

Title: Consultation on the minimum age for playing National Lottery games IA No: RPC Reference No: RPC-4397(1)-DCMS Lead department or agency: Department for Digital, Culture, Media and Sport (DCMS) Other departments or agencies: N/A	
	Date: 13/05/2019
	Stage: Consultation
	Source of intervention: Domestic
	Type of measure: Regulatory
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Summary: Intervention and Options
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What is the problem under consideration? Why is government intervention necessary?

The current licence to run the National Lottery is due to expire in 2023. The Gambling Commission has begun work to design and run a competition to award the next National Lottery Licence. The start of a new licence period is an opportune time to ensure that the policy framework for the National Lottery is fit for the future.

The minimum age to play the National Lottery was set at 16 in 1994. National Lottery games are split into two categories: draw-based games such as Lotto and EuroMillions; and instant win games which consists of scratchcards and online instant win games. Draw-based and instant win games have the same minimum age of 16 to play.

Since the award of the third National Lottery licence in 2009, there have been changes to the landscape in which the National Lottery sits. There has been a significant growth in online gambling in general and major new online and mobile platforms have revolutionised the way players interact with the National Lottery games (total GGY in 2008/09 for remote gambling was £1.53bn¹ which has since increased to £5.6bn in 2018/19²). In addition to technological changes, the relative proportion and total sales revenue of instant win games, especially scratchcards, has increased. This raises the question whether the availability of all National Lottery games to those under 18 remains appropriate.

Research data from the latest combined Health Survey³ showed that problem gambling rates for players of National Lottery draw-based games were 1.0%, while the figure for scratchcards was 1.8%. Instant win games, such as scratchcards, also have some of the characteristics of commercial gambling products such as speed of play and instant gratification which are associated with higher risk of harm.

Gambling-related harm produces several negative externalities including but not limited to: increased healthcare costs, welfare costs, and other costs to individuals associated with problem gamblers (e.g. family, friends and employers).

¹p.10. <https://www.gamblingcommission.gov.uk/PDF/Online-review-March-2018.pdf>

² <https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-industry-statistics.pdf>

³ Published in September 2018

<https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-behaviour-in-Great-Britain-2016.pdf>

What are the policy objectives and the intended effects?

The government’s objectives for this consultation are:

- to ensure that young people are protected from the potential risks of gambling related harm;
- to maintain the National Lottery’s special status as a low-risk product and distinct from commercial gambling, to ensure that it remains attractive to the player base and continues to support good causes in the future;
- to respond to trends in technology and player behaviour and future proof the National Lottery for the life of the next licence;
- to ensure that there is a clear position regarding the minimum age to play National Lottery games for the upcoming bidding process for the fourth National Lottery licence competition.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Option 1 - Business as usual (Counterfactual) - Retain the minimum age of 16 for all National Lottery games

Option 2 - Raise the minimum age to 18 for National Lottery instant win games

Option 3 - Raise the minimum age to 18 for all National Lottery games

We wish to adopt a proportionate, precautionary approach with a view to protect 16 and 17 year olds from possible or future harm. The initial position, based on the evidence examined in the consultation, is to raise the minimum age to 18 for instant win games (scratchcards and online instant win games) and maintain the 16 limit for draw-based games (Option 2 above), but we welcome views on this approach and are seeking further evidence in the consultation.

Will the policy be reviewed? No If applicable, set review date: N/A

Does implementation go beyond minimum EU requirements?		No		
Is this measure likely to impact on trade and investment?		No		
Are any of these organisations in scope?	Micro	Small	Medium	Large
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)		Traded: N/A		Non-traded: N/A

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible :

Catherine Colebrook Date:

3 June 2019

Summary: Analysis & Evidence

Policy Option 2

Description: Raise the minimum age to 18 for National Lottery instant win games ('More Likely' Option)

FULL ECONOMIC ASSESSMENT

Price Base Year 2019	PV Base Year 2023	Time Period 10 Years	Net Benefit (Present Value (PV)) (£m)		
			Low: n/a	High: n/a	Best Estimate: -46.5

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	-	-	-
High	-	-	-
Best Estimate	Not monetised	5.4	46.5

Description and scale of key monetised costs by 'main affected groups'

The key costs associated with this policy would result from the reduction of National Lottery instant win game sales due to the potential end of sales of this game type to 16 and 17 year olds. This would affect the National Lottery distributors whose income is linked to National Lottery sales and the National Lottery Operator with regard to a possible reduction in profits. There would also be a cost to retailers who receive a commission for retail sales of scratchcards. Any reduction in sales, due to an increase to the minimum age, would result in a reduction of the associated commission. There would be some transitional costs to both the National Lottery Operator and retailers during implementation of an increase to the minimum age. There may also be some additional regulatory costs associated with different minimum age limits for draw-based games and instant win games.

Other key non-monetised costs by 'main affected groups'

We have been unable to monetise the transition cost at this stage, but will seek information in the consultation to better understand the cost for final proposal.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	-	-	-
High	-	-	-
Best Estimate	Not Monetised	Not Monetised	Not Monetised

Description and scale of key monetised benefits by 'main affected groups'

There are no monetised benefits to main affected groups.

Other key non-monetised benefits by 'main affected groups'

The most significant non-monetised benefits are the benefits to society from the decrease in the risk of problem gambling in 16 and 17 year olds. Adolescence is a key stage of development and any harms experienced at this stage in life can be detrimental to the future development, confidence and potential of young people.

The policy aims to ensure the framework for the National Lottery continues to protect young people from the potential risk of gambling related harm. A study by IPPR, commissioned by the charity Gamble Aware, estimated that the cost of problem gambling to the UK government was between £0.26 and £1.2 billion per annum⁴. It is not possible to accurately estimate the cost of problem gambling which is attributable to the 16/17 age group, nor is it possible to estimate the costs caused by individual games, products or gambling sectors. This is supported by research which shows that rates of problem gambling are higher among those who participate in more than one activity.

The policy also aims to maintain the National Lottery's special status as distinct from other forms of gambling and therefore ensure that the National Lottery continues to support good causes in the future. It is not possible to monetise this benefit. Sales of the National Lottery totalled c. £7 billion in 2017/18 which provided c. £1.6 billion to

⁴ <https://about.gambleaware.org/media/1366/2016-057-2016-12-13.pdf>

good cause sectors. The vision and success of the UK National Lottery has always been to encourage lots of people to play the National Lottery games but to individually spend relatively small amounts. This strategy in conjunction with the player protection policies of the operator, and scrutiny from the Gambling Commission, mean that both the government and players can be confident that National Lottery games have a very low risk of causing harm to players.

