

Responsible Gambling Policy

1. Introduction

- 1.1 The Brain Tumour Charity is a registered charity (110054 England and Wales and SCO45081 Scotland), that is dedicated to funding research, raising awareness, reducing diagnosis times and providing support and information for people affected by brain tumours.
- 1.2 To fund our services, we undertake a range of fundraising activities, including prize-led fundraising such as our Win Big Weekly Lottery and our Raffle. These licensed activities are society lottery products, promoted for the benefit of a non-commercial society, established and conducted for charitable purposes.
- 1.3 The Gambling Act 2005 is designed to control all forms of gambling and provides a legislative framework for operating society lotteries and raffles. In line with the act, The Brain Tumour Charity has obtained relevant licences from the Gambling Commission, who regulate all commercial gambling in Great Britain.

The Brain Tumour Charity, registered at Fleet 27, Rye Close, Fleet, Hampshire, GU51 2UH, is licensed and regulated by the Gambling Commission under account number 60695, details as follows:

- Non-Remote Society lottery licence number 060695-N-335625-001
- Ancillary Remote Society lottery licence number 060695-A-335626-001

The Brain Tumour Charity operates in accordance with the Gambling Commission's (<https://www.gamblingcommission.gov.uk/>) Licence Conditions and Codes of Practice (LCCP) for lotteries.

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 sets out the following licensing objectives:

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

2. Fair and Open Draws

- 2.1 We are committed to conducting our lottery and raffle in a fair and open manner.
- 2.2 We will ensure that all Terms and Conditions for the running of our licensed activities are fair and open and are available to all participants prior to committing to a purchase.
- 2.3 Terms and Conditions are published on our website and relevant microsites. Players will be notified of any changes before they come into effect and a copy of the Terms and Conditions, and any material changes thereto will be lodged with the Gambling Commission no less than 28 days before they come into effect.
- 2.4 Players have access to clear information on matters such as the rules of the game, the prizes that are available, the odds of winning, and the way in which prizes are allocated.

2.5 Upon request from any player, we will provide a full history of their lottery membership, including complete payment and winnings history.

2.6 We will ensure that all key promotional details in respect of prizes and entry costs will be available to participants prior to any remote or non-remote participation into The Brain Tumour Charity's licensed activities.

2.7 We work with the External Lottery Manager (ELM) Sterling who run our lottery and raffle draws using a random number generator that has been certified by a Gambling Commission approved test house.

2.8 Winning numbers will be published on our lottery and raffle websites.

2.9 All raffle tickets (and counterfoil) will have a unique ticket number and sold at the same value per ticket.

2.10 All lottery and raffle draws will clearly communicate the closing date and the date of the draw on tickets and websites. Late entries will be gratefully treated as donations.

3. Protection of Children and Vulnerable Persons

3.1 We will not permit sales of tickets to anyone under the age of 18.

3.2 All licensed products' marketing and promotional activity will advertise the minimum age for participation. Under the CAP code requirements for marketing of society lotteries, The Brain Tumour Charity will not depict people under 25 and our advertising will not be appealing to under-age persons.

3.3 Sterling has also implemented age verification checks on a percentage of new online sign ups via a third-party integration. The third-party system Sterling is AgeChecked, a leading online PAS 1296 online age checking compliant service provider.

3.4 Third parties, employees and volunteers signing up supporters for licensed activities will be trained to ensure that entries are not permitted by under 18's. If supporters appear to be under-age then they will be asked to produce identification. If they fail to produce satisfactory identification then they will not be permitted to purchase entries into our lottery or raffles.

3.5 For remote sign-ups, supporters are required to enter their date of birth prior to signing up to the lottery and online raffle. If the supporter is under 18 Sterling's system will not allow tickets to be purchased.

3.6 No lottery or raffle tickets will be sold by or to, on behalf of, or for a person under the age of 18 years. If a lottery or raffle ticket is sold unknowingly to, on behalf of, or for a person under the age of 18 he/she will be disqualified from the raffle and will forfeit his/her prize and the purchase price will be returned.

3.7 In line with The Brain Tumour Charity's vulnerable person assessment process, we will politely refuse to accept further participation from people who have been discovered to be vulnerable or are suspected of being vulnerable. We may request that the person speaks with a carer or trusted family member before proceeding further with the gambling transaction.

3.8 All employees and volunteers will be trained to recognise vulnerable or potentially vulnerable people in line with the Fundraising Regulator Code of Fundraising Practice and Mental Capacity Act 2005.

3.9 Individuals can end contact with charities that they no longer wish to hear from through the Fundraising Preference Service. This can be done for yourself, someone else or an individual who has passed away by going to <https://www.fundraisingpreference.org.uk/home>.

4. Responsible Gambling

4.1 We are committed to ensuring that information about how to gamble responsibly and how to access information and help in respect of problem gambling is readily available.

