

Lottery complaints procedure

1. A complaint may be raised with any member of staff, verbally or in writing, within a six month period following the date of the incident. Complaints may be made formally or informally. Staff will deal with complaints in a sensitive manner. If, due to the nature of a complaint, the member of staff is unable to handle the complaint verbally, written details will be passed to the national sales manager.
2. If the complainant wishes to make a verbal complaint, the following details should be recorded in all instances:
 - The name of the person making the complaint.
 - The complainant's contact details.
 - The date received.
 - The name and position of the person receiving the complaint.
 - A full description of the complaint, which the complainant should be asked to sign off for accuracy (where appropriate).
 - The outcome or response the complainant is seeking, including whether they want a response and, if so, in what form.
 - Any special communication requirements or other needs the complainant might have.
3. All complaints will be reported in the first instance to the national sales manager (in their absence this would be dealt with by the lottery manager).
4. All complaints are logged (Sentinel) and the lottery manager is notified.
5. For all formal complaints, the national sales manager (or lottery manager) will be the complainant's point of contact throughout the complaint; the national sales manager will ensure an investigation is conducted and will inform the complainant of any delays in the process.
6. For formal complaints, complainants will be sent a written acknowledgement from the relevant case handler within 24 hours (working days only) of their complaint being received.
7. This letter should include the following:
 - A summary of the complaint
 - The resolution sought
 - An outline of the process that will be followed
 - The name and contact details of the case handler
 - Any other pertinent information.
8. Details of the investigation, any action taken and any correspondence with the complainant are fully documented (Sentinel) and the lottery manager is notified.
9. A full response should be sent to the complainant within five working days of receipt of the original complaint. If it is not possible to complete the investigation within five working days, a letter should be sent to the complainant as soon as possible (within five working days), explaining the reason(s) why and proposing a new deadline. If this deadline also cannot be met, another letter should be sent by before the new

deadline proposing a further extension. This process should be repeated until the investigation is complete.

10. The full response will include a summary of the investigation findings. The complainant will be invited to confirm, by writing or by phone, if they are satisfied with the outcome. If the complainant is satisfied, the complaint will be closed. The deadline for response on this will be 10 working days, after which, if no response is received, the complaint will be closed.
11. Whilst we aim to resolve complaints within five working days, the entire complaints process, including internal escalation, may not take longer than eight weeks from when the complaint is first received (the 'clock may be stopped' in case the customer fails to respond). Should the complaint be unresolved by the end of the eight week period, a letter will be sent with the final decision and statement that this is the end of the complaints process.
12. If the complainant is not satisfied with the outcome, the complaint will be escalated to a 'dispute', if applicable. In this instance, a letter of acknowledgment will be sent to the complainant, offering an 'alternative dispute resolution' (ADR). It must be noted that this is not a guaranteed process referral. The ADR will be referred to the **Independent Betting Adjudication Service Limited** (www.ibas-uk.com) via our trade associations with The Lotteries Council.
13. If the complaint is referred to Independent Betting Adjudication Service Limited Ltd, St Helena will cooperate fully with any ensuing investigation.
14. If the complaint was justified, the relevant manager will ensure that an anonymised summary is sent to the appropriate team to ensure lessons are learned and practice is improved/ changed. The manager will determine appropriate actions and ensure compliance. Staff members should be supported to reflect on their practice as required.
15. If a complaint merits invoking the disciplinary process against any member of staff, this will be determined by the commercial director in consultation with the manager and in compliance with the Disciplinary Policy. The complainant shall be informed of the disciplinary process and, at the discretion of the manager, its outcome.