

Lotteries & Raffles Policy (LRP002)



Lotteries & Raffles Policy

LRP002

Document Control

Author	Sarah Bishop	Supporter Engagement Officer
Approvers	Louise Robertshaw, Charles Newitt	Gambling Commission Post Holders

Reviewed by

Name	Role	Date sent	Date returned
Anne Weatherill	Deputy Director of Fundraising	09/06/2021	10/06/2021
Haley Rainey	Head of Community Engagement	24/03/2021	30/03/2021
Hannah Mason	Senior Direct Marketing Manager	22/02/2021	23/02/2021
Colin Grove	Head of Data	24/03/2021	23/04/2021
Tricia Johnstone	Deputy Director of Finance	11/06/2021	30/06/2021
Jennifer Woolford	Fundraising Compliance Specialist	30/06/2021	07/07/2021
Jo Pugh	Special Events Manager	24/03/2021	30/03/2021

Lotteries & Raffles Policy (LRP002)

Contents

1. Introduction.....	3
2. Purpose and Scope	3
3. Values	3
4. Definitions.....	3
5. Licences.....	4
Ancillary Remote licence-	4
Non remote licence-	5
6. Lotteries.....	5
Terms and Conditions.....	5
7. Raffles.....	6
Terms & Conditions.....	6
8. Running lotteries and raffles at events.....	6
9. Complaints & Disputes	7
10. Problem Gambling	7
11. Social Responsibility in Gambling	8
12. Preventing Crime and Disorder in Gambling	8
13. Conducting Gambling in a Fair and Open way.....	9
14. Protecting children and vulnerable persons.....	9
15. Protection of Customer Funds	10
16. Self -Exclusion.....	10
17. Approval and Review	10
18. Relevant Documents, Policies & Procedures.....	11
19. RASCI Framework.....	11
20. Appendix 1- Approved Regulators & Alternative Dispute Resolution	12
21. Appendix 2- Types of lottery that do not require permission	12

Lotteries & Raffles Policy

(LRP002)

1. Introduction

- 1.1 This document sets out the policy for holding lotteries and raffles at London's Air Ambulance Charity and how they should be run at events "in aid of" the charity as required by the Gambling Commission Licence Conditions and Codes of Practice.
- 1.2 We use lotteries and raffles to raise awareness for the charity in order to gain long term support for the charity.
- 1.3 All lotteries and raffles come under London's Air Ambulance Trading Ltd, Registered Company Number: 04836606.

2. Purpose and Scope

- 2.1 The lottery and raffle activity is regulated by the Gambling Commission and we therefore are committed to having a policy to outline how we run our gambling activity. This document is to ensure that we are operating our lotteries and raffles in a fair, transparent and honest way.
- 2.2 This document aims to set out:
 - The terms and conditions by which we run our lotteries and raffles.
 - The terms and conditions by which raffles should be conducted at events.
 - Provide clear guidance for staff about our social responsibility in gambling.
 - Provide clear guidance to staff and members of our lotteries and raffles of how they can self-exclude.

3. Values

- Compassion- We care about people and put them at the heart of everything we do. We are kind, respectful and always keen to listen to feedback.
- Courageous- We are prepared to achieve our mission in challenging environments. We are authentic, honest and not afraid to challenge and take calculated risks.
- Pioneering- We embrace and lead change through our innovation and creativity. We are constantly learning, both from our successes and from our failures, to make sure we are always striving to improve.

4. Definitions

- 4.1 London's Air Ambulance Trading Company uses lotteries and raffles in order to raise funds for the charity, while giving people a chance to win something in return.
- 4.2 A **lottery** is a game where people buy a chance to win a prize. For London's Air Ambulance Charity this is a lottery number which is £1 a week, where each number has an equal chance of winning.
- 4.3 A **raffle** is a type of lottery, with again people buying a chance to win a prize. Raffles tend to have a range of prizes available and the ticket sales and raffle draw tend to happen as part of the same event on a date set in advance.
- 4.4 '**Proceeds**' are the total amount paid for tickets before any deductions.

