

Lotteries: Policy Statement

1. Introduction

- 1.1 Canal & River Trust ("the Trust") is committed to ensuring that all its lottery activity is operated in a secure, fair and socially responsible way. The following Policy Statement and the Lotteries Standard detail the measures in place to ensure that its lottery activities are conducted in line with the regulatory framework set out by the Gambling Act 2005 by:
 - 1.1.1. Preventing gambling from being a source of crime and disorder, being associated with crime and disorder, or being used to support crime;
 - 1.1.2. Ensuring that gambling is conducted in a fair and open way;
 - 1.1.3. Protecting children, problem gamblers and other vulnerable persons from being harmed or exploited by gambling.
- 1.2 This Policy Statement and the Lotteries Standard apply to all employees, volunteers, External Lottery Managers (ELM) and third-party contractors.

2. Promoting responsible gambling

- 2.1 To ensure people gamble responsibly and provide details of how they can seek help should gambling become a problem, the Trust will:
 - 2.1.1. ensure that the GambleAware helpline number and website address is published on lottery advertising collateral and on websites where gambling is advertised, as well as where a supporter can purchase lottery tickets.
 - 2.1.2. ensure that supporters cannot purchase entries using credit cards via remote means.
 - 2.1.3. ensure supporters can request a self-exclusion from its lottery at any time by contacting the Trust via telephone, email or post. Anyone wishing to self-exclude will be excluded for a minimum period of 6 months.




- 2.1.4. ensure if supporters want to gamble again, they must take a positive action after the 6 months have passed. A 24-hour cooling off period will be given where an additional positive action will be required before they are permitted to gamble again.
- 2.1.5. ensure that supporters self-excluding are signposted to where they can get additional support, e.g. GambleAware. The GambleAware or GAMCARE web address and telephone number will be included on all gambling advertising, including the raffle website. The Trust will ensure supporters who have self-excluded are removed from future gambling-related marketing for the duration of their self-exclusion.
- 2.1.6. ensure that supporters are prevented from purchasing more than £50 of tickets per draw, unless authorised by the Trust's Head of Individual & Legacy Giving (who will keep a record of why the authorisation was given). Any attempt to exceed this limit will be referred to the Trust's Head of Individual & Legacy Giving to review. This is to prevent gambling harm.
- 2.1.7. make a payment (either directly or as part of its membership fee paid to the Lotteries Council) each year to the Lotteries Council to fund research, education and treatment activities in relation to problem gambling.
- 2.1.8. ensure that anyone who will be taking ticket sales will be trained to spot behaviours which may indicate a supporter is a problem gambler.
- 2.1.9. submit a quarterly regulatory return and declare on that quarterly regulatory return the number of supporters who self-exclude because of problem gambling.

3. Responsible gambling information to supporters

- 3.1 The Trust will ensure that it displays the 'Responsible gaming information for supporters' as required by the Gambling Commission's Licence Conditions and Codes of Practice Condition 3.1.1 on the raffle microsite.

4. Preventing gambling from becoming a source of crime

- 4.1 To prevent its lotteries from becoming a source of crime and disorder, being associated with crime and disorder, or being used to support crime the Trust will:
 - 4.1.1. refuse to be associated with any proposed Lottery scheme or gambling activity that may breach the law;
 - 4.1.2. refuse to contract with any contractors or agents who it suspects may be associated with any potential or actual criminal activities;

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- 4.1.3. ensure thorough due diligence is actioned for third party appointment. Where required, the Trust will only use suppliers who are licensed by the Gambling Commission to run all or part of its own lottery business;
- 4.1.4. require all suppliers to:
- ensure they provide suitable employees and obtain references from all prospective employees that are likely to be associated with the Trust's gambling business;
 - ensure all staff working on behalf of the Trust complete training on this Policy Statement and the Trust's Lotteries Standard and understand their responsibilities on working within the law.
 - monitor their employees on an ongoing basis, particularly regarding their direct or indirect association with potential criminal activities.
- 4.2 The Trust will ensure that its ELM operates from secure premises, with fire safes in situ, and that its ELM uses approved security service providers.
- 4.3 The Trust will ensure that its ELM processes all monies received for lotteries which are paid directly into the Trust's bank accounts, and that weekly banking reports are issued by its ELM.
- 4.4 The Trust will ensure no person is enrolled into any of its lottery schemes if that person is suspected of any potential or actual criminal activities.
- 4.5 If any transaction appears to be suspicious, the Trust or its ELM (depending on who is processing the transaction) will freeze that transaction, and any other transaction made by the same supporter.
- 4.6 The Trust will conduct and regularly review an assessment of the money laundering risks to its business and record the outcome on the risk register, which is managed by the Trust's Legal & Governance Director.
- 4.7 The Trust will prevent supporters from purchasing more than £50 worth of tickets per draw unless authorised by the Trust's Head of Individual & Legacy Giving (who will keep a record of why the authorisation was given). Any attempt to exceed this limit will be referred to the Trusts' Head of Individual & Legacy Giving to review.
- 4.8 The Trust will ensure that all staff selling raffle tickets are trained to look out for any suspicious activity relating to the purchase of lottery tickets in line with this Policy Statement and its Lotteries Standard, including training face to face fundraising staff to not accept Cash for any Lottery payment.

