***All WI members who may receive, distribute or sell tickets for the NFW National Annual Raffle should familiarise themselves with the following policies and practices and ensure that they are adhered to at all times***

****

The National Federation of Women’s Institutes

National Annual Raffle

###### Policies and procedures

Promoter for the sale of tickets within Great Britain (England, Scotland and Wales)

WI Enterprises Ltd

Registered under the Gambling Act 2005 with

The Gambling Commission

[www.gamblingcomission.gov.uk](http://www.gamblingcomission.gov.uk)

**May 2019**

WI Enterprises Ltd
104 New Kings Road
London
SW6 4LY

020 7371 9300

**WI Enterprises Ltd incorporated in England & Wales. Company No.1339906. VAT No.242785840**

**WI Enterprises Ltd is a subsidiary of the NFWI. Charity Registration No.803793. VAT No.239412857**

****

The official WI Enterprises Ltd (WIE) contact under the Licence is:

Mark Linacre

Group Manager

WI Enterprises Ltd

104 New King’s Road,

London SW6 4LY

The day to day administration of the National Federation of Women’s Institutes (NFWI) National Annual Raffle is handled by an External Lottery Manager (ELM). The ELM enforces strict measures of security with regard to sensitive data, money handling, property security, personnel, conducting of draws and storage.

The ELM acting on the NFWI/WIE’s behalf is:

CFP Lottery and Raffles Ltd

Suite 1

Beechwood

Grove Park

White Waltham

Maidenhead

Berkshire

SL6 3LW

The NFWI, WIE and ELM are committed to ensuring best practice under the terms of the License and the procedures and policies applying to the NFWI National Annual Raffle have been drawn up in consultation with the Gambling Commission.

*All WI members who may receive, distribute or sell tickets*

*for the NFW National Annual Raffle should familiarise themselves with*

*the following policies and practices and ensure that they are adhered to at all times*

****

Fair and open draw

policy and procedures

The following policy and procedures are in place to ensure that the NFWI/WIE operates a fair and open draw for the NFWI National Annual Raffle:

* The NFWI National Annual Raffle draw is conducted at the ELM’s premises in plain sight of staff and a WIE representative.
* The draw is conducted using either a random number generator or using a blind draw.
* Prize winners are announced at Autumn National Council and published in *WI Life*. Prize winner information is also available on request from WIE.
* Rules are published on the reverse of each raffle ticket.

* Printed versions of the Rules are available on request.
* A queries and complaints procedure is in place. *(see pages 11 - 13)*



### Protection of children and the vulnerable

policy and procedures

The following policy and procedures are in place to prevent under age players from participating in the NFWI National Annual Raffle:

* The minimum age for participants (currently 16 years of age) is detailed on the back of all NFWI National Raffle tickets.
* If a person appears to be less than the minimum age stated on the tickets, proof of age should be sought by way of photographic identification (passport/driving licence/student card).

*If age cannot be proven, sale should be refused.*

* Any participant who provides dishonest information regarding their age automatically forfeits the right to any prize. This ruling is also stated on the reverse of all tickets.
* Any participant that is found to be under 16 years of age will have any monies paid in relation to the raffle returned to them.
* In the event that a request to cease mailing raffle packs is received from a vulnerable person’s carer, their details will be removed from the raffle mailing database immediately.

****

### Responsible gambling and problem gambling

policy and procedures

The NFWI and WIE are committed to providing all reasonable assistance to those who find themselves having difficulties in controlling their gambling and have put in place the following procedures to encourage people to gamble responsibly and to seek help should gambling become a problem.

The following information is included on all raffle tickets and publicity materials:

*If you feel you have a problem with gambling, please visit* [www.gambleaware.co.uk](http://www.gambleaware.co.uk)

*for help and advice, or contact The National Gambling Helpline Freephone 0808 8020 133*

*(open 8.00 am to midnight daily).*

Participants can request self-exclusion from any database that is held for further raffle mailings. A member of WIE staff will be happy to discuss the preventative options and measures available. Similarly, if they believe the participant may have a problem, they will initiate the steps that will be taken, as follows:

* In the first instance, the participant will be provided with a Problem Gambling leaflet\* containing the Gambleaware details and self-exclusion may be advised.
* Should the participant then request to self-exclude, it will be explained that this is for a minimum period of six months. Any attempt to participate in the raffle will be denied during the six month period.
* The person requesting self-exclusion will be required to fill in a self-exclusion form, which will be supplied by WIE and which will then be stored in the Self-Exclusions folder in the office.
* The relevant WI Secretary and Federation will be notified of the self-exclusion.
* After six months, the self-excluded person is entitled to request their ability to participate in the raffle to be reinstated.
* The excluded person will not be allowed to gamble i.e. participate in the raffle for a further 24 hours, during which time they can reconsider their decision to recommence gambling.

