

# General & Socially Responsible Gambling Policy

## Introduction

Marie Curie operates a Society Lottery for the general public across Great Britain, for the sole purpose of raising funds for Marie Curie Cancer Care, a charity registered in England & Wales (207994) and Scotland (SC038731).

Marie Curie is committed to ensuring that the lottery is operated in a secure, fair and socially responsible way and to endorse responsible gambling amongst its members.

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on three licensing objectives:

- 1) Preventing gambling from being a source of crime and disorder, being associated with crime and disorder, or being used to support crime;
- 2) Ensuring that gambling is conducted in a fair and open way;
- 3) Protecting children and other vulnerable persons from being harmed or exploited by gambling.

This document sets out Marie Curie's policies and approach to promoting the Marie Curie Weekly Lottery and Raffles in a socially responsible way. This policy is also available to members of the public.

This document sets out Marie Curie's policies and approach to ensuring we approach any gambling activities in a socially responsible way.

Marie Curie will;

- Only participate in initiatives associated with gambling organisations if that organisation is licensed by the Gambling Commission in the UK, is subject to the UK gambling laws, or is on the Gambling Commission's list of 'white-listed' territories.
- Only participate in, or develop, new gambling products or initiatives that can be shown to align with one or more of the Charity's specific strategic aims as defined by the Charity's Strategic Plan **and** one or more of the Fundraising Director's key objectives. These are currently:
  - Strategic Aims
    - Delivering growth;
    - Improving lives;
    - Securing the future;
  - Key Objectives
    - To increase Major Gifts, from individuals, corporates, and from trusts;
    - To raise significantly more income around each hospice;
    - To increase the capacity of all teams by harnessing volunteer support;
    - To increase Committed Giving;
    - To improve the stewardship of all supporters.

- Ensure that an identified individual within Marie Curie Cancer Care is charged with ensuring that any MCCC Game complies with the Gambling Commission's guidelines and regulations and the terms of any licences issued and acts as the Responsible Person.
- Proactively ensure that all employees and any volunteers directly associated with the Charity's licenced gambling products are aware of the procedures contained within this document and are sufficiently trained to operate or participate in operating Games in a Socially Responsible manner.
- Further develop this document in the light of future developments that might arise, particularly any further amendments to the Licencing Conditions and Codes of Practice.
- Ensure that any third party organisation engaged by Marie Curie Cancer Care to operate Games on the Charity's behalf have a suitable policy covering Socially Responsible Gambling.
- Further, Marie Curie will ensure that its Games and the processes and procedures used to manage its Game conform to our published policies with regard to cash handling, income processing, money laundering, staff selection (including CRB checks, where necessary), data protection and freedom of information.

## **Preventing gambling from being a source of crime and disorder**

Marie Curie will;

- Refuse to contract with potential suppliers or providers of Games if the charity has any uncertainties regarding any potential or actual criminal activities that may be associated with any individual or organisation.
- Refuse to be associated with the proposed structure and operation of any potential Games scheme or other gambling activity that could potentially breach the law.
- Utilise preferred suppliers of reputable status, taking into account previous experience, personal recommendations or subsequent investigations and analysis by the charity.
- Take up the references offered by prospective employees and volunteers, particularly for Finance and Administration staff.
- Maintain on-going monitoring of all staff, particularly with a view to their direct or indirect association with potential criminal activities, inclusive of restricted access to charity buildings and premises, passwords, safes, key safes, locked cupboards, computer networks and Internet access.
- Monitor all staff responsible for cash handling and Game payment processing.
- Refuse to enrol any potential Game Member into any Marie Curie Game scheme, if the charity has any uncertainties regarding any potential or actual criminal activities that a potential or current Game Member may be associated with.
- Cancel the membership or participation of any Game Member of whom we suspect criminal or fraudulent activity in relation to their Game participation.
- Record any incidents of suspected fraudulent or criminal behaviour, with relation to the game, for future reference.
- Communicate in writing with new and current Game Members, in order to keep them advised regarding their Game membership status and in particular regarding procedures associated with Game payments.

