

Plan International UK Social Responsibility in Gambling Policy

24th July 2017

Plan International UK promotes its own society lottery for the sole purpose of raising funds for Plan International UK to support its beneficiaries. The Lottery is managed on behalf of Plan International UK by its External Lottery Manager (ELM) People's Postcode Lottery.

It is our policy to ensure we and our licensed External Lottery Manager (ELM), People's Postcode Lottery are compliant with all relevant regulations regarding Responsible Gambling and the protection of vulnerable individuals from harm or the exploitation of gambling. We are committed to this and continue to ensure that we work together as an industry and meet good industry standards.

The Gambling Commission regulates gambling to ensure that:

- it is crime free
- it is fair and open; and,
- children and vulnerable children are protected.

This policy sets out our approach to ensuring we approach any gambling activities in a socially responsible way.

1. **Preventing gambling from being a source of crime and disorder**

When a player joins our contracted society lottery managed on our behalf by People's Postcode Lottery:

- players need to provide their date of birth and need to have a bank account or other age-related verified payment method
- players must have a bank account or other age-verified payment methods, and
- players must be resident in Great Britain; lottery tickets are dependent on the provision by a player of a valid GB postcode

To prevent fraud and criminal activity:

- prizes are only paid to paying playing accounts
- ensure draws are adjudicated by an independent legal representative and completed on a secure, standalone and certified draw engine;
- offers no cash subscriptions; and,
- reports suspicious activities to the Gambling Commission and to the Police, under the Proceeds of Crime Act 2002.

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

For our contracted society lottery managed on our behalf by People's Postcode Lottery, we will ensure that:

- players' funds are protected from insolvency, with lottery proceeds held separately from any other trading income and in approved accounts;
- promotion of draws in line with consumer law and follows the Committee on Advertising Practice and ClearCast guidelines;
- players have access to clear information on matters such as the rules of the lottery and the prizes that are available, and providing notification of changes which are submitted to the Gambling Commission 28 days in advance;
- tickets are provided clearly indicating the promoting society, details of the society, dates of the draw, price of the tickets and licensed by the Gambling Commission;

- a complaints process that is in place to deal with any issues in a clear and procedural way, including an option of Alternative Dispute Resolution.

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

- People's Postcode Lottery works with regulated third parties that have a process for age verification
- People's Postcode Lottery adheres to advertisement rules laid out by the Committee of Advertising Practice, summarised below:
 - To not encourage gambling that may lead to socially irresponsible acts or could lead to financial, social or emotional harm.
 - To not exploit children or other vulnerable persons.
 - To not suggest gambling can solve financial problems or debts.
 - To not suggest gambling can increase attractiveness or sexual success.
 - To not link gambling to youth culture or attempt to attract young persons to gamble.
 - A customer care process that creates an alert when a player subscribes with more than six tickets.

We will endeavour to address the following issues:

Underage Gambling

It is illegal for individuals under the age of 16 to enter into a lottery. If for whatever reason, upon winning any individual is unable to prove that they are 16 or over then any winnings will be forfeited.

Gambling Limits

People's Postcode Lottery imposes limits on the number of tickets purchased by an individual in a single transaction to three. For those subscribing to six or more tickets we will actively contact these individuals on a regular basis to discuss the number of playing subscription and reduce, where appropriate.

Self-Exclusion

People's Postcode Lottery must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. The minimum self-exclusion period offered for non-remote gambling is of duration of not less than 6 and no more than 12 months. In terms of remote gambling the minimum self-exclusion period is 6 months up to 5 years. At the end of the period, the self-exclusion remains in place, unless the customer takes positive action in order to gamble again.

No marketing material should be sent to the individual unless the individual has taken positive action in order to gamble again, and has agreed to accept such material. Where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again, the customer is given 24 hours to cool off before being allowed to reactivate their play.

Promotion of Special Responsibility in Gambling

Whilst the majority of people do gamble within their means, for some, gambling can become a problem. Through our membership of the Lotteries Council, we regularly contribute to the Responsibility in Gambling Trust (RGT) to fund research and public education on the risks of gambling and how to gamble safely. On our website, we provide a link to the GambleAware website. In the event that a player feels their level of gambling is causing difficulties, our in-house customer care team will actively refer them to these services.

Access to Player History.

People's Postcode Lottery will provide any player with a full history of their Lottery subscription, including complete payment and winnings history upon request.

General points about People's Postcode Lottery

In their operations, the Lottery confirms that:

- The Lottery is regulated by the Gambling Commission under licences 829-N-102511-010 and 829-R-102513-009.
- Postcode Lottery Ltd has an 'External Lottery Manager' (also known as an ELM) licence to promote lotteries on behalf of charities. The individual charities have operating licences and the individual charities are accountable for all the proceeds.
- All staff are trained and made fully aware of these social responsibility policies.

Data Protection

People's Postcode Lottery will manage all details relating to players, and their bank account securely and in accordance to the requirements of the Data Protection Act. No player's details will be ever passed to third parties.

Legal requirements

Plan International UK will adhere to all relevant legal requirements in order to promote its Lottery and our ELM has significant experience in operating responsible processes within the legal framework required for the business.

REVIEW

This policy will be reviewed on an annual basis.