



Woods - External Lottery Manager Compliance Policy and Overview

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2.0 External Lottery Manager Compliance Policy and Overview

Introduction

Woods Group (Woods) is an External Lottery Manager (ELM) licensed by the Gambling Commission (GC) to help manage and promote lotteries run by UK charities who operate the lottery under their own licence issued by the GC. The sole purpose of these lotteries is to raise funds within the statutory limits set by the Gambling Act 2005 (GA2005) for the charity and their charitable causes.

Woods is licensed as follows:

- Remote Operating Licence number - 000-003586-R-310429-010
- Non-Remote Operating Licence number - 000-003586-N-103664-011.

Remote lotteries are those in which participants take part via any form of remote communication, such as the telephone, internet, television or radio. Non-remote lotteries are those in which participants take part via face-to-face sales. For the avoidance of doubt, Woods does not promote any lotteries itself under its licences, instead it helps UK charities to promote lotteries under their own licence.

Purpose

This document provides details of the Woods remote and non-remote gambling policies and compliance systems. These policies are a requirement for maintaining an ELM Operating Licence and a Society Lottery Operating Licence, issued by the GC, the former held by Woods and the latter held by the charity in question.

This document provides a guide to Woods' clients to help them understand the requirements placed upon them, and Woods, by GA2005. Although Woods will always advise its clients insofar as it is able on compliance matters, it is imperative that clients receive their own, independent, legal advice regarding compliance with their specific licence and, as such, this document and associated information should always be read in that context.

It is the joint responsibility of Woods and its charity partners to ensure the overall compliance of each lottery scheme that they operate together. In addition, all employees and any contractors or agents associated with Woods lotteries must be aware of the policies and procedures contained in this, and associated internal documents. Contractors and agents are contractually obliged to operate in accordance with these and to ensure that, in their dealings related to the licence activities, they act in a compliant manner at all times. Should they fail to do so, Woods is contractually entitled to terminate the relationship.

If anyone at Woods or its charity partners wishes to operate any sort of gambling activity not covered in these policies, or requires a change to these policies, they must first seek approval internally and the approval of the Board of Directors of Woods.

Reference Material

This document is supported by more detailed internal policies and procedures, some of which are detailed below. Collectively they detail how Woods ensures that it remains compliant with the requirements of GA2005, any subordinate legislation and the other requirements of the GC, particularly its Licence Conditions and Codes of Practice (LCCP).

- Cash Handling Policy
- Anti-Money Laundering Policy
- Complaints and Disputes Procedure
- Social Responsibility Policy
- Key Events, Recording and Reporting Policy

This document and the associated policies and procedures will be reviewed at least annually, or more frequently, should any circumstances, particularly the requirements of the LCCP, change.

Responsibilities

Woods is committed to operating in a lawful and compliant manner and will operate its lottery business in accordance with all requirements of GA2005 and subordinate legislation thereunder and other requirements of the GC, particularly those contained in the LCCP. This commitment is organisation-wide.

The Management Team provides leadership and direction in relation to ensuring Woods operates in a lawful and compliant manner, ensuring that Woods' business is conducted in a lawful way.

The Head of Compliance (Compliance Officer) is responsible for overseeing and reporting on compliance across Woods and maintaining the Woods' Compliance Management System.

The Compliance Officer, with support from the Management Team will:

- Ensure Woods remains compliant with the conditions of its operating licences and other requirements of the GC
- Ensure the prompt submission of all required Lottery Returns, Key Event and Notifications and any other matters that need to be reported to the GC
- Ensure all records are kept securely and in-line with legal and regulatory requirements
- Ensure that payment is made promptly of all fees payable for Woods' operating licences
- Ensure all significant compliance breaches are identified, reported and rectified
- Review the Complaints and Disputes and Privacy Policies of Woods
- Act as Social Responsibility Officer with responsibility for the Social Responsibility Policy
- Act as the Money Laundering Reporting Officer (MLRO) for Woods
- Liaise with officers of the GC as required to assist them in the performance of their compliance functions
- Monitor the effectiveness of all of Woods' compliance procedures by, for example, carrying out periodic risk assessments
- Identifying and remedying, as appropriate any money laundering risk to the business
- Review on-going training for Woods' staff on all compliance-related matters.

