

Lottery Complaints Policy and Procedure

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Revision Summary

- 05/2023 New.

Policy Statement**What is this policy intended to achieve?**

The purpose of this policy is to ensure that all Lottery staff manage complaints from supporters and the public in a manner that is efficient, consistent, transparent, respectful, and fair.

To whom does this policy apply?

To all Lottery staff and all frontline fundraising staff in the community.

Who should read this policy?

All Lottery and frontline fundraising staff. This policy will also be made available to the public via all Lottery websites.

Definitions and Terminology

Complaint means an expression of dissatisfaction from a supporter about the service they have received. It will require investigation and usually a written response.

Complainant For the sake of clarity, in this policy and procedure, a Complainant is anyone making a complaint or registering a concern.

Complaint Handler The designated member of the Lottery Team responsible for dealing with a particular complaint and being the single point of contact for the Complainant. Generally, this will be the National Sales Manager, but the responsibility may be delegated case by case.

Concern is a notification that an aspect of the Lottery service is, or might be, unsatisfactory; but not so much that the Complainant feels they have personally suffered as a result. A concern generally will not be serious or complex and can be addressed promptly with minimal intervention. It is unlikely to require a written response.

Getting it Right

- The Lottery Department will attempt to resolve all concerns and complaints promptly using the procedure detailed below. Where this is not possible, we will upgrade the matter to a formal dispute and refer it to the Independent Betting Adjudication Service (IBAS).
- All concerns and complaints must be logged by the staff member receiving them on the Sentinel Complaints Module for the attention of the Business Development Manager, with a copy to the Lottery Executive Manager.
- **All activity** relating to a concern or complain – communications, meetings, investigations, learning, changes to policies, and actions – must be documented on the relevant complaint record. Complaints must not be logged on the Incidents Module.
- The Lottery Executive Manager will ensure that all appropriate Lottery staff are sufficiently trained to receive, report, and investigate concerns and complaints.
- Any concerns or complaints regarding Lottery fundraising should be reported to the Business Development Manager. All other concerns and complaints should be reported to the most senior team member on the day. Once they have been reported, these managers have operational responsibility for managing concerns and complaints reported to them. This includes ensuring that an adequate record is made of all concerns and complaints, including all correspondence,

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investigation findings, outcomes, and actions. Without exception, where no action is taken with respect to a complaint, the reasons for this should be recorded.

Being Customer Focused

- Anyone should be able to make a complaint or raise a concern with any member of staff, either verbally or in writing.
- The Lottery Executive Manager will ensure the current version of this policy is available via its dedicated website.
- Concerns or complaints received anonymously should be dealt with as fully as practicable. When anonymity means the concerns or complaints process cannot be applied fully, any exceptions or limitations should be documented and explained. Anonymity should never prejudice the credibility of a concerns or complaint.

Acting fairly and proportionately

- The Lottery Department (and everyone working within it) has a duty to be honest, open, and truthful in all dealings with its supporters and the public. Nevertheless, St Helena recognises the stress that complaints can sometimes place on staff and will support them, including with safe and supportive spaces to share and reflect on lessons learnt. The above notwithstanding, organisational, and personal interests must **never** be allowed to outweigh our duty to be honest, open, and truthful.

Putting things right

- Lottery staff should establish with the Complainant at the outset the outcome they are looking to achieve; be this an immediate remedy for a problem, an explanation or apology, a full investigation potentially leading to disciplinary action, a legal claim, or a change to the Lottery Department's policies, procedures, or operation. As far as is proper and practicable, the Lottery Department should always strive to provide the outcome the Complainant desires.

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- As per Gambling Commission guidance, complaints can only be accepted concerning events that have occurred in the six months preceding the date of the complaint.

Seeking continuous improvement

- Every complaint should be treated as an opportunity to provide a better Lottery service.
- Appropriate action must be taken without delay to respond to any failures identified by a complaint. All actions should be appropriately documented on the complaint record with appropriate documentary evidence of their completion.
- The Lottery Executive Manager will also enforce compliance with complaints handling standards, ensuring investigations are timely and adequate, and actions mandated in response to concerns and complaints are monitored and completed.
- The Commercial Director will regularly pull current complaints from Sentinel to look for outlining trends and compliance for complaint handling.

