

**CONTROLS CASE – RECORD BREACH**

Number	Date of incident	Background	Licence Condition	Description	Regulatory concerns and action taken	Sanction
1.	25.03.16	EuroMillions: incorrect Lucky Star result published	<p>Condition 5.1 requires the Licensee to ensure that at all times its running of the National Lottery is Fit for Purpose, as that phrase is defined in the Licence.</p> <p>Condition 5.10A(b) of the Licence to operate the National Lottery requires the Licensee to ensure that all Processes and Procedures are Fit for Purpose.</p> <p>Condition 7.42 of the Licence requires the Licensee to ensure that material to enable a Player to play in a Constituent Lottery is accurate, does not mislead players and is compatible with the terms and conditions, rules, procedures and game specific rules of the Constituent Lottery.</p>	<p>Following the EuroMillions draw on Friday 25 March 2016, and between 22:00 25 March and 08:00 26 March 2016, an incorrect EuroMillions lucky star number was published on the National Lottery website results page, mobile apps and BBC Red Button service.</p> <p>Camelot advised the Commission that the incorrect publication was caused by human error while Camelot's IT Operations team manually inputted the EuroMillions results in to drawn order on the website.</p>	<p>The provision of accurate results is important to the overall running of and reputation of the National Lottery and in this instance this resulted in players being misled as to the correct results.</p> <p>This is another control related failing and is an indication that Processes and Procedures were not Fit for Purpose.</p> <p>However, player impact was limited to players on the match 1 + 2 lucky stars prize tier (£5.50 prize). The main winning EuroMillions numbers and UK Millionaire Maker codes were correct at all times, as were all other Camelot-owned sources for displaying draw results.</p> <p>Camelot took immediate steps to correct the error when it became aware and having taken on board learning from previous events, displaying messages on various touchpoints including promptly displaying a prominent message on the National Lottery website to highlight the error to players and prompt them to re-check their tickets along with sending an email to registered players.</p> <p>Camelot's Operational Excellence Programme is the appropriate way to address the issues regarding Processes and Procedures.</p>	This incident was a contravention of the licence requirements and represents a licence breach which will be recorded.
2.	27.04.16	EuroMillions: incorrect promotional advert on the National Lottery homepage.	<p>Condition 5.1 requires the Licensee to ensure that at all times its running of the National Lottery is Fit for Purpose, as that phrase is defined in the Licence.</p> <p>Condition 5.10A(b) of the Licence to operate the National Lottery requires the Licensee to ensure that all Processes and Procedures are Fit for Purpose.</p> <p>Condition 7.42 of the Licence requires the Licensee to ensure that material to enable a Player to play in a Constituent Lottery is accurate, does not mislead players and is compatible with the terms and conditions, rules, procedures and game specific rules of the Constituent Lottery.</p>	<p>An advert for Euro Millions Mega Friday Draw on the National Lottery homepage incorrectly stated that there would be x10 UK millionaire prizes, rather than x5 for a period of 2hrs 40mins on 27 April 2016.</p>	<p>The provision of accurate information including available prizes is important to the overall running of and reputation of the National Lottery and in this instance this resulted in players being misled as to the correct prizes available for the specific draw.</p> <p>This is another control related failing and is an indication that Processes and Procedures were not Fit for Purpose.</p> <p>While there are licence breaches and another control failing, there was no real impact on individuals in this instance. The error was live for a relatively short period of time and Camelot took action to address it as soon as it became aware. Complaints to Camelot were limited to 3 individuals.</p> <p>Camelot's Operational Excellence Programme is the appropriate way to address the issues regarding Processes and Procedures.</p>	This incident was a contravention of the licence requirements and represents a licence breach which will be recorded.
3.	23.06.16	Lotto: second chance draw ticket misprint (Lotto ticket)	<p>Condition 5.1 requires the Licensee to ensure that at all times its running of the National Lottery is Fit for Purpose, as that phrase is defined in the Licence.</p>	<p>The June Lotto Extra Chance Draw promotion allowed players who had bought a ticket for a Lotto draw in June 2016 the opportunity to enter</p>	<p>The provision of accurate information including available prizes is important to the overall running of and reputation of the National Lottery and in this instance this resulted in players being misled as to their eligibility to enter a National Lottery draw.</p>	This incident was a contravention of the licence requirements and represents a licence breach which will be recorded.

