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## The Air Ambulance Service Commitment To Social Responsibility In Gambling

The Air Ambulance Service (TAAS) operate two weekly subscription lotteries. TAAS also operate a seasonal raffle a few times a year. All these activities are run in conjunction with Gambling Commission lottery licences to raise funds to support the charity's lifesaving services.

TAAS is committed to ensuring each lottery and seasonal raffle is operated in a secure, fair, and socially responsible way endorsing responsible gambling amongst its supporters.

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

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

This document sets out TAAS policies and approach to ensuring we approach any gambling activities in a socially responsible way.

### **Preventing gambling from being a source of crime and disorder, being associated with crime and disorder, or being used to support crime.**

When a supporter joins one of our weekly subscription lotteries, we will conduct the following checks:

- The supporter is aged 18 or over.
- The supporter is resident in the UK.
- TAAS retain the right to terminate any players participation in a lottery that we promote should we suspect criminal activity.
- TAAS does not accept cash.
- TAAS limit the maximum number of entries to £20 per supporter per week.
- All lottery related computers and software is password protected and accessible only by authorised employees.
- TAAS conducts a strict and thorough reporting procedure if an employee and or our third-party operators are found to be in any way operating in an illegal or suspicious manner.

When a supporter buys raffle tickets in our individual giving seasonal raffles, we:

- Make it clear that purchasers must be aged 18 or over by including the 18+ logo and statement that entrants must be aged 18 or over on the postal response form, on printed raffle tickets and stubs and stated in T&Cs (which are included on the back of the tickets and online). Online players must enter their DOB and the validation checks this equates to an age over 18 years.
- We send £5 worth of tickets in "cold" mailings (e.g. door-drop, rental lists, etc) and a max £30 worth of tickets to "warm" supporters. On the response forms it is stated that a maximum of 50 tickets can be purchased in total and the website does not allow more than 50 tickets to be purchased. A maximum of 3 additional books will be sent.

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- All seasonal raffles related computers and software is password protected and accessible only by authorised employees.
  - TAAS adopt a strict and thorough reporting procedure if an employee and or our third-party operators are found to be operating in any way in an illegal manner.

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

TAAS will ensure that:

- Players have access to clear information on matters such as the rules of the lottery, the prizes that are available and the chances of winning.
- The rules are fair.
- Any advertising and promotional material is clear and not misleading.
- The results are made public.
- Tower Lotteries, who manage our weekly subscription lotteries on TAAS's behalf utilise tried and tested lottery software to administer our lotteries with a Random Number Generator (RNG) in line with the Gambling Commission regulations.
- Woods Valldata, who manage our individual giving draws on TAAS's behalf utilise both electronic and physical draws in a process that has been audited for compliance by the Gambling Commission.

### **Protecting children and other vulnerable persons from being harmed or exploited by gambling.**

TAAS will use our best endeavours to address the following issues:

#### **Age Verification Policy**

- It is an offence for persons under the age of 18 to play the lottery or take part in a seasonal raffle.
- Systems will not allow the person to be entered into the lottery or seasonal raffles if they are under 18.
- TAAS employees and operators are trained to be aware of their responsibilities for preventing underage gambling and for returning stakes and not paying prizes to underage customers. Where lottery tickets are sold face to face, if it appears that the potential customer might be under 18, our staff ask for proof of identity, establishing that the person is aged 18 and over before selling the lottery ticket to them. In the case of customers who apply for lottery tickets by post, we carry out random checks to ensure compliance with age restrictions.
- Examples of acceptable identification for age verification purposes include:
  - Passport
  - Driving Licence
  - Official Student Card

### **Protecting vulnerable persons.**

Employees are trained to be aware of vulnerability in potential supporters and politely decline participation if there are concerns regarding the vulnerability of the supporter.

TAAS identifies the following as potential vulnerable persons:

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- Adults maybe vulnerable if, for example they are taking certain types of prescribed medication which may impair their judgement or prevent them making informed, balanced decisions about gambling; or if they are intoxicated from misusing drugs or alcohol.
  - Adults who have mental health issues, a mental impairment or problems with addiction may also be vulnerable as they may have difficulty controlling their activities or behaviour or understanding the players' guides to games.
  - Adults in vulnerable circumstances, for example domestic abuse or criminal exploitation, in which they are being coerced or exploited into gambling activities.

