or over. No person under this age is allowed by law to enter the RSPB Quarterly Raffle.
2. Any person who has entered the RSPB Quarterly Raffle who is under 16 years old will automatically forfeit any prize and will be excluded from future entries. If a child under 16 years old is found to have participated in a lottery after the lottery draw has taken place, then a full refund will be made to that person and any prizes that might otherwise have been due to them will not be paid out. If prizes have already been paid out, all reasonable attempts will be made to recover them.
3. The RSPB reserves the right without notice or reason to cancel or refuse entry to the raffle. The RSPB decision on all matters affecting the draw is final and legally binding. No correspondence regarding the results of the draw will be entered into.
4. The cost of each ticket and entry is £1. New players will be sent no more than 12 tickets.
5. The draw will take place on the day promoted on the RSPB Raffle mail pack. There are four draws each year - Spring, Summer, Autumn and Winter.
6. Top three winners will be notified by telephone where a telephone number is available. A list of winners will be published on our website www.rspb.org.uk/winners the next working day after the draw. The list of winners can also be accessed by calling RSPB Supporter Services. The RSPB will publish winning ticket numbers.
7. There are no alternatives to the cash prizes and no interest is payable. Payment of prizes will be made by cheque by post within 21 days.
8. Tickets may not be sold in the street.
9. The RSPB accepts no liability for loss, theft or delay due to post or for any interest for late items. The RSPB is not liable for any late bank payments.
10. RSPB staff and their families are excluded from playing the Raffle. Woods Group Limited Response Services employees are excluded from playing the Raffle.
11. No detail in the application may be changed in any way once it has been submitted except for change of address.
12. The RSPB Quarterly Raffle is open to residents of England, Wales and Scotland. No entrants are allowed from Northern Ireland, the Channel Islands, or the Isle of Man.
13. The RSPB Quarterly raffle is subject to the laws of England and Wales.
14. Complaints will be handled in line with complaints procedure found within RSPB Policy & Procedure. This is available online at www.rspb.org.uk/gamblingpolicy Complaints that cannot be resolved by the RSPB including personal attention from the Promoter will be escalated to a third party; the Independent Betting Adjudication Service Ltd (IBAS).

Supporting Information used in promotion of RSPB Raffle

The RSPB is licensed by the Gambling Commission (gamblingcommission.gov.uk), licence number 4704, and this lottery is run under the rules laid down by the Gambling Act 2005.

The RSPB Quarterly Raffle is intended to be a fun way to support the RSPB and the vital work we do. Are you gambling more than you really want to? If you feel you have a problem with gambling please visit GamCare's website for help and advice at www.gamcare.org.uk, or contact the National Gambling Helpline between 8 am and midnight on 0808 8020 133.

The person responsible for this lottery is Joanna Coker at RSPB, The Lodge, Sandy, Bedfordshire SG19 2DL. The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654. The RSPB, UK Headquarters, The Lodge, Sandy, Bedfordshire SG19 2DL.

RSPB Weekly Lottery Rules

1. Applications must be from players aged 16 years old or over. No person under this age is allowed by law to enter the RSPB Weekly Lottery.
2. Any person who has entered the RSPB Lottery who is under 16 years old will automatically forfeit any prize and will be excluded from future entries. If a child under 16 years old is found to have participated in a lottery after the lottery draw has taken place, then a full refund will be made to that person and any prizes that might otherwise have been due to them will not be paid out. If prizes have already been paid out, all reasonable attempts will be made to recover them.
3. The RSPB reserves the right without notice or reason to cancel or refuse entry to the lottery. The RSPB decision on all matters affecting the draw is final and legally binding. No correspondence regarding the results of the draw will be entered into.
4. The cost of each entry is £1 per week. Players can take a maximum of five chances and payment must be received (and cleared) before entry to the weekly draw.
5. The draw will take place every Friday except when a Friday falls on a bank holiday, then the draw will take place on the next working day.
6. Winners will be notified by post within 7 days and a list of winners will be published on our website www.rspb.org.uk/winners the next working day after the draw.
7. The RSPB will publish winning ticket numbers.
8. The rollover jackpot runs between December and December for a maximum of 52 weeks. The rollover jackpot, if not won, will increase by £155 each week. If the rollover is won, the rollover value will revert to £155. If nobody wins the rollover prize before the first week of December each calendar year the prize fund will be £8,060 where 52 weeks have passed since it was last won, or £8,215 where 53 weeks have passed. Our computer will then run the rollover draw until one lucky lottery player wins the rollover prize.

9. There are no alternatives to the cash prizes and no interest is payable. Cash prizes will be transferred directly into the winners' bank accounts within 14 days of the draw.
10. The RSPB accepts no liability for loss, theft or delay due to post or for any interest for late items. The RSPB is not liable for any late bank payments.
11. RSPB staff and their families are excluded from playing the RSPB Weekly Lottery. Woods Group Limited Response Services employees are excluded from playing the RSPB Weekly Lottery.
12. No detail in the application may be changed in any way once it has been submitted except for change of address.
13. The Lottery is open to residents of England, Wales and Scotland. No entrants are allowed from Northern Ireland, the Channel Islands, or the Isle of Man.
14. This Lottery is subject to the laws of England and Wales.
15. Complaints will be handled in line with complaints procedure found within RSPB Policy & Procedure. This is available online at www.rspb.org.uk/gamblingpolicy Complaints that cannot be resolved by the RSPB including personal attention from the Promoter will be escalated to a third party; the Independent Betting Adjudication Service Ltd (IBAS).

Supporting Information used in promotion of Weekly Lottery

The RSPB is licensed by the Gambling Commission (gamblingcommission.gov.uk), licence number 4704, and this lottery is run under the rules laid down by the Gambling Act 2005.

The RSPB Weekly Lottery is intended to be a fun way to support the RSPB and the vital work we do. Are you gambling more than you really want to? If you feel you have a problem with gambling please visit GamCare's website for help and advice at www.gamcare.org.uk or contact the National Gambling Helpline between 8 am and midnight on 0808 8020 133.

The person responsible for this lottery is Joanna Coker at the RSPB, UK Headquarters, The Lodge, Sandy, Bedfordshire SG19 2DL.