Lotto New Zealand

Award submission for Best Overall Responsible Gaming Programme

World Lottery Summit 2016
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Introduction

Lotto New Zealand

Lotto New Zealand was established in 1987 and exists to promote, organise and conduct lottery games for the purpose of generating profits for the benefit of New Zealand communities. In all of our activities, we aim to maximise profits for the benefit of New Zealand communities and to minimise the harm from problem and underage gambling associated with our products.

All profits from Lotto NZ are transferred to the New Zealand Lottery Grants Board, which works to build strong, sustainable communities by funding a wide range of social, community, arts, heritage, sports, recreation and health research activities across New Zealand. The essential funding we generate helps build strong New Zealand communities.

Our goal is to generate, on average, $200 million per year for onward distribution to New Zealand communities. Growing sales in a socially responsible way is fundamental to our success as a business. This is reflected in our overarching strategy of increasing penetration by getting more people to play our games a reasonable amount.
Product portfolio

Lotto NZ offers a number of draw-based lottery games and instant-win scratch tickets. A brief overview of each of these products follows:

**Lotto**
A 6/40 game, with a 1/40 bonus ball. The maximum prize is $1 million for matching all six numbers, with a minimum prize of approx. $24 for matching three numbers and the bonus ball.

**Lotto Strike**
An add-on game that can only be played if the customer is already playing Lotto. The aim of Strike is to pick the first four Lotto numbers in the correct order - the more numbers a player has in the right order, the more they win. The Strike jackpot starts at $100,000 and grows to a maximum of $800,000 at which time a Must Be Won draw is held.

**Lotto Powerball**
An add-on game to Lotto. It is a 1/10 game, with a top jackpot starting at $4 million and growing to a maximum of $40 million at which time a Must Be Won draw is held.

**Keno**
A fixed-wagering, 20/80 game. The maximum that can be won with Keno is $1 million. Keno is drawn four times daily at 10am, 1pm, 3pm and 6pm via a random number generator.

**Bullseye**
A simple six-digit numbers game. The closer a player’s number is to the winning number, the more they could win. The top prize starts at $100,000 and grows to a maximum of $400,000, when a Must Be Won draw is held.

**Play 3**
A simple three-digit numbers game. Players win by matching their three-digit number (in the exact order, any order or pairs) to the winning number. It is a fixed-odds game with a maximum prize pay-out of $500.

None of our draw-based lottery games are age restricted. All can be played in-store or online.

**Instant Kiwi**
Instant-win scratch tickets ranging in price from $1 to $15, with top prizes on offer ranging from $10,000 to $250,000. Instant Kiwi is Lotto New Zealand’s only age-restricted product and is only available for sale through our retail network.

**Age restrictions**
Under New Zealand law, instant-win scratch tickets are the only age-restricted lottery product. This age restriction was passed into law by the New Zealand Government in 1991, two years after the game was first introduced and is a reflection of the view that, unlike lottery games, instant tickets are potentially appealing to people aged under 18. Other forms of gambling such as sports betting, horse racing, casinos and electronic gaming machines are also age restricted under New Zealand law.

Lotto NZ’s responsible gaming (“RG”) programme reflects a combination of government regulation, operator self-regulation and individual responsibility. As a Crown entity, we must support the Government of the day and respect the rule of law. It is not Lotto NZ’s role to set social policy and we cannot initiate an age restriction for our games of our own accord.

**Operational environment**

**Corporate governance and leadership**
The activities of Lotto NZ are overseen by a Board of Directors, which is responsible for the overall governance, policy and direction of the organisation.

As a Crown entity, Lotto NZ is open to scrutiny by the Government. We are required to regularly report to the Government on our activities and operating performance. We submit our budget, business plan, specific performance measures, financial targets, annual reports, and audited accounts to the Government for approval. Our statement of intent, statement of performance expectations and annual report are published and tabled in Parliament.

Day-to-day running of Lotto New Zealand is the responsibility of the Chief Executive and the other members of the Executive team.
Lotto NZ – Responsible Gaming Programme

Our responsible gaming framework

Through our ticket-checking App, players can enter a 2nd Chance draw. However, it is not currently possible to buy a ticket through the App.

Our commitment to responsible gaming
We are committed to growing our business in a socially responsible manner for the maximum benefit of New Zealand communities, while minimising the potential for harm associated with our products. We cannot achieve our objective of maximising benefits for New Zealand communities if playing our products is causing undue harm.

Operating in a RG environment is one of the foundations of our business and is central to our day-to-day operations. Our RG policies and programmes are critical to the ongoing success of our business.
Programme element 1: Research

Background

Research strategic focus
Lotto NZ supports problem gambling related research to inform the development of our products, programmes and strategy. Lotto NZ’s systematic research programme ensures that all strategic business initiatives and our day-to-day operations are supported by extensive research on both commercial and RG implications.

Objectives

• Better understand the impact Lotto NZ has on our stakeholders
• Use international best practice to improve our overall programme
• Facilitate and support established problem gambling research programmes in order to contribute to society’s understanding of problem gambling
• Evaluate the effectiveness of, and identify opportunities to continually improve, our RG programmes.

Policy and programme

Facilitating research
Through the Problem Gambling Levy (“PGL”), Lotto NZ funds intervention services and the Government’s research programme to prevent and minimise gambling harm.1 Lotto NZ tracks data from intervention services and this forms part of the post-implementation analysis of the impact of new games or game changes.2

Funding research
Lotto NZ directly funds problem gambling research through the ‘International Think Tank on Gambling Research, Policy and Practice’ hosted by the Auckland University of Technology. Through this forum, international and local researchers, policymakers, service providers and industry members collaborate to advance understanding on globally significant issues and develop gambling policy, services and research.

Lotto NZ-driven research
We regularly undertake our own research to inform our RG practice, guide our strategic direction and provide input into our day-to-day operations. Recent examples include:

• a literature review to determine any impact on problem and underage gambling prior to launching our online channel, and subscriptions online
• an international market review of twice-weekly large jackpotting games
• review of international trends in the sale of lottery products at supermarket check-outs
• international review of mystery shopping programmes
• international examples of processes for identifying high spending levels amongst retailers
• examining international RG programmes to identify opportunities.

Examples of RG considerations as a result of these research projects, include:

• introducing mandatory spending limits, maximum account balance and single customer account for online channel, and regular communication with subscription players
• lower-priced ticket options, when introducing a second weekly large-jackpotting draw
• strict ID policy for age-restricted games
• introducing penalties for retailers failing mystery shopping (to check whether they are asking for ID)
• introduced process to monitor and intervene with retailers with high spend levels.

Collaborating with research providers
We collaborate with independent researchers to enable better understanding of the realities of lottery operations, provided our customers’ privacy is not compromised.

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Consuming research produced by others
Lotto NZ representatives regularly attend and participate in RG conferences to ensure that we have access to, and are learning from, the latest available research.

Lotto NZ is included in an annual corporate reputation index, which measures New Zealand companies based on leadership/success, fairness, responsibility and trust. The pillar of ‘trust’ covers whether New Zealanders consider Lotto NZ can be trusted, has a positive influence on society and is honest and ethical in the way it conducts business. Establishing responsibility and trust are significant drivers of Lotto NZ’s RG programme and is an important indicator of the effectiveness of our RG programme.

Research into our own RG programme
To evaluate the effectiveness of our overall RG programme, we research the awareness, knowledge and attitudes towards RG amongst our employees, customers and retailers. We also specifically monitor and evaluate the success of each RG programme element, more information in further sections.

Evaluation and monitoring
We track:

• brand health trend data
• reputation measure trend data, including ‘trust’ and ‘responsibility’
• relevant outputs from research - can we demonstrate that research is identifying best practice and helping to shape significant business decisions and our RG practices?
Programme element 2: Employee training

Background
Safe gaming is at the heart of Lotto NZ’s business operations. It’s critical that all employees understand our commitment to RG, so we provide training and educational information to support this. Our mature employee training programme ensures responsible gaming is integrated into our day-to-day operations and that it is a priority for all of our staff from day one.