Lotteries & Raffles Policy

(LRP002)

4.5 'Profits' are the amount of proceeds, minus any deductions for prizes, reasonable expenses incurred in connection to running a lottery.

4.6 Gambling Commission Post holders - the Gambling Commission requires notification of qualifying positions, these are detailed in Schedule X of the licence, sometimes referred to as 'Annex B' holders. For London's Air Ambulance the named persons are:

- Louise Robertshaw – Director Fundraising & Marketing
- Charles Newitt – Deputy CEO

4.7 In addition to the above, the Senior Marketing Analysis Officer is the London's Air Ambulance administrator for the Gambling Commission.

4.8 The Responsible Persons are the named persons with responsibility of the lottery. They must be an employee of the charity and not an external lottery manager, approved by the Gambling Commission and listed on Schedule X of the lottery operating licence.

4.9 The lead Responsible Person is the Director of Fundraising and Marketing. In their absence, this responsibility will be taken by the Deputy CEO. The Responsible Person is to ensure:

- Gambling Commission is notified of all key changes and key events.
- Monthly and annual lottery returns are submitted within the required timescales.
- That lottery and raffle notifications and returns are submitted within the required timescales.
- Any incidents that require notification are reported. E.g. complaints escalated to the regulator, self exclusions and self exclusion breaches.
- That London's Air Ambulance Charity are members of the Lotteries Council and make the appropriate contribution towards research, education and treatment of problem gamblers.

5. Licences

5.1 London's Air Ambulance Trading Limited hold two licences, granted by the Gambling Commission and licensed for society lottery gaming activity.

5.2 Society lotteries can only be run for good causes and cannot be run for private or commercial gain.

5.3 Depending on the category of licence you apply for, this lets you run a lottery with proceeds of up to £5 million for a single draw and aggregate proceeds of £50 million in a year.

Ancillary Remote licence-

5.4 Authorises the licensee to provide facilities for single premises gaming by means of remote communication that is situated entirely on the set of premises on which the gaming takes place.

5.5 At London's Air Ambulance Charity this includes online lottery sales and our raffle that is run remotely.

Lotteries & Raffles Policy

(LRP002)

- 5.6 The ancillary remote licence is only suitable for holders of a non-remote society lottery operating licence who want to accept payment for participation in a lottery by remote means, up to a maximum of £250,000 in remote proceeds per annum.
- 5.7 Licence number: 029691-A-314940-007 since 18 September 2012.

Non remote licence-

- 5.8 A non-remote licence is required for physical, land-based gambling, for example, bookmakers, betting shops, arcades and casinos.
- 5.9 At London's Air Ambulance Charity this includes our face to face fundraising activity and will cover any raffles we chose to run at events.
- 5.10 Licence number: 029691-N-311036-009 since 7 July 2011.

6. Lotteries

Terms and Conditions

- 6.1 London's Air Ambulance Charity lottery is a weekly draw. Each chance costs £1 per week and upon receipt of an application we will issue the player with a unique membership number which will be entered into the draw each week.
- 6.2 London's Air Ambulance Charity use a gambling software, a Random Number Generator (RNG) produced by Tower Lotteries Ltd who have been licensed by the Gambling Commission to manufacture, supply, install or adapt gambling software to promote a lottery.
- 6.3 The odds on winning the draw depends on how many members paid in a particular week. If you have 100,000 paying members, the odds on winning the top prize are 100,000/1. As we have 7 prizes each week, the odds on winning any prize are 100,000/7. It all depends on that paying membership number, so the odds will change from week to week.
- 6.4 The average likelihood of winning a prize will be updated annually on the lottery pledge form for face to face fundraising and also on the lottery microsite for the website. The Senior Direct Marketing Manager will have responsibility for this, working with the Direct Marketing Manager (Face-to-Face) and Direct Marketing Officer (Appeals).
- 6.5 Any lottery sales are not eligible for gift aid as it is a gambling product and there is a weekly chance to win, e.g. it is a not a direct donation to the charity.
- 6.6 The rules of the lottery are referenced in [Relevant Documents, Policies & Procedures](#) and are available via the charity website.

