

AAPL Self Exclusion Policy

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1. About AAPL

Kent, Surrey & Sussex Air Ambulance Trust (KSS) is a UK registered company and charity providing an air ambulance service in the south east of England. It is funded almost entirely from donations and fundraising in the local community. It wholly owns a subsidiary (AAPL) that is licenced by the Gambling Commission to promote and operate Lotteries and Raffles to raise funds for the charity. The taxable profits are gift aided to the charity on an annual basis.

2. Purpose

AAPL is committed to being a people centred organisation. Though a lottery can be a fun way of interacting with supporters and raising funds, for some people gambling can have negative consequences. AAPL is committed to raising the awareness of responsible gambling and the prevention of gambling problems.

One way this can be achieved is through supporting AAPL supporters through a period of self-exclusion when needed and ensuring they are signposted to the appropriate sources of help.

3. Context

Entering into self-exclusion is a significant step and AAPL & KSS Staff will do what they can to ensure any supporters requesting self-exclusion fully understands what it means and are signposted to additional support to help with any potential gambling problem.

Self-exclusion is a commitment not to attempt to gamble for a minimum period of six months. Generally speaking, the gambling commission consider this to be the length of self-exclusion necessary to enable an individual to deal with their problem gambling behaviour.

A supporter who has taken the step of self-exclusion should be able to do so immediately and not be required to wait. They should be offered the opportunity to speak to someone appropriate about self-exclusion as soon as possible.

4. Audience

This policy applies to all AAPL and KSS staff, volunteers and contractors.

5. Principles

It is a breach of social responsibility codes if you are unable to demonstrate that all reasonable steps have been taken to prevent marketing materials from being sent to self-excluded supporters.

LCCP Social responsibility code states “You must take steps to remove the name and details of a self-excluded individual from any marketing databases used by your company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.

It also states “You must take responsibility for third parties with whom you contract from the provision of any aspect of your business related to the licensed activity. Where you have a relationship with a third party which sends marketing materials to your customers, you must take all reasonable steps to ensure they do not send material to those who have self-excluded.

6. Definitions

This section outlines key terms which are used within the policy to aid understanding.

LCCP Social Responsibility code	The code by which all license holders must adhere.

7. Policy Effect

7.1 Self-exclusion Form

AAPL will provide a clear and user-friendly system for supporters to be able to self-exclude and will ensure we support them in their decision. It will be made available online and via standard post & email to aid accessibility and our materials also contain contact numbers should a supporter wish to call.

7.2 Further support

A supporter who has chosen to self-exclude will be contacted to ensure they are fully aware what self-exclusion is and to ensure they are given the details of how to contact begambleaware and the Gambling Helpline. Staff will also direct them to the gamblock software, which can be used to prevent an individual from accessing gambling internet sites.

7.3 Timeframe

The minimum time period for self-exclusion will be 6 months, with the maximum period being set at 12 months and AAPL will give the supporter the option of which they wish to self-exclude for.

The supporter’s lottery account will be closed for the period of the self-exclusion. During the period of self-exclusion, the supporter will in no way be entered into any AAPL lottery.

7.4 Marketing Materials

AAPL will take all reasonable steps to refuse service, or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling with AAPL. A request for self-exclusion will be effective immediately with no cooling off period.

AAPL will take all reasonable steps to prevent any marketing material being sent to the individual. AAPL will flag the record of any self-excluded person on the marketing database as an individual to whom marketing material must not be sent, within 2 working days of having received the completed self-exclusion notification.

The self-exclusion request will be entered onto the lottery software system and will block any further requests from the individual to partake in gambling by using the following fields of data: forenames, surname, address and postcode and telephone number.

AAPL will ensure the supporter's details are not passed to any third party who may be marketing on our behalf once the self-exclusion notification has been received.

7.5 Account balances

Any balances on the account paid in advance of future draws will be refunded. If the supporter is paying for their membership by Standing Order payment, they will be advised to contact their bank immediately.

7.6 Returning to the Lottery

AAPL recognises the period of time following a self-exclusion period may be a particularly vulnerable one. The supporter must take positive action to gamble again and no contact will be made by AAPL until contact has been made by that individual.

Once the self-exclusion period expires, if the supporter wishes to recommence participating in one of the lotteries, they must request in writing that they wish to be removed from the self-exclusion register. Once AAPL receive this letter the supporter will be given one day to cool off before being given the opportunity to recommence participation.

7.7 Reporting Key Events

AAPL acknowledge that the gambling commission view sending marketing materials to self-excluded supporters as a key event that would need to be reported.

Should AAPL be made aware that marketing material has been sent, the KSS Director of Individual Giving must be informed immediately, who will liaise with the Executive Director of Income Generation, Communications & Marketing and the Head of Governance & Compliance to ensure the correct report is completed.

If the direct marketing is via email, this is also in breach of the Privacy & Electronic Communications (PECR) regulations and is reportable to the ICO.

8. Monitoring, Compliance and Deviation

This policy fulfils the responsibilities of KSS and AAPL and as such, there should be no deviation from it.

9. Roles and Responsibilities

The table below should be completed.

Group/Individual	Responsibilities
Director of Individual Giving	To ensure all staff within the department are aware and actively using this policy and any third-party contractors are aware of their responsibilities and reporting requirements.

10. Equality Analysis

This Policy has been assessed for its impact upon equality.

KSS is committed to ensuring that the way that we provide services and the way we recruit and treat staff reflects individual needs, promotes equality, and does not discriminate unfairly against any particular individual or group.

11.Implementation

This section should briefly outline what actions will be taken to ensure the policy is effectively implemented across KSS, including among staff, stakeholders, and contractors (if relevant) based on the table below.

	Details or Yes/No	Status (in progress/completed/overdue) including date	Individual Responsible
Reference to policy in dispatch	Yes, as part of the wider update on AAPL lottery policies		
Whether briefing note for staff, volunteers or other stakeholders required	No, part of training of new Lottery staff only		
Whether briefing or training sessions for staff/volunteers required	Lottery staff only		
Whether need to refresh awareness/refer to policy on 6 monthly bases through staff meetings	Yes		
Whether policy included in induction training	Departmental induction, relevant to role		
Whether document to be published on KSS website/intranet	Not required		
Whether process agreed for monitoring and compliance	Director of Individual Giving to monitor.		
Whether a public facing version is required	No		
When the policy register updated			

12.Consultation and Review Process

KSS Executive Director of Income Generation, Marketing & Communications has signed off this policy and it has been circulated to all AAPL Directors.

13.References and Associated Documentation

Lottery marketing & advertising SOP.

14. Further Guidance

Further guidance can be found on the [gambling commission](#) website.

Appendix Glossary of Terms

KSS	KSS is the preferred name of Kent Surrey Sussex Air Ambulance Trust
AAPL	Air Ambulance Promotions Limited

The KSS Way	The KSS Way refers to the strategic infrastructure of the organisation and should be written as 'The KSS Way'
Staff	KSS employees are referred to as staff. The following description of staff should be included in the definitions section 'Staff refers to any individual who works for KSS in any capacity including Emeritus staff and those working on a full-time, part-time, temporary, secondment, or line share basis'.
KSS Structure	The KSS structure is as follows Directorates Income Generation, Service Delivery, Marketing and Communications, Corporate Services Department: Each Directorate comprises of departments Function: Each Department comprises of functions