Objectives
• Ensure that all staff understand and value harm minimisation and RG
• Educate employees and provide them with tools needed to engage RG principles in their day-to-day work
• Keep principles of RG current and relevant to our staff
• Embed RG principles into the fabric of Lotto NZ through our values, strategy, culture, policies, training and supporting tools.

Policy and programme

Organisational values
Our organisational values reflect our focus on being socially responsible and form the expectations for our employees. They form part of each employee’s job description and are reinforced in strategy sessions, our annual conference, our performance framework and other tools and activities, such as a handy desk chart and monthly employee awards.

Strategic business goals
One of Lotto NZ’s main business foundations is to be a world leader in RG practices. We have a clear corporate strategy that aims to responsibly grow our business for the maximum benefit of New Zealand communities, while maintaining a strong focus on minimising the harm associated with our games.3

Weekly staff update sessions and an annual seminar keep staff informed of progress on our business strategy and supporting initiatives, including continuous improvement of our RG programme.

Every year, all employees are required to complete a performance plan to set objectives and link them to our strategic goals – including RG. Each employee’s performance, and subsequent remuneration review, is measured against achievement of their objectives.

Employee training
All new staff members attend an induction into our business, which includes a detailed overview of our RG programme and information on how our business strategy and day-to-day operations are guided by RG principles.

In order to understand how our retail network operates, all new staff members also attend a retailer training session. In doing so, all staff take part in the underage gambling and problem gambling training provided to retailers.

Specialised training
Our Territory Representatives are the face and voice of Lotto NZ for retailers, so we are developing an additional retail-focused problem gambling e-training module for these retail and customer-facing employees.

Our Marketing team has additional training and information sessions focused on Lotto NZ’s RG advertising guidelines and New Zealand’s advertising standards

Responsible Gaming Champions
We have established RG Champions in key business units, who are instrumental in delivering continuous improvement to our RG programme by identifying gaps and opportunities and ensuring their teams are well-informed.

Employee tools
Other employee tools to support our RG programme include:
• a ‘problem gambling toolkit’ for retail-facing staff
• use of the intranet to promote RG to staff including tools, resources, news and reminders
• a handy quick guide to our RG programme, which opens to a poster, as a reference tool and visual reminder for all staff.

Evaluation and monitoring

Our employee training programme continues to evolve, in line with enhancements to our overall RG programme, research and industry best practice. We monitor and evaluate by tracking:

• post-training test results
• feedback from staff following training
• employee’s knowledge of RG and using this to identify training needs.
Programme element 3: Retailer programme

Background

Our retailers are the face of Lotto NZ to the public and our players. They are a crucial channel for encouraging RG, preventing underage play and passing treatment referral information to our customers.

Objectives

- Inform and educate retailers
- Equip retailers with tools and support needed to interact with potential problem gamblers
- Protect our players and retailers
- Prevent underage play.

Policy and programme

Retailer training

We worked closely with problem gambling specialists to develop bespoke training and tools relevant for our retail network. All retailers attend training that includes an RG module covering:

- prevention of underage play
- problem gambling warning signs
- marketing safeguards
- RG tools and support.

Retailer Operations Manual (ROM)

The ROM forms part of each retailer’s agreement with Lotto NZ and outlines their rights and obligations, important procedures, game rules, and an overview of our RG programme.

Retailer tools and support

RG information in all stores includes How to Play Responsibly brochures, problem gambling envelopes, and information about Instant Kiwi’s age restriction and ID policy. R18 insignia is also displayed on all instant-win tickets, point of sale and marketing materials.

The problem gambling envelope was created through collaboration with problem gambling specialists as a discreet way for retailers to give information to a customer while minimising potential conflict or embarrassment.4

Date of birth prompt

To help retailers prevent underage play, an onscreen prompt reminds them to check for ID when selling instant-win tickets, by providing a reference date the customer must be born before to be over 18.

Awareness and reinforcement

We regularly inform, educate and keep our retailers engaged with our RG programme through monthly 'Newsflash' newsletters, weekly TR newsletters and sales support.

Retailer risk minimisation

Our At Risk Retailer programme is intended to minimise the opportunity for retailer fraud. This includes a ‘staff purchase’ button that must be used when a retailer buys a ticket. Lotto NZ monitors retailer spending data, identifies stores spending above the network average and intervenes with potentially vulnerable retailers.

Mystery shopping

Regular mystery shopping tests retailers’ adherence to RG policy. We researched the mystery shopping programmes of international lotteries and subsequently updated our process to provide clear implications for retailers failing to check ID.

Retailer engagement survey

Through our retailer engagement survey we measure the effectiveness of our RG programme including training, tools and support. Responses identified a level of retailer concern over parents buying instant-win tickets for their children, following which Lotto NZ participated in the Holiday Campaign.5

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4 A copy of the Problem Gambling Envelope is available in Appendix 1.
5 The overall Lottery Holiday Campaign is coordinated by the USA’s National Council on Problem Gambling.
Programme element 3: Retailer programme

In-store reminder campaigns
Through a Lottery Holiday Campaign, Lotto NZ reminded retailers that instant-win tickets aren’t suitable Christmas gifts for children.

Lotto NZ supported Gambling Harm Awareness Week by reminding customers they should be playing Lotto for fun. Digital signage in retail, email communications and a link on MyLotto directed customers to a quiz to test their gambling.

Evaluation and monitoring
We evaluate our programme by tracking:

- post-training test results
- number of retailers convicted of selling to underage customers
- average ‘At Risk Retailer’ scores
- percentage of the network identified as potentially spending excessively or identified as ‘high risk’
- mystery shopping results
- retailer engagement survey results.

New initiatives:
As a result of these measures, we introduced the following new initiatives.

- Updated our mystery shopping programme to include implications for non-compliance
- Established a process to intervene with stores with high spend levels
- Commissioned international research into best practice for monitoring retailer play behaviour.
Programme element 4:
Game design

Background

Lotto NZ offers adult New Zealanders fun and entertaining games to play and win, while contributing money back to the community. Lotto NZ is statutorily required to ensure that the risks of problem and underage gaming associated with our games are minimised.

Growing in a socially responsible way is fundamental to our success as a business, which is reflected in our overarching strategy of increasing penetration by getting more adult New Zealander to play a reasonable amount.

Objectives

- Design and provide an entertaining and safe gaming experience
- Design games that primarily appeal to adults
- Ensure minors and vulnerable groups are not targeted.

Policy and programme

Game design principles and process

Our game design process is subject to regulatory oversight, strict internal design principles, rigorous internal review and approval, and the use of external risk assessment tools intended to:

- identify games that are suitable for the New Zealand market
- gather and learn from international experience
- identify any areas of risk for our players
- mitigate risks associated with potential future products.

Lotto NZ assesses each potential game using an external game evaluation tool to identify how risky a game may be for a vulnerable player and to pinpoint any problematic elements of the game so that they can be amended.6

New product development

When developing any new product, Lotto NZ uses international research and evidence to provide useful information about game characteristics including game odds, jackpots, draw frequency, pricing and distribution channels.

A thorough internal review process ensures:

- adherence to Lotto NZ’s RG guidelines and principles
- international market review
- external risk assessment to identify any game features that need to be addressed to minimise risk
- formal approval of a business case by Lotto NZ’s Board.

Following which, an external approval process ensures:

- formal consultation with government stakeholders to provide assurance that harm minimisation is a key game design consideration
- government approval
- development of the Game Rules to become New Zealand law.

Each instant-win game design is then subject to the following additional internal and external processes.

- External risk assessment
- Harm Minimisation Committee review to ensure the ticket design adheres to RG principles
- Review and approval of game specifications by Government regulators
- Game specifications published online.

Harm Minimisation Committee (HMC)

Our internal HMC is an additional channel to ensure adherence to RG principles. The committee must be satisfied that all RG criteria have been met before providing approval to proceed for each instant-win game design.

