

LOT10 – Lottery Delegated Authority Policy

1.0 Introduction

- 1.1 This document sets out the policy and procedures of **St Raphael's Hospice** for delegating authority to Annex A approved persons (responsible persons) named on our Gambling Commission Licences in relation to our licensed society Lottery activities in Great Britain.
- 1.2 It applies to named Annex A's as reflected on Schedule X of **St Raphael's Hospice** licences and noted within this policy. The powers delegated to the Annex A's relate only to **our society Lottery activities**, they do not apply to any other roles or responsibilities held by any named Annex A.
- 1.3 This policy defines all individuals authorised by **St Raphael's Hospice** to carry out activities under its licences issued by the Gambling Commission in Great Britain.
- 1.4 It reflects the delegation of operational functions to **Sterling (External Lottery Manager)**, while retaining ultimate accountability within the hospice.

2.0 Statement of Intent

- 2.1 **St Raphael's Hospice** has delegated authority to its Annex A's, individually and collectively, as a condition of the Gambling Commission licences is that these individuals are able to control and administer the licensed activities including lotteries and raffles.
- 2.2 All members of **St Raphael's Hospice** must ensure that Annex A's are given the authority as allowed by this policy.

3.0 Licence Structure & Responsibilities

- 3.1 Licence Holder: **St Raphael's Hospice**
- 3.2 St Raphael's Hospice retains responsibility for:
 - 3.2.1 Overall governance and compliance
 - 3.2.2 Oversight of the External Lottery Manager
 - 3.2.3 Financial Assurance and Audit

3.2.4 Ensuring compliance with the LCCP

External Lottery Manager: **Sterling Management Centre Ltd**

3.3 The External Lottery Manager is responsible for:

3.3.1 Day-to-day lottery operations

3.3.2 Direct Debit bureau (**St Raphael's Hospice** has their own SUN, funds routed directly to **St Raphael's Hospice**)

3.3.3 Player management and database

3.3.4 Draw management and prize fulfilment (cheques supplied by **St Raphael's Hospice**, paid from **St Raphael's Hospice** bank account)

3.3.5 Preparation of lottery accounts

3.3.6 preparation and submission of lottery submissions (subject to verification by Annex A)

3.4 Sterling operates on the instruction of **St Raphael's Hospice as the Licence Holder** – responsibility is delegated but the accountability remains with **St Raphael's Hospice**

4.0 Authorised Persons Register

4.1 Hospice Staff

Name	Role	Authority	Limitations
Lucy Ribaudo	Annex A – Lottery Lead / Head of Supporter Care	Strategic Oversight of lottery, approval of ELM, compliance accountability, oversight of all marketing and advertising	
Sue Snelling	Annex A – Lottery Officer	Financial oversight, income reconciliation, audit liaison	No direct handling of DD's
John Groom	Annex A – Director of Operations inc Finance	Strategic, Financial & Compliance oversight & Remote Technical Standards and IT	

4.2 Sterling (External Lottery Manager)

Name	Role	Authority	Limitations
Tony Jarvis	Client Relationship Manager	Full management of lottery	Must report to St Raphael's Annex A's
	Finance/Accounts Team	Direct Debit and income handling Preparation and submission of lottery submissions	No strategic decision-making
	Technical administration team	Database management, running of draws, preparation of prize cheques, supporter queries	
	Compliance Lead	ComplianceWise webinars, annual policy review, non-contractual guidance on compliance	Accountable to St Raphael's Hospice

5.0 **Authority Model**

5.1 Direct Debits (Sterling-controlled)

5.1.1 All DD setup, collection and processing sits with Sterling

5.1.2 St Raphael's Hospice does not handle player bank details directly

5.1.3 St Raphael's Hospice retains responsibility for:

5.1.3.1 Oversight

5.1.3.2 Reconciliation checks

5.1.3.3 Assurance via reporting

5.2 Lottery Operations

5.2.1 Delegated to Sterling

5.2.1.1 Draw Management

5.2.1.2 Entry Processing

5.2.1.3 Prize administration (printing & sending of cheques. Cheques are provided by St Raphael's Hospice and are linked to St Raphael's bank account)

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5.2.2 St Raphael's Hospice retains:

5.2.2.1 Monitoring

5.2.2.2 Contract management

5.2.2.3 Risk Oversight

5.2.2.4 Financial Controls

5.2.3 Sterling – Process and collect funds on behalf Of **St Raphael's Hospice** and funds are paid into the St Raphael's nominated Bank Account

5.2.4 St Raphael's Hospice – verifies and reconciles

6.0 Oversight and Assurance Framework

6.1 The appointed Annex A's of St Raphael's Hospice will:

6.1.1 Hold regular contact and performance meetings with Sterling

6.1.2 Review:

6.1.2.1 Income Reports

6.1.2.2 Player numbers

6.1.2.3 Complaints received by Sterling and St Raphael's

6.1.2.4 Compliance Updates

6.1.3 Maintain:

6.1.3.1 Audit trail of oversight

6.1.3.2 Documented challenges and reviews

7.0 Training & Competence

7.1 Our Annex A's must understand

7.1.1 Their oversight responsibilities

7.1.2 Key risks in outsourced lotteries

7.1.3 Their LCCP responsibilities

7.2 Sterling are responsible for ensuring their staff have

7.2.1 Operational training

7.2.2 Compliance competence

7.2.3 Providing evidence on request

8.0 Annex A Responsibilities and Delegated Authority

In relation to our Gambling Commission Licences for society Lottery operations we delegate the following authority to our Annex A's, individually and collectively:

8.1 Invoices

The Annex's A have authority to sign off any invoice related to Lottery expenditure, up to the value of £6,000 any one invoice.

