



THE FORCES LOTTERY COMPLAINTS POLICY & PROCEDURE

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
1.0	Richard Dixon	04/10/2021	Initial	Karl Wild
1.1	Richard Dixon	04/10/2022	Review- no changes	Natasha Beets
2.0	Richard Dixon	01/10/2023	New format, full redraft	Natasha Beets
3.0	Richard Dixon	01/04/2024	Review, no material changes	Natasha Beets

COMPLAINTS POLICY

COMPLAINTS POLICY STATEMENT

Sterling Management Centre Limited is committed to providing quality services to our clients and service users. We take all concerns & complaints regarding the Forces Lottery administration seriously, and work to resolve them quickly and effectively. Sometimes we get things wrong, and when we do we would like you to let us know that you're unhappy. We value your feedback and welcome the opportunity to respond.

- Above all, we aim to resolve all complaints agreeably and efficiently.
- We will endeavour to provide a fair complaints procedure that is easy to access, clear, and simple to use.
- We will be honest in our dealings with your complaint and ensure complaints are investigated thoroughly.
- We are committed to learning from complaints and will take action to improve.
- We will keep a register of all complaints (**Annexure A**) for a minimum of three years, and submit them to the Gambling Commission on request.

DEFINING COMPLAINTS & DISPUTES

For the purposes of this policy and for Social Responsibility code provision 6.1.1. of the Licence Conditions and Codes of Practice, 'complaint' means an expression of dissatisfaction, whether spoken or written, about any aspect of the way we conduct our licensed activities. For example, a complaint:

- About the outcome of a gambling transaction,
- About the way a gambling transaction has been managed,
- That concerns the way we carry out our business in relation to the three licensing objectives.

'Disputes' in this policy and for the purposes of Social Responsibility code provision 6.1.1 of the Licence Conditions and Codes of Practice are those complaints about the customer's gambling transaction (including management of the transaction) and have not been resolved at the first stage of our complaints procedure. Disputes may include, for example, those linked to terms and conditions, account management, or the ability to access prizes and winnings.

TIME LIMITS FOR COMPLAINTS

Should you feel the need to submit a complaint in relation to The Forces Lottery, we ask that you do so within six months from the date of the incident.

The entire complaints process, including any internal investigations will take no longer than eight weeks from when we received your complaint, unless we are waiting for a response or additional information from you (for example, where you fail to respond to a reasonable request for information within seven days, we will 'stop the clock' until such time as you respond. When you respond, the clock will be restarted from the same point it was stopped).

COMPLAINTS PROCEDURE

STAGE ONE

Any complaints relating to The Forces Lottery should be reported directly to The Forces Lottery helpline on 0370 050 5891 (Mon – Fri, 9am – 5pm, except UK Bank Holidays) or email info@theforceslottery.co.uk. The operator will acknowledge and log your complaint details and notify the relevant Client Relationship Manager and nominated responsible person at the society/ charity whose lottery is affected as soon as possible, but no later than within three working days. Alternately you can log your complaint by post to: Head of Compliance, Sterling Management Centre Limited, Furness Gate, Furness Business Park, Peter Green Way, Barrow- in- Furness, Cumbria, LA14 2PE.

Any problems or concerns will be formally recorded within the Complaints Log, initially as an 'incident', for future analysis by Sterling Management Centre Limited and for the purpose of Gambling Commission reporting.

We ask that you do not share your complaint on any public platforms (i.e. to the press, online forums or social media) before the Promoter has had an opportunity to resolve the complaint. We ask that you refrain from doing so in order to ensure that any information in the public domain does not compromise the integrity of the investigation.

The Promoter of the lottery will investigate your complaint involving the relevant parties as necessary. The Promoter shall make the decision on the complaint and be in contact with you to let you know the outcome of your complaint and any actions taken as a result of this. The Promoter shall make the final decision on the complaint pursuant to the rules of The Forces Lottery.

STAGE TWO

If you are unhappy with the outcome of your complaint, you should put your complaint in writing to: Head of Compliance, Sterling Management Centre Limited, Furness Gate, Furness Business Park, Peter Green Way, Barrow- in- Furness, Cumbria, LA14 2PE or by email to: compliance@sterlinglotteries.co.uk.

The matter will be escalated to a “Dispute”, if applicable, and the Promoting society/ charity will be notified.

You will be sent an acknowledgement of your complaint in writing, within 48 hours of us receiving it and the Promoter of the lottery will investigate your complaint.

