

Socially responsible gambling

This policy applies to ClientEarth's operation of a Promoting Society Lottery for the general public in the United Kingdom according to the Gambling Act 2005 regulations. ClientEarth holds a Remote Licence and a Non-Remote Operating Licences from the Gambling Commission.

ClientEarth operates a society lottery for the sole purpose of raising funds for its work fighting climate change and protecting the environment.

ClientEarth has entered into a service agreement with an External Lottery Manager (ELM), the Postcode Lottery Limited which trades as the People's Postcode Lottery (PPL) to manage the lottery on its behalf.

ClientEarth will ensure that all staff associated with ClientEarth's lottery activities are made aware that advice is available to lottery players from GambleAware regarding socially responsible gambling and gambling dependency.

The following guidelines will be provided to the members of the public who participate in lotteries operated by ClientEarth. We will ensure these guidelines are included on our public website and we will provide links to PPL's website.

Guidelines for responsible gambling

Whilst the majority of people do gamble within their means, for some, gambling can become a problem. The following is offered as guidance to help keep gambling under control:

- Gambling should be entertaining and not seen as a way of making money
- Avoid chasing losses
- Only gamble what you can afford to lose
- Keep track of the time and amount you spend gambling

If you want to have a break from gambling, you can use our self-exclusion option by contacting us via the information and link on the website.

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, to give you some guidance.

- Have others ever criticised your gambling?
- Have you ever lied to cover up the amount you have gambled or 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?

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- 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?

ClientEarth is committed to ensuring that information about responsible gambling and accessing information and help in respect of problem gambling is readily available to all. Accordingly, ClientEarth will donate a minimum of 0.1% of their annual Gross Gambling Yield directly to GambleAware.

If you are concerned that gambling may have taken over your own or someone else's life, then please contact a service such as [GambleAware](#), or 0808 8020 133 ,alternatively a full list of organisations which provide help and advice is available through the [Gambling Commission website](#).

Self-Exclusion

ClientEarth will ensure that the ELM closes any customer/player accounts who has entered into a self-exclusion agreement and return any funds held in the customer/player account. The minimum self-exclusion period for non-remote gambling is of a duration of not less than six months and no more than 12 months. In terms of remote gambling the minimum self-exclusion period is six months up to five years. At the end of the period, the self-exclusion remains in place, unless the customer takes positive action in order to gamble again.

No marketing material will be sent to the individual unless the individual has taken positive action in order to gamble again, and has agreed to accept such material. Where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again, the customer will be given 24 hours to cool off before being allowed to reactivate their play.

Ensuring gambling is conducted in a fair and open way

ClientEarth will conduct its activities in a fair and open way by ensuring:

- a) Player's funds held by the ELM are protected from insolvency, with lottery proceeds held separately from any other income and in approved accounts
- b) Draws are carried out fairly by the ELM using their operating systems (remote and non-remote) which adhere to industry standards and are approved by the Gambling Commission
- c) That safeguards are in place to prevent fraudulent transactions
- d) Promotion of draws is carried out by our ELM and is in line with the LCCP, consumer law and follows the Committee on Advertising Practice and ClearCast guidelines
- e) Providing players access to clear information on matters such as the rules of the lottery and the prizes that are available, and notification of changes are submitted to the Gambling Commission 28 days in advance
- f) Any changes to terms and conditions are communicated promptly to lottery players
- g) Lottery players are made aware that ClientEarth is licensed by the Gambling Commission

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- h) A Lottery Self-Exclusion Policy is in place
- i) Tickets are provided by the ELM clearly indicating our licence information, dates of the draw, price of the tickets and licensed by the Gambling Commission, and GambleAware contact information
- j) A complaints process that is in place to deal with any issues in a clear and procedural way including Alternative Dispute Resolution if a complaint cannot be resolved by ClientEarth
- k) That any suspicious activity associated with the lottery is reported promptly to the Gambling Commission and if appropriate the police

Protecting the organisation from crime or disorder and preventing gambling from being a source of crime and disorder

ClientEarth will:

- refuse to be associated with any lottery or other gambling activity that may breach the law
- refuse to contract with any contractors or agents who we suspect may be associated with any potential or actual criminal activities
- only use an ELM who is licensed by the Gambling Commission, to run all or part of ClientEarth's lottery activities
- maintain ongoing monitoring of all staff, particularly with a view to their direct or indirect association with potential criminal activities
- ensure that it reports any actual or suspected criminal activities to the police
- conduct regular assessments of the risks to its business being used for money laundering and terrorist financing
- have an Anti-Money Laundering and Counter Terrorist Finance Policy

Preventing gambling from being a source of crime and disorder

When a player joins the lottery, the ELM will check that:

- a) The individual is aged 16 or over. Players need to provide their date of birth, need to have a bank account or other age verified payment methods.
- b) The individual is resident in Great Britain. Lottery tickets are dependent on the provision by a player of their valid GB postcode.

