

Annex 2

Customer Impact Screen

Topic	Local Authority Lottery
For decision by (name and date)	Cabinet – 27 th April 2017
Date of screening assessment	January 2017
Author	Helen Efemini



Introduction to the proposal and background	<p>The establishment of a local lottery is a concept being explored by a number of local authorities across the country. At a time when there are increasing pressures on resources, lotteries are seen as a way of providing supplementary funding.</p> <p>Thanet District Council (TDC) is committed to continuing to support the local voluntary and community sector and with the establishment of a “Good Causes Lottery “ will seek to maximise benefits to the community, deliver the proceeds locally, have local lottery winners, minimise operational costs, and help raise awareness of the value and importance of local good causes.</p> <p>A lottery is a form of gambling and is run within the framework set out by the Gambling Commission and Gambling Act 2005 . Under the licensing objectives set out in the Gambling Act, operators are required to ensure they protect children and other vulnerable persons from being harmed or exploited by gambling. Any form of gambling has some risk to the residents of Thanet , however it is regarded as one of the lowest forms of risk to the protected groups identified within this assessment.</p>
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	Negative Impact		Benefits		Evidence
	Yes	No	Yes	No	
protected characteristics					
Age	✓		✓		The lottery, being an age restricted practice will need careful marketing and protective measures to ensure those under 16 cannot purchase a ticket. 'Good Cause' groups that benefit could include those that provide services or deliver projects that benefit different age groups. Enforcing the policies and procedures required by the Act 2005 for a licenced Operator will mean mitigation has been put in place to reduce the impact.
Gender (Sex)		✓	✓		'Good cause' groups that benefit could include those that provide services or deliver projects that benefit different gender groups.
Disability	✓		✓		The council is mindful of issues such as gambling addiction, this will be explored in greater detail in the full assessment. 'Good cause' groups that benefit could include those that provide services or deliver projects that benefit disability groups.
Race		✓	✓		'Good cause' groups that benefit could include those that provide services or deliver projects that bring communities together.
Sexual Orientation		✓	✓		'Good cause' groups that benefit could include those that provide services or deliver projects in this area.
Gender Reassignment		✓	✓		'Good cause' groups that benefit could include those that provide services or deliver projects in this area.
Pregnancy & Maternity		✓	✓		'Good cause' groups that benefit could include those that provide services or deliver projects in this area.
Religion & Belief		✓		✓	Religious, political and faith groups are not expected to be listed as a 'good cause' , this is to maintain the council impartiality . Some religions do not permit gambling.
Marriage & Civil Partnership		✓		✓	Not considered applicable to this analysis.
Socio-economic/ social inclusion		✓	✓		'Good cause' groups that benefit could include those that provide services or deliver projects in this area. The lottery is expected to increase activity to bring together community/groups and further the aims of the council to promote activities that improve the wellbeing of residents. There will be social economic benefits which will only be determined once the Good Causes are known. This area will continue to be considered and monitored throughout the life of the Lottery.
Final recommendation arising from the screening process.					To explore age and disability issues in greater detail as part of a full analysis. To consider how 'good causes' who will benefit and can help the council discharge its equality duties through their work funded by this lottery , this will be addressed once the Good Causes are known.

Customer Impact Assessment

Topic	TDC Lottery
For decision by (name and date)	Cabinet – 27 th April 2017
Date of this assessment	March 2017
Author	Helen Efemini
Assessment Team	Helen Efemini and Claire Grant

Detailed analysis

Issue 1	Preventing under-age participation and protecting vulnerable groups
Stakeholders/interested parties	<p>Internal stakeholders: Information Governance and Equality Officer, Communications, Legal, Licensing, CMT, Finance, Members and Personal Licence holder.</p> <p>External stakeholders: Other Local authorities in Kent and neighbouring counties, Gambling Commission http://www.gamblingcommission.gov.uk , approved 'good causes' who offer services or deliver projects to under 16's, External lottery Manager and residents.</p>

Consultation & Engagement	<p>All communications to residents and good causes will emphasise the strict age limits associated with taking part in a lottery and the importance of only taking part if you are able to afford the ticket.</p> <p>The Lottery will work with ‘good causes’ especially those who provide and deliver services/ projects to under 16s, to ensure that their marketing is aimed at parents, family members and friends over the age of 16. The lottery administration will continue to look closely at this issue during the life of the project.</p>
Data sources and evidence	<p>http://www.gamblingcommission.gov.uk/PDF/survey-data/Young-people-and-gambling-2016.pdf</p> <p>Subject Specific Legislation –Gambling Act 2005 section 24 and 82(1), the operating licence must comply with social responsibility code provision 3.2.13(Licence Conditions and Code of Practice (LCCP))</p> <p>Gambling Act 2005 section 83(1), which covers the returning of lottery ticket money if received from a child. When a licensee becomes aware that a child has taken part in the lottery it must return any money paid by the child as soon as is reasonably practicable. It also states that no prize can be given to the child.</p> <p>Any other relevant data – As part of the social responsibility code provisions, of the licence, (section 3) requires policies & procedures designed to prevent underage gambling, and to regularly monitor effectiveness. Compliance with the code is a condition of the operating licence. A breach of these will lead the Gambling Commission to review the Operator’s licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the Operator to the risk of prosecution</p>

