

Lotteries Marketing and Advertising Policy

The advertising of gambling products and services must be undertaken in a socially responsible manner. When considering the Marketing and Promotion of our Lotteries and Raffle, and working with third parties, we must be aware of and ensure that we are compliant with the relevant regulations.

This will all be covered in our Marketing and Advertising training session which will be given to all employees involved with the marketing of licenced activities.

Marketing materials must be checked against the ASA codes, as set out below, for every new campaign, updated campaign and periodically for changes to the codes of practice.

We must pay particular attention to the following sections of the Codes:

UK Code of Non-broadcast Advertising and Direct and Promotional Marketing (CAP Code) ([opens in a new tab](#))

- 3 Misleading advertising ([opens in a new tab](#))
- 8 Promotional marketing ([opens in a new tab](#))
- 16 Gambling ([opens in a new tab](#))
- 17 Lotteries ([opens in a new tab](#))

UK Code of Broadcast Advertising (BCAP Code) ([opens in a new tab](#))

- 3 Misleading advertising ([opens in a new tab](#))
- 17 Gambling ([opens in a new tab](#))
- 18 Lotteries ([opens in a new tab](#))
- 22 Premium-rate telephone services ([opens in a new tab](#)).

For free and paid-for advice on making our advertisements compliant with the Codes we can contact CAP's Copy Advice team ([opens in a new tab](#)). Please also be aware that CAP and BCAP have published its Gambling Consultation update ([opens in a new tab](#)) which includes newly strengthened guidance on the protection of adult audiences and technical updates to the introductory parts of the UK Advertising Codes' gambling.

We should comply with the Gambling industry code for socially responsible advertising ([opens in a new tab](#)) which is administered by the Industry Group for Responsible Gambling (IGRG).

This code is designed to supplement the CAP and BCAP codes by providing minimum industry standards in a limited number of related areas.

The CAP Code requires that marketing communications for gambling must not be likely to be of strong appeal to children or young persons, especially by reflecting or being associated with youth culture, particularly if they are generally available to view by them ('freely accessible'). [Read more about how the ASA views this type of content \(opens in a new tab\)](#).

We must take care with the use of imagery, wording and characters used in marketing communications. Ads must not include a person or character whose example is likely to be followed by those aged under 18 years or who has a strong appeal to those aged under 18, such as sports people and celebrities.

To support our compliance with the advertising rules, CAP's guidance, Gambling and lotteries advertising: protecting under-18s ([opens in a new tab](#)), was released in April 2022.

As a general rule, marketing communications for gambling must not include a child or a young person. No one who is, or seems to be, under 25 years old may be featured gambling or playing a significant role. In all other instances, including social media, under 25s must not feature.

Open and transparent marketing

We must ensure that our marketing communications do not mislead consumers.

All significant terms and conditions which are likely to affect a consumer’s understanding of a marketing promotion must be prominently displayed within the advertisement and positioned close to the headline offer on all relevant landing webpages and sign-up webpages (or equivalent) for that promotion, unless the advertisement is so small that it is impossible to do so.

Significant conditions must be clear, timely, intelligible, unambiguous, non-misleading and transparent. The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

If the significant conditions are not displayed with sufficient prominence, the ad will be seen as misleading. Refer to CAP's guidance on Gambling ads: free bets and bonuses (opens in a new tab) and to the Competition and Markets Authority principles (opens in a new tab) to ensure that all significant terms and conditions relating to promotions are presented in an accessible, clear and transparent way.

Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent.

Whenever a consumer is contacted they must be provided with an opportunity to withdraw consent. If consent is withdrawn then you must, as soon as practicable, ensure the consumer is not contacted with electronic marketing unless the consumer consents again, and you must be able to provide evidence which shows that consent.

LCCP 5.1.11 broadly reflects the relevant requirements of the Privacy and Electronic Communications Regulations (PECR), which are enforced by the Information Commissioner’s Office (ICO). Relevant guidance can be found on the ICO’s website (opens in a new tab):

- electronic and telephone marketing
- guidance on direct marketing
- direct marketing checklist
- guidance on cookies.

Responsible placement of digital adverts

We will not place digital advertisements on websites providing unauthorised access to copyrighted content and must take all reasonable steps to ensure that third parties with whom we contract do similar.

The Infringing Website List (IWL) (opens in new tab), owned by the City of London Police’s Intellectual Property Crime Unit (PIPCU), is an online portal containing an up-to-date list of copyright infringing sites. The aim of the IWL is that advertisers, agencies and other intermediaries can voluntarily decide to stop advert placement on these illegal websites.

