

The National Lottery: Why change is needed to reduce gambling harm

Policy paper

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1. Overview

Our policy is that **the National Lottery, as a matter of urgency, should signpost to gambling support services, such as GambleAware, on its advertising as well as its products.**

The National Lottery has a critical role in preventing and reducing gambling harm over the next decade due to the widespread reach of its advertising and products. Signposting to appropriate support will assist in fulfilling Allwyn's ambition to prioritise player safety.

Signposting was recommended by the House of Commons Culture, Media and Sport Select Committee in 2022 stating: *"with immediate effect, all National Lottery products should carry GambleAware branding"*. It is also a minimum standard on the advertising of other charity lotteries and there is no justification for excluding the National Lottery. We also know that signposting to support on both products and advertising is widely supported by the public and will help to normalise support seeking and increase awareness and uptake of the advice, tools and support offered.

2. Executive summary

The National Lottery has been a fixture of British life for many years and is widely viewed as a national treasure and a force for good. Since the first draw in 1994, the National Lottery has raised over £50 billion for good causes and awarded over 700,000 individual grants to projects and organisations, making a real difference to local communities¹.

Participation in the National Lottery is a lower-risk form of gambling, but it is not entirely risk-free. Around 1 in 25 people (3.9%) who take part in the National Lottery draw are experiencing 'problem gambling' (defined as a PGSI score of 8+)². Importantly, however, participation in the National Lottery draw is so common that the comparatively low rate of harm still equates to a very large number of people. Research suggests that there are an estimated 600,000 people experiencing 'problem gambling' who take part in the National Lottery Draw³, making it the gambling product able to reach the highest volume of people experiencing gambling harm. This reach is increased even further by other National Lottery products with higher rates of individuals experiencing 'problem gambling' (PGSI 8+), such as scratch cards (7.7%) and instant-win games (8.2%)⁴.

¹ The National Lottery, "Where the money goes": <https://www.national-lottery.co.uk/life-changing/where-the-money-goes>

² Gambling Survey for Great Britain - Annual report (2023): Official statistics
<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/statistics-on-gambling-participation-annual-report-year-1-2023-official>

³ Relative risk of gambling products within Great Britain: Findings from a multi-phased literature review and secondary analysis project.
<https://www.gambleaware.org/our-research/publication-library/articles/relative-risk-of-gambling-products-within-great-britain-findings-from-a-rapid-literature-review-and-secondary-analysis-project/>

⁴ Gambling Survey for Great Britain - Annual report (2023): Official statistics
<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/statistics-on-gambling-participation-annual-report-year-1-2023-official>

The National Lottery operator, Allwyn UK⁵, was the largest spender of any gambling brand on advertising in 2024⁶. Alongside this, its products are the most commonly used in GB⁷. With such a high reach and public trust in the brand, the National Lottery operator could have a substantial positive impact on preventing and reducing harms.

Earlier access to information, resources and support can reduce the likelihood of developing more complex gambling harms and alleviate pressure on treatment services within the NHS and wider third sector. As part of a preventative approach, it is critical to ensure people are aware of the risks of gambling and where to go for support if they need it. Therefore, GambleAware is calling on the National Lottery to play its full part in preventing gambling harms.

Our policy is that the National Lottery, as a matter of urgency, should signpost to gambling support services, such as GambleAware, on its advertising as well as its products. The introduction of this on advertising would be particularly impactful in spreading the reach of signposting to support, as the National Lottery has the highest level of advertising spend than any other gambling brand in Great Britain.

Signposting to gambling support services was recommended by the House of Commons Culture, Media and Sport Select Committee in 2022 stating: “with immediate effect, all National Lottery products should carry GambleAware branding”⁸. It is also a minimum standard on the advertising other charity lotteries⁹ - a comparably lower-risk form of gambling - so there is no justification for excluding the National Lottery. We also know that signposting to support on both National Lottery products¹⁰ and advertising¹¹ is widely supported by the public and will help to normalise support seeking and increase awareness and uptake of the advice, tools and support offered.

3. Introduction to GambleAware

GambleAware is the leading independent charity tackling gambling harms across Great Britain. The charity is the most recognised brand in this space and the GambleAware website offers a seamless support journey for people experiencing gambling harm. Across Great Britain over 3 in 5 (61%) adults are aware of the brand and over 2 in 3 (67%) of these would search

⁵ Please note, to aid readability we have changed Allwyn UK to Allwyn throughout the report. However, Allwyn UK are the operator of The National Lottery

⁶ Figures from adintel and only include spend on Cinema, Digital, Direct Mail, Door Drops, Outdoor, Press, Radio and TV in 2024. As such, these do not include wider marketing (e.g., sponsorships, influencers, ambassadors, partnerships, content marketing, organic social) and as such can be seen as an underestimate of wider marketing spend. Exact figures cannot be provided due to commercial sensitivity.

⁷ Gambling Survey for Great Britain - Annual report (2023): Official statistics

<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/statistics-on-gambling-participation-annual-report-year-1-2023-official>

⁸ What next for the National Lottery? <https://publications.parliament.uk/pa/cm5803/cmselect/cmcmums/154/report.html#heading-5>

⁹ Industry Group for Responsible Gambling (IGRG) Code for Socially Responsible Advertising. <https://bettingandgamingcouncil.com/members/igrig>

¹⁰ Treatment and support survey 2024. Data not publicly accessible beyond this report. Full report to be published in 2025. Data from online survey of 17,933 adults aged 18+ in GB. 74% Agree that “National Lottery products should include the GambleAware logo and signpost to the GambleAware website”

¹¹ Treatment and support survey “mini-dip” May 2023. Data not publicly accessible beyond this report. Data from online survey of 3,002 adults aged 18+ in GB. 69% Agree that “Adverts for the National Lottery should include the BeGambleAware.org logo, like other gambling adverts do”

GambleAware for advice, tools and support¹². GambleAware is working with the new commissioning system to ensure these critical assets are included as part of the smooth transition to the future system¹³.