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6 Currently Lotto NZ uses GAM-GaRD (Gambling Assessment Measure – Guidance about Responsible Design) to identify how risky a game is likely to be for a vulnerable player. GAM-GaRD has been designed to aid the development of socially responsible games and utilises up-to-date research findings from around the world to facilitate well-informed, objective, and responsible game reviews.
Recording and monitoring
In the interests of continuous improvement, we monitor and learn from game reviews through maintaining:

1. a record of GAM-GaRD scores for all games
2. a record of feedback from HMC
3. a checklist of assessment criteria as a reference for HMC.

Stakeholder activity
We have formalised agreements with key delivery partners to ensure that they understand our commitment to RG and will support us to minimise harm.

We shared our game design process with problem gambling stakeholders to seek feedback to assist us in improving our process.

Evaluation and monitoring
We evaluate the effectiveness of our game design processes by tracking:

- GAM-GaRD trend data
- post-implementation game review\(^7\)
- number of complaints upheld about instant-win tickets.

Game design process flowchart

\(^7\) Examples of post-implementation reviews are available in Appendix 2.
Programme element 5: Remote gaming

Background
Lotto NZ offers remote gaming through a desktop and mobile site MyLotto.co.nz, and we have recently launched a ‘text to play’ service via mobile phones. Currently, the only Lotto NZ products not available for sale through MyLotto are instant-win tickets. We also have a ticket-checking App, through which players can enter a 2nd Chance draw - it is not possible to buy a ticket through the App.

Our remote gaming programme ensures we are providing a safe online playing environment by setting safeguards, monitoring activity and providing information and support to customers.7

Objectives
- Minimise the potential for problem gambling
- Prevent underage gambling
- Provide information, tools and resources to customers to encourage RG
- Provide information, support and treatment referral for potential problemiders and the public
- Ensure that RG remains an important consideration when developing online initiatives.

Detailed policy and programme

Online safeguards
MyLotto has a number of safeguards in place, including:7
- mandatory spending limits
- individual spending limits for self-regulation
- player self-exclusion from games and communications
- limiting access through opening/closing hours.

Education and information
We aim to educate and inform our online players through:
- mandatory acceptance of site terms and conditions to agree to mandatory spending limits and to create awareness of our commitment to responsible gaming
- a dedicated section for RG information with access to available tools and support
- game odds information to encourage informed play
- treatment referral information
- access to a self-test to evaluate play behaviour
- ensuring only players who opt-in receive jackpot reminders and results communications
- monitoring play behaviour and communicating with players when they are hitting their limits to provide information and support
- age-restriction information on all touch points to remind customers that instant-win tickets are an age-restricted product.

Account management
- Customers limited to one account
- Maximum account balance to minimise the risk of excessive spending
- Subscription players are able to regularly review and assess their spend, and can stop their subscription at any time
- Player account history with detailed play and spend information
- Deposit limit to minimise the risk of excessive spending
- No credit, incentives or rewards for play.

Text service
Through Lotto NZ’s new ‘text to play’ service players can purchase a ticket from their phone by texting ‘YES’.8 RG safeguards include:
- text service players must be registered to MyLotto
- players need to opt-in to receive text messages and can opt out at any time
- players can choose whether or not to buy a ticket
- all online safeguards, education and information, and account management safeguards outlined earlier apply to the text service.

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7 An overview of Lotto NZ’s RG safeguards, tools and information provided, see: https://mylotto.co.nz/our-commitment-to-responsible-gaming/
8 For information about Lotto NZ’s text service, see: https://mylotto.co.nz/lotto/text-service/
Programme element 5: Remote gaming

Ticket-checker App

Players can check tickets and enter non-winning tickets through the App. Currently players are unable to buy tickets through the App. RG safeguards through the App include:

- mandatory limit on the number of tickets that can be entered into 2nd Chance
- monitoring play behaviour and communicating with players when they are hitting the ticket-entry limits to provide information and support
- age restriction and age verification to ensure 2nd Chance players are aged 18 and over
- regular age restriction reminders on all 2nd Chance collateral
- customers limited to one account
- access to RG information, tools and resources.

Evaluation and monitoring

We monitor and evaluate the effectiveness of our remote gaming channels programme by tracking trend data including:

- MyLotto customers reaching spending limits
- 2nd Chance players reaching ticket-entry limits
- customer self-exclusions
- change in play behaviour of customers contacted regarding their spending and play behaviour
- change in play behaviour of players who self-exclude from games.

We use the learnings from this evaluation and measurement to identify opportunities to improve the effectiveness of our RG programme.

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Footnote 9: For more information about Lotto NZ’s ticket-checker App, see: https://mylotto.co.nz/mylotto-features-and-services/mobile/
Programme element 6: 
Advertising and marketing communications

Background
Lotto NZ applies RG principles when creating advertising and marketing campaigns and buying media.

We aim to ensure the socially responsible promotion of our products to minimise risk for players. Our marketing is intended to promote our lottery games as fun, entertaining and recreational.

Objectives
• Adherence to the New Zealand Advertising Standard Authority’s (ASA) Code for Advertising Gaming and Gambling
• Adherence to Lotto NZ’s self-regulation of socially responsible guidelines
• Prevent underage and excessive gambling.

Policy and programme

Regulatory environment
All advertising in New Zealand is required to comply with the ASA’s Codes of Practice, which set and enforce the standards that govern socially responsible advertising. Lotto NZ complies with these codes for all of its advertising, and these codes also provide guidance for new game development.10

Lotto NZ’s RG code
Lotto NZ has developed its own RG advertising, marketing and communications guidelines. These have been shaped by the programmes of other lotteries, as well as the best practice marketing and communications guidelines from the World Lottery Association.

Our marketing is intended to promote our games as fun, entertaining and recreational. Our RG principles ensure we uphold responsible trading practices and community standards. They include not:
• targeting, or primarily appealing to, minors
• promoting reliance to relieve financial difficulty
• encouraging excessive participation
• implying a promise of winning
• exaggerating the chances of winning or the size of the prize
• implying skill can influence the outcome.

The R18 age-restricted logo is present on all relevant consumer-facing materials and communications including tickets, advertising and point-of-sale. We regularly liaise with problem gambling treatment providers to seek review and feedback on our guidelines.

Harm Minimisation Committee review process
Lotto NZ’s HMC provides an additional channel of review to ensure we adhere to RG principles. The committee reviews all marketing collateral, suggested marketing and advertising content, and promotional activity/activations.

Media placement
Lotto NZ uses a range of media including television, print, radio, posters, billboards and point-of-sale. We work closely with our media partners to ensure that our advertising and media placement is aimed at adult New Zealanders by:
• purchasing all television media against demographic information targeting people aged 25-54
• avoiding sites that are close to schools
• not advertising in food halls of shopping malls.

Encouraging responsible play
We use point-of-sale, in-store and online material to remind our customers to play our games responsibly. Lotto NZ’s Have Fun and Play Responsibly visual identity is a regular reminder to players and is located on key pieces of communication in relation to our games.

10 Copies of the ASA’s Advertising Code of Ethics, Code for Advertising Gaming and Gambling, and Code for Advertising to Children are available in Appendix 3.
Programme element 6: Advertising and marketing communications

Working with our stakeholders

Lotto NZ uses third-party providers to help in the process of designing, delivering, promoting and supporting our games. Our creative and media placement agencies are briefed on the relevant advertising codes and game rules and we have formalised RG agreements with our main third-party suppliers to ensure that they:

- are aware of and understand our commitment to RG
- understand the key principles and assessment criteria we apply to our games
- understand the role they play in helping us to minimise harm.

Evaluation and monitoring

We evaluate this programme by:

- tracking any complaints to the ASA
- measuring players’ affinity for our brand
- researching our customers’ awareness, knowledge and attitudes towards RG.
Programme element 7: Player education

Background

We are committed to protecting the interests of our players by providing ready access to information, tools and support, so they can make informed decisions about playing our games.

