St Luke's Sheffield's Hospice

Title	St Luke's Gambling Policy
Category	Corporate
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Responsible Director	Tony Saunders, Director of Finance and Chief Operating Officer
Approved by	Approved by Exec April 2026
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Version control

Version	Date issued	Brief summary of changes
2	April 2026	Amendment of ELM & amendments to gambling commission submissions

1. Introduction

1.1. Purpose

1.1.1. This document contains the remote and non-remote gambling policies adopted by St Luke's Hospice (referred to herein as the "**Society**").

1.1.2. The Society is licensed by the Gambling Commission to promote:

a) A non-remote lottery under cover of a licence issued by the Gambling Commission (Gambling Commission Remote Operating Licence Number: **005206-N-306809**)

b) An ancillary remote lottery under cover of a licence issued by the Gambling Commission (Operating Licence Number **005206-A-323656**).

1.2. Scope

1.2.1. The policies outlined within this document must be adhered to in order to ensure that the Society is allowed to continue to legally market and promote its weekly lottery, which is promoted using the "**St Luke's Lottery**" title (referred to herein as the "**Society Lottery**") and any other society lotteries, some of which might also be generally referred to as raffles, grand draws, draws or superdraws ("**Raffles**").

1.3. Policies are provided in relation to:

a) General policy statements

b) Protection of the business from being a source of crime or disorder, being associate with crime or disorder, or being used to support crime*

c) Ensuring that children and other vulnerable persons will be protected from being harmed or exploited by gambling*

d) The promotion of socially responsible gambling

e) Ensuring that gambling is conducted in a fair and open way*

f) Access to premises

g) Information requirements

h) Marketing

i) Complaints and disputes.

* The three primary aims of the Gambling Act 2005.

1.4. All employees and any third-party contractors or agents associated with the Society's lottery business will be:

a) Made aware of the policies and procedures contained in this document
b) Obliged to operate in accordance with them.

1.5. If anyone at the Society wishes to operate any sort of gambling activity not covered in these policies, or one that requires a change to these policies, they must first seek the approval of **Anthony (Tony) Saunders (Director of Finance and Chief Operating Officer).** Any proposed activity must meet all applicable Gambling Commission requirements.

1.6. Responsibility

1.6.1. Tony Saunders (Director of Finance and Chief Operating Officer) is responsible for maintaining this policy document.

2. GENERAL POLICY STATEMENT

2.1. General

2.1.1. St Luke's Hospice will operate its lottery business in accordance with the Gambling Act 2005.

2.1.2. Furthermore, all society lotteries will be operated in full compliance with

a) The Gambling Commission's Licence Conditions and Codes of Practice, dated "January 2026", (the "LCCPs"), under the Gambling Act 2005.

b) The Gambling Commission's **Remote Gambling and Software Technical Standards dated "February 2021" (updated "October 2025")** (the "**RGSTS**"), which outlines the requirements set by the Gambling Commission relating to the timing and procedures for testing (**Remote Only**).

2.1.3. This policy will be updated to reflect any future changes to the Gambling Commission's LCCPs or the RGSTS, or indeed any changes introduced by the Commission in the form of supplements, or clarifications provided in the form of Guidance Notes.

2.2. Small-scale operator status

2.2.1. The Society will operate as a small-scale operator, as defined in the Gambling Act 2005 (Definition of Small-Scale Operator) Regulations 2006.

2.2.2. Any changes the Society requires to the list of employees whose details and responsibilities have previously been provided to the Gambling Commission in relation to the operating licences (as in those qualifying persons actually named within the Society's operating licences), will be advised to the Commission as a key event, via the Gambling Commission's eServices portal, no later than 5 days after the change has occurred.

2.2.3. Any application made in advance of an individual beginning or ceasing to occupy a qualifying position, will specify the date from which the change will be effective from.

2.2.4. The following persons are named as qualifying persons within the Society's operating licences:

- Tony Saunders
- Joasia Lesniak (Application in progress - April 2026).

2.3. Cash handling

2.3.1. The Society will:

a) Ensure that access to any building used for lottery administration purposes is controlled

b) Further ensure that access to any area within the building that is used either for lottery administration purposes or for storage of lottery related records is also controlled.

2.3.2. The Society will ensure that all lottery correspondence is opened in full view of at least least one employee.

2.3.3. All staff will, whenever and wherever possible, ensure that customers' personal details, customers' debit card details and customers' bank account details are stored out of sight, as safely and securely as possible.

2.3.4. All cash and cash equivalents inclusive of bankers' drafts, cheques, postal orders, debit card details and bank account details shall be handled in the company of other members of staff. They shall also be stored out of sight as safely and securely as possible prior to processing and cash equivalents shall be stored overnight in an office safe, once processed.

2.3.5. Customer's debit card details will neither be stored nor transmitted electronically.

2.3.6. All paper-based records containing debit card numbers will be cut out, cross cut and securely shredded once the debit card transaction has been successfully processed, prior to long term storage in a secure storage area.

2.3.7. CVV debit card security numbers will neither be requested nor required.

2.3.8. All banking lodged with the Society will be:

a) Re-counted and cross-checked against the relevant lottery administration paperwork, for lottery banking purposes

b) Manually banked by two members of staff, if a third-party security services company is not utilised.

2.3.9. Lottery applications could be received on the following basis:

a) The preferred, most cost effective and much more secure method of payment, by Direct Debit (minimum £4.34, per entry, per calendar month)

b) Cheque or Postal Order (minimum £26, per entry, per half year).

2.3.10. Lottery tickets must not be sold to a person in any street. For these purposes 'street' includes any bridge, road, lane, footway, subway, square, court, alley or passage (including passages through enclosed premises such as shopping malls) whether a thoroughfare or not. Tickets may however be sold door to door and by way of exception, in a street from a static structure such as a kiosk or display stand (**LCCP Feb 2015**).

2.4. General 'fair and open' provisions

2.4.1. The Society will ensure that:

a) The terms upon which gambling is offered are not unfair under Digital Markets, Competition and Consumers Act 2024 (**LCCP April 2026**)

b) The rules for each lottery are made available to both potential customers, weekly lottery members and any other ticket holders and are set out in plain and intelligible language

c) Weekly lottery members and ticket holders will be notified of any changes to the terms upon which gambling is offered, before they come into effect.

2.5. Display of licensed status

2.5.1. The Society will ensure, as a minimum, that "licensed and regulated by the Gambling Commission" and details of the Gambling Commission's website (www.gamblingcommission.gov.uk) are printed on all lottery tickets.

2.5.2. The Society will as a minimum, also ensure that the following information is displayed on a page which by virtue of the design of the website, customers access before gambling (**Remote Only**):

a) A statement that they are "licensed and regulated in Great Britain by the Gambling Commission"; and

b) The account number allocated to the Society by the Gambling Commission, inclusive of a direct link to a specific page on the Gambling Commission's website, such that the Society's licence status can be easily verified by an actual or prospective customer.