Legal framework

Woods is an ELM licensed by the GC. The GC is the body set up to monitor all gambling activity in the UK.

Whilst charity lotteries present an extremely low risk, they do however fall within the provisions of GA2005 and Woods and its charity partners have joint responsibility to ensure that they take all reasonable steps to ensure compliance. For a charity to run a lottery, that charity must be licensed by the GC and have the relevant licence for their proposed lottery activity. The correct licence will depend on the gross income the lottery raises or, in the case of a new lottery, the gross income it is expected to raise.

Under no circumstances can a charity run a lottery without the correct licence from the GC. For Woods to be able to assist a charity in promoting its' lottery it must be appropriately licensed as an ELM, and it is part of Woods' responsibility to advise its' charity partners and help them with compliance, ensuring their lottery works within the framework as set out by the GC, subject always to them receiving their own, independent, legal advice where necessary.

Woods will make all reasonable efforts to ensure that the GC is 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 the breach of a licence condition or a code provision.

GA2005

GA2005 has three licensing objectives, as follows:

- To prevent gambling from being a source of crime or disorder, being associated with crime or 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.

3.0 Charity Partners Legal Obligations

Charity Partners must ensure that they have the appropriate licence in place for the type of lottery they are running. Please see the table below.

Society Lottery Operating Licence

Category A	Category B	Category C
Up to £100,000	£100,000 or greater, up to and including £500,000	Greater than £500,000

Charity Partners must:

- Nominate at least one person as being responsible for the promotion of its lottery. The GC recommends having two members of staff on the licence, in order to provide for cover during absence. It must ensure that the named person is an employee and will continue to be so at least until the draw date.
- Ensure that their raffle or lottery is not linked to any other raffle or lottery or indeed skills-based or free-to-enter competition, such that, by entering the lottery, players stand to win more than £400,000.
- Ensure that a set of rules are published and made available in clearly intelligible language to all participants in all lotteries and that all rules are lodged with the GC 28 days prior to the commencement of ticket sales under those rules.
- Ensure all rules for entering each lottery are clear and readily available to participants.
- Regularly review and ensure that the terms upon which gambling is offered are not unfair under the Consumer Rights Act 2015.
- Ensure its marketing and advertising complies with legal and regulatory requirements.
- Ensure incentives, rewards or bonus schemes, or any other arrangements under which a player may receive money, goods or other advantages in relation to gambling comply with the requirements of LCCP.
- Ensure a player's guide for each gambling opportunity is made available to customers via the relevant website for that lottery, weekly lottery tickets, application forms, leaflets, door-to-door recruitment scripts, telemarketing scripts and new members' welcome letters.
- Ensure a list of results is published on their website and all winners notified as per the time periods stated within the published lottery's terms and conditions, either by phone, letter or email.
- Retain all records relating to its lottery, including copies of lottery submissions for a minimum of 3 years.
- Have a complaints and disputes procedure in place.
- Appropriately display responsible gambling logos and links.
- Take reasonable steps to exclude those under 16 from participating in your lotteries.
- Operate an effective and documented self-exclusion scheme and make an annual contribution to research into, education on, and treatment of, problem gambling.
- Have effective procedures in place to detect money laundering and to report suspicious activity.
- Ensure any Key Events, as defined in the Licence Conditions and Codes of Practice (LCCP), are reported to the GC.
- Ensure that all members of staff involved with the lottery or raffle, including those staff members likely to deal first-hand with supporters are aware of these requirements and are appropriately trained.

