

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	XXXXXXXXXX
Policy Created date	May 2018
Policy Validated and Checked By	XXXXXXXXXX
Policy Validated and Checked Date	May 2020
Policy Renewal Date	May 2021

## Policy Detail

1. NORTH HERTS DISTRICT COUNCIL understands its requirements as part of the LCCP and takes its responsibilities to the protection of children and vulnerable persons very seriously.
2. NORTH HERTS DISTRICT COUNCIL understand that there is a legal requirement to prevent the sale of lottery tickets to under 16's.
  - 2.1. All payers need to self-validate their age through both a positive tick box confirming they are over 16 and date of birth validation.
  - 2.2. To ensure compliance with this requirement, spot checks are taken of new players of the lotteries and are subjected to further age verification validation.
  - 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 and the minimum age requirement is also highlighted in the terms and conditions that the player signs up to at registration.
  - 3.2. In addition, NORTH HERTS DISTRICT 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 has 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 cause to help them market their lotteries
  - 5.3. To ensure compliance with the Advertising Codes of Practice and Gambling Industry Code for Socially Responsible Advertising, advertising materials will regularly be submitted to the Committee of Advertising Practice (CAP) and The Broadcast Committee of Advertising Practice (BCAP) 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.
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 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.