2.5.3. The information identified at 2.5.2 above will also be displayed on each page of the website which offers facilities for gambling in reliance on the licence (**Remote Only**).

2.5.4. Additionally, the Society will recommend for the purposes of consistency, that the information identified at 2.5.2 above will be displayed on:

a) Each page of the website which offers facilities for gambling in reliance on the licence (**Remote Only**)

b) A page which by virtue of the design of the website, customers access before gambling (**Remote Only**)

c) All lottery tickets

d) All marketing literature.

2.5.5. If the Society offers facilities for gambling via their website which are not provided in reliance on their society lottery licence, the Society will ensure that those products which are regulated by the Gambling Commission are clearly distinguished from those which are not (**Remote Only**).

3. PROTECTION OF THE BUSINESS FROM BEING A SOURCE OF CRIME OR DISORDER, BEING ASSOCIATED WITH CRIME OR DISORDER, OR BEING USED TO SUPPORT CRIME

3.1. Lottery schemes

3.1.1. The Society will refuse to be associated with any proposed lottery scheme or other gambling activity that may breach the law.

3.2. Contractors / agents

3.2.1. The Society will refuse to contract with any contractors or agents who the Society suspects may be associated with any potential or actual criminal activities.

3.2.2. The Society will require all contractors to:

a) Obtain references from all prospective employees and self-employed agents that are likely to be associated with the Society's gambling business, ensure that all employees and self-employed agents that are likely to be directly associated with Society's gambling business participate in Gambling related training, inclusive of the requirements outlined within the Proceeds of Crime Act 2002 and the Terrorism Act 2000 (POCA – see 3.3.2 and Appendix 3 also), both prior to commencement of any gambling related activities and on an annually recurring basis, but no later than 18 months since any individual's last training session

b) Ensure that information about responsible gambling and accessing information and help in respect of problem gambling is readily available to all employees and self-employed agents that are likely to be associated with the Society's gambling business

c) Monitor their staff and self-employed agents on an ongoing basis, particularly regarding their direct or indirect association with potential criminal activities

d) Ensure that adequate systems are in place to restrict access to buildings and premises, control use of and access to passwords, safes, locked cupboards, computer networks and internet access.

3.2.3. The Society will only use gambling software i.e. a Random Number Generator ("**RNG**"), produced by suppliers who have been licensed by the Gambling Commission to manufacture, supply, install or adapt gambling software to promote a lottery.

3.2.4. If the Society determines that user interfaces will be required in order to enable customers to directly access its gambling facilities remotely and the necessary software development work needs to be sub-contracted to a third party, then the Society will ensure that (**Remote Only**):

a) Any such user interface complies with the Gambling Commission's Remote Gambling and Software Technical Standards

b) The third party's contract will be promptly terminated if, in the Society's opinion, the user interface does not comply with the Gambling Commission's Remote Gambling and Software Technical Standards.

3.3 Qualified persons and Society employees / self-employed agents

3.3.1. The Society will:

a) Require references from all prospective employees and self-employed agents

b) Complete DBS/Disclosure Scotland checks on all employees and self-employed agents

c) Provide Gambling related training, inclusive of the requirements outlined within the Proceeds of Crime Act 2002 and the Terrorism Act 2000 (POCA – see 3.2.2 and Appendix 3 also), to all Qualified persons. Training will be provided both prior to commencement of any gambling related activities and on an annually recurring basis, but no later than 18 months since any individual's last training session

d) Ensure that information about responsible gambling and accessing information and help in respect of problem gambling is readily available to all employees and self-employed agents

e) Maintain cross checking and monitoring of all staff and self-employed agents, particularly those with responsibility for cash handling and lottery payment processing, by colleagues and staff from other departments

f) Maintain ongoing monitoring of all staff and self-employed agents, particularly regarding their direct or indirect association with potential criminal activities

g) Ensure that adequate systems are in place to restrict access to buildings and premises, control use of and access to passwords, safes, locked cupboards, computer networks and internet access.

3.3.2 St Luke's will maintain procedures for the identification, internal escalation, investigation and reporting of suspected money laundering and terrorist financing concerns in accordance with the Proceeds of Crime Act 2002, the Terrorism Act 2000, the Gambling Commission's guidance for operators other than casinos, and the LCCP.

a) Any Qualified Person, employee, worker, contractor or self-employed agent involved in the Society's lottery activities who knows of, or suspects, the use of criminal property, money laundering or terrorist financing must make an internal report without delay to the nominated manager / Money Laundering Reporting Officer in accordance with St Luke's reporting procedures.
b) Internal reports will be handled confidentially and on a need-to-know basis. The nominated manager / Money Laundering Reporting Officer will assess whether external disclosure is required and, where appropriate, submit a Suspicious Activity Report (SAR) to the UK Financial Intelligence Unit within the National Crime Agency.
c) Where a SAR is submitted, St Luke's will retain the relevant records and any reference number issued and will make any related Gambling Commission notification required under the LCCP.

St Luke's Hospice Money Laundering Reporting Officer is: Tony Saunders.

3.3.3 In 2016, the NCA published "Guidance on submitting better quality Suspicious Activity Reports (SARs)", which can be found, alongside further information, at www.nationalcrimeagency.gov.uk. The Society will have regard to relevant guidance issued by the National Crime Agency and UK Financial Intelligence Unit when considering and submitting SARs.

3.3.4. The Society will report any non-POCA related, actual or suspected criminal activities to the police or other appropriate authority.

3.3.5. The Society will conduct and keep up to date an assessment of money laundering and terrorist financing risks to its business in accordance with the Gambling Commission's Licence Conditions and Codes of Practice, as amended from time to time, and, where applicable, the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017, as amended. The Society will also have regard to the Economic Crime and Corporate Transparency Act 2023 as part of its wider approach to preventing and detecting economic crime.

3.4. Prospective customers / actual customers

3.4.1. The Society will not enrol any person into any of its lottery schemes if that person is suspected of any potential or actual criminal activities.

3.4.2. The Society will advise customers in writing of their weekly lottery membership status and the relevant procedures associated with lottery payments.

4. ENSURING THAT CHILDREN AND OTHER VULNERABLE PEOPLE WILL BE PROTECTED FROM BEING HARMED OR EXPLOITED BY GAMBLING

4.1. Society Lottery Age Limit

4.1.1. While the legal minimum age for participation in a society lottery is 16 years, the Society has adopted a stricter **minimum participation age of 18 years or over** for its Society Lottery as part of its socially responsible approach to gambling. The Society will ensure that its lottery rules, tickets, player journeys and marketing and promotional materials clearly state this 18+ age requirement.

