

# CONSUMER PROTECTION STRATEGY

CAMELOT

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**Extraordinary things happen when a lot of people play a little. National Lottery games should always be fun, playing in a way that is right for you. We're here, supporting you so that you're always in control of your play.**

## Introduction

We are committed to maximising returns to society, including supporting Good Causes, in a responsible way, with a lot of people playing a little. Our main priorities are the prevention of under age play and excessive play. Our Consumer Protection Strategy is an important element of our overall business strategy. It sets out how we aim to achieve our ambitions by creating safe online and retail environments to play in, designing games in a responsible way and promoting Healthy Play.

The fact that The National Lottery is ranked just 59th in the world in terms of per capita spend, despite being the fifth largest lottery in the world in terms of sales, underlines the effectiveness of our approach to date in this area. You can review all the progress we have made in our latest Annual Report.

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## Our Ambitions

**To be the safest place to play**

**To promote Healthy Play**

We do this by focusing on:

### Player

To prevent underage players from accessing National Lottery products, and to detect and interact with at-risk players to minimise excessive play.



### Product

To design games that are lower risk and don't have a particular appeal to vulnerable groups, or those under 16, through a rigorous game design process.



### Place

To create controlled play environments (online and in retail) and promote Healthy Play habits to all players.



### Leadership

To take a leading role in advancing Consumer Protection practices.



## Player



- Healthy Play messaging plays a prominent role in our online player journey. This starts with our welcome email, through to our online toolkit encouraging players to stay in control of their play, through setting spend and play limits, session time reminders, taking time out or choosing to self-exclude from individual or all games.
- Players can also use our online budget calculator to anonymously and confidentially assess their affordability to play and can use a self-assessment tool to find out what kind of player they are. A full list of our online tools can be found on our [website](#).
- With millions of people playing the National Lottery online via our website and on our Mobile Apps, we take online consumer protection seriously. Online we use a behavioural analytics model to spot patterns of behaviour that suggests a player is at-risk of playing excessively. We send these players targeted communications to encourage a positive change in behaviour. We continue to review and update the interventions to ensure they are effective in preventing excessive play and encouraging Healthy Play.
- We may suspend particular groups of players who are identified as at-risk, as well as players who have been identified as at-risk for a longer period of time.
- Those requiring support or treatment are made aware of the options available to them by raising awareness through our communications channels, Contact Centre colleagues and on our products. This includes signposting to supportive organisations and informing them of our online tools that can help them stay in control of their play. We also engage with, and support, organisations addressing problem gambling in the UK, including [GamCare](#) and [GambleAware](#).
- As well as being a time of extreme excitement and happiness, suddenly winning a substantial sum of money can be an overwhelming and emotional experience for many people. We have a complete support package in place for all high tier winners which includes a dedicated Winners' Advisor, Private Banking, Financial and Legal advice and access to a Life Coach.
- Winners benefit enormously from practical advice like making wills and managing their finances but the win also enables them to enjoy new experiences and create special memories with their loved ones.
- We really want our winners to enjoy their prize, so they also have access to a Lifestyle Management/Concierge company to aid them with their life-changing transition.
- We are committed to ensuring our site is accessible and usable for all abilities and disabilities. Our website is built in line with accessibility best practice and is accredited by AbilityNet. Find out more [here](#).
- In retail, our mystery shopper programme has helped us gain assurance that retailers have effective safeguards in place to prevent underage play. We retain the right to remove the retailer's terminal and terminate their retail agreement at any time for failing to implement sufficient safeguards.
- All our products and advertising display age restrictions.

