#### Theirworld Gambling Complaints Policy

Theirworld Projects Ltd promotes its own society lottery licensed and regulated by the Gambling Commission for the sole purpose of raising funds for Theirworld in order to support its beneficiaries (the "Lottery"). The Lottery is managed on behalf of Theirworld Projects Ltd. by its External Lottery Manager ("ELM"); Postcode Lottery Limited (marketed as People's Postcode Lottery).

The Lottery is promoted and managed by People's Postcode Lottery. A minimum of 32% from every £10 monthly subscription for draws promoted by Theirworld Projects Limited and Theirworld supports our vital work.

Theirworld Projects Ltd. is committed to ensuring that the Lottery is operated in a secure, fair and socially responsible way and to endorsing responsible gambling amongst its players. It expects its ELM to have the appropriate processes in place to ensure that the objects outlined in The Gambling Act 2005 and referred to in this policy, stand up to scrutiny.

Theirworld Projects Ltd. is committed to providing excellent levels of service. It strives to meet customer expectations and welcomes feedback on where services can be improved or where expectations have not been met. This document sets out Theirworld Project's approach to such feedback and should be read in conjunction with Theirworld Projects Ltd established Complaints Procedure "Making a Complaint".

When a complaint is received about the Lottery or any other aspect of the Gambling Commission licence, the PPL compliance lead\* will review the complaint and, depending on what the complaint is actually about, either:

- Refer the matter to Theirworld Project's team to resolve the query according to the published complaints procedure or
- Refer it on PPL and ensure resolution via the PPL Complaints procedure

Where complaints are received by PPL, this will be resolved in accordance with their Complaints Policy.

Both the PPL Complaints Policy and the Theirworld Projects Ltd Complaints Procedure includes an Alternative Dispute Resolution Policy. The PPL Complaints Policy includes referral to an independent mediation service, or an independent third party expert, subject to the agreement of the complainant. Refer to the PPL's Complaints Policy Stage 4. Theirworld Projects Complaints Procedure includes reference to the independent and impartial policy or directly via an Alternative Dispute Resolution Service.

In addition, Theirworld Projects Ltd. will place reliance on the PPL's Complaints Procedure and its Alternative Dispute Resolution Policy. The PPL compliance lead has reviewed PPL's Complaints Procedure and its Alternative Dispute Resolution Policy and considers that they meet the Gambling Commission's requirements. PPL

will be required to confirm that its Complaints Procedure and its Alternative Dispute Resolution Policy are up to date and are being complied with at regular intervals.

Jan 2019 – Reviewed annually

## **Theirworld Gambling Complaints Procedure**

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Theirworld Projects Ltd. is committed to ensuring that the Lottery is operated in a secure, fair and socially responsible way and to endorsing responsible gambling amongst its players. It expects its External Lottery Manager (ELM) to have the appropriate processes in place to ensure that the objects and referred to in this policy, stand up to scrutiny.

#### COMPLAINTS PROCEDURE

The complaints procedure consists of four stages which are as follows:

### Stage 1: Acknowledgement and Resolution

The handler deals with the complaint immediately and is able to resolve the complaint at the first point of contact.

## Stage 2: Investigation

- 1. Complaint is formally recorded
- 2. If the complaint is not resolved at initial stage, the handler escalates to line manager level
- 3. Investigation takes place and line manager involves senior members of staff as needed
- 4. Complaints graded 'major' by line manager will alert to the Annex A holder immediately

If the investigation of the complaint is likely to take longer than five working days, we will notify the complainer advising of the proposed timescales and next steps, aiming to resolve the complaint within a maximum of 20 working days.

#### Stage 3: Outcome of the actions taken

The line manager or SMT member will respond to the complainer advising of the outcome of the complaint and any action taken as a result of the investigation.

If unresolved, the complaint is referred to the Director of Theirworld Projects Limited and the Annex A holders

# Stage 4: Alternative Dispute Resolution (ADR)

If the resolution of the complaint is not satisfactory at Stage 3, the complainer can request ADR with Lindsays, Seabraes House, 18 Greenmarket, Dundee, DD1 4QB TEL: 01382

346400 to resolve the dispute for which both parties are required to participate with and provides a mediation process that can be followed at no cost to the complainer. The mediator will report on the outcome of the dispute to the Gambling Commission and Theirworld Projects Ltd and the ELM will abide by the mediator's decision or recommendations. The complainer can appeal at any stage of the process.

## **REVIEW**

Jan 2019 - Reviewed annually