4.1.2. The Society will require that all forms of weekly lottery membership application (for example, paper or electronic lottery application forms, any door-to-door based recruitment, any telemarketing-based recruitment and any form of Raffle-based invitation to purchase lottery tickets) contain a:

a) Request for the applicant's date of birth; and

b) Statement of declaration to the effect that the prospective member meets the Society Lottery Age Limit requirements.

4.1.3. The Society will, on an ongoing basis, conduct random checks of users who self-verify for compliance with age restrictions (**Remote Only - LCCP Feb 2015**).

4.1.4. The Society will review on an annual basis the methodology adopted in order to satisfactorily establish whether or not a potential or actual customer meets the Society Lottery Age Limit requirements and will implement all reasonable improvements that may become available as technology advances and as information improves (**Remote Only**).

4.1.5. The Society will not accept lottery entries from children who the Society know to be under the Society Lottery Age Limit or suspect of being under the Society Lottery Age Limit requirements and cannot prove otherwise by producing acceptable identification documents such as a valid driving licence, passport or identity card. The Society will explain that the operation of the lottery is covered by the Gambling Act 2005 and the minimum Society Lottery Age Limit is consistent with the Society's socially responsible approach to gambling. The Society will refund in full any lottery subscriptions that may have been received.

4.2. Children

4.2.1. It is a criminal offence to invite or allow a child under 16 years old to enter a Lottery (other than certain classes of exempt lottery such as incidental non-commercial lotteries, private lotteries, work lotteries and residents' lotteries). Hence:

a) Disciplinary action will be taken by the Society whenever and wherever possible, if any member of staff or any self-employed agent is proven to have knowingly or recklessly invited a child under the age of 16 to participate in any lottery

b) Commercial action will be taken by the Society whenever and wherever possible if any third-party sub-contractor's member of staff or any self-employed Agent associated with a third-party sub-contractor is proven to have knowingly or recklessly invited a child under the age of 16 to participate in any of the Society's gambling activities.

4.2.2. If a person under the age of 16 is found to have participated in a lottery after the lottery draw has taken place, then a full refund will be made to that person and any prizes that might otherwise have been due to them will not be paid out. If prizes have already been paid out, all reasonable attempts will be made to recover them as / when circumstances permit.

4.3. Suspected problem gamblers

4.3.1. In the event that an application to participate in a Lottery was received from a suspected problem gambler, or an existing customer was suspected of becoming a problem gambler:

a) Any requests for any additional lottery entries / tickets in excess of the recommended maximum (see "**Customer Interaction**" later) should be tactfully refused

b) The customer should additionally be very tactfully referred to GambleAware (see **Appendix 2**), by the appropriate **Representative,** Lottery administrator / supervisor / manager

c) The customer's details should be logged for the purposes of possible exclusion from future participation in any of the Society's Lotteries, should any similar incidents re-occur in the future

d) All written and verbal communications between staff and suspected problem gamblers should be monitored and approved by a Lottery supervisor / manager.

4.4. Self-excluders from gambling

4.4.1. Customers will be given the opportunity to self-exclude either by telephone, in writing (see Self Exclusion Request Form in Appendix 2), or by an automated process using remote communications such as the internet **(Remote Only – LCCP Feb 2015)**

4.4.2. The Society will ensure that procedures are implemented which are designed to identify separate accounts – for example, multiple weekly Lottery entries held by the same individual, such that if an existing customer opts to self-exclude from gambling, they are excluded from all accounts.

4.4.3. The Society will ensure that **non-remote** self-excluders from gambling:

a) Are given the opportunity either to self-exclude immediately without any cooling off period or to consider self-exclusion further e.g. in order to discuss with problem gambling groups such as GambleAware

b) Are removed from any gambling related marketing databases within two days of receiving the completed self-exclusion notification

c) Are excluded for a minimum initial period of twelve months (**LCCP Feb 2015** states "not less than 6 months nor more than 12 months")

d) Can request an extension of the initial self-exclusion period for one or more further periods of at least 6 months each (**LCCP Feb 2015**)

e) Remain self-excluders at the end of the period chosen by the customer, for a minimum of 6 months, unless the customer takes positive action to gamble again (**LCCP Feb 2015**)

f) Are given a 24 hour / one-day cooling off period before being allowed to begin gambling again

g) Will not receive any future gambling-related marketing materials, unless the customer takes positive action in order to gamble again and has specifically agreed to accept such materials (**LCCP Feb 2015**).

4.4.4. The Society will ensure that **remote** self-excluders from gambling:

a) Are given the opportunity either to self-exclude immediately without any cooling off period or to consider self-exclusion further e.g. in order to discuss with problem gambling groups such as GambleAware

b) Are removed from any gambling related marketing databases within two days of receiving the completed self-exclusion notification

c) Are excluded for a minimum initial period of twelve months (**LCCP Feb 2015** states "not less than 6 months nor more than 12 months")

d) Can request an extension of the initial self-exclusion period for one or more further periods of at least 6 months each (**LCCP Feb 2015**)

e) Can request a self-exclusion period of up to at least 5 years (**LCCP Oct 2016**)

f) Remain self-excluders at the end of the period chosen by the customer, for a minimum of 7 years, unless the customer takes positive action to gamble again (**LCCP Oct 2016**)

g) Are given a 24 hour / one-day cooling off period before being allowed to begin gambling again during the period following the end of their initial self-exclusion

h) Will not receive any future gambling-related marketing materials, unless the customer takes positive action in order to gamble again and has specifically agreed to accept such materials (**LCCP Feb 2015**).

4.4.5. In the event that an application to participate in a Lottery was received from a person who has previously advised the Society that they have excluded themselves from participating in gambling:

a) Then the application will be rejected by the relevant Lottery administrator / supervisor / manager and the prospective customer will be advised in writing of the reasons for the rejection and tactfully referred to GambleAware

b) The applicant will continue to be excluded from all future lottery computer draws conducted by the Society

c) All written and verbal communications between staff and the self-excluder should be monitored and approved by a lottery supervisor / manager.

4.4.6. In the event that an existing customer self-excludes from gambling:

a) Any membership held by the self-excluder in the Society's weekly Lottery scheme should be cancelled immediately, in such a way as to ensure that no further future credits are spent

b) Any advance payments applicable to the Society's weekly Lottery scheme should be refunded at the earliest opportunity

c) The customer will be excluded from all future lottery computer draws conducted by the Society

d) All written and verbal communications between staff and the self-excluder should be monitored and approved by a lottery supervisor / manager.

4.5 Other vulnerable people

4.5.1. The Society is committed to ensuring that lottery tickets are not knowingly sold to other vulnerable people such as someone under the influence of alcohol or drugs, or someone who is incoherent, or has, or is showing signs of suffering from dementia or Alzheimer's disease etc.

4.5.2. The Society will politely refuse to accept any new lottery entries from people who have been discovered to be vulnerable or are suspected of being vulnerable, typically by recommending that the customer speaks with a carer or family member, before proceeding with the gambling transaction.

