



**External Lottery Manager
Compliance Policy and
Overview**

External Lottery Manager Compliance Policy and Overview

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Document Details

Document Detail	
Title	External Lottery Manager Compliance Policy and Overview
Type	Guide/Aide Memoire
Effective Date	22 September 2025
Revision Period	Annual

Owner

Name	Function
Paula Robinson	Head of Compliance

Change History

Version	Date	Revision Description
1.0	20 April 2017	Initial version
1.1	10 July 2017	Added section on Key Events and Reporting and removed explicit time period for notification of winners.
1.2	16 May 2018	Reviewed, updated publishing % of proceeds, expanded advice on GC returns information and added reference to GDPR.
2.0	28 August 2018	Reviewed and updated to include requirements under the FR CoFP. Consolidated Woods and Valldata policies, re-branded.
2.1	22 October 2018	Updated complaints and disputes procedure to reflect LCCP changes that come into effect from 31 October 2018.

Version	Date	Revision Description
2.2	24 October 2019	Reviewed, added clarification around protection of funds, updated complaints and disputes section (ADR). Specified that materials need to state that underage gambling being an offence.
2.3	12 February 2020	Updated to reflect minor context changes requested by Gambling Commission in Finalisation Letter dated 29/10/19. Added additional requirements under section '2.0 Society Partners Legal Obligations'
3.0	02 June 2021	Reviewed, updated to include those requirements specific to promoting branded lotteries (Affinity). Included reference to those lotteries licenced by a local authority. Changed charity to society.
4.0	08 July 2022	Reviewed, updated non remote/remote categories (section 2). Updated Lottery Returns section and added reference to exports under Segregation and Protection of Funds
5.0	17 August 2023	Reviewed, added supporting information in prominent text box. Minor terminology and grammar amends
6.0	28 March 2024	Reviewed, added a section on ancillary remote licences. Updated Key Events and Reporting section to include additional information that needs to be reported to the GC (LCCP change coming into effect from 01 April 2024). Minor terminology and grammar amends.
7.0	26 September 2025	Reviewed, updated to include existing and Nov 25 FR CoP. Added section on statutory Levy, amended Fair & Open to be specific to the provisions. Minor terminology and grammar amends.

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1.0 External Lottery Manager Compliance Policy and Overview

Introduction

Woods Group (Woods Valldata) is an External Lottery Manager (ELM) licenced by the Gambling Commission (GC) to help manage and promote lotteries run by UK Societies who operate the lottery under their own licence issued by the GC or registered with a local authority (LA). The sole purpose of these lotteries is to raise funds within the statutory limits set by the Gambling Act 2005 (GA2005) for the Society and their causes.

Woods Valldata is licenced as follows:

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

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 post or face-to-face sales. All lotteries promoted by Woods Valldata as an ELM are done so under the Societies' brand, and in conjunction with the Society.

Purpose

This document provides details of the Woods Valldata remote and non-remote gambling policies and compliance systems. These policies are a requirement for any gambling operator, whether licensed by the GC or registered with a LA.

This document provides a guide to Woods Valldata Charity partners to help them understand the requirements placed upon them, and Woods Valldata, by GA2005. Although Woods Valldata will always advise its Charity partners insofar as it is able on compliance matters, it is imperative that Charity partners 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 Valldata 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 Valldata 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 Valldata is contractually entitled to terminate the relationship.

If anyone at Woods Valldata 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 Head of Compliance at Woods Valldata.

Reference Material

This document is supported by detailed internal policies and procedures, extracts of these policies listed below are included in this document. Collectively they detail how Woods Valldata ensures that it remains compliant with the requirements of GA2005, any subordinate legislation and 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.

Legal framework

Woods Valldata is an ELM licenced by the GC. The GC is the body set up to regulate commercial gambling in Great Britain.

Whilst Society lotteries present an extremely low risk, they do however fall within the provisions of GA2005, Woods Valldata and its Charity partners have joint responsibility to ensure that they take all reasonable steps to ensure compliance. For a Society to run a lottery, that Society must be licenced with the Gambling Commission or registered with a Local Authority for their proposed lottery activity. The correct licence or registration 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.

For Woods Valldata to be able to assist a Society in promoting its' lottery it must be appropriately licenced as an ELM, and it is part of Woods Valldata responsibility to advise its' Charity partners and help them with gambling 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.

