



# Responsible Gambling Policy

## EY Foundation

December 2023

### Amendment History

Version	Date of Amendments	Amendments	Main Author
December 2021	07.10.22	Change of title - Head of Income & Strategic Partnerships (p.6)	Kathryn Eastwood
December 2022	30.10.23	Change of title - Director of Fundraising (p.6)	Grace Brown

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## 1. Introduction

- 1.1. The EY Foundation helps young people facing barriers to entering the workplace and supports social entrepreneurs scale up sustainably. We aim to put young people at the heart of everything we do.
- 1.2. The purpose of this document is to ensure that any of our fundraising activity involving gambling is safe, legal and transparent in relation to the requirements of the Gambling Act 2005 (the Act) and Small Society Lotteries (Registration of Non-Commercial Societies) Regulations 2007.
- 1.3. This policy is in place to ensure that people take part in the EY Foundation's raffles and lotteries responsibly in accordance with the requirement of the Act.
- 1.4. All proceeds raised from lotteries are used for our charitable purposes.
- 1.5. As a holder of a Gambling Commission license, a key requirement of the Act is to have a responsible gambling policy to ensure:
  - Gambling is conducted in a fair and open way
  - We are protecting children under the age of 16 and other vulnerable persons from being harmed or exploited by irresponsible gambling
  - We are preventing gambling (e.g., The EY Foundation's lotteries and raffles) from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
- 1.6. Included within this policy is references and acknowledgment of the [EY Foundation Ethical Policy and Procedures](#), the NCVO Charity Ethical Principles 2019, the EY Foundation's Complaints [Policy](#) and the Fundraising Regulator's Code of Fundraising Practice. These policies together inform our processes and procedures for ensuring we approach gambling activities in a socially responsible way.

## 2. Our approach to responsible gambling

### 2.1. Ensuring that gambling is conducted in a fair and open way.

We will ensure that:

- supporters have access to clear information on matters such as the terms and conditions of the lottery or raffle including the prizes that are available and the chances of winning
- the rules are fair
- any advertising and promotional material is clear and not misleading
- the results are made public

### 2.2. Protecting children under the age of 16 and other vulnerable persons from being harmed or exploited by irresponsible gambling.

- The EY Foundation will not permit vulnerable people or any person under the age of 16 to participate in a lottery or any other form of gambling. Anyone under the age of 16 needs to be under the supervision of a natural person 16 years of age or older to enter a raffle. The EY Foundation has implemented the following procedures to ensure that its lotteries and raffles do not attract children under the age of 16: advertising the minimum legal age
- Request any entrant who appears to be under the age of 16 to produce appropriate proof of identity and age
- If an entrant is found to be less than 16 years of age, they will have any money paid in relation to the Lottery returned to them and where relevant will automatically forfeit the right to any prize.
- Careful attention is paid to the design and content of all marketing material to ensure it doesn't appeal to children under the age of 16

### 2.3. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

2.3.1. When an individual joins a lottery or raffle, we will:

- Check that the individual is aged 16 or over
- Check that the individual is resident in the UK

- Retain the right to cancel any membership should we suspect criminal activity
  - Limit the maximum number of entries to 10 or maximum spend of £100 - whichever is reached first - per entrant per draw.
- 2.3.2. We will also:
- Refuse to contract with any contractors or agents who are suspected of being associated with any potential or actual criminal activities
  - Require all suppliers to provide information about responsible gambling and access to information and help in respect of problem gambling to all relevant partners associated with The EY Foundation's lotteries and raffles.
  - Maintain records of all raffle tickets distributed and all tickets not returned.
  - Provide the Gambling Commission with any information which may relate to the commission of an offence under the Gambling Act.
- 2.3.3. Under the Proceeds of Crime Act 2002, all qualified persons, employees and self-employed agents have a legal obligation to report any known or suspected use of monies obtained illegally (the proceeds of crime) being used to gamble.
- 2.3.4. All reports will be held in the strictest of confidence and will be passed on to the National Crime Agency (NCA - which replaced the Serious Organised Crime Agency (SOCA) in October 2013) for further investigation, by The EY Foundation's Chief Financial Officer, via a Suspicious Activity Report (SAR\*), inclusive of an NCA issued Unique Reference Number (URN).

## 2.4. Problem Gambling

- 2.4.1. Whilst the majority of people do gamble within their means, for some gambling can become a problem. It may help you to keep control to remember the following:
- 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 need to talk to someone about problem gambling, then contact GamCare
- 2.4.2. The EY Foundation will endeavour to ensure that it identifies and reacts to any suspected problem gamblers.
- 2.4.3. If the EY Foundation receives an application to participate in its lottery or raffle from a suspected problem gambler:
- Any requests for any raffle tickets in excess of the recommended maximums (£100) will be refused
  - The supporter will be referred to [GamCare](#)
  - The supporter's details will be logged in the relevant lottery / raffle database and the EY database for the purposes of possible exclusion from future participation in future lottery / raffles
  - Future written and verbal communications should be monitored.
- 2.4.4. If an existing supporter was suspected of becoming a problem gambler:
- Any request for any additional entries will be refused
  - The supporter will be referred to GamCare
  - The supporter's details will be suppressed and will be excluded from future lottery participation and mailings
  - Future written and verbal communications should be monitored
  - The EY Foundation will ensure that any person who has asked to be suppressed from lottery or raffle mailings is not contacted by The EY Foundation for these purposes.
  - The supporter's details will be logged in the relevant lottery/raffle database and the EY Foundation database for the purpose of possible exclusion from further participation in future lottery / raffle.
  - Please note all proceeds received from lotteries are used for charitable purposes.

