

## Raffle policies

### Law and Disorder Policy

British Red Cross conducts their raffles through CFP Lottery & Raffles Ltd - a registered External Lottery Manager (ELM) licensed by the Gambling Commission. CFP Lottery & Raffles Ltd operate a platform which complies with all relevant codes and remote technical standards.

The ELM (CFP Lottery & Raffles Ltd) operates the payment function and are responsible for the payment of income back to the charity. Ticket and chance distribution records are available for police checks.

British Red Cross will only use gambling software (a Random Number Generator (RNG)) produced by CFP Lottery and Raffles Ltd which has been approved by the Gambling Commission.

Banking reports are issued by the ELM (CFP Lottery & Raffles Ltd) to an agreed schedule. They will provide contact and payment details of any monies received.

### Protection of Customer Funds

All funds from your ticket purchase are credited to a client account held with Natwest on behalf of raffleplayer.com, which is entirely separate from raffleplayer.com's trading accounts. This is a key requirement of the Gambling Commission's licence compliance and is there to protect both you and the charity. When a raffle takes place, proceeds are paid directly from this account to the charity.

### Fair and Open Draws

We operate a combined online/offline draw ensuring that each entrant has an equal chance of winning each prize. The draw will be conducted by utilising a Random Number Generator that has been tested and approved by an independent, Gambling Commission approved, third party test house in combination with a blind draw in plain sight of staff. The results of the draw are final.

We publish draw results on our website and in letters to players. Rules are also available on our website. Rules and results are always available on request.

A list of winners' names (and their towns) will also be published on the British Red Cross website within two weeks after the draw date. If you win a prize and would prefer that your name and town is not disclosed publicly, please email [supportercare@redcross.org.uk](mailto:supportercare@redcross.org.uk). We may still need to provide this information to a regulator if challenged, to demonstrate that a valid lottery has taken place.

A record is kept of both online and ticketed sales, as well as tickets not purchased but distributed regardless of whether they are returned or not.

British Red Cross will reserve the right to offer alternative prizes of equal value if, due to circumstances beyond its reasonable control, the stated prizes are no longer available.

There is an additional [Charity Complaints Procedure](#).

## **Player's Queries and Complaints Procedure**

### **Telephone complaints**

Our ELM's advisers (CFP) handle initial complaints and queries and will complete a log sheet detailing the caller's and advisor's contact details, the nature of the complaint and steps taken to resolve the complaint.

If an initial complaint cannot be resolved, we are notified immediately of the issue and will resolve it internally.

In the event that a telephone or online complaint cannot be resolved by the ELM (CFP) or representatives of British Red Cross, CFP will provide free third-party arbitration via IBAS. All general queries will be logged and held for future reference. Our ELM (CFP) will retain these telephone log sheets for three years.

### **Written Complaints**

Our ELM's administration team (CFP) will respond to complaints and queries within 48 hours of receiving the complaint.

The subsequent logging and resolution procedure is that of telephone complaints. Complaints log sheets and written complaints are retained by our ELM (CFP) for three years.

In the event that a written complaint cannot be resolved by the ELM (CFP) or representatives of British Red Cross, CFP will provide free third-party arbitration via IBAS.

All general queries will be logged on the log sheets by the ELM (CFP) and held for future reference.

## **Protecting Children & Vulnerable People through Age Verification**

At the British Red Cross, we take steps to ensure that our lotteries do not appeal to children and have measures in place to prevent underage players from taking part:

- > We screen our in-house database to remove anyone who we know to be under eighteen from our lottery direct marketing lists
- > When we are promoting our lotteries, we do not include any imagery or wording which might particularly appeal to children
- > Players must be over the age of 16 to purchase chances, and this is detailed on the back of all tickets and entry forms produced
- > Our online and offline lottery communications warn people that underage gambling is an offence before they can buy a ticket

- > We require people purchasing a lottery ticket online to affirm that they are old enough to take part before paying
- > Any player who provides dishonest information regarding their age automatically forfeits the right to any prize
- > Where we suspect a lottery player be underage, we will carry out online age verification checks and if necessary contact them to establish their age
- > If we are unable to verify the age of a player, the payment will be returned
- > If we are able to verify the age of a player, and they are found to be under the minimum age of entry to one of our lotteries to them, we will return the entry money and any prize they have won will be forfeit
- > Where we recruit players by person or by telephone, we will always confirm their age by asking for their date of birth before they can buy a ticket
- > Once payments have been successfully processed, a confirmation email is sent to entrants confirming their playing status. This email includes a self-certification statement confirming the entrant is over 16 years of age.