4.5.3. The Society will also monitor ongoing contact or communications with customers e.g. subscription renewals, in order to try and detect whether a person's vulnerability becomes evident, such that the customer's weekly lottery membership can be cancelled and any future gambling-related communications can be terminated.

5. THE PROMOTION OF SOCIALLY RESPONSIBLE GAMBLING

5.1. Information on how to gamble responsibly and help for problem gamblers

5.1.1. The Society is committed to ensure that information about how to gamble responsibly and how to access information and help in respect of problem gambling is readily available to all (see Appendix **2**).

5.1.2. The Lottery rules and any Lottery marketing and promotional literature including any annual Raffle based invitation to purchase Lottery tickets will as far as is reasonably possible, advertise the GambleAware logo, the GambleAware website and GameCare's National Gambling Helpline number (0808 8020 133).

5.1.3. The following text will typically be utilised in support of the GambleAware logo:

"If you feel you have a problem with gambling, visit www.gambleaware.org or call the National Gambling Helpline on 0808 8020 133".

5.1.4. GamCare is a registered charity and has become the leading provider of information, advice, support and free counselling for the prevention and treatment of problem gambling in the

UK. They operate the National Gambling Helpline, provide treatment for problem gamblers and their families, create awareness about responsible gambling and treatment, and encourage an effective approach to responsible gambling with the gambling industry.

5.1.5. GameCare's Freephone National Gambling Helpline (0808 8020 133) and its online equivalent, NetLine, provide live, confidential, one-to-one information, advice and emotional support and signposting to further sources of local or specialist help, including counselling services. Their advisers are specifically trained and can discuss what options are available or offer coping strategies to those who want to change their gambling behaviour.

5.1.6. The Online Forum and Chat Room are available to anyone who wants to share their experiences. Threads include an area for new members, for supporting a problem gambler, recovery diaries, and information about Gamblers Anonymous and Gam-Anon meetings.

5.1.7. GamCare also offer individual counselling face-to-face via their offices in London and Manchester – and via a growing network of Partners throughout Great Britain, as well as online and telephone counselling.

5.1.8. The Society will ensure that all staff associated with the Society's gambling business are made aware that advice is available to customers from GamCare regarding socially responsible gambling and gambling dependency.

5.1.9. A GambleAware poster will be clearly displayed within the Society offices.

5.1.10. The Society will comply with any applicable statutory levy or other mandatory funding requirements imposed by law or by the Gambling Commission in relation to research, prevention and treatment of gambling-related harms.

5.2. Customer account information

5.2.1. Customer account information will be available for weekly lottery administration purposes, such that customer play and spending history can be monitored in order to enable the Society to more easily identify potential problem gamblers.

5.2.2. The Society will ensure that procedures are implemented which are designed to identify separate accounts – for example, multiple weekly lottery entries held by the same individual, such that all of a customer's accounts are monitored and decisions that trigger customer verification are based on the observed behaviour and transactions across all accounts (see also Customer interaction).

5.2.3. Automated Checks will be initiated:

a) Typically, on a quarterly basis for weekly lottery administration purposes, such that customer verification can be triggered in the event that any existing customer is discovered to hold more than 10 entries

b) On an as required basis prior to actually running any weekly lottery incorporating additional chances, such that customer verification can be triggered in the event that any customer has purchased more than 60 additional chances in any weekly lottery scheme

c) On an as required basis prior to actually running any automated Raffle scheme draw, such that customer verification can be triggered in the event that a new customer has purchased more than 1 book of 12 tickets

d) On an as required basis prior to actually running any automated Raffle scheme draw, such that customer verification can be triggered in the event that an existing customer has purchased 5 or more books of 12 tickets.

5.3. Customer verification of multiple entries and possible customer interaction

5.3.1. The Society will initiate customer verification checks that are intended to ensure that the customer is aware of the level of gambling currently being undertaken, when approached by customers who:

a) Wish to take out more than 10 lottery entries per week in any weekly lottery scheme

b) Wish to take out more than 60 additional chances in any weekly lottery scheme

c) Wish to purchase 5 or more books of 12 lottery tickets in any Raffle scheme

d) Are suspected problem gamblers.

5.3.2. Customer verification checks will be completed by the appropriate lottery administrator / supervisor / manager (the "**Society's External Lottery Manager**"), as determined by the Society, in order to try and identify the reasoning behind the proposed gambling transaction. All communications must be approved by the relevant supervisor / manager and treated with the utmost care and discretion, since a grateful supporter may simply be buying a large number of entries / tickets as a means of making a "donation" by way of the Society Lottery /Raffle and face-to-face or telephone communications are therefore preferred.

5.3.3. Once customer verification checks have been successfully completed, the Society's External Lottery Manager will determine whether or not to accept the abnormally high number of entries / tickets required by the prospective customer. This interaction will be logged in the Lottery Complaints Log.

5.3.4. If the Society's External Lottery Manager decides to reject the prospective customer's application, then the prospective customer will be advised in writing of the limit imposed via the rules of the lottery scheme, which is adhered to for the purposes of supporting and maintaining the Society's socially responsible approach towards gambling. This customer interaction will be logged in the Lottery Complaints Log.

5.3.5. In the event that the prospective customer disputes the decision made by the Society's External Lottery Manager, then the decision will be referred to the responsible person within the Society.

5.3.6. Each customer interaction will be logged for future Gambling Commission Annual Regulatory Returns reporting purposes.

5.4. Customer interaction and possible Problem Gambling

5.4.1. The Society will ensure that all employees / self-employed agents:

a) Recognise the types of trigger behaviour that might identify problem gambling, inclusive of changes in personality, aggressive behaviour, persistent requests to increase lottery entries or awareness of other excessive gambling activities etc

b) Report any suspected trigger behaviour directly to their supervisor / manager.

5.4.2. Customer verification checks will be completed, if appropriate, by the Society's External Lottery Manager, as determined by the Society, in order to try and identify whether problem gambling is an underlying factor behind any perceived change(s) in behaviour. All communications must be approved by the relevant supervisor / manager and treated with the utmost care and discretion.

5.4.3. Once customer verification checks have been successfully completed, the Society's External Lottery Manager will determine whether or not to allow the customer to continue playing in the lottery. This interaction will be logged in the Lottery Complaints Log.

5.4.4. If the Society's External Lottery Manager decides to suspend the lottery entry, then the customer will be advised in writing of the decision which is adhered to for the purposes of supporting and maintaining the Society's socially responsible approach towards gambling. This interaction will be logged in the Lottery Complaints Log.

5.4.5. In the event that the customer disputes the decision made by the Society's External Lottery Manager, then the decision will be referred to the responsible person within the Society.

5.4.6. Each customer interaction will be logged for future Gambling Commission Annual Regulatory Returns reporting purposes.

