

## Responsible Play Report 2018/19

### 1. Introduction

2018 was the fourth full year of operating the National Lottery for Premier Lotteries Ireland DAC ("**PLI**" or "**the Company**"). 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

It is PLI's policy 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 ("**the Act**"), 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. As set out in the Company's Vision Statement, we want to provide exciting and engaging lottery games that bring fun and entertainment to everyone, while 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 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. As part of the certification process to obtain these standards PLI underwent a successful continuous assessment audit in September 2018. 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 Lottery activities and products in a way which promotes responsible play practices and informed choices;
- Compliance with the standards of the Advertising Standards Authority for Ireland, which cover activity in both print media and on broadcast channels and include provisions for protecting consumers;
- Utilising robust measures to protect consumers;
- Showing a clear link to 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 agents;
- 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;
- Commissioning regular Mystery Shop campaigns;
- 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 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 Responsible Play section of our website contains useful information about probability and odds, common gambling myths as well as a self-assessment quiz which players can use anonymously to determine what type of player they are;
  - On our website, there is a section highlighting common lottery 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, the outputs of these tools have developed over time, giving more understanding of individual games:

- 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 a risk to our players, PLI will either revise the product or review additional factors, such as its advertising and marketing strategy. If this does not satisfactorily reduce the risk posed, PLI will not proceed with the game.

## 5. Marketing and Advertising

PLI's marketing support for the National Lottery, which seeks to protect consumers, must comply with the Advertising Code of Practice which in line with Licence obligations must be approved by the Office of the Regulator of the National Lottery ("**ORNL**").

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

PLI has an excellent relationship with its 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 Retailer Agreement is signed on completion of training (which includes age control & verification and player protection) when the retailer is appointed. This agreement captures all obligations pertaining to the retailer-PLI relationship referenced in the Act and the Licence.

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.

FSRs use a mobile technology to take the retailer through the visit, this holds all the necessary information for a successful visit. Once completed the retailer signs off that they understand the information, this is then recorded and stored in the main system for future reference.

Since the introduction of the retail agent portal in 2017 PLI have made further enhancements to make it more intuitive for 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 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.

In 2018 PLI introduced age control technology in a selection of our retail groups. Game barcodes are put on a product restriction (white listing) and this will prompt the cashier, that the product is for 18+ and to ask for ID if unsure.

The Star Game News, which is available in-store, is a monthly publication to each retailer which gives details of new game announcements, end game announcements, stock cards to help manage scratch card stock 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 Council**”)

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

The Council meets on a quarterly basis to facilitate the exchange of information and ideas. Endorsement from the 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 Council establishing a highly productive forum which is essential to the management of PLI’s relationship with its retail partners.

As appropriate, PLI promotes responsible play and player protection measures with the Council, including exploring new and effective ways of working with retailer 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 the Republic of Ireland
- 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.

#### Spending Limits

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

<b>PERIOD</b>	<b>LIMIT</b>
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.

Additionally, PLI has in place a wallet balance limit of €750. Once the wallet balance exceeds this amount, a player will be prevented from purchasing another game. In order to continue to play, the player 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 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 in the name of the registered account holder.

### **Take a break / Lock Games**

**Lock Games** - If a player chooses to lock themselves out of instant win games, they can do this by individual game or from all games. The player can customise the length of time they wish to be excluded, the minimum period of exclusion is 2 days.

**Take a break** – One month, six months, one year, five years, permanent (self-exclusion) If a player chooses to take a break, their account will be closed, and they are unable to reopen before the selected time period has expired. The balance in their online wallet will be returned by cheque and will receive no marketing messages for the period of their exclusion.

Players will not receive any messages from the National Lottery after the end of their period of self-exclusion. It will be a matter for each affected player to make contact with the National Lottery if they wish to re-activate their account. Accounts cannot be reactivated before the end of the relevant self-exclusion period.

### **Account history**

Players are able to view their transactions online by clicking on the "My Account" section of the website. Additionally, players can access financial data through the "Wallet" tab relating to their previous 121 days play.

## **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 winners 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.

### Verification of Identity

#### **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. 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. The account details will be held for a minimum of twenty-four months, blocking the player from setting up a new account.

#### **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 retailer is not revealed until after the prize has been claimed), 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 prize winner does decide to speak publicly about their win, PLI Public Relations Department manages the press conference and advises each prize winner on what to expect from the media, and the subsequent media process. Any subsequent requests for photographs or interviews with the prize winner will be handled by PLI Public Relations Department, with the consent of the prize winner.

