

Vulnerable Persons Policy (Lottery)

Ellen MacArthur Foundation ('EMF', 'our', 'we') and our External Lottery Manager, Postcode Lottery Limited trading as People's Postcode Lottery ('PPL'), are committed to ensuring that our lottery is operated in a fair and open way as a socially responsible operator. We and PPL aim to achieve best practice in protecting children and other vulnerable persons from being harmed or exploited by gambling. PPL, in operating our lottery, will:

- take all reasonable steps to treat a customer fairly, enabling them to make an informed decision about subscribing to it, including taking into account the needs of anyone who may be vulnerable or require additional care and support in order to allow them to make an informed decision;
- not exploit the credulity, lack of knowledge, apparent need for care and support or vulnerable circumstance of any customer, or potential customer, at any time;
- not sign up a player if it is known, or there are reasonable grounds for believing, that an individual lacks capacity to make a decision to play;
- not unreasonably intrude into a person's privacy;
- not make contact in an unreasonably persistent manner nor place pressure on any person to play.

1. IDENTIFYING VULNERABLE PEOPLE

We believe that everyone who is eligible should have the opportunity to play if they wish to do so. It is important not to discriminate by treating certain groups or individuals differently based on a personal characteristic such as disability or age. However, we recognise that there are circumstances in which a player should not be signed up, or retained, or where extra care may be needed by way of interaction and monitoring. For further details of how PPL protects children and young persons' reference should be made to our Social Responsibility Policy.

We understand it may be difficult for PPL's Customer Experience ('CE') representatives to make a clear decision as to whether someone is in vulnerable circumstances, lacks capacity or requires additional care. In these circumstances PPL ask the CE representatives to exercise judgement. If in doubt, they seek guidance from a senior member of the CE team and ultimately err on the side of caution and protect the individual. To assist the CE representatives, PPL have set out broad indicators which could help identify vulnerability and help the CE representatives to act responsibly.

2. VULNERABLE CIRCUMSTANCES

A person would be considered vulnerable if at the time of interaction, for a temporary, fluctuating or permanent reason, they:

- Are not in a position to independently decide what is in their best interests; or
- Need additional support to help them decide on a course of action; or
- Have, or have previously had, a concern about their gambling or are a self-confessed problem gambler; or
- Display a potential inability to be able to afford to play.

Potential causes of this vulnerability could include:

- Mental health issues including stress and anxiety;
- Gambling addiction;
- Alcohol and drug misuse;
- Factors associated with ageing;

- Language difficulties or problems with reading and writing;
- Illness;
- Financial difficulties;
- Being under the age of 16 years.

3. **SIGNS AND INDICATORS**

The signs of vulnerability are many and varied, however there are indicators which should alert the CE representatives to the possibility that an individual is vulnerable. Although it is not feasible to provide a comprehensive set of factors or characteristics which would enable the CE representatives to always identify a vulnerable individual, they should be aware of the following indicators:

- Asking irrelevant or unrelated questions or responding in an irrational way to questions;
- Saying 'yes' or 'no' at times when it is clear they have not understood the meaning of what is being discussed;
- Saying 'I don't usually do things like this, my husband/wife/son/daughter takes care of it for me';
- Having trouble remembering important information, for example forgetting that they are already a player, or have previously been a player;
- Saying 'I really need a win' or 'I haven't been able to pay my bills for a few months';
- Repeated and numerous contact asking the same or similar questions; or
- Erratic payments or frequent cancelling and restarting of subscriptions.

When assessing whether a person has the ability to play, PPL consider whether they have the capacity to do so. The Mental Capacity Act 2005 states that a person is unable to make their own decision if they cannot do one or more of the following **four** things:

- understand information given to them;
- retain that information long enough to be able to make the decision;
- weigh up the information available to make the decision;
- communicate their decision.

When PPL have assessed that there are reasonable indicators that an individual should not play the lottery, the CE representatives have the right to refuse and terminate service, where appropriate. In such cases, cancellation letters are sent to those terminated due to vulnerability. If there is immediate concern over an individuals' personal safety or the safety of others, this is escalated immediately to a senior member of the CE team, and where appropriate local authorities are informed.

In cases where the relevant indicators raise some concerns, but the assessment is that it appears appropriate for the individual to remain a player, a PPL Team Leader will call the player and advise that contact will be maintained by telephone every 3 months, provided the player gives consent.

Any communication with a vulnerable person is marked accordingly and where an account exists or has been created, a detailed note is left on the individuals' account, including call content and the actions taken. In addition PPL's Data Insights Team identify individuals that attempt to sign up but should not be allowed to play, eg the person is self-excluded or has been blocked due to duty of care, and will alert the CE team to remove them from the draw and contact them. In addition, monthly statistics are analysed to identify any trends which suggest areas for concern. These include potential indicators, such as:

- Increases in subscription;
- Fluctuations in payments or numbers of subscriptions;
- Self-excluded numbers, including newly self-excluded and those choosing to return to gambling;
- Players added to vulnerable persons tracker;
- Players blocked under duty of care.

4. CHILDREN UNDER THE AGE OF 16 YEARS

Before an individual can join our lottery they must confirm that they are over 16 years of age, and provide their date of birth. In addition PPL's internal controls prevent an account being created if the date of birth provided would mean the individual is under age 16. We and PPL adhere to advertising rules laid out by the Committee of Advertising Practice and Broadcasting Committee of Advertising Practice to prevent the exploitation of children or other vulnerable persons and do not link gambling to youth culture or attempt to attract young persons to gamble. PPL has contracted with external companies to undertake age checks aimed at ensuring personalised marketing is not sent to anyone under age 16. All advertising carries a 16+ logo and our Terms and Conditions provide that only people over age 16 may participate, and that prizes will not be paid to anyone found to be under 16 years old.

PPL also completes random checks of individuals who self-verify their age by conducting monthly dip-sampling of at least 1,000 records. If PPL becomes aware of a subscription created by an individual who is under the age of 16 years, the account will be stopped and blocked immediately. If PPL has a suspicion an individual is under age 16, any subscription held by them will be stopped and blocked, until such time as their age has been verified through a reliable source, such as the provision of photographic ID.

5. TRAINING AND MONITORING

PPL delivers induction training to customer facing staff in identifying vulnerable persons, and annual compliance training to all its staff. PPL also works with supported charities and other organisations, such as GamCare to develop knowledge and awareness of key indicators.