

Lottery Complaints Policy and Procedure

Originated by:	David Traynier, Head of Quality and Compliance
Date Ratified:	19/07/2023
Ratified by:	Jill Moore, Lottery Executive Manager
Revised by:	Klaudyna Grela-Revell, Lottery Business Manager
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Ratified by:	Jill Moore, Deputy Associate Director
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Revision Summary

- 03/06/2024 Reviewed to ensure remains current and reflects the move from Jumbo to StarVale
- 03/06/2024 job title change from Lottery Executive Manager to Lottery Business Manager throughout the document
- 03/06/2024 job title changed from Business Development Manager to Lottery Business Manager
- 05/2023 New.

Revision History

- 03/06/2024 Document checked to ensure it is still relevant

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 Lottery Business Manager, with a copy to the Associate Commercial Director.
- **All activity** relating to a concern or complain – communications, meetings, investigations, learning, changes to policies, and actions – must be documented

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on the relevant complaint record. Complaints must not be logged on the Incidents Module.

- The Lottery Business Manager will ensure that all appropriate Lottery staff as well as StarVale 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 Lottery Business Manager. All other concerns and complaints should be reported to the most senior team member on the day. Once they have been reported, these employees 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, 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 Business 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 including StarVale team) 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

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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.
- 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 Business 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 Associate 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

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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 Lottery Business Manager. All complaints should be logged within one working day of receipt.
- 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 Lottery Business Manager 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 taken 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 Lottery Business 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.

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- The Lottery Business 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 by the StarVale team and a full response being sent to the Complainant should be five working days, but this may be extended at the discretion of the Associate Commercial Director. 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 Associate 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 Business 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 Business Manager's final decision will be sent to the Complainant, and they will be offered

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‘alternative dispute resolution’ through IBAS. If this is done, the Lottery Business 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 Business Manager before they are sent to the Complainant. This review will include formal approval of recommended actions.
- the Associate Commercial Director will obtain a monthly Sentinel Complaint report and will present this to SLT.
- The Lottery Business Manager will also ensure that complaints are reported annually to the Gambling Commission where required.

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 Business Manager	1 st line responsibility for ensuring compliance with this policy

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Title	Accountability
All Lotteries staff and volunteers	Responsible for ensuring they are familiar with this policy and comply with it.

Staff Training Requirements

All Lotteries staff to be required to read this policy and any updates.

The Deputy Commercial Director to ensure that the Lottery Business Manager and other Lottery Team Members receive additional complaint handling training as part of their induction with periodic refreshers. This includes the use of the Sentinel Complaints Module.

Monitoring (Including Audit) and Frequency of Review

Policy to be reviewed every three years.

Data Protection

Does this Policy require sign off from the Data Protection Officer?	No
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References:

None

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Equality Impact Assessment Initial Screening Tool

Document Reviewer(s):	Klaudyna Grela-Revell, Lottery Business Manager	Date Assessment Completed:	03/06/2024
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Assessment of possible adverse impact against any minority group

Could the document have a significant negative impact on equality in relation to each area below?	Response		If yes, please state why, and the evidence used in your assessment
	Yes	No	
1. Age		X	
2. Sex		X	
3. Disability		X	
4. Race or Ethnicity?		X	
5. Religion and Belief?		X	
6. Sexual Orientation?		X	
7. Pregnancy and Maternity?		X	
8. Gender Reassignment?		X	
9. Marriage and Civil Partnership?		X	

- You need to ask yourself:
- Will the document create any problems or barriers to any community or group?
- Will any group be excluded because of this document?
- If the answer to either of these questions is yes, you must complete a full Equality Impact Assessment.

Assessment of positive impact

Could the document have a significant positive impact by reducing inequalities that already exist?	Response		If yes, please state why, and the evidence used in your assessment
	Yes	No	
1. Promote equal opportunities		x	

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2. Eliminate discrimination		x	
3. Eliminate harassment		x	
4. Promote positive attitudes towards disabled people		x	
5. Encourage participation by disabled people		x	
6. Consider more favourable treatment of disabled people		x	
7. Promote and protect human rights		x	

On the basis of the information/evidence/consideration so far, do you believe that the document will have a positive or negative adverse impact on equality?

Positive	Please rate (delete as applicable) the level of impact				Negative
			NIL		

Is a full equality impact assessment required? No

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