



department for
**culture, media
and sport**

Consultation on the proposed merger of the Gambling Commission and the National Lottery Commission

31 July 2012

Our aim is to improve the quality of life for all through cultural and sporting activities, support the pursuit of excellence, and champion the tourism, creative and leisure industries.

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Chapter 1: Introduction

1.1 The Government has committed to increasing the accountability and reducing the number and cost of public bodies. Ministers believe that merging the Gambling Commission (GC) and National Lottery Commission (NLC) will help achieve this aim while preserving the appropriate and effective regulation of gambling and the National Lottery and delivering other organisational benefits. A provision to merge the two bodies was therefore included in the Public Bodies Bill which received Royal Assent in December 2011¹.

1.2 The National Lottery currently produces a public benefit of around £1.6 billion a year for good causes. The regulated Gambling industry is worth £9.9 billion to the UK economy (25% of this comprises of National Lottery GGY), generates over £1.4 billion a year in duty (including the National Lottery) and employs around 115,000 people. The creation of a single regulator should ensure that regulation continues to protect the public, particularly in light of rapid change and innovation in the overall gambling market, while allowing regulated sectors to flourish in order to deliver the public benefits outlined above.

1.3 The Government believes the merged body will be well placed to advise on gambling and National Lottery matters; make evidenced based regulation easier to achieve and create synergies in understanding game and technological developments. Over time, the co-location of the two existing bodies (which has already occurred) and merger will generate cost savings which should help reduce pressures on existing sources of funding, including fees, although this will be offset initially by transitional costs. Further details of estimated costs and savings of the proposed merger are set out in the Impact Assessment accompanying this consultation.

1.4 The legal power by which the Government proposes to merge the two Commissions comes from the Public Bodies Act 2011. That power is broad enough to allow additional provisions to be made that deal with practical or consequential matters necessary to give proper effect to the merger. It is not broad enough to allow any modifications to existing statutory duties and functions which do not follow from the merger to be made to either Commission or the way in which either Commission operates. It is the Government's intention for the merged body to retain the existing duties and functions of the Gambling and National Lottery Commissions

1.5 The objective of the merger might therefore be described as: To continue to protect the public (by ensuring that all gambling including the National Lottery continue to be conducted fairly and openly, are crime free and do not put children or other vulnerable people at risk) and subject to that, to permit gambling and to maximise the NL's return to good causes while securing the benefits from removing duplication and from concentrating the expertise on gambling regulation.

¹ <http://www.legislation.gov.uk/ukpga/2011/24/contents/enacted/data.htm>

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1.6. The Gambling Commission has a remit covering Great Britain and the National Lottery Commission covers the United Kingdom. The Government does not envisage any problems in the merged organisation covering different jurisdictions in respect of different functions. If a single merged regulator is created, we therefore do not propose to amend the scope of territorial responsibility for these functions which, in any case, as this would go beyond the scope of the 2011 Act.

1.7 The power to merge bodies under the 2011 Act allows Ministers to merge bodies in a group in schedule 2 of the Act:

(a) to abolish all the bodies or offices in the group, create a new body corporate or office and transfer some or all of the functions of the abolished bodies or offices to the new one, or

(b) to abolish all but one of the bodies or offices in the group and to transfer some or all of the functions of the abolished bodies or offices to the remaining one.

1.8. The Government preferred option is to use the powers in the 2011 Act to implement the proposals outlined in this consultation and to merge the two bodies by abolishing the NLC and transferring its powers to the GC.

1.9. The 2011 Act, as approved by Parliament, requires that Ministers consult on their proposals before laying a draft order. On that basis, the Minister invites comments on these proposals as measures that might be carried forward by an order under the 2011 Act, subject to the outcome of this consultation. All responses, including those which propose an alternative to the Government's preferred option, will be given due consideration.

Q1. Do you agree in principle to the proposal to merge the Gambling Commission and the National Lottery Commission? If not, please explain why.