To support its charity partners in these requirements Woods has the following policies in place:

- Key Events, Recording and Reporting Policy, including the reporting of Key Events to the GC
- Complaints and Disputes Policy and Procedure
- Social Responsibility Policy
- Anti-Money Laundering Policy

- Training Policy

It is important to remember that whilst a charity is making arrangements for a lottery with the assistance of a licensed ELM, the charity is still running the lottery under its own operating licence. This means that the overall responsibility for the lottery remains with the charity. A charity using Woods as its ELM can be assured that it has chosen a professional and licensed operator, however it still has a duty to ensure that the lottery is performed in compliance with the requirements of GA2005, any subordinate legislation and the other requirements of the GC, particularly those contained in the LCCP.

4.0 Woods Services to its Charity Partners

Materials

Woods will ensure that all materials comply with GA2005, most notably to prevent any person under 16 years of age or problem gamblers from playing the lottery. As a minimum, it will ensure all lottery tickets:

- Are numbered uniquely to allow traceability
- Include:
 - The name, address and registration number of the society on whose behalf the lottery is being promoted
 - The name and address of the member of the society responsible for the promotion of the lottery
 - The ticket price
 - The date of the draw, or sufficient information to enable the date of the draw to be ascertained
 - The promoting society is licensed by the GC and provide a link to the GC website
 - A clear statement that persons under the age of 16 may not sell or purchase tickets, and will be unable to receive a prize.

Woods will ensure that all materials offer players the option of self-excluding themselves from future lotteries.

Records

One key role of the ELM is to ensure that full and auditable records of the lottery are kept available. Further details are provided in Woods 's specific Key Events, Recording and Reporting Policy.

It is Woods Policy to keep electronic records of the following:

- Full name and address of all people to whom lottery tickets are sent
- The quantity of tickets sent to each person
- The date tickets were despatched
- The ticket numbers sent to each person
- A full banking history of each sold ticket
- A record of when sold tickets were received

- The method of payment for each sold ticket
- A full record of all tickets returned unsold
- A full record of all tickets not returned
- A record of all winning ticket numbers
- A record of all winners
- Records of total ticket sales, the amounts corresponding to which will be kept separate from records of donations.

It is nevertheless important that the charity itself maintains financial records for each lottery, including the following:

- Details of the total proceeds of each lottery
- Expenses incurred for each lottery
- Percentage of proceeds allocated directly to the purpose(s) of the charity
- Percentage allocated to prizes in each lottery
- Number of unsold tickets in each lottery.

These records will be retained for a minimum of 3 years and made available to the GC on request.

Lottery Rules

Woods places great importance upon the comprehensive rules of all its charity partners' lotteries being clear and readily available to all participants. Whilst the rules of each lottery are the charity's own, Woods works with its partners to ensure that all rules are transparent and fair.

Copies of any new lottery rules will be lodged by either Woods or the charity with the GC at least 28 days prior to the commencement of ticket sales under those rules. All players will be notified by Woods or the charity in advance of any material changes to the rules or terms and conditions of any lottery, before the changes take effect. 'Material changes' include those affecting prize or stake values or the frequency with which the lottery is conducted, and any change to the size of the pool of participants.

Woods will regularly review lottery rules with its clients to ensure that the terms upon which gambling is offered are not unfair under the Consumer Rights Act 2015. All its charity partners' lotteries will be conducted in accordance with the published lottery rules, and a player's guide to each gambling opportunity will be made available to players via the relevant charity website for the particular lottery, and also via its application forms, leaflets, door-to-door recruitment scripts, telemarketing scripts and new members' welcome letters.

Woods employees are not permitted to enter lotteries run by Woods' charity partners and are required to sign a declaration agreeing to this as part of their induction programme.

Segregation of Funds

Woods does not hold any charity partner funds. All lottery proceeds are paid directly into the charity's nominated bank account using secure methods. Once the lottery proceeds have been paid into the charity's bank account, Woods then recoups its charges and expenses arising from it acting as ELM.

As such, it is not necessary for Woods to arrange itself for any segregation of charity funds or disclosure of the relevant mechanism to clients. Charity partners who do hold player funds must keep them separate from trading income and will need to disclose to players whether those funds will be protected in the event of the charity being wound up, together with the mechanism by which this will be achieved.

