

# The Luton and Dunstable Hospital Charitable Fund Lottery Policy

Our lottery complies with the following policies:

The Luton and Dunstable Hospital Charitable Fund (L&D) outsource the administration of its lottery to Unity. Unity is administered by Sterling Management Centre, a registered External Lottery Manager (ELM) licensed by the Gambling Commission. Unity operate a platform which complies with all relevant codes and remote technical standards.

Please note where the Luton & Dunstable Hospital Charitable Fund website is referred to this covers the charity's own lottery web page at <https://www.ldh.nhs.uk/charity> and the designated page at [unitylottery.co.uk](http://unitylottery.co.uk).

The Luton & Dunstable Hospital Charitable Fund Lottery is licensed by Luton Borough Council; registration number 163942.

## Law and Disorder Policy

### Unity requirements

1. Unity keeps a record of all entries into a lottery draw.
2. Unity is able to provide information for any police checks of a lottery ticket buyer that may be carried out. They are able to provide address details and details of any monies sent in for entries bought.
3. Unity operates from secure premises as required by the 2005 Gambling Act.
4. Unity processes all entries and handles all monies received for lottery draws. All monies are paid directly in to a Unity held bank account with a Trust Status and Unity audits the bank accounts weekly. Unity send a cheque to the Luton and Dunstable Hospital Charitable Fund monthly, along with remittance advice for Gambling Commission returns.
5. Unity will ensure that it reports any actual or suspected criminal activities to the police.
6. Unity will not enrol any person into any of its lottery schemes if that person is suspected of any potential or actual criminal activities
7. Unity will report any actual or suspected criminal activity in line with the Proceeds of Crime Act 2002. Staff are trained on the implications of the Proceeds of Crime Act and their obligation to report.

### L&D Requirements

8. The Luton and Dunstable Hospital Charitable Fund will refuse to be associated with any proposed lottery scheme or other gambling activity that may breach the law.

9. The Luton and Dunstable Hospital Charitable Fund will refuse to contract with any contractors or agents who the Luton and Dunstable Hospital Charitable Fund suspects may be associated with any potential or actual criminal activities.
10. The Luton and Dunstable Hospital Charitable Fund will only use suppliers who are licensed by the Gambling Commission (External Lottery Managers), to run all or part of the Luton and Dunstable Hospital Charitable Fund own lottery/ raffle business.
11. The Luton and Dunstable Hospital Charitable Fund will require suppliers and contractors to ensure that all staff and contractors who are likely to be engaged with the Luton and Dunstable Hospital Charitable Fund to obtain relevant references.
12. The Luton and Dunstable Hospital Charitable Fund will monitor their staff and self-employed agents on an ongoing basis, particularly regarding their direct or indirect association with potential criminal activities.
13. The Luton and Dunstable Hospital Charitable Fund will expect that any suppliers or consultants who are associated with their lottery/ raffle will report any potential and actual criminal activities to the Luton and Dunstable Hospital Charitable Fund as soon as possible
14. The Luton and Dunstable Hospital Charitable Fund will expect that any suppliers or consultants who are associated with their lottery/ raffle will cooperate fully with the police and Gambling Commission should any actual or suspected criminal activities arise.
15. The Luton and Dunstable Hospital Charitable Fund, staff involved in promoting lotteries or selling lottery tickets face to face or via telephone will be trained to a satisfactory standard.

As a part of our Law and Disorder Policy the below policies are specifically targeted at money laundering and proceeds of crime

16. Customer interaction will occur at a request to enter 20 or more entries per week. Interactions will be recorded by Unity and where the tickets are purchased beyond the limit, records will be kept for 3 years.
17. Other than in the circumstances set out in the self-exclusion and protection of children and the vulnerable policies, refunds are only available at the discretion of The Luton and Dunstable Hospital Charitable Fund.
18. Unity monitor remote and non-remote entries received.

Fair and open draws policy

19. Unity will ensure all lotteries are fair and open.
20. Full terms and conditions of lottery draws (detailing how the draws are kept fair and open) can be found [here](#). When a change is made to the Terms, it is also noted on the Unity website.
21. Winning numbers associated with the lottery will be published at [www.unitylottery.co.uk](http://www.unitylottery.co.uk) and on Unity social media.

22. The Luton and Dunstable Hospital Charitable Fund have a complaints procedure in place (please see below).
23. A record is kept of all online ticket sales.