It is important to remember that whilst a Society is making arrangements for a lottery with the assistance of a licenced ELM, the Society is still running the lottery under its own operating licence or registration. This means that the overall responsibility for the lottery remains with the Society. A Society using Woods Valldata as its ELM can be assured that it has chosen a professional and licenced 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, particularly those contained in the LCCPs and the Fundraising Regulator's (FR) Code of Fundraising Practice (CoFP).

GA2005

GA2005 has three licencing 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.

Woods Valldata 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.

Responsibilities

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

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

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

The HoC, with support from the Senior Leadership Team will:

- Hold a Personal Management Licence (PML) issued by the GC
- Ensure Woods Valldata remains compliant with the conditions of its operating licences and other requirements of the GC
- Ensure the prompt submission of all required Regulatory 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 Valldata 's operating licences
- Ensure all significant compliance breaches are identified, reported and rectified
- Review the Complaints and Disputes and Privacy Policies of Woods Valldata
- Act as Social Responsibility Officer with responsibility for the Social Responsibility Policy
- Act as the Money Laundering Reporting Officer (MLRO) for Woods Valldata
- 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 Valldata 's 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 Valldata staff on all compliance-related matters.

2.0 Societies Legal Obligations

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

Small Society Lottery Operating Licence

Societies that run lotteries in which ticket sales proceeds do not exceed £20,000 for a single draw or do not have aggregate ticket sales proceeds in excess of £250,000 in any one calendar year may operate without a Commission licence provided, they register with their local authority in the area where their principal office is located

Society Lottery Operating Licence issued by the Gambling Commission

Remote		Non-Remote
Category	Annual Proceeds	Category
F1	Up to £100,000	A1
G1	£100,000 or greater, up to but excluding £500,000	B1
H1	£500,000 or greater, up to but excluding £10 million	C1
I1	£10 million or greater, up to but excluding £20 million	D1
J1	£20 million or greater, up to but excluding £30 million	E1
K1	£30 million or greater	E2

Ancillary Remote

A Society that already holds or is applying for a non-remote society lottery operating licence but wants to accept payments for participation in a remote lottery up to a maximum of £250,000 proceeds per

annum can hold an ancillary remote licence instead of full remote. However, if the lottery is only going to be conducted by remote means, or if remote proceeds will exceed £250,000 per annum, then a full remote society lottery operating licence must be in place.

Requirements:

Societies 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.

The Responsible Person(s), within societies licensed with the Gambling Commission, must hold either a Personal Management Licence (PML) or Annex A licence. The type of licence will depend on whether a society has more than 3 people in a qualifying management position. For further information please refer to the guidance from the GC relating to Small Scale Operators (SSO) and Personal Management License:

[Small businesses and sole traders \(gamblingcommission.gov.uk\)](https://www.gamblingcommission.gov.uk)

[Personal Management Licence \(PML\) guide \(gamblingcommission.gov.uk\)](https://www.gamblingcommission.gov.uk)

- Ensure that 20% of the proceeds of any lottery are applied to the society's purpose, i.e. good cause.
- Ensure that the proceeds of any lottery do not exceed £5,000,000 and the aggregate of the proceeds of lotteries promoted wholly or partly in a calendar year do not exceed £50,000,000.
- Ensure that by entering the lottery an individual is not able to win more than £25,000 by virtue of that ticket, or 10% of the lottery proceeds, if greater.
- Ensure that their lottery is not linked to any other lottery or indeed skills-based or free-to-enter competition, such that a person can win no more than £500,000 in aggregate.
- Ensure that a set of rules are published and made available in clearly intelligible language to all participants in all lotteries. If licenced by the GC, the rules must be 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 LCCPs.
- Publish annually details on the percentage of the total proceeds of lotteries promoted in the previous calendar year. This should be through either their annual report, lottery page of their society website or any other means appropriate to the size and scale of the society.
- Ensure a player's guide for each gambling opportunity is made available 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. You must not make details of winners' public without their permission.

The FR CoP (11.2.3) states that all reasonable steps must be taken to contact all winners within seven days of the draw. The CoP prior to Nov 2025 listed this for lotteries, prize draws and competitions. In the CoP from Nov 2025 any guidance listed for Lotteries is now separate, but this is still stated for prize draws and competitions. WV would however still recommend adhering to the 7 days.