Gambling harms are a serious public health issue which can affect anyone, and the prevention of harm cannot succeed without changes to the wider environment. GambleAware has developed this policy paper in line with its public health approach to addressing gambling harms.

4. Introduction to Gambling Harms

Official statistics from the Gambling Commission¹⁴ show that 2.5% of adults in GB are experiencing ‘problem gambling’ (Problem Gambling Severity Index (PGSI) score of 8+¹⁵), with separate estimates from GambleAware suggesting that up to 4.8 million adults in GB may be experiencing ‘problem gambling’ (PGSI 8+) or have been negatively impacted by someone else’s gambling¹⁶. In addition, up to 1.65 million children are growing up in households where an adult is experiencing ‘problem gambling’¹⁷.

The impact of gambling can be significant and may damage health and wellbeing. It creates serious risks of financial difficulties, breakdown of relationships, mental and physical health problems, and sadly in some cases, suicide¹⁸. Harms are often suffered not just by those who gamble, but by friends, family¹⁹ and wider society²⁰.

Gambling harms also contribute to wider health inequalities²¹: people in the most deprived areas are more than twice as likely to experience ‘problem gambling’ compared to those in the least deprived²², while religious and ethnic minority communities are also disproportionately

¹² GambleAware Brands Tracker 2025. Report not publicly available. Data from online survey of 3,022 individuals aged 16-65 in GB.

¹³ GambleAware's National Prevention Programme Assets

<https://www.gambleaware.org/media/ccwiy5ml/national-prevention-programme-assets-summary-may-2025.pdf>

¹⁴ Gambling Survey for Great Britain - Annual report (2023): Official statistics

<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/statistics-on-gambling-participation-annual-report-year-1-2023-official>

¹⁵ Problem gambling screens: <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/problem-gambling-screens>

¹⁶ Treatment and Support Survey 2023. GambleAware data has been rather than the Gambling Commission official statistics due to guidance suggesting that the current official statistics should not be grossed up to a population level.

<https://www.gambleaware.org/our-research/publication-library/publication-library/annual-gb-treatment-and-support-survey-2023/>

¹⁷ GambleAware Annual GB Treatment and Support Survey 2023.

<https://www.gambleaware.org/our-research/publication-library/publication-library/annual-gb-treatment-and-support-survey-2023/>

¹⁸ Gambling-related harms evidence review: summary

<https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary--2>

¹⁹ Annual GB Treatment and Support Survey 2023

<https://www.gambleaware.org/our-research/publication-library/articles/annual-gb-treatment-and-support-survey-2023/>

²⁰ The Fiscal Costs and Benefits of Problem Gambling: Towards Better Estimates

<https://niesr.ac.uk/publications/fiscal-costs-benefits-problem-gambling?type=report>

²¹ Gambling-related harms evidence review: summary

<https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary--2>

²² GambleAware Annual GB Treatment and Support Survey 2024. Report not publicly available until later in 2025.

more likely to be affected²³. Effective prevention will help counter these inequalities and support ambitions to tackle the cost-of-living crisis and grow the economy²⁴.

The Government White Paper ‘High Stakes: Gambling Reform for the Digital Age’²⁵, published in April 2023, set out a raft of policy changes to reduce the impact of gambling harms in GB. GambleAware welcomed this substantial package of measures, including the introduction of the statutory levy, but stated that the lack of greater regulation on gambling advertising and marketing was a missed opportunity, particularly in regard to protecting children and young people^{26,27}. Whilst most gambling operators are licensed and regulated through the 2005 Gambling Act, the National Lottery falls under separate legislation which was not in scope for the aforementioned White Paper²⁸.

5. Introduction to the National Lottery

The National Lottery is widely viewed as a national treasure and a force for good. Since the first draw was held in 1994, the National Lottery has raised over £50 billion for good causes and awarded over 700,000 individual grants to projects and organisations, making a real difference to local communities²⁹. This includes funding grassroots sports (including supporting Paralympic and Olympic athletes), arts and heritage, health, education and entertainment.

The previous operator of the National Lottery, Camelot, faced criticism in light of the National Lottery draw-based ticket sales and donations to good causes falling whilst Camelot’s profits rose^{30,31}. The most recent 4th Licence was designed to better align returns to good causes and profits, while protecting the unique status of the National Lottery³². This licence was awarded to Allwyn UK who committed to delivering growth and innovation across the National Lottery’s products and channels, in an attempt to increase contributions to good causes³³. A debate in

²³ Minority Communities & Gambling Harms, Qualitative and Synthesis Report: Lived Experience, Racism, Discrimination and Stigma

<https://www.gambleaware.org/our-research/publication-library/publication-library/minority-communities-gambling-harms-qualitative-and-synthesis-report/>

²⁴ How can the next government take prevention from rhetoric to reality?

<https://www.health.org.uk/publications/long-reads/how-can-the-next-government-take-prevention-from-rhetoric-to-reality>

²⁵ High Stakes: Gambling Reform for the Digital Age

https://assets.publishing.service.gov.uk/media/644923b5814c6600128d0723/1286-HH-E02769112-Gambling_White_Paper_Book_Accessible1.pdf

²⁶ GambleAware response to the Gambling White Paper

<https://www.gambleaware.org/what-we-do/news/news-articles/gambleaware-response-to-the-gambling-white-paper/>

²⁷ Gambling marketing in Great Britain: What needs to change and why?

