

Gaming and Responsible Gambling Policy

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1. Introduction

- 1.1 Macmillan Cancer Support (MCS) was founded in 1911 and is one of Britain's largest charities. A registered charity (261017), MCS aim is to help improve the lives of people affected by cancer in the UK - those with cancer and their families, carers and communities. It achieves this by providing specialist health care information and financial support to people affected by cancer. As well as helping with the medical needs of people affected by cancer, MCS also looks at the social, emotional and practical impact cancer can have, and campaigns for better cancer care.
- 1.2 To fund its services, MCS undertakes a wide range of activities including holding annual events such as World's Biggest Coffee Morning, large events like 'Brave the Shave' and direct mailing campaigns, as well as local fundraising events.
- 1.3 One important area of MCS fundraising activities is the 'Macmillan Lotteries'. Lotteries (or raffles) can only be run for good causes. Macmillan Lotteries consists of four large society lotteries. Society lotteries are promoted for the benefit of a non-commercial society, established and conducted for charitable purposes, and where lottery proceeds exceed £20,000 for a single draw or £250,000 per annum.
- 1.4 Macmillan Lotteries' four large society lotteries are each being promoted by a subsidiary trading company known as a 'promoter'. The promoters undertake trading activities to make profits to provide funding for a specific area of support for people affected by cancer:

Macmillan Financial Grants Lottery Ltd

- Registered Company number 9494065, Gambling Commission Licence number: 44252, supports providing financial grants to people affected by cancer.

Macmillan Cancer Information Lottery Ltd

- Registered Company number.9771409, Gambling Commission Licence number: 44254, supports providing information services including Cancer Information Centre, the Macmillan Support Line and cancer information.

Macmillan Influencing Cancer Care Lottery Ltd

- Registered Company number 9771351, Gambling Commission number: 44255, supports providing support to re-design and improve cancer care practices across the UK including research and campaigning to improve cancer services, influencing cancer policy and raising awareness (of the needs of people affected by cancer) amongst key stakeholders and policy makers.

Macmillan Healthcare Lottery Ltd

- Registered Company number 9771479, Gambling Commission Licence number 44253, supports providing for MacMillan Professionals including nurses engaged in health or social care and funding specially designed cancer treatment cancer.

The subsidiaries are all registered at 89 Albert Embankment, London, SE1 7UQ.

- 1.5 Macmillan Financial Grants Lottery Ltd, Macmillan Cancer Information, Lottery Ltd and Macmillan Influencing Cancer Care Lottery Ltd operate the weekly lottery on a monthly rotational basis, with Macmillan Healthcare Lottery Ltd operating raffles four times per year. The Macmillan Lottery Charity Draw Calendar located on the MCS's website sets out the draw dates.
- 1.6 The Gambling Act 2005 ('The Act') is designed to control all forms of gambling and provides the legislative framework for operating a Large Society Lottery. In line with

the Act, Macmillan Lotteries' have registered its four large society lotteries with The Gambling Commission, who regulate commercial gambling in Great Britain in partnership with licensing authorities. Macmillan Lotteries will always adhere to the legal requirements of the Act.

- 1.7 Macmillan Lotteries' have been issued with the necessary operating licenses to conduct its lotteries. Each promoter has a Remote Lottery Licence (internet, telephone or any other electronic or technological method of communication) and a Non-Remote Lottery Licence (door to door canvassing or by normal letter post), and the required Personal Management Licenses for MCS staff who occupy senior positions in respect of the lottery operation.
- 1.9.1 Macmillan Lotteries also operate its Lotteries in accordance with the Gambling Commission's general Licence Conditions and associated Codes of Practice (LCCPs) which set out the general conditions attached to its licenses, together with outlining the principal Codes of Practice.
- 1.7 The Act outlines three licensing objectives; which Macmillan Lotteries' must comply with:
 - 1 Ensuring that gambling is conducted in a fair and open way (chapter 2)
 - 2 Protecting children and other vulnerable persons from being harmed or exploited by gambling (chapter 3)
 - 3 Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime (chapter 4)

The Act also places a responsibility on Macmillan Lotteries to promote socially responsible gambling (chapter 5).

