

Responsible Play Report 2017

1. Introduction

2017 was the third full year of operating the National Lottery for Premier Lotteries Ireland DAC (PLI). Under the Licence to Operate the National Lottery, the “**Licence**”, PLI is required to operate the National Lottery in a manner that “*prevents problem play*”. In addition to the specific requirements set out in Schedule 9 of the Licence, with which PLI complies, PLI is committed to implementing a player protection framework that reaches all areas of the business, so that player protection is a key principle operating behind all business activities. Consistent with its Policy Statement on Player Protection, PLI’s ambition is to be a recognised leader in its approach to player protection and responsible play.

2. Player Protection Policy

PLI’s policy is to ensure that the interests of all our players are protected, that no National Lottery Game encourages excessive play and that, in accordance with the terms of the National Lottery Act 2013, all reasonable measures are implemented to ensure that National Lottery products are not sold to persons less than 18 years of age.

PLI is committed to maximising returns to society in a responsible way. PLI’s vision is for a National Lottery that operates in a socially responsible way, providing exciting and life-changing lottery games that bring fun and entertainment to everyone. This means balancing the fun with ensuring as far as possible that individuals play within their means and that the vulnerable and persons less than 18 years of age are protected.

The National Lottery is the national game, predicated on the basis of many people spending modest sums, rather than depending on a few people spending large amounts.

3. Player Protection Principles

Our Player Protection Policy is consistent with the requirements of the World Lottery Association Responsible Gaming Framework and the European Lotteries Responsible Gaming Standard. PLI was re-certified to both of these standards in May 2017. The principles which underpin these standards and which guide our approach to player protection are as follows:

- a) Take reasonable and balanced measures to meet our objectives while protecting the interests of our players and vulnerable groups and ensuring as far as possible the prevention of underage play and excessive play;
- b) Develop our practices concerning responsible gaming-related issues based on available relevant information and appropriate documented research, as well as drawing on industry best practices;
- c) Work with stakeholders to promote responsible gaming as broadly as possible;
- d) Promote only legal and responsible play in all aspects of our activities, including the development, sales and marketing of our products and activities; and make reasonable efforts to ensure our retailers do the same; and

e) Provide the public with accurate and balanced information to enable informed choices to be made about their play behaviour, and to provide them with the necessary tools to protect themselves. This commitment requires the following:

- Marketing of National Lottery activities and products in a way which promotes responsible play practices and informed choices;
- Utilising robust measures to protect consumers;
- Showing a clear link between the National Lottery and Good Causes;
- Ensuring that information about responsible play is available to all individuals;
- Promoting the implementation of responsible play practices in all aspects of our activities, and the activities of our retailers;
- Ensuring all of PLI's products are endorsed with the *"Play Responsibly, Play for Fun"* message;
- Including a dedicated *"Play Responsibly"* section on the website;
- Including promotion of responsible play as part of our retailers' contracts;
- Including play limits online in accordance with the Licence;
- Providing the public with accurate and balanced information to enable informed choices to be made about their play activity. There are a variety of platforms used to reach our players and provide them with the right information about responsible play. For example:
 - *"How to Play"* information includes the odds on winning for each National Lottery Game;
 - *"Play Responsibly"* leaflet, available at retail outlets and on the website, includes information about how to identify potential addictive behaviour and provides contact details for external support systems;
 - The *"Play Responsibly"* section of our website contains useful information about probability and odds, explanations of common gambling myths as well as a link to a self-assessment tool which players can use anonymously to determine what type of player they are;
 - On our website, there is a section on Internet Safety, which highlights common scams so that the integrity of the brand and players' interests are further protected; and
 - All retailers can advise and provide Game information to players, including Game Rules; and
- Monitoring and, as appropriate, revising established activities and practices related to responsible play.

4. Game Development

As part of the game development process, safeguards are built in to ensure we are implementing the best measures available to protect our players.

PLI uses two tools to assess the potential risk a game might pose for vulnerable players:

- GAM-GaRD, developed by Nottingham Trent University, evaluates those aspects of a game that could cause problems for a vulnerable person. These include ease of access to games, how often they can be played and jackpot size; and
- ASTERiG – measures the possible dimensions of risk potential of gambling products on the basis of numeric scores.

If the results of these assessments or other safeguards show that a game might pose an unacceptably high risk to our players, PLI will either revise the product or review additional factors, such as its advertising and marketing strategy relating to the product. If this does not satisfactorily reduce the risk posed, PLI may not proceed with the game.

5. Marketing and Advertising

PLI's marketing support for the National Lottery must comply with the Advertising and Marketing Code of Practice, which seeks to protect consumers.