<https://www.gambleaware.org/our-research/publication-library/publication-library/gambling-marketing-in-great-britain-what-needs-to-change-and-why/>

²⁸ Gambling regulation. Second Report of Session 2023–24

<https://committees.parliament.uk/publications/42630/documents/211944/default/>

²⁹ The National Lottery, “Where the money goes”: <https://www.national-lottery.co.uk/life-changing/where-the-money-goes>

³⁰ What next for the National Lottery? <https://publications.parliament.uk/pa/cm5803/cmselect/cmcmcds/154/report.html>

³¹ Specifically, between 2012 and 2022 there was a 17% increase in total sales alongside a 3% reduction in funding to good causes

Industry Statistics - February 2024 - Correction: Official statistics

<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/industry-statistics-february-2024-correction>

³² The current National Lottery licence <https://www.gamblingcommission.gov.uk/public-and-players/guide/licence-to-run-the-national-lottery>

³³ Fourth National Lottery Licence begins with Allwyn as new operator

<https://www.gamblingcommission.gov.uk/news/article/fourth-national-lottery-licence-begins-with-allwyn-as-new-operator#:~:text=Allwyn%20has%20committed%20to%20investment,protection%20of%20participants%20and%20propriety.>

the House of Lords earlier this year revealed how Allwyn has struggled to achieve this increased contribution to good causes³⁴.

6. Why should Allwyn place more focus on reducing gambling harms?

The new 10-year licence gives Allwyn the opportunity to go further than its predecessor³⁵ and take a world-leading approach to preventing and reducing gambling harm. Allwyn has stated³⁶ that “player safety is our top priority”, with an “ambition to set a benchmark for world-class player safety in digital-first lottery play”. This is even more important given Allwyn’s stated objectives to double income from £30 million to £60 million each week: “We want millions more people playing a little, attracting new players and bringing back those who used to play, while also energising The National Lottery’s existing player base”³⁷.

Allwyn has the opportunity to deploy the following features of the National Lottery for the public good in preventing gambling harm:

High levels of National Lottery marketing spend and advertising recall among the public:

- The National Lottery is a significant contributor of gambling advertising, with more spent on advertising the National Lottery each year than any other gambling brand in GB³⁸.
- There are growing calls for gambling marketing to be restricted³⁹ given the strong evidence that gambling advertising increases participation and therefore risk⁴⁰; exacerbates harm⁴¹; and normalises gambling as just a bit of ‘harmless fun’ particularly amongst children⁴².
- Children and young people are most likely to recall seeing an advert or promotion about lotteries than any other type of gambling⁴³.

High levels of National Lottery product usage:

³⁴ National Lottery: Contribution to Good Causes <https://hansard.parliament.uk/Lords/2025-02-10/debates/47121941-150E-45E3-B18A-FEA6409A467A/details>

³⁵ The Fourth National Lottery Licence begins <https://committees.parliament.uk/publications/43207/documents/215037/default/#:~:text=On%201%20February%202024%2C%20Allwyn,from%20long%2Dstanding%20operator%20Camelot.>

³⁶ Player safety and wellbeing sit at the heart of our operations <https://www.allwyn.co.uk/player-protection>

³⁷ Allwyn “How we operate” <https://www.allwyn.co.uk/how-we-operate>

³⁸ Figures from adintel and only include spend on Cinema, Digital, Direct Mail, Door Drops, Outdoor, Press, Radio and TV in 2024. As such, these do not include wider marketing (e.g., sponsorships, influencers, ambassadors, partnerships, content marketing, organic social) and as such can be seen as an underestimate of wider marketing spend. Exact figures cannot be provided due to commercial sensitivity.

³⁹ Gambling marketing in Great Britain: What needs to change and why?

<https://www.gambleaware.org/our-research/publication-library/publication-library/gambling-marketing-in-great-britain-what-needs-to-change-and-why/>

⁴⁰ What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature <https://www.sciencedirect.com/science/article/pii/S0033350622003420>

⁴¹ Ipsos research explores barriers to opening up about experiencing problems with gambling <https://www.ipsos.com/en-uk/ipsos-research-explores-barriers-opening-about-experiencing-problems-gambling>

⁴² The Effect of Gambling Marketing and Advertising on Children, Young People and Vulnerable People: Qualitative Research Report

<https://www.gambleaware.org/our-research/publication-library/publication-library/the-effect-of-gambling-marketing-and-advertising-on-children-young-people-and-vulnerable-people-qualitative-research-report/>

⁴³ Young People and Gambling 2023: Official statistics

<https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-2023/ypg-2023-attitudes-towards-and-exposure-to-gambling-content-of-gambling>

- The gambling products provided by the National Lottery are widely used within GB. In the last 4 weeks, 31% of adults have bought a ticket for The National Lottery Draw, 12% a National Lottery Scratchcard, and 5% a National Lottery Instant-Win Game⁴⁴.
- In Great Britain, there could be up to 600,000 people experiencing 'problem gambling' (a PGSI score of 8+) who take part in the National Lottery draw⁴⁵. This makes it the gambling product able to reach the highest volume of people experiencing harms.
- Around 1 in 12 adults in the UK have downloaded the National Lottery app⁴⁶.

High levels of National Lottery brand awareness and trust:

- The National Lottery has been a fixture of British life for many years and is widely viewed as a national treasure and a force for good⁴⁸. Almost all (97%) of the public have heard of the National Lottery and half of adults have a positive perception towards it⁴⁹.
- The public are more likely to take action when messages come from trusted sources such as the National Lottery⁵⁰.