Protected Characteristic(s) affected	The focus for this issue is the protected characteristic of age (under age gambling)
Impacts Identified	Mitigating the potential for underage participation and protecting vulnerable groups.
Mitigation options, reasonable adjustments and potential solutions	<ol style="list-style-type: none"> 1. The types of policies and procedures to reduce the risk of participation will cover ; <ol style="list-style-type: none"> a) Warning Potential customers that underage gambling is an offence; b) Requiring customers to affirm that they are of legal age; c) Regularly reviewing age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves; d) Ensuring that relevant staff are properly trained in the use of age verification procedures ; in particular the ELM staff trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of a legal age; e) Enabling the Good Causes Lottery website to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of the site; f) Conduct random checks of users who have self-verify for compliance with age restrictions; g) Verifying additional information about the customer , such as carrying out searches of credit reference and other databases that list names and addresses of individuals over the age of 16 ; h) Gambling management tools and responsible gambling information i) Employment of children and young persons (16 and 17 years) – are made aware that the law prohibits underage gambling , and that lottery tickets may only be sold to persons aged 16 or over. j) Identification of individual customers – identifying separate accounts which are held by the same individual k) The use of credit cards – accept only when made by a customer account, 2. Carefully planned and targeted communications , working with partners to draw attention to parental responsibility as part of purchasing a lottery ticket when using a mobile phone and interactive television 3. Working closely with approved ‘good causes’ to help ensure that the targeting of their marketing is responsible and aimed at those over the age of 16 years. This will form part of the criteria for acceptance to be a Good Cause and will be monitored and managed by the ELM 4. Protection of under 16s criteria will form part of the specification for the tender process of the External Lottery Manager (ELM).

	<p>5. Key officers will receive training in social responsibility requirements contained within LCCP and the ELM staff will be expected to be trained in the social responsibility requirements and this will be checked additionally through several measures , one being test purchasing;</p> <p>6. As part of the operating licence the council will be subject to regular monitoring through returns and audits</p>
Final recommendation for this issue	Progress the Good Causes Lottery with the above safeguards.
Opportunities to further the aims of the PSED	
<p>1. Eliminate Unlawful discrimination, harassment, victimisation & any other conduct prohibited by the Act.</p> <p>2. Advance Equality of Opportunity</p> <p>3. Foster good relations</p>	The mitigation proposed for this issue will meet aim two of the Duty by meeting the needs of younger people and disabled persons putting safeguards in place.

Issue 2	Gambling Addiction (or risk of)
Stakeholders/interested parties	<p>Internal stakeholders: Information Governance and Equality Officer, Communications, Legal, Licensing, CMT, Members and Personal Licence holder.</p> <p>External stakeholders: Other Local authorities in Kent and neighbouring counties, Gambling Commission http://www.gamblingcommission.gov.uk , approved 'good causes' who offer services or deliver projects to under 16's, External lottery Manager and residents.</p>

Consultation & Engagement	<p>Discussions with various council departments including Legal, Finance, community services and communications have commenced and will continue during the life of the project. The project lead is also working closely with information governance and equality to ensure all policies and procedures are current, effective and lawful.</p> <p>Discussions are ongoing with other local authorities where similar projects are in progress to ensure best practice is embodied in the lottery at all times. Consultation with residents took place as part of the budget setting process and this will provide the platform for additional consultation on good causes in the future.</p> <p>The lottery website will also signpost those customers to Gamble aware and Gam care websites which provide general information about gambling, including how to gamble safely and where to get help if you or someone you know has problems with their gambling. It will also make it clear on how to self- exclude directing to organisation such as “ Count Me Out “ , “Gam block”,</p>
Data sources and evidence	<p>http://www.gamblingcommission.gov.uk/site-elements/images/stats-graphics/Participation-graphic-2016.png</p> <p>http://www.gamblingcommission.gov.uk/PDF/survey-data/Stats-online-behaviour-graphic-2016.pdf</p> <p>http://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-participation-in-2016-behaviour-awareness-and-attitudes-technical-annex.pdf</p> <p>http://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-participation-in-2016-behaviour-awareness-and-attitudes.pdf</p>
Protected Characteristic(s)	<p>Although not necessarily a disability, the assessment team believe that there is a link between addiction and mental health which if lasting more than 12 months would engage the PSED under the protected characteristic of disability.</p>

affected	
Impacts Identified	Potential risk to those with gambling addiction.
Mitigation options, reasonable adjustments and potential solutions	<ol style="list-style-type: none"> 1. All Promotional channels including direct advertising, web sites will incorporate messages promoting Responsible gambling. 2. Signposting to organisations linked with gambling addiction services (Gam Care ,and Gamble aware) and general messages on the ELM hosted lottery home page will further promote responsible gambling including links back to the council web site to promote the gambling policy of TDC which gives an overview and guidance. 3. There will be a direct link to the Gambling Commissions list of organisations that help with addition and it results http://www.gamblingcommission.gov.uk/for-the-public/Safer-gambling/Getting-help-to-control-your-gambling.aspx#Organisations_that_provide_help 4. Combating problem gambling- promoting socially responsible gambling and must make annual financial contribution to one or more organisation (s) which between them research into the prevention and treatment of gambling –related harm, develop harm prevention approaches and identify and fund treatment to those harmed by gambling 5. Customers interaction – where there are concerns that a customer’s behaviour may indicate problem gambling, the types of behaviour will be logged/reported to the appropriate level of staff and which may trigger customer interaction at an appropriate moment 6. Self-Exclusion options, and it will have procedures to ensure that all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self –exclusion agreement from participating in gambling. 7. There will be information provided to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend. This can be done by providing a maximum amount of lottery tickets an individual can purchase for each lottery draw.
Final recommendation for this issue	Progress the Good Cause Lottery with the above safeguards.

Opportunities to further the aims of the PSED	
1. Eliminate Unlawful discrimination, harassment, victimisation & any other conduct prohibited by the Act.	The mitigation proposed for this issue will meet aim two of the Duty by safeguarding those with addiction issues (falling under the protected characteristic of disability).
2. Advance Equality of Opportunity	
3. Foster good relations	