Key assumptions/sensitivities/risks	Discount rate (%)	3.5
<ul style="list-style-type: none"> - Assumes fixed sales over the appraisal period. - There is the key risk associated with the fact that it is difficult to quantify gambling harm and inherently problematic to conduct cost-benefit analysis on policies to reduce it. 		

BUSINESS ASSESSMENT (Option 2)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m: 20.7
Costs: 5.4	Benefits: 0.0	Net: 5.4	

Summary: Analysis & Evidence

Policy Option 3

Description: Raise the minimum age to 18 for all National Lottery games

FULL ECONOMIC ASSESSMENT

Price Base Year	PV Base Year	Time Period	Net Benefit (Present Value (PV)) (£m)		
			Low: -	High: -	Best Estimate: -94.5
2019	2023	10 Years			

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	-	-	-
High	-	-	-
Best Estimate	Not monetised	11.0	94.5

Description and scale of key monetised costs by 'main affected groups'

The key costs associated with this policy would result from the reduction of total National Lottery sales due to the potential end of sales to 16 and 17 year olds. This would affect the National Lottery distributors whose income is linked to National Lottery sales and the National Lottery Operator with regard to a possible reduction in profits. There would also be a cost to retailers who receive a commission for retail sales of National Lottery games. Any reduction in sales, due to an increase to the minimum age, would result in a reduction of the associated commission. There would be some transitional costs to both the National Lottery Operator and retailers during implementation of an increase to the minimum age.

Other key non-monetised costs by 'main affected groups'

We have been unable to monetise the transition cost at this stage, but will seek information in the consultation to better understand the cost for the final proposal.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	-	-	-
High	-	-	-
Best Estimate	Not monetised	Not monetised	Not monetised

Description and scale of key monetised benefits by 'main affected groups'

There are no monetised benefits to main affected groups.

Other key non-monetised benefits by 'main affected groups'

The most significant non-monetised benefits are the benefits to society from the decrease in the risk of problem gambling in 16 and 17 year olds. Adolescence is a key stage of development and any harms experienced at this stage in life can be detrimental to the future development, confidence and potential of young people.

The policy aims to ensure the framework for the National Lottery continues to protect young people from the potential risk of gambling related harm. A study by IPPR, commissioned by the charity Gamble Aware, estimated that the cost of problem gambling to the UK government was between £0.26 and £1.2 billion per annum⁵. It is not possible to accurately estimate the cost of problem gambling which is attributable to the 16/17 age group, nor is it possible to estimate the costs caused by individual games, products or gambling sectors. This is supported by research which shows that rates of problem gambling are higher among those who participate in more than one activity.

The policy also aims to maintain the National Lottery's special status as distinct from other forms of gambling and therefore ensure that the National Lottery continues to support good causes in the future. It is not possible to monetise this benefit. Sales of the National Lottery totalled c. £7 billion in 2017/18 which provided c. £1.6 billion to good cause sectors. The vision and success of the UK National Lottery has always been to encourage lots of

⁵ <https://about.gambleaware.org/media/1366/2016-057-2016-12-13.pdf>

people to play the National Lottery games but to individually spend relatively small amounts. This strategy in conjunction with the player protection policies of the operator, and scrutiny from the Gambling Commission, mean that both the government and players can be confident that National Lottery games have a very low risk of causing harm to players.

There may be some marginal non-monetised benefits to retailers associated with the alignment of minimum age for National Lottery games, alcohol and tobacco (e.g. compliance costs); though there will remain some products with a minimum age of 16 (e.g. aerosol spray paints⁶).

Key assumptions/sensitivities/risks	Discount rate (%)	3.5
<ul style="list-style-type: none"> - Assumes fixed sales over the appraisal period. - There is the key risk associated with the fact that it is difficult to quantify gambling related harm and inherently problematic to conduct cost-benefit analysis on policies to reduce it. 		

BUSINESS ASSESSMENT (Option 3)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m: 42.1
Costs: 11.0	Benefits: 0.0	Net: 11.0	

⁶ Anti-social Behaviour Act 2003

Background

The UK-wide National Lottery was established under the National Lottery etc. Act 1993. The Government of the time set up the National Lottery to support our national heritage, arts, sporting and community life. The vision and success of the UK National Lottery has always been to encourage lots of people to play the National Lottery games but to individually spend relatively small amounts. Since the launch of the National Lottery in November 1994, it has raised over £40 billion for good causes.

Regulation

The Secretary of State and the Gambling Commission are charged, under s4 of the 1993 Act, with the same overriding duties:

- to ensure the Lottery is run with all due propriety;
- to ensure the interests of participants are protected;
- subject to these to ensure that returns to good causes are maximised.

The licence to run the National Lottery requires that robust player protection measures are in place to ensure the safety of all players. This includes the application of a player protection strategy which must be approved by the regulator and an expectation of greater transparency from the operator than of other commercial operators.

Both the Gambling Commission and the operator have a duty to prevent problem play on the National Lottery. Details of the robust regulations that are in place and the player protection strategy of the current operator are outlined in Annex B.

Additionally, the National Lottery is subject to particularly thorough Parliamentary and regulatory oversight. These characteristics and other controls set out in the founding legislation have created what is often described as “clear blue water” between the National Lottery and other gambling products.

Minimum age

The current licence to run the National Lottery is due to expire in 2023. The Gambling Commission has begun work to design and run a competition to award the next National Lottery Licence. The start of a new licence period is an opportune time to ensure that the policy framework for the National Lottery is fit for the future.

Since the award of the third National Lottery licence in 2009, there have been changes to the landscape in which the National Lottery sits. There has been a significant growth in online gambling in general and major new online and mobile platforms have revolutionised the way players interact with the National Lottery games. In addition to technological changes, the relative proportion and total sales revenue of instant win games, especially scratchcards, has increased. This raises the question whether the availability of all National Lottery games to those under 18 remains appropriate. This consultation document presents the evidence and options under consideration to address these changes.

The default minimum age limit for all types of lottery games is 16. The lotteries sector is one of several exceptions to the minimum age of 18 for accessing the majority of commercial gambling products. These exceptions recognise the characteristics of these products and associated low risk of harm.

The minimum age for playing National Lottery games was set at 16 in 1994. This mirrored the existing legislative position for society lottery games which could only be played by those aged 16 or over. The minimum age of 16 reflected the fact that the National Lottery and other lotteries were conceived as different, and separate, from other forms of gambling. This difference was justified as the National Lottery would be distinct from commercial gambling products which are associated with a higher risk:

- It would provide money to good causes;
- It would cost a small amount to play for a small chance of winning life changing jackpots;
- It would not encourage (nor easily allow) repetitive play e.g. chasing losses; and

- It would be regulated differently, with a clear focus on propriety and player protection that was to be “built in” and enforced by statute and the operator

The National Lottery has a special status that is distinctive and distinguished from other types of gambling and its primary purpose is to raise funds to support good causes. The regulations, player protection strategies and focus on consumer protections have helped to ensure that the National Lottery is low risk, responsible and involves mass participation.