6. ENSURING THAT GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY

6.1. All of the Societies lotteries will be conducted in accordance with a strict set of lottery rules, which will be approved by Tony Saunders (Director of Finance and Chief Operating Officer). These rules will be permanently available to all prospective and actual lottery customers, typically via the Society's website and will also be provided in writing, upon request.

6.2. The Society will advise lottery members of changes to the terms and conditions i.e. the lottery rules associated with any lottery, before they come into effect, via the Society's website.

6.3. A player's guide to each gambling opportunity, such as the weekly lottery, will also be made available to customers via a number of different means, inclusive of but not limited to:

a) The Society's website

b) Weekly lottery tickets, application forms, leaflets, door-to-door recruitment scripts, telemarketing scripts and new members welcome letters

c) Additional chances ask letters

d) Raffle tickets / Raffle ask letters.

6.4. The Society will use all reasonable endeavours to ensure that lottery entries, such as weekly lottery new member applications and renewal payments actually play in the week that they are received, subject to applications and renewals being received on the day of the draw.

6.5. The Society will review standard written communications with the weekly lottery members typically on an annual basis, in order to ensure both their accuracy and effectiveness. The Society will also informally monitor non-standard written communications and verbal communications between staff and lottery members.

6.6. The Society will only use gambling software that incorporates an RNG that has been proven to be random by a Gambling Commission approved third party test house, in order to ensure that customers do not suffer unfair financial loss.

6.7. The Society will ensure that any manual draws are witnessed by at least one Society representative, other than that person manually selecting the winning tickets.

6.8. Any possible disputes over winnings will be investigated by the Society starting from the premise that "the customer is always right". The reputation of the Society will always be a significant factor when making decisions under such circumstances.

6.9. The Society will publish Winning Numbers on the Society's website, for customer awareness purposes. Winning numbers will also be posted out to winners (if specifically requested) for individual lottery draws.

6.10. Prize cheques will, where applicable, be posted out to winners as soon as is reasonably practical (but typically within one working day of the draw being held) in order to ensure that winners do not actually have to claim their prize in person.

7. GAMBLING COMMISSION ACCESS TO PREMISES

7.1. The Society will ensure that all employees and any contractors or agents associated with the Society's lottery business are made aware that:

a) They must co-operate with the Gambling Commission's enforcement officers in the proper performance of their compliance functions

b) The Gambling Commission's enforcement officers have rights of entry to premises, as contained in Part 15 of the Gambling Act 2005

c) They must immediately advise a supervisor or manager and a director in the event of a visit from a Gambling Commission enforcement officer(s).

8. INFORMATION REQUIREMENTS

8.1. The Society will make all reasonable efforts to ensure that the Gambling Commission are provided with any information that they know relates to or suspect may relate to an offence under the Gambling Act 2005, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.

8.2. The Society will make all reasonable efforts to ensure that all key events that could have a significant impact upon the nature or structure of a licensee's business are notified to the Commission as soon as is reasonably practicable and in any event within 5 working days of the licensee becoming aware of the events occurrence, inclusive of those key events specifically itemised within condition 15.2 of the Gambling Commission's LCCP, concerning reporting the following key events groups:

a) Operator status
b) Relevant persons and positions
c) Financial events
d) Legal or regulatory proceedings or reports
d) Gambling facilities.

8.3. The Society will make available to the Gambling Commission such information as the Commission may require about the use made of facilities provided in accordance with the Society's operating licences, the manner in which gambling authorised by the licence is provided and the manner in which the licensee's business in relation to that gambling is carried out, including in particular information about:

a) The numbers of people making use of the facilities and the frequency of such use, inclusive of changes in the number of staff associated with any Lottery scheme where those changes have a material impact on the Society's gambling business

b) The range of gambling activities provided by the Society and the numbers of staff employed in connection with them

c) The licensee's policies in relation to and experiences of, problem gambling.

8.4. The Society will complete and submit the following returns to the Gambling Commission, within the following time periods:

a) Lottery Submissions, within three months of the date of each lottery draw

b) Regulatory Returns, within 28 days of the end of each quarterly period.

9. MARKETING

9.1. The Society will ensure that any incentive, reward scheme, or other arrangement under which the customer may receive money, goods, services or other advantage is proportionate to the type and level of the customer's gambling and is designed in such a way that:

a) The circumstances and conditions to which the benefit is available are clearly described and readily accessible to the customers being offered the potential benefit

b) Neither the receipt nor the value or amount of the benefit is dependent upon the customer gambling for a predetermined length of time or frequency, and the amount of the benefit is not altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered

c) If the value of the benefit increases with the amount the customer spends, it does so at a rate no greater than that at which the amount spent increases

d) If the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.

9.2. The Society will, whenever and wherever possible, limit the value of tickets sent to any one person who is not already either an established donor or a member of the Society Lottery to £12 and will maintain records of tickets distributed and not returned if more than 20 tickets are sent.

9.3. The Society shall comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP - **LCCP Feb 2015**) that apply to the form and media in which it advertises its gambling facilities or services and will apply the principles included within these codes of practice for media not explicitly covered.

9.4. The Society will make all reasonable efforts to ensure that in the event that it contracts with an affiliate in order to permit the affiliate to advertise via the Society Lottery gambling website, that the arrangement will be terminated if, in the sole opinion of the Society, the affiliate is in breach of the advertising codes.

9.5. The Society will not place digital advertisements on websites providing unauthorised access to copyrighted material (**LCCP Oct 2016)**.

9.6. The Society will also publish the proportion of lottery proceeds applied to the purposes of the society for the previous calendar year (**LCCP January 2018)**.

9.7. The Society will ensure that clear, transparent, and easily accessible information is made available to consumers to enable them to make an informed choice prior to participating in a lottery. This must include but is not restricted to details of how proceeds are used, the likelihood of winning a prize and how prizes are allocated (**LCCP July 2020)**.

9.8. The Society will retain best practice to comply with industry codes of practice (**LCCP August 2019**).

9.9. The Society must not contact consumers by direct electronic marketing unless expressly permitted by law and unless the consumer has provided informed and specific consent. Whenever a consumer is contacted, the consumer must be given the opportunity to withdraw consent. If consent is withdrawn, the Society must, as soon as practicable, ensure that the consumer is not contacted by direct electronic marketing again unless the consumer subsequently provides fresh consent. The Society must retain evidence of the consent relied upon. (**LCCP August 2018**).

10. COMPLAINTS AND DISPUTES

10.1. The Society will ensure that a Gambling Commission compliant, Complaints and Disputes Procedure is made available to all potential or actual customers, via the Society's website or upon request.

10.2. The Complaints and Disputes Procedure will be provided to any individual who raises a complaint.

10.3. The Complaints and Disputes Procedure will include arrangements for customers to be referred to an Alternative Dispute Resolution (**ADR**) in a timely manner and within eight weeks of receiving the complaint, if a dispute is not resolved to the customer's satisfaction and the customer has cooperated and not unreasonably delayed the process (see Appendix 1).