Chapter 2: Background on the GC and NLC

2.1 The National Lottery Commission is a Non-Departmental Public Body (NDPB) responsible for licensing and regulating the National Lottery. In January 2012 it moved from its previous central London office when its lease ended there to co-locate with the Gambling Commission in Birmingham. At the same time, it also introduced shared services, provided by the Gambling Commission, for all its administrative functions. It has six non-executive Commissioners and currently employs 15 staff (reduced from 34 – including all administrative functions - in 2010/11). Its annual expenditure in 2011/12 was £4.5m (including costs of relocation). The NLC is funded through the Consolidated Fund, which is reimbursed by the National Lottery Distribution Fund (NLDF), net of any fees paid into the Consolidated Fund by the National Lottery operator.

2.2 National Lottery games consist of draw-based games, such as Lotto, and Scratchcards. Both forms can be played at retailers and online (where scratchcards take the form of Interactive Instant Win Games). There are presently approximately 27,500 National Lottery retailers throughout the UK but this is due to increase to 35,500 retailers by 2013. In addition, people can also play over the Internet; via FastPay outlets at supermarket checkouts; and over mobile phones. Since the first draw in November 1994, the National Lottery has raised over £27 billion for good causes.

2.3 The Lottery is operated by Camelot UK Lotteries Ltd, under a licence granted in 2009 following a full, international competition. The present licence was initially granted for a 10 year period, ending in January 2019. This has recently been extended to January 2023.

2.4 The NLC operates at arm's length from government and its decisions are independent. It has a Board of at least five Commissioners appointed by the Secretary of State for Culture, Media and Sport, who also appoints the Chair. At present, it has seven Commissioners, including the Chief Executive. It meets monthly to make decisions about new Lottery licences and other developments. It also appoints the Chief Executive.

2.5 Its overriding statutory duties are to exercise its functions in a manner it considers will:

- a. ensure that the National Lottery, and every lottery that forms a part of it, is run with all due propriety;
- b. ensure that the interests of every participant in the lottery are protected; and
- c. Subject to these two duties, maximise the amount of money available to good causes.

2.6 The NLC has the following functions:

- d. Running the competition process to select the operator of the Lottery, and granting the operator's licence (which may include such conditions as the NLC considers appropriate).
- e. Licensing each game that the operator wishes to promote, under such conditions as the NLC considers appropriate.

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- f. Reviewing the terms of the Licences it issues and granting consents under those licences in response to changing circumstances or proposals from the Licensee (for example, in cases of change of ownership; organisational structure; introduction of new technologies or to facilitate significant investment).
- g. Checking that the operator meets the conditions of its licences and taking enforcement action where conditions are not met. The range of available actions include financial penalties, seeking an order from the High Court, and in extreme cases, revocation of licences.
- h. Checking that the operator, those who financially benefit from the National Lottery and those who manage its business are fit and proper.

2.7 The NLC is responsible for licensing games, vetting the operator and its suppliers, protecting players and protecting the National Lottery brand. It has access to the operator's systems and records and performs checks on a broad range of the operator's activities. It closely monitors National Lottery sales, and commissions independent research to support the development of the National Lottery and ensure its integrity. The NLC also ensures that it remains capable of running effective competitions for future licences and providing continuity of the National Lottery between Licensees – for example, the NLC is the registered owner of all National Lottery intellectual property.

2.8 The Secretary of State has the same duties as the NLC which he must meet in exercising his functions of making regulations and issuing Directions to the Commission under Section 11 of the 1993 National Lottery etc. Act (as amended). The Commission must comply with those Directions in the exercise of its National Lottery licensing functions. There are presently 13 Directions which relate to: Types of Lottery; Limits on ticket price; Unclaimed prizes; Mandatory conditions in Licences; Financial penalties; Performance standards; Raising public awareness; and Olympic Lottery proceeds.

2.9 **The Gambling Commission** was set up under the Gambling Act 2005 to regulate commercial gambling in Great Britain and became fully operational on 1 September 2007. It is an independent non-departmental public body sponsored by DCMS. It has 204 employees, mostly based in Birmingham, but including over 50 compliance and enforcement managers working across Great Britain. It currently has a Board of eight Commissioners appointed by the Secretary of State, including the Chief Executive. The current Chair of the Gambling Commission, Philip Graf, was appointed on the basis that, should the merger take place, he would Chair the merged body.