- 4.9 The Trust will ensure that any suspicious activity is reported to the Trust's Legal & Governance Director, the Gambling Commission and if deemed necessary, the police.
- 4.10 The Trust will ensure only supporters residing in Great Britain are permitted to enter lotteries run by the Trust.
- 4.11 The Trust will ensure any payment provider(s) used have experienced risk and fraud teams who scan, validate and monitor payment card transactions for potentially suspicious transactions.
- 4.12 The Trust's Legal & Governance Director will be responsible for ensuring that the Trust complies with its obligations in relation to anti-money laundering under LCCP 12.1.1. The Trust will ensure that any change to the identity of the Trust's Legal & Governance Director is reported to the Gambling Commission as a 'Key Event' within 5 working days of the change.
- 4.13 The Trust will ensure references are obtained from all prospective employees who are likely to be associated with the Trust's gambling business.
- 4.14 The Trust will take appropriate action as per its Disciplinary Standard, if made aware of any employee or volunteer directly or indirectly associating in criminal activities.
- 4.15 The Trust will ensure any actual or suspected criminal activities are reported to the Trust's Legal & Governance Director and if deemed necessary, to the police.
- 4.16 The Trust will train all staff involved in promoting lotteries or selling lottery tickets to a satisfactory standard to ensure compliance with this Policy Statement and the Trust's Lotteries Standard, and will keep an up-to-date list of staff who have read the policies and signed a form to confirm that they have read them.

5. Protecting children and vulnerable people

- 5.1 To ensure that its lotteries do not attract children and/or vulnerable people, and to prevent underage players from participating in any lotteries promoted by the Trust, the Trust will:
 - 5.1.1. check its databases, where possible, to ensure people are above the legal age limit before data is supplied for the use of a lottery;
 - 5.1.2. ensure that the minimum age for play (which is 18) is detailed on all marketing material and collateral (digital or print). The Trust will ensure that its ELM includes this information on lottery tickets and on the websites where lottery tickets can be purchased.

- 5.1.3. Ensure that any player entering via remote communication is required to provide a valid DOB and affirm their age.
- 5.1.4. ensure any form of acquisition activity to purchase lottery tickets contains:
- a request for the applicant's date of birth
 - a statement that underage gambling is an offence.
- 5.1.5. randomly age verify three prize winners from its lottery by phone, before issuing the prize, and record that age verification has occurred on their record;
- 5.1.6. if suspicion arises that a player may have been dishonest about their age, try to obtain age verification by telephoning the player (where the Trust has their number and permission), consulting other open-source material such as the electoral register, and finally by writing to the individual. If the Trust is still unable to obtain this verification, the Trust will terminate the individual's account and return all monies paid;
- 5.1.7. return monies paid in relation to the lottery to any player that is found to be underage;
- 5.1.8. include in the rules that any prizes will not be provided to anyone who is found to be underage;
- 5.1.9. ensure lotteries are not intentionally designed to appeal to children or young people who are underage by making it clear on all material that a player must be over 18 to play;
- 5.1.10. continuously review where and how its lotteries are advertised to ensure that the Trust does not intentionally appeal to children or young people who are under 18;
- 5.1.11. ensure that a record is marked as 'Opt Out' on its database where a request to cease sending lottery marketing material is received from either an individual or a vulnerable person's carer in relation to the vulnerable person, as long as the Trust has suitable permissions or Power of Attorney for the carer to make decisions on behalf of the individual.

