Policy Template

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<th>Policy Title</th>
<th>RNLI External Lottery Policy</th>
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<tr>
<td>Policy Owner</td>
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Reason for Policy
The RNLI has in place a number of policies to ensure that the rules and regulations laid out by the Gambling Commission and included in the licences issued are adhered to.

Objective of Policy
To ensure that the RNLI Lifeboat Lottery is a fair and open draw, that is socially responsible and adheres to the rules and regulations stipulated by the Gambling Commission and lottery licences.

Applicability
All individuals and teams who are involved with the lottery as well as the general public who come into contact with the RNLI Lifeboat Lottery

Policy
The RNLI has in place a number of policies to ensure that the rules and regulations laid out by the Gambling Commission and included in the licences issued are adhered to. These policies that are relevant to you include:
- Complaints Procedure
- Your Personal Information
- Policy on Fair and Open Draws
- Policy on Responsible Gambling (Social Responsibility) and Self Exclusion

1. Complaints procedure

1.1 Our pledge to our supporters

We always aim to provide the highest level of customer service to all of our supporters. Should you not be satisfied with the level of service provided we do have a complaints procedure and welcome all feedback. You may, however, also want to feedback positive comments on the service you have received. These comments are just as important as they tell us what factors are contributing to a good experience for our supporters.

The RNLI aims to:
- treat all complaints seriously
- resolve complaints promptly and deal with them efficiently
- learn from complaints and take action to improve our service
As a member of the Lotteries Council and the Independent Betting Adjudication Services Limited (IBAS), we aim to promote the fundraising promise wherever practical.

- We are committed to high standards
- We are honest and open
- We are clear
- We are respectful
- We are fair and reasonable
- We are accountable

1.2 Our definition of a complaint

A complaint is an expression of dissatisfaction by a supporter about a particular solicitation, transaction or action carried out by the charity. General enquiries or comments regarding the charity are not regarded as complaints.

1.3 What to do if you have a complaint

You can make a complaint about the RNLI by telephone, in writing, email or in person (please see our contact details below). If you know the name or title of the member of staff or the department your complaint relates to, you should make your complaint direct to them in first instance. If you are not happy with the initial response you receive, you should contact us again addressing your comments to our Complaints Coordinator, Mrs Alison Murphy.

Write to: Royal National Lifeboat Institution, West Quay Road, Poole, Dorset BH15 1HZ

Call: 0300 300 9990 (Monday to Friday 8am-6pm excluding bank holidays)

Email: alison.murphy@rnli.org.uk

1.4 What happens next?

The RNLI will deal with all complaints promptly, within 2 working days of receipt. If the complaint is complex or cannot be dealt with in this timescale, then it will be acknowledged and the complainant advised of progress at regular intervals.

Following Mrs Murphy’s response, if you are still not satisfied, you can ask for your complaint to be referred to the Chief Executive of the charity.

If you remain unhappy with the charity’s actions, you may contact the Independent Betting Adjudication Services Limited (IBAS), of which the RNLI is a member and they will investigate your complaint and/or the way it has been handled. Their details are as follows:
2. Your personal information

If you use our complaints procedure, you are agreeing that we can use any personal information you send us for purposes connected with your complaint.

3. Policy on Lottery Fair and Open Draws

The details below show the rules under which entrants are entered into our Lifeboat Lottery quarterly draw, how the draw is done and how winners’ details are published.

Postal entries

- Any lottery tickets sent out are allocated to individuals and the ticket numbers recorded against the individuals’ record on the RNLI database for each Lottery.
- Each £1 ticket that is purchased is converted into a single ‘Chance’ (“Chance” being a £1 entry into the draw) that is then entered into the electronic draw. In order to play, a supporter must indicate how many tickets or ‘Chances’ they would like in the draw by sending back the form on the bottom of the letter sent out with the tickets along with payment.
- Winners do not need to provide the ticket’s counterfoil in order to prove that they are the winner if they are the person who has been sent the relevant lottery ticket, as we will have the ticket number logged on our database against their name.
- If a supporter gives some of their tickets away to friends and family, then the tickets’ counterfoils must be returned to us and the contact details must be completed on all counterfoils. Every ticket purchased is then converted into a Chance that is entered into the electronic draw. If selected as a prize winner, the ticket number is used to identify the person who purchased it. We then ask the winner to send in their ticket’s counterfoil to prove legal ownership and claim their prize.
- All monies received for the Lifeboat Lottery are banked by the RNLI into RNLI bank accounts.
- All monies received are handled in a locked, secure environment and stored securely overnight.
- On the draw date, there is a reconciliation exercise between the monies banked for ticket entries against the number of Chances in the draw.
- The RNLI is able to identify which individual a ticket was sent to if provided with the ticket number. Ticket numbers are not used in the draw. All Chances purchased by supporters are entered into an electronic draw using either the supporter CONNUM (unique reference number) or by allocated Chance number (dependant on whether the entrant returned the tickets or letter response form.
- The Chances are manually put into an electronic data table in random order. The screen shows rolling numbers, at over 200 per second (not
discernible), and winners are selected by a user clicking stop at any time. All draws are made at RNLI premises in sight of staff.

- All draws are made at RNLI premises in sight of staff. In addition, volunteers are sometimes invited to each draw to help select the winners.
- Winners are published on our website and also in our quarterly publication, the Lifeboat.
- Any tickets that arrive after the published “closing date” of a lottery, or where the returned response form is not completed in full, such tickets or entries will not be entered into the draw. And, as stated in the Lottery’s Terms & Conditions, the money is banked as a donation to the RNLI. A letter is sent to the supporter informing them that this has happened and gives them the opportunity, if they are not happy with this arrangement, to contact the RNLI to obtain a refund.

