



Customer Complaints and Disputes Policy and Procedure

The Hospice Lottery Partnership (HLP) accept spoken or written customer complaints made in person, over the telephone, via post, email, and social media, or via third party intermediaries.

This Customer Complaints and Disputes Policy and Procedure provides customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation. This Customer Complaints and Disputes Policy and Procedure is made available to any player, online, by phone or by request in a printed or PDF form.

A complaint means an expression of dissatisfaction, whether spoken or written about any aspect of the way the HLP conducts activities.

For example, a complaint:

- About the outcome of a lottery transaction.
- About the way a lottery transaction has been managed.
- That concerns the way HLP carries out business in relation to:
 - Keeping the lottery free from crime and from being associated with crime.
 - Ensuring that the lottery is fair and open.
 - Protecting children and vulnerable people from being harmed or exploited by the lottery.

A dispute are those complaints that are about the customer's lottery transaction (including management of the transaction) that have not been resolved at the first stage of the Customer Complaints and Disputes Policy and Procedure.

How to make a complaint

Customers are able to access the Customer Complaints and Disputes Policy and Procedure, and the Official Complaints Form via:

- HLPs website on the homepage <https://hospicelottery.org.uk/> and within the FAQ section <https://hospicelottery.org.uk/faq/>
- A written or verbal request, or where customers find a written document hard to understand, assistance can be sourced by calling the office on: 01442 891459 and requesting a conversation with a senior member of staff.
- If a customer notifies that they are having difficulties raising a complaint, or are in a vulnerable situation, an employee will ask how they can assist.

The Procedure

Complaints are important because they offer an opportunity to show customers that concerns are taken seriously. This Customer Complaints and Disputes Policy and Procedure acts on complaints in a timely, fair, open, and transparent manner.

Verbal complaints: customers wishing to make a verbal complaint should telephone the Office on: 01442 891459 where a member of the Senior Management

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Team will ask the customer a series of questions in accordance with the Customer Complaints Form. HLP's Chief Executive will carry out a thorough investigation and respond directly to the customer.

Written complaints: customers wishing to make a written complaint should complete the Official Complaint Form and post it to: The Chief Executive, The Hospice Lottery Partnership, Honours Building, 72-78 Akeman Street, Tring, Hertfordshire, HP23 6AF, or email a copy of the form to: info@hospicelottery.org.uk.

Social Media complaints: HLP politely direct customers wishing to complain to follow the verbal or written complaints process.

Third Party Intermediaries: many consumers find third-party intermediaries support helpful when making a complaint. HLP accept complaints raised this way and will politely direct third-party intermediaries to follow the verbal or written complaints process.

Complaints involving other organisations as well as HLP: HLP may receive a complaint which also involves colleagues in other organisations such as canvassing or telephone service providers. If this should happen the investigation will be carried out in collaboration with the other service provider and a joint response will be drafted where appropriate.

Required Information

To assist HLPs investigations and prevent delay, the customer must provide as much detail as possible from the outset to help HLP resolve the complaint in a timely manner, but in any event no longer than 8-weeks from initial receipt. This includes:

- Name.
- Contact details: postal and email address' and telephone number,
- Membership/S number where available.
- Details of the complaint, including HLP representative name(s) and the incident location.
- Key dates and times.
- How the customer would like HLP to resolve the complaint.

Expected Timescales for Resolution

- HLP encourage customers to make complaints as soon as possible, but allow customers to raise complaints up to six-months from the date of the incident.
- HLP provide customers with an acknowledgement of the complaint as soon as reasonably practicable.
- Verbal and social media complaints are either resolved immediately or within 5 working days.
- Written complaints are responded to within 20 working days.
- The entire complaints process, including any internal escalation, takes no longer than eight-weeks (from when HLP first receive the customer's complaint) to resolve or issue a final response.

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- HLP have the right to depart from the eight-week time limit if the customer fails to engage with the complaints process in a timely manner.
- Where a customer fails to respond to a reasonable request for information within seven working days, it may be reasonable to 'stop the clock' until such time as the customer responds. When the customer has responded, the 'clock' will restart from the same point as it was stopped.
- The customer complaints process ends if the customer's complaint remains unresolved eight weeks (taking into account any times that the 'clock' on the time period may have been paused) after HLP received it, or the customer and HLP reach a deadlock or final position in less than eight weeks.
- HLP will then write to the customer with a final letter to explain:
 - The final decision.
 - That this is the end of the complaints process.
 - How to escalate their complaint to an independent Alternative Dispute Resolution (ADR) entity if they wish to do so.
 - HLP keep records of customer complaints and disputes, regardless of how the complaint was raised. Details of complaints and disputes are held on electronic file in accordance with the internal Archive Policy.

Unresolved Complaints

Unresolved complaints involving the gambling transaction, or the management of the transaction are referred to an ADR entity in a timely manner if not resolved to the customers satisfaction within eight-weeks of HLP receiving their complaint.

The ADR service is free of charge to the customer. HLPs ADR is directed to: Independent Betting Adjudication Service Limited (IBAS) <https://www.ibas-uk.com/> which is recognised by the Gambling Commission to provide informed and impartial adjudications on disputes that arise between licensed gambling operators and their customers, after the customer has completed the HLP's own internal dispute procedures and where a deadlock still exists.

There may be occasions when HLP may wish to ask customers not to share their complaint in public. For example, to the press or in online forums, before HLP has had opportunity to resolve the issue.

Responsibilities

Following review by the Qualified Persons (Chief Executive and the Head of Finance and Operations) where appropriate, policies receive approval, from The Finance and General Purpose Committee and Board of Directors (where applicable) before publication, and may be shared with third party contractors where required.

The key point of contact/responsibility is held by Chief Executive as the Responsible Person. In the absence of the Chief Executive those persons holding qualifying positions will take responsibility for any escalation process and decision making.

This Customer Complaints and Dispute Policy and Procedure has been written in line with the implementation of social responsibility code provision 6.1.1 -

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Complaints and Disputes as set out in the Gambling Commissions Licence Conditions and Codes of practice (LCCP).

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