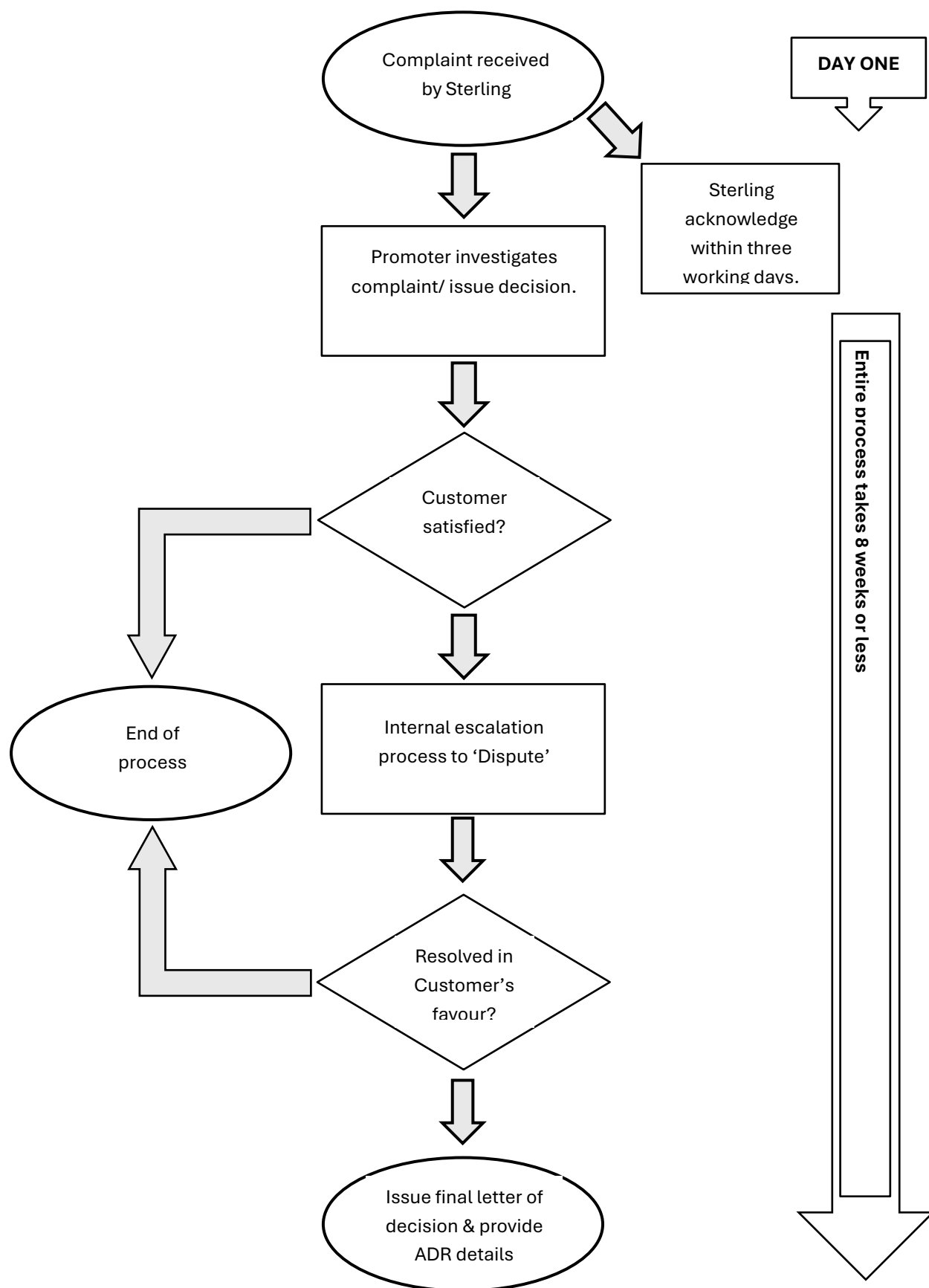
Every effort will be made to complete this investigation within 7 days of receipt.

The Promoting society/ charity will then contact you with their findings, recommendations and proposed actions.

STAGE THREE

In the event that your complaint cannot be resolved by The Promoter of the society/ charity whose lottery your complaint relates to, you can contact the society/ charity’s designated ADR, which is a free third party Alternative Dispute Resolution entity service. This information will be provided to you in the Promoter’s response to your complaint.

COMPLAINT PROCESS FLOWCHART



ANNEXURE A

THE FORCES LOTTERY PLATFORM

Date complaint submitted by the customer: _____

Affected society/
charity: _____

Employee responsible for receiving complaint: _____

Date Sterling acknowledged the complaint: _____

Customer account Member
ID: _____

Details of notification to Society (please include time, date, method of notification & details of responsible person):

Complaints must be escalated to the society/ charity within three working days, and logged in the complaints log.

Specific details of the complaint:

Type of complaint

☐ Self-exclusion

☐ Safer gambling tools

☐ Customer interaction

☐ Gambling transactional issues

☐ Withdrawals / Financial transactions

☐ Marketing and Advertising

☐ Bonus or Promotional offer terms

☐ Other (please specify): _____

Details of any time the clock was stopped during the complaint investigation (for example, where a customer fails to respond to a reasonable request for information within seven days):

Date a final resolution (or deadlock) letter was sent to the
customer: _____

If the complaint was referred to an Alternative Dispute Resolution provider, please provide details of
ADR: _____

The outcome of any dispute referred to an ADR provider, where the provider accepts the case:_____

Any court proceedings adverse to the licensee resulting from the complaint:_____

Records must be retained for inspection for at least three years from the date of the resolution or conclusion of the complaint or dispute to which they relate.

The Gambling Commission do not require Sterling to keep complaints about customer service or other non-gambling related complaints or disputes.

This reporting requirements applies to holders of all Licences (including ancillary remote licensees).

Note, that Sterling and the relevant society must notify the Gambling Commission about total numbers of complaints and referrals to ADR providers as part of regulatory returns.

This policy has a related policy: Client Helpline Call Handling Policy.