Where appropriate, the EIC will consult the IWL.

Key outcomes of advertising and marketing for our lottery and raffle

Code	Code Link	Key Outcomes for activity
CAP code 17 lotteries	<p>https://www.asa.org.uk/type/non_broadcast/code_section/17.html</p> <p>The rules in this section are designed to ensure that marketing communications for lotteries are socially responsible, with particular regard to the need to protect children, young persons under 18 and other vulnerable persons from being harmed or exploited by advertising that features or promotes lotteries.</p>	<ul style="list-style-type: none"> • Over 16 symbol used on all marketing materials • Links to T&Cs are available before play • All marketing copy and images used in advertising to be checked against the CAP

		code to ensure social responsibility.
CAP code 8 Promotional marketing	<p>https://www.asa.org.uk/type/non_broadcast/code_section/08.html</p> <p>The promotional marketing rules apply to consumer and trade promotions, incentive schemes and the promotional elements of sponsorships; they regulate the nature and administration of promotions.</p> <p>Promoters should take legal advice before embarking on promotions with prizes, including competitions, prize draws, instant-win offers and premium promotions, to ensure that the mechanisms involved do not make them unlawful lotteries (see the Gambling Act 2005 for Great Britain and the Betting, Gaming, Lotteries and Amusements (Northern Ireland) Order 1985 (as amended) for Northern Ireland).</p>	<ul style="list-style-type: none"> Any promotional products or prizes must be safe and will not cause harm We do not offer alcohol as prizes for any licensed activity We must specify the number and nature of prizes, if applicable. If the exact number cannot be predetermined, a reasonable estimate of the number and a statement of their nature must be made. All copy and images used in advertising must be checked against the code to ensure relevant for the audience and will not cause harm or widespread offence, by encouraging socially undesirable by encouraging excessive consumption or irresponsible use. All promotions relating to prizes must be transparent and accurate and clearly set out the process of selecting a winner/
CAP code 3 Misleading advertising	<p>https://www.asa.org.uk/type/non_broadcast/code_section/03.html</p> <p>The ASA may take the Consumer Protection from Unfair Trading Regulations 2008 into account when it rules on complaints about marketing communications that are alleged to be misleading.</p> <p>The ASA will take into account the impression created by marketing communications as well as specific claims. It will rule on the basis of the likely effect on consumers, not the marketer's intentions.</p>	<ul style="list-style-type: none"> T&C's are clear before play, which includes and not limited to odds of winning, how prizes are won and how winners will be notified. The cost of entry is clear before play and stated in all marketing materials. The logo, Charity number and address will be present on all marketing materials. Any testimonials from past winners must be used only with permission from the customer.
BCAP code 18 Lotteries	<p>https://www.asa.org.uk/type/broadcast/code_section/18.html</p> <p>The rules in this section are designed to ensure that marketing communications for lotteries are socially responsible, with particular regard to the need to protect children, young persons under 18 and other vulnerable persons from being harmed or exploited by advertising that features or promotes lotteries.</p>	<ul style="list-style-type: none"> Any Radio or TV ads must be cleared through the relevant clearance channels All advertisements must adhere this code and our responsible gambling policy. Our policy is that anyone (other than beneficiary case studies) appearing in advertising must be over 25.
BCAP code 3 Misleading advertising	<p>https://www.asa.org.uk/type/broadcast/code_section/03.html</p> <p>The ASA may take the Consumer Protection from Unfair Trading Regulations 2008 into account when it rules on complaints about advertisements that are alleged to be misleading.</p>	<ul style="list-style-type: none"> T&C's are clear before play, which includes and not limited to odds of winning, how prizes are won and how winners will be notified.

		<ul style="list-style-type: none"> • The cost of entry is clear before play and stated in all marketing materials. • The logo, charity number and address will be present on all marketing materials. • Any testimonials from past winners must be used only with permission from the customer.
<p>BCAP code 22 Premium Rate telephone services</p>	<p>https://www.asa.org.uk/type/broadcast/code_section/22.html</p> <p>The price and nature of premium-rate telephone services must be made clear. Advertisements that include premium-rate telephone numbers or short codes should comply with the Phone-paid Services Authority Code of Practice. For more information on the Phone-paid Services Authority code go to: psauthority.org.uk.</p>	<ul style="list-style-type: none"> • All ads that contain a premium rate telephone number must be cleared by the Phone-paid Services Authority Code of Practice. • All ads must show clearly the pricing of the service. • Our Lottery helpline should be used for customer care purposes.