Lotteries & Raffles Policy (LRP002)

7. Raffles

Terms & Conditions

- 7.1 London's Air Ambulance Charity currently conduct their raffles through Sterling Lotteries– a registered External Lottery Manager (ELM) licensed by the Gambling Commission.
- 7.2 Sterling Lotteries operates from secure premises. They operate an online platform which complies with all relevant codes and remote technical standards. They keep a record of all tickets that have been distributed. They are able to provide address details and details of any monies sent in for tickets received.
- 7.3 Our External Lottery Manager processes all entries and handles all monies received for the raffle. All monies are paid directly into London's Air Ambulance Trading bank account, and banking reports are issued by our External Lottery Manager on a weekly basis.
- 7.4 The odds of winning a prize in the raffle will be calculated from the previous raffle, based on how many tickets were sold and how many prizes were on offer. The Direct Marketing Officer (Appeals) will update the Raffle Rules.
- 7.5 The rules of the raffle are updated regularly and are referenced in [Relevant Documents, Policies & Procedures](#) and available via the microsite for the raffle.
- 7.6 Any raffle ticket sales contribution is not eligible for gift aid as it is a gambling product and there is a chance to win a prize. However, if a donation is made as well as purchase of any raffle tickets, this donation is eligible for gift aid.
- 7.7 The raffle dates may change due to when the data selections can be made and also will need to be updated with each new raffle.

8. Running lotteries and raffles at events

- 8.1 Lotteries (also referred to as 'raffles') can be held at events (e.g. fundraising dinners, summer fetes etc.). In some cases the event may last more than a single day.
- 8.2 For these types of events, the Gambling Commission has created guidance on lotteries that require permission and lotteries that do not require permission ([Appendix 2-Types of lottery that do not require permission.](#)) Although not all lotteries and raffles at events may need permission, there is still guidance that needs to be adhered to, to ensure they are run responsibly.
- 8.3 The lottery may be an event run by London's Air Ambulance Charity (e.g. the Gala) or it could be an event run "in aid of" the charity where the proceeds are returned to the cause (e.g. summer fete).
- 8.4 At London's Air Ambulance Charity, most of the lotteries organised at events will fall under the category of 'incidental'- which can be held at commercial or non-commercial events and must be for charitable causes and cannot be for private gain. It is an offence to use or permit profits from these types of lottery to be used for any purpose other than the purposes for which the lottery was permitted or promoted.
- 8.5 Incidental lotteries can only be carried on as an ancillary attraction at an event. It cannot be the main focus of the event.
- 8.6 A ticket must be provided but there are no specific requirements for tickets.

Lotteries & Raffles Policy (LRP002)

8.7 In line with the Gambling Commission's advice on lotteries that do not require a licence or registration, incidental lotteries must comply with the below:

- London's Air Ambulance Charity may not deduct more than £100 from the proceeds in respect of the expenses incurred in organising the lottery, such as the cost of printing tickets, hire of equipment etc.;
- No more than £500 can be deducted from the proceeds of the lottery for prizes. However, there is no maximum limit on the value of donated prizes;
- The lottery cannot include a rollover of prizes to the next event;
- Tickets can only be sold at the location and during the event. The results of the lottery can be drawn at the event or after it has finished. It is recommended that the organisers make it clear to participants when the result will be drawn.

9. Complaints & Disputes

9.1 In the event of someone wanting to make complaint about our lotteries or raffles, they should contact the Supporter Engagement Team in the first instance. A complaint can be made by phoning 020 3023 3319, emailing supportercare@londonsairambulance.org.uk or by writing to FAO Supporter Engagement, 5th Floor, 77 Mansell Street, London, E1 8AN.