This Code of Practice operates in conjunction with:

- The current Code of Standards for Advertising, Promotional and Direct Marketing in Ireland set out by the Advertising Standards Authority for Ireland;
- The General Advertising Code set out by the Broadcasting Authority of Ireland;
- Code of Professional Practice for Public Affairs and Lobbying set out by the Public Relation Institute of Ireland;
- The National Lottery Act 2013; and
- The National Lottery Social Media Guidelines.

6. Retail

We have an excellent relationship with our retailers throughout the country and we work closely with them to ensure understanding of our commitment to player protection and the importance of selling our products responsibly.

We provide training and information to our agents about their responsibilities towards consumer protection. On appointment, each new retailer receives training prior to signing the Retailer Agreement. This agreement captures all obligations pertaining to the Retailer-PLI relationship referenced in the Act and the Licence, including the retailer's obligations in respect of responsible play and prevention of sale of National Lottery products to minors.

Field Sales Representatives (FSRs) must complete a checklist during visits to retailers. This includes verifying that the appropriate player protection and age control point of sale items are in place.

Over 18s signage is available in-store and distributed on appointment. This highlights age control and the prohibition on underage play.

In November 2017, PLI launched a new portal website specifically for our retailers. This allows retailers to access up-to-date information and support services across a wide range of areas including:

- Virtual Training Academy - an area where all training materials, including video clips helping identify markers of harm can be accessed and viewed;
- Regulatory & Compliance – central repository for required compliance materials including codes of practice, game rules, responsible play guidelines and training programs.

This portal is supported by an app, through which retailers can be messaged directly with regard to responsible play messages.

The Star Game News, which is available in-store, is a bimonthly publication to each retailer which gives details of new game announcements, end game announcements, stock cards and general housekeeping prompts, including in relation to player protection guidance.

The Star Store Brochure is also available in-store. This brochure urges excellence in retail while observing the Player Protection Policy, procedures and guidelines.

Terminal messaging is an efficient mode of communication, which has the capability to target and reach the entire Retail Network. It is used to deliver urgent messages as well as compliance and promotional messaging.

Agent Council

The Agent Council members are retailers who have been nominated by their respective retail representative bodies including RGDATA, CSNA, NRFN and IPU.

The Agent Council meet on a quarterly basis to facilitate the exchange of information and ideas. Endorsement from the Agent Council on new initiatives carries significant weight and has been critical to the successful implementation of a number of key projects.

Management at PLI work closely with the Agent Council establishing a highly productive forum which is essential to the management of PLI's relationship with its retail partners.

As appropriate, PLI will promote responsible play and player protection measures with the Agent Council, including exploring new and effective ways of working with retailers to prevent excessive and underage play.

7. Online

In-keeping with PLI's ethos to provide players with the information and resources to play responsibly and make informed choices, PLI has implemented a host of measures for our online players.

Registration

All Games (including trial Games) are only accessible after registration. In order to register and operate an interactive online account, a person must:

- Confirm they have read the Interactive Terms & Conditions;
- Confirm that they are legally resident in Ireland; and
- Confirm their date of birth. If the date of birth indicates that they are under 18 years of age then no account can be created.

There are also strict controls in place to prevent the operation of duplicate online accounts. PLI checks the status of accounts on a daily basis to ensure the controls are working effectively.

Spending Limits

PLI imposes daily, weekly and monthly spending limits for online players, as follows:

PERIOD	LIMIT
Daily	€75
Weekly	€300
Monthly	€900

A player can choose to self-impose a lower limit to the ones prescribed by PLI. A revision downwards will be effective immediately, while an upward revision of a limit will require a wait of 24 hours before it takes effect. This function is prominently placed on our website, and is also presented to online players on registration. PLI is also planning to implement a new measure whereby online players are reminded of this function at a minimum of every 26 weeks.

PLI also has in place an online account balance limit of €750. Once the online account balance exceeds this amount, a player will be prevented from purchasing another game. In order to continue to play, the account owner must reduce the wallet balance below this amount. Any amount withdrawn will be paid by cheque.

Wallet withdrawals over €200 and prize claims over €500 are subject to I.D. verification checks. Players are required to provide passport or driver's licence before the withdrawal will be authorised. The withdrawn amount will always be paid by cheque.

Self-Exclusion

A player can choose to lock themselves out of any or all Interactive Instant Win Games. This is in line with industry best practice and is supported by leading academic research. The minimum period of self-exclusion is two days.

The following self-exclusion facilities are also available to players:

- All Games – Minimum 6 months

If a player chooses this option their account will be closed for a minimum of 6 months and the balance in their online wallet will be returned. They will receive no marketing communications for the period of their elected exclusion.