7. Core policy

7.1 Summary

Due to the reach of its advertising, products and high level of public trust in the brand outlined in the previous section, the National Lottery could have a substantial positive impact on preventing and reducing gambling harms through better embedding of safer gambling messaging in its advertising and products. Allwyn was the largest spender of any gambling brand on advertising in 2024⁵¹ and amongst those who participated in gambling, the National Lottery was the most commonly reported activity⁵². As such, the National Lottery's platform has a unique opportunity to inform the public about the potential risk of gambling harms, normalise

⁴⁴ Statistics on gambling participation – Annual report Year 1 (2023): Official statistics

<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/statistics-on-gambling-participation-annual-report-year-1-2023-official>

⁴⁵ Relative risk of gambling products within Great Britain: Findings from a multi-phased literature review and secondary analysis project.

<https://www.gambleaware.org/our-research/publication-library/articles/relative-risk-of-gambling-products-within-great-britain-findings-from-a-rapid-literature-review-and-secondary-analysis-project/>

⁴⁶ Communications Market Report 2023: Interactive data -> Online -> Online use – websites & apps -> Top smartphone apps

<https://www.ofcom.gov.uk/research-and-data/multi-sector-research/cmr/2023/interactive>

⁴⁷ Based on adult population (18+) of 53,646,829 from Mid-2022 edition. Estimates of the population for the UK, England, Wales, Scotland, and Northern Ireland

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

⁴⁸ What next for the National Lottery? <https://publications.parliament.uk/pa/cm5803/cmselect/cmcmuceds/154/report.html#heading-1>

⁴⁹ Explore the latest public opinion about National Lottery. Data from Q3 2024 https://yougov.co.uk/topics/society/explore/brand/National_Lottery-Brand

⁵⁰ Enabling behaviour change – information pack

<https://www.gov.uk/government/publications/transport-business-case/enabling-behaviour-change-information-pack>

⁵¹ Figures from adintel and only include spend on Cinema, Digital, Direct Mail, Door Drops, Outdoor, Press, Radio and TV in 2024. As such, these do not include wider marketing (e.g., sponsorships, influencers, ambassadors, partnerships, content marketing, organic social) and as such can be seen as an underestimate of wider marketing spend. Exact figures cannot be provided due to commercial sensitivity.

⁵² Gambling Survey for Great Britain - Annual report (2023): Official statistics state the mean number of activities for those who had participated in gambling in the past 4 weeks was 2.3 activities. The most commonly reported activities were the National Lottery (31 percent), buying tickets for other charity lotteries (16 percent), and buying scratchcards (13 percent): <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/statistics-on-gambling-participation-annual-report-year-1-2023-official>

support seeking, and signpost effectively to support, particularly given its reach among communities experiencing harms within GB.

Our priority policy, as a matter of urgency, is to call on the National Lottery to signpost to gambling support services, such as GambleAware, on its advertising as well as its products.

More broadly, the National Lottery should be within scope of incoming recommendations arising from the cross-departmental safer gambling messaging group.

7.2 Justification of our core policy on signposting

- Those experiencing ‘problem gambling’ are less likely than those at lower levels of harm to regard the National Lottery as a type of gambling (71% among PGSI 8+ vs 85% among PGSI 0) and are significantly more likely to believe that National Lottery products are harmless (47% among PGSI 8+ vs 20% among PGSI 0)⁵³. This suggests they are less likely to appreciate the potential harm of such products. Clear signposting will help to frame the National Lottery as a form of gambling and make it easier for those who experience or are at risk of harms to understand where to go to for support⁵⁴.
- The House of Commons Culture, Media and Sport Select Committee inquiry on the National Lottery in 2022⁵⁵ stated that “promoting BeGambleAware.org may well assist in signposting these people, or their families, towards treatment services”. It recommended that “with immediate effect, all National Lottery products should carry GambleAware branding”, but the National Lottery is yet to do so. There is widespread public support for such measures, with three quarters (74%) of the public agreeing the National Lottery should signpost to GambleAware on products⁵⁶.
- The lack of signposting to support on advertising materials makes the National Lottery an outlier compared to other charity lotteries (e.g. People’s Postcode Lottery, Health Lottery), which are also a relatively lower-risk form of gambling⁵⁷. Almost seven in ten (69%) of the public agree that adverts for the National Lottery should signpost to GambleAware “like other gambling adverts do”⁵⁸. Signposting helps to normalise support seeking and increases awareness and uptake of the advice, tools and support offered by GambleAware and the wider third sector.

⁵³ Treatment and support survey 2024. Data not publicly accessible beyond this report. Full report to be published in 2025. Data from online survey of 17,933 adults aged 18+ in GB. Agreement that “Participating in the National Lottery is a type of gambling”. Agreement that “the products offered by the National Lottery are harmless in terms of the risk of developing gambling problems”

⁵⁴ What next for the National Lottery? <https://publications.parliament.uk/pa/cm5803/cmselect/cmcmums/154/report.html#heading-5>

⁵⁵ What next for the National Lottery? <https://publications.parliament.uk/pa/cm5803/cmselect/cmcmums/154/report.html#heading-5>

⁵⁶ Treatment and support survey 2024. Data not publicly accessible beyond this report. Full report to be published in 2025. Data from online survey of 17,933 adults aged 18+ in GB. Agreement that “National Lottery products should include the GambleAware logo and signpost to the GambleAware website”

⁵⁷ Statistics on gambling participation – Annual report Year 1 (2023): Official statistics <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/statistics-on-gambling-participation-annual-report-year-1-2023-official>

⁵⁸ Treatment and support survey “mini-dip” May 2023. Data not publicly accessible beyond this report. Data from online survey of 3,002 adults aged 18+ in GB. Agreement that “Adverts for the National Lottery should include the BeGambleAware.org logo, like other gambling adverts do”

- GambleAware is the most recognised and trusted brand in the gambling harms support system⁵⁹. The GambleAware website, serving as a central digital hub, is a coherent 'front-door' to comprehensive advice, tools and support for around 5 million people each year⁶⁰. Many experiencing harms do not seek formal support⁶¹, which is why the GambleAware website aims to support to help people wherever they are in their journey. This includes tools to help people identify whether they are at risk of gambling harm.