9.2 In the event of a dispute occurring regarding the outcome of a gambling transaction, or the awarding of prizes that cannot be resolved in discussion with London's Air Ambulance Charity, players may contact IBAS (Independent Betting & Adjudication Service) who will request statements and supporting evidence from both parties, before publishing a final adjudication. The service is available free of charge for all. The IBAS website (<https://www.ibas-uk.com/>) contains information about their service, including the opportunity to complete a dispute online. Alternatively, they can be contacted by telephone, (020 7347 5883) or post; Independent Betting Adjudication Service, PO Box 62639, London, EC3P 3AS .

9.3 London's Air Ambulance Charity is committed to ensuring that if a dispute is not resolved then an Alternative Dispute Resolution (IBAS), [Approved Regulators and Alternative Dispute Resolution \(ADR\)](#), is in place in line with the Gambling Commission's regulations to comply with the License Conditions and Code of Practice License.

10. Problem Gambling

10.1 London's Air Ambulance Charity is committed to ensuring that lotteries and raffles are not open to people who may have a problem with gambling. The charity includes information about BeGambleAware on all relevant communications and makes public facing staff aware of this. Individuals who may have a problem with gambling are directed to the BeGambleAware website and their National Helpline on 0845 6000 133.

10.2 London's Air Ambulance Charity has a self-exclusion policy should someone want to opt out of playing our lotteries and raffles. This is available on our website or upon request, [Self-Exclusion](#).

Lotteries & Raffles Policy (LRP002)

11. Social Responsibility in Gambling

- 11.1** London's Air Ambulance Charity is committed to fundraising responsibly and we also encourage responsible gambling.
- 11.2** London's Air Ambulance Charity runs lotteries and raffles for the general public for the sole purpose of raising funds for the registered charity 801013.
- 11.3** London's Air Ambulance Charity is committed to ensuring that our lotteries and raffles are operated in a secure, fair and socially responsible way and to endorse responsible gambling amongst its members.
- 11.4** The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on the three following licensing objectives;

12. Preventing Crime and Disorder in Gambling

- 12.1** When an individual joins the lottery we will check that:
- The individual is aged 18 or over;
 - The individual is resident in the UK, excluding Northern Ireland, the Channel Islands and the Isle of Man;
- 12.2** The charity will carry out random age verification checks for the raffle and if someone cannot provide proof of age then their raffle ticket or prize will be forfeited. Please see the [Lottery and Raffle Winners Procedure](#) for more details.
- 12.3** We retain the right to cancel any lottery membership should we suspect criminal activity.
- 12.4** We do not accept cash from members of the public who want to join the lottery.
- 12.5** We limit the maximum number of entries to £10 per person per week.
- 12.6** As of April 2020, players will no longer be able to pay for lottery and raffle entries using a credit card.
- 12.7** The maximum amount of tickets available to purchase for previous raffle players and people who have not previously played before is decided in advance of the raffle. If someone requests more raffle tickets, this will be considered on a case by case basis.
- 12.8** All lottery related computers and software are password protected and accessible only by authorised members of staff.
- 12.9** There is a strict procedure if a member of staff is operating in an illegal manner. If there is any suspicious activity, a manager or Human Resources should be made aware through the Whistleblowing Policy, as referenced in London's Air Ambulance Employee Handbook, [Relevant Documents, Policies & Procedures](#).
- 12.10** When considering our approach to money laundering London's Air Ambulance Charity will work within the regulatory and statutory guidance as detailed below and in our Acceptance and Refusal of Donations Policy;
- Proceeds of Crime Act 2002 (POCA 2002);
 - Terrorism Act 2000 (TA 2000);
 - Money Laundering Regulations 2007 (MLR 2007);
 - Money Laundering, Terrorist Financing and Transfer of Funds (Regulations 2017 (MLR 2017). [regulation 18](#).