- 1.10 This policy will be updated to reflect any future changes to the LCCPs and regulatory framework with which Macmillan Lotteries' operates.

2. Fair and Open Draws

- 2.1 Macmillan Lotteries are committed to conducting its lotteries in a fair and open manner.
- 2.2 Macmillan Lotteries will ensure that all Terms and Conditions for the running of lotteries are fair and open and are available to a participant who may request them.
- 2.2 Terms and Conditions are published on MCS's website. Customers will be notified of any changes to the terms before they come into effect.
- 2.3 MCS will ensure that key promotional details in respect of prizes and entry costs are made available to customers prior to any online or non-remote participation in any Macmillan Lotteries.
- 2.3 A Random Number Generator (RNG) tested and approved by the Gambling Commission will be utilised for the weekly lottery.
- 2.4 The raffle draw (non-remote) will be witnessed by at least one MCS representative other than that person manually selecting the winning tickets

- 2.5 Macmillan Lotteries will also ensure that all Lottery Tickets have printed upon them: “licensed and regulated by the Gambling Commission”, the operating licence number and details of the Gambling Commission’s website.
- 2.6 Winning numbers will be published on MCS’s website.
- 2.7 Prize winners’ cheques will be posted out direct to the winners.

3. Protection of children and vulnerable persons

3.1 Macmillan Lotteries will not permit sales of tickets to any person in a vulnerable circumstance or any person under the age of 16 to participate in a lottery or any other form of gambling.

3.2 Protecting children

3.2.1 The lottery rules and any lottery marketing/promotional literature, including any lottery tickets, will adequately and effectively advertise the minimum legal age.

3.2.2 Macmillan Lotteries has implemented the following procedures to ensure that its lotteries do not attract children under the age of 16:

- lottery ticket sellers will be advised that it is a criminal offence to invite or allow a child under 16 years of age to enter a society lottery
- all entrants to Macmillan Lotteries shall confirm that they are over the age of 16
- all lottery tickets for Macmillan Healthcare Ltd (non-remote lottery) shall state on the ticket that the ticket must not be sold to any person under the age of 16. MCS staff, volunteers and representatives who are selling tickets will request any entrant who appears to be under the age of 16 to produce appropriate proof of identity and age before being allowed to purchase a lottery ticket
- if a person enters Macmillan Lotteries stating that they are over the age of 16 years and subsequently it is found that they are less than 16 years of age, they will have any money paid in relation to Macmillan Lotteries returned to them and where relevant will automatically forfeit the right to any prize
- Macmillan Lotteries will conduct an annual risk assessment of our processes to prevent persons under 16 entering, which may include making reasonable improvements that may become available as technology advances and as information improves.
- all cold data bought by Macmillan Lotteries’ supplier contains persons over the age of 18
- Macmillan Lotteries do not have prizes where alcohol is included; however, where incidental lotteries are operated in local areas and alcohol is included in the prizes, tickets must always state that they are not to be sold to anyone under the age of 18

3.3 Protecting vulnerable people

- 3.3.1 In line with MCS's Policy on Fundraising with People in Vulnerable Circumstances, Macmillan Lotteries will politely refuse to accept any further participation 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 further with the gambling transaction
- 3.3.2 Macmillan Lotteries will also monitor ongoing contact or communications with customers e.g. subscription renewals, to try and detect whether a person's vulnerability becomes evident after initial sign up, such that the customer's membership can be cancelled and any future gambling-related communications can be terminated.