7.3 Justification for implementation of health warnings

- Health warnings and specific types of safer gambling messages aim to provide information on the harmful effects of gambling. They are one of the most powerful and cost-effective ways to increase public awareness of health risks⁶².
- This is a low-cost and high-reach intervention that may help to mitigate gambling-related harms in GB⁶³, and an important part of a comprehensive public health approach⁶⁴.
- This intervention is especially important to rebalance gambling exposure to children and young people. Children report a high level of exposure to gambling adverts but are less likely to recall health messaging on them. This shows that health-related messages need to be more commonly used by operators, and more prominent when used⁶⁵.
- Operator-led safer gambling messaging has been shown to lack effectiveness^{66,67}, it can stigmatise those experiencing harms⁶⁸ and can contribute to an increase in gambling⁶⁹.
- There is a critical need for guidelines to be developed independent of industry input. We therefore welcome the Government's cross-departmental working group on safer gambling messaging⁷⁰. The National Lottery needs to be in scope of this workstream to maximise the impact of these efforts. Similar mechanisms are already implemented in

⁵⁹ GambleAware Brands Tracker 2025. Report not publicly available. Data from online survey of 3,022 individuals aged 16-65 in GB.

⁶⁰ GambleAware's National Prevention Programme Assets

<https://www.gambleaware.org/media/ccwiv5ml/national-prevention-programme-assets-summary-may-2025.pdf>

⁶¹ Making Change: Attempts to Reduce or Stop Gambling in a General Population Sample of People Who Gamble <https://pubmed.ncbi.nlm.nih.gov/36061299/>

⁶² Encouraging health warnings on tobacco packaging <https://www.who.int/europe/activities/encouraging-health-warnings-on-tobacco-packaging>

⁶³ Visibility of age restriction warnings, harm reduction messages and terms and conditions: a content analysis of paid-for gambling advertising in the UK.

<https://www.sciencedirect.com/science/article/pii/S0033350620301098?via%3Dihub>

⁶⁴ Public health gambling messaging intervention <https://behsci.prn.nihr.ac.uk/our-projects/public-health-gambling-messaging-intervention/>

⁶⁵ The effect of marketing and advertising on children, young people and vulnerable people Quantitative Research Report

<https://www.gambleaware.org/our-research/publication-library/publication-library/the-effect-of-marketing-and-advertising-on-children-young-people-and-vulnerable-people-quantitative-research-report/>

⁶⁶ "When the Fun Stops, Stop": An analysis of the provenance, framing and evidence of a 'responsible gambling' campaign

<https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0255145>

⁶⁷ Evaluation of the 'take time to think' safer gambling message: a randomised, online experimental study <https://www.cambridge.org/core/services/aop-cambridgecore/content/view/9CFD881028DB7C1CF0E83AD6AEBD67A/S2398063X23000027a.pdf/evaluation-of-the-take-time-to-think-safergambling-message-a-randomised-online-experimental-study.pdf>

⁶⁸ Editorial: Gambling, stigma, suicidality, and the internalization of the 'responsible gambling' mantra

<https://www.frontiersin.org/journals/psychiatry/articles/10.3389/fpsyt.2023.1214531/full>

⁶⁹ Impact of the "when the fun stops, stop" gambling message on online gambling behaviour: a randomised, online experimental study

<https://www.thelancet.com/action/showPdf?pii=S2468-2667%2821%2900279-6>

⁷⁰ High stakes: gambling reform for the digital age

<https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age/high-stakes-gambling-reform-for-the-digital-age>

other European countries such as France⁷¹.



Figure 1. End screen of National Lottery advert in France⁷². Warning message roughly translates as “Gambling involves risks: isolation, debt, etc. Call 09-74-75-13-13 (non-premium rate call).”

- GambleAware has produced independent, robust research-based⁷³ guidelines⁷⁴ with messages that effectively highlight the risks of gambling. The three recommended health warnings are: “Gambling comes at a cost”, “Gambling can be addictive” and “Gambling can grip anyone”.

8. What else should policymakers be aware of?

8.1. Summary of policy

The National Lottery has evolved from being just a lottery draw. There has been a diversification into higher-risk products (e.g. online instant-win games) which could put the public at an increased risk of harm. This is exacerbated by new marketing strategies (e.g. encouraging the gifting of scratch cards), increased accessibility (e.g. online app) and products which may be more appealing among children (e.g. chocolate scented scratchcards).

The National Lottery has a critical role and opportunity to be a world-leading lottery operator in preventing and reducing gambling harm over the next decade. Longer term, GambleAware is calling for:

⁷¹ Decree No. 2010-624 of June 8, 2010 relating to the regulation of commercial communications in favour of gambling and game of chance operators as well as to the information of players regarding the risks associated with gambling <https://www.legifrance.gouv.fr/loda/id/LEGITEXT000022322510/2021-07-21#:~:text=%C2%AB%20Jouer%20comporte%20des%20risques%20%3A%20d%C3%A9pendance,ou%20promotionnel%20qui%20les%20accompagne.>

⁷² FDJ. Faire gagner le jeu responsable <https://www.youtube.com/watch?v=63vXCzplzcE>

⁷³ Executive summary: Improving safer gambling messaging on operator advertising <https://www.gambleaware.org/our-research/publication-library/publication-library/improving-safer-gambling-messaging-on-operator-adverts-executive-summary/>