Lotteries & Raffles Policy

(LRP002)

13. Conducting Gambling in a Fair and Open way

- 13.1** We ensure that our lottery and raffle players have clear information on the rules and the prizes that are available.
- 13.2** In order to be as transparent as possible with our supporters we will provide annual figures on how we spend any proceeds from running lotteries and raffles. This will include information about how much is spent on prizes, how much is spent on expenses and how much is returned to London's Air Ambulance Charity.
- 13.3** The above information will be updated on the lottery pledge form for face to face fundraising and also on the lottery and raffle microsites for the website . The Senior Direct Marketing Manager will have responsibility for this, working with the Direct Marketing Manager (Face-to-Face) and Direct Marketing Officer (Appeals).
- 13.4** Any rules are fair and the results of any draw are published for members of the public on the website.
- 13.5** If we update the lottery rules at any time, we will inform our lottery members by sending an administrative update by email or mail.

14. Protecting children and vulnerable persons

- 14.1** It is illegal for anyone under the age of 18 to enter into a lottery. London's Air Ambulance Charity requires that all players of their lottery or raffles are over 18. If for whatever reason, upon winning any individual is unable to prove that they are 18 or over then any winnings will be forfeited.
- 14.2** We best endeavour to address the issue by having a minimum age of 18 for anyone who signs up via the website. If someone attempts to sign up with a date of birth under 18, they will not be able to continue through the online form.
- 14.3** For anyone who signs up with a face to face fundraiser we have a minimum age of 21 on our tablets to further safeguard any members of the public that may be vulnerable due to their age.
- 14.4** All face to face fundraisers are trained to detect vulnerability in potential supporters and to politely decline offers of support from these individuals.
- 14.5** The charity may carry out randomised spot checks by contacting lottery members and asking them to confirm their date of birth.
- 14.6** If someone self excludes, we will close any player's lottery membership(s) for a minimum period of six months during which time the membership(s) cannot be reinstated. During this period we will also try to ensure that the individual does not try and open a new membership, [Self-Exclusion](#).
- 14.7** We will provide any player with a full history of their lottery membership, including complete payment and winnings history upon request.
- 14.8** We provide information on gambling support organisations, self-help and awareness groups. All information is available via the website, upon request or on relevant communications.

Lotteries & Raffles Policy

(LRP002)

15. Protection of Customer Funds

- 15.1** All customer funds intended for the use in future gambling and or lottery subscriptions will be held in a separate bank account or accounts relating to the relevant good cause and will be completely separate from the companies trading income.
- 15.2** There are rules which outline how we run lotteries and raffles which can be found in [Relevant Documents, Policies & Procedures](#).

16. Self -Exclusion

- 16.1** London's Air Ambulance Charity operates a self-exclusion policy, so people can opt out of playing our lotteries and raffles if they feel they have a gambling problem.
- 16.2** An individual can opt out of playing for a minimum of six months to five years. We will not send any marketing material during this time and the lottery account will be closed. We will refund any unused funds via the method in which they paid for the lottery and refund any unused tickets that have been bought through the raffle.
- 16.3** Someone can self-exclude by contacting the Supporter Engagement Team on 020 3023 3319 between the hours of 9am-5pm during the working week. An email can be sent to supportercare@londonsairambulance.org.uk and a Self-Exclusion form can also be downloaded via the website.
- 16.4** Once we have received notification that someone would like to self-exclude, we will send a confirmation of the decision that will outline the amount of time someone has chosen to not partake.
- 16.5** In order to help us prevent them sign up to further gambling, or from receiving any gambling communication, the individual will be marked on the MASTER Mailing Spreadsheet that the Data team use for suppressions when sending out communications. This should be recorded on a CRM once this function is available in the future.
- 16.6** At the end of this period, the self-exclusion will remain in place for a further seven years unless we are informed that they want to gamble again.
- 16.7** If someone wishes to start gambling again after the minimum self- exclusion period, they will need to request a Restart Gambling form from the Supporter Engagement Team.
- 16.8** They will have a one day 'cooling off' period after we receive the Restart Gambling form in case they change their mind. The account can be chosen to be suspended again at any time.