Lottery Returns

All returns will be processed through Woods's secure processing centre. All funds raised by the lottery are paid in full directly into the charity's nominated bank account using secure methods.

On receipt of returns, Woods will be vigilant in the following respects:

- Where it suspects (after seeing a return) that a person entering the lottery is under 16 years old, a check on that person's age will be made by phone or in writing before entry to the draw
- It will ensure that no person enters the lottery without providing full payment for tickets. Where a charity receives notification of any failed payment they must notify Woods in order for the necessary steps to be taken to remove that supporter from the draw
- It will ensure that any person who has self-excluded themselves from future lotteries is flagged so that they no longer receive any form of promotional material.

It is a condition of a charity's operating licence that returns be made to the GC within 3 months of the draw of the lottery. As an ELM, Woods and the charity are equally responsible for this being completed. Woods will endeavour to send the necessary information through to the charity, to enable them to complete their returns, within 6 weeks of the draw. It is the charity's responsibility to ensure the accuracy of its returns, therefore checks should be undertaken on any returns being completed by Woods on its behalf.

The information that will must be included on the return is as follows:

- The date on which tickets were available for sale or supply and the date of the draw
- The total proceeds of the lottery
- The amounts deducted by promoters of the lottery in providing prizes, including roll-overs
- The amounts deducted by the promoters of the lottery in respect of costs incurred in organising the lottery
- The amount applied directly to the purpose(s) for which the promoting society is conducted (at least 20% of the gross proceeds)
- Whether any expenses incurred in connection with the lottery were not paid for by deduction from the proceeds, and, if so, the amount of expenses and the source(s) from which they were paid.

Woods will retain all accounting records and lottery returns for a period of at least 3 years and make them available to the GC for inspection upon request.

The Draw

The draw for the winners of each raffle ticket draw will be carried out by the charity or Woods. Raffle ticket draws undertaken by Woods will be done manually with appropriate witnesses to ensure that all entries have a fair chance of winning.

Where required by a charity, Woods will publish a list of results and notify all winners within 5 days of the draw taking place, either by phone, letter or email. Charity partners must therefore ensure they review and authorise the winners' details within 3 days of the draw taking place to enable Woods to do this on their behalf. Records of winners will be kept by Woods for 3 years.

Winning numbers will also be available by contacting the Woods Supporter Services Team, and winning numbers will be posted out to winners, where specifically requested.

Prize cheques will, where applicable, will be posted out to winners as soon as is reasonably practicable, to ensure that winners do not actually have to claim their prize in person.

All weekly lottery draws will be conducted using a Random Number Generator (RNG) that has been tested to the satisfaction of the GC in accordance with its Remote Technical Standards (RTS) and Testing Strategy (TS).

Marketing

The GC places various obligations upon licensees surrounding marketing and advertising. Woods is committed to complying with these requirements, which include limitations on offering rewards, bonuses and incentives and the need to comply with the advertising Codes of Practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP), together with any other relevant industry code of practice on advertising.

Woods will ensure that its marketing and advertising follows any other relevant industry code of practice on advertising, notably the Gambling Industry Code for Socially Responsible Advertising, together with any relevant guidance issued by the GC from time to time.

In relation to the sector-specific rules that relate to lotteries, Woods and its charity partners must ensure marketing and advertising:

- Is legal, decent, honest and truthful
- Is not misleading
- Does not exaggerate or omit material information
- Is socially responsible
- States any significant limitations or qualifications, including as to availability, of any special offer, reward, bonus or other incentives
- Does not cause any risk of harm or serious or widespread offence
- Does not condone violence or anti-social behaviour
- Does not exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children, young persons or other vulnerable persons
- Is not likely to appeal to children or young persons, especially by reflecting or being associated with youth culture