## Product



- We have a robust Responsible Game Design Process in place to ensure that the games we design are safe to play. This process is overseen by our Game Risk Evaluation Team, with representatives across Camelot and the process is reviewed each year to ensure it is effective, adding enhancements where necessary.
- All games are risk-assessed, ensuring that they are responsible in their design. We use GamGard, a tool which assesses the risk levels of a game's structural and situational characteristics, and a risk checklist to identify any further risks posed by the game; for example, ensuring that the design doesn't have a particular appeal to children. Following a review of our game design process to identify ways in which it could be enhanced, we introduced the use of a second game risk assessment tool - Asterig - and updated our risk checklist to account for additional risk factors. This is complemented by enhanced research and review for games that are significantly new and different.
- If any of these tools identify a risk level which is too high, we will either revise the game and/or our marketing approach. If the risk remains too high, we will not launch the game at all.

- All relevant teams receive annual training on game design and advertising to ensure games are designed, marketed and advertised in a way that supports our ambition to promote Healthy Play.
- We are committed to ensuring that our employees understand our commitments to consumer protection and support them in their daily operations, with extra training for those in direct contact with players. For example, all Contact Centre employees are trained on how to spot signs of excessive play and what to do as a result, as well as receiving monthly Healthy Play knowledge tests.
- All of our advertising and marketing is checked to ensure it complies with the Advertising Standards Authority [CAP Code](#) and [BCAP Code](#). The Codes promote safe marketing, in particular the need to prevent young people under 18 from being harmed by any unsafe advertising.
- Targeting to anonymous players (those not logged into an account) is only carried out if the user has agreed to Camelot's marketing cookie being placed on their browser. National Lottery account holders are able to opt in and out of personalisation via their account settings. All communications with National Lottery players are in line with the Data Protection Act 2018 and PECR.
- Online we have a rigorous registration process with age verification checks to ensure players are 16+.

## Place



- Our ambition is for lots of people to play a little. To remind our players of how we want them to play, we launched our new Healthy Play messaging [DREAM BIG play small](#) in 2019. This is currently featured on media screens in Retail, Draw-based games tickets, Scratchcard advertising and our [website](#).
- We provide information and training to all National Lottery retailers through our Being a Responsible Retailer training programme. This sets out our requirements and expectations on how to prevent underage play and support Healthy Play. This is communicated through a range of leaflets, information packs, terminal messaging, terminal printouts, articles in our bi-monthly Jackpot magazine, face-to-face visits and telephone calls.
- Our new Supporting Healthy Play training programme was rolled out in January 2019 to all National Lottery retailers with simplified guidelines and training to ensure retailers have an understanding of excessive play and the right tools to be able to support players if appropriate, such as a terminal printout signposting to GamCare and our Healthy Play Page.
- We continue to evaluate the effectiveness of our retailer training programme to improve retailer confidence and understanding.
- Retailers have been trained to advise and provide information to players, including Games Rules
- Our Players' Guide is available at retail outlets and on our [website](#), outlining our approach to Healthy Play and includes the [GamCare](#) helpline details
- Through online personalisation, we have increased healthy play messaging to players identified as at-risk and removed from the National Lottery home page the promotion of Instant Win Games to these players.

## Leadership



- We have contributed on consumer protection developments through industry working groups including leadership roles with the European Lotteries (EL) and World Lotteries Association (WLA))
- We hold the highest levels of [EL Responsible Gaming Standard](#) and [WLA Level 4 Responsible Gaming Certification](#), and have been certified against both for over 10 years, recognising our commitment to continuous improvement.
- This year we have been awarded Advanced Level 2 of the [GamCare Safer Gambling Standard](#), a social responsibility quality standard for licensed gaming operators. It aims to increase overall standards of social responsibility practice across the industry, helping to make play safer for all.

- We also support the [Gambling Commission's National Strategy to Reduce Gambling Harm](#).
- Research is fundamental to improving our understanding of and approach to unhealthy play. We support independent research, studies and conferences that contribute to the wider understanding of problem gambling. This includes an annual contribution to GambleAware, an independent charity that funds research, education and treatment services to help minimise gambling-related harm in Great Britain.
- All employees are required to complete a Healthy Play module each year, together with/supported by on-going awareness driven through our internal communications channels and as part of our induction programme for new employees.