10.4. The ADR provider must meet the Gambling Commission's standards as well as the requirements of the ADR regulations and the provider's name is included on the list of providers in the "Alternative dispute resolution (ADR) in the gambling industry - standards and guidance for ADR providers" document available from the Gambling Commission's website (**LCCP October 2019).**

St Luke's Hospice ADR is: The Independent Betting Adjudication Service (**IBAS**) (provided via St Luke's Hospice HLA membership).

11. RECORDS

11.1. Lottery Complaints Logs will be held for a minimum of three years.

12. PROTECTION OF CUSTOMER FUNDS AND DISCLOSURE TO CUSTOMERS

12.1. It is and always has been the Society's policy to:

a) Set up and maintain at least two separate lottery bank accounts per lottery scheme, one to be used as a current account (normally referred to as a main or general account) and one to be dedicated to the distribution and reconciliation of cash prizes

b) Bank lottery entry monies, normally referred to as lottery proceeds, directly into the Society's nominated bank account e.g. the main or general account.

12.2. The Society is aware that:

a) Any funds received remotely in lieu of payment for future gambling that is not specifically allocated to any lotteries, also referred to as customer funds, must be held in a separate client bank account(s) (**Remote Only**)

b) Each customer must be advised in writing whether or not any non-remote or remote customer funds held by the Society are protected. Such advice must be provided to each customer in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to use such funds for gambling until they have done so, both on the first occasion and on the occasion of any subsequent deposit following any change to the Society Lottery terms in relation to such funds.

13. TRAINING

13.1. All employees and self-employed agents will be provided with Gambling related training, both prior to commencement of any gambling related activities and during their employment/engagement, typically on an annually recurring basis, but no later than 18 months since any individual's last training session and will therefore be expected to be familiar with this policy and its requirements in order to ensure that all of their activities comply with them.

14. PERFORMANCE MEASURES

14.1 Annual assessment of materials and procedures against this policy will be undertaken, typically as outlined herein.

15. DATA PROTECTION ACT 2018

15.1 The Society's Data Protection Policy is communicated to all members of staff during the commencement of employment, with refresher training provided on an annually recurring basis and when circumstances dictate such as amends to regulatory compliance dictate.

16. REVIEW PERIOD

16.1 This policy will typically be reviewed on an annual basis, unless any changes to the requirements of the Gambling Commission require the policy to be amended before then.

Appendix 1: – Complaints and Disputes Procedure.

St Luke's Lottery

St Luke's Hospice
Little Common Lane
Sheffield S11 9NE

T: 0114 352 3000
E: lotteryoffice@hospicesheffield.co.uk
www.stlukeslotterysheffield.org.uk

Complaints & Disputes Procedure

St. Luke's Hospice will:

a) Make this Complaints and Disputes Procedure available to a potential or actual customer ("the customer") via the St. Luke's Hospice website www.stlukeslotterysheffield.org.uk, or upon request

b) Handle all complaints in accordance with this Complaints and Disputes Procedure

c) Advise the Gambling Commission on the status of all disputes that are referred to the Promoter (see below).

The Complaints and Disputes Procedure is outlined as follows:

Stage 1	In the event that a customer has encountered a problem or has a concern to raise in respect of the Lottery, then St. Luke's Hospice will in the first instance advise the customer to contact the Lottery Office.
	Any problems or concerns that are brought to the Lottery Office's attention will be formally recorded within the Lottery Complaints Log, initially as an 'incident', for St. Luke's Hospice future analysis and Gambling Commission reporting purposes.
	We aim to respond as soon as possible, but normally within five days. If the investigation of the complaint is likely to take longer than five days, we will write to you to let you know the proposed timescales and next steps, aiming to resolve your complaint within a maximum of 30 days.
	We will investigate your complaint involving relevant parties as necessary.
	We will contact you to let you know the outcome of your complaint and any actions we have taken as a result of this.

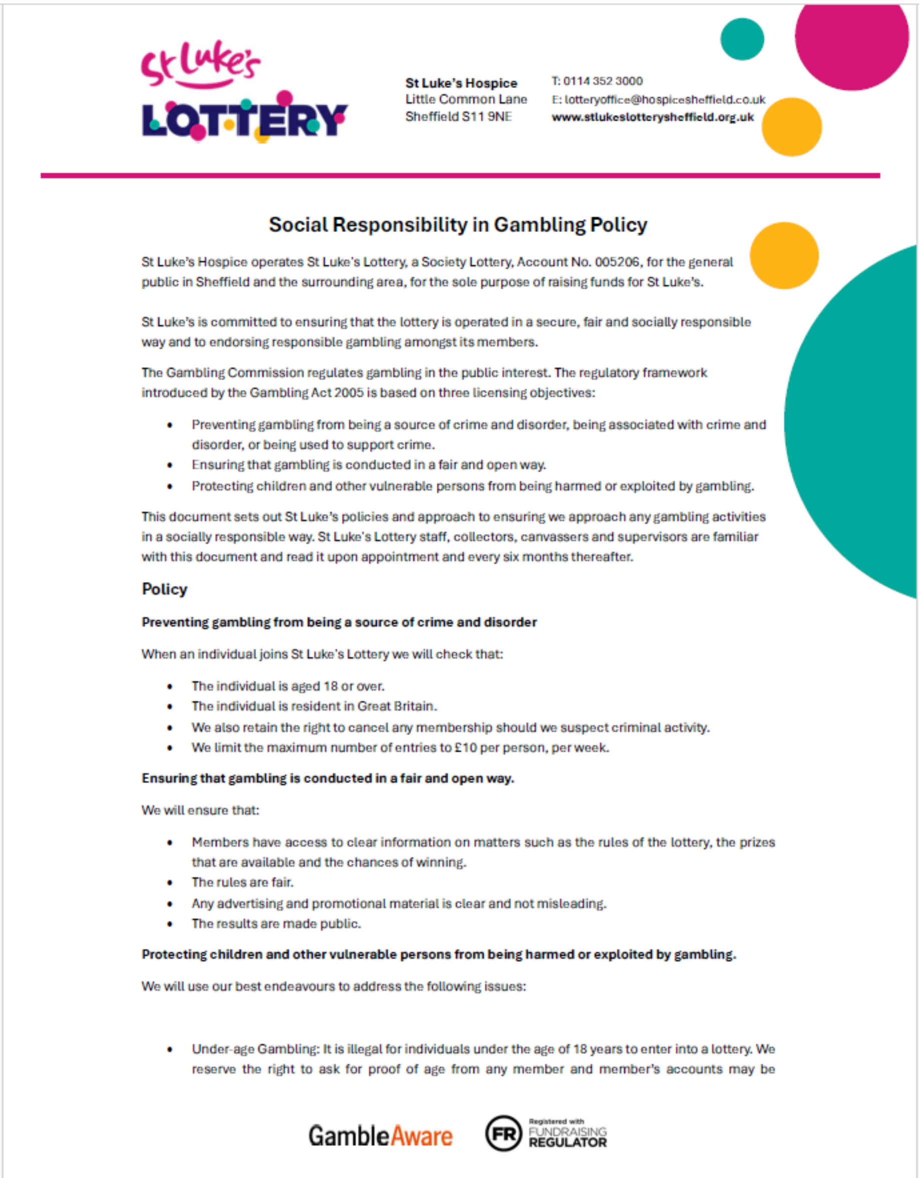
Stage 2	If you are unhappy with the resolution of your complaint, you should put your complaint in writing to Anthony Saunders, St. Luke's Hospice, Little Common Lane, Sheffield S11 9NE
	The matter will be escalated to a 'dispute', if applicable.
	You will then be sent an acknowledgement of your complaint in writing, within 48 hours of us receiving it and an investigation of your complaint will then begin.
	Every effort will be made to complete this investigation within 7 days of receipt.
	We will then contact you with our findings, recommendations and proposed actions.