6. Keeping draws fair and open

- 6.1 The Trust will only conduct its lottery draws in association with a Gambling Commission licensed External Lottery Manager (ELM). The Trust, with its ELM, will:
- 6.1.1. Keep a record of all remote ticket sales for a minimum of 3 years;

6.1.2. Submit a lottery return after each draw that details the amount in remote and non-remote ticket sales, and keep a copy of each such return for a minimum of 3 years;

6.1.3. Keep a record of all lottery returns for a minimum of 3 years. These records will include:

- Lottery draw date;
- Branded/non-branded lottery;
- Type of lottery (raffle or subscription);
- Ticket cost;
- Largest prize;
- Total prizes;
- Total proceeds of the lottery;
- Expenses incurred for each lottery and details of those expenses;
- Percentage of proceeds allocated directly to the purpose(s) of the Society (at least 20% of the gross proceeds);
- Percentage allocated to prizes in each lottery;
- Number of unsold tickets in each lottery;
- Statement of confirmation.

6.1.4. Ensure all websites comply with the License Conditions and Codes of Practice (LCCP) and include:

- The charity's name, address, company registration number and Society registration number;
- The name and address of the member responsible for promoting the lottery;
- The ticket price;
- The date of the draw, or sufficient information to enable the date of the draw to be ascertained;
- The Gambling Commission account number and link to the Gambling Commission's register;
- A clear statement that persons under the age of 18 may not sell or purchase tickets, and will be unable to receive a prize.

6.1.5. Ensure any promotional materials for the lottery are clear and not misleading, and all advertising for the lottery complies with the advertising code of practice applicable to the form and media the advert is in;

6.1.6. Ensure that the following information is detailed within the rules of each Lottery and is signposted to supporters prior to them entering the draw:

- The prize list for each lottery draw;
- A description of how winners are determined and how prizes are allocated;
- The likelihood of winning a prize, which can be based on current or previous year;
- The percentage of the proceeds spent on prizes (including prizes rolled over);
- The percentage of the proceeds spent on expenses related to promoting and running the lotteries;
- The percentage or amount of the proceeds applied directly to the purposes of the society and the total proceeds from all tickets sold.

6.2 All draws are conducted by the Trust's ELM using a certified random number generator.

6.3 The Trust will notify winners within 7 days of the draw taking place.

6.4 A list of winners, including winning numbers, will be published on the Trust's website. The winner's list will also be available on request, in hard copy or via email.

6.5 If a lottery prize winner has moved and cannot be located, the Trust will hold the prize in its account for 6 months and then take it as a donation to the Trust if unclaimed.

6.6 The Trust prohibits employees and volunteers of the Trust and its ELM who are involved in the lottery operations from playing the Trust's lottery.

6.7 The Trust will publish lottery rules on its website and any significant changes to how the Lottery is run will be communicated to all players by post or email.

6.8 The Trust will ensure that its ELM comply with the Gambling Commission's remote technical standards.

6.9 The Trust will publish the proportion of money raised from ticket sales in the previous year that was returned directly for the purposes of the Trust.

7. Handling complaints and disputes

7.1 For the purposes of this section a 'complaint' means an expression of dissatisfaction, whether spoken or written, about any aspect of the way the Trust or its ELM conducts their licensed activities, e.g. a complaint:

- 7.1.1. about the outcome of a gambling transaction;
 - 7.1.2. about the way a gambling transaction has been managed;
 - 7.1.3. that concerns the way the Trust or its ELM carries out its business in relation to licensing objectives.
- 7.2 The Trust will ensure that:
- 7.2.1. Any complaint received is recorded upon receipt. The complainant's contact information, details of the telephone adviser who took the call or member of staff who investigated the written complaint, the nature of the complaint and how the complaint was investigated and resolved will be recorded;
 - 7.2.2. All complaints are investigated and escalated where appropriate;
 - 7.2.3. Resolution of a gambling related complaint, including escalation, will take no longer than eight weeks from when the complaint was first received, unless the complainant fails to respond to a reasonable request for information within seven days. If at any time a complainant doesn't respond to such a request within seven days, the Trust may 'stop the clock' until the complainant does respond, at which point it will be restarted.
- 7.3 If an individual informs the Trust that they are unhappy with the resolution of their gambling related complaint, or if a complaint remains unresolved after eight weeks (taking into account any periods for which the 'clock' was paused), the Trust must then write to the supporter with a final letter to explain:
- 7.3.1. the final decision;
 - 7.3.2. that this is the end of the Trust's complaints process; and
 - 7.3.3. how to escalate their complaint to a Gambling Commission approved Alternative Dispute Resolution (ADR) entity, if they wish to.
- 7.4 Access to the ADR entity is free of charge to players and will not restrict players' rights to bring proceedings in any court of competent jurisdiction. The decision of the ADR entity will be binding on both parties.
- 7.5 The Trust will declare on its quarterly regulatory return the number of complaints and disputes received.
- 7.6 The Trust will keep a record of all complaints and disputes, which will be held for 3 years.