Telephone entries

- Individuals can purchase chances to play the Lifeboat lottery by calling our Supporter Care team on 0300 300 9990. Each chance purchased is converted into a single entry into our electronic draw. Chances cost £1 and players may purchase up to a maximum of 40 chances in any one transaction. Players can purchase up to a maximum of 150 chances per lottery by calling our Supporter Care team. Payment must be made in advance by one of the permitted methods.
- The chances are registered onto our supporter system and entered into our electronic draw using an allocated Chance number. The draw takes place as stipulated under Postal Entries.

4. Policy on Responsible Gambling (Social Responsibility) and Self-Exclusion

The RNLI have put in place the procedures and protective measures below, in order to encourage responsible gambling and to identify and help those with gambling problems.

Information on responsible gambling, and how to identify problem gambling, can be found on our website rnli.org/lottery. This page also provides contact details (telephone & web) for BeGambleAware for those who would like further information or help.

All Lifeboat Lottery tickets include contact details for help with gambling problems.

As a contribution to public education and research into problem gambling, the RNLI makes a contribution to The Responsible Gambling Trust (RGT) via its membership of the Lotteries Council. It will also consider making a donation to BeGambleAware as and when appropriate.

Supporters who are sent the Lottery pack in the post are sent a maximum of five books (50 tickets) which equate to 50 chances. Each ticket is £1 and constitutes a Chance. Tickets can be paid for by cash, cheque or Maestro/Visa/Mastercard card. Supporters can also request an additional four books (40 tickets/chances) over the phone through Supporter Care per transaction. A maximum of 150 tickets can be purchased per lottery via the Supporter Care team. However, the maximum number of tickets that can be bought by anyone person per lottery is restricted to 150 in total.
A report to show high volume ticket buyers is run at the end of each Lottery and checked to see if tickets are purchased by the supporter or by people that the supporter has given their tickets to. High volume purchases would be monitored if identified.

4.1. If you no longer want to receive our lottery mailings

You can request to be removed from all future Lottery mailings or to limit the number of books of tickets sent to you, at any time by contacting the RNLI’s Supporter Care team on 0300 300 9990.

This change is added to our database within two working days and then stays on the system unless a later request to remove it is made.

4.2. Self-Exclusion

If you want to self-exclude from the RNLI Lottery due to gambling problems, you can complete a Self-Exclusion Form which results in the exclusion from all future Lottery mailings including emails. This form is available from our website www.rnli.org/lottery or by calling our Supporter Care team on 0300 300 9990. This exclusion must last for a minimum of six months but no longer than 12 months. You can also request to be excluded from already paid up draws that have not yet been drawn.

Any self-exclusion may, on request, be extended for one or more further periods of at least six months at a time.

If you decide to self-exclude, you will be given the opportunity to do so immediately without any cooling-off period. However, if you wish to consider the self-exclusion further (for example to discuss with problem gambling groups), you may get back to us at a later date to complete a Self-Exclusion Form.

At the end of the exclusion period chosen by yourself, the self-exclusion remains in place for a further six months, unless you take positive action in order to gamble again.

When you choose not to renew the self-exclusion and you make a positive request to begin gambling again during the six month period following the end of your initial self-exclusion, you will be given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone, email or writing and with details we have recorded in your supporter record on the RNLI database. If you call to make any such request to begin gambling again, then you will need to follow it up with a written confirmation either by letter or email.

Notwithstanding the expiry of the chosen period of self-exclusion, no marketing material will be sent to you unless and until you have asked for or agreed to accept such material.
4.3. Information on Responsible Gambling

The Lifeboat Lottery is a quarterly draw, which is seen by our supporters as a way of supporting the RNLI. However, as a Lottery provider (Lotteries are classified as a form of gambling) it is a requirement of the RNLI to provide information on where help is available if you are concerned that you may have a problem with gambling.

Typical behaviours of responsible gambling that is under your control include:

- Moderate gambling
- Gambling only with money you can afford
- Quitting while you are ahead
- Setting limits on how much time and money you can afford to spend
- Having fun, or supporting a charity, not investing your money
- Not spending more than you can afford, hoping to win back previous losses
- Not letting gambling take over your life
- Not gambling because you are stressed or bored

The vast majority of people gamble responsibly, for some however, gambling can become a problem. If you have concerns about your gambling habits, or those of someone close to you, there is friendly advice available from trained counsellors at BeGambleAware. You can call the National Gambling Helpline on 0808 8020 133 or you can visit BeGambleAware.org for more information.

Talking about your concerns can be a big relief. If you are unsure whether a problem exists, please look at the questions below. If you answer ‘yes’ to the majority, you may wish to speak to BeGambleAware.

- Do you lie to cover up the time and money you spend on gambling?
- Do you gamble alone for long periods?
- Do you take time off from work or study to gamble?
- Do you use gambling as a way of escaping from boring or unhappy periods in your life?
- Do others criticise your gambling habits?
- Do you gamble after arguments, frustrations or disappointments?
- Do you gamble until you have spent every penny you have?
- Do you feel depressed about your gambling habits?
- Do you feel reluctant to spend your gambling money on other things?
- Have you lost interest in other aspects of your life (e.g. hobbies and friends) because of gambling?
- Have you lied or stolen/borrowed money to gamble or pay gambling debts?
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