To prevent fraud and criminal activity, our ELM will:

- a) limits the number of subscription sold in one transaction to three;
- b) only pay prizes back to the account used to pay for the winning subscription or an account verified electronically in line with PPL's Prevention of Money Laundering and Terrorist Funding Policy;

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- c) ensure draws are adjudicated by an independent legal representative and completed on a secure, standalone and certified draw engine;
- d) offer no cash subscriptions; and,
- e) report suspicious activities to the Gambling Commission and to the Police, under the Proceeds of Crime Act 2002.

Ensuring children / vulnerable people are protected from being harmed or exploited by gambling

Underage gambling

ClientEarth will ensure that the ELM has internal controls in place that prevent an account being created if the date of birth provided would mean the individual is under 16 years of age.

ClientEarth will ensure that all lottery marketing and promotional materials, including any lottery tickets, advertise the minimum legal age limit and adhere to the advertisement rules laid out by the Committee of Advertising Practice, summarised below:

- To not encourage gambling that may lead to socially irresponsible acts or could lead to financial, social or emotional harm.
- To not exploit children or other vulnerable persons.
- To not suggest gambling can solve financial problems or debts.
- To not suggest gambling can increase attractiveness or sexual success.
- To not link gambling to youth culture or attempt to attract young persons to gamble.
- A customer care process that creates an alert when a player subscribes with more than six tickets.

Other vulnerable people

ClientEarth is committed to ensuring that lottery tickets are not knowingly sold to other vulnerable people. We will ensure that our ELM has a suitable Vulnerable Persons Policy regarding identifying, interacting and dealing with potentially vulnerable people.

Gambling limits

ClientEarth will impose limits on the number of tickets purchased by an individual in a single transaction. We will ensure that the ELM limits the number of tickets purchased by an individual in a single transaction to three and the total number of playing subscriptions to six.

Access to player history

Any player requesting a history of their lottery subscription (including payments and winning history) will be directed by ClientEarth to the ELM. The ELM will provide the information to the player.

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Self-excluders from gambling

Customers will be given the opportunity to self-exclude either by telephone or in writing and this information will be included on our public website.

ClientEarth will ensure that the ELM closes any customer/player accounts who has entered into a self-exclusion agreement and return any funds held in the customer/player account. The minimum self-exclusion period for non-remote gambling is of a duration of not less than six months and no more than 12 months. In terms of remote gambling the minimum self-exclusion period is six months up to five years. At the end of the period, the self-exclusion remains in place, unless the customer takes positive action in order to gamble again.

No marketing material will be sent to the individual unless the individual has taken positive action in order to gamble again, and has agreed to accept such material. Where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again, the customer will be given 24 days to cool off before being allowed to reactivate their play.

Marketing

ClientEarth will comply with the advertising codes of practice that apply to the form and media in which it advertises its lottery activities and will apply the principles included within these codes of practice for media not explicitly covered

On our public website we will provide information on gambling support organisations as well as our Complaints procedure and policies on Self-Exclusion.

Access to premises

ClientEarth will ensure that all employees and any ELM associated with ClientEarth's lottery activities are made aware that:

- a) they must co-operate with the Gambling Commission's enforcement officers in the proper performance of their compliance functions.
- b) the Gambling Commission's enforcement officers have rights of entry to premises, as contained in Part 15 of the Gambling Act 2005.

Reporting to Gambling Commission

ClientEarth will make all reasonable efforts to ensure that the Gambling Commission 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 a breach of a licence condition or a code provision having the effect of a licence condition.

ClientEarth will make all reasonable efforts to ensure that all key events as defined in the Gambling Commission's LCCP are reported to the Gambling Commission within five working days of the licensee becoming aware of the events occurrence.

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ClientEarth will maintain accurate accounting records in relation to all promoted lotteries.

ClientEarth will make available to the Gambling Commission such information as the commission may require in accordance with ClientEarth operating licences, the manner in which gambling authorised by the licence is provided and the manner in which the licensee's business in relation to that gambling is carried out, including in particular information about:

- a) accounting records in respect to all lotteries promoted by ClientEarth
- b) the number of staff associated with any lottery scheme where those changes have a material impact on ClientEarth's gambling activities
- c) the range of gambling activities provided by ClientEarth and the numbers of staff employed in connection with them.
- d) our policies in relation to and experiences of, problem gambling.

Complaints

ClientEarth will implement a Complaints Procedure which will be made available on the [ClientEarth public website](#) and to all potential or actual customers upon request.

ClientEarth will become a member of a suitable Alternative Dispute Resolution provider such as the Centre for Effective Dispute Resolution (CEDR).

Staff training

ClientEarth staff involved in its lotteries will be trained to a satisfactory standard to ensure compliance with this Policy. As a minimum requirement all Qualified Persons will undertake training on the following topics:

- AML & Counter Terrorist Financing
- Introduction to Gambling
- LCCP
- Player Protection and Corporate Social Responsibility.
- GDPR
- Regulating the Advertising of Gambling.

Training providers for the above topics will be recognised by the Gambling Commission.

Date of policy 26 August 2020