

SOCIAL RESPONSIBILITY POLICY – DEPAUL LOTTERY

Depaul and our External Lottery Manager (ELM), People's Postcode Lottery (PPL) are committed to ensuring that the Lottery is operated in a crime free, fair and open way as a socially responsible operator and to endorsing responsible gambling amongst its players. This document sets out our approach.

The Gambling Commission regulates gambling to ensure that:

- it is crime free;
- it is fair and open; and,
- children and vulnerable people are protected.

1. Preventing gambling from being a source of crime and disorder

When a player joins the Lottery:

- a. Depaul, through our ELM will check that the player is aged 16 or over; dates of birth must be provided at point of sale,
- b. Players must have a bank account or other age-verified payment methods, and
- c. Players must be resident in Great Britain; lottery tickets are dependent on the provision by a player of a valid GB postcode

2. To prevent fraud and criminal activity, Depaul, through our ELM:

- a. limits the number of subscriptions sold in one transaction is limited to three;
- b. only pays prizes back to the account used to pay for the winning subscription or an account verified electronically in line with our Prevention of Money Laundering and Terrorist Funding Policy;
- c. ensures draws are adjudicated by an independent legal representative and completed on a secure, standalone and certified draw engine;
- d. offers no cash subscriptions; and,
- e. reports suspicious activities to the Gambling Commission and to the Police, under the Proceeds of Crime Act 2002.

3. Ensuring that gambling is conducted in a fair and open way

Depaul, through our ELM ensures this through:

- a. players' funds are protected from insolvency, with lottery proceeds held separately from any other trading income and in approved accounts;
- b. promotion of draws in line with consumer law and follows the Committee on Advertising Practice and ClearCast guidelines;

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Patron Cardinal Vincent Nichols, President Sir Trevor MacDonald OBE, Registered Charity No. 802384 Depaul Housing Services registered with the Homes & Communities Agency No. C2683 Company Limited by Guarantee No. 2440093 (Registered in England and Wales). Registered Office: as Central Office

- c. providing players with access to clear information on matters such as the rules of the lottery and the prizes that are available, and providing notification of changes which are submitted to the Gambling Commission 28 days in advance;
- d. the provision of tickets clearly indicating the promoting society, details of the society, dates of the draw, price of the tickets and licensed by the Gambling Commission;
- e. A complaints process that is in place to deal with any issues in a clear and procedural way, including an option of Alternative Dispute Resolution.

4. Protection of children and other vulnerable persons from being harmed or exploited by gambling

- a. Our ELM works with regulated third parties that have a process for age verification
- b. Depaul and our ELM adheres to advertisement rules laid out by the Committee of Advertising Practice, summarised below:
 - i. To not encourage gambling that may lead to socially irresponsible acts or could lead to financial, social or emotional harm.
 - ii. To not exploit children or other vulnerable persons.
 - iii. To not suggest gambling can solve financial problems or debts.
 - iv. To not suggest gambling can increase attractiveness or sexual success.
 - v. To not link gambling to youth culture or attempt to attract young persons to gamble.
 - vi. A customer care process that creates an alert when a player subscribes with more than six tickets.

5. Underage Gambling

Gambling is illegal for individuals under the age of 16 to enter into a lottery. If for whatever reason, upon winning any individual is unable to prove that they are 16 or over then any winnings will be forfeited.

6. Gambling Limits

Depaul and our ELM imposes limits on the number of tickets purchased by an individual in a single transaction to three. For those subscribing to six or more tickets we will actively contact these individuals on a regular basis to discuss the number of playing subscription and reduce, where appropriate.

7. Guidelines for Responsible Gambling

Whilst the majority of people do gamble within their means, for some, gambling can become a problem. As part of our commitment to promoting socially responsible gambling. The

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following guidance is provided on Depaul's and our ELM's website for the benefit of individuals who participate in our lottery:

- Gambling should be entertaining and not seen as a way of making money
- Avoid chasing losses
- Only gamble what you can afford to lose
- Keep track of the time and amount you spend gambling
- If you are concerned that gambling may have taken over your own or someone else's life, then please contact a service such as GambleAware, www.gambleaware.co.uk or 0808 8020 133, alternatively a full list of organisations which provide help and advice is available through the Gambling Commission website and select responsible gambling or [click here](#).
- If you want to have a break from gambling, you can use our self-exclusion option by contacting us

8. Self-Exclusion

Depaul, through our ELM must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. The minimum self-exclusion period offered for non-remote gambling is of a duration of not less than 6 and no more than 12 months. In terms of remote gambling the minimum self-exclusion period is 6 months up to 5 years. At the end of the period, the self-exclusion remains in place, unless the customer takes positive action in order to gamble again.

No marketing material should be sent to the individual unless the individual has taken positive action in order to gamble again, and has agreed to accept such material. Where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again, the customer is given 24 hours to cool off before being allowed to reactivate their play. (see Self-Exclusion Policy)

9. Access to Player History.

Depaul, through our ELM will provide any player with a full history of their Lottery subscription, including complete payment and winnings history upon receipt of a Subject Access request.

10. Provide Information on gambling support organisations.

On our website we provide a clickthrough logo to the BeGambleAware website. In the event that a player feels their level of gambling is causing difficulties, our customer service team will actively refer them to these services.

11. Staff Training

In respect of internal training, Depaul confirms that:

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- Our commitment to being a socially responsible operator is covered in our employee induction process for key senior staff and Annex A holders. Our ELM covers this across their whole staff team;
- All Annex A holders at Depaul are regularly trained on an annual basis and made fully aware of our social responsibility policies and best practice approaches to identifying and tackling problem gambling;
- Our ELM's Customer Service team receives additional training in respect of identifying vulnerable or at risk players.

12. REVIEW

This policy will be reviewed on an annual basis.

Date: 31 March 2017

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