- Is not directed at those aged under 16 through the selection of media, or context in which it appears
- Does not feature anyone who is or seems to be under 25 featured gambling or playing a significant role
- Does not portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm
- Does not suggest that participation in a lottery can provide an escape from personal, professional or educational problems such as loneliness or depression
- Does not suggest that participation in a lottery can be a solution to financial problems, an alternative to employment or a way to achieve financial security
- Does not suggest that participation in a lottery can enhance personal qualities, for example to improve self-image or self-esteem or to gain control, superiority, recognition or admiration
- Does not suggest participation in a lottery as a rite of passage
- Does not exploit cultural beliefs or traditions about gambling or luck.

Responsibility for third parties

Woods will ensure that any third parties with which it contracts for any involvement in connection with its' licensed activities are fully trained in compliance with the requirements of GA2005 and the GC, and that its contracts with its suppliers provide for immediate termination, should the contracting party behave in a non-compliant manner.

It is also important that charity partners ensure that any third parties with whom they contract for involvement in connection with licensed activities are similarly bound by contract to act in a compliant fashion. Where offering remote means to purchase lottery tickets, for example via a website, you should ensure that the provider of that website meets the GC's technical standards for remote gambling systems and that that obligation is similarly reflected in your contract with them.

Training

Woods is committed to ensuring all staff are appropriately trained to ensure they are aware of their responsibilities, as well as Woods' legal, regulatory and contractual responsibilities.

Training and awareness will be provided to all staff during their induction programme, annually and after significant changes to Woods' legal, regulatory or contractual requirements.

Training internally will take the form of formal presentations, on the job mentoring, meetings and workshops. Where required, external training will be provided to ensure individuals have the necessary skills and competencies to undertake their role.

Training topics will include, but not limited to:

- Company structure and business
- Woods role as an EML and its relationship with its charity partners
- Responsibilities of each department and members of staff
- The Gambling Act 2005 and LCCP
 - Social Responsibility

- Anti-Money Laundering
- Complaints and Disputes
- Marketing
- Information security
 - GC RTS
 - Data Protection Act
 - PCI DSS

Training records for staff will be retained for a minimum of 3 years.

Complaints and Disputes

All licensees are required to have written procedures for handling supporter/player complaints and disputes. Woods Group recognises the importance of having a fair complaints and disputes process in place which aims to ensure that any complaint is dealt with promptly, fairly and confidentially.

Woods' Complaints and Disputes procedure describes its' process for handling complaints and disputes, made by supporters/players, directly to Woods on behalf of its charity partners. A complaint' means a complaint about any aspect of the charity's conduct of its licensed activities.

Woods is conscious that any response it provides will reflect on the charity, therefore where there is a requirement to formally write to the individual this will always be referred to the respective charity for action. Where an individual requests a copy of the Complaints and Disputes Procedure the individual will be directed to the charity's website, or if a physical copy of the procedure has been requested then this will be referred to the charity to enable them to send the procedure to the individual.

Woods' Complaints and Disputes Procedure

The following section provides details of Woods' Complaints and Disputes Procedure for handling complaints and disputes made, by supporters/players, directly to Woods on behalf of its charity partners:

1. When Woods receive a complaint, it will make a formal record of the details within the respective Complaints and Disputes Log for GC reporting purposes.
2. It will aim to respond to the individual as soon as possible, but normally within 5 working days. If the investigation of the complaint is likely to take longer than this, it will be referred to the charity to enable them to write to the individual to let them know what the proposed time scales and next steps are.
3. Woods will aim to resolve the complaint within a maximum of 28 working days.
4. Woods will investigate the complaint fully, involving all necessary parties including the associated charity.
5. The Woods' Account Management Team will be notified that an entry has been added to the respective log, it is the responsibility of this team to notify the charity and liaise with them on resolution, if required.