- Ensure players are notified of any material changes to terms before they come into effect.
- 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.

<https://bettingandgamingcouncil.com/uploads/Downloads/IGRG-CODE.pdf>
states the website gambleaware.org should be carried on all print and broadcast advertising where it is feasible, practical, and necessary to do so. It should be presented in such a way that it is clearly legible.

- Ensure lottery websites state that it is a legal offence for someone under 16 to gamble.
- Take reasonable steps to exclude those under 18 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 and LCCP notifications, as defined in the Licence Conditions and Codes of Practice (LCCP), are reported to the GC.
- Ensure that the domain name of the website(s) they or Woods Valldata are hosting on their behalf have been included in their licence with the Gambling Commission.
- Ensure that all members of staff involved with the lottery, including staff members and face to face fundraisers 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 Valldata 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

Woods Valldata will also ensure that all lottery websites it promotes on behalf of a Society includes a link to the Woods Valldata entry on the GC register.

3.0 Woods Valldata Services to its Charity Partners

Materials

Woods Valldata will ensure that all materials it produces comply with GA2005, most notably to prevent any person under 18 years of age, problem gamblers, vulnerable persons from playing the lottery. As a minimum, it will ensure all physical lottery tickets, or electronic ticket confirmations:

- 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 licenced by the GC and provide a link to the GC website
 - A clear statement that persons under the age of 18 may not sell or purchase tickets and will be unable to receive a prize.

Even though the minimum age for society lotteries is 16, the Government is strongly encouraging Societies to switch to 18 prior to any legislation changes being formally introduced on the back of the Gambling Reform whitepaper. All Charity Partners must adopt 18+.

Woods Valldata will ensure that materials:

- Offer players the option of self-excluding themselves from future lotteries
- State that it is an offence for someone underage to gamble.

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 Valldata 's specific Key Events, Recording and Reporting Policy.

It is Woods Valldata's Policy to keep electronic records, only to the extent where Woods Valldata is involved, 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 not sold
- 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.

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

It is nevertheless important that the Society 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 Society
- Percentage allocated to prizes in each lottery
- Number of unsold tickets in each lottery.

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

Lottery Rules

Woods Valldata places great importance upon the comprehensive rules of all its Charity partners' lotteries being clear and readily available to all participants. The rules of each lottery are the Society's own, except those associated with the Affinity Lottery platform these are standard across all Societies using the platform. Woods Valldata will work with its partners to ensure that all rules are transparent and fair.

Copies of any new lottery rules must be lodged by the Society with the GC at least 28 days prior to the commencement of ticket sales under those rules. All players must be notified by the Society 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 Valldata will regularly review lottery rules with its Charity partners to ensure that the terms upon which gambling is offered are not unfair under the Consumer Rights Act 2015. Charity partners must ensure their lottery is conducted in accordance with the published lottery rules.

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

Segregation and Protection of Funds

All lotteries excluding the Affinity Lottery Platform

Woods Valldata does not hold any Society lottery funds. Lottery proceeds are processed through Woods Valldata secure processing centre and paid directly into the Society's nominated bank account. Once the lottery proceeds have been paid into the Society's bank account, Woods Valldata then recoups its charges and expenses arising from it acting as an ELM. Exports are provided which will show all payments made, along with details of the paying in slip reference (cash / cheques) to enable the Society to reconcile payments being received by their bank and payments processed by Woods Valldata. Where a Society receives notification of any failed payment, they must notify Woods Valldata for the necessary steps to be taken to remove that supporter from the draw.

It is therefore not necessary for Woods Valldata to have arrangements in place to segregate Society funds or disclose how funds are protected in the event of insolvency (LCCP requirement 4.1.1 and 4.2.1).

Charity partners who do hold customer funds must keep them separate from trading income and include in the lottery T&Cs how the funds are segregated and protected in the event of the Society being wound up.