- All Games – Minimum One Month (“Take a Break”)

If a player chooses this option their account will be suspended for a period of one month. The balance in their online wallet is returned to them and they will receive no marketing communications for the period of their exclusion.

If a player elects to self-exclude, there is no limit to the amount of time for which they can remain excluded. It will be a matter for players to make contact with the National Lottery if they wish to re-activate their account. When the exclusion period ends, should a player wish to re-engage, they are required to speak with a trained member of staff in our Contact Centre, who will ask them some questions to ensure they are not potential risk players.

Account History

Players are able to view their transactions online by clicking on “*Manage my Account*” section of the website. Players can access data relating to their previous ninety days play, or more if requested.

8. Prize Payment Controls

All cheques issued to online players are sent to the name and address contained in the player’s profile. All cheques are stamped “Account payee only”.

Unless previously verified, winners of prizes between €501 and €9,999 are contacted by the National Lottery to verify their age and identification details before their prize is paid. These winners are required to complete a Claim Form and to return proof of age (passport or driver’s licence) along with their Claim Form to the National Lottery who will verify that the winner is over 18 years of age prior to issuing any prize payment.

Winners of prizes of €10,000 or more must present themselves at National Lottery HQ where their age and identification details are verified before a cheque is issued.

PRIZE TIERS	PRIZE AMOUNT	PAYMENT ARRANGEMENTS
LOW	€1 – 99	Email Notification Prizes automatically transferred to player’s online wallet
	€100 - €500	Email Notification Cheque automatically sent by post to winner’s registered address
MID	€501 - €9,999	Winners are contacted to verify their age and identification details and sent out a claim form for completion before a cheque is issued.

HIGH	€10,000 +	Winners must present themselves at National Lottery HQ where their age and identification details are verified before a cheque is issued.
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Verification of Identity

PLI reserves the right to request proof of age documentation from time to time during or after registration from any applicant or player.

In addition to the checks that are undertaken in the prize claim process, all wallet withdrawals over €200 are subject to age and I.D. verification checks. PLI also conducts spot checks of a number of players' accounts every month.

The company has put in place a system to close an account and return any unutilised funds in the account should a player, subsequent to registration, be identified as underage.

9. Support for Winners

PLI has a procedure in place to protect the identity of a person who has won a prize in a National Lottery Game. PLI at all times respects the wishes of every prize winner as to whether they wish to remain private or go public in relation to their win.

While the location of the retailer who has sold a winning ticket is released after each jackpot draw (except in cases of large Jackpots (over €10m), where generally the location of the selling agent is not revealed for a couple of days, together with the date of purchase. However, to further protect the winner's identity, PLI does not release information indicating the time that a winning ticket was sold by a retailer.

Further to this, there is a prohibition on giving any inducements to prize winners to agree to disclosure of their identity. If a winner does decide to speak publicly about their win, PLI Public Relations team manages the press conference and advises each winner on what to expect from the media, and the subsequent media process. Any subsequent requests for photographs or interviews with the winner will be handled by PLI Public Relations team, with the consent of the winner.

For all jackpot prizes, counselling services are provided in the form of an advice booklet and DVD. The topics covered include:

- Getting used to your win
- Choosing your advisors
- Money dos and don'ts
- Legal and financial
- How does it feel to win the lottery?
- Making a difference

10. Support for Problem Play

PLI wants all players to be aware of the support services available to them or a relative, should they require them. Those who need to talk to someone about problem play are directed by our Contact Centre or retailers to contact www.gamblersanonymous.ie or telephone Gamblers Anonymous Dublin on (01) 8721133, Cork 087-2859552, Galway 086-3494450, Tipperary 085-7831045 or Waterford 087-1850294/ 086-2683538.

PLI also provides on its website a dedicated email address for players who might be experiencing difficulties with their play behaviour. These messages are responded to by an external individual who specialises in addiction therapy.

11. Player Protection Panel

A key element of our Player Protection Policy was the establishment of a Player Protection Panel.

The Panel meets monthly and is made up of: Head of Marketing, Head of iLottery, Head of Corporate Affairs, Legal & Regulatory Affairs Specialist, Security & Compliance Manager, Retail Compliance Manager, Contact Centre Manager and the CSR & Regulatory Affairs Support Officer.