Objectives

- Provide accurate information to enable customers to make informed decisions
- Promote responsible play
- Prevent underage play
- Provide tools and support
- Support national educational activity.

Policies and programme

Supporting the national education agenda

In New Zealand, the Government centrally manages a national gambling educational campaign, Choice Not Chance, which Lotto NZ supports by promoting it through our channels.

In-store information

- Our How to Play Responsibly brochure is available in all stores and has been translated into English, Mandarin and Korean. It includes the odds of winning, warning signs and treatment referral information.
- Our Problem Gambling Envelope is a tool for retailers to discreetly provide information to customers who they’re concerned about. It includes warning signs, treatment referral information and testimonials of people who have sought help for problem gambling.

Online information

- Mandatory acceptance of site terms and conditions including spending limits
- A section dedicated to providing information about responsible play, RG safeguards and tools including:
  - individual spending limits
  - self-exclusions from online games
  - game odds
  - problem gambling warning signs
  - treatment referral information
  - Lotto NZ’s Player Care Charter, outlining Lotto NZ’s commitment to responsible service delivery
  - a player self-test to learn more about their own gambling behaviour
  - tips for staying in control of play behaviour.

Constant customer reminders

All of our products display the Have Fun and Play Responsibly visual identity as a reminder of responsible play. It is located on lottery coupons and tickets, our online footer and all electronic communications with customers.

Tools to support responsible play

Self-regulation tools include in-store self-exclusion from games, online self-exclusion from games and email communications, and the ability to set personal online spending limits.

Preventing underage play

Instant-win tickets are an age-restricted product and are only available in-store. To prevent underage play, we provide the following information in-store.

- Our age-restriction policy
- Posters outlining our ID policy
- R18 reminders on all promotional material.

Treatment referral

Information for customers who may want to seek help for potential problem gambling is readily available. We communicate treatment referral contact information in-store and online.

Monitoring online and in-store spending

Lotto NZ monitors high spending in-store and online. We contact customers who regularly reach their online spending limits or who make high-value purchases in-store to provide information, support and tools to help them assess their play behaviour.

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12 The Choice Not Chance campaign is funded by the Problem Gambling Levy. Lotto NZ contributes approximately $1.2 million to the levy annually. More information can be found at www.choicenotchance.org.nz

13 In-store information For a copy of Lotto NZ’s Have Fun, Play Responsibly brochure, see https://mylotto.co.nz/our-commitment-to-responsible-gaming/

14 Online information For MyLotto’s terms and conditions, see: https://mylotto.co.nz/legal-and-privacy-policies/mylotto-terms-and-conditions/

15 Online information For MyLotto’s RG section, see: https://mylotto.co.nz/our-commitment-to-responsible-gaming/
Additional initiatives

- Responsible play messaging during high jackpots\textsuperscript{16}
- Engaging with vulnerable groups to understand and support their needs
- Campaign to remind players that lottery products are not appropriate gifts for children
- Campaign to support Gambling Harm Awareness Week
- A winners’ care programme, including a winners’ book of advice.\textsuperscript{17}

Evaluation and monitoring

Our evaluation and monitoring programme includes:

- trend analysis for high spender data
- evaluation of the effectiveness of high spender communications and self-exclusion programme
- research to help better understand stakeholders and shape our RG programme including:
  - tracking customer awareness, perception and knowledge of responsible gaming
  - measuring effectiveness of retailer training and tools
  - evaluation of RG tools, messaging and materials with TRs, industry stakeholders, retailers and customers.

\textsuperscript{16} For an example of RG messaging in press releases, see: https://mylotto.co.nz/news-and-press-releases/more-people-playing-for-40-million-prize/

\textsuperscript{17} Prepared in consultation with the Commission for Financial Capability and the Financial Markets Authority. An electronic copy of the winners’ book is available from https://mylotto.co.nz/the-winning-experience
Programme element 8: 
Treatment referral

Background
Under New Zealand legislation, the Government is responsible for the treatment of problem gambling. Lotto NZ pays an annual Problem Gambling Levy (PGL) that helps fund problem gambling treatment services, including a free Gambling Helpline. Lotto NZ has taken steps to ensure that our players, and those who need help, are aware of the support services and resources available to them.

Objectives
- Ensure treatment information is readily available for our customers
- Provide funding for treatment service providers
- Provide tools and support to our retailers
- Provide information, tools and resources to encourage responsible gaming.

Detailed policy and programme

Funding problem gambling treatment
Through payment of the PGL, Lotto NZ funds the Government’s programme to prevent and minimise gambling harm, which includes problem gambling research and intervention services, including:
- helpline and web-based services
- psychosocial interventions and support
- data collection and reporting.

Support and referral
We ensure that our players have access to tools and information to learn more about their play behaviour, know when they need more support and know where to go for help. The Choice Not Chance campaign and website aims to strengthen society’s understanding of gambling-related harm. It provides support and information for people who are concerned about their own or someone else’s gambling behaviour.

We provide the contact details for the Gambling Helpline and links to the Choice Not Chance website in all of our RG collateral in-store and online, including:
- responsible gaming section of MyLotto – desktop, mobile and App
- How to Play Responsibly brochure in-store and online
- Problem Gambling Envelope for players in-store
- Player Care Charter online
- email communications to MyLotto and 2nd Chance players.

Working with treatment providers
Lotto NZ has close working relationships with problem gambling treatment providers and research agencies, whom we consult to seek feedback on our programme and materials.

In consultation with treatment providers, we established an in-store self-exclusion process to support customers who want to stop playing our games. We work with treatment providers to support these customers.

We support Gambling Harm Awareness Month by promoting Choice Not Chance resources through our website, electronic communications and in-store digital signage, asking customers whether they are still playing Lotto just for fun and encouraging them to take a self-test to assess their play behaviour.

Training
Treatment referral information is an important part of our RG training. All retailers and employees attend a training session that includes how to identify and provide support for potential problem gambling in-store. This includes providing at-risk players with a copy of our problem gambling envelope, which is an important treatment referral tool for players.

Any customers or retailers that contact Lotto NZ directly to seek help in regard to problem gambling are directed to the Social Responsibility team, who are able to provide treatment referral information and discuss ways in which Lotto NZ can support them (i.e. self-exclusion).

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18 In FY16, Lotto NZ paid a PGL of $1.288 million.
19 For treatment referral on MyLotto, see: https://mylotto.co.nz/our-commitment-to-responsible-gambling/
Evaluation and monitoring

We evaluate our treatment referral programme by tracking:

- problem gambling intervention trend data
- knowledge scores from retailers attending problem gambling training
- change in play behaviour of customers contacted regarding their spending and play behaviour
- change in play behaviour of players who self-exclude from games
- the results of independent evaluations of the Government’s problem gambling intervention service delivery model
- ‘click-throughs’ to the Choice Not Chance self-test from MyLotto.
Programme element 9: Stakeholder engagement

Background
Maintaining effective relationships with our stakeholders is integral to Lotto NZ’s goal of responsibly growing our business for the maximum benefit of New Zealand communities. Sharing information with, and seeking input from, a broad range of relevant stakeholders on our business initiatives will help us achieve our goal.

Objectives
- Listen and engage with stakeholders to ensure their views are heard and considered
- Understand stakeholder needs, priorities and the impact we have on them
- Provide open and transparent information to stakeholders that promotes our purpose and vision
- Provide assurance about, and seek input into, our world-class RG practices across all Lotto NZ’s activities.