Section 12 of the National Lottery etc. Act 1993 allows the Secretary of State to amend the minimum age for playing National Lottery products using secondary legislation by negative resolution. This power to amend the minimum age for playing the National Lottery recognises that this may be an area where there is a case for change, in the event that the circumstances of the National Lottery have changed.

National Lottery games

There are two types of National Lottery games:

- **draw-based games**, such as Lotto and EuroMillions where a ticket is bought at least 15 minutes in advance of a draw. These games are characterised by a low ticket price, limited draw frequency, high odds and life changing top prizes
- **instant win games**, where a prize can be won directly after purchase (scratchcards and online instant win games), on average across all instant win games there is a 1 in 4 chance of winning a prize. Instant win games have a faster speed of play in comparison to draw-based games and a wider range of price points.

Figure 1. Characteristics of National Lottery draw-based games and instant win games⁷

Draw based games	Instant win games
Single events taking place on set days of the week	Can be played at a higher frequency
Time delay of at least 15 minutes between ticket purchase and draw	Instant loss/reward
Small range of game prices (£1 to £2.50)	Bigger range of game prices with higher maximum (£0.25 to £10)
High maximum prize (e.g. c.£11m-£12m for must-be-won Lotto draws, a maximum of c.£167m for EuroMillions)	Range of small to medium prize levels (Maximum of up to £4m)
Higher odds (e.g. for Lotto, 1 in 9.3 of winning any prize and 1 in 93 of winning a cash prize)	Lower odds (on average across all instant win games there is a 1 in 4 chance of winning a prize)
Lower rate of prize return to players (average of 49% of revenue in 2017/18)	Higher rate of prize return to players ⁸ (average of 68% of revenue in 2017/18)
Higher returns to good causes	Lower returns to good causes

⁷ Details for game prices, prize levels and odds accurate as at 10/05/2019. Maximum prize for EuroMillions dependent on exchange rate.

⁸ The prize payout percentage for scratchcards and online instant win games range between 50 - 75%, with prize payout for £10 games restricted to 73.5%.

(average of 30% of revenue in 2017/18)	(average of 10% of revenue in 2017/18)
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When the National Lottery was first launched it consisted only of the traditional draw-based game now known as 'Lotto', scratchcards were launched a few months later in 1995. Since then the National Lottery game portfolio has evolved and a number of additional draw-based games have been included over time and online instant win games were added in 2003.

During this period, the commercial gambling market has changed significantly, with the emergence and growth of online gambling from the 2000s until the present day. The Gambling Commission's review of the online gambling market reported significant growth in the online sector, with double digit annual growth between 2008/09 and 2016/17. The gross gambling yield (GGY) in 2008/09 for remote gambling was estimated at £1.53bn, although the Gambling Commission only became responsible for regulating the whole online sector and collecting data on it from November 2014. GGY for remote gambling was £5.6bn in 2018/19.

The review noted that it was likely that the online sector would continue to grow. The Commission found that, in addition to consumer behaviour and technological factors, growth would be driven by attracting new groups of consumers and by increased product personalisation. However, although there is a clear trend toward online sales, the majority of National Lottery sales (around 75% in 2018/19) still take place in a retailer.

International comparisons

The Gambling Commission have provided evidence on international comparisons for the minimum age for playing lotteries. They considered age restrictions which apply to gambling across 50 jurisdictions. The Gambling Commission found only four jurisdictions, Austria, Estonia, the UK and Switzerland, which permit play at 16 and 17. Within this group both Austria and Switzerland limit play to the retail environment with online sales restricted to 18 or above. All other jurisdictions studied have a minimum age for lottery play of 18 or above which, in general, is aligned with the age restriction imposed on other gambling products.

Gambling restrictions and gambling culture varies across different jurisdictions. It appears that the majority of age restrictions were set when the respective lottery was established and the research did not find evidence of any of the jurisdictions changing the minimum age for lottery play. Therefore, this consultation and options appear to be unique and we cannot draw evidence of previous positive or negative impacts from a change to the minimum age for lotteries from similar changes elsewhere.

Considerations

Looking ahead to the fourth licence, new technologies will continue to create opportunities for more innovative games which could bring National Lottery games increasingly closer to those found in the commercial gambling sector. For example, research by Mintel noted that more exciting versions of instant games provide a market opportunity for the National Lottery to increase online market share. In addition to technological changes, there has been a trend in instant win games occupying an increasing proportion of the sales portfolio. This raises the question whether the availability of all National Lottery games to those under 18 remains appropriate as noted by the Responsible Gambling Strategy Board. The government response to the review of changes to gaming machines and social responsibility measures across the gambling sector, published in May 2018, included a commitment to consider the minimum age for playing National Lottery games.

The government's objectives for this consultation are:

- to ensure that young people are protected from the potential risks of gambling related harm;
- to maintain the National Lottery's special status as a low-risk product and distinct from commercial gambling, to ensure that it remains attractive to the player base and continues to support good causes in the future;
- to respond to trends in technology and player behaviour and future proof the National Lottery for the life of the next licence;
- to ensure that there is a clear position regarding the minimum age to play National Lottery games for the upcoming bidding process for the fourth National Lottery licence competition.

The consultation sets out a summary of the evidence, views and research the government has considered in setting out the options for changes to the minimum age for playing National Lottery games.

There are three options under consideration in this consultation on changes to the minimum age for National Lottery games:

- Option 1 - Do nothing, retain the minimum age of 16 for all National Lottery games
- Option 2 - Raise the minimum age to 18 for National Lottery instant win games (i.e. scratchcards and online instant win games)
- Option 3 - Raise the minimum age to 18 for all National Lottery games

Evidence

Participation

According to survey data collected by the Gambling Commission⁹, 16 and 17 year olds made up 0.8% of draw-based game 'regular players' and 1.6% of scratchcard 'regular players'. Regular players are defined as respondents who reported playing draw-based or scratchcard games at any time in the last month.

Survey data between April 2016 and March 2019, provided by the Gambling Commission, found that of the 16 and 17 year olds surveyed, a similar proportion reported playing draw-based games (13.8%) and scratchcard games (15.6%) in the last month. This is different to the older age groups where respondents were more likely to have played draw-based games than scratchcards.

The survey data also suggests that almost 40% of 16 and 17 year olds have ever played scratchcard games whereas only around 26% have ever played draw-based games. This suggests that 16 and 17 year olds are more likely to try scratchcards than draw-based games.

