

Proposed amendments to licence condition 8.1

**Licence condition 8.1.3**

**Display of licensed status – societies and local authorities**

**All lottery operating licences issued to non-commercial societies or local authorities**

- 1 Licensees offering the supply of lottery tickets on websites must display on every screen from which customers are able to access lottery tickets provided in reliance of this licence:
  - a a statement that they are licensed and regulated by the Gambling Commission;
  - b their licence number; and
  - c a link (which will be supplied by the Commission) to their current licensed status as recorded on the Commission’s website.
- 2 Such statement and link must be in the format, provided by the means, and contain the information from time to time specified by the Commission.

Q5- Do you agree with the proposed changes to the wording of licence condition 8.1? **No**

**Comments:** The Lotteries Council has no views on the amendments to conditions 8.1.1 and 8.1.2. Although the Council has no difficulty with the principle of the proposed change to licence condition 8.1.3, there are some matters of detail which it would be helpful to clarify.

The proposed 8.1.3 wording applies to “...every screen from which customers are able to access lottery tickets.” We assume the intention is to require it to apply to every screen on the website from which customers can buy lottery tickets. It would be helpful if either this was confirmed in the accompanying guidance or, preferably, the wording of the condition itself were amended to “every screen from which customers are able to buy lottery tickets”. If the wording is intended to mean something different than this, it would be helpful for that to be clarified.

The proposed wording applies to “All lottery operating licences issued to non-commercial societies or local authorities”. If it is also intended to apply to External Lottery Managers (ELMs), it would be helpful to state this.

Assuming the condition is intended to apply to ELMs, it would be helpful for either the wording of the condition itself, or the accompanying guidance, to clarify the Commission's expectation of how this should work for an ELM. Is the requirement that, on every website screen from which a customer could buy a ticket through the ELM, the ELM must say it is regulated by the Commission, provide its licence number, and provide the link to the ELM's status as shown on the Commission's website? Or must the ELM, in addition to providing such information regarding the ELM, also on the same screen provide all such information for all of the promoting societies for which it operates as an ELM and in respect of which the customer could purchase a ticket? That would seem potentially unwieldy from

the perspective of the consumer, particularly if they were viewing this information through a mobile device. Or would the Commission expect the details of the ELM to appear on the website page from which tickets can be bought, but that this page should also contain a clear link through to a different page where such information relevant to each of the promoting societies can be found?

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