TAAS has identified what the risks to vulnerable adults if they are not supported within the gambling environment. They may be at risk of:

- Gambling beyond their financial means.
- Problems with addiction.
- Financial exploitation.
- Causing, or being victim of dangerous, abusive or threatening behaviour.
- Physical, emotional or accidental harm.

These difficulties may have a serious impact upon the person's relationships, home life or employment. TAAS Society will manage the risk and be socially responsible by protecting identified vulnerable supporters by managing gambling limits and self-exclusion appropriately.

### **Gambling Limits**

- TAAS Society may impose limits on the value of entries into a lottery that can be purchased by a supporter to £20 per week.
- TAAS society have imposed a limit of max 50 raffle ticket limit per supporter for inclusion in our seasonal raffles.
- If employees identify concerns that a supporter's behaviour significantly changes in their gambling activity (for example by a sharp increase in their expenditure on lottery tickets or chances) may indicate a problem with gambling. Employee's will be trained to report the matter to the TAAS Licence signatories who are the responsible individuals, they will telephone the supporter to discuss the concerns that have been highlighted, signposting the supporter to the main gambling support agencies for guidance and support. In severe cases, consideration may be given to barring the supporter from participating in the lottery or seasonal raffle.

### **Self-Exclusion**

- TAAS has procedures in place allowing a supporter to self-exclude in-line with Gambling Commission guidelines and will take all reasonable steps to refuse service or to otherwise prevent a supporter who has entered a self-exclusion agreement from participating in gambling. A supporter who has made contact to request self-exclusion will be refused service and prevented from gambling with TAAS. A request for self-exclusion will be available with immediate effect with no "cooling off" period.

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- During the self-exclusion period, TAAS will take all reasonable steps to ensure that the individual does not try to play any gambling opportunities promoted by TAAS and prevent any marketing material being sent to them. We will remove name and details of the self-excluded supporter from all marketing databases and flag them as a supporter to whom marketing material must not be distributed to within two days of having received the completed self-exclusion notification from the supporter.
  - The self-exclusion request will be entered onto the lottery software system and TAAS database for seasonal raffles and will block any further requests to partake in gambling by using the following fields of data; surname, first names, address, postcode, telephone number and email.
  - A supporter requesting self-exclusion will be informed as to what self-exclusion is and will be provided information for the main gambling support agencies below:
    - [GamCare.org.uk](http://GamCare.org.uk)
    - [BeGambleAware](http://BeGambleAware)
    - National Gambling Helpline **0808 8020 133** which is operated by GamCare, offers confidential advice, support, and information on problem gambling. You can speak with an advisor for free 24 hours a day, 365 days a year over the phone or Live Chat.

Requests for self-exclusion from TAAS subscription lottery can be accepted in writing to:

TAAS  
C/O TLP Ltd  
Unit C2  
Waterfold Business Park  
Bury  
Lancashire  
BL9 7BR

Or telephone 0844 567 0844

- The supporter's lottery account will be closed, any outstanding balances on the supporter's account will be refunded. For supporters who have paid by cheque, TAAS will calculate the balance from the last draw they participated in, to the end date of their subscription, and will refund the supporter by cheque within 10 working days. Supporters who pay by standing order are to be advised to contact their bank directly to cancel their standing order, TAAS will refund the supporter by cheque each month until the standing order is cancelled.

Requests for self-exclusion from our seasonal raffles can be accepted in writing by completing the Self-Exclusion Form and sending it to:

Supporter Experience Team  
Blue Skies House  
Butlers Leap  
Rugby  
CV21 3RQ



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Or on email to [enquiries@theairambulanceservice.org.uk](mailto:enquiries@theairambulanceservice.org.uk) or the form can be completed over the telephone by calling 0300 3045 999.

- The supporter's self-exclusion request will be added to TAAS database and flagged for non-inclusion in all seasonal raffles and removed from all marketing data lists immediately.
- Throughout the self-exclusion period, the supporter will not be entered into any TAAS seasonal raffle draws, or allowed entry into the subscription lottery even if the supporter has failed to cancel their Standing Order with Tower.
- Once the supporter's self-exclusion period ends, and the supporter wishes to recommence participating in one of the lotteries promoted by TAAS, the supporter must request in writing that they wish to be removed from the self-exclusion register. Once we receive this letter the individual will be given one day to cool off before being given the opportunity to recommence participation in the lottery.
- The supporter must be the one to take positive action to gamble again and no contact will be made by TAAS for at least seven years until contact has been made by that individual after the self-exclusion period has ended.