6. Upon resolution where a complaint, being handle by Woods, has not been dealt with within 5 working days then the charity must provide the individual, in writing, the outcome of the complaint and any actions it, and where applicable Woods has taken.
7. If an individual is unhappy with the resolution of their complaint, handled by Woods, then this will be escalated to the charity as a 'dispute' if applicable, i.e. if it relates to the outcome of the individual's gambling transaction
8. The charity, in collaboration with Woods, will reconsider the outcomes and contact the individual within 10 working days to advise them of the revised outcome.
9. If the individual is still not satisfied with the outcome, the charity must refer the matter to an Alternative Dispute Resolution (ADR) entity that is approved by the Gambling Commission, such as the Centre for Effective Dispute Resolution or IBAS, if the individual is still not satisfied with the resolution.
10. A copy of the decision on, or a note of the outcome of, each dispute referred to an ADR entity must be provided to the Gambling Commission, either by the charity or the ADR entity.

Note: Access to the ADR entity is free of charge to players and will not restrict players' rights to bring proceedings in any court of competent jurisdiction. The decision of the ADR entity will be binding on both parties.

Woods will retain a record of all complaints received for 3 years after resolution.

Compliance with the RTS, TS and security requirements

Woods will ensure that the remote equipment that it uses is tested and audited as per the GC'S requirements. Woods will comply with the GC's RTS and TS, in order to ensure that customers are not exposed to unnecessary security risk by choosing to participate in remote gambling.

The GC's aim in setting out the security standards is to ensure that customers are not exposed to unnecessary security risks by choosing to participate in remote gambling. The GC has highlighted those systems that are most critical to achieving its aims, and therefore the security standards apply to these critical systems:

- Electronic systems that record, store, process, share, transmit or retrieve sensitive customer information such as credit or debit card details, authentication information, or customer account balances
- Electronic systems that generate, transmit, or process random numbers used to determine the outcome of games or virtual events
- Electronic systems that store results or the current state of a customer's gamble
- Points of entry to and exit from the above systems (other systems that are able to communicate directly with core critical systems)
- Communication networks that transmit sensitive consumer information

Woods is independently audited annually against the requirements of RTS by a qualified auditor, the audit will take place in quarter 1 of each year and will be completed no later than the 31st March. A formal audit report will be produced and provided to the GC.

5.0 Woods Compliance with the Licensing Objectives

All lotteries undertaken by Woods, on behalf of its charity partners, will be conducted in accordance with the published lottery rules.

Woods will use all reasonable endeavours to ensure that lottery entries are processed promptly so that Direct Debit payments are collected at the soonest opportunity, thus ensuring that new players are entered in to the draw as promptly as possible, unless otherwise advised by a new player of a later start date. Should any issues arise with Direct Debit set-up, then customers will be contacted directly to resolve them.

Woods will review standard written communications with weekly lottery members on an annual basis, or more frequently, should the need arise due to, for example, any change to the LCCP, in order to ensure both their accuracy and effectiveness. Woods will also informally monitor non-standard written communications and verbal communications between staff and lottery members.

Key Events and Reporting

Woods' Key Event, Recording and Reporting Policy describes its' requirements for notifying the Gambling Commission (GC) of any Key Events as defined in the Licence Conditions and Codes of Practice (LCCP).

Woods will:

- Inform the GC of the occurrence of Key Events, as defined in the LCCP, within 5 working days of the occurrence of the event
- Ensure all Key Event notifications to the GC include the date the event took place, a description of the event and its outcome
- Key Events include, but not limited to the following:
 - Any material change in Woods' structure or the operation of its business
 - Any material change in managerial responsibilities or governance arrangements
 - The arrival or departure of any individual occupying a key management position or any change to the identity of the Money Laundering Reporting Officer (MLRO) or their Deputy
 - Any petition being presented for the winding up of Woods
 - Any material change in Woods' banking arrangements
 - Any change in Woods' arrangements for the protection of customer funds
 - Any criminal investigation by a law enforcement agency in any jurisdiction involving Woods
 - The imposition by Woods of a disciplinary sanction against the holder of a personal licence or person occupying a qualifying position for gross misconduct
 - Any breach in Woods' information security that adversely affects the confidentiality of supporter data
 - Any change in the identity of the Alternative Dispute Resolution entity used by Woods for the handling of customer disputes

- The commencement or cessation by Woods of trading on website domains.