- Maintain independent cross checking and monitoring of all staff, particularly those with responsibility for cash handling and Game payment processing, by colleagues and staff from other departments.
- Endeavour to confirm the legitimacy of any potential Game members who wish to take out more than 25 Game Entries, at any one time or within any Game period.
- Ensure all Game Administration complies with the Proceeds of Crime Act. Penny Laurence-Parr, General Counsel, is the nominated officer to report suspicious activity to.
- Call the police if criminal activities are suspected.

## **Ensuring that gambling is conducted in a fair and open way**

Marie Curie will;

- Investigate any possible disputes over winnings expeditiously and notify all parties involved in the dispute of the findings.
- Various Winners lists will be published on Marie Curie Internet sites (and retained for a period of at least 6 months following the date of the respective draw) and made available to participants in writing on request.
- Ensure that all Marie Curie Cancer Care Games utilise a strict set of rules, which will be approved by the charity. These rules will be reviewed typically on an annual basis and will be permanently available to all potential and actual Game members.
- Always make the very best endeavours to ensure that any Game entries e.g. New Members' applications or renewal payments, received in the current week actually play in that week's Game.
- Monitor standard written communications between the charity and the Game members on at least an annual basis, even if Game scheme changes since the previous upgrade were not expected to have required any changes to the standard letters.
- Informally monitor non-standard written communications and verbal communication between staff and Game members.
- Publish rules for our Games on our website and the reverse of Game tickets. All entry forms will carry information on obtaining the full set of terms and conditions for the relevant Game.
- Make available printed versions of rules and terms and conditions on request.
- In the event of a complaint or dispute about winnings, our Fundraising Complaints Procedure is followed. Upon escalation, should the complaint or dispute not be resolved, we will seek the assistance of the independent arbitration service offered through our Lotteries Council membership.
- All breaches of the Gambling Act (2005) and the Licencing Conditions & Codes of Practice will be kept by the Responsible Person.

## **Ensuring that children and other vulnerable persons will be protected from being harmed or exploited by gambling**

Marie Curie will;

- Ensure that all forms of Game membership application e.g. paper based or electronic Game Application Forms, contain a prominent declaration statement to the effect that the

prospective member is 16 years or over. The minimum age for play will be detailed on all tickets and entry forms.

- Reserve the right to ask for proof of age from any customer, and customer accounts may be suspended until satisfactory proof of age is provided. If for whatever reason, any individual suspected of being under the age of 16 upon winning, will need to provide proof of their age or any winnings will be forfeited.
- Ensure that the rules for Games adequately and effectively advertise the legal age limits.
- Require all sales staff to ask new Game members to confirm that they are over the age of 16 before continuing their application.
- Advise all staff to politely refuse to accept any Game entries from children who have been discovered to be under 16, explaining that the operation of the Game is covered in law by the Gambling Act 2005, which prevents any person under that age from taking part in any gambling activities.
- Informally monitor non-standard written communications and verbal communication between staff and children who have been discovered to be under 16.
- Ensure that all data used from our existing database for the purpose of supplying Game tickets excludes anyone under the legal age limit of 16 years.
- Any participant who provides dishonest information regarding their age will automatically forfeit the right to any prize.
- Any participant who is found to be under 16 years of age will have any monies paid for their Game tickets returned to them.
- All attempted breaches of underage gambling will be recorded.

## **Self-exclusion from Games or promotion**

Marie Curie will;

- Continue to recognise the need to provide a mechanism for members of the public or Game Members to exclude themselves from further participation in Games or the marketing thereof.
- On request, close any player's game memberships for a minimum period of six months. No further tickets or Game correspondence will be sent until the Game Member requests to revoke their self-exclusion. We will not revoke a self-exclusion until a period of six months has passed since the exclusion was requested. We reserve the right not to revoke a self-exclusion where we suspect problem gambling.
- All self-exclusions will be recorded.
- In the event that we receive a request from a vulnerable person's carer we will record this information and act upon it. Should the person have been sent one of our Game packs as a result of their details being supplied to us through a cold list, we will make every effort to have that person's details removed from the list owner's mailing records.
- We will provide any Game member with a full history of their membership, including complete payment and winnings history upon request.

