

**Responsible Gambling and Self-Exclusion Policy**

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| Approved By | Lottery Committee |

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# Introduction

This policy should be read in conjunction with The Friends of No1 CopperPot Anti Money Laundering Policy and the Credit Union’s Data Protection Polices, Anti-Bribery Policy, and Vulnerability Policy.

What is Responsible Gambling?

Responsible Gambling is an overall concept that any form of gambling should uphold the principles of the Gambling Act and should also be conducted safely and responsibly so that gambling can be enjoyable but never harmful to individuals or their families.

The three objectives of the Gambling Act are:

* preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime.
* ensuring that gambling is conducted in a fair and open way.
* protecting children and other vulnerable persons from being harmed or exploited by gambling.

Gambling can be a fun and enjoyable form of entertainment, however if not properly managed individually or as the promoter, it can lead to negative consequences. Members should always be made aware of the odds or chances to win, all the terms and conditions and should be encouraged to only play with what they can afford, and an amount which they find enjoyable to gamble with.

Our policy is to take a considered approach to offering support to any members. For example, recognising the signs of problem gambling and protecting potentially vulnerable members, and to be aware of this whilst proceeding to promote any gambling activity.

No1 CopperPot will offer support and help to anyone who requests it, and to anyone who is or appears to be affected by problem gambling in a confidential, transparent, and compassionate way.

The Friends of No1 CopperPot Lottery Committee require that its volunteers, marketing support and Credit Union colleagues uphold the values of this policy and comply with the Gambling Act 2005 and the Licence Conditions and Codes of Practice as provided by the Gambling Commission, and that they understand and enforce the importance of socially responsible gambling.

# Prevention of Crime & Disorder

The Friends of No1 CopperPot Credit Union Lottery Committee will prevent gambling activity that it promotes from being a source of, or a support to, crime and disorder. It will do so by minimising the stakes which members can enter in the lottery which is currently a maximum of £10 per month. It will also ensure that proceeds from the lottery are only paid directly into a member’s Credit Union Member Account.

All member facing personnel should immediately report to the Friends of No1 CopperPot Credit Union Lottery Committee and the Chief Executive Officer (CEO) of No1 CopperPot Credit Union if they have any concerns or suspicions regarding criminal activity related to the lottery.

# Anti-Money Laundering

The Friends of No1 CopperPot Credit Union Lottery will abide by their Anti Money Laundering (AML) Policy. All members of the lottery undergo the relevant know your customer (KYC) and identity and address verification checks when they join the Credit Union. This is completed by staff who abide by the Credit Unions AML policy as well as The Friends of No1 CopperPot Credit Union Lottery AML Policy. Both these policies run in conjunction with each other to ensure consistency and compliance with the regulatory requirements. Only members of the Credit Union are eligible to play the lottery.

For further information please refer to the The Friends of No1 CopperPot Credit Union Lottery AML Policy.

# Fair & Open Gambling: Clear and transparent language and marketing

The Friends of No1 CopperPot Credit Union Lottery Committee believe in ensuring that promotion of the lottery is done in a fair, open, and compliant way. They require all marketing of the lottery to be done in a socially responsible manner. They require any advertising to comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable.

All materials must be written in clear and plain English and easy to understand. The terms of the lottery must be made clear and available in advance to all members.

All member facing personnel must be trained on compliance and the Consumer Protection from Unfair Trading Regulations and are required to conduct marketing activity adhering to these guidelines.

Any members wishing to gain further information about the lottery should be directed to the terms and conditions, referred to The Friends of No1 CopperPot Credit Union Lottery Committee or the Credit Union.

For further information please refer to the Friends of No1 CopperPot Credit Union Lottery’s Marketing Policy.

#  4. Protecting Children & Young Persons

The Friends of No1 CopperPot Credit Union Lottery Committee’s policy is to ensure that only persons aged 18 or over are permitted to enter the lottery it promotes. Each member’s age is affirmed as it is linked to their Credit Union account and therefore the member has been subject to an identity verification check when joining.

All marketing and promotional literature adequately and effectively advertises the minimum legal age limit.

# 5. Protecting the Vulnerable

The Friends of No1 CopperPot Credit Union Lottery Committee’s policy is that members who are vulnerable or potentially vulnerable should be protected from the potential harm which can be caused by gambling. Members who are vulnerable or potentially vulnerable should not be approached or signed up to the lottery.

Vulnerability in the context of lotteries can take many forms: including but not limited to someone who cannot make an informed decision, or who has a lack of understanding of the lottery or if they are not fluent in English, someone who cannot afford to enter a lottery, someone who is elderly or very young and not able to make their own financial decisions, someone who wants to gamble too frequently or with high stakes, or someone who is distressed or under pressure.