4. Crime and Disorder

- 4.1 MCS is committed to preventing gambling from being a source of or associated with crime or disorder, or being used to support crime.
- 4.2 Macmillan Lotteries will refuse to contract with any contractors or agents who are suspected of being associated with any potential or actual criminal activities.
- 4.3 Macmillan Lotteries are required to:
- conduct pre-approval checks on all prospective MCS and supplier employees associated with Macmillan Lotteries
 - provide training to new employees in MCS and in suppliers, and periodic reminder training to all employees associated with Macmillan Lotteries
 - immediately take action to suspend an employee, supplier employee or supplier associated with Macmillan Lotteries if a direct/ indirect association with potential criminal activities is detected.
- 4.5 Macmillan Lotteries will only use gambling software that has been licensed by the Gambling Commission to manufacture, supply, install or adapt gambling software to promote a lottery.
- 4.6 Macmillan Lotteries will ensure that lottery administration is conducted from secure premises that have adequate systems and processes in place that:
- restrict access to buildings and premises
 - control use of and access to passwords, safes, locked cupboards, computer networks and the internet.
- 4.7 Macmillan Lotteries subscription based weekly lottery promotion materials are designed to allow for a maximum of two weekly entries per person at £1 per entry, thus minimising the risk of criminal activity.
- 4.8 Macmillan Lotteries promote the sale of both non-remote and remote lottery entries by Direct Debit, payable on a per calendar month basis,
- 4.9 Sellers of non-remote subscription based weekly lottery tickets, whether by door-to-door, kiosk, or telemarketing, are not be permitted to take cash or cheque in lieu of payment, thus further minimising risk.

- 4.10 MCS's Internal Audit conducts periodic risk assessments on financial controls within MCS and Macmillan Lotteries. In addition, Macmillan Lotteries has a Money Laundering Risk Assessment Template it uses to conduct assessments. MCS has a Money Laundering Policy and a Money Laundering Reporting Officer (MLRO).
- 4.11 Macmillan Lotteries will provide the Gambling Commission with any information which may relate to the commission of an offence under the Act.
- 4.12 Macmillan Lotteries will not accept suspicious or fraudulent transactions and MCS will report such transactions to the National Crime Agency under The Crime of Proceeds Act 2002.

5. Responsible Gambling

5.1 Macmillan Lotteries is committed to ensure that information about how to gamble responsibly and how to access information and help in respect of problem gambling is readily available to all.

5.2 Keeping Gambling Under Control:

The majority of people do gamble responsibly and gambling in moderation is okay, but to help keep gambling under control, Macmillan Lotteries recommend:

- Remembering that taking part is for fun and not as a means of investing money
- Setting strict limits on how much time and money to spend, before playing
- Only gambling with money that can be afforded to be lost
- Not spending more money on gambling in the hope that it will be won back again
- Keeping up other interests and hobbies and not letting gambling take over one's life
- Not gambling to escape from stress or boredom.

5.3 How to Identify That Gambling Is Becoming a Problem:

For some people however, gambling can become a problem. If some of the following signs are present, it is likely a gambling problem exists:

- Gambling behaviour is criticised by others
- Lying to cover up the amount gambled or the time spent doing it
- Gambling in response to arguments, frustrations or disappointments
- Gambling alone for long periods
- Staying away from work/ college to gamble
- Gambling to escape from a boring or unhappy life
- Reluctancy to spend 'gambling money' on anything else
- Losing interest in your family, friends or pastimes due to gambling
- After losing, feeling must try to win back the losses as soon as possible
- When gambling and running out of money, feeling lost, in despair and need to gamble again as soon as possible
- Gambling until the last penny is gone
- Lied, stolen or borrowed just to get money to gamble or to pay gambling debts
- Feeling depressed or even suicidal because of gambling

5.4 How to Get More Information and Help About Problem Gambling:

Visit www.gambleaware.co.uk or call the GamCare National Helpline on 0808 8020.

