

## Social Responsibility Policy

### Introduction

WaterAid currently holds a remote lottery licence and a non-remote lottery license as granted by the Gambling Commission under account number 4628. Under these licences we operate the WaterAid Raffle and the Postcode Lottery.

The WaterAid Raffle is managed by our External Lottery Manager (ELM) CFP Lottery and Raffles Ltd. and the Postcode Lottery is managed and marketed by our ELM the People's Postcode Lottery.

To play the WaterAid Raffle, players can enter online on the raffleplayer.com website, over the telephone, or by buying tickets sent to them in the post.

### The Regulation

WaterAid is committed to complying with the requirements of the Gambling Act 2005 and the Gambling Commission's<sup>1</sup> Licencing Conditions Code of Practice (LCCP). The Gambling Commission's regulatory framework is based on three licencing 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.**

To ensure we adhere to the Gambling Commission's objectives, see Appendix A for the policies and procedures that have been put into place.

### WaterAid's approach to socially responsible gambling

WaterAid aims to ensure that our gambling products are operated in a secure, fair and socially responsible way. Participating in the WaterAid raffle/lottery is a great way to support our work and offers the chance of winning some money. The vast majority of people participate for fun and gamble within their means, however, for some people gambling can become a problem. Although the risk of addiction to gambling may be small, we have developed this policy to support people to gamble responsibly and protect our supporters from gambling related harms.

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<sup>1</sup> The Gambling Commission license and regulate gambling in the UK:  
<https://www.gamblingcommission.gov.uk/home.aspx>

### Keeping gambling under control

- Gambling should not be seen as a way to make money, participation is for fun and to support charitable causes
- Set strict limits on what you can afford to spend on gambling and only gamble what you can afford to lose
- Keep track of the amount of time you spend gambling and do not allow gambling to interfere with other hobbies and social activities
- Do not chase losses in the hope you will win back what you may have spent

### Identifying when gambling has become a problem

For some people gambling can have a negative impact on their financial stability and other areas of life such as relationships. This is not an exhaustive list but some of the indicators that gambling may be a problem are:

- You are spending more money than you can afford on gambling, taking out loans to gamble or struggling to pay bills and make ends meet
- You are in debt due to gambling and continue to gamble in the hope to repay your debt
- Feeling that gambling is the only thing you enjoy, and no longer have interest in other hobbies or social activities
- Using gambling to deal with other problems or emotions in your life, having difficulty sleeping, feeling depressed, anxious or suicidal
- Gambling is having an effect on your relationships, you are spending less time with people and isolating yourself, lying about your gambling or arguing more with loved ones
- Feeling lost and in despair and need to gamble again to make yourself feel better

If you have any concerns about the impact gambling is having on you, or a loved one, you should contact [BeGambleAware.org](https://www.begambleaware.org) or call their national helpline for free on 0808 8020 133.

WaterAid is a member of the Lotteries Council which supports and represents the interests of organisations who run lotteries. The Lotteries Council makes an annual donation to BeGambleAware which funds education, prevention and treatment services and commissions research to broaden public understanding of gambling-related harms.

### Protecting Vulnerable People

In line with WaterAid's Vulnerable Supporter Policy, WaterAid's ELMs will politely refuse to accept any further participation in WaterAid's gaming products from a person if they are suspected to be vulnerable or in a vulnerable circumstance.

## Self-Exclusion

If an existing or potential player feels that gambling is a problem or potential problem for them, both WaterAid and our ELM's have self-exclusion policies in place which we encourage supporters to complete if appropriate.

Self-exclusion is a formal request to be prevented from participating in the WaterAid raffle or lottery. The self-exclusion is irreversible for a minimum period of 6 months, after this time a supporter must contact WaterAid or the relevant ELM to remove it.

To self-exclude from the WaterAid Raffle a request can be made to WaterAid via the online form, calling our Supporter Care on 0207 793 4594 or emailing [supportercare@wateraid.org](mailto:supportercare@wateraid.org).

To self-exclude from the People's Postcode lottery please contact PPL directly on 0808 109 8765 or email [info@postcodelottery.co.uk](mailto:info@postcodelottery.co.uk).

Please be aware it can take up to two working days for a self-exclusion request to be actioned.

## Staff Training

All staff who work in fundraising teams at WaterAid receive annual training on how to support people in vulnerable situations, including problem gambling.

Supporter Care staff at WaterAid receive training on how to identify if someone is a problem gambler or in a potentially vulnerable circumstance prior to the start of every raffle campaign.

All staff at CFP are trained on their Social Responsibility Policy and Vulnerable Persons Policy annually.