All member facing personnel in the Credit Union are trained on how to recognise and respond to vulnerability. Training and assistance for colleagues in supporting and identifying vulnerable members includes but is not limited to: -

* Training to listen for triggers, signs of vulnerability, and indictors of financial or economic abuse, including things such as a member discussing increasing time pressures due to additional responsibilities, members seeming pre-occupied and not fully engaged in the conversation, showing signs of not fully understanding the broader implications of joining the lottery,
* Telephony staff are under no pressure to end calls within a specific timeframe, and thus should they deal with a member exhibiting potential vulnerable characteristics they have the required time to explore their needs and ensure joining the lottery is the best outcome for the member,
* All staff of the Credit Union undertake yearly training on vulnerability, both in the form of computer based learning and periodic interactive sessions,
* The Credit Union acknowledges and advocates that quality conversations with members are the key to success in providing the best outcomes for members,
* Any wish for further training in this area is readily available either on request or if deemed necessary by the relevant line manager,
* Sharing relevant briefings or training materials, from external bodies, with staff
* Giving staff opportunities to share knowledge and experiences with other colleagues to help improve the level of support and increase understanding of how to take into account vulnerable members when performing their duties,
* As most Credit Union business is conducted online or on the telephone all staff are made aware they can invite a member in or arrange a video call to provide them with an explanation of the lottery via a different medium is this is more suitable for the member.

As colleagues within the Credit Union deal with members joining the lottery or making changes they adhere to the No1 CopperPot Credit Union Vulnerability Policy.

# Member Interaction

Member interaction is about how to react if a member is identified as being at risk of developing problems with their gambling, or who exhibit suspicious behaviour, appear vulnerable, or who simply wish to exceed the pre-set limit of entries.

The Friends of No1 CopperPot Credit Union Lottery Committee’s policy is to train and educate all member facing personnel on responsible gambling and how to collectively spot this and support individuals who may have a problem with gambling, or how to report any concerns. Training provided encapsulates developing skills to recognise ‘soft’ behavioural triggers, which, whilst not obvious, may indicate the member requires further support. This includes: - signs of agitation, tone of voice when requesting to increase their lottery entries, particularly when refused, a ‘defensive’ response when asked additional questions about increasing lottery entries, appearing to relieve ‘big wins’ when interacting with a colleague.

Triggers can also come in the form of certain account activity, which the Credit Union train staff to identify. While usually far less obvious than explicit spoken words, they can be used as useful indicators that someone may be suffering from a gambling problem. Examples of these are payments stopping suddenly, late or missed payments, regular unarranged overdrafts and charges, unusual activity on an account.

If any interaction causes concern, then the Credit Union colleague will pass the information to a manager. This will include a full explanation of the cause of concern and the discussions which have already taken place. Upon receiving the report the manager will assess and analyse the circumstances and make a judgement as to whether it is appropriate to suggest to the member that they might want to be provided with information regarding where they can seek professional advice about the nature of their gambling activity or have the process of self-exclusion explained for consideration. If the member refuses such information the manager may give consideration to refusing service. All such interactions will be recorded for reference in any future interactions and will be reported to the Friends of No1 CopperPot Credit Union Lottery Committee.

To ensure the best outcome for the Credit Union and to mitigate any risks of problem gambling, no more than 10 entries per member can be sold to a member at any one time or cumulatively, and it is not possible for a member to exceed this limit.

# Self-exclusion

While subscription-based society lotteries offer the lowest risk of problem gambling, we recognise that some players are unable to enjoy participation in such activity. All Credit Union staff are trained on the self-exclusion procedure as below.

Self-exclusion is a tool used by those who have recognised that their gambling is harmful to them and wish to be supported to stop gambling. People in this position can take steps to remove themselves from gambling whether online or in a premises. To do this they would enter into a formal agreement not to gamble, and it is up to them to then stick to the self-exclusion. If they try to gamble during that time, the gambling business must take reasonable steps to stop them.

The Friends of No1 CopperPot Credit Union Lottery Committee supports any members who wish to self-exclude and restrict their own gambling and will ensure that those options can be discussed in a private and wherever possible confidential manner between the member and a colleague.

