



# CONSUMER PROTECTION STRATEGY

## Preventing Excessive and Underage Play and Promoting Safe Play

### Introduction

Camelot is committed to maximising returns to society in a responsible way. Our main responsibility is the **prevention of underage play, prevention of excessive play and safety** for all players and non-players.

This strategy is an important element of our overall business strategy. It sets out how we aim to achieve our goals through providing a safe gaming environment, both online and in retail, and how strict responsibility guidelines aid the development of National Lottery games so that they are safe to play.

We aim to maintain clear differences between National Lottery games and those developed by gambling organisations, so that players continue to consider the National Lottery an activity which is fun, low risk and culturally acceptable. Our games encourage a lot of people to play a little, have robust measures to protect consumers, and show a clear link to National Lottery Good Causes.

This strategy is aligned with the [European Lotteries Association \(EL\)](#)  Responsible Gaming Standard and the [World Lottery Association \(WLA\)](#)  best practice guidelines and certifications. Camelot has been awarded the highest level of accreditation by the WLA Responsible Gaming Framework (Level 4) which recognises our commitment to continuous improvement in Consumer Protection. All our responsible play initiatives have been rigorously audited in line with the EL Responsible Gaming standard.

You can look at the progress we made during 2016/2017 in our [Corporate Responsibility Report](#) .

### Our Focus

**Underage Play Prevention** Deter the sale of National Lottery products to people under the age of 16 and discourage underage play in any form.

**Preventing Excessive Play** Promote and support positive, non-problematic play to all players, and prevent the misuse of National Lottery products.

**Safety** Ensure that consumer safety is at the core of the design, development and distribution of National Lottery products, and that all consumers are able to make informed choices about play and support services.

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## Our Commitments

### Research

Camelot supports independent research, studies and conferences that contribute to the wider understanding of problem gambling. We use online player data to establish definitions of healthy and problem play which helps us understand triggers of problem play and fraud. Research is fundamental to improving our understanding of and approach to problem gambling. Camelot has also increased its annual contribution to GambleAware, an independent charity that funds research, education and treatment services to help minimise gambling-related harm in Great Britain.

### Staff training

All Camelot employees are trained to understand our commitments to Consumer Protection and support them in their daily operations, with extra training for those in direct contact with consumers. 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 Player Protection knowledge tests. Regular on-going awareness is driven through our internal communications channels.

### Retailers

Camelot provides information and training to National Lottery retailers about their responsibilities towards Consumer Protection issues via regular retailer training, our bi-monthly retailer magazine 'Jackpot', and with posters and stickers for their shops. We continue to explore ways in which we can strengthen the prevention of excessive play in retail, and our mystery shopper scheme and a sales refusal register help us gain assurance that our safeguards to prevent underage play are effective. We retain the right to remove the retailer's terminal and terminate their retail agreement at any time for failure to implement sufficient safeguards.

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Each year we strive to improve our underage mystery shopper scheme to better target our testing, and improve support for retailers. During 2017/18, through research, we are looking at how we can better understand what problematic play looks like in retail, and what additional support our retailers may need.

## Digital

Camelot's digital platforms offer protection to players from excessive and underage play. A rigorous registration process incorporating age verification checks is key to this protection. Once the player is authorised they are provided with information and tools to help them make informed decisions about their play, manage their experience and avoid excessive play. These tools include things such as account limits, play limits, wallet load limits, session time reminders, online self-exclusion and short-term breaks. A full list of tools can be found on [The National Lottery](#) website.

We aim to encourage more players to use our online control tools, which are positioned prominently on our website to make them more accessible. During the period when players are still new to playing online we will include further messaging about Responsible Play to maximise effectiveness.

Using a behavioural analytics model created by Camelot's data scientists, we try and spot patterns of behaviour that may amount to problem play. Alongside this, we have been trialling different methods to see what is most effective at changing player behaviour over time. We will be able to use our learnings to continuously improve our model and the way in which we approach player protection. We will continue to review the interventions to make sure our players continue to have fun, with all the tools necessary to make sure they can stay in control of their playing habits.

