

MACMILLAN CANCER SUPPORT

Policy

Gaming and Responsible Gambling Policy

Key Facts

- This policy applies to Macmillan license holders, External Lottery Managers, staff, volunteers, fundraisers and third- party suppliers who carry out activities in relation to the Macmillan Lotteries.
- Refer to this policy before underrating any licensed gaming activity.
- The Gambling Act 2005 outlines three key licensing objectives which Macmillan Lotteries must comply with:
 - Ensuring that gambling is conducted in a fair and open way.
 - Protecting Children and other vulnerable persons from being harmed and exploited by gambling.
 - preventing gambling from being a source of crime and disorder, being associated with crime or being used to support crime.
- The Act also places a responsibility on Macmillan to promote socially responsible gambling.

Policy Title	Gaming and Responsible Gambling Policy.	Document Classification	Public
Policy Sponsor	Executive Director Fundraising Marketing and Innovation.	Policy Reference	POL- 068
Policy Lead	Fundraising and Marketing Compliance Manager	Version Number	V 2.0
Policy Date	[date published]	Policy Revision Due	01.10.23

Purpose of Policy

Macmillan Cancer Support (Macmillan) fundraises in a number of ways to provide the necessary funds for the important services they provide. One important aspect of this fundraising activity is the “Macmillan Lottery”.

Lotteries must be conducted in line with the Gambling Act 2005 and, as lottery licence holders, we are regulated by The Gambling Commission. Macmillan holds both remote and non-remote lottery licences for each of its four subsidiary companies. In respect of each of these, we must comply with the Licence Conditions and Codes of Practice (LCCP) issued by the Gambling Commission.

Macmillan employs two External Lottery Managers (ELM’s) to fulfil various aspects of the lottery programme. These are WoodsValldata Ltd and Starvale Technologies Ltd. Each ELM holds their own licenses and are also regulated by the Gambling Commission and therefore must also adhere to the LCCP.

Macmillan Cancer Support operates under an Annex A licensing structure and as such holds the appropriate licences to be able to operate and comply with the Gambling Act.

Who is covered by this policy?

This policy applies to Macmillan Licence holders, ELMS, staff, volunteers, fundraisers, and third-party suppliers who carry out activities in relation to the Macmillan Lotteries. Such activities include marketing, handling complaints, the administration of the lottery and awarding of prizes.

Board and Governance

To ensure there is an appropriate governance structure in place, Macmillan has a Gaming Board. The Gaming Board members hold positions of sufficient responsibility to make decisions regarding the gaming programme. The Gaming Board must act in accordance with this policy and is responsible for ensuring all gaming products are promoted and conducted in line with current legislation.

Any changes and decisions regarding gaming products must be presented to the board for final decisions. All actions, decisions, risks, and incidents are reviewed by the board, documented and logged accordingly.

Policy

Lottery Structure

Macmillan wholly owns four subsidiary trading companies each of which promotes a lottery to raise funds to support different areas of Macmillan’s work. They are referred to collectively as “The Macmillan Lottery.” The four subsidiary companies (also known as promoters) are each licensed by the Gambling Commission.

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Macmillan Financial Grants Lottery Ltd

Registered Company (no. 9494065), Gambling Commission Licence no. 44252

Provides funding for Macmillan financial grants to support people affected by cancer in the UK.

Macmillan Cancer Information Lottery Ltd

Registered Company (no 9771409), Gambling Commission Licence no. 44254

Provides funding for Macmillan information services including cancer information centres, the Macmillan Support Line and cancer information developed for people affected by cancer in the UK.

Macmillan Influencing Cancer Care Lottery Ltd.

Registered Company (no. 9771351), Gambling Commission Licence no. 44255

Provides funding and support for work to redesign and improve cancer care practices across the UK including research and campaigning to improve cancer services, influencing cancer policy and raising awareness (of the needs of people affected by cancer) amongst key stakeholders and policy makers.

Macmillan Healthcare Lottery Ltd

Registered Company (no. 9771479), Gambling Commission License no. 44253

Provides funding and support for Macmillan Professionals including nurses engaged in health or social care and funding specially designed cancer treatment centres in the UK.

Responsible person: Janine Windust who can be contacted at the company's registered office.
The subsidiaries are all registered at 89 Albert Embankment, London, SE1 7UQ.

Operating Licenses

Each Macmillan Lottery is registered with the Gambling Commission and has been issued with the necessary operating licences.

- Remote Lottery Licence – to be used for the promotion of lotteries via the internet, telephone, television or any other electronic or technological method of communication.
- Non-Remote Lottery Licence – to be used for the promotion of lotteries via non-electronic means, such as door to door, venue fundraising or print.