The Friends of No1 CopperPot Lottery Committee’s policy is to ensure that any members who do wish to self-exclude are made aware of the process and the repercussions, including:

* Self-exclusion can be requested by contacting the Credit Union and requesting this, an immediate withdrawal of entries will be completed, and the file marked accordingly to ensure that this cannot be changed.
* Anyone requesting self-exclusion can choose to do so for a minimum period of 6 months or up to 5 years.
* Members will be informed of their responsibility to provide full and accurate personal details, now and in the future, so as to ensure the restriction to the services is maintained. If an individual does choose to self-exclude all reasonable endeavours will be used to ensure this is complied with. However, in agreeing to self-exclude the individual must accept that they have a parallel undertaking not to seek to circumvent the self-exclusion.
* They will be directed to organisations which can offer further help, support and information, i.e., BeGambleAware, GamCare and the National Gambling Helpline.
* They will be advised to consider self-excluding via a multi operator self-exclusion scheme. GAMSTOP allows them to self-exclude from online operators with one request and this will be encouraged.
* If during the course of the conversation it is identified the issue is not solely with online gambling, they will be made aware of the option to self-exclude using a multi operator scheme who can help them to do this for the same type of land-based gambling within their area.
* It is binding and irrevocable for at least 6 months once the member confirms their wish to self-exclude. If a member requests to revoke the self exclusion this will be refused.
* Only a positive action by the member after the initial period of 6 months will mean the member can then take part in a lottery which the Friends of No1 CopperPot Lottery Committee manages. A member must make a formal request to have it removed and can only ask for it to be removed by speaking to a member of the committee or a manager of the Credit Union. After the request the member will enter into a 48-hour cooling-off period. This means they will not be allowed to enter the lottery until a further 48 hours has passed. After the 48 hour period they will need to recontact the Credit Union to request entry into the lottery. Members coming out of self-exclusion will be capped at 50% of the allowed entries therefore, a maximum number of entries will be 5 for a further 6 months.
1. **Problem Gambling: What to do if you or a friend’s or family member’s gambling becomes a problem?**

The Friends of No1 CopperPot Lottery Committee’s policy is to help and support any individuals who require any assistance but particularly those who require assistance with their gambling. It will be done by promoting the work of specialised organisations who can assist individuals and their families with problem gambling. These conversations are welcomed and will be handled sensitively and confidentially.

If member facing personnel have any concerns about an individual’s gambling, or if a member of the public raises concerns about a friend’s or family member’s gambling, the Friends of No1 CopperPot Credit Union Lottery Committee will provide information to them about getting in touch with organisations who can confidentially discuss the matter with them, such as BeGambleAware, GamCare and the National Gambling Helpline.

# Complaints

The Friends of No1 CopperPot Credit Union’s Lottery Committee is committed to upholding a high standard of member service with the public. If any member of the public is concerned or has any feedback regarding the method of promoting the lottery or the lottery campaign itself, it can contact the Friends of No1 CopperPot Lottery Committee to raise its concerns at info@no1copperpot.com. All communications will be passed on to the Lottery Committee Chair, Paul Kelly.

All complaints and feedback will be treated individually, professionally and will be acknowledged and initially responded to within 48 hours.

Any disputes will be managed through the Independent Betting Adjudication Service. (IBAS)

We have appointed ADR Group Limited

1st Floor, 83 High Street

Rayleigh, Essex

SS6 7EJ

Website: [www.adrgroup.co.uk](http://www.adrgroup.co.uk)
Contact number: 0203 600 5050

# Information Sources

The following organisations can provide specialist advice and support to enable responsible gambling and to assist in the case of problem gambling:

* BeGambleAware – www.begambleaware.org
* GamCare – www.gamcare.org.uk
* National Gambling Helpline – 0808 8020 133

**Self-Exclusion**

* GAMSTOP - Online gambling (via websites and/or apps) - <https://www.gamstop.co.uk/>
* MOSES - Betting shops - 0800 294 2060
* SENSE - Casinos - <https://www.senseselfexclusion.com/>
* The Bingo Association - Bingo premises - The need to register either in-person at a licensed bingo premises or by telephoning the premises directly.
* BACTA - Adult gaming centres, high street arcades, motorway service areas, family entertainment centres - 020 3930 9769
* SmartEXCLUSION High street bingo, motorway service areas, holiday parks - 0844 884 3433.

# 10. RET contributions

The Friends of No1 CopperPot Credit Union Lottery Committee are required to make an annual financial contribution to organisations which deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling (RET contributions). At this time there is no set amount which has to be contributed.

At the end of the financial year, which is the 30th of September, 1% of net ticket sales will be issued to Young Gamers & Gamblers Education Trust (YGAM). This is a charity who support in the research and prevention of gambling addiction.

This will be sent once all accounts have been agreed and the evidence of this will be retained and sent to the Gambling Commission as part of the required return.

# 11. Policy Review

This policy will be overseen by the Friends of No1 CopperPot Credit Union Lottery Committee and updated as and when required to reflect changes to the Gambling Commission’s Licence Conditions and Codes of Practice. It will be approved and reviewed annually by the Lottery Committee.