⁷⁴ GambleAware Safer Gambling Messaging and Signposting Guidelines <https://www.gambleaware.org/tools-and-support/resources-for-professionals/articles/gambleaware-safer-gambling-messaging-and-signposting-guidelines/>

- **Allwyn to ensure that the wider recommendations made by the House of Commons Culture, Media and Sport Select Committee on the National Lottery are implemented.** The recommendations were developed following multi-stakeholder consultation and evidence⁷⁵. They could go a long way to support a reduction in gambling harms if implemented. Allwyn has a clear commitment to be the “safest place to play” and we would welcome an update on progress made.
- **Further attention towards the National Lottery by policymakers.** The exclusion of the National Lottery from the scope of the White Paper review was a missed opportunity to reduce gambling harm, producing inconsistencies in how similar types of product (e.g. online instant-win games), marketing (e.g. safer gambling messaging) and funding of research, prevention, and treatment (e.g. statutory levy) are implemented. Its current exclusion from the statutory levy merits further discussion given it presents a two-tier system of funding that is counter to the ambition of the levy to create a stable, transparent, and long-term funding model for research, prevention, and treatment⁷⁶.

8.2. Evidence in support of further attention on the National Lottery

In particular, we ask that the following issues are considered by the UK Government and Allwyn in future attempts to reduce gambling harms:

- **Increased normalisation, appeal, usage, and harm among children and young people**

There is a **high level of exposure to lottery marketing amongst children and young people**, with over two in five children stating a lottery advert was the most recent type of gambling advert they saw⁷⁷. This marketing **normalises gambling as an everyday activity and something that is both harmless** and enjoyable for children and young people⁷⁸. There is an established link between exposure to gambling in early life, and risk of experiencing harm later in life⁷⁹.

⁷⁵ What next for the National Lottery? <https://publications.parliament.uk/pa/cm5803/cmselect/cmcmds/154/report.html#heading-5>

⁷⁶ Government response to the consultation on the structure, distribution and governance of the statutory levy on gambling operators <https://www.gov.uk/government/consultations/consultation-on-the-statutory-levy-on-gambling-operators/outcome/government-response-to-the-consultation-on-the-structure-distribution-and-governance-of-the-statutory-levy-on-gambling-operators>

⁷⁷ Young People and Gambling 2023: Official statistics <https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-2023/vpg-2023-attitudes-towards-and-exposure-to-gambling-content-of-gambling>

⁷⁸ The Effect of Gambling Marketing and Advertising on Children, Young People and Vulnerable People: Qualitative Research Report <https://www.gambleaware.org/our-research/publication-library/publication-library/the-effect-of-gambling-marketing-and-advertising-on-children-young-people-and-vulnerable-people-qualitative-research-report/>

⁷⁹ Annual GB Treatment and Support Survey 2022 <https://www.gambleaware.org/our-research/publication-library/articles/annual-gb-treatment-and-support-survey-2022/>

“It does concern me a little about how socially accepted it is because it's seen as a good thing generally, but obviously it can sort of lead you further down that sort of rabbit hole into gambling more and more... I feel it could potentially be more dangerous because like with the national lottery and stuff, like kids and children are more exposed to it and they are more impactable at that age”

- Respondent in Treatment and Support Survey 2024 Qualitative Research⁸⁰

The recent launch of **chocolate-scented scratch-and-sniff** cards⁸¹ (see example below) could lead to children finding scratchcards more appealing and being more likely to gamble.



Figure 3. Image of chocolate-scented scratchcards produced by the National Lottery

The recent launch of marketing campaigns **encouraging individuals to gift scratchcards** to loved ones⁸² could also increase gambling among children if gifted. New products, such as Christmas scratchcards that double as gift tags, could appeal to a younger demographic⁸³. This could also result in individuals unknowingly gifting products to those who are experiencing (or have experienced) problems with their gambling, leading to an escalation and/or recurrence of harm. These concerns are furthered by a campaign launching “musical scratchcards” that **looks to make Scratchcards a part of family Christmas traditions**⁸⁴.

⁸⁰ Treatment and support survey 2024. Data not publicly accessible beyond this report. Full report to be published in 2025. Quotes from in-depth interviews.

⁸¹ Scratchcards News <https://www.national-lottery.co.uk/games/gamesstore/scratchcards/scratchcards-news>

⁸² Allwyn: We want to get more young people playing the National Lottery

<https://www.cityam.com/allwyn-we-want-to-get-more-young-people-playing-the-national-lottery/>

⁸³ Allwyn: We want to get more young people playing the National Lottery

<https://www.cityam.com/allwyn-we-want-to-get-more-young-people-playing-the-national-lottery/>

⁸⁴ Musical scratchcards <https://www.vccp.com/work/allwyn/musical-scratchcards>

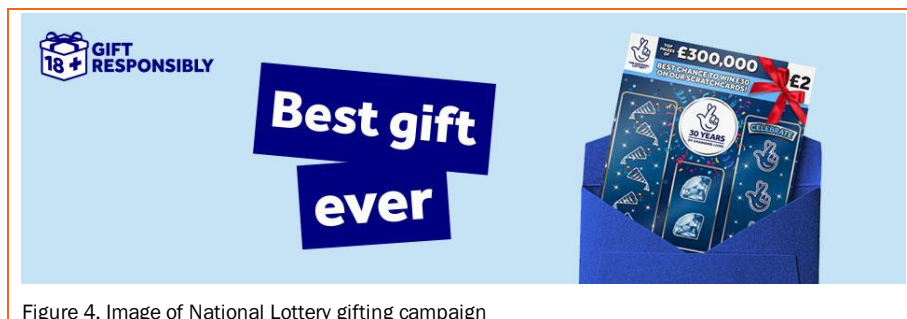


Figure 4. Image of National Lottery gifting campaign

Distribution of in-store kits⁸⁵ that have **features that may be appealing to children and young people** (e.g. bright and engaging colours⁸⁶), alongside consoles and pavement signs which are in the direct eye-line of children, increase exposure and risk of harm to this group. Section 17 of the Committee of Advertising Practice Code clearly states that marketing communications for lotteries should not be directed at those aged under 18 years through the selection of media or context in which they appear⁸⁷.