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

The following procedures have been put in place to encourage people to gamble responsibly and seek help should gambling become a problem:

- > Our website carries information encouraging people to gamble responsibly and recognise the signs of problem gambling. We also include the National Gambling Helpline and [gambleaware.org](https://gambleaware.org) website details for people to refer to should they need further help.
- > The National Gambling Helpline number and [gambleaware.org](https://gambleaware.org) website address is included on all tickets and entry forms to lotteries as well as our website address that includes information on gambling.
- > Players can request a self-exclusion to be added to the British Red Cross database so that they are removed from further addressed lottery communications including post, telephone, email and SMS. All self-exclusion requests along with the date of the request will be captured on to the record on the British Red Cross database and will be in place for a minimum of six months. All reasonable steps will be taken to prevent any self-excluded individuals participating.
- > To self-exclude please see our self-exclusion policy on our [Problem Gambling](#) page.
- > Staff are trained on self-exclusion and will signpost counselling and support services.
- > To stop receiving unaddressed mail delivered by your postman, visit [the Royal Mail website \(link is external\)](#).

- > A restriction of 50 chances per customer will be in place unless customer interaction occurs. Without customer interaction chances will not be entered into the draw. Interactions will be recorded and where the chances are purchased beyond the limit, records will be kept for 3 years.
- > All relevant sources of information will be used to identify customers at risk of problem gambling.
- > Lotteries are only conducted with an External Lottery Manager (CFP) who is registered with the Gambling Commission (licence number 000-000-584-R-103711-007).

## How to identify if gambling is becoming a problem

The majority of people do gamble responsibly. It may help you to keep your gambling under control by remembering the following:

- > You're taking part for fun - not as a means of investing your money
- > Before playing, set strict limits on how much time and money you're going to spend
- > Quit while you're ahead
- > Only gamble with money you can afford to lose
- > Don't spend more money on gambling, hoping to win back money that you've lost
- > Keep up other interests and hobbies - don't let gambling take over your life
- > Don't gamble in order to escape from stress or boredom
- > Gambling in moderation is okay

For some however gambling can become a problem. If you are concerned about the amount you are gambling, and feel it is taking over your life - or you are concerned for a friend or relative - then the following questions may help you by giving you some guidance.

## Have others ever criticised your gambling?

- > Have you lied to cover up the amount you have gambled or the time you have spent doing it?
- > Do arguments, frustrations or disappointments make you want to gamble?
- > Do you gamble alone for long periods?
- > Do you stay away from work or college to gamble?
- > Do you gamble to escape from a boring or unhappy life?
- > Are you reluctant to spend 'gambling money' on anything else?
- > Have you lost interest in your family, friends or pastimes due to gambling?
- > After losing, do you feel you must try to win back your losses as soon as possible?
- > When gambling and you run out of money, do you feel lost and in despair, and need to gamble again as soon as possible?
- > Do you gamble until your last penny is gone?
- > Have you lied, stolen or borrowed just to get money to gamble or to pay gambling debts?
- > Do you feel depressed or even suicidal because of your gambling?

If you are answering 'yes' to some of these questions, then it is likely that a gambling problem exists. For friendly and helpful advice from trained counsellors call the National Gambling Helpline on 0800 8020 133. The helpline operates 24 hours a day, 7 days a week, 365 days a year.

Sometimes just telling someone about your problem can be a relief and it is the first step towards dealing with your problem. You can also visit the GambleAware website [gambleaware.org](http://gambleaware.org) for more information and advice.

If you wish to give yourself some time to think we offer you the option to time out for the following durations: 24 hours, one week, one month or for a period up to six weeks. To time out please send an email to our ELM (CFP) at [info@raffleplayer.com](mailto:info@raffleplayer.com) with "Charity Name" in the title, and include the period you wish to time out from with your full name and address. Alternatively you can call our raffle helpline on 01628 201283.

## Self-exclusion policy

Whilst most raffle players are able to enjoy their participation in such activity, we recognize that for a very small number of people this form of gambling activity may cease to be fun. For those players who wish to restrict their gambling, we provide a self-exclusion facility. Self-exclusion is a formal process whereby we cease to allow you to participate in our online and direct mail raffles.

Software is available to prevent individual computers from accessing gambling internet sites. Please see <http://www.gamblock.com/> or <http://www.betfilter.com/> for further information.

