

Mr T Armstrong
Phone-paid Services Authority
25th Floor
40 Bank Street
LONDON
E14 5NR

17th April 2018

Dear Mr Armstrong,

Many thanks for the opportunity to respond to the PSA consultation on 'Society lottery services and adoption of special conditions'.

As context, Oxfam has been running a lottery since summer 2016, and currently has around 6,000 players. The ticket price is £1, and draws take place weekly, with 35 winners being drawn, and a maximum prize of £1000. We believe that being able to promote our lottery by means of SMS could provide an improved player journey and allow us to increase the charitable funds we raise by increasing the number of players. We have both a Remote and Non-Remote Gambling Licence and are members of the Lotteries Council.

Our responses to your questions are given below:

Q1: Does this definition of *society lottery services* suitably align with the gambling legislation and assist in identifying relevant phone-paid services that may be subject to specific PSA regulations?

- Yes we agree that it does align with the gambling legislation definition.

Q2: Do you agree with this approach to guidance development in relation to society lottery services?

- Yes, we think that consultation with key stakeholders is the best way to develop effective regulatory guidance

Q3: Are there any other pieces of PSA guidance that you consider will require consideration that does not appear in the list above?

- None that we are aware of.

Q4: To what extent do you agree with the PSA risk assessment as set out above in section 2? Please give evidence in support of your submissions?

- In our view, society lotteries are not high risk and on this basis do not believe that Special Conditions are required given that society lotteries are already tightly regulated.

Q5: To what extent do these provisions, SOL1 and SOL2, mitigate any risks associated with under-age use of gambling services and address concerns associated with vulnerable groups?

- As stated above, we do not believe that Special Conditions are necessary.

Q6: Do you agree with our assessment that ticketing requirements and wider gambling regulations are sufficient for users, including any vulnerable groups, tracking their usage?

- Yes, we agree

Q7: Does the list in SOL3 contain the right types of information needed to give consumers adequate information associated with society lottery services? Please provide an explanation regarding any additional or amended requirements where you have suggested changes.

- As per Q4 – we do not believe that Special Conditions are necessary.

Q8: To what extent do SOL4 and SOL5 offer clarity at the point of purchase and achieve a requisite level of consent to charge in relation to society lottery services?

- As per Q4

Q9: To what extent do SOL6 and SOL7 give consumers awareness of their use of phone-paid services and an ability to track spending over time?

- As per Q4

Q10: Do you agree that compliance with SOL7 reduces the need for a separate provision relating to subscription spend reminders? Please provide evidence in support of your submissions.

- We do not feel that Special Conditions are necessary, and also feel that SOL7 is excessive. With established automated subscription payments such as direct debit there is no need to go to these lengths. The player is committing to £1 a week for a relatively small prize.

Q11: Do you agree that spend caps are not required for society lottery services based on the information provided under SOL6 and SOL7 and that the notice issued under paragraph 3.12.6 should be amended accordingly?

- We agree that spend caps are not required.

Q12: Does the list in SOL8 contain the right types of information to support the regulation of society lottery services and equip the PSA to handle any complaints and enquiries that may arise?

- As per Q4

Thank you again for the chance to feed in to the consultation. I hope our answers are clear but if you require further input or clarification please do not hesitate to contact me

Yours sincerely

James Terry
Head of Fundraising Compliance, Oxfam