


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.

