



Policy Title

RNLI External Lottery Policy

Policy Owner

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Individual Giving – Lottery Team

Last Updated

April 2024

Next Review Date

Sept 2024

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.

Contents of Policy

1. Our Pledge to our Supporters
2. Complaints Procedure
3. Policy on Fair and Open Draws
4. Policy on Responsible Gambling (Social Responsibility) and Self-Exclusion
5. Policy on Underage Gambling
6. Policy on Selling Tickets in Public

Policy

1. Our pledge to our supporters

a) Customer Service

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 its service

As a member of the Lotteries Council and the Independent Betting Adjudication Services Limited (IBAS), we aim to promote the fundraising promise wherever possible.

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- 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

b) Vulnerable People

The RNLI is committed to protecting vulnerable people and our staff and volunteers are trained to spot the signs of vulnerability and undertake the relevant safeguarding training.

c) Advertising Codes

RNLI complies with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) to ensure that our marketing is legal, decent, honest and truthful, not misleading or exaggerating; socially responsible; in a way that does not exploit young and vulnerable people.

d) We comply with the Gambling Commission requirements

This includes abiding by the draw proceeds limit, the annual aggregate proceeds limit and the maximum individual prize limit set by the Gambling Commission.

e) Change management

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 our Non-Remote and Ancillary Remote Gambling Licences issued are adhered to.

The RNLI reviews all its lottery related policies and terms and conditions on a regular basis.

If you want to keep up to date with any changes, you can register to receive the Gambling Commission's e-Bulletins via the following link:

<https://www.gamblingcommission.gov.uk/e-bulletin>

2. Complaints Procedure

2.1 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.

2.2 What to do if you have a complaint

Step 1 - You can make a complaint about the RNLI by telephone, in writing, by 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 directly to them in the first instance.

All complaints should be received by the RNLI within six months of the date of the incident. We 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. The complaints process should take no longer than eight weeks from when the supporter complaint is first received and this period will only be extended in the event of the circumstances beyond the RNLI's control.

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: SupporterExperience@rnli.org.uk or visit: <https://rnli.org/about-us/contact-us/give-us-your-feedback/your-comments-feedback-and-complaints>

Step 2 - If you are not happy with the initial response you receive, you can appeal it by contacting our Complaints Coordinator, Mrs Alison Murphy on alison_murphy@rnli.org.uk.

Step 3 – If you are still not satisfied with our response, you can ask for your complaint to be referred to the Chief Executive of the charity.

Step 4 - If you remain unhappy with the RNLI'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:

Independent Betting Adjudication Service
PO Box 62639
London
EC3P 3AS
Tel: 020 7347 5883
Email: adjudication@ibas-uk.co.uk

2.3 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

- 3.1 You can purchase entries for the RNLI Lifeboat Lottery by post or over the phone. Each £1 entry you purchase is entered into our electronic draw. You may purchase up to a maximum of 150 entries per transaction and up to a maximum of 150 entries per person in total per lottery.
- 3.2 Our lottery packs are addressed and mailed to individual supporters to enable us to meet each individual player's needs. However, for joint records on the RNLI supporter database, each individual may purchase up to a maximum of 150 entries per lottery (300 entries per joint RNLI database record if the record

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includes 2 individuals). The maximum of 150 entries per transaction still applies.

3.3 Extra ticket books can be requested for you to sell to your friends and family members (who are 18 years old or over) by calling our Supporter Experience team on 0300 300 9920 or emailing lottery@rnli.org.uk. Due to the way our system operates, these tickets are linked to your supporter record and therefore count towards your maximum of 150 entries per person per lottery.

3.4 Checks are conducted during each lottery to ensure that all Lifeboat Lottery supporters are within the transaction limit and entry limit. Any entries above the 150-entry limit will be refunded and withdrawn from the lottery draw.

3.5 Only individuals can play the lottery – organisations are not permitted to play.

3.6 How to enter the Lifeboat Lottery:

a) Postal entries

If you are an existing supporter, you may receive lottery tickets in the post. Tickets cost £1 each and are sent out in books of 10 and you will receive a maximum of 5 books. Further books may be requested by contacting the RNLI Supporter Experience team on 0300 300 9920 or emailing lottery@rnli.org.uk (subject to the maximum explained above). To enter the lottery by post, complete the Response Form and send it back to us along with your payment (no need for you to return the Ticket Stubs as we identify your entries using your supporter number).

