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| 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 | Hannah Baynham |
| Policy Created date | April 2020 |
| Policy Validated and Checked By | Tracey Wood |
| Policy Validated and Checked Date | May 2022 |
| Policy Renewal Date | Apr 2023 |

## Policy Detail

1. East Hampshire 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. East Hampshire District Council understand that there is a legal requirement to prevent the sale of lottery tickets to under 16’s.
   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. To ensure compliance with this requirement, spot checks are taken of new players of the lotteries and are subjected to further Age Verification validation
   3. As a final check before any jackpot prizes are issued, secondary age validation is also sought (passport, driving licence etc)

To ensure players are aware of the age limitations,

* 1. clear statements will be displayed on the various websites and literature 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
  2. In addition East Hampshire 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.

1. 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.
2. All advertising materials will:
   1. Not include imagery of children
   2. Not use imagery that appeals to children
   3. Not use messages or language that appeals to children
   4. Not encourage ‘pester’ power
3. Marketing falls into two areas:-
   1. Firstly in encouraging good cause participation (where there is a low risk of exposure to children and vulnerable people) and
   2. Secondly in the development of materials that support participation of the individual lotteries.
      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
   3. As part of our commitment to our social responsibilities, East Hampshire District Council are committed to ensuring compliance with the Advertising Codes of Practice 2010 and subsequent changes through regular referrals to the CAP policy and newsletter subscriptions advising of changes in legislation and guidance.
4. As recruitment is undertaken to fill vacancies, if exposed to the direct selling of tickets then
   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.
5. Accounts require validation and set up.
   1. In the instances of direct debit; the Direct Debit Guarantee ensures a time lag between ticket purchase and the first draw.
   2. As draws take place once per week, Ticket purchases are therefore not capable of being purchased for immediate play and
   3. for internal process reasons even credit & debit card payments cannot facilitate instant play into a draw and a minimum of one days lag will be effective.
   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.