Our digital platforms undergo an annual independent review by GamCare, providing assurance that we are compliant with good practice in consumer protection and helps inform the evolution of our consumer protection strategy.

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. For more information [click here](#).

## Game Research and Design

We have a robust Responsible Game Design Process in place to ensure that we design games in a responsible way, ensuring they do not encourage problem play and are fun to play. The process is overseen by our Responsible Game Design Governance Group, with representatives from across Camelot.

All games are assessed for their level of risk, ensuring that they are not irresponsible in their design and reducing the risk of them leading to problem play. We do this through:

- Gamgard, an online tool which assesses the risk levels of a game's structural and situational characteristics.
- Risk Checklist, which assigns a risk level to the design characteristics of the game, ensuring, for example, that the game isn't of particular appeal to anyone underage.

If either tool identifies a potential risk to players, we will either revise the game and/or our marketing or, if the risk is too high, we will not launch the game at all. Once launched, games are reviewed against the predictions of the assessment tools to assure their effectiveness and inform changes to the game development process. Every year, Camelot reviews the process to ensure it is the most effective it can be.

## Public Information and Education

Camelot's aim is that all players and non-players can make informed decisions about National Lottery games. We use a variety of platforms to reach our players and provide them with the right information about responsible gaming. For example:

- All National Lottery products display the [GamCare](#) helpline details, the odds of winning, and age restrictions.
- Our retailers have been trained to advise and provide the information to players, including Games Rules.
- Our Players' Guide, available at retail outlets and The National Lottery website, outlines how to play responsibly.
- Our [Corporate website](#) has tools to help players understand their playing behaviour and its impact on themselves and others.
- On [our website](#) we highlight common Lottery scams so that we uphold the integrity of our brands.

## Advertising and Marketing

All of our advertising and marketing continues to be checked by relevant teams at Camelot, including our Legal team, to ensure it complies with the Advertising Standards Authority CAP Code and BCAP Code, both of which apply to us. The Codes promote responsible marketing, in particular the need to protect young people under 18 from being harmed by any irresponsible advertising.

## Support and Treatment for Problem Gamblers

We continue to strive to ensure that all consumers requiring treatment are aware of the options available to them by raising awareness through our communications channels, Contact Centre colleagues and on our products. We engage with organisations addressing problem gambling in the UK through GamCare and [GambleAware](#).

### Support for Winners

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 dedicated team of Winners Advisors who can provide appropriate sources of legal and financial advice for winners of £50,000 or more. For winners of over £1m, a private banking representative can visit them at home, and we also arrange for a panel of independent legal and financial experts to offer impartial advice. To aid the winner with their life changing transition a life coach is also available.

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 Players must be 16 or over and physically located in the UK or Isle of Man.

[Feedback](#)

#### Useful links

- [Help & contact us](#)
- [Help videos](#)
- [About us](#)
- [Sitemap](#)
- [Responsible Play](#)
- [Accessibility](#)
- [Account Terms & Rules](#)
- [Security](#)
- [Privacy Policy](#)
- [Cookies](#)
- [Service Guide](#)
- [Disclaimer](#)
- [Syndicates](#)
- [Careers](#)

#### Keep it fun

You can set your own [play and spend limits](#), if you like. We're all about being fun but responsible. [Take a look](#).



We're accredited by GamCare for our high standards in player protection and social responsibility. [More about GamCare](#) 



#### Follow us



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\* [Lotto](#) and [EuroMillions](#) jackpots are estimated.

Σ The European Millionaire Maker Prize is €1,000,000 which, for UK winners, will be converted to Sterling and topped up by Camelot so that the total prize awarded is £1,000,000.

‡ 1 in 4 is an average based on the odds of winning across all GameStore Scratchcards and Instant Win Games as of 3rd January 2017.

† Based on a total prize value of £258,533,749.75 on National Lottery Instant Win Games between 1st Aug 2016 and 30th Sept 2017.

∞ Calls to 0844 numbers cost 7p per minute plus your service provider's access charges. Calls to 03 numbers cost no more than calls to 01 and 02 numbers. See [contact us](#) for telephone numbers.

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