Stage 3	If you are still not satisfied, we will refer your complaint / dispute to the, free to access Independent Betting Adjudication Service (www.ibas-uk.com) within two months of our decision.
	IBAS will act as an impartial adjudicator after the complaint/dispute has been through both of the above stages of our own internal dispute procedure and a deadlock still exists.
	An IBAS panel of experts will apply their specialist knowledge to the facts and adjudicate by reference to our own terms and conditions.

St Luke's is licensed and regulated in Great Britain by the Gambling Commission under account number 5206. www.gamblingcommission.gov.uk Must be 18 or over to play. Underage gambling is an offence. Promoter: St Luke's, Little Common Lane, Sheffield, S11 9NE. Responsible Person: Anthony Saunders. Registered Charity No. 254402. All proceeds go directly to St Luke's. Full terms & conditions, how proceeds are used and the likelihood of winning a prize can be found on www.stlukeslotterysheffield.org.uk or telephone 0114 352 3000 to request a copy.

GambleAware   Registered with FUNDRAISING REGULATOR

Appendix 2: – Responsible Gambling Guide Including Self Exclusion Request Form.



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E: lotteryoffice@hospicesheffield.co.uk
www.stlukeslotterysheffield.org.uk

Social Responsibility in Gambling Policy

St Luke's Hospice operates St Luke's Lottery, a Society Lottery, Account No. 005206, for the general public in Sheffield and the surrounding area, for the sole purpose of raising funds for St Luke's.

St Luke's is committed to ensuring that the lottery is operated in a secure, fair and socially responsible way and to endorsing responsible gambling amongst its members.

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 persons from being harmed or exploited by gambling.

This document sets out St Luke's policies and approach to ensuring we approach any gambling activities in a socially responsible way. St Luke's Lottery staff, collectors, canvassers and supervisors are familiar with this document and read it upon appointment and every six months thereafter.

Policy

Preventing gambling from being a source of crime and disorder

When an individual joins St Luke's Lottery we will check that:

- The individual is aged 18 or over.
- The individual is resident in Great Britain.
- We also retain the right to cancel any membership should we suspect criminal activity.
- We limit the maximum number of entries to £10 per person, per week.

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

We will ensure that:

- Members 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.

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

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

- Under-age Gambling: It is illegal for individuals under the age of 18 years to enter into a lottery. We reserve the right to ask for proof of age from any member and member's accounts may be suspended until satisfactory proof of age is provided. If, for whatever reason, upon winning any individual is unable to prove that they are 18 years or over then any winnings will be forfeited.

- Gambling Limits: St Luke's may impose limits on the value of entries into a lottery that can be purchased by an individual. This is currently set at a maximum of 10 lottery entries (£10) per person, per week.
- Self-Exclusion: On request, we will close any member's lottery account for a minimum period of six months, during which time the membership cannot be reinstated. During this period we will also try to ensure that the individual does not try and open a new membership.
- Access to Playing History: Existing St Luke's Lottery members may view their playing history at any time by visiting the Members Area of our website at . Alternatively, we will provide any member with a full history of their lottery membership, including complete payment and winnings history, upon request in writing to: St Luke's Lottery, St Luke's Hospice, Little Common Lane, Sheffield S11 9NE, or via email to: lotteryoffice@hospicesheffield.co.uk.
- Information on Gambling Support Organisations: We will provide contact details and/or links on any lottery websites or via other appropriate media to GamCare, Gamble Aware and other relevant / appropriate organisations. We also provide financial support to the Responsible Gambling Trust, which raises funds to support research, education and treatment of problem gambling.
- Self Help and Awareness Information: We will provide self help and awareness information on any lottery websites or other appropriate media together with links to or contact details of GamCare, Gamble Aware and other relevant / appropriate organisations.

Appendix 1: Further information on Responsible and Problem Gambling

Whilst the majority of people do gamble within their means, for some gambling can become a problem. It may help you to keep control to remember the following:

- Gambling should be entertaining and not seen as a way of making money
- Avoid chasing losses
- Only gamble what you can afford to lose
- Keep track of the time and amount you spend gambling
- If you want to have a break from gambling you can use our self-exclusion option by emailing us at lotteryoffice@hospicesheffield.co.uk with your name, address and lottery number(s). We will then close your membership for a minimum period of 6 months, during which time it will not be possible for your account to be re-opened for any reason. Alternatively, you can self-exclude online here.
- If you need to talk to someone about problem gambling then please contact GamCare. GamCare is a registered charity that provides confidential telephone support and counselling to anyone who is affected by problem gambling. GamCare can be contacted on 0808 8020 133. Alternatively you can visit www.gamcare.org.uk or www.begambleaware.org for free advice and support.

Problem Gambling

If you are concerned that gambling may have taken over your (or someone else's) life, then the following questions may help you find out:

- Do you stay away from work, college or school to gamble?
- Do you gamble to escape from a boring or unhappy life?
- When gambling and you run out of money, do you feel lost and in despair and need to gamble again as soon as possible?
- Do you gamble until your last penny is gone, even the fare home or the cost of a cup of tea?
- Have you ever lied to cover up the amount of money or time you have spent gambling?
- Have others ever criticised your gambling?
- Have you lost interest in your family, friends or hobbies?
- After losing, do you feel you must try and win back your losses as soon as possible?
- Do arguments, frustrations or disappointments make you want to gamble?
- Do you feel depressed or even suicidal because of your gambling?

The more you answer 'yes' to these questions, the more likely you are to have a serious gambling problem. To speak to someone about this contact the GamCare confidential helpline on 0808 8020 133 or visit their website www.gamcare.org.uk for further information.