The number of 16 and 17 year olds playing National Lottery online instant win games is very low and there is no indication, from the data available, of growth in the number of 16 and 17 year old players participating in this sales channel.

The data on participation rates does not suggest that there are significantly greater numbers of 16 and 17 year olds who regularly play scratchcard games or draw-based games. Although there are lower participation rates than for other age groups, there are still a considerable number of National Lottery players who are 16 and 17.

⁹ Data is based on a sample of the population with quota and weighting controls to help ensure that the respective numbers surveyed in each age group are representative of the whole UK population. Gambling Commission survey data obtained between April 2016 and March 2019. 40,147 people were surveyed of which 1112 were aged 16 or 17. This equates to 2.77% of the total people surveyed which is comparable with the proportion of the UK population that are 16 or 17 years old (2.72%).

Figure 2. Estimated number of 16 and 17 year old National Lottery ‘regular players’ based on survey data between April 2016 and March 2019 and population estimates¹⁰

Played NL draw-based games	Played NL scratchcards	Played online instant win games
204,000	231,000	484 ¹¹

Risk of harm

Gambling activities characteristics

A report for the Responsible Gambling Trust in 2016 noted that “patterns of high frequency gambling, as an underlying factor of gambling involvement, are predictive of problem gambling” (Nelson et al, 2008). Therefore gambling activities that provide an opportunity for high frequency gambling are more likely to be associated with problem gambling. The report also stated that activities that have high event frequency and offer numerous, if not unlimited, opportunities to participate will be more attractive to gamblers who are motivated to persist in gambling to recoup their losses.

There are clear differences in the characteristics of National Lottery draw-based and instant win games (as presented in **Figure 1.**). The evidence suggests that instant win games, which provide instant loss/reward and are readily accessible (unrestricted by event frequency), are more likely to be associated with a higher risk of problem play. Draw-based games, which are single, scheduled events with a time delay between purchase and draw, do not have these characteristics and are therefore less likely to be associated with problematic play.

The risks of gambling related harm to young people

This policy aims to ensure that young people playing the National Lottery are protected from the potential risks of gambling related harm. Some research has considered the potential gambling related harms which may also affect young people’s future potential; including emotional wellbeing, family, education, development and behaviour. Adolescence is considered a key stage in young people’s development and research indicates that any harms experienced at this stage are likely to impact their future development, confidence and potential. Research suggests that there is a greater likelihood of developing longer-term problems, such as addictions, where individuals have started engaging in risky behaviours at a younger age.

In order to better evidence some of these assertions, and as part of the National Strategy to Reduce Gambling Harms, a new framework for action to measure gambling related harms among children and young people was launched in April 2019 by the Gambling Commission.

Although better understanding is required on the effects of gambling on young people, it is important that the National Lottery is fit for the future. Evidence shows the risk of harm from National Lottery games is low. However, the option to increase the minimum age for National Lottery games that are considered riskier and have a higher association with problem gambling harms would act with a view to protect 16 and 17 year olds from possible or future harm.

¹⁰ Calculations based on 2017 mid year population estimates and survey data, figures do not reflect actual number of 16 and 17 year old players, results are rounded to the nearest 1,000

<https://beta.ons.gov.uk/filter-outputs/f2e4d989-5ac5-457c-803a-90970ef0539b>

¹¹ 484 is the average number of unique players aged 16 or 17 year based on data received from the Gambling Commission, provided by the National Lottery operator between Q3 2016/17 and Q3 2018/19. Prior to Q3 2016/17 the data was presented for 16-24 year olds. Data available for all quarters in the period with the exception of Q4 2017/18 due to a reporting issue. This number remains relatively stable over this period with a range of 436 to 586. The most recent data for Q3 2018/19 data indicated there were 443 people aged 16 or 17 year playing online instant win games.

Risk of harm from draw-based and scratchcard games

Figure 3. Low risk, moderate risk and problem gamblers prevalence, by activity¹²

Gambling activity	Low risk gamblers (%)	Moderate risk gamblers (%)	Problem Gamblers (%)
Lotteries and related products			
National Lottery draws	4.3	1.8	1.0
Scratchcards	6.7	3.4	1.8
Other lotteries	5.3	2.0	1.5

The data in the table above is for all National Lottery players including those who participate in both the National Lottery and other gambling activities. Current evidence does not suggest a significant risk of harm to 16 and 17 year olds playing National Lottery draw-based or scratchcard games. Research data from the Gambling Commission combined Health Survey (published in September 2018), showed that National Lottery games was associated with the lowest rate of problem gambling across all gambling activities. By comparison, the problem gambling rates for other activities covered by the survey ranged from 2.5% to 13.7%.

The Health Survey also provides some evidence that there may be a correlation between playing National Lottery draw based games and well being. Those surveyed with higher levels of wellbeing were more likely to have participated in National Lottery draws than those who reported low well-being scores. In contrast, the popularity of scratchcards did not vary according to well-being scores.

The data from the Health Survey shows higher problem gambling rates for scratchcard players compared to draw-based game players. The Health Survey does not consider the problem gambling or at risk gambling rates for online instant win games. There are several limitations to the available data for considering the level of harm for 16 and 17 year olds playing the National Lottery. The problem gambling rates 'by activity' do not give a breakdown by age for National Lottery players and are not mutually exclusive from other activities. Therefore, for example, players of National Lottery draws identified as problem gamblers may have taken part in multiple gambling activities.

Other statistics from the Health Survey show that problem gambling is often associated with participating in multiple gambling activities. In cases where there are incidences of problem gambling related to National Lottery games, the National Lottery may be played alongside a range of other gambling products. Additionally, 16 and 17 year olds may be less at risk of harm than other age groups as they are limited to the number of other activities that are legally available to them due to the minimum age of 18 for the majority of other gambling activities.

Risk of harm from online instant win games

Online play is account based which means the National Lottery operator has access to player data which can be used to identify potentially harmful behaviour and to target interventions which aim to reduce the risk of harm.

¹² Data shown is for aged 16 and over with a valid DSM-IV or PGSI score, England, Scotland and Wales [p.73 of the Health Survey].

With regard to online instant win games, the National Lottery operator uses an analytical tool which considers various measures associated with at risk play (such as session length, number and frequency of sessions and total losses) to evaluate player behaviour by risk profile and target interventions to promote positive changes in behaviour.

Data provided by the National Lottery operator for 2018/19 shows that on average there were 13 unique players aged 16 and 17 who played online instant win games and exhibited signs of problem or at-risk play. This is approximately 2.9% of the average number of active 16 and 17 year old players in this period.