Woods will:

- Make all reasonable efforts to ensure that the GC is 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 the breach of a licence condition or a code provision.
- Make available to the GC any information they require, as applicable to its operating license, including information about:
 - The numbers of people making use of the facilities and the frequency of such use, including changes in the numbers of staff associated with any lottery scheme where those changes have a material impact on Woods' gambling business
 - The range of gambling activities provided by Woods and the numbers of staff employed involved in those activities

Keeping Crime Out of Gambling

Woods has a Cash Handling Policy which describes Woods' rules for handling cash or cash equivalents (e.g. banker's drafts, cheques, debit cards, monetary vouchers and digital currencies). The following section provides the policy statements from its Cash Handling Policy.

Woods will ensure that:

- Access to Woods information assets and information processing facilities will be in accordance with Woods' Access Control Policy
- Woods premises will be protected in accordance with Woods' Physical and Environmental Security Policy
- Personal data and sensitive personal data, as defined by the Data Protection Act 1998, will be processed in accordance with the Act
- All lottery correspondence is opened in full view of at least one other member of staff
- All cash and cash equivalents are handled in the company of other members of staff
- All cash and cash equivalents are stored securely prior to processing and stored overnight in an office safe, once processed
- Segregation of duties is implemented to reduce to likelihood of theft or fraud
- The processing of cardholder data is done in accordance with the requirements of PCI DSS
- All lottery administration paperwork, including response forms with cardholder data will be handled and retained in accordance with Woods' Information Classification, Handling and Protection Policy
- All banking will be re-counted and cross-checked against the relevant lottery administration paperwork, for lottery banking purposes.

The Woods Anti-Money Laundering (AML) Policy describes Woods' rules for reporting and actual or suspected criminal activities. The following section provides the policy statements from its AML Policy.

It is the policy of Woods to:

- Ensure no person is enrolled into any of its lottery schemes if that person is suspected of any potential or actual criminal activities
- Freeze any transaction that appears to be suspicious, and any other transaction made by the same supporter
- Conduct and regularly review an assessment of the money laundering risks to its business, both remote and non-remote
- Ensure unusual patterns of transactions, and very high account turnover, will be investigated thoroughly
- Train staff to look out for any suspicious activity relating to purchase of lottery tickets
- Ensure all such activity will be reported to a Board member at Woods, Police or National Crime Agency or Serious Organised Crime Agency and the Gambling Commission, where deemed necessary
- Ensure only supporters residing in the UK are permitted to enter lotteries run by Woods on behalf of its charity partners.
- Limit the number of raffle tickets sent to 'warm supporters' to a value of £100, per campaign. Any requests for additional raffle tickets in excess of £100 will be referred to the charity
- Limit the number of raffle tickets sent to 'cold supporters' to a value of £20, per campaign. Any requests for additional raffle tickets in excess of £20 will be referred to the charity. Should more than £20 worth of tickets be distributed to 'cold supporters', a full record will be maintained of where those tickets have been sent to, their total value and their serial numbers
- Maintain a record of all non-returned raffle tickets.
- Limit the maximum number of entries into the weekly lottery draw to £50 per person, per charity, and keep records of all sales
- Ensure no individual will be permitted to purchase more than a total of £2,600 worth of combined raffle tickets and lottery in a year
- Ensure no deposits by players are left unallocated
- Ensure all transactions on a player's account are recorded and securely stored
- Use payment provider(s) that have experienced risk and fraud teams who scan and validate and monitor payment card transactions for potentially suspicious transactions
- All information and records will be retained in-line with Woods' legal and regulatory requirements.

Socially Responsible Gambling

Woods is committed to ensuring that business processes are in place to support the social responsibility policies of its charity partners, as well as its own commitment as a responsible ELM. It has a Social Responsibility Policy which sets out full details of all the measures it has in place to ensure its business operations, including those that apply to gambling services, are conducted in a socially responsible way.