17. Approval and Review

- 17.1** London's Air Ambulance Charity Lotteries and Raffles Policy will be approved by the Director of Fundraising & Marketing and Deputy CEO who are the Gambling Commission responsible persons at London's Air Ambulance Charity.
- 17.2** This policy will be reviewed annually. Ad hoc reviews will be carried out in the event of change in circumstances or legislation.

Lotteries & Raffles Policy (LRP002)

18. Relevant Documents, Policies & Procedures

- 18.1 London's Air Ambulance Charity- Lottery Rules
- 18.2 London's Air Ambulance Charity- Raffle Rules
- 18.3 Lotteries & Raffles Organisational Chart
- 18.4 London's Air Ambulance Charity- Selling Tickets Procedure
- 18.5 FCP001 Complaints Policy
- 18.6 Whistleblowing Policy
- 18.7 Refund Procedure
- 18.8 London's Air Ambulance Charity Employee Handbook
- 18.9 London's Air Ambulance- Self Exclusion Form
- 18.10 London's Air Ambulance- Restart Gambling Form
- 18.11 Lottery and Raffle Winners Procedure
- 18.12 ARD001 Acceptance and Refusal of Donations Policy

19. RASCI Framework

Responsible	Deputy Director of Fundraising and Marketing, Head of Community Engagement
Accountable	Director of Fundraising and Marketing, Deputy CEO
Supports	Fundraising Compliance Specialist Fundraising Compliance Officer Supporter Engagement Officer
Consulted	Head of Data Deputy Director of Finance Direct Marketing Manager (Face to Face) Senior Direct Marketing Manager Direct Marketing Officer (Appeals) Special Events Manager
Informed	Charity wide

Lotteries & Raffles Policy (LRP002)

20. Appendix 1- Approved Regulators & Alternative Dispute Resolution

Gambling Commission

The Gambling Commission handles complaints in relation to lotteries. They deal with complaints when you have a concern about the way the licence holder carries out its business in relation to the three licensing objectives.

- keep gambling free from crime and from being associated with crime
- ensure that gambling is fair and open
- protect children and vulnerable people from being harmed or exploited by gambling.

However, if a member of the lottery wants to raise a complaint about a gambling transaction that is not resolved in the first instance, then this would need to be referred onto an alternative dispute resolution (ADR). An organisation or charity that has a lottery must each have an external arrangements should an individual want their complaint to be escalated. In the case of London's Air Ambulance Charity, this is IBAS (Independent Betting & Adjudication Service).

<https://www.gamblingcommission.gov.uk/home.aspx>

Independent Betting & Adjudication Service

The Independent Betting Adjudication Service (IBAS) is an Alternative Dispute Resolution (ADR) service, approved by the Gambling Commission to provide informed and impartial adjudications on disputes that arise between licensed gambling operators and their customers, after the customer has completed the operator's own internal dispute procedures and where a deadlock still exists,

<https://www.ibas-uk.com/>.

21. Appendix 2- Types of lottery that do not require permission

Type of Lottery	Fundraising?	Who can play?	Who can run?	Limits on time	Limits on place	Can I claim my costs?	Rollover permitted?
Customer	Not for profit	Your customers 16 & over	Occupier of the business premises	7 days between	No sales or ads off premises	Yes, for prizes and reasonable lottery running costs	No
Private Society	Yes	Members of guests on the society premises	Society members	One-off	No sales or ads off premises. Members or guests must be on society	Yes, for prizes and reasonable lottery running costs	No

Lotteries & Raffles Policy (LRP002)

					premises		
Work	Yes	Employees at a single premises only	Any employees	One-off	No ads off premises Single premises only	Yes, for prizes and reasonable lottery running costs	No
Residents	Yes	Residents at a single premises only	Any residents	One-off	No ads off premises Single premises only	Yes, for prizes and reasonable lottery running costs	No
Incidental	Yes	Anyone at the event	Anyone	One-off	Sales only at event Results can be drawn during or after event	£100 max taken from proceed for expenses £500 max for prizes	No