

<b>Policy Name</b>	Children and Vulnerable Persons Protection Policy	
<b>Policy Purpose</b>	Ensuring that children and other vulnerable persons, will be protected from being harmed or exploited by gambling.	
<b>Policy Created By</b>		
<b>Policy Created date</b>	October 2019	
<b>Policy Validated and Checked By</b>		
<b>Policy Validated and Checked Date</b>		
<b>Policy Renewal Date</b>		

### Policy Detail

1. Lichfield District Council understands its requirements as part of the LCCP (Licencing Conditions and Codes of Practice) and takes its responsibilities to the protection of Children and Vulnerable persons very seriously. In our wider involvement as a key agency in all aspects of child protection we are well aware of our responsibilities.
2. Lichfield District Council understands that there is a legal requirement to prevent the sale of lottery tickets to under 16's.
  - 2.1. To ensure compliance with this requirement our ELM (Gatherwell Ltd) spot checks new players of the lottery subjecting them to Age Verification checks via an industry recognised third party agency to ensure they are of a legal age to play.
  - 2.2. Age verification service providers can deliver positive results to ensure players are over 18 and therefore Gatherwell has opted to only accept these positive checks as a validation of age.
  - 2.3. As a final check before any jackpot prizes are issued, secondary age validation is also sought (passport, driving licence etc.)
3. To ensure players are aware of the age limitations,
  - 3.1. Clear statements will be displayed on the various websites relating to the required age to play, the age requirement is also highlighted in the terms and conditions that the player signs up to at registration
  - 3.2. In addition Lichfield District Council has enabled its website to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access as relevant.
4. Should it come to pass that the age verification checks proved inaccurate and someone underage had gambled, then the user account would be suspended and monies returned.
5. Marketing falls into two areas:-

- 5.1. Firstly in encouraging good cause participation (where there is a low risk of exposure to children and vulnerable people) and
- 5.2. Secondly in the development of materials that support participation of the individual lotteries.
  - 5.2.1. In this area generic marketing materials are used which can be tailored to deliver a marketing package to each individual good causes to help them market their lotteries
- 5.3. To ensure compliance with the Advertising Codes of Practice advertising materials will regularly be submitted to the Committee of Advertising Practice (CAP) for approval
  
6. As recruitment is undertaken to fill vacancies, if exposed to the direct selling of tickets then
  - 6.1. Applicants will need to be of a legal age to do so. And educated on the legal requirement to not sell tickets to children under the age of 16.
  - 6.2. Training is also undertaken for staff and our umbrella good causes – see our Implementation of Procedures Policy.
  
7. Player Accounts require validation and set up.
  - 7.1. In the instances of direct debit the Direct Debit Guarantee ensures a time lag between ticket purchase and the first draw.
  - 7.2. As draws take place once per week, Ticket purchases are therefore not capable of being purchased for immediate play and
  - 7.3. for internal process reasons even credit & debit card payments cannot facilitate instant play into a draw for that week and a minimum of one days lag will be effective.
  - 7.4. The combination of these factors does ensure it limits the capability to facilitate instant gambling and therefore significantly reduces the risk of gambling whilst under the influence of drink or other substances.



Gambling commission questions:-

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

- What are your policies and procedures to prevent underage gambling?*
- What information will you display relating to underage gambling?*
- What age verification procedures will you have in place?*
- What would you do if you discover someone underage had gambled?*
- How will you prevent someone who is underage entering adult only areas?*
- What are your procedures relating to the employment of young people?*
- What steps will you take to ensure that any products and services you offer are not of particular appeal to children or young people?*
- What marketing and advertising will you be carrying out? How will you ensure you are compliant with the Advertising Codes of Practice and the LCCP?*
- What would you do if you felt someone was not capable of making an informed decision about gambling, for example, because of mental health problems, learning disabilities or substance misuse relating to alcohol or drugs?*
- What age verification procedures will you have in place to prevent underage gambling online?*

