

## **Social Responsibility and Gambling Policy**

Greenpeace Environmental Trust (Greenpeace) operates a society lottery promoted and managed by People's Postcode Lottery (PPL) and licensed and regulated by the Gambling Commission to help raise funds to support our work.

Greenpeace is committed to ensuring that each lottery is operated in a secure, fair and socially responsible way and to endorsing responsible gambling.

This document sets out Greenpeace and PPL's 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 PPL:

- a. Players must confirm their date of birth, showing they are 16 or over and have a UK bank account, and
- b. 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, PPL:**

- a. Limits the number of subscriptions sold in one transaction to three, and the total amount of subscriptions which a player is allowed to have is limited to six;
- b. Prizes are ordinarily paid to the bank account from which payment is taken. Where bank details have not previously been provided e.g. where subscription is paid by Paypal or Credit Card, all winnings over £3,000 will only be paid to a verified bank account.
- c. For all winnings over £15,000 the same verification checks will be carried out, regardless of payment type
- d. Ensures draws are adjudicated by an independent legal representative and completed on a secure, standalone and certified draw engine;
- e. Offers no cash subscriptions; and has an Anti-Fraud, Corruption and Bribery Policy.

f. Customer and player data is monitored and collated to ensure no breaches and statistics are taken to SMT meetings and Operations meetings on a monthly basis as well as a quarterly PML Holder meetings.

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

PPL 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, as well as the Industry Group for Responsible Gambling
- 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 material changes to players in both electronic and paper format prior to those changes coming into effect, which are submitted to the Gambling Commission 28 days in advance
- d. On sign up, details of promoting societies is given, together with where details of future draws and relevant promoting societies can be found
- e. Tickets clearly indicate the price of the tickets and that PPL is licensed by the Gambling Commission
- f. A complaints process that is in place to deal with any issues in a clear and procedural way, including an option of referral to Alternative Dispute Resolution.

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

The Gambling Act 2005 s45 (1) states "*A person commits an offence if he invites, causes or permits a child or young person to gamble*".

Before an individual can join the lottery they must confirm that they are over 16 years, and provide their date of birth. In addition to the individual confirming they are 16 or over, PPL's internal controls prevent an account being created if the date of birth provided would mean the individual is under 16.

PPL adheres to advertising rules laid out by the Committee of Advertising Practice and Broadcasting Committee of Advertising Practice, and the guidance given by the Industry Group for Responsible Gambling, to prevent the exploitation of children or other vulnerable persons and

does not link gambling to youth culture or attempt to attract young persons to gamble. PPL has contracted with external companies to undertake age checks aimed at ensuring personalised marketing is not sent to anyone under 16. All advertising carries a 16+ logo and our Terms and Conditions provides only people of 16 or over may participate, and that prizes will not be paid to anyone found to be under 16 years old.

All who sign up with PPL self-verify their age and PPL also completes random checks of individuals who sign up to verify their age by conducting monthly dip-sampling of at least 1,000 records. If PPL becomes aware of a subscription created by an individual who is under the age of 16 years, the account will be stopped and blocked immediately. If PPL has a suspicion an individual is under 16 we will request a valid, photographic ID to verify the individual's age. If unable to verify the individual's age the subscription will be stopped and blocked.

PPL has a Vulnerable Persons Policy regarding identifying, interacting and dealing with potentially vulnerable people.

## **5. Underage Gambling**

It 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, on request, that they are 16 or over then any winnings will be forfeited. PPL make it clear in all promotional materials that only those aged 16 or over are eligible to play the lottery. Should anyone under the age of 16 be found to be playing, their account will be closed immediately, and all stakes returned.

## **6. Gambling Limits**

PPL imposes limits on the number of tickets purchased by an individual in a single transaction to three and the total number of playing subscriptions to six. Player data is checked daily to ensure that no one is holding more than 6 tickets. Where it is found that a player has attempted to sign up with more, the excess tickets will be cancelled, and the player contacted, so that only the maximum of 6 tickets are entered into the draw.

**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 their commitment to promoting socially responsible gambling, the following guidance is provided on PPL's website for the benefit of individuals who participate in lotteries operated by PPL:

- 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.begambleaware.co.uk](http://www.begambleaware.co.uk) or 0808 8020 133, alternatively a full list of organisations which provide help and advice is available through the Gambling Commission website.
- If you want to have a break from gambling, you can use PPL's self-exclusion option

## **8. Self-Exclusion**

PPL must close any customer accounts of an individual who has entered a self-exclusion agreement. The minimum initial self-exclusion period offered for non-remote gambling is of a duration of between 6 and 12 months. In terms of remote gambling the minimum self-exclusion period is from 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 personalised marketing material will be sent to the individual unless the individual has taken positive action in order to gamble again, and has specifically 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.**

PPL 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 GambleAware 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, PPL and Greenpeace confirm that:

- Our commitment to being a socially responsible operator is covered in our staff training process.
- All responsible staff are regularly trained on at least an annual basis and made fully aware of our social responsibility policies and best practice approaches to identifying and tackling problem gambling; and,
- PPL's Customer Service team receives additional training in respect of identifying vulnerable or 'at risk' players, which has been enhanced by engaging with PPL's relevant charities.

**12. Review**

This policy will be reviewed on at least an annual basis.

Date: November 2020