The GC advice on whether monies for subscription lotteries are deemed customer funds or not depends on when the funds are committed to a particular lottery and are therefore no longer held for future gambling; at this point they become lottery proceeds e.g. if the player is depositing monies and they are made aware that when money is deposited it has been allocated to the next 'x' amount of draws, this would be deemed lottery proceeds not customer funds. <https://www.gamblingcommission.gov.uk/guidance/customer-funds-segregation-disclosure-to-customers-and-reporting/assessing-whether-you-hold-customer-funds>)

Affinity Lottery Platform

All Players' funds for use in future Affinity Lottery draws are held in trustee status to maintain a separation from Woods Valldata's own trading income. Woods Valldata will pay the lottery proceeds into the Society's bank account in full after each draw and then recoup its charges and expenses arising from it acting as an ELM.

Lottery Returns

It is a condition of a Society's operating licence or registration that returns must be made to the GC or local authority within 3 months of the draw of the lottery. Woods Valldata will endeavour to send the necessary information through to the Society, to enable them to complete their returns, within 6 weeks of the draw. Return's information provided by Woods Valldata after each draw will only include proceeds and expenses relating to the processing performed by Woods Valldata. It is the Society's responsibility to ensure the accuracy of its returns and that they contain all proceeds and applicable expenses relating to that lottery. Woods Valldata, for that reason will not submit a return direct to the GC or local authority on a Society's behalf.

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

- Whether the lottery is branded
- 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, i.e. costs directly associated with that individual lottery such as response costs, salaries/management fees incurred from the running of that individual 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.

Returns must not include:

- Prizes for 'free' or 'incentive' draws, where the class of participants differ from the main lottery, these must not be paid for by the proceeds of the lottery.
- Anything that is paid for from another fundraising budget, central budget or acquisition budget should not be included in the return. This cost has not come from the proceeds of that specific lottery.

Please refer to the [Woods Valldata Lottery Returns Guidance document](#) for more information.

Woods Valldata will retain all accounting records, and lottery returns reports provided to Societies, 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 lottery ticket (physical) draw will be carried out by the Society or Woods Valldata. Ticket (physical) draws undertaken by Woods Valldata will be done manually with appropriate witnesses to ensure that all entries have a fair chance of winning. Full payment for tickets must be received before a person can be entered into the lottery.

All electronic and 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).

Details of winners must not be publicly published without the winner's explicit consent, and all winners must be contacted within seven days of the draw. The Society must make all reasonable efforts to award prizes to the holders of winning tickets. Any prize donated back to the Society by a winner must be shown in the Society's accounting records as a donation.

Any unclaimed 1st or 2nd prize on the Woods Valldata Affinity or Aspire lottery platforms must be returned to the Insurance company; they are not permitted to be treated as a donation. Any winner wishing to donate these prizes back to the Society must pay the winnings into their own account before donating the winnings.

Records of winners will be kept by Woods Valldata for 3 years.

Winning numbers will also be available by contacting the Woods Valldata 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.

Marketing

The GC places various obligations upon operators surrounding marketing and advertising. Woods Valldata 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 Valldata 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 Valldata 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 18 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
- Carry the required social responsibility and age requirements on consumer facing marketing content on their YouTube channels.
- Uses the Twitter age-screening function when marketing to consumers.

Responsibility for Third Parties

Woods Valldata will ensure that any third parties with which it contracts for any involvement in connection with its' licenced 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 licenced 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 Valldata is committed to ensuring all staff are appropriately trained to ensure they are aware of their responsibilities, as well as Woods Valldata 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 Valldata legal, regulatory or contractual requirements.

Training internally will take the form of formal presentations, e-learning, 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 Valldata role as an ELM 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 / UK-GDPR / General Data Protection Regulation
 - PCI DSS
 - ISO 27001

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

Complaints and Disputes

All operators are required to have written procedures for handling supporter/player complaints and disputes. Woods Valldata 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 Valldata Complaints and Disputes procedure describes its' process for handling complaints and disputes, made by supporters/players, directly to Woods Valldata on behalf of its Charity partners. This does not cover complaints where a Charity partner has requested, they are processed as 'whitemail' or transferred directly to the Charity partner via phone.

For the purposes of this document 'complaint' means an expression of dissatisfaction, whether spoken or written, about any aspect of the way the licensee conducts their licensed activities, e.g. a complaint:

- about the outcome of a gambling transaction
- about the way a gambling transaction has been managed
- that concerns the way the licence holder carries out its business in relation to licensing objectives.

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

Woods Valldata Complaints and Disputes Procedure

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

Recording and Notifying

- All complaints and disputes will be formally recorded within the appropriate Complaints and Disputes Log for GC reporting purposes by Supporter Services.
- Supporter Services will notify Campaign Management when an entry has been added to the respective log.