Personal Licenses

Macmillan Lotteries operate under an Annex A licence structure.

In line with the Licence Conditions our lotteries must have licences held by persons who hold a qualifying position within the organisation which permits them to make arrangements for the lottery and its operation.

Each licence holder must be registered and have been issued with a licence by the Gambling Commission. Each licence holder will be allocated a key area of the lottery function for which they will have ultimate responsibility. These areas have been determined by the Gambling Commission as being necessary to have a "responsible person."

Macmillan has 3 licence holders under the Annex A structure who each have specified management offices of responsibilities.

Fair and Open Draws

Macmillan Lotteries are committed to conducting their lotteries in a fair and open manner. It does so by ensure the following:

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Terms and conditions - Significant terms:

Macmillan will ensure that all significant terms are available to all participants prior to entry through both remote and non-remote channels. These being but not excluded to:

- Cost of entry
- Closing date
- Draw date
- Prizes available
- Entry route
- Minimum age of entry.

A full list of Terms and Conditions will be published on the Macmillan website:

<https://macmillan.safeandsecurewebservices.net/draw/rules>

Presentation of Licensing information

Macmillan will ensure that all lottery tickets, promotional material and its website will state:

- Licensed and regulated by the Gambling Commission.
- The operating license numbers.
- The Gambling Commission logo
- Details of the Gambling Commission website.

Changes

Any significant changes to these terms will be notified to the Gambling Commission as a minimum 28 days prior to them coming into effect.

Customers will be notified of these changes prior to them coming into effect, either by updating the lottery website, or where a change in terms may affect the persons eligibility or choice to play a notification in writing (e.g. post or email) will be sent to each player.

Protecting Children

While it is legally permissible for persons over the age of 16 to play lotteries, Macmillan has made the decision not to allow anyone under the age of 18 to play in any of our lotteries, or any other forms of gaming that Macmillan may choose to promote. This change to our Terms and Conditions came into effect on 13 August 2018. Any person aged between 16 - 18 who was already playing the lotteries prior to this date can continue to play. No new players in this age bracket will be permitted.

Macmillan will not permit sales of tickets to any person in vulnerable circumstances to participate in any of our lotteries, or any other forms of gambling that Macmillan may promote.

Minimum age of entry

Lottery rules, marketing, and promotional literature (including lottery tickets) will clearly state the minimum age required to enter. And where applicable the 18+ logo.

Macmillan has implemented the following procedures to ensure that its lotteries do not attract players under the age of 18:

- Lottery ticket sellers will be advised not to invite or allow a person under the age of 18 to play in the Macmillan Lottery.

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- Lottery tickets cannot be sold by anyone under the age of 18. We ensure that our third-party supplier only employ sellers who are over the age of 18.
- All entrants to the Macmillan Lotteries will be asked to self-verify that they are over the age of 18.
- All lottery tickets for Macmillan Healthcare Lottery Ltd will state on the ticket that the ticket must not be sold to any person under the age of 18.
- If a person enters the Macmillan Lotteries stating that they are over the age of 18 and are subsequently found to be under 18, any money paid in relation to the lotteries will be returned to them and where relevant they will forfeit the right to any prize.
- Macmillan will conduct an annual risk assessment of processes in place to prevent persons under the age of 18 from entering. This may include making reasonable improvements that may have become available as technology advances and information improves.
- Macmillan Lotteries do not have prizes where alcohol is included. Where incidental lotteries are operated in local areas and alcohol is included in the prizes, tickets must always state that they are not to be sold to anyone under the age of 18.

Protecting Vulnerable People

In line with Macmillan’s Fundraising with People in Vulnerable Circumstances Policy, Macmillan Lotteries will politely refuse to accept any further participation from people are suspected of being or have been found to be vulnerable.

Macmillan Lotteries will monitor ongoing contact communication with customers e.g. subscription renewals (number of tickets / lines requested), with a view to detecting if a person may have become vulnerable following initial sign up.

If it is deemed at such time that this is the case, the customers membership may be cancelled, and future gambling related communications may be terminated.

Where a person has been deemed vulnerable at point of sign up, the registration will be cancelled, and all monies will be refunded to the supporter in line with Macmillan refund policy.

Crime & Disorder

Macmillan Cancer Support is committed to prevent gambling from being a source of, or associated with crime or disorder, or being used to support crime

Due Diligence

Macmillan Lotteries will refuse to contract with any contractors or agents who are suspected of being associated with any potential or actual criminal activities.