St Luke's LOTTERY

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Gambling Act 2005 – Licence Conditions and Code of Practice

If you feel you have a problem with gambling and would like to request we exclude you from receiving gambling related marketing material, you can simply complete and submit this form.

SELF EXCLUSION REQUEST FORM

Promoter: **St Luke's Hospice**

Customer Name: ______________________

____

Customer date of birth: ______________________

Customer address: ______________________

____

____

PHOTOGRAPH
(if provided)

I have a gambling problem and therefore wish to be excluded immediately from receiving any gambling related marketing material for a minimum period of:

1 Year ☐ 2 Years ☐ 3 Years ☐ 4 Years ☐ 5 Years ☐

6 Years ☐ 7 Years ☐ 8 Years ☐ 9 Years ☐ 10 Years ☐

I acknowledge that I will not be allowed to rescind my self-exclusion during this period.
Following our successful completion of your self-exclusion request:

- Your self-exclusion period will remain in place for further 6 months, unless you take positive action to gamble again with us
- We will not send you any gambling related marketing materials, unless and until you specifically request us to do so.
- You can, on request, extend your self-exclusion period for one or more periods of at least 6 months each.

I acknowledge my responsibility to ensuring adherence to this agreement. I acknowledge that the Promoter, its employees or agents have no liability or claims arising from my voluntary use of the gambling facilities provided.

Signed: ______________________ Date: ______________________
(Customer)

Signed: ______________________ Date: ______________________
(For and on behalf of the Promoter)

FOR OFFICE USE ONLY

Details should be entered in the Self Exclusion Log, reference to: ______________________
Further information on support for problem gambling has been provided to the customer Yes / No *
* Delete as appropriate

Appendix 3: – Proceeds of Crime Act 2002 (POCA)

GAMBLING
COMMISSION

Money laundering
Information for licensing officers and local police

Why you need to know about money laundering and gambling

Licensing authorities have a responsibility to keep crime out of gambling. **Local police, as the case studies in this leaflet show, can gather important evidence in their pursuit of other criminal activity.**

Click here for printer-friendly version

What you can do

Where suspects are known to use gambling establishments (eg betting shops and casinos), for recreational purposes or as part of their criminal business you should contact us on our confidential intelligence line +44 121 230 6655. This will ensure intelligence is secured and evidence is not lost.

We can provide advice and guidance on next steps and signpost to an operator's Money Laundering Reporting Officer (MLRO) – the person responsible for anti-money laundering at a corporate level. Our Financial Intelligence Officers can also provide support with investigations.

When carrying out gambling premises licence inspections licensing officers should check that staff are aware of the mandatory Proceeds of Crime Act **2002 (POCA) reporting requirements. We would also encourage licensing authorities and police to inform one another of any money laundering or POCA offences they may find, and establish a joint approach and investigation where possible.**

Confidential intelligence line +44 121 230 6655

What is money laundering and the proceeds of crime?

The proceeds of crime is property from which a person benefits directly or indirectly by being party to criminal activity.

Money laundering includes the use of funds gained from crime or taking part in any transaction that tries to disguise the origin of those funds.

It involves funds related to all crimes. For example; fraud, corruption, tax evasion, organised criminal activity, terrorism or theft. Money laundering also includes the use of criminal proceeds to pursue leisure activities, such as gambling.

How do criminals launder money in gambling premises?

- They use the fact that much gambling activity in premises is anonymous, for example playing on a gaming machine, they may stake a great deal of money, lose a small amount, and then cash out the rest as 'clean'.
- They may go to a number of gambling premises to avoid the risk of suspicion.
- They may use receipts from gaming machines or betting slips to prove that the cash they have was won through legitimate gambling rather than being illicit money.

What are gambling operators required to do?

Under POCA, all gambling operators have a responsibility to report instances **where they know or suspect that a customer is using the proceeds of crime to** gamble, or is using their gambling facilities to launder money.

Reports submitted under POCA help to prevent and detect crime, and ensure that crime does not pay.

Case study 1: Gaming machine payout receipts don't prove the money is clean

Police executed a warrant at the home of an unemployed man, recovering £18,000 cash and 400 gaming machine payout receipts from various betting operators for sums exceeding £35,000.

He was arrested and, during police interview, claimed that he asked for payout receipts as evidence that the money in his possession was won whilst gambling.

With the support of the Gambling Commission (the Commission), the police asked the manufacturer of the gaming machines to examine server data relevant to the seized payout receipts. Using this data the police, using civil powers under POCA, have retained the money and will seek forfeiture under s294 & s298 of POCA.

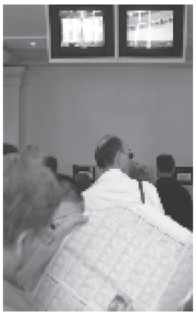
Case study 2: Fighting organised crime

A multi-agency operation aimed at raising the awareness among bookmakers of their duties under POCA, resulted in intelligence that an organised crime group were using gambling premises in the area.

One individual gambled/lost in excess of £1m (including recycled winnings) during the previous 12 months.

Joint activity by the police and the Commission resulted in:
For the bookmaker: regulatory action for failing to comply with regulatory requirements (£120,000 payment to a gambling charity).
For the individuals: an arrest warrant for the man was issued.
For the local police: valuable intelligence regarding organised crime, including group members living and visiting bookmakers in the same area, the frequency of their visits to bookmakers and their level of spend.

Case study 3: An attempt to clean drug money



Local police identified an individual with no legitimate income who was a frequent gambler, often in betting shops from opening until closing time. Police suspected money gained from drug dealing was being 'cleaned' via gambling.

With support from the Commission, the police contacted the betting shops concerned who provided information that the individual mainly took over-the-counter bets, but also used the gaming machines.

He was given a three year custodial sentence for money laundering and drug offences.

Case study 4: Multi-agency operations (Commission work with LAs and police)

In 2014 Enfield Council successfully prosecuted a person for money laundering in relation to the running of an illegal poker club.

The club generated weekly profits of thousands of pounds, and the individual was convicted for money laundering offences. The individual set out to deliberately deceive the LA and ran a professionally organised and well publicised illegal operation.

Enfield Council, the Commission and police worked together to successfully raid the illegal poker club and carry out a full investigation leading to the individual being convicted and the confiscation of his assets under POCA and the club closing.

Further information and advice can be found on our website:

- Proceeds of crime Act 2002: Information for small businesses
- Latest anti-money laundering news

Schemes such as Betwatch also provide a useful means of sharing intelligence.

If you have any further questions or information, please call our intelligence hotline 0121 230 6655 or email info@gamblingcommission.gov.uk

secure email: intelligencereports@gamblingcommission.gov.uk

Gambling Commission ■ Victoria Square House ■ Birmingham ■ B2 4BP
Tel: 0121 230 6666 ■ Fax: 0121 230 6720

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