8.2 Monthly lottery submissions:

The Annex A's have authority to verify our monthly lottery submissions to the Gambling Commission. There is no limit to the value of these monthly lottery submissions as they will relate solely to our Lottery income and expenditure.

8.3 Quarterly Gambling Commission Regulatory Returns

The Annex A's have authority to submit our Quarterly regulatory returns to the Gambling Commission. There is no financial value of these returns as they will relate solely to our Lottery operational activities.

8.4 Audit

The Annex A's have delegated authority to appoint and instruct qualified independent audit firm for the purposes of assessing our Lottery operations annually in accordance with the Gambling Commission's Remote Technical Standards, which is a condition of our remote licence.

8.5 Active Incidents

The Annex A's have delegated authority to act in the best interests of St Raphaels Hospice in the event of a Lottery related incident i.e if the Random Number Generator is not working, issues with Sterling affecting the draw, complaints with and involving canvassing agencies, data protection or transfer of data or employee related incidents.

Where time allows any incidents should be discussed at the relevant level of authority within St Raphael's, but the responsibility for the decision and consequence remains with the Annex A. In the event a quick decision needs to be made St Raphael's Hospice delegates any authority required to the

Annex A's to ensure our compliance and continuation with our Lottery Activities.

8.6 LCCP Conditions

The Annex A's have delegated authority to act in accordance with the requirements of the Licence Conditions and Code of Practice ('LCCP') set out by the Gambling Commission, this includes but is not limited to the areas identified in the Appendix to this policy named Annex A Decision Matrix with LCCP Mapping.

8.7 Face to Face Fundraising

8.7.1 Annex A's must approve any agency used, as they will have to complete checks as per the LCCP

8.7.2 The contract with any agency must be approved by the Annex A as they will need to include LCCP conditions. i.e cancellation with no penalty and acting under our Licence conditions

8.7.3 Annex A must reconcile any invoices received to ensure they are correct

8.7.4 As a result, the Annex A has a specific delegated authority to sign off invoices for Face to Face fundraising over their agreed limit, this is limited to a total amount as approved by the Income Generation and Finance committee and Board of Trustees, prior to commencement of the campaign.

9.0 Review

9.1 This policy will be reviewed on an annual basis

9.2 The policy will be reviewed by all current Annex A's at the time of review

9.3 The policy will also be sent to the ELM for review before being sent for approval by the Trustees of St Raphael's Hospice

Appendix

Annex A Decision Matrix with LCCP Mapping

This document maps key lottery decisions to roles and relevant LCCP clauses (Gambling Commission).

1. Lottery Operations

Decision: Approve lottery structure

Roles: Hospice ANNEX A (Accountable), **LCCP Reference:** LCCP 1.1.1 – Responsibility for licensed activities

Decision: Run lottery draw

Roles: Sterling (Responsible) St Raphael's Hospice (Inform)

LCCP Reference: LCCP 4.2.1 – Fair and transparent terms

Decision: Prize fulfilment

Roles: Sterling (Responsible)

LCCP Reference: LCCP 4.2.1 – Customer fairness

1. Direct Debits & Income

Decision: Process Direct Debits

Roles: Sterling (Responsible)

LCCP Reference: LCCP 5.1.1 – Financial controls

Decision: Income reconciliation

Roles: St Raphael's Hospice Finance (Responsible) ANNEX A (Accountable)

LCCP Reference: LCCP 5.1.1 – Segregation of duties

Decision: Refund decisions

Roles: Sterling (Responsible) St Raphael's Hospice (Accountable for exceptions)

LCCP Reference: LCCP 4.2.1 – Fair treatment

2. Compliance & Regulatory

Decision: Submit returns

Roles: Sterling (Responsible) ANNEX A (Accountable)

LCCP Reference: LCCP 15.3.1 – Reporting to Commission

Decision: Manage breaches

Roles: Sterling (Responsible) ANNEX A (Accountable)

LCCP Reference: LCCP 1.2.1 – Compliance with licence conditions

Decision: Policy approval

Roles: ANNEX A (Accountable), St Raphael's Hospice (Responsible)

LCCP Reference: LCCP 1.1.2 – Governance

3. Oversight of ELM

Decision: Performance review

Roles: ANNEX A (Accountable), St Raphael's Hospice (Responsible)

LCCP Reference: LCCP 1.1.1 – Accountability

Decision: Contract management

Roles: ANNEX A (Accountable)

LCCP Reference: LCCP 1.1.2 – Governance arrangements