

Individual Decision



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The attached report will be taken as Individual Portfolio Member Decision on:

Thursday 25 October 2018

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Individual Executive Member Decision

Policies for Lottery License

Committee considering report:	Individual Executive Member Decision
Date ID to be signed:	25 October 2018
Portfolio Member:	Councillor Anthony Chadley
Date Portfolio Member agreed report:	13 September 2018
Forward Plan Ref:	ID3645

1. Purpose of the Report

- 1.1 To adopt the standard set of required policies for the Councils Gambling Commissioning Operators Licence required to deliver local lottery scheme in West Berkshire.

2. Recommendation(s)

- 2.1 The required policies are adopted.

3. Implications

- 3.1 **Financial:** None
- 3.2 **Policy:** The five required policies are attached as appendices.
- 3.3 **Personnel:** None
- 3.4 **Legal:** Risk of legal challenge without policies in place.
- 3.5 **Risk Management:** Policies are to set out the Council approach to managing any associated risks.
- 3.6 **Property:** None
- 3.7 **Other:** N/A

4. Consultation Responses

Members:

Leader of Council:

**Overview & Scrutiny
Management**

Commission Chairman:

Ward Members:

Opposition

Spokesperson:

Local Stakeholders:

Officers Consulted: Paul Anstey – Head of Public Protection
James Gore – Data Protection Officer

Trade Union:

5. Other options considered

5.1 N/A

6. Introduction/Background

6.1 The Council Executive agreed the proposal to establish a local lottery scheme in West Berkshire in July 2018.

6.2 This conditions of the licence requires the Council to have in place a standard set of policies to cover the following areas:

- (1) Fair and Open Gambling
- (2) Children and Vulnerable Persons Protection
- (3) Social Responsibility in Gambling
- (4) Protection from Source of Crime and Disorder
- (5) Implementation of Procedures

6.3 These policies are a standard suite provided to the Council as part of the Aylesbury Vale District Council Lottery Implementation Service which has been secured on the basis of their established track record of providing support to other Councils and a good success rate.

6.4 The lead Portfolio Member Councillor Anthony Chadley reviewed and agreed the policies with the support of the Head of Commissioning and the lead officer for Aylesbury Vale on 13th September 2018.

7. Supporting Information

7.1 Attached as appendices.

8. Options for Consideration

8.1 To adopt the policies as presented in the appendices of this report.

9. Proposal(s)

9.1 The policies are agreed and adopted.

10. Conclusion(s)

10.1 For the local lottery scheme to progress in West Berkshire five specific policies need to be in place to support the licence application. This will be achieved by the process of this Individual Decision to adopt the standard suite of policies provided as part of the support package the Council has purchased from Aylesbury Vale District Council.

Background Papers:

Subject to Call-In:

Yes: No:

The item is due to be referred to Council for final approval

Delays in implementation could have serious financial implications for the Council

Delays in implementation could compromise the Council's position

Considered or reviewed by Overview and Scrutiny Management Commission or associated Task Groups within preceding six months

Item is Urgent Key Decision

Report is to note only

Wards affected:

Strategic Aims and Priorities Supported:

The proposals will help achieve the following Council Strategy aim(s):

- BEC – Better educated communities**
- SLE – A stronger local economy**
- P&S – Protect and support those who need it**
- HQL – Maintain a high quality of life within our communities**
- MEC – Become an even more effective Council**

The proposals contained in this report will help to achieve the following Council Strategy priority(ies):

- BEC1 – Improve educational attainment**
- BEC2 – Close the educational attainment gap**
- SLE1 – Enable the completion of more affordable housing**
- SLE2 – Deliver or enable key infrastructure improvements in relation to roads, rail, flood prevention, regeneration and the digital economy**
- P&S1 – Good at safeguarding children and vulnerable adults**
- HQL1 – Support communities to do more to help themselves**
- MEC1 – Become an even more effective Council**

Officer details:

Name: June Graves
Job Title: Head of Commissioning
Tel No: 01635 519733
E-mail Address: june.graves@westberks.gov.uk

11. Executive Summary

- 11.1 The Council Executive agreed the proposal to establish a local lottery scheme in West Berkshire in July 2018.
- 11.2 These conditions of the licence requires the Council to have in place a standard set of policies to cover the following areas:
- (1) Fair and Open Gambling
 - (2) Children and Vulnerable Persons Protection
 - (3) Social Responsibility in Gambling
 - (4) Protection from Source of Crime and Disorder
 - (5) Implementation of Procedures
- 11.3 These policies are a standard suite provided to the Council as part of the Aylesbury Vale District Council Lottery Implementation Service which has been secured on the basis of their established track record of providing support to other Councils and a good success rate.
- 11.4 The lead Portfolio Member Councillor Anthony Chadley reviewed and agreed the policies with the support of the Head of Commissioning and the lead officer for Aylesbury Vale on 13th September 2018.