Woods key obligations in relation to socially responsible gambling include:

- Protection of children from harm caused by gambling
- Protection of the vulnerable and problem gamblers
- Responsible gambling information
- Self-exclusion
- Customer interaction
- Identification of individual customers and multiple accounts
- Financial contribution to education on, research into, and treatment of, problem gambling.

The following section provides details of Woods' Social Responsibility Policy as it relates to socially responsible gambling.

Woods will:

- Require its charity partners to ensure that all data is screened to prevent any person aged under 16 being sent lottery packs or data being supplied to under-aged persons for use in the lottery
- Return any entry monies and withhold any prizes in any case where it is found that a player has entered the lottery stating that they're aged over 16 and this is subsequently found not to be the case
- Where suspicion arises conduct random checks of those verifying that they are of age, these checks will include telephoning (where we have their number and permission) and other open source material such as the Electoral Register
- Require any players entering lotteries via remote communication to provide their date of birth and affirm that they are of age
- Ensure all society's websites, hosted by Woods, include the facility to permit filtering software that allows for age related restrictions to be applied
- Protect children and vulnerable persons by ensuring that advertising messages are not aimed at them
- Ensure that all marketing materials clearly state that no person under the age of 16 is permitted to enter
- Ensure that self-exclusion processes are clearly in place and integrated across channels
- Ensure that self-exclusion processes comply with all detailed provisions of the LCCP
- Ensure that any persons who self-exclude do not receive any future marketing of gambling-related products
- Signpost any individuals who self-exclude to organisations where problem gamblers can get help, such as GamCare, and blocking software to block gambling websites
- Inform individuals who self-exclude, via provide a statement to explain that software is available to prevent an individual computer from accessing gambling internet sites
- Immediately cancel any participation held by an individual who self-excludes in a weekly lottery scheme immediately and refund any advance payments

- Ensure the period of self-exclusion remains in place for a minimum of six months and requires the individual to take positive action to recommence participation in the relevant lottery/lotteries
- Provide individuals 24 hours 'cooling off' period following instruction they wish to resume gambling before entering them
- Keep full and adequate records of all self-exclusions
- Provide information on responsible gambling to its employees
- Fully and adequately train all customer-facing staff on its policies and procedures for dealing with problem gamblers
- Show commitment to ensuring that lottery tickets are not knowingly sold to vulnerable people such as someone who is under the influence of alcohol or drugs, someone who is incoherent or someone who is suffering from dementia or other cognitive disorders
- Keep customer account information across all accounts to enable customer play and spending history to be monitored accurately in order to enable the identification of potential problem gamblers
- Initiate customer intervention checks in appropriate cases to ensure that the customer is aware of the level of their gambling; in such situation Woods will refer these cases back to the Charity's supporter services team
- Log each customer interaction in the Woods system
- Make information about responsible gambling readily available to all players in a lottery and any lottery marketing and promotional literature.

Fairness and openness

In terms of openness towards the GC, the Woods will maintain all required records as set out above and will report and submit returns to the GC, together with reporting of Key Events, in line with its specific Reporting, Recording and Key Events Policy, to which you should have regard in detail.

All tickets will contain the information required by the LCCP, as follows:

- The price of the ticket
- The date of the draw, or sufficient information to enable the same to be ascertained
- The identity of the promoting society
- The name and address of the responsible person identified by the society
- The fact that this society is licensed by the GC, together with a link to the GC's website.

Woods will ensure that the lottery rules, or any updated lottery rules, are lodged with the GC at least 28 days before sales of tickets in accordance with those rules commence, where requested to do so by a charity. In addition, all players will be notified in advance of any material change to the rules or terms of conditions of any lottery, before the changes take effect. Material changes include those affecting prize or stake values or the frequency with which the lottery is conducted, and any change to the size of the pool of participants.