

Consultation on Society Lottery Reform – Sport and Recreation Alliance Response

Introduction

Q1. What is your name?

Max Nicholls

Q2. What is your email address?

mnicholls@sportandrecreation.org.uk

Q3. Please Indicate which organisation you belong to?

Sport and Recreation Alliance

Q4. Privacy Notice

Yes

Our Proposals

Proposed amendments to licence condition 11

Q5. Do you agree with the proposed changes to the wording of the licence condition 11?

Yes – this reflects the changes made to associated secondary legislation.

Q6. Do you think that concerns regarding transparency can be addressed with the new social responsibility code 4.3.3 and associated guidance?

No

It is important that society lotteries employ a high degree of transparency. This is increasingly the case given the greater sums of money involved following the increase of the proceed limits. Lottery players, and the general public more widely, should have sufficient information regarding the likelihood of winning, how prizes are allocated and how proceeds from the lottery are used. Consumers should also expect that The Commission acts to ensure that licensees are fulfilling their requirements, especially regarding the return to good causes.

The new social responsibility code 4.3.3 and associated guidance requires lottery licensees to make available information regarding potential prizes, the likelihood of winning and a description of how winners are determined, which is welcomed. However, the guidance only states that licensees 'should' make available information on the return to good causes, rather than this being a legal requirement. It is suggested that that the provisions outlined in paragraphs 3.1 to 3.4 of the guidance should be legal requirements, i.e. preceded by 'must' rather than 'should'.

It is considered that the level of visibility of the distribution of money to good causes by society lotteries should be the same as that for the National Lottery.

Q7. Do you agree with the proposed wording of the new social responsibility code 4.3.3?

No

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It is considered that the level of visibility of the distribution of money to good causes by society lotteries should be the same as that for the National Lottery.

Q8. Do you have any comments on the proposed guidance?

As outlined in our response to Question 6, a key element of the transparency requirements should be providing information on the return to good causes from society lotteries. The proposed guidance requires lottery licensees to make available information regarding potential prizes, the likelihood of winning and a description of how winners are determined, which is welcomed. However, the guidance only states that licensees 'should' make available information on the return to good causes, rather than this being a legal requirement.

It is suggested that that the provisions outlined in paragraphs 3.1 to 3.4 should be legal requirements, i.e. preceded by 'must' rather than 'should'. It is essential that society lotteries have the same level of visibility of distribution to good causes as with the National Lottery.

Lead in times and costs

Q9. How long a lead-in time would you need to implement the information requirements set out in the proposed guidance?

N/A

Q10. Are you able to provide an estimate of the costs that might be incurred by your lottery through implementing the information requirements? Such costs might include printing costs, website

development etc. Please also provide details of one-off costs and any annual or ongoing costs from the proposals.

N/A

**Sport and Recreation Alliance
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