

## **Law and Disorder Policy**

- Brain Research Trust (ELM) will only conduct their lotteries with a registered External Lottery Manager.
- Our ELM keeps a record of all tickets that have been distributed.
- Our ELM is able to provide information for any police checks of a Lottery Ticket seller that may be carried out. They are able to provide address details and details of any monies sent in for tickets received.
- Our ELM operate from secure premises, with fire safes in situ, and contractors such as Securicor.
- Our ELM processes all entries and handle all monies received for a lottery, however all monies are paid in directly to our own bank account, and banking reports are issued by our ELM on a weekly basis.

### **Policy on Fair and Open Draws**

- All draws are conducted at the ELM's premises in plain sight of staff and ourselves.
- Draws are conducted at random using either a random number generator or using a blind draw.
- Winners results are published on our website, information is also included in letters sent out to players. Winner's information is also available on request.
- Rules are published on websites, on entry forms and the reverse of raffle tickets.
- Printed versions of rules are available on request.
- We have a complaints procedure in place.

### **Responsible Gambling/ Problem Gambling Procedure**

Brain Research Trust have put in place the following procedures to encourage people to gamble responsibly and seek help should gambling become a problem:

- The GamCare helpline number and website address is included on all tickets and entry forms to lotteries, as well as our own website address that includes information on gambling.
- A page on our website is dedicated to encouraging people to gamble responsibly, and recognise the signs of problem gambling. We also include the GamCare's helpline and website details for people to refer to should they need further help.
- There is a restriction in place on the number of ticket books or lottery numbers that can be allocated to an individual. The maximum is 5 lottery books per person.
- Players can request a self exclusion from our database for further lottery mailings.
- Players can request the number of books they would like for an individual lottery and also the number of lotteries they would like to participate in on a yearly basis.

## **Players Queries and Complaints Procedure**

### **Telephone complaints**

- Initial complaints and queries are dealt with over the telephone by the advisers in the telephone room of our ELM.
- A telephone log sheet is completed at the time of the call, detailing the callers contact details, details of telephone adviser who took the call, nature of the complaint and how the complaint was resolved.
- The telephone log sheets will be kept on file for 3 years by our ELM.
- If an initial complaint cannot be resolved, the complaint is logged by our ELM and we are notified immediately of the issue and it is taken internally to resolve.
- All general queries will be logged on the log sheets by the ELM and held for future reference.

### **Written complaints**

- Initial complaints and queries to be responded to in 48 hours of receipt of complaint by the administration team of our ELM.
- All complaints are logged on the complaints log sheet, detailing the individuals contact details, details of the administrator that has dealt with the complaint, the nature of the complaint and what steps were taken to resolve the complaint.
- The complaints log sheets and written complaints will be kept on file at our ELM for 3 years.
- If the initial complaint cannot be resolved by our ELM, the complaint is logged and forwarded immediately to ourselves to be resolved internally.
- All general queries will be logged on the log sheets by the ELM and held for future reference.

## **Protection of Children and the Vulnerable**

We have taken steps to ensure that our lotteries do not attract young people.

We have the following procedures in place to prevent under age players from participating in any lotteries promoted by ourselves:

- On all cold data used by ELM, it is requested that all persons under 16 years of age are excluded from the list before being supplied for the use of our lotteries.
- Where possible we check our database to ensure persons are above the legal age limit before data is supplied for the use of a lottery.
- The minimum age for play is detailed on the back of all tickets and entry forms produced.
- Any player who provides dishonest information regarding their age automatically forfeits the right to any prize. This fact is also stated on the reverse of all tickets and on all entry forms.
- Any player that is found to be under 16 years of age will have any monies paid in relation to the lottery returned to them.
- In the event that a request to cease mailing lottery packs is received from a vulnerable person's carer, we would suppress their details from our mailing database immediately. If the person has been sent a lottery pack as a result of their details being supplied to us through a cold list, we/our ELM will contact the list owner to get the name taken off as well.