- Campaign Management will notify the Society within 24 hours when an entry has been added to the respective log to ensure that the supporter receives acknowledgment of the complaint within 3 working days.

Resolution

- Any complaint Supporter Services has not been able to resolve on initial contact with the supporter will require resolution by the Society.
- Where the complaint relates to the Woods Valldata service offering this will be investigated fully, involving all necessary parties including the associated Society.
- Campaign Management and/or Supporter Services will liaise with the Society on resolution, if required.
- Resolution of a gambling related complaint, including escalation should take no longer than eight weeks from when the complaint was first received (this period can be extended if the supporter fails to respond to a reasonable request for information within seven days).
- If an individual is unhappy with the resolution of their gambling related complaint, or it remains unresolved after eight weeks the Society must then write to the supporter with a final letter to explain:
 - the final decision
 - that this is the end of the Society's complaints process, and
 - how to escalate their complaint to a Gambling Commission approved Alternative Dispute Resolution (ADR) entity, if they wish to.
- 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 Woods Valldata, the Society or the ADR entity.
- A record of all complaints and disputes will be held for 3 years

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

Compliance with the RTS and Security Requirements

Woods Valldata will ensure that the remote equipment that it uses is tested and audited as per the GC'S requirements. Woods Valldata will comply with the GC's RTS in order to ensure that remote gambling facilities provided by Woods Valldata do not expose a Society to unnecessary security risks.

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 Valldata is independently audited annually against the requirements of RTS by a qualified external auditor, the audit will be completed no later than the 30 November. A formal audit report will be produced and provided to the GC upon request. A redacted copy of the report (removing personal data and confidential restricted information) will be provided to the relevant Societies for their own records and for submission to the GC when requested.

4.0 Woods Valldata Compliance with the Licencing Objectives

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

Woods Valldata will use all reasonable endeavours to ensure that weekly lottery entries are processed promptly so that Direct Debit payments are collected at the soonest opportunity, thus ensuring that new players are entered into the draw as promptly as possible, unless otherwise advised by a new player of a later start date.

Charity partners are required to 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 LCCPs, change in Responsible Person etc. to ensure both their accuracy and effectiveness.

Key Events and Reporting

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

Woods Valldata 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
- Inform the GC of other reporting events in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable
- Ensure all Key Event notifications to the GC include the date the event took place, a description of the event and its outcome
- Raise a SAR (suspicious activity report) with the National Crime Agency if there is knowledge or suspicion of money laundering or terrorist financing.
- Key Events and other reportable events (LCCP Notifications) include, but not limited to the following:
 - Any material change in Woods Valldata 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 Valldata
 - Any material change in Woods Valldata banking arrangements
 - Any change in Woods Valldata' arrangements for the protection of customer funds
 - Any criminal investigation by a law enforcement agency in any jurisdiction involving Woods Valldata

- The imposition by Woods Valldata of a disciplinary sanction against the holder of a personal licence or person occupying a qualifying position for gross misconduct
- Any breach in Woods Valldata information security that adversely affects the confidentiality of supporter data
- Any change in the identity of the Alternative Dispute Resolution entity used by Woods Valldata for the handling of customer disputes
- The commencement or cessation by Woods Valldata of trading on website domains
- Any person who has gambled via Woods Valldata's platforms who has died by suicide, whether such suicide is known or suspected to be associated with gambling.
- Knowledge or suspicion of money laundering or terrorist financing, or fraud.
- Change of Head Office or registered address.
- Change of trading name.
- Adding or removing licence activity.
- Fee category changes.