4.2 Our prize-led microsites and media relating to the promotion of our licensed activities will provide information on gambling support organisations and alert players to Be Gamble Aware. We will further

support this through an annual financial contribution to Gambling Commission approved organisations dealing with research, prevention & treatment of problem gambling.

4.3 On request, we will close any player's lottery membership for a minimum period of 6 months, during which time the membership cannot be reinstated.

4.4 Our society will provide appropriate awareness training to our employees on problem gambling.

4.5 To help customers to keep control of their gambling and recognise when it has become a problem we will provide information on our prize-led communications to highlight that they should:

- See gambling as entertaining and not as a way of making money
- Avoid chasing losses
- Only gamble what you can afford to lose
- Keep track of the time and amount you spend gambling
- Read the game rules
- Know that help is available

4.6 Records will be kept of raffle tickets mailed and not returned for a period of 6 months after the draw.

If you are concerned that gambling may become a problem for you or someone you care about, the following questions can help you to identify problem gambling:

- Do you stay away from work to gamble?
- Do you gamble to escape from a boring or unhappy life?
- When gambling and you run out of money, do you feel lost and in despair and need to gamble again as soon as possible?
- Do you gamble until your last penny is gone, even the fare home or the cost of a cup of tea?
- Have you ever lied to cover up the amount of money or time you have spent gambling?
- Have others ever criticised your gambling?
- Have you lost interest in your family, friends or hobbies?
- After losing, do you feel you must try and win back your losses as soon as possible?
- Do arguments, frustrations or disappointments make you want to gamble?
- Is your mental health being affected because of your gambling?

If the answer is 'yes' to one or more of these questions, you/they may have a gambling problem and we advise that you/they speak to someone about it. You/they should contact the National Gambling confidential helpline on 0808 8020 133 or visit the website <https://www.begambleaware.org/> for further information.

4.7 **Lottery & raffle tickets will not be sold to a person in any street:** For these purposes 'street' includes any bridge, road, lane, footway, subway, square, court, alley or passage (including passages through enclosed premises such as shopping malls) whether a thoroughfare or not. Tickets may, however, be sold in a street from a static structure such as a kiosk or display stand. Tickets may also be sold door to door. The Brain Tumour Charity will ensure that we have any necessary local authority permissions, such as a street trading licence.

4.6 A single player will be limited to a maximum of £10 worth of entries in our lottery per week.

4.7 A single player will be limited to buy £50 worth of £1 tickets per raffle.

4.8 Each player in our lottery will be limited to a single membership.

4.9 We will not take lottery or raffle entry payments via credit card.

5. Self-Exclusion

If you feel you may have a problem with gambling you can request to be self-excluded. .

When you self-exclude, we will exclude you from all gambling communications for a minimum of six months and until you tell us that you are ready to receive information from us. We will remove you from our marketing database and you will not receive any marketing communications from us until you decide to opt in to communications.

We will also let our External Lottery Manager Sterling know so that you can be removed from their database and your account managed as set out in 5.3 and 5.5.

- 5.1 We will make information about how to self- exclude and what this will mean for the supporter available on our lottery and raffle microsites, or you can call us on 01252 237792 or download the form here and send back to Supporter Care Team, Fleet 27, Rye Close, Fleet, Hampshire, GU51 2UH, or email to weeklylottery@thebraintumourcharity.org.
- 5.2 Our employees, volunteers and third parties will be trained to administer the self-exclusion system and signpost to counselling and support services.
- 5.3 Our ELM, Sterling Management Centre Limited utilises technology which identifies self- excluded players and prevents them from re- entering the lottery within the period of self-exclusion.
- 5.4 A self- excluded individual will be flagged or removed from our marketing databases within two days of receiving a completed self- exclusion notification.
- 5.5 During self- exclusion, a player's account will be closed and any funds held on their behalf will be returned to them. Your numbers may match the winning numbers in a draw, but you will not be eligible to win if you have self-excluded from the lottery.
- 5.6 Where self- exclusion has expired, we will not market our licensed activities or any other comms from The Brain Tumour Charity to that player unless they have made a positive decision to return to the lottery or raffle of their own accord.
- 5.7 We cannot self-exclude individuals at the request of another individual unless they can prove that they are said individual's power of attorney.

6. Preventing Gambling from Being a Source of Crime and Disorder, Being Associated with Crime and Disorder, or Being Used to Support Crime

- 6.1 We will maintain our Gambling Commission licenses in accordance with the Licensing Code of Conduct and Practices and submit the required reports to the Gambling Commission.
- 6.2 We will train our employees and volunteers to recognise suspicious transactions and the process of reporting them in line with the Proceeds of Crime Act.
- 6.3 We reserve the right to reject any entry in our lottery or raffles should we suspect criminal activity.
- 6.4 Age verification checks will be performed on a sample of lottery and raffle players who enter by remote means.
- 6.5 A single player will be limited to a maximum of £10 worth of entries in our lottery per week.
- 6.6 Each player in our lottery will be limited to a single membership.
- 6.7 We will not take lottery entry payments in cash.