Macmillan Lotteries are required to:

- Provide training to new Macmillan employees, and their suppliers.
- Periodic refresher training will be delivered to all employees associated with the Macmillan Lotteries.
- Immediately act to suspend any employee, supplier employee or supplier associated with Macmillan Lotteries if a direct or indirect association with criminal activities is detected.

Software

Macmillan Lotteries will only use gambling software that has been licensed by the Gambling Commission – via our contracted External Lottery Managers – to manufacture, supply, install or adapt software used to promote the lottery.

Administration

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Macmillan lotteries will ensure that lottery administration is conducted from secure premises that have adequate systems and processes in place that

- Restrict access to the buildings and premises
- Control the use of and access to passwords, safes, locked cupboards, computer networks and the internet

Macmillan Lotteries operates a subscription based weekly lottery. Registration is designed to allow for a maximum of two weekly entries per person at the point of entry, where each line is £1. Requests for lines above this quantity will be reviewed prior to approval. In this way the risk of using lotteries for money laundering purposes is minimal.

Macmillan lotteries promotes the sale of both remote and non-remote lottery entries via Direct Debit on a per calendar basis, protecting customers in line with the Direct Debit guarantee.

Sellers of the non-remote subscription lottery tickets, whether door to door, kiosk or telemarketing are not permitted to take cash or cheques in lieu of payment.

Macmillan Cancer Support has an Anti-Money Laundering Policy which outlines responsibilities for identifying any suspicious activity and actions required.

Macmillan Lotteries will not accept suspicious or fraudulent transactions and will report such transactions to the National Crime Agency in line with The Proceeds of Crime Act 2002.

Macmillan Lotteries will provide the Gambling Commission with any information related to any offence under the Act

Responsible Gambling

Most people do gamble responsibly and gambling in moderation is acceptable. However, to keep gambling under control Macmillan Lotteries recommend:

- Remembering that taking part is for fun and not for investing money.
- Setting strict limits on how much time and money to spend – before playing.
- Only gambling with money that can be afforded to be lost.
- Not spending more money on gambling in the hop that it will be won back again.
- Keeping up other interests and hobbies and not letting gambling take over one’s life.
- Not gambling to escape from stress.

How to identify gambling has become a problem

For some people, gambling can become a problem. If some of the following signs are present, it is likely that a gambling problem exists.

- Gambling behaviour is criticised by others.
- Lying to cover up the amount gambled, or the time spent doing it.
- Gambling in response to arguments, frustrations, or disappointments.
- Gambling alone for prolonged periods.
- Staying away from work / college to gamble.
- Reluctance to spend ‘gambling money’ on anything else.
- After losing, feeling you must try to win back the losses as soon as possible.
- When gambling and running out of money, feeling lost, in despair and need to gamble again as soon as possible
- Gambling until the last penny is gone.

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- Lied, stolen, or borrowed just to get money to gamble or to pay gambling debts.
- Feeling depressed or even suicidal because of gambling.

How to get more information and help with problem gambling:

Macmillan Lotteries is committed to supporting people with problem gambling and supporting them to gamble responsibly. The following procedures have been put in place to encouraging responsible gambling and to seek help should gambling have become a problem.

- All ticket dispatches are recorded, and players can request self-exclusion from the Macmillan database from future participation in gambling.
- Macmillan Lotteries is a member of the Lotteries council, an umbrella body which promotes the interests of organisations which run lotteries. The Lotteries Council makes an annual donation to BeGambleAware on behalf of its members.
- Macmillan Lotteries rules on the website and in any promotional literature will advertise the begambleaware logo and website address along with the Gamcare National Gambling helpline number with the following supporting text.
“if you feel you have a problem with gambling visit www.begambleaware.org.uk or call the National Gambling Helpline on 0808 8020 133.

Macmillan Draw Structure

Macmillan Lotteries will endeavour to ensure that it identifies and reacts to any suspected problem gamblers.

Upon receipt of an application to participate in its lottery from a suspected problem gambler Macmillan will:

- Refuse requests for any tickets in excess of recommended maximums.
- Refer the customer to Gamcare.
- Log the customers details in the Macmillan database for the purposes of possible future exclusion.
- Monitor future written and verbal communication.

If an existing customer is suspected of becoming a problem gambler Macmillan Lotteries will:

- Refuse any requests for additional entries.
- Refer the customer to Gamcare.
- Suppress the customers details and exclude from future lottery participation and marketing.
- Refund any money allocated to future draws.

