

The FSI Lottery Policy



FSI Value Statement

The FSI will strive to ensure that Children, young people and other vulnerable groups who come into contact with The FSI or any of its agents are treated in an appropriate and respectful way and that their welfare and safety is paramount, through the implementation and monitoring of appropriate policies and guidance. The FSI will ensure that any lotteries promoted by The FSI are promoted in an open and transparent manner and that all reasonable actions are taken to ensure that its staff, agents and participating charities are not associated with crime or disorder.

1. Protection Against Crime and Disorder (Question 19 of Section 5)

The paper entries sold by FSI and its agents will be paid for by cheque and cash only and our sellers are instructed to be aware of any attempt to pass forged banknotes and coins. Cheques are supported by a debit card number and the card is inspected. (When appropriate cheques and cash paid into the FSI banking system will have a unique numbered paying in slip which trace deposits back to individual sellers/charities)

The FSI will ensure that a clear audit trail is maintained in respect of tickets sold and unsold and that appropriate records are kept for the mandated period of time under the operating licence (see flowchart).

Money Laundering

The FSI raises charitable funds on behalf of small charities and for its own activities and has appropriate and risk sensitive policies and procedures to ensure we comply with money laundering legislation as in our charitable activities we process financial transactions totalling a large amount of money each year. Risk sensitive systems are in place to identify occasional transactions which require further investigation. Extract Money Laundering Policy

Anti-Money Laundering Procedure - Background:

The Law: Trustees should be aware that section 19 of the Terrorism Act 2000 provides that a person who receives information in the course of a trade, profession, business or employment that leads him/her to believe or suspect that another person has committed an offence under sections 15 to 18 (which relate to money or other property being used for the purposes of terrorism) is guilty of an offence if s/he does not disclose this to a constable as soon as is reasonably practicable.

- If offered large donations from persons unknown FSI staff must make further enquiries before accepting the donation, and may refuse a donation if satisfactory replies to enquiries are not received.
- Donations conditional upon particular individuals or organisations being used to do work for the FSI may be refused.
- Offers of donations in cash, for a certain period of time, the FSI to receive the interest, but the principal to be returned to the donor at the end of the specified period, may be refused
- Donations in foreign currencies, with the provision as above, but the principal to be returned to the donor in the form of a sterling cheque, will be refused

The above guidance is required to ensure that the FSI does not inadvertently assist a terrorist organisation by allowing the charity to be used for money laundering purposes. This is one of the more difficult areas for FSI Trustees to deal with, as the type of activity listed in the first three bullet points above may be perfectly legitimate and lawful. FSI staff and Trustees are reminded that unsolicited donations could be suspicious, especially if they are unable to satisfy themselves about the credentials of the people involved, or the propriety of the donation or loan.

Procedure:

- If the FSI receives any money over £9,000 Form Banking F9 must be completed and check with the Designated Money Laundering Officer (CEO Pauline Broomhead) that it is okay to accept
- If the FSI receives any money which a member of staff thinks is of suspicious origin they should fill in the attached form and notify the Designated Money Laundering Officer (as above)
- All staff or volunteers who receive money must be trained in what they must do to comply with this Money Laundering Policy as part of their induction
- If you receive money which has gone through a pre approved identification process as described in this policy you do not need to fill out the form and notify the Designated Money Laundering Officer

FSI Staff (Extract from Child Protection Policy)

The Rehabilitation of Offenders Act (1974) requires that people applying for positions which give them 'substantial, unsupervised access on a sustained or regular basis' to children must declare all previous convictions. In all cases where this requirement applies, and where there is any doubt as to the application of the requirement to a specific post i.e. the interpretation of 'significant', The FSI will ensure that an Enhanced Criminal Record Certificate is obtained from the Criminal Records Bureau prior to the member of staff commencing duties involving access to children.

Codes of Practice

The FSI abides by the Charity Commission Guidelines and the Codes of Practice set down by the Institute of Fundraising.

2. Promotion of Fairness and Transparency (Question 20 of Section 5)

The FSI will be promoting annual lotteries. FSI will be handling the tickets and we will do this only in association with charities who are registered with the charity commission or who are able to satisfy the FSI that they are not for profits/charities raising less than £5,000 per annum and therefore not able to register with the Charity Commission. As part of our guidance to charities taking part we stipulate that the people selling the tickets are volunteers or the staff of these organisations.

The FSI also recognises that all lotteries should be conducted in an open and transparent manner. The FSI staff and anyone selling tickets on its behalf will therefore: be informed of the provisions of this policy during their induction period.

A copy of the rules of our lotteries will be published and will be available on request.