Policy and programme

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Objectives include</th>
<th>Example outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Government agencies</td>
<td>• Sharing information/data</td>
<td>Feedback from Government agencies helped set online spending limits for MyLotto.</td>
</tr>
<tr>
<td></td>
<td>• Regulatory compliance</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Providing assurance that harm minimisation requirements are met</td>
<td></td>
</tr>
<tr>
<td>Gaming industry and experts</td>
<td>• Learning from best practice</td>
<td>Strengthened mystery shopping programme, introduced external risk review of all instant-win tickets, and developed online safeguards.</td>
</tr>
<tr>
<td></td>
<td>• Contributing to society’s understanding of problem gambling</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Improving our RG programme</td>
<td></td>
</tr>
<tr>
<td>Problem gambling specialists</td>
<td>• Understanding their needs</td>
<td>Consultation with treatment providers helped create training and a problem gambling envelope to support retailers and educate customers.</td>
</tr>
<tr>
<td></td>
<td>• Seeking input into our RG programme</td>
<td></td>
</tr>
<tr>
<td>Lotto NZ employees</td>
<td>• Educating and informing to ensure responsible business decision making</td>
<td>Creation of RG champions.</td>
</tr>
<tr>
<td>Retailers</td>
<td>• Providing effective RG tools</td>
<td>Introduction of staff spending button and process to monitor and engage retailers with high spend.</td>
</tr>
<tr>
<td></td>
<td>• Understanding needs and experiences</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Minimising retailer risk</td>
<td></td>
</tr>
<tr>
<td>Customers</td>
<td>• Educating and support</td>
<td>Creation of How To Play Responsibly brochure in different languages.</td>
</tr>
<tr>
<td></td>
<td>• Encouraging responsible play</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Understanding behaviour and needs</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Responding to concerns</td>
<td></td>
</tr>
<tr>
<td>Lottery funded groups and grant recipients</td>
<td>• Increasing awareness and visibility of community benefits</td>
<td>Creation of a regular video series to promote community stories.</td>
</tr>
<tr>
<td>Members of the NZ public</td>
<td>• Building trust in Lotto NZ</td>
<td>Following a complaint, we amended marketing programme to prohibit advertising in shopping mall food halls.</td>
</tr>
<tr>
<td>Key business partners</td>
<td>• Increasing awareness and support of Lotto NZ’s commitment to responsible gaming</td>
<td>Sought input from Scientific Games on their experience of launching 100s and 1000s ticket type in other markets.</td>
</tr>
</tbody>
</table>

Stakeholder engagement strategy

Our stakeholder engagement strategy follows this five-step approach:

1. **Engagement strategy:** Define how our business plan connects with and impacts our stakeholders
2. **Stakeholder mapping:** Plot and prioritise stakeholders by their influence, interest in, and support
3. **Preparation:** Develop clear objectives, issues and opportunities, and actions for each audience, outline engagement plans including who we engage with, how and why
4. **Engagement:** Include activity to better understand stakeholder needs/concerns and maximising business benefit from their knowledge, experience and perspective
5. **Action, monitor and report:** Define and prioritise material issues for all parties, communicate outcomes and actions, and identify next steps for engagement.

Evaluation and monitoring

Lotto NZ’s stakeholder relationships are essential in identifying and managing continuous improvement in other programme elements. The ongoing willingness of our stakeholders to engage with us and our reciprocal engagement is a positive indicator of the effectiveness of our stakeholder engagement programme.

As part of our stakeholder engagement planning we have outlined what success looks like for each stakeholder. Some of the measurements include:

- achievement of stakeholder engagement objectives
- government support for key projects
- reporting deadlines met
- meetings conducted as per engagement planning
- stakeholder research and feedback.

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21 Copies of Lotto NZ’s stakeholder map and materiality matrix are available in Appendix 4.
Programme element 10:
Measurement and reporting

Background
As required under the Crown Entities Act, the Government oversees and manages its interest in Lotto NZ.

We are committed to facilitating clear and transparent monitoring of our operations by providing Government agencies with good information on which to judge our business decisions and performance.

We publically report on our commitments, initiatives and performance in responsible gaming on a variety of communications platforms, including the Lotto NZ website and our annual reports.

Objectives
• Share reliable information about our RG programme with stakeholders
• Provide a clear road map for responsible growth
• Be accountable for our performance
• Facilitate clear and transparent monitoring of our operations.

Policy and programme
Lotto NZ routinely discloses information regarding its financial performance, operational highlights and RG progress on a variety of communication platforms, including our website and annual reports. The following table summarises our external and internal reporting initiatives.

<table>
<thead>
<tr>
<th>Document</th>
<th>Description</th>
<th>Audiences</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Report22</td>
<td>Contains information on our RG activity and key metrics to measure and evaluate it.</td>
<td>External</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Internal</td>
</tr>
<tr>
<td>Half-year report22</td>
<td>Financial reporting and a snapshot of progress during the first six months of the financial year, including social responsibility.</td>
<td>External</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Internal</td>
</tr>
<tr>
<td>Statement of Intent22</td>
<td>Sets out strategic objectives including responsible gaming, harm minimisation and KPIs to measure success.</td>
<td>External</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Internal</td>
</tr>
<tr>
<td>Statement of Performance Expectations22</td>
<td>Sets out main measures for evaluating our progress against business strategies, including harm minimisation.</td>
<td>External</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Internal</td>
</tr>
<tr>
<td>Quarterly reports to monitoring body</td>
<td>Quarterly update on progress against main strategic objectives, including progress on RG activity and tracking of harm minimisation metrics.</td>
<td>External</td>
</tr>
<tr>
<td>Briefing to Incoming Minister (every three years)</td>
<td>An overview of our business, financial performance, operating environment and strategic direction.</td>
<td>External</td>
</tr>
<tr>
<td>Player Care Charter23</td>
<td>A snapshot of Lotto NZ’s commitment to RG and activity across our RG programme.</td>
<td>External</td>
</tr>
<tr>
<td>Board reports</td>
<td>Monthly update on progress against strategic objectives, including RG activity and KPIs.</td>
<td>Internal</td>
</tr>
<tr>
<td>Responsible Gaming Governance Committee report</td>
<td>Quarterly updates on RG activity and monitoring of harm minimisation metrics.</td>
<td>Internal</td>
</tr>
</tbody>
</table>

22 Available at: https://mylotto.co.nz/about-us/reports-and-statements
23 A copy of the Player Care Charter is available at https://mylotto.co.nz/our-commitment-to-responsible-gaming
Evaluation and monitoring

Lotto NZ uses the outlined reports to monitor and evaluate each programme element of our overall RG programme.

**Annual Reports, Statements of Intent and Statements of Performance Expectations**

Externally audited for accuracy, compliance, and consistency. Provided to government stakeholders for feedback, and open to public scrutiny and stakeholder feedback.

**Board reports and Responsible Gaming Governance Committee reports**

Board members provide feedback on the content of Board reports, which includes reporting on RG activity and Responsible Gaming Governance Committee reports. These are regularly tailored to ensure that the information meets Board members’ needs.

**Stakeholder review**

Our measurement and reporting programme has been informed by the best practice reporting programmes of other Level 4 WLA-certified lotteries. We reviewed the reporting of international lotteries, following which we expanded the information in Lotto NZ’s annual reports to include RG activity and measures. As part of our programme of stakeholder engagement, we asked problem gambling stakeholders what other reporting might be useful and at our six-monthly meetings we review whether Lotto NZ’s existing reporting meets their needs.

**Third-party review**

As part of the process to prepare our Level 4 WLA Responsible Gaming certification, we commissioned an independent auditor to review each element of our RG programme, including metrics to track and evaluate effectiveness.

**Responsible gaming scorecard**

Lotto NZ has developed a number of metrics to monitor, track progress and evaluate effectiveness of RG programme elements. This is a useful tool to provide further context of our activity to stakeholders.\(^4\)

\(^4\) A copy of our Responsible Gaming Scorecard is available in Appendix 5.
## Appendices

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<td></td>
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<td>Appendix 5</td>
<td>Responsible Gaming Scorecard (REMOVED)</td>
<td></td>
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<td>Appendix 6</td>
<td>Glossary of terms</td>
<td>36</td>
</tr>
</tbody>
</table>
Appendix 1:

Problem Gambling Envelope

Dear customers,

Lotto NZ and our retailers are committed to providing a safe, secure and friendly playing environment. We want you to enjoy playing our games and we want to be a responsible provider of lottery products.