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		messaging issue)	<p>Purpose, as that phrase is defined in the Licence.</p> <p>Condition 5.10A(b) of the Licence to operate the National Lottery requires the Licensee to ensure that all Processes and Procedures are Fit for Purpose.</p> <p>Condition 7.42 of the Licence requires the Licensee to ensure that material to enable a Player to play in a Constituent Lottery is accurate, does not mislead players and is compatible with the terms and conditions, rules, procedures and game specific rules of the Constituent Lottery.</p>	<p>into a promotional prize draw for a chance to win £1 million.</p> <p>Tickets had to be purchased by 29 June 2016 to be valid for the draw.</p> <p>Messaging on Lotto tickets promoting the Extra Chance Draw overrun by two days, appearing on tickets bought on 30 June and 1 July.</p> <p>Camelot advised the Commission that the overrun was as a result of human error as the relevant team did not identify that the promotional message should end by 29 June during the content creation and approval process.</p>	<p>This is another control related failing and is an indication that Processes and Procedures were not Fit for Purpose.</p> <p>Camelot has reviewed and updated its relevant process to mitigate the risk of future reoccurrence.</p> <p>While there are licence breaches and some reputational impact there was no actual harm to individuals in this instance other than that they were not entered into a draw they may have thought they were entered into after purchasing the ticket. Complaints to Camelot were relatively low.</p> <p>Camelot's Operational Excellence Programme is the appropriate way to address the issues regarding Processes and Procedures.</p>	
4.	21.09.16	IIWG promotional email sent to self-excluded players	<p>Condition 5.1 requires the Licensee to ensure that at all times its running of the National Lottery is Fit for Purpose, as that phrase is defined in the Licence.</p> <p>Condition 5.10A(b) of the Licence to operate the National Lottery requires the Licensee to ensure that all Processes and Procedures are Fit for Purpose.</p>	<p>On Monday 19 September 2016 Camelot activated a promotional campaign which offered a select number of players a chance to play a free Interactive Instant Win Game (IIWG), named "GameStore Grand".</p> <p>In marketing the promotion, the campaign included 4,518 players with account self-exclusions or play limits in place.</p> <p>Camelot advised the Commission that this error was a result of human oversight when applying the usual 'suppression rules' as part of the campaign's creation.</p>	<p>Camelot has failed to ensure it has protected the interests of every participant in the lottery by sending this marketing campaign. It is particularly important that the interests of vulnerable players such as self-excluded players are protected.</p> <p>This is another control related failing and is an indication that Processes and Procedures were not Fit for Purpose.</p> <p>On becoming aware of the issue, Camelot sought to remove promotion notifications from the self-excluded players' accounts and sent targeted emails apologising for the error. In addition it has undertaken a full review of the process and taken steps to address and mitigate the risk of future occurrence.</p> <p>While there are licence breaches, the impact on self-excluded players in this instance was limited as system controls ensured they were prevented from playing the game.</p> <p>Camelot's Operational Excellence Programme is the appropriate way to address the issues regarding Processes and Procedures.</p>	This incident was a contravention of the licence requirements and represents a licence breach which will be recorded.
5.	10.10.16	Lotto: Match2 free play ticket retail terminal printing failures	<p>Condition 5.1 requires the Licensee to ensure that at all times its running of the National Lottery is Fit for Purpose, as that phrase is defined in the Licence.</p> <p>Condition 5.10A(b) of the Licence to operate the National Lottery</p>	<p>The free Lotto Match Two Lucky Dip tickets (M2 LD) prize tier was introduced as part of a refreshed Lotto game which launched on 8 October 2015.</p> <p>If a printing error occurs for a normal ticket purchase these</p>	<p>The provision of accurate information including ensuring material is available to enable a player to claim prizes is important to the overall running of and reputation of the National Lottery and in this instance this has resulted in players being inconvenienced as they are required to take additional action in order to ascertain details of their M2 LD ticket and if they have subsequently won a further prize.</p> <p>This is another control related failing and is an indication that Processes and Procedures were not Fit for Purpose.</p>	This incident was a contravention of the licence requirements and represents a licence breach which will be recorded.