The data does not provide evidence of a significant risk of gambling related harm for 16 and 17 year olds from playing online instant win games. Of the very few 16 and 17 year olds that are playing online instant win games there is a small proportion of these players that are exhibiting signs of problem or at-risk play. These statistics cannot be compared with the rates from the health survey data for other National Lottery games or commercial gambling products, as the data provided by the online analytics model is not comparable to markers of low and moderate risk gambling or problem gambling.

Analysis of online play data has led to some benefits for player protection measures and the possibility for the operator to make interventions when necessary. However, aspects of playing in the retail environment not present in online play, such as staff interaction, may help to prevent or deter problem play. In instances of problem play, buying in store from a shop assistant helps to add an element of friction between a compulsion to gamble and the ability to do so. In order to play compulsively it is likely that an individual would have to go to multiple stores and request large amounts of scratchcards/tickets. Furthermore, the National Lottery operator provide a training programme to support retailers in order to prevent excessive play and appropriate resources to offer to any customers they are concerned about.

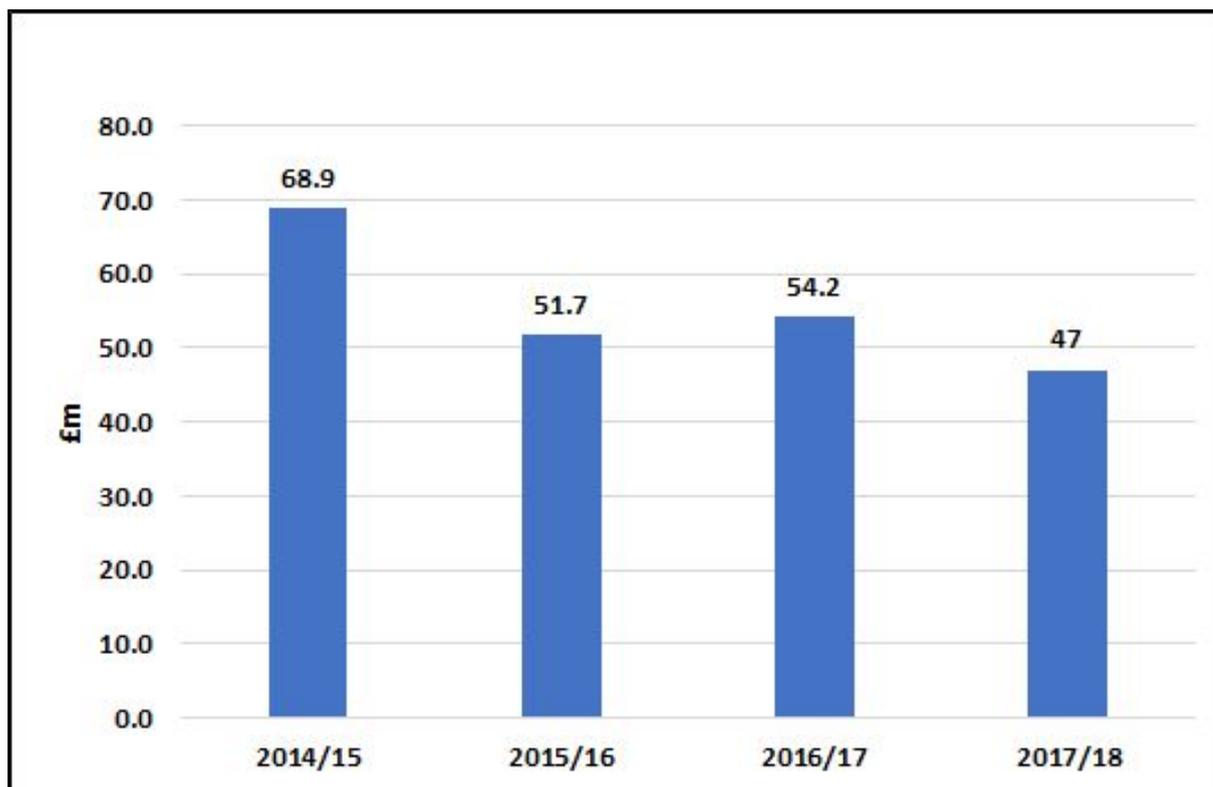
The consultation options propose ensuring the minimum age for online instant win games is consistent with scratchcards due to their similarities and the potential for additional risks from online play. The options presented take into consideration the potential for growth in this sales channel and the potential risks associated with online play, to ensure that the policy framework for the National Lottery is fit for the future.

Sales and good cause returns

The total estimated sales revenues from 16 and 17 year olds in 2017/18 was £47m, of which returns to good causes comprised of around £7m. This was a very small proportion (0.4%) of total returns to good causes from all National Lottery sales.¹³

¹³ Returns to good causes from the National Lottery sales totalled £1,644m in 2017/18, of which estimated returns to good causes attributed to sales to players aged 16 and 17 year were £7m.

Figure 4. Sales revenue for 16 and 17 year old (from all National Lottery games)



The data in **Figure 4.** shows that sales revenue for 16 and 17 year old play has declined over the last 4 years. However, in the absence of further historic data, it is difficult to conclude that this represents a trend.

The majority of sales revenue from 16 and 17 year olds came from scratchcards (68%) followed by draw-based games (32%) and online instant win games (<1%). However, in terms of the relative proportion of good cause returns, draw-based games sales to 16 and 17 year olds contributed around £4m, and scratchcards £3m.

Risk of underage play

Gambling Commission's Young People and Gambling survey includes a section on National Lottery play which excludes data provided by those aged 16 who are legally allowed to play the lottery. Overall, 3% of 11-15 year olds had played any National Lottery game in the past seven days, a slight decrease from 4% in 2017. The survey found that 2% of those aged 11-15 years old (45 individuals) had spent money on scratchcards in the past 7 days.

However, of the 11-15 year olds who reported buying National Lottery tickets or scratchcards (retail products) in the past, 62% said a parent or guardian handed over the money at the till.

There are strict age verification requirements in place for both retailers and the National Lottery operator to reduce the risk of underage play. However, increasing the minimum age to purchase some or all National Lottery games may further reduce the already low risk of children and young people (those aged 15 and below) being successful in purchasing National Lottery games from retail outlets. An increase to the minimum age may also alter the behaviour and perception of parents or guardians when buying National Lottery games for children and young people below the age limit.

Public opinion

Attitudes towards the National Lottery are measured by the Gambling Commission's survey. In October 2018, respondents to the survey were asked whether 16 and 17 year olds should be able to play the National Lottery and in November 2018 the survey explored whether these views were different by game type.

In the October 2018 survey, 57% of respondents disagreed that "16 and 17 year olds should be able to play the National Lottery" and in the November 2018 survey 67% of respondents did not believe that 16 and 17 year olds should be able to play any National Lottery games.