### **Death by Suicide**

Should TAAS be made aware that the death of any supporter actively playing our weekly lotteries or seasonal raffles may be due to suicide, then we are required to inform the Gambling Commission of this. We are required to do this as soon as is reasonably practicable, and this information should be conveyed irrespective of whether or not the suicide is known or suspected to be associated with gambling.

The notification must include the person's name and date of birth, and a summary of their gambling activity, if that information is available to TAAS.

### **Protection of customer funds**

- Supporter's funds intended for the use in future gambling or lottery subscriptions will be held in a separate bank account or accounts relating to the relevant affiliated charity lottery and will be separate from any TAAS trading income.
- TAAS are required by our licence to inform customers about what happens to funds which we hold on account for you, and the extent to which funds are protected in the event of insolvency. [www.gamblingcommission.gov.uk/consumers/protection-of-customer-funds.aspx](http://www.gamblingcommission.gov.uk/consumers/protection-of-customer-funds.aspx)

We hold supporter funds separate from TAAS funds. This means that steps have been taken to protect our supporter's funds, but there is no absolute guarantee that all funds will be repaid.

This meets the Gambling Commission's requirements for the segregation of customer funds at the level: medium protection.

- The licensee operates a strict no 'cash policy' for our weekly subscription lotteries to prevent the risk of crimes such as money laundering, to avoid the giving of illicit credit and to provide assurances that gambling activities are being conducted fairly. Please contact TAAS, Blue Skies House, Butlers Leap, Rugby, Warwickshire CV21 3RQ for a copy of TAAS Cash handling and money laundering procedures.



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## Social responsibility in gambling – Ensuring Marketing Compliance

All advertising and marketing material must comply with the Gambling Act 2005, and all other subsequent statutory orders and amendments.

This procedure applies to all printed marketing material, and all 'virtual' electronic media content, including internet websites, social media content and mobile telephone application content.

All marketing material, irrespective of the nature of the media, must contain the following:

- The name of the promoting society (TAAS)
- The price of the ticket for the relevant lottery
- The name and address of the member of the TAAS responsible for the promotion of the lottery.
- The date of the relevant draw.
- The fact that TAAS is "Licensed by the Gambling Commission."
- The Gambling Commission website [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

In the case of electronic media, it must be possible for the purchaser of the ticket to retain or print a document that contains all of the above.

All advertisements must also comply with BCAP and CAP advertising guidelines, and these guidelines should be consulted before proceeding with any advertising material.

No young person who is, or appears to be, under 25 years of age should be used in any advertising material, unless that material exclusively features the good cause benefits and does not include any explicit encouragement to buy a lottery product.

No digital advertisements must appear on websites that provided unauthorised access to digital content, and any lottery-related adverts must not be placed with or by third-parties where editorial control of content cannot be guaranteed.

### **PROMOTION OF THE LOTTERY BY WEBSITE/SOCIAL MEDIA**

As it is an offence to sell tickets to under 18's, TAAS must ensure that sale of remote chances does not inadvertently target or recruit lottery players using this media.

**PRIZES THAT SPECIFICALLY TARGET YOUNGER PEOPLE UNDER 25 YEARS OF AGE SUCH AS VIDEO GAMES, THEME PARK TICKETS OR CERTAIN MUSIC CONCERTS MUST NOT BE OFFERED AS INCENTIVES OR PRIZES.**

In addition, it is vital that the customer must have access to relevant information, on each individual webpage, e-mail, or other electronic communication.

In the case of a social media 'post' or 'tweet', where space may be limited, the first landing page linked to the post/tweet must contain all six mandatory pieces of information.

It is also further advisable in the interests of transparency that this information appears on all subsequent lottery related web pages.



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Any pages involving direct sign-up, or requests for further information, MUST contain full lottery and promoting TAAS Society details.

## Complaints

Complaints can be raised via [Contact The Air Ambulance & The Children's Air Ambulance Service \(theairambulance.org.uk\)](https://theairambulance.org.uk) we endeavour to resolve all complaints to a satisfactory resolution for our supporters. When supporters are not satisfied by our findings and corrective actions, TAAS is registered with Independent Betting Adjudication Service (IBAS) [How to raise a dispute | IBAS \(ibas-uk.com\)](https://ibas-uk.com) who are approved by The Gambling Commission, dedicated to resolving disputes between licensed gambling operators and our supporters.