5.5 Macmillan Lotteries has put in place the following procedures to encourage people to gamble responsibly and seek help should gambling become a problem:

- all ticket dispatches are recorded and players can request a self-exclusion from the MCS database for future participation in gambling
- Macmillan Lotteries is a member of the Lotteries Council, an umbrella body which promotes the interests of organisations which run lotteries and makes an annual donation to The Responsible Gambling Trust on behalf of its members
- Macmillan Lotteries rules, website and any marketing and promotional literature will, as far as is reasonably possible, advertise the Gamble Aware logo, the Gamble Aware website and the GamCare National Helpline number (0808 8020 133), with the following supporting text: *“If you feel you have a problem with gambling, visit www.gambleaware.co.uk or call the National Gambling Helpline on 0808 8020 133.”*

5.6 Macmillan Lotteries will endeavour to ensure that it identifies and reacts to any suspected problem gamblers. Upon receipt of an application to participate in its lottery from a suspected problem gambler:

- any requests for any tickets in excess of the recommended maximums will be refused
- the customer will be referred to GamCare
- the customer’s details will be logged in MCS’s database for the purposes of possible exclusion from future participation in future lotteries.
- future written and verbal communications will be monitored.

5.7 If an existing customer is suspected of becoming a problem gambler:

- any request for any additional entries will be refused
- the customer will be referred to GamCare
- the customer’s details will be suppressed and will be excluded from future lottery participation and mailings
- future written and verbal communications will be monitored.
- any money allocated to future draws will be refunded

5.8 Macmillan Lotteries will initiate customer verification checks to ensure that the customer is aware of the level of gambling currently being undertaken, when approached by customers who:

- wish to purchase 5 or more books of 10 lottery tickets in any raffle scheme
- are suspected problem gamblers.

5.9 The weekly lottery is restricted to a maximum of ten lines per player.

6. Self Exclusion from Gambling

6.1 Macmillan Lotteries has a self-exclusion process in place for potential and existing players which begins with a request from the customer. A form can be completed on the website or the customer can contact MCS by phone, email or post.

6.2 If an existing customer self-excludes from gambling, Macmillan Lotteries will ensure:

- the person who has asked to be self excluded will be removed from any gambling related marketing databases within two days of receiving the completed self-exclusion notification and will be excluded indefinitely
- self excluders will not then receive any future gambling-related marketing materials, unless the self-excluder takes positive action to gamble again and has specifically agreed to such materials.
- any advance payments applicable to the lottery scheme will be refunded by Macmillan Lotteries at the earliest opportunity
- the person may wish to consider self-exclusion further than Macmillan Lotteries and are provided GamCare's contact details

6.3 If Macmillan Lotteries receives an application to participate in the lottery from a person who has previously self excluded themselves, the application will be rejected and the prospective customer will be advised in writing of the reasons for rejection and provided GamCare's contact details.

6.4 All communication between staff and self-excluders/ suspected problem gamblers will be recorded in writing, monitored and approved by the Compliance Manager.

7. Complaints

7.1 All complaints relating to Macmillan Lotteries will be handled in accordance with MCS's Complaints Policy.

7.2 MCS will:

- Make the Complaints and Disputes Procedure available to a customer via the MCS website www.macmillan.org.uk, or upon request.
- Handle all complaints in accordance with this Complaints and Disputes Procedure
- Annually report to the Gambling Commission on the number and status of all complaints

8. Financial and Information requirements

8.1 Financial requirements

8.1.1 All money received by Macmillan Lotteries will be handled in accordance with MCS's finance and cash handing policies.

8.2 Information Requirements

8.2.1 Macmillan Lotteries will make all reasonable efforts to ensure that the Gambling Commission are 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

8.2.2 Macmillan Lotteries 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 Commission as soon as is reasonable practicable and in any event

within five working days of the licensee becoming aware of the events occurrence. Key events are those concerning Operator status, Relevant persons and positions, Financial events, Legal or regulatory proceedings or reports, and Gambling facilities.

- 8.2.3 Monthly Lottery Submissions will be completed by MCS and will be submitted to the Gambling Commission within 3 months of the date of each lottery draw.
- 8.2.4 Macmillan Lotteries will submit an annual Lottery Regulatory Return to the Gambling Commission.