Qualitative research carried out on behalf of the Gambling Commission by Revealing Reality, interviewed a range of young people in order to understand playing habits and what influences young people's play. Although based on a small survey of young people, one of the anecdotal findings reported was that "young people typically stuck to how much they were spending on the draw based games, however scratchcard playing was more likely to prompt additional spend". Some of those surveyed believed that the pace of draws is key to limiting the risk associated with playing the National Lottery.

The survey data suggests that the majority of people did not support 16 and 17 year old play of National Lottery games. While this is not quantitative evidence of risk of harm to 16 and 17 year olds from playing the National Lottery, the finding should be considered in view of the National Lottery's special status as a mass participation activity in the UK, often considered part of the fabric of UK life.

Policy Options

The consultation sets out three options for the minimum age level for National Lottery games:

Option 1 - Do nothing, retain the minimum age of 16 for all National Lottery games

Option 2 - Raise the minimum age to 18 for National Lottery instant win games (i.e. scratchcards and online instant win games)

Option 3 - Raise the minimum age to 18 for all National Lottery games

The government welcomes views on each of the options outlined above. We also invite information on any associated costs or impacts resulting from potential changes and any further evidence that is relevant.

'More likely' Option

We wish to adopt a proportionate, precautionary approach with a view to protect 16 and 17 year olds from possible or future harm. The initial position, based on the evidence examined in the consultation, is to raise the minimum age to 18 for instant win games (scratchcards and online instant win games) and maintain the 16 limit for draw-based games (**Option 2** above), but we welcome views on this approach.

Subject to the outcome of consultation, changes to the minimum age would be implemented in parallel with the start of the fourth National Lottery licence in 2023. Looking ahead, the government believes it is important that there is parity on the minimum age for comparable society lottery products. We intend to consider this, in consultation with the industry.

Costs and Benefits

This Impact Assessment identifies both monetised and non-monetised impacts on individuals, groups and businesses in the UK, with the aim of understanding what the overall impact on society might be from implementing the proposed option. The costs and benefits of each proposal are compared to Option 1, the Do Nothing case where the minimum age for lottery games stays the same.

Figure 5. Total Sales Revenue for Lottery Games 2017/18

	Revenue (2017/18)	Source
Scratchcard total sales	£2.49 bn	Gambling Commission (from Camelot Data)
Online instant win games total sales	£0.39 bn	Gambling Commission (from Camelot Data)
Draw-Based Games Retailer total sales	£2.88 bn	Gambling Commission (from Camelot Data)
Draw-Based Games Online total sales	£1.28 bn	Gambling Commission (from Camelot Data)

Figure 6. Sales Revenue from 16-17 year old play, 2017/18

	Revenue (2017/18)	Source
Draw-based games sales revenue	£14.98m	Gambling Commission (from Camelot Data)
Scratchcards sales revenue	£31.79m	Gambling Commission (from Camelot Data)
Online instant win games sales revenue	£0.19m	Gambling Commission (from Camelot Data)

There is a general trend of sales revenue falling for 16-17 year play over the last 4 years, but without sufficient historic data available before 2014, this is insufficient to forecast a future trend. Therefore, we assume that the sales revenue figures shown in **Figure 5.** are fixed over the 10 year appraisal period. This bears the caveat that sales might differ in reality.

Sales revenue is apportioned into the following categories:

- **Prizes:** A percentage of sales revenue is put into prize money for the National Lottery games.
- **Good cause returns:** The money generated by the National Lottery funds arts, heritage, sport, community and voluntary projects all over the UK as well as supporting projects concerned with health, education and the environment. Over 565,000 projects, large and small, have benefited from National Lottery funding. Payments to good causes are made to the National Lottery Distribution Fund (NLDF) on behalf of the Secretary of State for Culture, Media and Sport, who oversees the fund. The Gambling Commission make sure that the payments to the Secretary of State are accurate and on time.¹⁴ A small proportion of returns to good causes (less than 0.25%

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<https://www.gamblingcommission.gov.uk/news-action-and-statistics/Statistics-and-research/Statistics/National-Lottery-sales-and-good-causes-reporting.aspx>

in 2017)¹⁵ go to support the operational costs of running the National Lottery (principally to the Gambling Commission and to a lesser extent DCMS).

- **Retailer Commission:** Retailers who sell National Lottery tickets and scratchcards make a commission on sales.
- **Lottery Duty:** This is the tax to the exchequer. As laid out in the green book, we do not consider this cost to be in scope for net present values and therefore do not consider it in the economic figures in this impact assessment
- **Camelot Profits:** This is the profit the National Lottery operator are entitled to from running the lottery game in question.
- **Camelot Costs:** This is the amount that the National Lottery operator are entitled to, to cover their costs. We treat this as neutral when estimating costs below, because, without being able to sell to 16-17 year olds, the cost of providing services and printing tickets / scratchcards for these customers will be nullified.

National Lottery sales vary considerably by week, month and year. Analysis indicates that there are multiple drivers of sales. For example, higher jackpots tend to lead to higher ticket sales. Due to the nature of the National Lottery the number of rollovers and subsequent higher jackpots is random so the volume of National Lottery sales each year will vary. The options considered will reduce the income for the beneficiaries of National Lottery sales, however, fluctuation in sales, and therefore good cause income, retailer commission, operator profits etc., are an expected part of this system and associated groups are familiar and prepared to deal with these fluctuations. Therefore, although there will be some costs to business it will not cause much, if any, structural disruption in relation to a reduction in revenue from National Lottery sales.

Figure 7. Breakdown of sales revenue from different games (2017/18).

	Prizes	Good Cause returns	Lottery Duty	Retailer Commission	Camelot Profits	Camelot Costs
Draw-based games (Retailers) [%]	49	27.7	12	4.8	4.7	1.7
Draw-based games (Online) [%]	48.8	34	12	0	3.4	1.8
Scratchcards [%]	68.3	9.1	12	6.2	1.6	2.8
Online instant win games [%]	70.6	13.2	12	0	2.2	1.9

Figure 8. Revenue Sales to 16-17 year olds - breakdown (2017/18)

Breakdown	Prizes	Good cause returns	Lottery Duty	Retailer Commission	Camelot Profits	Camelot Costs
Draw based games (Retailer &	£7.3m	£4.1m	£1.8m	£0.7m	£0.7m	£0.3m

¹⁵

Online)						
Scratchcards	£21.7m	£2.9m	£3.8m	£2.0m	£0.5m	£0.9m
Instant Win games	£0.1m	£0.0m	<£0.1m	£0.0m	<£0.1m	<£0.1m

Figures rounded to the nearest £0.1m

Caveat

We obtained an aggregated sales figure for draw-based games for 16-17 year olds but were unable to obtain a breakdown between online and retail sales. Therefore, in our calculations, we have assumed that all draw-based game sales for 16 and 17 year olds were from retailers, and used the equivalent proportions to estimate the cost to business. This will create an overestimate of the cost to the retailer from the impact of this policy because there is no retailer commission associated with online sales, which will have likely been part of the proportion of the overall draw-based sales to 16 and 17 year olds. However, the overall cost to business will be broadly similar based on this assumption. The proportion returned to good causes from online sales of National Lottery games is greater than for retailers. The majority of the commission that would have been apportioned to the retailer is instead returned to good causes, which are a factor in the overall cost to business analysis.