\*The following information is included in the Problem Gambling leaflet:

The majority of people do gamble responsibly, but it may help you to keep your own gambling, or that of someone close to you, under control by remembering the following:

* *You’re buying fun, not investing your money.*
* *Before playing, set strict limits on how much time and money you’re going to spend.*
* *Quit while you’re ahead.*
* *Only gamble with money you can afford to lose.*
* *Don’t spend more money on gambling with the hope to win back money that you have lost.*
* *Keep up other interests and hobbies – don’t let gambling take over your life.*
* *Don’t gamble in order to escape from stress or boredom.*
* *Gambling in moderation is okay.*

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, relative or someone that you know) then the following questions may help to give 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?*
* *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?*

If you feel you are answering more ‘yes’ to the above questions, then it is likely a gambling problem exists.

**Sometimes just telling someone about your problem can be a relief -**

**and it is the first step towards dealing with your problem**

If you have concerns about yourself, or someone that you know, with regard to problem gambling,

for friendly and helpful advice from trained councillors please contact:

 **The National Gambling Helpline Freephone 0808 8020 133**

*Open 8.00 am to midnight daily*

 **Gamble Aware** [www.gambleaware.co.uk](http://www.gambleaware.co.uk)



Law and Disorder

policy and procedures

The following policy and procedures are in place:

* The NFWI/WIE will only conduct the National Annual Raffle (lottery) with a registered External Raffle (lottery) Manager (ELM).
* The ELM processes all entries and handles all monies received for the NFWI National Annual Raffle.
* All monies are paid in directly to the NFWI/WIE bank account.
* Banking reports are issued by the ELM on a weekly basis.
* The ELM operates from secure premises, with fire safes in situ and contractors such as G4S.
* The ELM keeps a record of all tickets that have been distributed.
* Information will be provided for any police checks of a raffle ticket seller that may be carried out.



Proceeds of crime

policy and procedures

*The Proceeds of Crime Act 2002* *(PoCA)* and *The Terrorism Act 2000* impose the duty and responsibility on all gambling operators to report where they know or suspect that a customer is using the proceeds of crime to gamble. This is one example of money laundering.

Key members of NFWI/WIE staff in senior positions have completed ‘Annex A’ forms for the Gambling Commission and have been Disclosure and Barring Service (DBS) checked. The NFWI/WIE are responsible for ensuring that everyone involved in receiving money for the NFWI National Annual Raffle understands what to look out for and what to do if they have suspicions.

The ELM takes its responsibilities to security arrangements in relation to raffle services very seriously, and has taken the necessary steps to ensure strict policies are in place to protect both their own staff and the NFWI/WIE as their clients.

All raffle monies are payable to NFWI/WIE and the ELM bank raffle money directly in to the NFWI/WIE account.

With regard to minimising the risk of external fraud (i.e. by the public), raffle tickets will only be mailed to named individuals over 16 years of age and a record of every ticket number, and to whom those numbers are issued to, is held by the ELM.

All new members of the ELM’s staff are DBS checked and cleared by Agenda Resource. Full training is provided in relation to the Gambling Commission, and the ELM’s responsibilities under the LCCP.

If the NFWI/WIE or any of its employees or members handles the proceeds of crime, this may constitute an offence under PoCA. The National Crime Agency (NCA) is responsible for dealing with financial information regarding the suspected proceeds of crime. Their website can be found at [www.nationalcrimeagency.gov.uk](http://www.nationalcrimeagency.gov.uk)

Proceeds of crime

policy and procedures *(cont)*

Whilst it is felt that the activities involved with the NFWI National Annual Raffle may be low risk in this context, the following process must be adhered to, to enable any reasonable suspicions to be reported to the National Crime Agency (NCA).

* If you know or suspect someone of using money they obtained illegally (the proceeds of crime) to participate in the NFWI National Raffle, you have a legal duty to report this immediately to:

**Mark Linacre, Group Manager, WI Enterprises Ltd, 104 New King’s Road, London SW6 4LY.**

If you do not you will be seen as helping money launderers and could be prosecuted.

* Where funds are known or suspected to be of criminal origin a suspicious activity report (SAR) must be made to the NCA.
* As mentioned above, if the NFWI/WIE or any of its employees or members handles the proceeds of crime, this may constitute an offence under PoCA. However, there may be a defence if a report is made by the NFWI/WIE to the NCA and a request is made for ‘appropriate consent’ This can be done at the time suspicious activity is reported by ticking the ‘consent required’ option on the SAR form.