Those under the age of 18 are gambling on National Lottery products, with 1 in 14 (7%) children aged 11 to 17 reporting to have used one in the past year⁸⁸. There is an **established link between lottery/scratch card use and gambling harms** among 16-24 year-olds⁸⁹.

- **Participation in the National Lottery draw is lower-risk but not completely risk-free; while other National Lottery products (e.g., scratch cards, instant-win games) are not lower-risk**

There are a large number of individuals experiencing ‘problem gambling’ (PGSI 8+) using National Lottery products, with National Lottery scratch cards (7.7%) and instant-win games (8.2%) having higher average rates of ‘problem gambling’ compared to the National Lottery draw (3.9%)⁹⁰. Further research by the Gambling Commission shows that when controlling for socioeconomic and demographic characteristics (e.g. gender, age, ethnicity, income, employment status, and other factors) and gambling behaviours (e.g. frequency, number of activities), the rate of ‘problem gambling’ among users of the National Lottery draw is lower than the average rate among users of other gambling activities (although the difference is only marginally statistically significant). Among users of National Lottery scratchcards and instant-

⁸⁵ Allwyn begins next phase of retail investment with new National Lottery PPOS rollout trial
<https://www.allwyn.co.uk/insights/allwyn-begins-next-phase-of-retail-investment-with-new-national-lottery-ppos-rollout-trial#:~:text=The%20suite%20of%20kit%20includes,local%20National%20Lottery%20funded%20projects.>

⁸⁶ The effect of gambling marketing and advertising on Written by Ipsos MORI on behalf of GambleAware children, young people and vulnerable adults
https://www.gambleaware.org/sites/default/files/2020-12/the-effect-of-gambling-marketing-and-advertising-exec-sum_final.pdf

⁸⁷ CAP Code, point 17, Lotteries <https://www.asa.org.uk/type/non-broadcast/code-section/17.html>

⁸⁸ Young People and Gambling 2023: Official statistics
<https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-2023/vpg-2023-national-lottery-play-summary>

⁸⁹ EXAMINING LOTTERY PLAY & RISK AMONG YOUNG PEOPLE IN GREAT BRITAIN
[https://www.greop.ca/Modules/EvidenceCentre/files/Stark%20et%20al%20\(2021\)_Examining%20lottery%20play%20and%20risk%20among%20young%20people%20in%20GB_Final.pdf](https://www.greop.ca/Modules/EvidenceCentre/files/Stark%20et%20al%20(2021)_Examining%20lottery%20play%20and%20risk%20among%20young%20people%20in%20GB_Final.pdf)

⁹⁰ Statistics on gambling participation – Annual report Year 1 (2023): Official statistics
<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/statistics-on-gambling-participation-annual-report-year-1-2023-official>

win games, the rate of 'problem gambling' is not statistically significantly different to the average rate of harm among users of other gambling activities, after controlling for the same factors.⁹¹

This suggests that **scratchcards and instant-win games should be viewed differently from the lottery draw** as the evidence does not indicate that they are associated with lower rates of harm. This supports wider research showing that the lottery draw, instant-win games, and scratch cards are not necessarily harmless^{92,93}. Scratchcards and instant-win games in particular are felt to be **easy to play and provide instant results**. Some participants note that this makes the games more 'addictive', as they are more engaged, leading them to spending larger amounts of money in hopes to win⁹⁴. Online gambling products have been previously shown to involve a disproportionate share of spend coming from those experiencing moderate gambling problems or above (PGSI 3+⁹⁵), and also make up a disproportionate number of individuals accessing treatment services⁹⁶. The risk of harm from such products could increase given the switchover to a new technology provider to drive new products⁹⁷.

"I registered on the National Lottery app, and I got a bit of a habit with the instant scratch cards on there because they make it so easy for you to play... it did lead me into financial difficulty; I wasn't able to buy food for about a week because I'd spent the food shopping money on scratch cards"

- Respondent in Treatment and Support Survey 2024 Qualitative Research⁹⁸

Individuals are now able to order scratch cards for home delivery via a supermarket or local corner-shop⁹⁹, **increasing the availability of such products and therefore the potential risk of harm**. In particular these products have led to higher spending in "vulnerable" consumers¹⁰⁰,

⁹¹ Exploring the relationship between gambling activities and Problem Gambling Severity Index (PGSI) scores

<https://www.gamblingcommission.gov.uk/report/exploring-the-relationship-between-gambling-activities-and-problem-gambling/pgsi-report-results>

⁹² Gambling-related harms attributable to lotteries products <https://www.sciencedirect.com/science/article/abs/pii/S030646032030602X>

⁹³ Relative risk of gambling products within Great Britain: Findings from a rapid literature review and secondary analysis project

<https://www.gambleaware.org/our-research/publication-library/articles/relative-risk-of-gambling-products-within-great-britain-findings-from-a-rapid-literature-review-and-secondary-analysis-project/>

⁹⁴ Treatment and support survey 2024. Data not publicly accessible beyond this report. Full report to be published in 2025.