Woods Valldata 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 licence, 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 Valldata gambling business
 - The range of gambling activities provided by Woods Valldata and the numbers of staff employed involved in those activities

Keeping Crime Out of Gambling

Woods Valldata has a Cash Handling Policy which describes Woods Valldata 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 Valldata will ensure that:

- Access to Woods Valldata information assets and information processing facilities will be in accordance with Woods Valldata Access Control Policy
- Woods Valldata premises will be protected in accordance with Woods Valldata Physical and Environmental Security Policy
- Personal data and sensitive personal data, as defined by applicable data protection laws, will be processed in accordance with those laws
- 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 fireproof safes, 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 Valldata 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 Valldata Anti-Money Laundering (AML) Policy describes Woods Valldata 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 Valldata 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 Valldata, Police or National Crime Agency or Serious Organised Crime Agency and the Gambling Commission, where deemed necessary
- Ensure only supporters residing only in GB, or if applicable UK, are permitted to enter lotteries run by Woods Valldata on behalf of a Society.
- Limit the number of lottery tickets sent to 'warm supporters' to a value of £100, per campaign if a Society has not set their own limit. Any requests for additional tickets in excess of the limit will be referred to the Society
- Ensure that Charity Partner's limit the number of lottery tickets sent to 'cold supporters' to a value of £20, per campaign. 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 the individual ticket numbers
- Maintain a record of all un-sold tickets
- Limit the maximum number of entries into a lottery draw to £50 per person, if a Society has not set their own limit, and keep records of all sales
- Ensure no individual will be permitted to purchase more than a total of £2,600 worth of combined tickets for a Society in a year, if a Society has not set their own limit
- 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
- Ensure all lottery proceeds are either paid directly to the society at the point of debiting the player, or paid directly to the society within one week of the associated lottery draw
- Ensure any change to the identity of the MRLO will be reported to the Gambling Commission as a 'Key Event' within 5 working days of the change

- All information and records will be retained in-line with Woods Valldata legal and regulatory requirements.

Socially Responsible Gambling

Woods Valldata 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 Valldata key obligations in relation to socially responsible gambling includes:

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

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

Woods Valldata will:

- Require its Charity partners screen all mailing data to prevent any person aged under 18 being sent lottery packs or data being supplied to under-aged persons for use in the lottery
- Withhold any prizes in any case where it is found that a player has entered the lottery stating that they're aged over 18 and this is subsequently found not to be the case
- Require its Charity partners, where suspicion arises to conduct random checks of those verifying that they are of age. These checks can include telephoning 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 legal age
- Ensure all society's websites, hosted by Woods Valldata, 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 it is a legal offence for a person under 16 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
- Provide details of any persons who self-exclude to the associated Society so they 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, GambleAware and blocking software to block gambling websites
- Inform individuals who self-exclude, via 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 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. The following indicators are used to detect whether a supporter is vulnerable:
 - Physical and mental medical conditions (both permanent and temporary conditions), such as disability, learning difficulties, incoherent or someone who is suffering from dementia or other cognitive disorders
 - Times of stress or anxiety e.g. bereavement, redundancy
 - Financial vulnerability e.g. purchasing a lottery ticket may impact on the supporter's ability to sufficiently care for themselves, or leave them in financial hardship
 - English not being the supporter's first language
 - Under the influence of alcohol or drugs
- Review supporter activity in order to identify potential problem gamblers, in such a situation Woods Valldata will refer these cases back to the Society's supporter services team
- Log each customer interaction in the Woods Valldata system
- Make information about responsible gambling readily available to all players in a lottery and any lottery marketing and promotional literature.

Statutory Gambling Levy

Under the Gambling Levy Regulations 2025 all GC licensees are required to pay a statutory levy. The levy fund will be directed in specific proportions for the purposes of research, prevention and treatment of gambling-related harm.

The levy fee will be invoiced on an annual basis and will be based on the licensee's activity for the previous financial year. Society lotteries will be charged 0.1% as a proportion of proceeds retained after all good causes and prizes are paid out i.e. 0.1% of the lottery expenses minus prizes. Charity Partners are responsible for paying their own levy. This fee is in addition to any annual licence fee the society must pay for each type of GC license it holds.

Fair and Open Provisions

The LCCPs include 'fair and open' provisions therefore all Charity Partners must:

- Publish on the lottery website:
 - A description of the way in which winners are determined and prizes allocated.
 - The prizes available - a list of all prizes
 - The likelihood of winning a prize; this can be an estimation based on the current size of the weekly lottery, or an estimation based on a similar lottery completed.

- Publish information about how lottery proceeds are spent; this can be an approximate figure based on the previous financial year, and should include:
 - The percentage of the proceeds spent on expenses related to promoting and running the lottery
 - The percentage or amount of the proceeds applied directly to the purposes of the society
 - The total proceeds from all tickets sold.
- 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.
- 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. In addition, all players must 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.