

# Raffle policies

Our raffles comply with the following policies:

Please note where the Cystic Fibrosis Trust website is referred to this covers the charity's own website and the microsite raffle portal at [raffleplayer.com](http://raffleplayer.com)

The Cystic Fibrosis Trust conducts the online element of its raffles through CFP Lottery & Raffles Ltd, a registered External Lottery Manager (ELM) licensed by the Gambling Commission. CFP Lottery & Raffles Ltd operate a platform which complies with all relevant codes and remote technical standards.

## Law and disorder policy

- Cystic Fibrosis Trust will refuse to be associated with any proposed lottery scheme or other gambling activity that may breach the law.
- Cystic Fibrosis Trust will refuse to contract with any contractors or agents who Cystic Fibrosis Trust suspects may be associated with any potential or actual criminal activities.
- Cystic Fibrosis Trust will only use suppliers who are licensed by the Gambling Commission (External Lottery Managers), to run all or part of Cystic Fibrosis Trust own lottery/ raffle business.
- Our External Lottery Manager keeps a record of all tickets that have been distributed.
- Our External Lottery Manager 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 External Lottery Manager operates from secure premises, with fire safes in situ, and with contractors such as G4S.
- Our External Lottery Manager processes all entries and handles all monies received for a lottery, although all monies are paid directly in to Cystic Fibrosis Trust's bank account, and banking reports are issued by our External Lottery Manager on a weekly basis.
- Cystic Fibrosis Trust will send cold recipients no more than a maximum value of £20 worth of tickets.

- Cystic Fibrosis Trust will require suppliers and contractors to ensure that all staff and contractors who are likely to be engaged with Cystic Fibrosis Trust to obtain relevant references.
- Cystic Fibrosis Trust will monitor their staff and self-employed agents on an ongoing basis, particularly regarding their direct or indirect association with potential criminal activities.
- Cystic Fibrosis Trust will only use gambling software (a Random Number Generator (RNG)) produced by CFP Lottery and Raffles Ltd who have been licensed by the Gambling Commission to manufacture, supply, install or adapt gambling software to promote a lottery/ raffle.
- Cystic Fibrosis Trust will ensure that it reports any actual or suspected criminal activities to the police.
- Cystic Fibrosis Trust will expect that any suppliers or consultants who are associated with their lottery/raffle will report any potential and actual criminal activities to Cystic Fibrosis Trust as soon as possible
- Cystic Fibrosis Trust 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.
- Cystic Fibrosis Trust staff involved in promoting lotteries/raffles or selling lottery/raffle tickets face to face or via telephone will be trained to a satisfactory standard to ensure compliance with Cystic Fibrosis Trust gambling policy and procedure.
- Cystic Fibrosis Trust will not enroll any person into any of its lottery schemes if that person is suspected of any potential or actual criminal activities
- Online raffle entry facilities are provided by our ELM, CFP, and are PCI compliant.
- Due to a restriction imposed by the local authority, all tickets sent to supporters in Northern Ireland must be purchased by the named individual and not sold on to family or friends. If tickets are found to have been sold on by a supporter in Northern Ireland, those tickets will not be entered into the draw and the money from the sale of those tickets will be returned to the seller (unless the seller wishes to transfer the tickets into their own name). If by error, a ticket sold by a Northern Ireland resident gets entered into the draw, the buyer of that ticket will forfeit the right to any prize and the money from the ticket sale will be returned.

Northern Ireland residents can still be entered into the draw for the Super Seller prize if they return a whole book of 12 tickets, but all of the returned tickets must have been purchased by the named individual and not sold on. If tickets are found to have been sold on, the seller will not be entered into the Super Seller draw. Furthermore, the sold tickets will not be entered into the general prize draw and the money from the sale of those tickets will be returned to the seller (unless the seller wishes to transfer the tickets into their own name). If by error, a Northern Ireland resident gets entered into the Super Seller draw after returning tickets that were sold on, the seller will forfeit the right to any prize and the money from the ticket sales will be returned.