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			<p>requires the Licensee to ensure that all Processes and Procedures are Fit for Purpose.</p> <p>Condition 7.42 of the Licence requires the Licensee to ensure that material to enable a Player to play in a Constituent Lottery is accurate, does not mislead players and is compatible with the terms and conditions, rules, procedures and game specific rules of the Constituent Lottery.</p>	<p>can be reissued by a retailer. However, for security and technical reasons, retailers are not able to cancel and reissue prizes. As a Lotto free M2 LD ticket is a prize, the retailer is not able to cancel and reissue the ticket if it fails to print.</p> <p>If a M2 LD ticket does fail to print correctly, the numbers assigned to the M2 ticket will still be wagered into the draw requested by the player, but as the player will not be presented with their physical M2 LD ticket, they are required to contact Camelot (in line with the TNL 'Lost, Stolen, Destroyed or Damaged Tickets' process) in order to find their M2 LD ticket numbers and whether they are entitled to any subsequent prize.</p>	<p>Printing errors do occur and while seeking resolution for printing errors generally, Camelot identified opportunities to improve the experience of customers impacted by a M2 LD print error, and minimise any inconvenience that may be caused.</p> <p>The result of M2 LD printing errors is that individuals do not get a physical copy of their M2 LD ticket due to a printing error – the ticket is however still wagered in the relevant draw. The impact on players was limited - they were inconvenienced in that they are required to follow the 'Lost, Stolen, Destroyed or Damaged Tickets' process.</p> <p>Camelot's Operational Excellence Programme is the appropriate way to address the issues regarding Processes and Procedures.</p>	
6.	09.11.16	Online account: DPA breach as unauthorised access of player account by third party enabled	<p>Condition 5.1 requires the Licensee to ensure that at all times its running of the National Lottery is Fit for Purpose, as that phrase is defined in the Licence.</p> <p>Condition 5.10A(b) of the Licence to operate the National Lottery requires the Licensee to ensure that all Processes and Procedures are Fit for Purpose.</p> <p>Condition 22.1 of the Licence to operate the National Lottery requires the Licensee to ensure that all processing of personal data incorporated in any database maintained by or on behalf of is carried out in compliance with the Data Protection Act and any equivalent legislation.</p>	For a short period, Player A was able to access Player B's online account.	<p>Ensuring the integrity of customer data and compliance with relevant legislation is important to maintaining the integrity and reputation of the National Lottery.</p> <p>This is another control related failing and is an indication that Processes and Procedures were not Fit for Purpose.</p> <p>Camelot advised the Commission that the issue was a result of human error when a customer service representative mistakenly changing the email address on Player A's account to that of Player B's before progressing a password reset.</p> <p>On becoming aware of the issue (when notified by Player A) Camelot disabled access in under 4 minutes. Camelot addressed the issue on becoming aware and in addition carried out a full review of its password reset process to identify risks it could mitigate going forward. In addition it implemented a retraining programme for staff.</p> <p>While there are licence breaches, the incident was resolved swiftly and was of limited impact on one individual.</p> <p>Camelot's Operational Excellence Programme is the appropriate way to address the issues regarding Processes and Procedures.</p>	This incident was a contravention of the licence requirements and represents a licence breach which will be recorded.
7.	14.11.16	Online marketing campaign promotion: unsolicited emails sent	Condition 5.1 requires the Licensee to ensure that at all times its running of the National Lottery is Fit for	On Monday 14 November, 15,043 National Lottery players were sent a marketing campaign email, despite not having opted-in to	<p>Ensuring the integrity of customer data and compliance with relevant legislation is important to maintaining the integrity and reputation of the National Lottery.</p> <p>This is another control related failing and is an indication that Processes and Procedures were not Fit for Purpose.</p>	This incident was a contravention of the licence requirements and represents a licence breach which will be recorded.