Macmillan Lotteries will initiate customer verification checks to ensure that the customer is aware of the level of gambling currently being undertaken when approached by customers who:

- Wish to purchase 5 or more books of 10 lottery tickets in any raffle scheme (50 tickets)
- Purchase more than 10 lines in the weekly lottery.
- Are suspected of being problem gamblers

Self-Exclusion

Macmillan Lotteries has a self-exclusion process in place for existing and potential players which begins with a request from the customer. A self-exclusion form is available on the lotteries website <https://lottery.macmillan.org.uk/selfExclude> or the customer can contact Macmillan Cancer Support by phone, post or email

Upon receipt of a request to self-exclude from gambling, Macmillan Cancer support will:

- Suppress customer details from any gambling related marketing databases within 2 working days of receiving the completed notification

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- Ensure the exclusion remains in place for a minimum of 6 months.
- Ensure that the self-excluder does not receive any future gambling related marketing materials, unless they have taken positive action to gamble again and the 6-month period has expired, and they have specifically agreed to receive such materials.
- Refund at the earliest convenience any advance payments applicable to the lottery scheme.
- Refer the customer to GamCare, for consideration to self-exclude further than Macmillan Lotteries.

Complaints

All complaints relating to Macmillan Lotteries will be handled in accordance with Macmillan Cancer Support complaint policy with specific accordance to those complaints which may be managed in line with the Gambling Complaint & Disputes Procedure <https://lottery.macmillan.org.uk/draw/complaints-disputes> which is available on the Macmillan Lotteries website.

A copy of this process can be requested via the Macmillan Supporter Care team by phone email or post. All complaints will be managed in accordance with this policy.

Macmillan Lotteries will report any gambling complaints and their status to the Gambling Commission in line with license conditions.

Financial and Information Requirements

All money received by Macmillan Lotteries will be handled in accordance with Macmillan finance and cash handling policies.

Submissions

Macmillan Lottery submissions will be completed by Starvale Technologies Ltd acting on behalf of and following approval from Macmillan. Submissions will be returned to the Gambling Commission within 3 months of date of each lottery draw via the Gambling Commission e-services platform.

Information Requirements

All reasonable efforts will be made to report any information that relates to / is suspected to relate to any offence under the Gambling Act 2005 to the Gambling Commission.

These include but are not limited to any offence resulting from a breach of license conditions or a code provision.

All reasonable efforts will be made to ensure that any Key Events that could have a significant impact upon the nature or structure of a licensee's business are notified to the Gambling Commission. This must be done as soon as is reasonably practicable and in any event within five working days of the licensee becoming aware of the events occurrence.

Key Events are those concerning:

- The operator status
- Relevant persons and positions
- Financial events
- Legal or regulatory proceedings or reports
- Gambling facilities

Macmillan Lotteries will submit an annual Lottery Regulatory Return to the Gambling Commission via the e-services platform.

Procedure

Macmillan Draw Structure

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Macmillan Financial Grants Lottery Ltd, Macmillan Cancer Information Lottery Ltd and Macmillan Influencing Cancer Care Lottery Ltd operate the weekly lottery on a monthly rotational basis. Macmillan Healthcare Lottery Ltd operates a raffle four times per year. (This is also known as the Lottery SuperDraw).

The draw dates and beneficiary society are published 12 months in advance in the Draw Calendar, which can be found on the Macmillan Lottery website: <https://lottery.macmillan.org.uk/draw/draw-calendar-new>

Draw Process

Remote Lotteries – the draw will be conducted using a Random Number Generator (RNG) which has been tested and approved by the Gambling Commission

Non-Remote Lotteries – the draw will be conducted using a manual process which has been approved by the Gambling Commission.

A Macmillan representative will witness a portion of every draw – this witness MUST NOT participate in the drawing of the tickets.

Notification of Winners

Winning numbers will be published on the [Macmillan](#) website.

Macmillan aims to have all winners posted within 5 working days of any draw. However there may be times where this is delayed while we verify details of all winners.

Top prize (£10,000 and £2,500) winners for the quarterly draw will be contacted directly by Macmillan and will be required to supply bank details for the purposes of BACS payment of the prize.

All remaining prize winners’ cheques will be posted directly to the winners. There is no need for a winner to contact to collect their prize

Compliance and Exceptions

Failure to adhere to this policy could result in breaches of the law, breaches of contract and/or reputational damage to Macmillan and could, therefore, result in disciplinary action through the employee procedures or volunteer problem solving guidance.

If there are exceptional circumstances where you believe that this policy does not apply in an individual situation, please seek advice in the first instance from the main contact. If it is agreed that an exception applies, you must obtain written approval from the main contact or the policy owner before proceeding.

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