Some signs that your or someone else’s gambling may be becoming a problem:

• you’re concerned about how much you are spending
• buying more tickets than you used to
• trying to win back money that you’ve spent
• choosing to buy tickets instead of other goods
• getting angry or agitated when buying lottery tickets

If any of these sound familiar or you are concerned about your own or someone else’s gambling: Call the free Gambling Helpline 0800 654 655 OR text 8009

Or for more tips, tools or advice visit: www.choicenotchance.org.nz
I used to dream about winning Lotto. I'd buy tickets every week and live on the fantasy of what my life would be like if I won.

Only trouble was, each week I was driving around different dairies and supermarkets buying more and more tickets. I was hiding it from my family and feeling guilty about how much I was spending. It was hard, but I phoned the Gambling Helpline and then had a good talk to my wife. She was upset and the kids have been affected too, but it’s not a secret anymore and I’m proud of taking control.

I’ve come to realise that I can’t live in a fantasy world when I have a family that needs me in the here and now. Getting help for my gambling helped me turn this problem around.

Call the Gambling Helpline on 0800 654 655 or text 8006
www.choicenotchance.org.nz

Dear customers,

Lotto NZ and our retailers are committed to providing a safe, secure and friendly playing environment. We want you to enjoy playing our games and we want to be a responsible provider of lottery products. Some signs that your or someone else’s gambling may be becoming a problem:

• you’re concerned about how much you are spending
• buying more tickets than you used to
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If any of these sound familiar or you are concerned about your own or someone else’s gambling: Call the free Gambling Helpline 0800 654 655 OR text 8009
Or for more tips, tools or advice visit: www.choicenotchance.org.nz
Appendix 2:

Game design post-implementation review examples

Post-implementation game review - Play 3
In October 2014, Lotto NZ introduced a new simple numbers game called Play 3. The process to introduce Play 3 included:

- international market review of simple numbers games external risk assessment via GAM-GaRD
- internal approval to proceed by Lotto NZ’s Board based on the business case
- formal consultation with government stakeholders, including a robust analysis of harm minimisation considerations
- approval from the Minister of Internal Affairs
- game rules being passed into legislation.

Since it was introduced, there have been no problem gambling interventions recorded in relation to Play 3 and the average number of monthly online self-exclusions is less than that experienced with other daily games. We will continue to monitor these trends.

Post-implementation game review - Keno
In October 2014, Lotto NZ introduced two additional daily Keno draws, so there are now four. Before introducing the extra Keno draws, a thorough review of the risk profile of the game changes was undertaken including:

- an external risk rating via GAM-GaRD, where the risk rating was still ‘low’
- a review of the impact on play behaviour when previous changes to Keno frequency occurred in 2002 (from five draws a week to seven) and in 2004 (from one daily draw to two)
- a review of the international context with regards to Keno
- a marketing campaign aimed at welcoming new players and broadening the appeal of the game, in support of Lotto NZ’s business strategy to get more people paying a small amount of money to play its games.

Following the introduction of the two additional draws, there has not been an increase in problem gambling interventions recorded in relation to Keno and there has not been an increase in the monthly average number of self-exclusions. We will continue to monitor these trends.
Appendix 3:
Advertising codes

ADVERTISING STANDARDS AUTHORITY’S ADVERTISING CODE OF ETHICS

BASIC PRINCIPLES
1. All advertisements must comply with the laws of New Zealand.
2. No advertisement should impair public confidence in advertising.
3. No advertisement should be misleading or deceptive or likely to mislead or deceive the consumer.
4. All advertisements should be prepared with a due sense of social responsibility to consumers and to society.
5. All advertisements should respect the principles of free and fair competition generally accepted in business.

RULES
1. Identification - Advertisements should be clearly distinguishable as such, whatever their form and whatever the medium used; when an advertisement appears in a medium which contains news or editorial matter, it must be presented so that it is readily recognised as an advertisement.
2. Truthful Presentation - Advertisements should not contain any statement or visual presentation or create an overall impression which directly or by implication, omission, ambiguity or exaggerated claim is misleading or deceptive, is likely to deceive or mislead the consumer, makes false and misleading representation, abuses the trust of the consumer or exploits his/her lack of experience or knowledge. (Obvious hyperbole, identifiable as such, is not considered to be misleading).
3. Research, Tests and Surveys - Advertisements should not use tests and surveys, research results or quotations from technical and scientific literature, in a manner which is misleading or deceptive.
4. Decency - Advertisements should not contain anything which clearly offends against generally prevailing community standards taking into account the context, medium, audience and product (including services).
5. Offensiveness - Advertisements should not contain anything which in the light of generally prevailing community standards is likely to cause serious or widespread offence taking into account the context, medium, audience and product (including services).
6. Fear - Advertisements should not exploit the superstitious, nor without justifiable reason, play on fear.
7. Violence - Advertisements should not contain anything which lends support to unacceptable violent behaviour.
8. Denigration - Advertisements should not denigrate identifiable products or competitors.
9. Testimonials - Advertisements should not contain or refer to any personal testimonial unless it is genuine, current, related to the experience of the person giving it and representative of typical and not exceptional cases. The claims in the testimonial should...
be verifiable.

10. **Privacy** - Unless prior permission has been obtained an advertisement should not portray or refer to any persons, whether in a private or public capacity, or refer to any person's property, in a way likely to convey the impression of a genuine endorsement.

11. **Advocacy Advertising** - Expression of opinion in advocacy advertising is an essential and desirable part of the functioning of a democratic society. Therefore such opinions may be robust. However, opinion should be clearly distinguishable from factual information. The identity of an advertiser in matters of public interest or political issue should be clear.

12. **Safety** - Advertisements should not, unless justifiable on educational or social grounds, contain any visual presentation or any description of dangerous or illegal practices or situations which encourage a disregard for safety.
ADVERTISING STANDARD AUTHORITY’S CODE FOR ADVERTISING GAMING AND GAMBLING

All advertisements for gambling and gaming (herein called gaming) shall adhere to the Principles and Guidelines set out in this Code. The Code is designed to ensure that advertising of gaming will be conducted in a manner that is socially responsible and does not mislead or deceive the consumer.

In interpreting the Code, emphasis will be placed on the Principles and the spirit and intention of the Code. An advertisement which does not adhere to the letter of a particular guideline nevertheless may or may not be in breach of the Code, depending on its compliance with the Principles and respect of the spirit and intention of the Code.

Definitions

"Minors" means people under the age at which they are legally entitled to participate in the particular gaming activity advertised.

Principle 1 - Advertisements should comply with the laws of New Zealand.

Guidelines

1(a) Advertisements should comply with the restriction on the sale of various gaming products and particularly age restrictions. The laws of New Zealand have various age restrictions for different gambling activities. Attention is drawn to the Racing Act 2003 and the Gambling Act 2003.

Principle 2 - Advertisements should observe a high standard of social responsibility.

Guidelines

2(a) Advertisements should not be directed at minors, have strong or evident appeal to minors, nor portray minors participating in activities in which they are under the legal age. Minors may appear in situations in which they would be naturally found (e.g. a family meal), provided there is no direct or implied suggestion that they will participate in the gaming.
2(b) Advertisements should not promote reliance on gaming as a means of relieving a person's financial or personal difficulties.
2(c) Advertisements should not encourage consumers to participate excessively or beyond their means.
2(d) Advertisements should not state or imply a promise of winning nor portray unrealistic outcomes.
2(e) Advertisements should not exaggerate the connection between the gaming activity and the use to which the profits may be put.

Principle 3 - Advertisements should not by implication, omission, ambiguity or exaggerated claim mislead or deceive or be likely to mislead or deceive consumers, abuse the trust of or exploit the lack of knowledge of consumers, exploit the superstitious or without justifiable reason play on fear.