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		to players not opted in to receive marketing materials	<p>Purpose, as that phrase is defined in the Licence.</p> <p>Condition 5.10A(b) of the Licence to operate the National Lottery requires the Licensee to ensure that all Processes and Procedures are Fit for Purpose.</p> <p>Condition 22.1 of the Licence to operate the National Lottery requires the Licensee to ensure that all processing of personal data incorporated in any database maintained by or on behalf of is carried out in compliance with the Data Protection Act and any equivalent legislation.</p>	<p>receive this type of marketing communication.</p> <p>Camelot advised the Commission that the emails in question were part of an automated marketing campaign, which was disrupted by an unexpected and short-term network outage. This network outage disrupted the automated process of removing opted-out players before initiating the campaign.</p>	<p>On discovering the issue, Camelot's digital team halted all automated email campaigns, pending the conclusion of an investigation. This has identified that the script which ran the automated campaign was not robust enough to handle the impact of an unexpected network outage. As a result, the script has been rewritten.</p> <p>The impact on individuals has been limited and Camelot took steps to mitigate risk of future occurrence.</p> <p>Camelot's Operational Excellence Programme, is the appropriate way to address the issues regarding Processes and Procedures.</p>	
8.	19.02.17	Duplicate free Match 2 Lucky dips	<p>Condition 5.1 requires the Licensee to ensure that at all times its running of the National Lottery is Fit for Purpose, as that phrase is defined in the Licence.</p> <p>Condition 5.10A(b) of the Licence to operate the National Lottery requires the Licensee to ensure that all Processes and Procedures are Fit for Purpose.</p> <p>Condition 7.42 of the Licence requires the Licensee to ensure that material to enable a Player to play in a Constituent Lottery is accurate, does not mislead players and is compatible with the terms and conditions, rules, procedures and game specific rules of the Constituent Lottery.</p>	<p>As part of the Lotto prize structure, if a player matches two (M2) main numbers, they win a free Lotto Lucky Dip ticket for a future Lotto draw. For online players, any free M2 Lucky Dips are automatically redeemed after the winning draw, and wagered into either the forthcoming Wednesday or Saturday draw</p> <p>Following the Saturday 18 February 2017 Lotto draw, 47 834 online players who had won a M2 Lucky Dip ticket prize, received twice their entitled free M2 Lucky Dips resulting in 50,212 additional M2 free Lucky Dip prizes.</p> <p>Due to a short term network issue, when processing the wagering of the M2 Lucky Dip tickets, the allocation of these tickets was interrupted. On restarting the prize allocation process, these prize allocations were processed twice, and secondary M2 Lucky dips were issued to players and wagered into forthcoming Wednesday and Saturday draws.</p>	<p>The provision of accurate information including available prizes is important to the overall running of and reputation of the National Lottery and in this instance this resulted in players being misled as to their prize entitlement thinking they had won two tickets when they were only entitled to one. This is another control related failing and is an indication that Processes and Procedures were not Fit for Purpose</p> <p>Camelot acted to remove all erroneous secondary M2 Lucky Dip tickets that players were not entitled to from the forthcoming Wednesday and Saturday draws. It also removed the incorrectly issued secondary M2 Lucky Dip tickets from players Interactive Accounts. Camelot has updated its IT Operations procedures to add appropriate checks that mitigate the risk of any future similar process failings that could result in the allocation of erroneous secondary M2 Lucky Dips.</p> <p>There was limited impact on players as they were not entitled to the duplicate ticket and there was no impact on the integrity of the upcoming draws. Camelot was in this instance able to evidence its decision making against a tight timeframe in the absence of a defined process.</p> <p>Camelot's Operational Excellence Programme is the appropriate way to address the issues regarding Processes and Procedures.</p>	This incident was a contravention of the licence requirements and represents a licence breach which will be recorded.