12. Conclusion

- 12.1 For the local lottery scheme to progress in West Berkshire five specific policies need to be in place to support the licence application. This will be achieved by the process of this Individual Decision to adopt the standard suite of policies provided as part of the support package the Council has purchased from Aylesbury Vale District Council.

13. Appendices

- 13.1 Appendix A – Data Protection Impact Assessment
- 13.2 Appendix B – Equalities Impact Assessment
- 13.3 Appendix C – Supporting Information
- 13.4 Appendix D – Fair and Open Gambling
- 13.5 Appendix E – Children and Vulnerable Persons Protection
- 13.6 Appendix F – Social Responsibility in Gambling
- 13.7 Appendix G – Protection from Source of Crime and Disorder
- 13.8 Appendix H – Implementation of Procedures

Appendix A

Data Protection Impact Assessment – Stage One

The General Data Protection Regulations require a Data Protection Impact Assessment (DPIA) for certain projects that have a significant impact on the rights of data subjects.

Should you require additional guidance in completing this assessment, please refer to the Information Management Officer via dp@westberks.gov.uk

Directorate:	Resources
Service:	Commissioning
Team:	Commissioning
Lead Officer:	June Graves
Title of Project/System:	Local Lottery
Date of Assessment:	3. 9.18

Do you need to do a Data Protection Impact Assessment (DPIA)?

	Yes	No
<p>Will you be processing SENSITIVE or “special category” personal data?</p> <p><i>Note – sensitive personal data is described as “data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation”</i></p>	<input type="checkbox"/>	x
<p>Will you be processing data on a large scale?</p> <p><i>Note – Large scale might apply to the number of individuals affected OR the volume of data you are processing OR both</i></p>	<input type="checkbox"/>	x
<p>Will your project or system have a “social media” dimension?</p> <p><i>Note – will it have an interactive element which allows users to communicate directly with one another?</i></p>	<input type="checkbox"/>	x
<p>Will any decisions be automated?</p> <p><i>Note – does your system or process involve circumstances where an individual’s input is “scored” or assessed without intervention/review/checking by a human being? Will there be any “profiling” of data subjects?</i></p>	<input type="checkbox"/>	x
<p>Will your project/system involve CCTV or monitoring of an area accessible to the public?</p>	<input type="checkbox"/>	x
<p>Will you be using the data you collect to match or cross-reference against another existing set of data?</p>	<input type="checkbox"/>	x
<p>Will you be using any novel, or technologically advanced systems or processes?</p> <p><i>Note – this could include biometrics, “internet of things” connectivity or anything that is currently not widely utilised</i></p>	<input type="checkbox"/>	x

If you answer “Yes” to any of the above, you will probably need to complete [Data Protection Impact Assessment - Stage Two](#). If you are unsure, please consult with the Information Management Officer before proceeding.

Equality Impact Assessment - Stage One

We need to ensure that our strategies, policies, functions and services, current and proposed have given due regard to equality and diversity as set out in the Public Sector Equality Duty (Section 149 of the Equality Act), which states:

- “(1) A public authority must, in the exercise of its functions, have due regard to the need to:**
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;**
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; this includes the need to:**
 - (i) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;**
 - (ii) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;**
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it, with due regard, in particular, to the need to be aware that compliance with the duties in this section may involve treating some persons more favourably than others.**
- (2) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.**
- (3) Compliance with the duties in this section may involve treating some persons more favourably than others.”**

The following list of questions may help to establish whether the decision is relevant to equality:

- Does the decision affect service users, employees or the wider community?
- (The relevance of a decision to equality depends not just on the number of those affected but on the significance of the impact on them)
- Is it likely to affect people with particular protected characteristics differently?
- Is it a major policy, or a major change to an existing policy, significantly affecting how functions are delivered?
- Will the decision have a significant impact on how other organisations operate in terms of equality?
- Does the decision relate to functions that engagement has identified as being important to people with particular protected characteristics?
- Does the decision relate to an area with known inequalities?
- Does the decision relate to any equality objectives that have been set by the council?

Please complete the following questions to determine whether a full Stage Two, Equality Impact Assessment is required.