Initial queries and complaints

policy and procedures

The NFWI, WIE and ELM recognise there may be times when problems may be encountered during the course of the raffle. The following procedures have been designed so that any difficulty can be resolved quickly.

Initial telephone queries and complaints

* Initial queries and complaints will be dealt with over the telephone by the advisers in the ELM’s telephone room. *(see pages 13 and 14)*
* A telephone log sheet will be completed at the time of the call, detailing the caller’s contact details, details of the telephone adviser who took the call, nature of the complaint and how the complaint was resolved.
* The telephone log sheets will be kept on file for 3 years by the ELM.
* If an initial complaint cannot be resolved, the complaint will be logged by the ELM and WIE will be notified immediately of the issue in order for it to be resolved.
* All general queries will be logged on the log sheets by the ELM and held for future reference.

**Initial written complaints**

* Initial complaints and queries will be responded to within in 48 hours of the complaint being received by the ELM’s administration team.
* All complaints will be logged on the complaints log sheet, detailing the individuals contact details, the nature of the complaint, details of the administrator who has dealt with the complaint, and what steps were taken to resolve the complaint.

Initial queries and complaints

policy and procedures *(cont)*

* The complaints log sheets and written complaints will be kept on file by the ELM for three years.
* If the initial complaint cannot be resolved by the ELM, the complaint will be logged and forwarded immediately to WIE to be resolved.
* All general queries will be logged on the log sheets by the ELM and held for future reference.
* Only the Group Manager of WI Enterprises Ltd or the NFWI Board of Trustees has the authority to agree a resolution, when the formal complaints procedure has been instigated.
* Should the above fail to bring a satisfactory conclusion to the matter, the dispute will be referred to the Alternative Dispute Resolution service (ADR entity).
* The NFWI/WIE has access to the Alternative Dispute Resolution services of theIndependent Betting Adjudication Service(IBAS) through the ELM.
* The ADR entity (IBAS) will acknowledge receipt of the written complaint within 21 days of receipt and carry out a thorough review and investigation into all circumstances and evidence relating to the dispute and make an independent assessment on its merit.

The NFWI/WIE is not legally bound to abide by the ADR entity (IBAS) decision, although it would normally do so, other than in exceptional circumstances.

****

Complaints dispute resolution

policy and procedures

It is a requirement of the Gambling Act 2005, that all gaming must be conducted fairly and openly. In order to comply with this licensing objective, the NFWI, WIE and ELM endeavour to settle all complaints and disputes through the complaints procedure outlined below:

* In the first instance *(see page 11)*, all complaints with regard to the NFWI National Annual Raffle must be raised with the ELM at the time. They will endeavour to settle all complaints in a fair and consistent manner, within the best interests of all parties.

*It is only in situations where an informal discussion of a complaint or problem has been tried, and has failed to bring about a satisfactory solution, that a more formal complaints procedure should be used.*

* If you are not satisfied with the initial response you receive, please put your complaint or problem in writing to:

**Mark Linacre, Group Manager, WI Enterprises Ltd, 104 New King’s Road, London SW6 4LY**

 who will then try to bring the matter to a satisfactory conclusion.

* The Group Manager of WI Enterprises Ltd will send an acknowledgement in writing of the complaint within 48 hours of receipt, and begin an investigation.
* Every effort will be made to complete this investigation within seven days of receipt. The Group Manager of WI Enterprises Ltd will then contact you with the findings, recommendations and proposed actions.
* In the unlikely event of an agreement not being reached between the Group Manager of WI Enterprises Ltd and yourself, your complaint will be forwarded to the Board of Trustees for their intervention.

****

Rules governing the NFWI National Annual Raffle

* No ticket to be sold by or to anyone under 16 years of age.
* Any person found to be under 16 years of age automatically forfeits the right to any prize.
* Tickets must not be sold to or by anyone on a street.
* Trustees, Directors and employees of the National Federation of Women’s Institutes are not permitted to purchase tickets.
* Late entries will be transferred to the next NFWI National Annual Raffle
* Please return any unsold tickets.
* Winners will be notified in writing.
* No cash alternatives will be offered.
* The winner’s photograph may be required for future publications.
* No acknowledgements will be issued.
* All monies raised will be used to fund national and federation work in England and Wales.
* If you have a complaint, please call the ELM on 01628 511706.

**These Rules are printed on the reverse of each Raffle ticket**

**WI Enterprises Ltd 104 New Kings Road London SW6 4LY**

**020 7371 9300**

**WI Enterprises Ltd incorporated in England & Wales. Company No.1339906. VAT No.242785840**

**WI Enterprises Ltd is a subsidiary of the NFWI. Charity Registration No.803793. VAT No.239412857**