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9.	14.08.17	Offensive content on British Athletics Twitter campaign	<p>Condition 5.1 requires the Licensee to ensure that at all times its running of the National Lottery is Fit for Purpose, as that phrase is defined in the Licence.</p> <p>Condition 5.10A(b) of the Licence to operate the National Lottery requires the Licensee to ensure that all Processes and Procedures are Fit for Purpose.</p>	<p>On the evening of Monday 14th August 2017 c. 60 Twitter users targeted the National Lottery's UK Athletics Twitter campaign which had been running since 14th July. The purpose of the campaign was to thank players for their support of the lottery funded athletes by showing a picture of an athlete holding up a thank you card showing the user's twitter name.</p> <p>The incident occurred when a number of Twitter users misused the campaign mechanism; updating their profile name to an inappropriate message and tweeting the National Lottery using the #Represent hashtag. This meant that they received an automatic 'tweet' from the National Lottery's Twitter account with an image of a British Athlete saying "Thank you" and displaying an image of the user's changed name.</p>	<p>This incident brought into question if the National Lottery is being run with all due propriety and impacts on its reputation.</p> <p>This is another control related failing and is an indication that Processes and Procedures were not Fit for Purpose.</p> <p>Camelot advised the Commission that a risk assessment was undertaken and as well as a profanity screening, a number of controls were specified by Camelot to its third party supplier to ensure that personalised messages from @TNLUK Twitter were from legitimate users and that content was safe. The third party provider was however unable to provide the requested controls but this was not identified by Camelot so the risk was not identified and escalated prior to the campaign launch.</p> <p>Camelot acted to remove the posts on the National Lottery profile manually (but were unable to remove any 'retweets'). In addition all non-standard social campaigns were ceased while it sought to implement more rigour and controls.</p> <p>While recognising the potential impact on the sports personalities and charities targeted by the offensive content, there was no direct impact on National Lottery players.</p> <p>Camelot's Operational Excellence Programme is the appropriate way to address the issues regarding Processes and Procedures.</p>	<p>This incident was a contravention of the licence requirements and represents a licence breach which will be recorded.</p>
10.	6 October 2017	Euromillions – incorrect date in promotional advertising	<p>Condition 5.1 requires the Licensee to ensure that at all times its running of the National Lottery is Fit for Purpose, as that phrase is defined in the Licence.</p> <p>Condition 5.10A(b) of the Licence to operate the National Lottery requires the Licensee to ensure that all Processes and Procedures are Fit for Purpose.</p> <p>Condition 7.42 of the Licence requires the Licensee to ensure that material to enable a Player to play in a Constituent Lottery is accurate, does not mislead players and is compatible with the terms and conditions, rules, procedures and game specific rules of the Constituent Lottery.</p>	<p>As part of a EuroMillions promotional campaign, a "13 millionaires on Friday 13<sup>th</sup>" promotion was put in place for 13 October. As part of the campaign, a media screen advert in retail stores was created to promote the date and prizes. It was published on the morning of Friday 6 October. The media screens, were displaying the date of Friday 13 September instead of Friday 13 October for a period of 24 hours.</p> <p>Camelot advised the Commission that the cause of the incident was due to human error - a failure of an individual to follow the correct agreed Campaign Development Process.</p>	<p>The provision of accurate information including available prizes is important to the overall running of and reputation of the National Lottery.</p> <p>This is another control related failing and is an indication that Processes and Procedures were not Fit for Purpose.</p> <p>Camelot removed the publication within 24 hours and acted to mitigate the risk of future occurrence by reviewing its processes.</p> <p>While there are licence breaches there was little impact on players as a player would not have been able to buy a draw ticket for that date with an incorrect expectation of prizes, and sufficient time still remained with the correct screen information that players still had the opportunity to participate in the promotion</p> <p>Camelot's Operational Excellence Programme is the appropriate way to address the issues regarding Processes and Procedures.</p>	<p>This incident was a contravention of the licence requirements and represents a licence breach which will be recorded.</p>