What is the proposed decision that you are asking the Executive to make:	To approve the five policies required to progress the establishment of a Council Lottery Scheme in West Berkshire.
Summary of relevant legislation:	n/a
Does the proposed decision conflict with any of the Council's key strategy priorities?	No
Name of assessor:	June Graves
Date of assessment:	3 September 2018

Is this a:		Is this:	
Policy	Yes/No	New or proposed	Yes
Strategy	Yes/No	Already exists and is being reviewed	Yes/No
Function	Yes/No	Is changing	Yes/No
Service	Yes/		

1 What are the main aims, objectives and intended outcomes of the proposed decision and who is likely to benefit from it?	
Aims:	To generate more income for the Council
Objectives:	To approve required policies
Outcomes:	To provide a sound policy basis for the operation of the lottery scheme in West Berkshire.
Benefits:	To provide additional finances for the Council both directly and indirectly by supplementing statutory and non-statutory services already provided by WBC.

2 Note which groups may be affected by the proposed decision. Consider how they may be affected, whether it is positively or negatively and what sources of information have been used to determine this.		
(Please demonstrate consideration of all strands – Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex and Sexual Orientation.)		
Group Affected	What might be the effect?	Information to support this
Age	There is potential for	

	positive effect if and when the scheme is implemented	
Disability	There is potential for positive effect if and when the scheme is implemented	
Gender Reassignment		
Marriage and Civil Partnership		
Pregnancy and Maternity		
Race		
Religion or Belief		
Sex		
Sexual Orientation		
Further Comments relating to the item:		

3 Result	
Are there any aspects of the proposed decision, including how it is delivered or accessed, that could contribute to inequality?	/No
Please provide an explanation for your answer:	
Will the proposed decision have an adverse impact upon the lives of people, including employees and service users?	/No
Please provide an explanation for your answer:	

If your answers to question 2 have identified potential adverse impacts and you have answered 'yes' to either of the sections at question 3, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

If a Stage Two Equality Impact Assessment is required, before proceeding you should discuss the scope of the Assessment with service managers in your area. You will also need to refer to the [Equality Impact Assessment guidance and Stage Two template](#).

4 Identify next steps as appropriate:	
Stage Two required	No
Owner of Stage Two assessment:	

Timescale for Stage Two assessment:	
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Name: June Graves

Date: 3 September 2018

Please now forward this completed form to Rachel Craggs, Principal Policy Officer (Equality and Diversity) (rachel.craggs@westberks.gov.uk), for publication on the WBC website.

Policy Name	Fair and Open Gambling Policy	
Policy Purpose	Ensuring that gambling will be conducted in a fair and open way.	
Policy Created By		
Policy Created date	July 2018	
Policy Validated and Checked By		
Policy Validated and Checked Date		
Policy Renewal Date		


Policy Detail

1. West Berkshire Council are committed to complying with the Gambling Act 2005, The Gambling Commissions Licence Conditions and Code of Practice (LLCP), Lotteries Council Code of Conduct and The CAP and BCAP code, As a licensing body we are well aware of the requirements and regulate the same at the local level under our licensing powers.
2. West Berkshire Council utilise the services of Gatherwell Ltd who are an External lottery management company ensuring that the lottery is delivered on a financially sound basis as:-
 - 2.1. The financial structure of the lottery ensures that revenues are received prior to the running of any draw.
 - 2.2. Each draw is self funded in terms of the liabilities that then arise (prizes, good cause donations etc)
 - 2.3. No players' tickets will be included in the draw unless cleared funds have been secured.
 - 2.4. The prize fund and good cause donations are calculated on a % basis of the revenue pot therefore ensuring sufficient funds will always be in place.
 - 2.5. Jackpot prizes are funded through an underwritten insurance policy provided by a reputable underwriter established in the UK, again paid for as a % of each entry
3. All terms and conditions are available for participants on the various websites of the West Berkshire Council lottery, including the main www.westberkshirelottery.co.uk website.
 - 3.1. As part of the sign up process for new participants new participants are asked to agree acceptance of the terms and conditions at the time of signing up. New accounts cannot be created unless the terms and conditions are accepted.
 - 3.2. Participants will be advised of changes to the terms and conditions via pop ups on the website. In exceptional circumstances, all participants can be emailed a link to advise them of the new terms and conditions