The aim of the panel is to:

- Maximise player protection
- Minimise the risk to vulnerable players
- Review player behaviour
- Develop strategies and approaches to minimise the risk of excessive or underage play
- Monitor industry best practice

The Panel is responsible for ensuring that PLI applies the following four operational principles:

- *Game design and promotion* – use of 2 industry leading risk assessment tools used to gauge player protection issues; and ensure advertisements and promotional materials do not target those under 18 years of age
- *Operator interventions* – responsible play messaging on every page, signposting to gambling care resources, spending limits, age verification checks
- *Customer tools* – customer-led deposit limits, self-exclusion options, player dashboard for greater visibility of time spent logged in and wallet balance, player history showing all player spend
- *Behaviour analytics* – to better understand customer play patterns and excessive play triggers

The Panel will use the following ten key areas to drive PLI's Player Protection Strategy and activities:

- Research

- Employee training
- Retailer/ Sales Agent training and communication
- Game design
- Remote gaming channels
- Advertising and marketing
- Treatment referral
- Consumer education
- Stakeholder education
- Reporting, measurement and certification

In-keeping with PLI's dedication to player protection, we also assess on a quarterly basis various different aspects of online play patterns. Data which might signal potential problem play is captured, and deeper analysis might be carried out based on an individual's play and spend patterns. Assessment takes account of frequency of play and frequency of limit hits as well as industry recognised "markers of harm" such as loss chasing, multiple wallet uploads and greater spend on instant win than draw based games. Depending on our assessment, a player in this group will either be monitored on an ongoing basis or will be sent a responsible play communication, which will provide them with useful information about how to control their online play, as well as the various resources available to them should they require specialist support for themselves or someone close to them.

The area of player protection is relatively new, and is considered across the industry to be still in its infancy. At the National Lottery, we are always seeking new ways to improve on our existing safeguards and we make every effort to be best in class when it comes to responsible play. PLI recognises that player protection is not a standalone matter and to this end, we strive continually to ensure that player protection measures form a part of our business strategy and planning. As time goes on, our Player Protection Strategy is likely to change and evolve in line with new emerging research and best practice in responsible play.

12. STAKEHOLDER ENGAGEMENT

In-keeping with PLI's commitment to responsible play, a key objective for 2017 was to engage with our stakeholders in a meaningful manner to ensure that all views are considered in growing the business in a responsible and sustainable manner. PLI strives to maintain player protection at the heart of all of its business activities, while maximising the generation of funds for good causes. As well as its board of directors and staff, PLI's engagement relating to responsible play initiatives has included interaction with the Department of Public Expenditure & Reform, Ministers, Senators & TDs, the Regulator of the National Lottery, external consultants and service providers, retailers, press, players and Business in the Community.

PERFORMANCE REVIEW

The following is an updated report on our KRA 2017

KEY RESULT AREA	OBJECTIVES	TARGET DATE	RESULT
EL Responsible Play Standard	Retain certification following audit in April 2017	Q2	Achieved
World Lottery Association Accreditation	Retain certification following audit in April 2017	Q2	Achieved
Website	Achieve independent responsible play certification for website	Q2	Deferred due to ongoing development of website
Retail Agent Communication & Training	Retail Portal Launch	Q1-Q2	Achieved in Q4
	Continue to provide Responsible Play induction training for all newly appointed retailers	Ongoing	Achieved. All newly appointed retailers received Responsible Play induction training
	Biannual communication on responsible play issues	Q2 & Q4	Achieved: Ongoing
Player Education	Provide updated 'Responsible Play' information to players on the PLI website	Ongoing	Achieved: Ongoing
	Review and Update Responsible Play Leaflet as appropriate	Q3	Achieved: Q1 2018

Research	Monitor opportunities to participate in any relevant research	Ongoing	Achieved: Ongoing
Policy Statement	Review and update Responsible Play Policy Statement as required	Q4	In progress
Stakeholder Engagement	Review stakeholder engagement process	Q4	Achieved: PR strategy in place and updated regularly.

KEY RESULT AREAS – TARGETS/OBJECTIVES 2018

KEY RESULT AREA	OBJECTIVES	TARGET DATE	RESULT
EL Responsible Gaming Standard	Ongoing monitoring of compliance with the standard	Q1 to Q4	In progress
World Lottery Association Accreditation	Ongoing monitoring of compliance with the standard	Q1 to Q4	In progress
Website/App	Enhanced online player protection controls	Q4	In progress
Retail Agent Communication & Training	Enhanced retail communication and compliance through Retail Portal Phase II	Q3-Q4	In progress
	Continue to provide Responsible Play induction training for all newly appointed retailers	Ongoing	Ongoing
Player Education	Provide updated 'Responsible Play' information to players on the PLI website	Ongoing	Ongoing

Research	Monitor opportunities to participate in any relevant research	Ongoing	Ongoing
Corporate Social Responsibility	Initiate 'The Mark' certification for businesses working responsibly	Q3	Baseline review scheduled for September.