2.10 The GC has a budget of £12m (2010/11) which is entirely funded through licence fees paid by gambling operators.

2.11 The GC regulates²:

- i. Over 800 arcade operators with over 2,000 premises
- j. over 500 off-course bookmakers with over 9,000 premises and nearly 700 on-course bookmakers
- k. over 200 bingo operators with nearly 700 bingo clubs
- l. over 50 casino operators with nearly 150 casinos
- m. over 600 gaming machine and gambling software providers
- n. nearly 450 lottery operators (but not the National Lottery) and 29 external lottery managers
- o. 225 British-based remote gambling operators.

The GC does not regulate spread betting (which is a Financial Services Authority responsibility).

² Figures taken from: Industry Statistics 2010/11, Gambling Commission October 2011

2.12 The GC has a statutory duty to permit gambling in so far as the Commission thinks it is reasonably consistent with the licensing objectives:

- (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
- (b) ensuring that gambling is conducted in a fair and open way, and
- (c) protecting children and other vulnerable persons from being harmed or exploited by gambling.

and to provide advice to government (both levels) on gambling and its regulation.

2.13 The GC issues: operating licences to organisations and individuals who are providing facilities for gambling; and personal licences to certain individuals working within the industry. The GC also imposes licence conditions and publishes codes of practice (LCCP) after consultation which sets out the manner in which facilities for gambling should be provided. The Secretary of State can impose licence conditions and make regulations prescribing the parameters within which the Commission operates.

2.14 The GC works closely with licence holders to ensure they comply with the LCCP and have procedures in place to comply with the law. The Commission has legal powers to deal with licensed operators who do not comply with the LCCP including unlimited fines, suspensions or revocations of licences. The GC also has the powers to investigate and prosecute illegal gambling under the Gambling Act 2005 and initiate criminal proceedings in relation to cheating.

2.15 The GC works closely with licensing authorities (local authorities), who are responsible for issuing operators with premises licences and permits and local gambling premises, as well as Her Majesty's Revenue and Customs (HMRC) and local law enforcement. The GC is the primary advisory body to local and national government on gambling including: the incidence of gambling; the manner in which gambling is carried out; effects of gambling; and regulation of gambling.

Chapter 3: Purpose Tests

3.1 A Minister may only make reforms under the Public Bodies Act if they consider that this serves the purpose of improving the exercise of public functions, having regard to—

- Efficiency - the more efficient undertaking of public functions
- Effectiveness - the effective provision of public functions
- Economy, - reform in order to deliver better value for money
- Securing appropriate accountability - to Ministers who are the elected and legitimate office holders who answer to Parliament.

Benefits of merger

3.2 As outlined in the introduction, the gambling sector and the National Lottery are of significant economic importance. The Government believes that a merged body would not only continue the programmes in place for better regulation in both regulatory spheres, but would be well placed to look to make further synergies across merged functions.

3.3 There are regulatory issues which are common to gambling and the National Lottery, such as under age play and speed of play. With increased use of internet based instant play lottery games, the distinction between some aspects of lotteries and other types of gambling is becoming less clear cut. A single entity would be better placed to delineate the boundary between the two and to look at demarcation issues 'in the round' when advising Ministers.

3.4 There will also be benefits in the improved opportunities to develop wider and deeper skills across the staff of the organisations; allow better career development; make the organisations more sustainable; and allow better cross-fertilization of ideas and best practices.

3.5 A merged body should also deliver efficiency savings in the costs of running the organisations and deliver value for money for fee payer and Lottery good causes. Savings have already been achieved through the co-location of the NLC with the GC in Birmingham and the increasing sharing of back office functions and common services. We believe these measures are saving in the region of £1m a year, although in the short term this is being partially offset by NLC relocation costs (including those of backfilling posts and the establishment of common services) and redundancies.

3.6 Merger of the two organisations would bring further limited financial benefits beyond co-location.

They would include:

- a. A reduction in the number of board members, generating savings in remuneration and T&S and recruitment costs (partially offset by any increased travel to Birmingham)
- b. A reduction in senior management numbers (but less than proportionate cut in costs as the second tier responsibilities would be greater)
- c. Some small further savings in administrative and management functions

- d. Longer term savings through inspection, compliance and enforcement functions synergies though constrained by the need to retain commercial confidentiality [Small savings on DCMS sponsorship costs]

The savings generated by merger will be offset to some degree in the early years by:

- e. the diversion of senior resource from normal regulatory business into extracting the economies and melding the organisations into one
- f. costs arising from transitional arrangements, including staff resource to manage the process, a degree of double banking initially to ensure continued delivery of e.g. lottery revenue and GC savings/quality improvements while transfer of knowledge and experience takes place and any redundancy costs arising from the merger of activities.
- g. Initial communication costs

3.7 The Government will aim for the total number of Commissioners on the merged body to be less than the combined number of Commissioners (15) current serving on the two bodies.