4. Our terms and conditions detail the complaints procedure should participants need to raise any issues or concern, both internally at West Berkshire Council and externally through the use of an independent arbiter should resolution not be found.
5. No loyalty or reward schemes are being offered.
6. Section 257 of the Gambling act 2005 highlights that “A person acts as an external lottery manager for the purposes of this Act if he makes arrangements for a lottery on behalf of a society or authority of which he is not—
 - (a) a member,
 - (b) an officer, or
 - (c) an employee under a contract of employment.
 - 6.1. As such Gatherwell ask its board and staff to declare any conflict of interest in any potential target clients, in addition to the specific requirement to comply with the law as stated above for existing clients.
7. Gatherwell Ltd holds responsibility for ensuring that all technical solutions remain within scope of the law.
 - 7.1. These include testing procedures for both existing, upgraded and new software propositions
 - 7.2. Ensuring that all servers are located in the UK
 - 7.3. Software protocols and administrator access is limited to core personnel
 - 7.4. All Contractors and Third Party suppliers are advised of our standards before they are allowed to deliver technical support. Access is limited to the scope of their work and monitored and logged accordingly.



Policy Name	Children and Vulnerable Persons Protection Policy	
Policy Purpose	Ensuring that children and other vulnerable persons, will be protected from being harmed or exploited by gambling.	
Policy Created By		
Policy Created date	July 2018	
Policy Validated and Checked By		
Policy Validated and Checked Date		
Policy Renewal Date		

Policy Detail

1. West Berkshire Council understands its requirements as part of the Licence Conditions and Code of Practice (LCCP) 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. West Berkshire Council understands that there is a legal requirement to prevent the sale of lottery tickets to under 16s.
 - 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 West Berkshire Council have enabled their websites 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.


Policy Name	Social Responsibility in Gambling Policy	
Policy Purpose	Ensuring the promotion of social responsibility in gambling.	
Policy Created By		
Policy Created date	July 2018	
Policy Validated and Checked By		
Policy Validated and Checked Date		
Policy Renewal Date		

Policy Detail

1. West Berkshire Council is aware of its social responsibility to protect individuals from excessive and addictive gambling. As a licensing body and regulator we are well versed in these issues.
2. Limits are in place to ensure individuals cannot buy excessive numbers of tickets,
 - 2.1. This therefore restricts the capability for individuals to gamble beyond their means or gamble what they cannot afford.
 - 2.2. These limits will be monitored to see how many players reach them and may be reduced correspondingly if required.
 - 2.3. These limits are clearly highlighted at the point of purchase online.
3. Accounts require validation and set up.
 - 3.1. In the instances of direct debit the Direct Debit Guarantee ensures a time lag between ticket purchase and the first draw.
 - 3.2. As draws take place once per week, Ticket purchases are therefore not capable of being purchased for immediate play and
 - 3.3. 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.
 - 3.4. 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.
4. It is not possible to borrow money or be entered for lottery draws unless cleared funds have been accepted. No exceptions will be made to this position.
5. The system data provides facilities to track major changes in the lottery participation. Any significant outliers in the numbers of tickets will be investigated as part of ongoing assessments on the correct levels for ticket participation.

6. A process for self exclusion from lottery participation exists to allow anyone to self exclude themselves from all West Berkshire Council propositions (existing or future)
7. Links to the support websites (www.gamcare.org.uk & www.Gambleaware.co.uk) plus the National Gambling Helpline are made available on the website to direct anyone to help and support should they need help from gambling additions. West Berkshire Council will be a contributing member to their research and support through membership of the lotteries council.



Policy Name	Protection From Source of Crime & Disorder Policy	
Policy Purpose	Ensuring that West Berkshire District Council will be protected from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.	
Policy Created By		
Policy Created date	July 2018	
Policy Validated and Checked By		
Policy Validated and Checked Date		
Policy Renewal Date		

Policy Detail


1. This Policy is beholden to the Proceeds of Crime Act 2002 (see <http://www.legislation.gov.uk/ukpga/2002/29/contents>) & The Anti Money Laundering (AML) Regulations
 - 1.1. Proceeds of Crime Act 2002 : - *“An Act to establish the Assets Recovery Agency and make provision about the appointment of its Director and his functions (including Revenue functions), to provide for confiscation orders in relation to persons who benefit from criminal conduct and for restraint orders to prohibit dealing with property, to allow the recovery of property which is or represents property obtained through unlawful conduct or which is intended to be used in unlawful conduct, to make provision about money laundering, to make provision about investigations relating to benefit from criminal conduct or to property which is or represents property obtained through unlawful conduct or to money laundering, to make provision to give effect to overseas requests and orders made where property is found or believed to be obtained through criminal conduct, and for connected purposes.”*
 - 1.2. The AML Regulations require relevant businesses to:
 - *put in place procedures to verify the identity of customers on entering into a business relationship or transaction and to carry out ongoing monitoring during the business relationship*
 - *keep records obtained in establishing customers’ identities and of business relationships for five years*
 - *train employees in the relevant procedures and law*
 - *appoint a nominated officer whose role includes reporting to SOCA, or its successor, suspicions of money laundering activity*
 - *put in place and maintain policies and procedures to cover the requirements listed above*