To self-exclude please send an email to our ELM (CFP) at [info@raffleplayer.com](mailto:info@raffleplayer.com) with 'self-exclusion' in the title and include your full name and address. Alternatively you can call our raffle helpline on 01628 201283, or complete our [online self-exclusion form](#). We shall mark your record accordingly within 2 working days of receipt of your self-exclusion notification. We will hold your details on a register to ensure that you aren't entered into any future draws and that we don't send you any promotional material. If you have purchased chances/tickets in our raffle, and subsequently send us a self-exclusion notification which is received prior to the raffle close date, we will refund your payment and remove you from the draw. The minimum period of exclusion is 6 months. If you would like to enter our raffles and lotteries again after this period, you can call our helpline on 01628 201283.

In requesting self-exclusion, you agree to provide full and accurate personal details, now and in the future, to ensure we can restrict your access to our services. If you do choose to self-exclude, we will use all reasonable endeavours to ensure we comply with your self-exclusion. However, in agreeing to self-exclude you accept that you have a parallel undertaking not to seek to circumvent the self-exclusion. Accordingly, neither our ELM (CFP) nor the charity has responsibility or liability for any subsequent consequences or losses howsoever caused, that you may suffer or incur if you commence or continue gambling by providing misleading, inaccurate, or incomplete details or otherwise seek to circumvent the self-exclusion agreed.

<https://www.raffleplayer.com/redcross/privacy>

## Privacy policy

The protection of personal data is of paramount importance. When you entrust your personal data to us, we go to great lengths to ensure that personal data is held securely and used only for the purposes which you have agreed to.

For our full Privacy Policy relating to all aspects of our data collection and use please go to [www.redcross.org.uk/privacy](http://www.redcross.org.uk/privacy)

In addition to our full Privacy Policy please read the additional information below which is relevant when using the online raffle service.

The data processor of this website is CFP Lottery and Raffles Ltd (company registration number 02596199). Registered office is Suite 1, Beechwood, Grove Park, White Waltham, Maidenhead, Berkshire, SL6 3LW. CFP is registered with the Office of the Information Commissioner under the registration number Z8972055.

## Who we can disclose your personal data to

- > We will disclose your personal data to law enforcement agencies or regulatory bodies if we believe that you are involved in any illegal or harmful conduct or if we are required to do so by law or we believe that such action is necessary.
- > We may employ other companies to provide services for us, including for example, processing of payments. These companies have access to the personal information needed to perform their functions and not for any other purposes and are bound by confidentiality agreements.
- > We have implemented Google analytics features based on Display advertising (Google analytics Demographics and Interest Reporting). You can opt out by going to [www.google.com/settings/ads](http://www.google.com/settings/ads). We may use the data provided by Google analytics to develop the site and make your experience better. Google data collected: Cookie and Usage Data. Place of processing: USA. Find Google's privacy policy here <http://www.google.com/intl/en/policies/privacy/>

We store your personal details on our servers within the European Union and we will not be transferring your data outside the European Union.

If you have any questions regarding your personal data, please contact us at [supportercare@redcross.org.uk](mailto:supportercare@redcross.org.uk).

## Cookies & sessions

What is a cookie or session? A cookie is a text string of information that a website transfers to the cookie file of the browser on your computer's hard disk (or the memory of your mobile device) so that the website can remember who you are. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a randomly generated unique number.

We may use cookies to record information about how you access our website for statistics solely for use. To the extent that these cookies contain personally identifying data, this will be limited to IP addresses only. You can choose not to accept cookies by setting the preferences on your internet browser. If you do not accept cookies, this may impair or prevent some or all of the services which we provide to you.

To find out more about cookies, what they are used for and how to remove them, please visit the Interactive Advertising Bureau Europe's website at <http://www.allaboutcookies.org>

## Our safekeeping of your data

We have implemented all appropriate technical, organisational and security procedures to protect your personal data from unauthorised access or from accidental loss or corruption.

## **How to unsubscribe**

If you do not wish to receive communications from us or if you wish to de-register then you can unsubscribe at any time by sending an email to [supportercare@redcross.org.uk](mailto:supportercare@redcross.org.uk) with your full contact details. We will use these details to remove you from our database. If you wish to see the data stored about you, please send an email to the above address and we will send you all the relevant data.

## **Other websites**

This website may include links to other websites that are outside of our control. We cannot be held responsible for the collection of data on any sites not managed by British Red Cross or CFP.

## **Revisions to the Privacy Policy**

We reserve the right to make changes to our Privacy Policy from time to time.

## **Your consent**

By using this site, you consent to our collection and use of your personal data for the purposes set out in the policy.