All staff at PPL are regularly trained on at least an annual basis and made fully aware of WaterAid's social responsibility policies and best practice approaches to identifying and tackling problem gambling. The PPL Customer Service team receives additional training in respect of identifying vulnerable or 'at risk' players, which has been enhanced by engaging with relevant charities.

## Appendix A

To ensure WaterAid adheres to the Gambling Commission's objectives, the following policies and procedures have been put into place.

<b>Gambling Commission Objective</b>	<b>People's Postcode Lottery</b>	<b>WaterAid Raffle</b>
<b>Preventing gambling from being a source of crime and disorder</b>	<ul style="list-style-type: none"> <li>• PPL limits the number of subscriptions a player can have to six, which is a maximum cost of £60 a month. A player can only buy 3 subscriptions in a single transaction.</li> <li>• PPL will only pay prizes into the same bank account as the payment was made, or a bank account verified by PPL.</li> <li>• All draws are adjudicated by an independent legal representative and completed on a secure, standalone and certified draw engine.</li> <li>• No cash subscriptions are accepted.</li> </ul>	<ul style="list-style-type: none"> <li>• Players must be resident in Great Britain and have a UK postcode.</li> <li>• A restriction of 60 tickets per customer will be in place unless customer interaction occurs, for example, by calling WaterAid and discussing the purchase with them on the phone. Without customer interaction tickets will not be entered in to the draw. Interactions will be recorded and where the tickets are purchased beyond the limit a record of this will be kept. This is also to protect people who may be in vulnerable situations, including problem gamblers.</li> </ul>
<b>Ensuring that gambling is conducted in a fair and open way</b>	<ul style="list-style-type: none"> <li>• Players funds are protected from insolvency with lottery proceeds being held in a separate bank account.</li> <li>• Players are provided access to clear information about the rules of the lottery and the prizes that are on offer and are informed of any material changes.</li> </ul>	<ul style="list-style-type: none"> <li>• All funds from ticket purchases are protected from insolvency by being held in a separate account from Mosaic's main account.</li> <li>• Draws are conducted by CFP using a random number generator (which has been approved by the Gambling Commission), or blind draw,</li> </ul>

	<ul style="list-style-type: none"> <li>• Players are provided with information about WaterAid and the other promoting charities, including where to find out more information on them and details of future draws.</li> <li>• A complaints procedure is in place, with the option to refer to an Alternative Dispute Resolution (ADP).</li> </ul>	<p>on Mosaic’s premises and attended by WaterAid staff.</p> <ul style="list-style-type: none"> <li>• CFP publish draw results on their website (RafflePlayer) and in letters to players if they request them. Rules are also available on the CFP website. Rules and results are always available on request.</li> <li>• A complaints procedure is in place, however, in the event that a complaint cannot be resolved by Mosaic, CFP or WaterAid, CFP will provide free third-party arbitration via IBAS.</li> </ul>
<p><b>Ensuring that children and other vulnerable persons will be protected from being harmed or exploited by gambling</b></p>	<ul style="list-style-type: none"> <li>• To play the People’s Postcode Lottery, players must state their date of birth to confirm they are over the age of 16, have a UK bank account, be resident in the UK and provide a UK postcode.</li> <li>• Age verification procedures and ensuring marketing is not sent to anyone under the age of 16, as well as adherence to industry advertising rules to ensure gambling is not attempting to attract young people.</li> <li>• PPL carries out monthly random sampling to verify players ages.</li> <li>• PPL has a Vulnerable Persons Policy regarding identifying, interacting and</li> </ul>	<ul style="list-style-type: none"> <li>• Raffle tickets can only be purchased once the player has self-certified that they are over 18 years of age.</li> <li>• Players must verify they are aged over 18 and Mosaic carries out random age verification checks. Mosaic age verify a minimum of 2.5% of responses per month.</li> <li>• Any player who provides dishonest information regarding their age automatically forfeits the right to any prize. This fact is also stated on the reverse of all tickets and on all entry forms.</li> <li>• Any player that is found to be under 18 years of age will have any monies paid in relation to the lottery returned to them.</li> <li>• If in doubt, Age Verification software will be used to ascertain the age of the entrant. If the</li> </ul>

	dealing with people who are in a potentially vulnerable situation.	<p>age of player is not able to be verified, the payment will be returned.</p> <ul style="list-style-type: none"><li>• Any portals for remote customers will carry a warning before chances are purchased stating that underage gambling is an offence. Customers will then be required to confirm they are over the age of 18.</li><li>• CFP and Mosiac have a Responsible Gambling / Problem Gambling Procedure and Self-Exclusion policy to protect people who may be in a vulnerable situation or be a problem gambler.</li></ul>
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