- If you are selling tickets to friends and family and purchasing some yourself, please complete all contact details on the Ticket Stubs and send these to us along with the Response Form and payment. All entries must be submitted by posting the Entry Form, payment and any Ticket Stubs to: RNLI, West Quay Road, Poole, BH15 1HZ. All entries must be with us by the published Lottery close date. Any money received after the closing date will be treated as a donation.
- Payment can be made in one of the following ways:
 - i. By cheque or postal order made payable to RNLI (Sales) Limited;
or
 - ii. By completing your card details on the Response Form

Due to internal processing, credit card payments will go through RNLI, which will then be transferred to RNLI (Sales) Ltd.

b) Telephone entries

- Over the phone you can make your payment by debit card. We cannot accept credit card payments for lottery ticket purchases

You can purchase entries on debit card only by calling our Supporter Experience team on 0300 300 9920. Payments go through to RNLI (Sales) Ltd and at the end of the year, any profits are donated to RNLI.

If you decide to make a donation alongside your payment for the lottery entries, all the donations received in connection with the RNLI Lifeboat Lottery will be paid into RNLI.

3.7 Other considerations:

- All monies received are handled in a locked and secure environment.
- Winners are chosen at random by using a Random Number Generator whereby the entries are put into an electronic data table in random order. The screen shows rolling numbers (not discernible), and winners are selected by a user clicking stop at any time. The Random Generator Software we use has been tested and approved by an independent test house approved by the Gambling Commission.
- We will endeavour to notify the winner by phone, email or post within 5 working days of the draw date.
- Winners will be published online at www.rnli.org/lottery and may be published in *Lifeboat* magazine or in other promotional material for subsequent lotteries. The winners' details will be in summary form i.e. Mrs [surname] from [county/ town]. We would also look to publish any image and/or quote from the winners, subject to them being happy with providing us with this information and consenting that we publish it.
- Any lottery entries that arrive after the published "closing date" of a lottery, or where the returned response form is not completed in full, won't count and as stated in the Lottery's Terms & Conditions (RNLI.org/LotteryTandCs), the payment will be treated as a donation to the RNLI.
- Should a returned response form not be legible or completed in full, making it impossible for us to distinguish whether the intention is to purchase a lottery ticket or to make a donation, then any accompanying money will be treated as a donation.

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

- 4.1 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.

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 GambleAware via its membership of the Lotteries Council.

Supporters can request additional books over the phone up to the limit of 150 per transaction. An overall maximum of 150 lottery tickets per person can be purchased in total per lottery (in case of a joint RNLI database record, each individual on record can purchase up to a maximum of 150 tickets). Due to the way our system operates, extra tickets requested for selling on to friends and family members also count towards this 150 ticket limit as they are linked to the requesting supporters record.

We have procedures in place to minimise the risk of money laundering and to promote responsible gambling which are set out below.

We also run a report after each lottery on the amount of sold and unsold tickets and will make this available to the Gambling Commission if and when requested.

Where a supporter is identified as a possible problem gambler, we will endeavour to interact with the supporter to advise them to take a break from their gambling or contact BeGambleAware for support where appropriate. The handling of each case will be monitored and evaluated to ensure we have the best process in place for these situations.

4.2 Self-Exclusion

If anyone wishes to self-exclude from the RNLI Lottery they can complete a Self-Exclusion Form which results in the exclusion from all future Lottery mailings including emails. The self-exclusion will be applied to their record within two days of us receiving the form. The form is available from our website www.rnli.org/lottery or by calling our Supporter Experience team on 0300 300 9920. The exclusion must last for a minimum of six months. If they self-exclude after they have bought tickets for the Lottery but before the draw takes place, we will endeavour to provide a refund and withdraw their entries. Someone who has self-excluded must forfeit any prize.

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

At the end of the six-month exclusion period, the self-exclusion remains in place unless they take positive action in order to gamble again. During the exclusion no lottery marketing material will be sent to them.

If they make a positive request to begin gambling again following the end of the initial six-month self-exclusion period, they will be given one day to cool off before being allowed to start gambling again. The contact must be made via telephone, email or writing and with details we have recorded in their supporter record on the RNLI database. If they call to make any such request to begin gambling again, then they will need to follow it up with a written confirmation either by letter or email.

Anyone can seek advice and support from trained counsellors at BeGambleAware by calling the National Gambling Helpline on 0808 8020 133 or visiting their website BeGambleAware.org. Software is available to prevent an individual computer from accessing gambling internet sites – please see www.gamblock.com for further information.

4.3

Proceeds of Crime Act 2002 and procedures for anti-money laundering and terrorist financing

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Below are the practices we have in place for mitigating the risk of money laundering and terrorist financing. Each entry costs £1, data on past lotteries shows that on average players spend £16 per lottery on ticket sales (based on 2022 records).