## 2.5. Self Exclusion from Gambling

- 2.5.1. If an existing supporter self-excludes from gambling:

- The EY Foundation will ensure to the best of their abilities and measures within their control, that any person who has asked to be self-excluded from gambling will be removed from any gambling related marketing databases of which the EY Foundation owns all rights to the data (this excludes databases owned by EY LLP), within two weeks of the EY Foundation receiving the completed self-exclusion notification and will be excluded for a minimum of six months, with the option of excluding for up to a maximum of five years.
  - All communication between staff and self-excluders or suspected problem gamblers will be recorded in writing and monitored and approved by the senior manager responsible for raffles.
- 2.5.2. If the EY Foundation receives an application to participate in the lottery or raffle from a person who has previously advised the EY Foundation that they have excluded themselves from participating in gambling:
- The application will be rejected and the prospective supporter will be advised in writing of the reasons for rejection and referred to GamCare
- 2.5.3. Any supporter that feels that they are developing a problem with gambling can ask us to suspend or close their User Account for a minimum period of six months (or any period requested by the User up to a maximum of five years). To apply a self-exclusion, please contact [fundraising@eyfoundation.ey.com](mailto:fundraising@eyfoundation.ey.com)

### 3. Complaints

All complaints relating to lotteries, raffles and gambling will be handled in accordance with [The EY Foundation's Complaints Policy](#) and we would encourage our staff, volunteers and supporters to use this policy should they wish to report any concerns about behaviour that breaches the standards in this policy.

All complaints will be reported to the Gambling Commission on an annual basis, via the Annual Regulatory Returns.

### 4. Financial requirements

All money received by The EY Foundation will be handled in accordance with The EY Foundation's finance and cash handling policies.

### 5. Marketing and Advertising

- 5.1. All advertising of gambling products and services will be undertaken in a socially responsible manner. The EY Foundation will comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) which apply to the form and media in which they advertise their gambling facilities or services. For media not explicitly covered, the EY Foundation will apply the principles included in these codes of practice as if they were explicitly covered. The EY Foundation will also follow any relevant industry code of practice on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.
- 5.2. The EY Foundation will research guidance that CAP and BCAP issues about advertising lotteries and raffles prior to undertaking advertising.
- 5.3. The EY Foundation will ensure that no-one who is or appears to be under 25 years old will be featured gambling.

### 6. Responsibilities and Compliance

- 6.1. The Board of Trustees is ultimately accountable for this policy.

- 6.2. The Audit and Risk Committee will consider any gambling matters that require consultation, for example when a due diligence assessment presents an ambiguous situation (see 4.6 above).
- 6.3. The Board of Trustees will only be involved in a final decision or oversight when a resolution cannot be found after consultation with the Audit and Risk Committee.
- 6.4. The Chief Executive is the member of the Leadership Team who is responsible for this policy on behalf of the Board.
- 6.5. The Leadership Team are responsible for ensuring that standards within this policy are implemented by embedding them in relevant decision-making procedures and processes in their directorates.
- 6.6. The Director of Fundraising is the policy lead and is responsible for developing and reviewing the policy; developing an organisational communications plan for the policy; and managing queries about the policy on a day-to-day basis.
- 6.7. The Director of Fundraising is responsible for maintaining a list of all major donors and funders, and of funding declined.
- 6.8. All of our Trustees and staff members at the EY Foundation are part of our wider fundraising efforts and responsible for acting in accordance with the policy.
- 6.9. We would encourage our people to use the [Whistleblowing and Complaints policy and procedure](#) should they wish to report any concerns about behaviour that breaches the standards in this policy.

## 7. Review and Maintenance

This policy was approved by the Board of Trustees in December 2022. It will be subject to an annual review process by the Audit & Risk Committee; it is next due to be reviewed by December 2023.

## 8. Appendix 1: Glossary of external sources of support

- 8.1. If you feel you have a problem with gambling, visit [www.begambleaware.org](http://www.begambleaware.org) or call the National Gambling Helpline on 0808 8020 133.
- 8.2. GamCare is a registered charity that provides confidential telephone support and counselling to anyone who is affected by problem gambling. GamCare can be contacted confidential helpline on 0845 6000 133 (local rate from UK) where trained counsellors are available to help with any concerns you may have on your own behalf or on behalf of family or friends or visit their website [www.gamcare.org.uk](http://www.gamcare.org.uk) for further information.
- 8.3. The EY Foundation is committed to ensuring that information about responsible gambling and accessing information and help in respect of problem gambling is readily available to all. The lottery and raffle rules and any marketing and promotional literature, including invitations to purchase tickets will, as far as is reasonably possible, advertise the Gamble Aware logo, the Gamble Aware website and the GamCare National Helpline number (0808 8020 133), with the following supporting text: *"If you feel you have a problem with gambling, visit [www.gambleaware.co.uk](http://www.gambleaware.co.uk) or call the GamCare National Helpline on 0808 8020 133."*