3.8 The impact assessment for the merger proposals estimates the annual net savings of the Government's preferred merger option to be £166,000 mainly from savings in Board and senior executive. In the spending review period, this will be offset by the transitional and preparatory costs.

Risk of potential conflicts of interest

3.9 In considering merging the two organisations, the Government has considered whether there are potential conflict of interest risks and how they might be addressed. An important starting point is to understand the difference between the two existing regulatory regimes.

3.10 In basic terms, the GC is responsible for oversight of a private, competitive market, in order to ensure that social responsibility policy objectives are met. The NLC is responsible for a public undertaking, run for public benefit in a non-competitive (monopoly) market. The undertaking is outsourced to a private entity through competition for a single licence. The objectives and duties of the current regulators flow from these different starting points.

3.11 The NLC is not just a regulator of the National Lottery but is, in effect, the 'client' for whom Camelot runs the lottery. This is embodied in the NLC objective to (subject to its public protection duties) maximise the amount of money available to good causes. The GC has a similar regulatory role to the NLC's in relation to the public protection objectives, but does not have a 'client' role, nor does it have an objective to maximise the receipts from the licensable activities. However, subject to consistency with the public protection objectives, it has a duty to allow gambling and hence to permit different operators to maximise their revenues subject to reasonable consistency with the licensing objectives.

3.12 It is important to recognise that the NLC's third objective is a key mechanism for protecting the public interest in the Lottery. It allows the regulator to negotiate with the licensee, where the licensee brings forward proposals for changes to the licence or new activities which might not be dealt with in the incentive structure built into the licence. Examples include the sale of Camelot's shares, and licence extension and investment proposals. In addition, the regulator will wish to ensure there will be strong competition for future licences; and prevent the licensee taking steps that might increase returns in the current licence period, but have adverse consequences for returns under future licences.

3.13 The NLC's client role may raise a concern that the requirement to maximise good causes would (or would be perceived to) give the Lottery operator preferential treatment over other gambling operators. This might lead to suggestions that certain regulatory decisions were unfairly favourable to Camelot in an

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increasingly competitive and crowded market. There may also be a contrary concern that a single regulator is less able to prevent the encroachment of commercial gambling into the National Lottery territory, or that new and innovative National Lottery products could be unnecessarily constrained by an overly cautious approach in order to avoid accusations of bias. A challenge for a merged body will be to demonstrate that it is acting fairly and is even handed. There is potential scope for legal challenge to its decisions: a risk that exists for current regulators.

3.14 In this context it is important to note that the NLC's duty to maximise returns to National Lottery Good Causes only relates to the exercising of functions in relation to National Lottery licensing issues, and is then subordinate to its duties of propriety and player protection. This would remain the case in a merged body, meaning that decisions affecting other forms of gambling would not be subject to the duty to maximise returns to National Lottery Good Causes.

3.15 The GC has to treat and be seen to treat competing sectors fairly and it already regulates several different gambling sectors, including society lotteries which could potentially compete with the National Lottery. The merged body, like the current Gambling Commission, will operate within the legal framework provided which sets out the 'terms of trade' on which the different sectors operate and compete. As at present, it will be for the government, not the new body, to ensure that those terms of trade balance the interests of different sectors. A merged regulator should, however, be well placed to provide the government with comprehensive advice on the implications of regulatory changes across the gambling industry.

3.16 It is possible that bringing the National Lottery and gambling regulation together in the same body will help ensure a common regulatory response to similar issues and risk factors (although the special status of the National Lottery can justify certain regulatory standards being set at a higher level). So it is not necessarily the case that a merger will increase the tensions between the lottery operator and the wider gambling sector.

Steps to address/mitigate those risks

3.17 The main Board will need, in the exercise of its functions, to take a clear view of the potential for any conflict of interest (whether real or apparent) in individual cases as they arise, although this is true for any public body.