- All money received is set against player's records stored on the database.
- Staff are trained to look out for any suspicious activity relating to purchase of the Lottery tickets.
- Should anyone try to place multiple transactions for lottery entries over the phone with Supporter Experience, then their purchasing behaviour will be monitored by Supporter Experience. Supporters can purchase 150 entries in any one transaction and the total number of entries already bought for the lottery will be reviewed to ensure it is not greater than 150 in total per person per lottery, before any further transactions are processed. This includes extra ticket requests for the supporter to sell on to friends and family as these tickets are linked to the selling supporters' record.
- Should anyone attempt to buy more than 150 entries, through multiple transactions over the phone with Supporter Experience, then this would be picked up by the Supporter Experience team and the issue flagged with the Lottery team to be investigated.
- A report is run at the end of each lottery to identify if anyone has managed to buy more than £150 worth of lottery entries. If anyone is identified, we will endeavour to refund and withdraw the entries over the maximum limit before the draw is run. There is also a check on the total volume of tickets being sent per supporter and a report on if they haven't purchased the tickets. Any suspicious activity will be flagged, and the lottery team will investigate. If more than 150 tickets are received from a single supporter in one mailing, this would be investigated to check that the ticket limit has not been reached.
- A report is run at the end of each lottery to identify anyone who has bought multiple entries or made donations and asked for a refund. This report is also run cumulatively looking at the four previous lotteries to identify any patterns of concern. Anyone who is identified will be contacted to verify intent.
- No person is allowed to participate in the Lottery if they are suspected of criminal activities.
- Any transaction will be frozen that appears to be suspicious and any other transaction made by the same player.
- As the lottery is a fundraising tool for the RNLI, any donations are not refundable apart from very limited circumstances specified by the Charity Commission.
- Any unusual patterns of transactions will be investigated.
- Any suspicious patterns will be reported to the RNLI's Internal Auditor for further action and when appropriate, would then be reported to the National Crime Agency via a SAR (suspicious activity report), as well as the Gambling Commission.
- A risk assessment is conducted annually to assess and mitigate the risks of the charity being used for money laundering and terrorist financing.
- Only players residing in England (excluding the Channel Islands and Isle of Man), Scotland and Wales are permitted to enter the Lottery.
- A record of sold and unsold tickets is maintained and will be made available to the Gambling Commission if and when requested.

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4.4 If you no longer want to receive our lottery mailings

You can request to be removed from future Lottery mailings or to limit the number of books of tickets sent to you, at any time by contacting the RNLI's Supporter Experience team on 0300 300 9920 or lottery@rnli.org.uk

The change is added to our database and then stays on the system unless a later request to remove it is made.

4.5 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, it is a requirement of the RNLI (Sales) Limited as a Lottery provider (lotteries are classified as a form of gambling) 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 own 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?

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- Have you lied or stolen/borrowed money to gamble or pay gambling debts?

Software is available to prevent an individual computer from accessing gambling internet sites – please see www.gamblock.com for further information.

5 Policy on Underage Gambling

5.1 The RNLI has undertaken the steps below in order to minimise the risks of Lifeboat Lottery tickets being sold to under 18s.

- a. All Lifeboat Lottery tickets and response forms state that the player must be 18 years or over to play the Lifeboat Lottery or to sell on tickets.
- b. Tickets also state that if you are under 18, you will automatically forfeit any prize and we may be unable to provide any refund.
- c. Any player, who is subsequently found to be underage, will immediately be marked on the RNLI database to ensure they are not contacted again with regards to the Lottery.
- d. If there is a suggestion that someone may be underage, they will be contacted to verify their age.
- e. A programme of random age checks is conducted.
- f. All telephone players will be asked to confirm their age or year of birth.

5.2 Verifying the age of a ticket purchaser

When tickets are sold, in case of any doubt as to whether a person is 18 or over, we may request to see a proof of ID.

6. Policy on selling tickets in public

Under the terms of the RNLI's Licence Conditions & Codes of Practice from the Gambling Commission the following must be adhered to when selling tickets in public:

Tickets must not be sold to anyone in a street. For this purpose, a street includes any bridge, road, lane, footway, subway, square, court, alley or passage (including passages through enclosed premises such as shopping malls) whether a thoroughfare or not. Tickets can be sold in a street from a static structure such as a kiosk or display stand or door to door.

These terms do not apply to the sale of tickets at specific events, such as garden parties, fetes, fairs or other fundraising functions.

Related Policies, Procedures & Guidance

Gambling Commission Licence Conditions Code of Practice (LCCP)

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<https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/print/lotteries>

RNLI Lottery Terms and Conditions

<https://rnli.org/support-us/give-money/lifeboat-lottery/terms-and-conditions>

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