Guidelines

3(a) Winning claims should be factual and able to be proven. The chances of winning or the size of the prize should not be exaggerated.
3(b) Advertisements should not state or imply that a player's skill can influence the outcome of a game unless the skill can affect the outcome of the game.
ADVERTISING STANDARDS AUTHORITY’S CODE FOR ADVERTISING TO CHILDREN

INTRODUCTION

All advertisements in all forms of media that influence children whether contained in children's media or otherwise shall adhere to the principles and guidelines set out in this Code. Food and beverage advertisements that influence children are subject to the Children's Code for Advertising Food. Reference should be made to the Interpretation section of the Codes of Practice.

The Code recognises that children are not a homogeneous group but have varying levels of maturity and understanding. Care should be taken to ensure that the product and style of advertisement are appropriate for the intended audience.

The Code recognises the need to extend a duty of care to protect children pursuant to the United Nation's Convention on the Rights of the Child ("Convention"). Special notice is to be taken of Article 3 of the Convention, which states, "the best interests of the child shall be a primary consideration". Article 13 recognises the child's right to freedom of expression. “This right shall include the freedom to seek, receive and impart information and ideas of all kinds.” Children therefore have the right to receive all kinds of information, including advertisements. However, Article 17(e) calls for “appropriate guidelines for the protection of the child from information and material injurious to his or her well-being.” This Code provides the “appropriate guidelines” for advertisements that influence children.

It is noted that the Convention defines the age of a child as under 18. This Code defines the age of a child as under 14 in line with the Children, Young Persons and their Families Act 1989 and aligns with the Broadcasting Standards Authority definition of a child.

In interpreting the code emphasis will be placed on compliance with both the principles and the spirit and intention of the code. The guidelines are examples, by no means exhaustive of how the principles are to be interpreted and applied. Upon considering a complaint, the ASCB is vested with discretion to ensure a common sense outcome.

Advertisements should comply with the laws of New Zealand and appropriate industry codes including the New Zealand Television Broadcasters code “Getting It Right for Children” available on www.nztdc.co.nz.

For the purposes of this Code:

"Children" means all persons below the age of 14.

"Social Responsibility" is embodied in the principles and guidelines of the Code and is integral to the consideration of the Advertising Standards Complaints Board. Previous decisions of the Complaints Board also guide its determinations, as do generally prevailing community standards.

Principle 1 - Advertisements should be prepared with and observe a high standard of social responsibility.

Guidelines

1(a) Children should not be urged in advertisements to ask their parents, guardians or caregivers to buy particular products for them.

1(b) Advertisements should not portray violence, undue aggression, or menacing or horrific elements likely to disturb children.
1(c) Advertisements should not encourage anti-social behaviour or depict children behaving in an anti-social manner, eg. vindictiveness and bullying, unless the purpose of the advertisement is to discourage such behaviour.

1(d) Advertisements should not suggest to children that they are inferior or will lack social acceptance for not having the advertised product.

1(e) Advertisements, except safety messages, should not contain any statement or visual presentation that could have the effect of portraying children in unsafe acts, showing them in unsafe situations, encouraging them to consort with strangers, or behaving in an unsafe way.

1(f) Advertisements, except safety messages, should not show products being used in an unsafe or dangerous manner, or which would be unsafe if used by children without proper supervision.

1(g) Advertisements should not depict toy weapons which are realistic (in size, shape and colour) and can be confused with real weapons.

1(h) Advertisements should not include sexual imagery and should not state or imply that children are sexual beings and/or that ownership or enjoyment of a product will enhance their sexuality.

1(i) Advertisements should not include images that are degrading to any individual or group.

1(j) Advertisements to children should not promote gambling or gaming. However, the responsible use of sales promotions schemes to children is permitted. (Refer to the Code for Advertising Gaming and Gambling)

**Principle 2 - Advertisements should not by implication, omission, ambiguity or exaggerated claim mislead or deceive or be likely to mislead or deceive children, abuse their trust or exploit their lack of knowledge or without reason play on fear.**

**Guidelines**

2(a) Advertisements should be clearly recognisable as such by children and separated from editorial, programmes or other non-advertising content.

2(b) Advertisements should be understood by children to whom they are directed, not be ambiguous, and not mislead as to the true size, value, nature of the advertised product.

2(c) If extra items are needed to use the product (eg. batteries) to produce the result shown or described (eg. paint, dolls clothes) this should be made clear. A product that is part of a series should be clearly indicated as such as well as the method of acquiring the series.

2(d) In the case of a product that must be assembled, this should be made clear, and where appropriate, the source of power and performance should be indicated.

2(e) If price is mentioned, the complete price of the product should be made clear, and advertisements should clearly indicate the cost of those items that constitute the original purchase and additional items that must be purchased separately.

2(f) Where reference is made to a competition the rules should be made clear and the value of prizes and the chances of winning should not be exaggerated.
Project element 1: Research