Option 2

Costs

Transition Cost

There could be a transition cost to the National Lottery operator and retailers following a change to the minimum age for National Lottery instant win games being implemented. There will be a familiarisation cost associated with ensuring retailers are now using the right age requirement. This is likely to be a low cost but across a large number of retailers (every retailer that sells National Lottery scratchcards). We do not anticipate this would be significant for retailers, considering all should verify age when selling National Lottery tickets, and, the minimum age for alcohol and tobacco is 18 (often also sold by the retailer) which requires age verification. There may also be costs to the operator and/or the retailers, associated with new signage - e.g. minimum age warnings on products, in store. As set out in the consultation, the government is minded that any changes to the minimum age for playing National Lottery games would come into force at the same time as the commencement of the fourth National Lottery licence in 2023. This would minimise any associated costs to business and to the operator. It is not possible to estimate these costs as the conditions of the 4th National Lottery licence are not yet confirmed. These costs would probably be small unit costs but across a large number of retailers. As age verification is part of the status quo there will be no additional ongoing costs further to the transition costs. Due to lack of data, we have not monetised transition costs at this stage, but we will use the consultation to gather more information for the final stage impact assessment.

Annual Cost

Figure 8. shows the annual cost of introducing a new minimum age of 18 for National Lottery products excluding draw-based games. These costs are the summation of lost revenue from scratchcards and instant win game sales to 16 and 17 year olds.

Figure 9. Annual cost of Option 2

	Good cause returns	Lottery Duty	Retailer Commission	Camelot Profits
Who bares the cost	Charities	Exchequer	Retailers	Operator
Total 16 - 17 play	£2.9m	£3.8m	£2.0m	£0.5m

Figure 10. Option 2 Annual Cost and Net Present Value (2019 prices and 2023 present value base year)

Cost	Annual Cost	Net Present Value (10 year appraisal period)
Operator	£0.5m	£4.4m
Charities	£2.9m	£25.1m
Retailers	£2.0m	£17.0m
Exchequer	£3.8m	n/a*

Benefits

It is difficult to monetise the benefits to society as there are several limitations to the available data for considering the prevalence of problem-gambling from 16 and 17 year olds playing the National Lottery. The problem gambling rates from the Health Survey do not give a breakdown by age for National Lottery players and are not mutually exclusive from other activities. The Health Survey also does not consider the problem gambling rates for players of online instant win games.

The most significant non-monetised benefits are the benefits to society from the potential decrease in the risk of problem gambling in 16 and 17 year olds. Adolescence is a key stage of development and any harms experienced at this stage in life can be detrimental to the future development, confidence and potential of young people. It is very difficult to accurately quantify the benefits from this policy. However, given the social costs of gambling-related harm we expect any action taken to limit the prevalence or harm from 16 and 17 year olds gambling and, therefore, to have significant positive social benefits. These benefits would be seen both now and in the future as this policy would target a young age group.

Option 3

Costs

Transition Cost

There would be a transition cost to the National Lottery operator and retailers following a change to the minimum age for all National Lottery games being implemented. There will be a familiarisation cost associated with ensuring retailers are now using the right age requirement. This is likely to be a low cost but across a large number of retailers (every retailer that sells National Lottery products). We do not anticipate this would be significant for retailers, considering all should verify age when selling National Lottery tickets, and, the minimum age for alcohol and tobacco is 18 (often also sold by the retailer) which requires age verification. There may also be costs to the operator and/or the retailers, associated with new signage - e.g. minimum age warnings on products, in store. As set out in the consultation, the government is minded that any changes to the minimum age for playing National Lottery games would come into force at the same time as the commencement of the fourth National Lottery licence in 2023.

This would minimise any associated costs to business and to the operator. It is not possible to estimate these costs as the conditions of the 4th National Lottery licence are not yet confirmed. As age verification is part of the status quo there will be no additional ongoing costs further to the transition costs. Due to lack of data, we have not monetised transition costs at this stage, but we will use the consultation to gather more information for the final stage impact assessment.

Annual Cost

Figure 11. shows the annual cost of introducing a new minimum age of 18 for all National Lottery products. These costs are the summation of lost revenues from the sale of draw-based games, scratchcards and online instant win games to 16 and 17 year olds.

Figure 11. Annual Cost of Option 3

	Good cause returns	Lottery Duty	Retailer Commission	Camelot Profits
Who bears the cost	Charities	Exchequer	Retailers	Operator
Cost	£7.1m	£5.6m	£2.7m	£1.2m

Figure 12. Costs and Net Present Value (2019 prices and 2023 present value base year)

Cost	Annual Cost	Net Present Value (10 year appraisal period)
Operator	£1.2m	£10.5m
Charities	£7.1m	£60.8m
Retailers	£2.7m	£23.2m
Exchequer	£5.6m	n/a*

**As specified in the Green Book, we will not consider the cost to the exchequer in this impact assessment NPVs. Figures rounded to the nearest £0.1m*

Benefits

It is difficult to monetise the benefits to society as there are several limitations to the available data for considering the prevalence of problem-gambling from 16 and 17 year olds playing the National Lottery. The problem gambling rates from the Health Survey do not give a breakdown by age for National Lottery players and are not mutually exclusive from other activities. The Health Survey also does not consider the problem gambling rates for players of online instant win games.

The most significant non-monetised benefits are the benefits to society from the potential decrease in the risk of problem gambling in 16 and 17 year olds. Adolescence is a key stage of development and any harms experienced at this stage in life can be detrimental to the future development, confidence and potential of young people. Given the social costs of gambling-related harm, we expect any action taken to limit the prevalence or harm from 16 and 17 year olds gambling to have significant positive social benefits. These benefits would be seen both now and in the future as this policy would target a young age group.