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

- Extra tickets (beyond 60 tickets) will not be made available to players until all monies have been received for existing tickets within that draw, unless customer interaction has occurred. Without customer interaction additional online chances above this limit will not be entered into the draw and additional paper tickets will not be dispatched. Interactions will be recorded and where the tickets are purchased beyond the limit, records will be kept for 3 years.
- For supporters who have a proven track record of selling and returning tickets, an additional 60 tickets (on top of the original tickets) may be sent out without customer interaction, but if tickets are requested beyond this limit customer interaction must occur. Without customer interaction additional online chances above this limit will not be entered in to the draw and additional paper tickets will not be dispatched. Interactions will be recorded and where the tickets are purchased beyond the limit, records will be kept for 3 years.
- Staff will be trained to spot suspicious activity, patterns of play and customer behaviour.
- We 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.

- 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 Cystic Fibrosis Trust.
- We monitor entries received both online and via paper tickets.

## Fair and open draws policy

- All draws are conducted at the External Lottery Manager's premises in plain sight of staff.
- Draws are conducted at random using either a random number generator or using a blind draw.
- Speed prize draws (e.g. super seller and fast replies) will be drawn before any 'main' prize draw takes place. All speed prize draw entries will then be added to the 'main' prize draw.
- Cystic Fibrosis Trust will not accept liability for any incomplete, damaged, illegible entries. In such cases monies associated with tickets will be treated as donations to Cystic Fibrosis Trust.
- Any ticket payments received after the closing date of the draw will be considered as donations to Cystic Fibrosis Trust and treated as such.
- Winning numbers associated with the raffle will be published on the Cystic Fibrosis Trust website. Winning numbers shall also be available by contacting Cystic Fibrosis Trust's Supporter Care Team.
- Rules are published on the Cystic Fibrosis Trust website and on the reverse of raffle tickets.
- Printed versions of rules are available on request.
- Cystic Fibrosis Trust have a complaints procedure in place (please see below).
- A record is kept of both online and ticketed sales, as well as tickets not purchased but distributed regardless of whether they are returned or not.
- Cystic Fibrosis Trust will reserve the right to offer alternative prizes of equal value if, due to circumstances beyond its reasonable control, the stated prizes are no longer available.
- Cystic Fibrosis Trust employees or members of the Board of Trustees of the Cystic Fibrosis Trust cannot purchase tickets in the raffle.

- Online raffle entry services will be provided by our ELM who comply with the relevant technical standards.

## Responsible gambling/ problem gambling procedure

Cystic Fibrosis Trust has put in place the following procedures to encourage people to gamble responsibly and seek help should gambling become a problem:

- The National Gambling Helpline number and Gambleaware.co.uk website address is included on all tickets and entry forms to lotteries as well as our website address that includes information on gambling.
- Information is displayed on our website encouraging people to gamble responsibly and to recognise the signs of problem gambling. We also include the National Gambling Helpline and website details for people to refer to should they need further help.
- To stop receiving unaddressed mail delivered by your postman, visit [the Royal Mail website \(link is an external\)](#).
- 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.
- 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.
- Where customer behaviour indicates problem gambling they will be contacted by our Supporter Contact Team under supervision of senior management and will follow procedures for this contact.
- We restrict the number of tickets a customer can order before customer interaction occurs – see law and disorder policy above.
- 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-raffle enquiries.

- All relevant sources of information will be used to identify customers at risk of problem gambling.
- 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.
- The Cystic Fibrosis Trust makes a contribution each year to help problem gambling via The Responsible Gambling Trust.

## Self-Exclusion Policy

- Players can request a self-exclusion to be added to the Cystic Fibrosis Trust database. Self-exclusion can be selected for an initial period of between 6 and 12 months
- Self-excluded individuals will not be permitted to participate in the lottery for a minimum period of six months and a maximum of twelve months and they will not be permitted to buy any tickets within the period of self-exclusion even if they state they wish to return to gambling during this time.
- Self-excluded individuals are removed from further addressed lottery communications including post, telephone, email and SMS. All self-exclusion requests along with the date of the request will be captured on to the record on the Cystic Fibrosis Trust database. All reasonable steps will be taken to prevent any self-excluded individuals participating in gambling activity.
- 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.
- Self-exclusion can be requested by contacting customer services team on 01628 511 705 or through a web form on [raffleplayer.com](http://raffleplayer.com).
- 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.
- After the self-exclusion period expires an individual may only recommence entry into the charities raffles and lotteries after contacting the customer services helpline. There will be a 24 hour cooling off period after contact is made before entry into a raffle or lottery is possible.