3.18 As the Government made clear during the passage of the Public Bodies Bill, it will be important to be able to demonstrate the continuing impartiality of the regulatory body and the governance arrangements of the merged organisation should ensure adequate separation of duties and a firewall to be put in place where genuine conflicts might exist.

3.19 The Government believes that there are options that might provide the necessary assurance that these issues can be effectively and transparently managed. These might include delegating Commissioners to take decisions and make recommendations in relation to the National Lottery; establishing a dedicated team to lead on National Lottery issues in order to ensure familiarity and expertise in relation to the Licence and how it operates (thereby allowing those individuals to be isolated from any issues of commercial confidentiality) and ensuring that the way the new organisations works and its decisions are open to scrutiny to reassure stakeholders that there is no conflict.

3.20 The Government has considered whether these requirements should be set out in statute through the 2011 Act order, but has decided that this is neither necessary nor desirable. Experience of other regulators suggests that such structures need flexibility in order to respond to changing regulatory good practice and respond to issues that arise post-merger in a relatively quick and responsive manner. There are also

mechanisms in place to ensure appropriate oversight, including the Management Agreement that the Department has with each of its arms-length bodies.

3.21 While Ministers believe that regulators should be independent of Ministerial intervention on operational matters, the Secretary of State would retain the existing powers of direction over the NLC regarding National Lottery licensing issues (see para 2.8 above). In relation to gambling, the Secretary of State can impose licence conditions and make regulations prescribing the parameters within which the GC operates. Those powers would continue after merger.

Fees and resources

3.22 It will be important is to show that, post-merger, there is no cross subsidy and that mainstream gambling cannot argue that it is funding National Lottery regulation, and vice versa. The usual accounting requirements will show the organisation's income from the various sources and the expenditure on discrete areas of activity. There will also be an allocation of costs across shared services such as legal, back office, HR, finance, press and (some) research. However, this already happens as a result of co-location of the GC and NLC and is therefore not an issue which arises because of the merger, but will be potentially brought into sharper focus because of the merger.

3.23 Fee will be kept under annual review in the usual way and, the Government does not propose to amend the existing funding mechanisms for either the GC or the NLC on merger. The Government believes that the full cost of gambling regulation should be met by the regulated industry rather than the taxpayer, and the National Lottery regulation will continue to be funded by principally by the NLDF with some licence fee income. It will, however, be important to ensure that the new organisation can manage its resources in such a way that minimises the risks of unexpected costs or increases in income in one area causing pressures in another.

3.24 If the merger is achieved through abolishing both bodies and creating an entirely new entity, there would be some additional costs and staff disruption. This would include the need to consult all staff formally about transfer to a new body (instead of just those currently employed by the NLC); amending GC contracts with suppliers and other documentation as necessary to be in the name of the new body.

3.25 This suggests that the Government's preferred option to merge the bodies through transferring the NLC functions to the GC would be simpler and more cost effective than abolishing both bodies and creating a new one. The merged body would legally be called the Gambling Commission but the part of the organisation which dealt with the transferred distinctive National Lottery Commission functions could, with the Secretary of State's consent continue to use the current NLC branding and logo, making it clear that it was now part of the merged Gambling Commission. This would save any rebranding costs and at the same time underline the distinctive role of regulating the national lottery and securing maximum return to good causes.

Questions

Q2. Do you have any concerns about a single regulator? If so, please specify

Q3. Do you agree that the measures for handling the different regulatory requirements of the National Lottery should not be prescribed in statute, but left for

the Board to decide, within the usual ALB oversight arrangements? What considerations do you think the Board should bear in mind?

Q4. Do you agree with the Government's preferred option of abolishing the NLC; transferring its functions to the GC?

Chapter 4: Protection

4.1 Ministers may only make an order under the Public Bodies Act if they consider that the order does not remove any necessary protection, and the order does not prevent any person from continuing to exercise any right or freedom which that person might reasonably expect to continue to exercise.

4.2 The Government recognises that, in merging the two organisations, care should be taken not to damage the effectiveness of the current regulatory structure, nor upset the balance between public protection and the benefits from gambling and lottery activity. While there have been some indications of increases in problem gambling, this remains at low levels in Britain.