Summary

Figure 13. Summary Table

	Transition Cost	Annual Cost	Net Present Value	EANDCB (2016 prices, 2017 base year)
Option 1 (Do nothing)	£0.0m	£0.0m	£0.0m	£0.0m
Option 2 ('More likely' option)	not monetised	£5.4m	−£46.5m	£4.1m
Option 3	not monetised	£11.0m	−£94.5m	£8.4m

Business Impact

The assumed cost to business are:

- Good cause returns
- Retailer Commission
- Camelot Profits

There is no evident trend in National Lottery sales over the last 10 years so we have used the figures from the 2017/18 as a proxy for 2023.

Figure 14. Business Impacts of option 2 ('more likely' option)

Option 2	Business Impacts		
Business Impacts	Good cause returns	Retailer Commission	Camelot Profits
Scratchcards	£2,900,000	£2,000,000	£500,000
Instant Win games	<£100,000	£0	<£100,000
Total (£m)	£5,400,000		

Figures rounded to the nearest £100,000, figures might not sum due to rounding

Figure 15. Business Impacts of option 3

Option 3	Business Impacts		
Business Impacts	Good cause returns	Retailer Commission	Camelot Profits
Draw based games	£4,100,000	£700,000	£700,000
Scratchcards	£2,900,000	£2,000,000	£500,000
Instant Win games	<£100,000	£0	<£100,000

Total (£m)	£11,000,000
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Civil Society business impact

The National Lottery Distribution Fund (NLDF) was established in the National Lottery etc Act 1993. Its purpose is to receive and hold monies generated by the National Lottery for Good Causes. The money is held for onward distribution by the 12 National Lottery distributors. These 12 distributors are listed below along with the relative proportion of good cause income received by each distributor and the associated costs from the relevant policy options. The proportions for the distribution of good cause income is set out in legislation.

Figure 16. Distribution of good cause income and associated costs

Distributor	Entitlement under Act	Option 2 ('more likely' option)	Option 3
National Lottery Community Fund (UK)	40%	£1,160,000	£2,800,000
National Lottery Heritage Fund (UK)	20%	£580,000	£1,400,000
UK Sport (UK)	4.56%	£132,240	£319,200
Sport England	12.4%	£359,600	£868,000
Sport Scotland	1.62%	£46,980	£113,400
Sport Wales	0.9%	£26,100	£63,000
Sport Northern Ireland	0.52%	£15,080	£36,400
British Film Institute (UK)	2.7%	£78,300	£189,000
Arts Council England	13.96%	£404,840	£977,200
Arts Council Wales	1%	£29,000	£70,000
Arts Council NI	0.56%	£16,240	£39,200
Creative Scotland	1.78%	£51,620	£124,600
Total	100%	£2,900,000	£7,000,000

The distributors of National Lottery funding then award grants to individual charities and organisations to support a variety of projects in community life, heritage, sport and the arts. The reduced income from National Lottery sales from a change to the minimum age will likely result in an impact on the organisations funded by the distributors, some of which may be small organisations. However, it should be noted that given the relatively small impact on good cause returns of all options, this will not affect any organisations that have already had grants awarded. The impact would manifest in the availability and amount of the grants that could be offered by the distributors in the future rather than on the current grant recipients.

As stated previously, the National Lottery income often fluctuates and the distributors are able to deal with and plan for the likely variance in income year-on-year. DCMS and the Gambling Commission share sales data with distributing bodies and projections for National Lottery good cause returns. DCMS also

committed in a response to the PAC report in June 2018 to work with the distributors to test their modelling of future grants and intervene where programmes become unaffordable.

This policy would cause a reduction in income (estimated in the tables above) but it is very unlikely to significantly affect the structure of these organisations as they plan for variance in National Lottery income.

There may be a small net benefit to distributors from a proportionate reduction on administrative costs. However, each distributors finances are unique and it is therefore difficult to assess the relative administrative costs for each distributor. Some of the National Lottery distributors receive multiple funding streams and it is difficult to estimate what proportion of administrative costs are therefore funded by National Lottery good cause returns.

SaMBA (Small and Micro Business Assessment)

The operator of the National Lottery is a large organisation so we do not consider their costs when assessing the impact on small and micro businesses. Camelot were able to provide granular information on the retailers who sell National Lottery products, including a breakdown of independent retailers vs larger chains / supermarkets.

Figure 17. Cost to retailers from option 2 and option 3.

	Option 2	Option 3
Total Cost to retailers	£2.0m	£2.7m

Figures rounded to the nearest £0.1m

Figure 18. Retailers who sell lottery products

Total number of retailers	45,263
Total number of independent retailers (Micro)	24,696 (54.6%)
Total number of non-independent retailers	20,567(45.4%)

Caveat: without having the data necessary to forecast how many retailers will sell National Lottery products in 2023, we assume the figures from 2019 are fixed for 2023 and thereafter.

Without being able to obtain sales data by retailer type, we assume the annual cost to retailers is evenly distributed. This gives the average annual cost to independent retailers (assumed to be small and micro businesses) of £1.1m (rounded to the nearest £100,000), which represents a cost of £44 per independent retailer per year. Whilst there are more independent (small / micro) retailers who sell National Lottery products, there isn't a significantly disproportionate impact on them and the cost per retailer is relatively small. We are clear that the policy objectives outlined above justify the cost per small/micro retailer.

Figure 19. Cost to small/micro businesses (Independent retailers)

	Option 2 ('More likely' option)	Option 3
Cost to independent retailers	£1.1m	£1.5m

Cost per retailer	£44	£59
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Rounded to the nearest £0.1m, cost per retailer rounded to the nearest £1

We have considered the following mitigation options for small and micro business, which we will not be taking forward.

- Full exemption - This is not considered appropriate. Allowing up to 54% of retailers to continue to offer scratchcards to 16-17 year olds would be detrimental to the aim of the policy to take precautionary action to protect young people from possible or future harm, from the point of implementation. An exemption for small and micro businesses would create a two tier system for retailers, creating an inconsistent regulatory regime, which would pose challenges for regulation and create confusion for consumers.
- Partial exemption - This is not a relevant option for this policy, as any form of exemption would have the same consequences as those set out above
- Temporary exemption - as above (To note: the planned implementation date is 2023)
- Different requirements by firms size - as above
- Financial aid - not applicable
- Opt-in and voluntary solutions - In this case, the use of a voluntary system would not align with the aims of the potential changes which would prevent play of National Lottery games by 16 and 17 year olds who may be at risk of gambling related harm and it would have the potential to create a disparity in the minimum age between different retailers. The National Lottery is regulated by the Gambling Commission and there are currently robust measures in place to protect young people from gambling-related harm including checks on retailers carried out by the operator on their compliance with age verification standards and thorough online verification. It is important that there is a clear policy for the minimum age so that the Gambling Commission can effectively regulate the National Lottery and the operator can ensure that the more than 45,000 retailers are carrying out the required checks. Therefore, we don't believe further consideration of voluntary solutions is viable.