- On request, self-exclusion can be extended for one or more further periods of at least 6 months each.
- Self-exclusion flags will be added to the database within 2 working days of receipt. A record of card numbers to be excluded will also be kept where this is possible and complies with other legislation.
- Records relating to self-exclusion will be kept as long as the self-exclusion plus a further 6 months.
- Staff are trained on self-exclusion and will signpost counselling and support services.
- All staff involved in the raffle will be informed of any attempts by individuals to breach their self-exclusion.
- Self-excluded customers will have any accounts closed and funds returned to them.
- 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.
- Self-exclusion applies only to the cessation of contact on gambling products and ability to enter the draws, to be removed from other charity mailings contact our Supporter Care team on 020 3795 2177.
- In requesting self-exclusion, individual must agree to provide full and accurate personal details, now and in the future, so as to ensure we are able to restrict their access to our services.
- If an individual chooses to self-exclude we will use all reasonable endeavours to ensure we comply with your self-exclusion. However in agreeing to self-exclude individuals accept that they have a parallel undertaking not to seek to circumvent the self-exclusion.
- Records will be kept of any person who attempts to breach their self-exclusion and retained for a minimum of twelve months.

## 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 Cystic Fibrosis Trust:

- On all cold data used by our External Lottery Manager, it is requested that all persons under 16 years of age are excluded from the lists 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 who is found to be under 16 years of age will have any monies paid in relation to the lottery returned to them.
- Winners aged under 18 years old will receive cash prizes only, no alternative prize will be offered or provided.
- In the event that a request to cease mailing lottery packs is received from a vulnerable person's carer, we suppress them from any future communications related to raffles and lotteries. If the person has been sent a lottery pack as a result of their details being supplied to us through a cold list, we will advise the carer of how to have that person's details removed from the list owner's mailing records too.
- Any portals for remote customers will carry a warning before chances are purchased stating that underage gambling is an offence. Customers will then be required to confirm they are of legal age.
- If in doubt, Experian Age Verification and/or GB Group Age Verification will be used to ascertain the age of the entrant.
- The age verification system will be reviewed regularly and we will implement all reasonable improvements that may be made as technology advances and information improves.
- All relevant staff will be trained on the use of age verification procedures.
- The raffle entry website will permit filtering software to restrict the access to relevant pages.
- Neither we, our ELM or other third parties working on our behalf will employ anyone under the age of 18 in connection with our raffle activity.

# Raffle player queries and complaints procedure

## Telephone complaints:

- Initial complaints and queries are dealt with over the telephone by advisers in the telephone room of our External Lottery Manager (the company that manages the lottery on Cystic Fibrosis Trust's behalf).
- Customers may be given a copy of complaints procedure on request.
- A telephone log sheet is completed at the time of the call, detailing the caller's contact details, details of the telephone adviser who took the call, the nature of the complaint and how the complaint was resolved.
- The telephone log sheets will be kept on file for three years by our External Lottery Manager.
- If an initial complaint can't be resolved, the complaint is logged by our External Lottery Manager and we are notified immediately of the issue at which point it is taken internally to resolve in accordance with our feedback policy and procedures which you may read [here](#).
- In the event that a telephone or online complaint cannot be resolved by the External Lottery Manager or representatives of Cystic Fibrosis Trust, 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](mailto:adjudication@ibas-uk.co.uk).
- All general queries will be logged on the log sheets by the External Lottery Manager and held for future reference.

## Written complaints:

- Initial complaints and queries will be responded to within two days of receipt of complaint by the administration team of our External Lottery Manager.
- Customers may be given a copy of complaints procedure on request.

- All complaints are logged on our complaints log sheet, detailing the individual's contact details, details of the administrator who 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 External Lottery Manager for 3 years.
- If the initial complaint can't be resolved by our External Lottery Manager, the complaint is logged and forwarded immediately to Cystic Fibrosis Trust staff to be resolved internally in accordance with our feedback policy and procedures which you may read [here](#).
- In the event that a written complaint cannot be resolved by the External Lottery Manager or representatives of Cystic Fibrosis Trust, third party arbitration will be provided via IBAS. Independent Betting Adjudication Service, PO Box 62639, London, EC3P 3AS, 020 7347 5883, adjudication@ibas-uk.co.uk.
- All general queries will be logged on the log sheets by the External Lottery Manager and held for future reference.
- Cystic Fibrosis Trust will review all feedback and complaints on an ongoing basis so that we may address them, where possible. All lotteries will be reviewed in full at the end of each activity so any learning and issues can be reviewed and considered for future draws.