For all jackpot prizes counselling services are provided in the form of an advice booklet and a short information film. 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 and/or retail agents to contact <https://dunlewey.net/helpline> 1800 936 725, <https://www.problemgambling.ie/>, the National Gambling Helpline 1800 753 753; [www.gamblersanonymous.ie](http://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.

## **11. Player Protection Panel**

A key element of our Player Protection Policy is the establishment of a Player Protection Panel (the "**Panel**") with the Terms of Reference set out below.

The Panel is chaired by the Player Protection Manager and meets on a monthly basis. The Panel is made up of senior decision-makers from across the business.

The Panel's aims are:

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

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

- *Game design and promotion* – use of two industry leading risk assessment tools used to gauge Player Protection issues; and ensure advertisements and promotional materials do not target those under 18s;

- *Operator interventions* – responsible play messaging on every page, signposting to the relevant support organisations, session clock, time counter, default limits, post-win age verification checks;
- *Customer tools* – customer-led deposit limits, self-exclusion options, a 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 key areas to drive player protection strategy and activities within PLI:

- Research
- Employee training
- Retailer/sales agent training and communication
- Game design
- Retailer training and communication/Mystery Shopper
- Remote gaming channels
- Advertising and marketing
- Consumer education
- Stakeholder engagement
- Reporting, measurement, and certification
- Contribution to the Gamble awareness trust

## 12. STAKEHOLDER ENGAGEMENT

In 2018 we have maintained regular engagement with our stakeholders ensuring that the business continues to expand in a responsible and sustainable manner. Player protection is at the heart of all business objectives, while augmenting funds for good causes remains as a high priority. As well as its Board of Directors and staff, PLI has continued to engage with the Department of Public Expenditure & Reform, Senators & TDs, the ORNL, external consultants and service providers, retailers, press, players and Business in the Community.

### PERFORMANCE REVIEW

**The following is an updated report on our Key Results Areas 2018**

KEY RESULT AREA	OBJECTIVES	TARGET DATE	RESULT
EL Responsible Gaming Standard	Ongoing monitoring of compliance with the standard	Q1 to Q4	Achieved - through the ongoing monitoring by the Panel and verified by KPMG as part of the continuous assessment audit

World Lottery Association Accreditation	Ongoing monitoring of compliance with the standard	Q1 to Q4	Achieved - through the ongoing monitoring by the Panel and verified by KPMG as part of the continuous assessment audit
Website/App	Enhanced online player protection controls	Q4	Achieved – introduced new features, block duplicate accounts, lock individual games, both available on the website and App
Retail Agent Communication & Training	Enhanced retail communication and compliance through Retail Portal Phase II	Q3-Q4	Achieved – information updated and player protection videos on the retail portal.
Induction training	Continue to provide Responsible Play induction training for all newly appointed Retail Agents	Ongoing	Achieved – now part of PLI Business as usual
Player Education	Provide updated 'Responsible Play' information to Players on the PLI website	Ongoing	Achieved – information updated and player protection video on site.
Research	Monitor opportunities to participate in any relevant research	Ongoing	Rolled over to Q1 2019

### KEY RESULT AREAS – TARGETS/OBJECTIVES 2019

KEY RESULT AREA	OBJECTIVES	TARGET DATE
EL Responsible Gaming Standard	Ongoing monitoring of compliance with the standard	Q1 to Q4
World Lottery Association Accreditation	Ongoing monitoring of compliance with the standard	Ongoing

Dedicated Resource, Responsible Play Manager	Subject matter expert to assist with the delivery of the Responsible Play strategy.	In place
Business intelligence Analyst, to analyse data regarding Responsible Play	Continuous learning framework, Identify, engage, analyse, Improve.	in place
Enhanced player activity reports Phase 1	Present a 360-view report of players to Identify players who are displaying at risk behaviours. Engage with players	In place
Enhanced time periods of self – exclusion	Increased time periods for self-exclusions (Take a Break) 1 month, 6 months, 1 year, 5 years, permanent.	In place
Retail Agent Communication & Training	Enhanced intuitive portal to deliver up to date compliance messages and information to the Retail estate.	Q3
	Improved training, Think 21 approach	Q4
Player Education	Easier access on site to Responsible Play information Responsible Play Links at eye level	In place
Research	PLI's planned engagement with Professor Mark D. Griffiths, a psychologist focusing in the field of behavioural addictions, namely gambling disorder, gaming addiction. To give guidance on responsible Play.	Achieved
Player Protection Program Model	Introduction of a machine learning and algorithm to identify at risk players.	Q4