Complaints

Any complaints from customers would be dealt with by the named Operator in the following manner and timeframe:

- Complaint Received – details taken and date of complaint logged
- Complainant will receive notification that the complaint is being investigated within 5 working days of the complaint being received
- The FSI will undertake an investigation of the complaint
- The findings will be made known to the complainant within 4 weeks of the complaint being logged
- The complainant is able to appeal/challenge the findings within 5 working days of receiving the outcome of the investigation
- In instances where the findings are challenged the FSI will undertake a further investigation and take legal guidance on next steps. In this instance the complainant will be notified within 2 working weeks from the receipt of the appeal of what action is being taken
- The FSI will make a final submission to the complainant within 3 months of the appeal/challenge being logged.

If it comes to the attention of the FSI that any of the charities selling the tickets are operating in an illegal manner this will be immediately reported to the Charity Commission and the Gambling Commission and the FSI will withdraw the opportunity to sell tickets from the said charity.

It is the responsibility of the charity to ensure that the FSI receives all ticket stubs, sold and unsold back in time for the draw. The FSI will alert charities of this responsibility 2-3 and 1 week prior to the closing of the lottery. The FSI guidelines for sale of tickets clearly stipulates that only numbers on ticket stubs received back to the FSI by the specified date will be entered into the draw. All reasonable attempts will be made by the FSI to ensure that all unsold tickets are received back into the FSI prior to the draw date (see flowchart).

Tickets

All lottery tickets will provide full information about the ticket cost, the prize(s), when the draw will take place, and how the winner(s) will be notified giving full details of the promoter name and society address, the fact that players must be 16 or over, information on how to obtain the rules of the lottery, the full licensing wording in relation to the Gambling Commission, along with the Commission's website address and that the FSI promotes responsible gambling together with the reference to www.gambleaware.co.uk

The tickets and on the website, will also clearly state that the beneficiaries of the lottery will be small charities

3. Vulnerable persons and Children (Question 21 of Section 5)

No volunteer or member of staff under the age of 16 will be able to *sell* lottery tickets.

The FSI will ensure that its staff, agencies and associated charities are aware that children under the age of 16 and other vulnerable persons should under no circumstances be sold lottery tickets. That should any member of staff, agency or associated charity be unsure of the age of the person being sold a lottery ticket they should ask for 'proof of identity and age' before selling the lottery ticket.

On the issue of under-age gambling it might be rare for an agent or volunteer to be approached by a person whose behaviour or appearance indicates that the person may not be of sufficient age to purchase a lottery ticket. We would stress again, however, that if there is any doubt whatsoever about the age of people trying to play it will be confirmed with them that the individual who proposes to make the purchase is 16 or over. If necessary a form of identification will be requested, including any identification. This could be a passport, driving

license, Connections card, school ID card, Student travel card, or any other means of age verification identification which includes the holder's photograph and which has been issued by an organisation or statutory. If anyone selling lottery tickets on our behalf is still concerned that the customer is not 16 years of age and the persons age cannot be verified, we will advise them that it is far safer to decline the purchase.

FSI will request agents to inform them of any repeated attempts to gamble made by a person who is under-age.

4. Social Responsibility in Gambling (Question 22 of Section 5)

The FSI will ensure that all those involved in selling tickets have a sheet of guidelines which addresses problem gambling, self-exclusion, and organisations which offer help to those who may have a gambling problem. This sheet will cover the following points:

The FSI wishes to remind its agents and volunteers that they need to be aware of vulnerable gamblers and those who might be experiencing problems.

While the issue of problem gambling mainly concerns customers who might play online or may gamble hour after hour in cash betting offices it is also possible that non-remote lottery players might become over-enthusiastic and play more than they can afford. Customers will not be encouraged to play beyond their own budget.

Care will also be taken not to exploit the young, the immature or those who are otherwise socially vulnerable. In this respect our Terms and Conditions will state that a player can self-exclude for a period from 6 months up to at least 5 years as per the guidance in Licence Conditions and Conditions of Practice.

Should an agent believe that a customer has a gambling problem then we will ensure that they are aware that there are several agencies available which are able to offer professional advice and counselling. These are organisations such as Gamcare www.gamcare.com (0845 6000133) and the Responsibility in Gambling Trust (www.rigt.org.uk) and it's website, www.gambleaware.co.uk

As mentioned above, FSI will ensure that all its lottery tickets bear a reference to the support, advice and counselling available from Gamcare and www.gambleaware.co.uk

The FSI intends to make a contribution to RIGT and support its work whenever it has the opportunity.

5. Commitment to review

This policy will be reviewed at regular intervals to ensure it reflects emerging good practice and legislative requirements.

*** Note: The FSI does not have the provision to check up on individuals when the tickets are sold by small charities but we would require the small charities to have full supporting records of their sales.