



Business Continuity Policy

Policy Statement

The Trust is committed to a crime free and fair and open approach to gambling and is committed to operating responsibly.

This document outlines the business continuity plans should the Trust's Personal Management Licence (PML) holder be absent at the point that a related draw is to be promoted or undertaken.

Definitions; by absent, this is defined as unavailable due to being unable to make direct contact and/or, mentally or physically incapable of fulfilling the key responsibilities aligned to their licensed role in relation to a promoting society.

Policy Headline: The Trust's PML holder must be present when a draw is being promoted

Policy Context

While not a requirement of the LCCP to have more than one PML or Annex A, the Gambling Commission advises that a promoting society should consider more than one PML or Annex A holder. In the absence of a second key responsible person, the Gambling Commission would seek reassurances for a process that ensures business continuity with the appropriate safeguards in place.

Process

The PML holder must be aware of periods where direct contact is not possible and ensure these do not coincide with a draw being promoted by the Trust.

- If for any reason, absence is unavoidable and for which advance notice is not possible then, the following will be implemented;

- a. notification to Executive Manager and the Trust's ELM; and,
- b. consideration given to rescheduling draw promotion or related activity provided that an acceptable notice period to players is possible.
- c. If draw is imminent, then discussions will take place with the ELM on possible scenarios such as draw date changed and notification to players or draw cancelled and notification to players

A key event to the Gambling Commission must be submitted if the sole PML absence coincides with an imminent draw.

Considerations

The Chair of the Trust is a PML holder. Currently the maximum number of draws for the Trust

that can take place in a year is three. Given the infrequency of draws, the risk associated with

a PML holder being absent is low.

The Board acknowledges that if at any one time the Trust retains just one Personal Management Licence holder, this does create a level of risk. This will be considered as part of

the review of the Risk Register at board meetings and discussions about a second PML/Annex A holder may be taken forward.

Review

This policy is reviewed annually by the Risk and Audit Committee.

Last reviewed: June 2017