2. West Berkshire Council is a professional operation and takes its responsibilities to ensure all players of their society lottery are operating within the law. We are also involved in numerous other Crime and Disorder related activities through our local authority role, and are regularly in contact with our local enforcement agencies. Likewise we are a license issuer and regulatory locally and are very familiar with these regulations.
3. West Berkshire Council employ the services of Gatherwell Ltd a Remote External Lottery Management company and therefore mainly take transactions electronically though either Direct Debit, credit card & debit card. No cash payments can be used for payment, mitigating the chance for the passing of counterfeit money.
4. A number of safeguards are in place to validate players' identities as part of the account verification process. Additionally safeguards are in place to ensure that ticket purchases are not excessive, therefore mitigating the risk of money laundering. If players tried to purchase excessive tickets then the system controls built into the software algorithms will advise the player that they have exceeded the number of tickets possible and stop the transaction.
5. The software resides on secure servers. These reside behind encrypted firewalls and offer bank level security protocols in the transfer of electronic data. Additionally they are situated in a secure data centre managed by Disclosure and Baring checked staff.
6. All transactions for the software will have full audit trails of every transaction made including timestamps. These audit trails will ensure that should any suspicious activity be identified a full investigation by Gatherwell Ltd staff or law enforcement bodies can be undertaken.
7. In an effort to minimise the risk of fraudulent behaviour and demonstrate impartiality throughout, the main Lottery draw each week takes the results from an independently drawn lottery (currently identified as the Australian Super 66). This ensures no fraudulent activity can be taken in the generation of the winning set of numbers for the draw, To ensure compliance at an entry level into the system, these numbers will need to be entered separately by two of the directors of the business each week. The smaller local level prizes are generated based on a random ticket selection from existing purchased tickets by an algorithm within the software.
8. Whilst by its definition a lottery is a random game of chance and therefore offers little opportunity for collusion or cheating, any suspicion of malpractice will result in the immediate blocking of the users account.
9. Any evidence of illegal behaviour by staff will initiate a full investigation, during which time the member of staff will be suspended from duties to ensure the full protection of the players, staff and reputation of the business.
10. All companies who provide fundamental services in the provision of the service (e.g Direct Debit Bureaus, Age Verification service providers, Prize fund insurance etc.) undergo rigorous

validation in terms of their suitability, credibility and reputation. This includes full financial health checks and references where required.



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Policy Name	Implementation of Procedures Policy	
Policy Purpose	The Process for Implementing West Berkshire District Council policies and procedures.	
Policy Created By		
Policy Created date	July 2018	
Policy Validated and Checked By		
Policy Validated and Checked Date		
Policy Renewal Date		

Policy Detail

1. West Berkshire Council takes its legal responsibilities very seriously and requires that Officers and staff are aware of their legal obligations in running a successful and legally compliant Lottery. As a local lottery license issuer and regulator we are well versed in the needs and requirements under such a license.
2. New Starters
 - 2.1. All new starters will be given training as part of the induction process. The level and depth is dependent on role but covers :
 - 2.1.1.The Gambling Act 2005
 - 2.1.2.LCCP
 - 2.1.3.CAP and BCAP
 - 2.1.4.Data Protection
 - 2.1.5.Plus the process for highlighting any evidence of non compliance
3. Existing Staff
 - 3.1. All officers connected to the lottery are aware of their legal responsibilities and compliance is a regular agenda item at review meetings.
 - 3.2. Annual refresher courses for staff will be run to maintain knowledge and compliance.
 - 3.3. Ad hoc on the job training forms part of the development of staff and focus areas for development are identified during the annual appraisal process and regular review process.
4. Umbrella Good Causes
 - 4.1. As part of our lottery scheme we will be enabling good causes to join under the West Berks Lottery itself.

- 4.2. All organisations will be provided with a fact sheet summarising their responsibilities covering the same items as set out in 2 above.
- 4.3. Annual training events will be run for the good causes addressing the same issues as set out in item 3 above.
5. Training records will be kept as part of the personnel record of individuals and a register of key training delivered and renewal dates kept.
6. Training will be delivered in conjunction with our ELM Gatherwell Ltd