Lotto NZ – Responsible Gaming Programme
## Appendix 6: Glossary of terms

<table>
<thead>
<tr>
<th>Term</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2nd Chance</strong></td>
<td>Non-winning instant-win tickets can be entered online for a second chance to win a cash prize. Each week, 5 prizes of $1,000 can be won.</td>
</tr>
<tr>
<td><strong>Advertising Standards Authority (ASA)</strong></td>
<td>Advertising in New Zealand is self-regulated by the communications and media industry. At the heart of the system is the ASA, which is responsible for setting and enforcing the standards that govern advertising in all media. All advertising in New Zealand is required to comply with the ASA’s advertising codes of practice.</td>
</tr>
<tr>
<td><strong>At Risk Retailer programme</strong></td>
<td>The programme gathers data on each of the retail outlets in Lotto NZ’s network, including staff purchases on lottery products, to identify retailers that post a higher risk of committing fraud. It then puts controls in place to minimise the risk.</td>
</tr>
<tr>
<td><strong>Auckland University of Technology (AUT)</strong></td>
<td>AUT is New Zealand’s second largest university, with three campuses and more than 26,000 students enrolled in undergraduate and postgraduate programmes. AUT’s Gambling and Addictions Research Centre brings together research that improves New Zealanders’ understanding of how gambling and addictions affect society, and enhances policy and professional practice.</td>
</tr>
<tr>
<td><strong>Choice Not Chance</strong></td>
<td>Choice Not Chance in New Zealand’s public education campaign to strengthen society’s understanding, awareness of, and response to gambling-related harms. It is led by the Health Promotion Agency. The complementary Choice Not Chance website provides information to help New Zealanders understand gambling and determine how much is too much.</td>
</tr>
<tr>
<td><strong>Crown entity</strong></td>
<td>Crown entities are bodies established by law in which the Government has a controlling interest.</td>
</tr>
<tr>
<td><strong>Department of Internal Affairs (DIA)</strong></td>
<td>The DIA is the primary gambling regulator and main policy advisor to the New Zealand Government on gambling regulatory issues. The DIA’s responsible Minister is the Minister of Internal Affairs. The DIA administers the Gambling Act 2003 and its regulations, issues licences for gambling activities, ensures compliance with the legislation and publishes statistical and other information concerning gambling. The DIA’s role includes the main regulatory aspects of gambling harm prevention and minimisation.</td>
</tr>
<tr>
<td><strong>FY15</strong></td>
<td>This refers to Lotto NZ’s 2015 financial year, which ran from 1 July 2014 to 30 June 2015.</td>
</tr>
<tr>
<td><strong>FY16</strong></td>
<td>This refers to Lotto NZ’s 2016 financial year, which ran from 1 July 2015 to 30 June 2016.</td>
</tr>
<tr>
<td><strong>FY17</strong></td>
<td>This refers to Lotto NZ’s 2017 financial year, which runs from 1 July 2016 to 30 June 2017.</td>
</tr>
<tr>
<td><strong>Gambling Act 2003</strong></td>
<td>The Act is the legislation that all gambling bodies in New Zealand are bound to.</td>
</tr>
<tr>
<td><strong>Gambling Helpline</strong></td>
<td>The Gambling Helpline is a 24-hour, 7-days-a-week, freephone helpline for those worried about their gambling or the gambling of others. Through the helpline, New Zealanders can receive immediate support, get referred to other gambling support services or access information services for problem gambling. The Gambling Helpline is associated with the Government’s Choice Not Chance campaign to end harmful gambling.</td>
</tr>
<tr>
<td><strong>GAM-GaRD</strong></td>
<td>Gambling Assessment Measure - Guidance about Responsible Design (GAM-GaRD) is an external tool designed to identify how risky a proposed game is likely to be for a vulnerable player.</td>
</tr>
<tr>
<td><strong>Harm Minimisation Committee (HMC)</strong></td>
<td>An internal Lotto NZ committee that provides an additional channel of review to ensure adherence to responsible gaming principles, in particular, around game design and marketing activity. The committee comprises the Chief Marketing Officer, the Head of Risk and Assurance and the General Manager Corporate Communications and Social Responsibility.</td>
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<tr>
<td><strong>Health Promotion Agency (HPA)</strong></td>
<td>The HPA leads promotion of gambling education in New Zealand. It has developed and implemented a national social marketing programme on behalf of the Ministry of Health. The HPA works on reaching and educating New Zealanders through &quot;promoting, enabling and informing&quot;. HPA campaigns and activities aim to promote the health and wellbeing of all New Zealanders across key areas including alcohol, immunisation, mental health, smoking, gambling, nutrition and physical activity.</td>
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<tr>
<td><strong>High spender emails</strong></td>
<td>Our remote gaming channel has mandatory spending limits in place for all registered players. Lotto NZ monitors the spending behaviour of registered MyLotto players and emails customers who consistently reach their spending limits to remind them about responsible play behaviour and the tools and resources available to them.</td>
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<tr>
<td><strong>Intervention services data</strong></td>
<td>The problem gambling levy is used to fund intervention services for New Zealand, which includes helpline and web-based services, psychosocial interventions and support, data collection and reporting and workforce development. Intervention client data represents the number of clients who have received problem gambling treatment services and who have identified to the service provider a primary problem gambling mode that is causing them harm.</td>
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<tr>
<td><strong>Lotto App</strong></td>
<td>Lotto’s smart device ticket checker application.</td>
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<tr>
<td><strong>Lotto subscription</strong></td>
<td>MyLotto (online) players can choose to set up a three-month, six-month or 12-month subscription to automatically purchase their Lotto ticket(s) on their behalf each week.</td>
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<tr>
<td><strong>Ministry of Health (MoH)</strong></td>
<td>Under the Gambling Act 2003, the Ministry is responsible for preventing and minimising the harm caused by gambling, including problem gambling, and is responsible for monitoring the level of problem gambling in New Zealand. As part of its role to minimise the harm from gambling, the Ministry is responsible for implementing the integrated problem gambling strategy focused on public health including promotion of public health, treatment services, research and evaluation.</td>
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<tr>
<td><strong>MyLotto</strong></td>
<td>Lotto NZ’s website and online gaming environment - available through a desktop or a mobile-optimised site.</td>
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<tr>
<td><strong>Mystery shopping</strong></td>
<td>Under Lotto NZ’s mystery shopping programme, retailers are visited to ensure they are meeting Lotto NZ’s operating and responsible gaming standards. We test each retailer’s adherence to our policy to ask any instant-win ticket customer who looks under the age of 25 for identification and not to serve them if they are unable to provide acceptable identification.</td>
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<tr>
<td><strong>Newsflash</strong></td>
<td>A monthly newsletter sent to all Lotto NZ retailers providing information on products, community funding and other business initiatives including Lotto NZ’s responsible gaming programme.</td>
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<tr>
<td><strong>New Zealand Lottery Grants Board (LGB)</strong></td>
<td>The LGB is part of the Department of Internal Affairs and is responsible for distributing all lottery funding.</td>
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<tr>
<td><strong>Problem Gambling Envelope</strong></td>
<td>A discreet wallet of information for retailers to give to customers who they are concerned about. It contains examples of behaviour that might be considered linked to problem gambling, contact details for problem gambling treatment providers and testimonials of people who have sought help for gambling.</td>
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<tr>
<td><strong>Problem Gambling Foundation (PGF)</strong></td>
<td>The PGF is a national non-profit organisation predominantly funded by the Ministry of Health with funds received from the Problem Gambling Levy. The PGF is the largest single treatment provider for problem gambling in Australasia, with 63 staff, 13 branch offices and 14 satellite offices throughout New Zealand. The PGF is committed to health promotion that contributes to safer gambling practices through community education and the development of regulations and standards. Counselling is free of charge to the gambler, their family and others affected by problem gambling.</td>
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<tr>
<td><strong>Problem Gambling Levy (PGL)</strong></td>
<td>All gambling organisations in New Zealand pay a Problem Gambling Levy based on the level of attributable harm (using the measure of client interventions to problem gambling services) and total revenue in the sector. The problem gambling levy is weighted 10 percent on expenditure and 90 percent on harm. The lower weighting on expenditure recognises relatively benign forms of gaming with high expenditure, such as lotteries. These funds pay for the implementation of public health services, intervention services, research, evaluation and workforce development.</td>
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<tr>
<td><strong>The International Think Tank on Gambling Research, Policy and Practice</strong></td>
<td>The Think Tank gathers an international network of scientists, researchers, policy makers, service providers, gambling industry members, consumers and interested others to collaborate to advance understanding of gambling in the context of public health and social and economic development.</td>
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<tr>
<td><strong>R18</strong></td>
<td>Restricted to players 18 years of age and over.</td>
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<tr>
<td><strong>Responsible Gaming Governance Committee</strong></td>
<td>This committee was established in early 2014 and plays an integral role internally in providing oversight and input into our responsible gaming programme. The committee reviews responsible gaming data as it becomes available, including problem gambling presentation data, mystery shopping results and retailer high spending data. The committee meets quarterly as part of Lotto NZ’s Board meeting.</td>
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<tr>
<td><strong>Retailer Operations Manual (ROM)</strong></td>
<td>The manual outlines each retailer’s rights and obligations in operating a Lotto NZ outlet, important procedures and the rules of the game. It also includes a section on Lotto NZ’s commitment to responsible play and an overview of Lotto NZ’s responsible gaming programme.</td>
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<tr>
<td><strong>Scientific Games</strong></td>
<td>Scientific Games is a lottery games provider that Lotto NZ works closely with in the design and production of its Instant Kiwi games.</td>
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<tr>
<td><strong>Self-exclusion</strong></td>
<td>Players can choose to exclude themselves from playing some or all of our games online or in-store.</td>
</tr>
<tr>
<td><strong>Territory representatives (TRs)</strong></td>
<td>Lotto NZ’s sales team, responsible for managing relationships with independent Lotto retailers.</td>
</tr>
</tbody>
</table>
Directory

Auckland office
Level 1, 73 Remuera Road
Remuera, Auckland 1050
PO Box 8929, Symonds Street
Auckland 1150
Telephone 09 356 3800

Wellington office
Level 1
The Woolstore Design Centre
258 Thorndon Quay
PO Box 9448
Wellington 6011

Christchurch office
66-68 Mandeville Street
PO Box 8609
Riccarton
Christchurch 8011

Board members
Judy Kirk, ONZM
Chair
Tony Mossman
Deputy Chair
Miranda Burdon
Mark Gilbert
Keiran Horne
Logan Sears

Executive team
Wayne Pickup
Chief Executive
Dan Balasoglou
Chief Financial Officer
Ben Coney
Chief Innovation and Technology Officer
Guy Cousins
Chief Marketing Officer
Kathryn Haworth
General Manager, Strategy
Chris Lyman
Chief Operating Officer
Amie McKinlay
General Manager,
People and Culture
Emilia Mazur
General Manager,
Corporate Communications
and Social Responsibility

Contact
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