### Responsible gambling/problem gambling procedure

24. Unity has put in place the following procedures to encourage people to gamble responsibly and seek help should gambling become a problem:
  - a. Gambleaware.co.uk website address is included on all entry forms to lotteries as well as our website address that includes information on gambling.
  - b. Information is displayed on our website encouraging people to gamble responsibly and to recognise the signs of problem gambling.
  - c. Software is available to prevent individual computers from accessing gambling internet sites. Please see [www.gamblock.com](http://www.gamblock.com) or [www.betfilter.com](http://www.betfilter.com) for further information.
  - d. Where customer behaviour indicates problem gambling they will be contacted by Unity under supervision of senior management and will follow procedures for this contact.
  - e. Unity restrict the number of tickets a customer can order before customer interaction occurs – see law and disorder policy above.
  - f. A customer interaction policy is in place and details the processes for interactions including; self-exclusion, customer complaint, customer payments, customer contact preferences, age verification, requests for additional books and non-lottery enquiries.
  - g. All relevant sources of information will be used to identify customers at risk of problem gambling.
  - h. Relevant staff will be given appropriate guidance for interaction with customers demonstrating signs of agitation, distress intimidation, aggression or other behaviours that may inhibit customer interaction.

### Self-Exclusion Policy

25. Player Information on self-exclusion is published [www.unitylottery.co.uk/terms-conditions/](http://www.unitylottery.co.uk/terms-conditions/)
26. Players can request self-exclusion so that they are removed from further communications including post, telephone, email and SMS.
27. Unity will capture all self-exclusion requests along with the date of the request will be captured.
28. All reasonable steps will be taken to prevent any self-excluded individuals participating in gambling activity.
29. Self-excluded individuals will not be entered into a draw and will have any money received refunded to them, including when funds were paid before the self-exclusion notice was received and the draw has not yet been conducted.

30. Self-exclusion can be requested by contacting customer services team on **0370 050 9240**
31. Self-exclusion can be selected for a minimum period of 6 months through the web form on [www.unitylottery.co.uk/terms-conditions](http://www.unitylottery.co.uk/terms-conditions) During the period of self-exclusion Unity will not permit the individual to enter lotteries.
32. At the end of the period chosen by the customer, the self-exclusion remains in place for another 6 months unless the customer takes positive action in order to gamble again.
33. On request, self-exclusion can be extended for one or more further periods of at least 6 months each.
34. Self-exclusion flags will be added to the Unity database within 2 working days of receipt.
35. Records relating to self-exclusion will be kept permanently on the player record.
36. Staff are trained on self-exclusion and will signpost counselling and support services.
37. Software is available to prevent individual computers from accessing gambling internet sites. See [www.gamblock.com](http://www.gamblock.com) or [www.betfilter.com](http://www.betfilter.com) for further information.

### Protection of children and the vulnerable

38. It is an offence for people aged under-16 to enter lotteries.
39. Our licence conditions state that subject to warnings in our lottery rules and the carrying out of random checks we only need a self-assertion by the player of their age rather than the age having to be verified by ourselves or a third party.
40. A player suspected of being under-16 will be challenged. Unity will log all under age challenges.
41. Any player who is found to be under-16 years of age will have any monies paid in relation to the lottery returned to them.
42. Any player who is found to be under-16 automatically forfeits the right to any prize.

### Player complaints procedure

1. Unity has a complaints procedure in place and will keep this procedure up to date with license requirements and Gambling Commission guidance.
2. Definitions
  - a. A complaint is an expression of general dissatisfaction which can be received informally (verbal) or formally (written) but not one necessarily related to the outcome or process of a lottery.
  - b. A dispute is an unresolved complaint which questions the truth or validity of something which relates to the outcome of the customer's gambling e.g. the customer may dispute how the lottery
3. Unity deal with all complaints.
4. Unity maintains a log of all customer complaints.

## Telephone and online complaints

- a. A copy of complaints procedure can be requested.
- b. If an initial complaint can't be resolved, the complaint is logged by Unity and the Luton and Dunstable Hospital Charitable Fund are notified immediately of the issue.
- c. In the event that a telephone or online complaint cannot be resolved by the External Lottery Manager or representatives of the Luton and Dunstable Hospital Charitable Fund, third party arbitration will be provided via the Independent Betting Adjudication Service (IBAS). Independent Betting Adjudication Service, PO Box 62639, London, EC3P 3AS, 020 7347 5883, adjudication@ibas-uk.co.uk.
- d. All general queries will be logged on the log sheets by the External Lottery Manager and held for future reference.

## Written complaints

- e. Initial complaints and queries will be responded to within two days of receipt of complaint by the administration team of Unity.
- f. Customers may be given a copy of complaints procedure on request.
- g. If the initial complaint can't be resolved by Unity, the complaint is logged and forwarded immediately to the Luton and Dunstable Hospital Charitable Fund.
- h. In the event that a telephone or online complaint cannot be resolved by the External Lottery Manager or representatives of the Luton and Dunstable Hospital Charitable Fund, third party arbitration will be provided via the Independent Betting Adjudication Service (IBAS). Independent Betting Adjudication Service, PO Box 62639, London, EC3P 3AS, 020 7347 5883, adjudication@ibas-uk.co.uk.
- i. All general queries will be logged on the log sheets by the External Lottery Manager and held for future reference.