8. Reporting

- 8.1 In order to meet the requirements for notifying the Gambling Commission (GC) of any Key Events as defined in the Licence Conditions and Codes of Practice (LCCP), as well as required information recording and reporting requirements, the Trust will:
- 8.1.1. Inform the GC of the occurrence of Key Events, as defined in the LCCP, within 5 working days of the occurrence of the event;
 - 8.1.2. Inform the GC of other reporting events in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable;
 - 8.1.3. Ensure all Key Event and other reportable event notifications to the GC include the date the event took place, a description of the event and its outcome;
 - 8.1.4. Raise a SAR (suspicious activity report) with the National Crime Agency if there is knowledge or suspicion of money laundering or terrorist financing;
- 8.2 Key Events and other reportable events include (but are not limited to) the following:
- 8.2.1. Any material changes in the Trust's structure or the operation of its business;
 - 8.2.2. Any material changes in managerial responsibilities or governance arrangements;
 - 8.2.3. The arrival or departure of any individual occupying a key management position or any change to the identity of the Money Laundering Reporting Officer or their Deputy;
 - 8.2.4. Any petition being presented for the winding up of the Trust;
 - 8.2.5. Any material changes in the Trust's banking arrangements;
 - 8.2.6. Any change in the Trust's arrangements for the protection of customer funds;
 - 8.2.7. Any criminal investigation by a law enforcement agency in any jurisdiction involving the Trust;
 - 8.2.8. The imposition by the Trust of a disciplinary sanction against the holder of a personal licence or person occupying a qualifying position for gross misconduct;
 - 8.2.9. Any breach in the Trust's information security that adversely affects the confidentiality of supporter data;

- 8.2.10. The commencement or cessation by the Trust of trading on website domains;
 - 8.2.11. Any person who has gambled with Canal & River Trust who has died by suicide, whether such suicide is known or suspected to be associated with gambling;
 - 8.2.12. Knowledge or suspicion of money laundering or terrorist financing, or fraud;
 - 8.2.13. Change of Head Office or registered address;
 - 8.2.14. Change of trading name;
 - 8.2.15. Adding or removing licence activity;
 - 8.2.16. Fee category changes
- 8.3 To aid the above the Trust and its ELM will implement the following measures:
- 8.3.1. Conducting regular reviews of its money laundering and terrorist financing risk assessment taking into consideration guidelines published by the GC from time to time;
 - 8.3.2. Assessing lottery transactions to identify any suspicious patterns and behaviour;
 - 8.3.3. Ensuring records are maintained of customer interaction which will include:
 - Identification – what the supporter was doing to prompt the interaction.
 - Interaction – what was said or done.
 - Evaluation – what happened next so the Trust can understand the impact and effectiveness of the actions and the approach so it can review the process if needed.

9. Returns

- 9.1 It is a condition of the Trust's Gambling Commission operating licence or Local Authority registration that returns be made within 3 months of the draw of the lottery. The information that must be included on the lottery return is as follows:
- 9.1.1. The date on which tickets were available for sale or supply and the date of the draw;
 - 9.1.2. The total proceeds of the lottery;
 - 9.1.3. The amounts deducted by promoters of the lottery in providing prizes, including roll-overs;

- 9.1.4. The amounts deducted by the promoters of the lottery in respect of costs incurred in organising the lottery;
- 9.1.5. The amount applied directly to the purpose(s) for which the promoting society is conducted (at least 20% of the gross proceeds);
- 9.1.6. Whether any expenses incurred in connection with the lottery were not paid for by deduction from the proceeds, and, if so, the amount of expenses and the source(s) from which they were paid.
- 9.2 It is also a condition of the Trust's Gambling Commission operating licence that quarterly regulatory returns are submitted within 28 days of the end of each annual period. The information that must be included on the regulatory lottery return is as follows:
- 9.2.1. Operational events
- 9.2.2. Contributions
- 9.2.3. ELM Information
- 9.3 All accounting records, lottery returns, regulatory returns and reporting outcomes will be retained for a minimum of 3 years.

10. Training

- 10.1 This Policy Statement and the Lotteries Standard will be reviewed and updated every six months in line with LCCP revisions.
- 10.2 All relevant staff are required to:
- 10.2.1. read the Policy Statement and Standard before they start working on the Trust's Lotteries, and when they are updated; and
- 10.2.2. sign a document to confirm that they have appropriate training. These training records will be held for a minimum of 3 years.



David Orr CBE

Chair to the Board of Trustees



Richard Parry

Chief Executive

March 2025