## **The promotion of socially responsible gambling**

Marie Curie will;

- Remain committed to financially supporting efforts to tackle problem gambling, through continued membership of the Lotteries Council, which makes a contribution to the Responsible Gambling Trust on behalf of all members. The Responsible Gambling Trust raises funds to support its research, education, and the treatment of problem gambling.
- Ensure that all forms of Game membership application e.g. paper based or electronic Game Application Forms, contain information about places to get help for problem gambling from.
- Ensure that the rules for Games adequately and effectively provide information about where people can get help for problem gambling from.
- Ensure that all paid up entries into a Game receive an equal chance of winning.
- Advise all staff involved in Game promotion to politely refuse to accept any Game entries from suspected problem gamblers and ensure that all staff involved in Game promotion know where suspected problem gamblers can get assistance from.
- Advise staff to postpone potential acceptance of any Game entries from prospective Game members who are suspected of being under the influence of drink or drugs or who are incoherent and potentially senile, or indeed potentially suffering from a mentally related illness. Staff could for example advise potential Game members to complete an Application Form later, at their leisure, possibly utilising the help of a family friend or relative.
- Informally monitor non-standard written communications and verbal communication between staff and suspected problem gamblers, or those suspected of being under the influence of drink or drugs or who are incoherent and potentially senile, or indeed potentially suffering from a mentally related illness.
- Endeavour to confirm the legitimacy of any potential Game members who wish to take out more than 25 Game Entries at any one time or within any one Game period.
- Incorporate on our website, all our policies and procedures about our Games. Within this section we will display the pages about responsible gambling and include the helpline and website details for organisations such as GamCare for people to refer to should they need further help with problem gambling.
- We make it clear in writing that anyone who receives our Game tickets may ignore them. If they do not wish to be included in any future Draws, this information can be captured on our database.
- Abide by the following statements:

### ***Responsible Gambling***

Whilst the majority of people do gamble within their means, for some gambling can become a problem. It may help you to keep control to remember the following:

- 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 want to have a break from gambling you can use our self-exclusion option by emailing us at [gaming@mariecurie.org.uk](mailto:gaming@mariecurie.org.uk) with your name, address and membership number(s). We will then close your membership(s) for a minimum period of 6 months, during which time it will not be possible for the account(s) to be re-opened for any reason.
- If you need to talk about problem gambling then please contact Gamble Aware,

a registered charity that provides confidential telephone support and counselling to anyone who is affected by problem gambling. Gamble Aware can be contacted on 0808 8020 133 (Freephone).

### ***Problem Gambling***

If you are concerned that gambling may have taken over your (or someone else's life) then the following questions may help you find out:

- Do you stay away from work, college or school to gamble?
- Do you gamble to escape from a boring or unhappy life?
- When gambling and you run out of money, do you feel lost and in despair and need to gamble again as soon as possible?
- Do you gamble until your last penny is gone, even the fare home or the cost of a cup of tea?
- Have you ever lied to cover up the amount of money or time you have spent gambling?
- Have others ever criticised your gambling?
- Have you lost interest in your family, friends or hobbies?
- After losing, do you feel you must try and win back your losses as soon as possible?
- Do arguments, frustrations or disappointments make you want to gamble?
- Do you feel depressed or even suicidal because of your gambling?

The more you answer 'yes' to these questions, the more likely you are to have a serious gambling problem. To speak to someone about this contact the Gamble Aware confidential helpline on 0808 8020 133 or visit their website [www.gambleaware.co.uk](http://www.gambleaware.co.uk) for further information.

## **Definitions**

In order to ensure a consistent organisation-wide approach, the following definitions have been adopted by the charity:

- Game – includes Lotteries, Raffles and Games of Chance that are regulated by the UK Gambling Commission under Marie Curie's Large Society Remote and Non-Remote Licences.
- MCCC Game – any Game operated by Marie Curie or on behalf of Marie Curie.
- Remote Game – An MCCC Game in which persons participate by use of remote communication including telephone and digital channels.
- Non-remote Game – An MCCC Game in which persons are invited to participate through a face-to-face discussion with Marie Curie staff or volunteers acting as agents for Marie Curie, or through the mail.