4.3 The existing NLC duty to maximise returns in the exercise of its licensing functions is subordinate to the other current NLC duties of propriety and player protection, and this will remain the case in the merged body. This provides the safeguard that player protection issues are properly addressed before any consideration is given to maximising returns to Good Causes. Similarly, provided it is consistent with the licensing objectives, the Gambling Commission's duty is to permit gambling i.e. by operator's intent on maximising their returns. So operators currently regulated by the GC are subject to broadly similar social responsibility constraints as the National lottery.

4.4 As mentioned earlier, it is intended that the merger will maintain or improve existing protections, as required by the Public Bodies Act. The power to merge conferred by that Act does not permit more extensive modification to either Commission or the current regulatory framework in which they operate, except as is necessary to give practical and sensible effect to the merger. The merger through generating some synergy between those regulating the National Lottery and those regulating the rest of commercial gambling and strengthening the quality of the advice to government on gambling may bring benefits of more effective and efficient legislation which has the potential to enhance the public protection in these areas.

Question

Q5. Do you agree that the proposed merger will not remove any necessary protection? If you have any concerns please specify.

Q6. Do you agree that the proposed merger will not prevent any person from continuing to exercise any right of freedom which they might reasonably expect to continue to exercise? If you do not agree please give details of the rights at risk.

Appendix A: List of Questions

Q1. Do you agree in principle to the proposal to merge the Gambling Commission and the National Lottery Commission? If not, please explain why.

Q2. Do you have any concerns about a single regulator? If so, please specify

Q3. Do you agree that the measures for handling the different regulatory requirements of the National Lottery should not be prescribed in statute, but left for the Board to decide, within the usual ALB oversight arrangements? What considerations do you think the Board should bear in mind?

Q4. Do you agree with the Government's preferred option of abolishing the NLC; transferring its functions to the GC?

Q5. Do you agree that the proposed merger will not remove any necessary protection? If you have any concerns please specify.

Q6. Do you agree that the proposed merger will not prevent any person from continuing to exercise any right of freedom which they might reasonably expect to continue to exercise? If you do not agree please give details of the rights at risk.

Appendix B: How to respond

You can respond to the consultation in the following ways:

Online

Responses should be sent to gambling.consultations@culture.gsi.gov.uk

By post

You can print out the summary list of questions above and fill in responses by hand. Please send these to:

Stuart Roberts
Gambling Sector
Department for Culture, Media and Sport
2-4 Cockspur Street
London SW1Y 5DH

Closing date

The closing date for responses is 23 October 2012

After the consultation

We will post a summary of answers at on the DCMS website (www.culture.gov.uk) after the end of the consultation together with an analysis of responses. We will publish the Government's response in due course.

Freedom of Information

We are required to release information to comply with the Environmental Information Regulations 2004 and Freedom of Information Act 2000. We will not allow any unwarranted breach of confidentiality, nor will we contravene our obligations under the Data Protection Act 1998, but please note that we will not treat any confidentiality disclaimer generated by your IT system in e-mail responses as a request not to release information.

Compliance with the Code of Practice on Consultation

This consultation complies with the Code.

Complaints

If you have any comments or complaints about the consultation process (as opposed to comments on these issues that are part of the consultation) please contact the DCMS Correspondence Team at the above address or e-mail using the form at www.culture.gov.uk/contact_us, heading your communication "Gambling Commission/National Lottery Commission Merger".

Appendix C: Consultation List

Ministers proposing to make an order under The Public Bodies Act are required to consult the body or the holder of the office to which the proposal relates, such other persons as appear to the Minister to be representative of interests substantially affected by the proposal and, where relevant, Ministers in the Scottish and Welsh devolved administrations and the Northern Ireland Department.

This consultation has therefore been sent directly to the following. However, as a public consultation, it is open to anyone who wishes to comment to respond to the consultation and all views will be given full consideration.

National Lottery Commission
Gambling Commission
Camelot
British Amusements Catering Trades Associations
National Casino Industry Forum
Casino Operators Association
Association of British Bookmakers
Bingo Association
Business in Sport and Leisure
British Beer and Pub Association
Local Government Association
Responsible Gambling Trust
Responsible Gambling Strategy Board
National Lottery Distributors
Lotteries Council
Consumer Focus
Association of Convenience Stores
British Retail Consortium
Association of Chief Executives of Voluntary Organisations
National Council for Voluntary Organisations
Gamcare