⁹⁵ Is the economic model of gambling dependent on problem gambling? Evidence from an online survey of regular sports bettors in Britain

<https://www.tandfonline.com/doi/full/10.1080/14459795.2022.2088823#abstract>

⁹⁶ Annual Statistics from the National Support Network (Great Britain) 2023/2024

<https://www.gambleaware.org/our-research/publication-library/articles/annual-statistics-from-the-national-gambling-support-network-great-britain-20232024/>

⁹⁷ National Lottery firm Allwyn sees UK sales and earnings slide as new games hit by delays

<https://www.mirror.co.uk/news/business/national-lottery-firm-allwyn-sees-34283144>

⁹⁸ Treatment and support survey 2024. Data not publicly accessible beyond this report. Full report to be published in 2025. Quotes from in-depth interviews.

⁹⁹ Allwyn Partners With Snappy Shopper To Give Independent National Lottery Retailers The Ability To Sell Scratchcards Online

<https://www.allwyn.co.uk/insights/allwyn-partners-with-snappy-shopper-to-give-independent-national-lottery-retailers-the-ability-to-sell-scratchcards-online>

¹⁰⁰ The scratch card gambler: a hidden reality <https://link.springer.com/article/10.1007/s10899-022-10136-4>

with individuals able to buy them in local shops and online¹⁰¹, alongside the option to purchase up to 10 scratchcards¹⁰² (a £50 transaction) at a time, more could be done to reduce harm.

Individuals in recovery are able to gamble online on the National Lottery draw as it is **not covered by the self-exclusion software GamStop**¹⁰³, making it the only product (excluding the black market) that individuals are not able to self-exclude themselves from. This could easily lead to a recurrence of gambling, and gambling harms.

“However, I remember all too well the only time I gave up gambling for a long period of time, it was 12 odd years ago. It started with the odd lottery ticket, harmless enough in itself but it soon led to scratch cards, not many but that’s not the point. What I didn’t realise back then is that I had opened the door to the vampire. Slowly but surely other forms of gambling followed and before I knew it I was back into it like never before”

- Anonymous poster on GamCare’s chatroom¹⁰⁴

Individuals are able to click that they are gambling on behalf of a “syndicate” when gambling online which **allows their financial limits to increase** and thus increases the potential for harm¹⁰⁵.

Lastly, as a result of the new ‘Incentive Mechanism’¹⁰⁶ all National Lottery products will make Returns to Good Causes at the same level as the draw. Depending on how this is implemented by Allwyn it could lead to **fewer prizes, and therefore increased losses**, on scratch cards and instant-win games.

- **Stigmatising and misleading messaging**

The National Lottery website includes **narratives that could stigmatise those experiencing gambling harms**¹⁰⁷. This prevents people from accessing support earlier, leading to an increase of harms for the individual gambling and those around them¹⁰⁸. These narratives imply the individual is responsible for the harms they experience. Below provides some examples:

¹⁰¹ Homelessness & gambling harm toolkit <https://www.simonscotland.org/wp-content/uploads/2024/03/Gambling-Harms-Homelessness-Toolkit.pdf>

¹⁰² Scratchcards <https://www.national-lottery.co.uk/games/gamesstore/scratchcards#Why-are-you-imposing-the-limit>

¹⁰³ Will I still be able to play the National Lottery? <https://info.gamstop.co.uk/hc/en-gb/articles/4404979707410-Will-I-still-be-able-to-play-the-National-Lottery>

¹⁰⁴ Overcoming problem gambling – The Lottery <https://community.gamcare.org.uk/forum/overcoming-problem-gambling/the-lottery/>

¹⁰⁵ Service Guide https://www.national-lottery.co.uk/service-guide/int_syndicate_managers_1

¹⁰⁶ Fourth National Lottery Licence begins with Allwyn as new operator

<https://www.gamblingcommission.gov.uk/news/article/fourth-national-lottery-licence-begins-with-allwyn-as-new-operator>

¹⁰⁷ 12 ways to reduce stigma when discussing gambling harms – a language guide

<https://www.gambleaware.org/tools-and-support/resources-for-professionals/articles/12-ways-to-reduce-stigma-when-discussing-gambling-harms-a-language-guide/>

¹⁰⁸ Building Knowledge of Stigma Related to Gambling and Gambling Harms in Great Britain: A scoping review of the literature <https://www.gambleaware.org/sites/default/files/2022-07/GambleAware%20Stigma%20Final.pdf>

“Healthy play”

This position suggests there is a “healthy” amount of gambling, or a level of gambling which has benefits to health. There are no evidence-led guidelines for “healthy” gambling; the nearest equivalent is the Lower Risk Gambling Guidelines which aim to reduce the risk of experiencing harm and clearly state that lower risk does not equate to no risk¹⁰⁹. Concepts like this suggest that those experiencing harms from National Lottery products are “unhealthy” and personally to blame.

“Gaming is fun but for a few, it may be a problem”

This statement is misleading by not being transparent that the National Lottery is gambling rather than gaming. This wording suggests the activity is inherently fun and harmless. It also minimises the millions of people who experience harm through their gambling, or someone else’s, to a “few”. This further presents individuals that do experience harms as abnormal, suggesting there are problematic individuals rather than problematic products.

9. Concluding note

The National Lottery has a critical role in preventing and reducing gambling harm over the next decade due to the widespread reach of its advertising and products. The National Lottery has evolved beyond the draw, with new marketing strategies (e.g. encouraging the gifting of scratch cards), increased accessibility (e.g. online app) and diversified products more likely to be associated with harm (e.g. online instant-win games).

Allwyn’s ambition is to be the “safest place to play”. Signposting to gambling support services, such as GambleAware, on its advertising and products is one way in which the operator can achieve this, alongside wider safer gambling measures.

¹⁰⁹ Developing Lower-Risk Gambling Guidelines
<https://gamblingguidelines.ca/app/uploads/2023/06/LRGG-Developing-Lower-Risk-Gambling-Guidelines-Report-2021-en.pdf>