Being Responsive and Caring

- At all times, Lottery staff should deal with concerns and complaints sensitively, positively, and empathetically; ensuring that the Complainant knows that they are being listened to and taken seriously and that we understand the outcome they are seeking. The Complainant should never be made to feel that they are a burden, an inconvenience or nuisance to staff. Staff must avoid presenting the process of making a formal complaint as intimidating, confrontational or onerous.

Complaints Procedure

- Complaints must be logged on Sentinel by the person receiving them and notified to the Business Development Manager/Administration Lead and the Lottery Executive Manager. All complaints should be logged within one working day of receipt.

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- Where staff taking the complaint do not have access to Sentinel, they should communicate the details of the complaint, within one working day, to the Business Development Manager/Administration Lead who will then log it.
- Complainants should be encouraged to send their initial communication via email. Complaints can also be taken via the Lottery website.
- Sentinel reports must include all relevant information, in particular:
 - a. Full contact details of the Complainant
 - b. Full details of the complaint: what went wrong and any consequences to the Complainant.
 - c. Any immediate actions take prior to reporting
 - d. What resolution the Complaint is seeking.
 - e. Which form of feedback the Complainant wishes to receive.
 - f. Any special communications requirements the complainant may have.
- Upon receipt of a complaint, the Business Development Manager as Complaint Handler should send the Complainant an acknowledgement of the complaint by post or email. This acknowledgement should contain:
 - a. A summary of the nature of the complaint.
 - b. The resolution sought by the complainant.
 - c. A copy of, or a link to, the current version of this policy.
 - d. Contact details of the Complaint Handler.
- The Business Development Manager may delegate complaint handling to another member of staff, ensuring that this is documented on the record and the Complainant informed.
- The turnaround time between a complaint being received and a full response being sent to the Complainant should be five working days, but this may be extended at the discretion of the Lottery Executive Manager. In cases where the period is extended, the Complainant must be informed at least one working day before the deadline is due to expire, including the reasons why. Deadlines may be extended to a maximum period of 10 working days. If further extensions are required beyond this point, the complaint must first be reviewed by the

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Commercial Director. The Gambling Commission allows a maximum period of eight weeks to resolve a complaint. Should we be unable to reach a mutually acceptable resolution with the Complainant after eight weeks, then the Lottery Executive Manager will send the Complainant our final decision and statement that the complaints process is now ended, and will inform them of their right to 'alternative dispute resolution'.

- Once an investigation is complete and actions (if any) proposed, the Complaint Handler will prepare a written report for the Complainant. This report will include:
 - a. The details of the Complainant and when the complaint was received.
 - b. A summary of complaint, broken down by specific points where needed.
 - c. The response sought by the complainant.
 - d. A point by point response to the complaint, with a finding of whether each is upheld or rejected.
 - e. A summary of actions that will be taken because of the complaint.
- If the Complainant remains unsatisfied once the investigation report has been sent, the Complaint Handler will make good faith efforts to understand the reasons for their dissatisfaction and work towards an agreed resolution. However, if no agreement can be concluded within eight weeks of the report date, then the complaint will be upgraded to a dispute. The Lottery Executive Manager's final decision will be sent to the Complainant, and they will be offered 'alternative dispute resolution' through IBAS. If this is done, the Lottery Executive Manager will ensure that the Complainant is told that IBAS reserves the right to refuse to adjudicate cases.
- All investigation reports will be reviewed by the Lottery Executive Manager before they are sent to the Complainant. This review will include formal approval of recommended actions.
- the Commercial Director will obtain a monthly Sentinel Complaint report and will present this to SLT.
- The Lottery Executive Manager will also ensure that complaints are reported annually to the Gambling Commission where required.

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Associated Policies and Procedures

- Lottery Commission Enforcement Policy [705]
- Lottery Responsible Gambling Policy [709]

Compliance with Statutory Requirements

- Gambling Act (2005)
- Code of Fundraising Practice

Responsibilities/Accountabilities

Title	Accountability
CEO	Responsible for overall compliance with this policy.
Commercial Director	Executive oversight of compliance with this policy.
Lottery Executive Manager	1 st line responsibility for ensuring compliance with this policy
All Lotteries staff and volunteers	Responsible for ensuring they are familiar with this policy and comply with it.

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