

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2023/24

CAMELOT

Introduction

Operating with integrity remained at the heart of everything Camelot UK Lotteries (“CUKL”) did during FY23/24, which included our commitment to preventing modern slavery and human trafficking, something we prioritised as a part of our Corporate Responsibility strategy.

In this Statement covering the FY23/24 – to 31st Jan 24, published in accordance with section 54 of the Modern Slavery Act 2015, we detail the actions we took to recognise and mitigate any possible risks of modern slavery and human trafficking in our business and supply chain.

CUKL was the licensed operator of The National Lottery (“TNL”) from its launch in 1994 until 2024. The third National Lottery licence commenced in February 2009 and ran until the end of January 2024. Allwyn UK is the new operator of the fourth National Lottery licence.

About us

As operator of The National Lottery, we were committed to operating our business in a socially responsible way, with an overarching aim of maximising returns to Good Causes through selling National Lottery products. We achieved this by aligning our operations and processes with ethical standards and corporate values. From the way in which we designed, promoted, and launched new games to how we collaborated with our suppliers and retail partners.

Our Supply Chain

At CUKL, we were focused on preventing all aspects of modern slavery and human trafficking in our associated supply chains. We recognised that having effective and appropriate structures, processes and controls in place was crucial.

In FY23/24, we partnered with 454 suppliers, with a significant proportion of our expenditure over that time being on IT and marketing services. We continued to operate a decentralised procurement model with supplier management being the responsibility of Camelot Relationship Managers across the business supported by the Group Procurement team. This team helped by offering subject matter expertise and guidance, aiding in supplier selection, negotiating commercial terms and ensuring that all suppliers were engaged on appropriate contract terms, to mitigate any business risk.

We carried out due diligence at all stages of engagement within our supply chain, including the on-boarding of new suppliers, periodically reviewing existing ones and formally off-boarding those that are no longer required. In addition, we undertook regular monitoring and proactively engaged with suppliers through surveys and audits, ensuring our standards were being met and that suppliers were compliant with applicable legislation and regulations.

It was crucial that our suppliers recognised and understood our commitments to preventing modern slavery and human trafficking, so we clearly communicated our expectations of them, their employees and their subcontractors.

In FY23/24, we completed a supplier conduct review with high-risk suppliers to identify risks and evaluate compliance across a range of areas, including modern slavery and human trafficking. We are pleased to report that no issues were detected.

In addition, we conducted a Modern Slavery supplier assessment, which was focused solely on compliance with the Modern Slavery Act 2015. It was issued to suppliers who were selected based on a qualifying criteria linked to the goods and/or services they supply.

Each supplier was asked to confirm their approach to the following:

- Identification of modern slavery and human trafficking risks specific to their organisation (if any) and the measures they have put in place to mitigate such risks.
- Methods adopted during their own supplier selection processes – to ensure that subcontractors have adequate Modern Slavery policies and procedures in place.
- Process for monitoring employee and subcontractor compliance with the Modern Slavery Act 2015, and relevant policies and procedures.
- Modern Slavery training provided to their employees and, where relevant, the employees of their subcontractors.

All of the assessed suppliers were able to confirm their compliance with the Modern Slavery Act 2015 and provided confirmation of having appropriate policies and procedures in place, where appropriate.

As only a selection of suppliers participated in the assessment, we provided all our other suppliers with access to our Modern Slavery and Human Trafficking Statement and reaffirmed our expectations to them regarding modern slavery and human trafficking. This engagement also provided suppliers with the opportunity to ask any questions or express concerns on this topic.

National Lottery Retailers

Our retail estate consisted of over 40,000 National Lottery retailers in FY23/24, with a combination of independent and head office-led retailers – all of which were required to sign our National Lottery Retailer Agreement. This set out our expectations and held them to high standards, including compliance with all applicable laws and regulations – such as The Modern Slavery Act 2015.

During FY23/24, we continued to raise awareness about modern slavery and human trafficking, and in an effort to prevent it, we shared key messages through a variety of channels. Our National Lottery Retailer Hub website was updated with helpful sources of information, including supportive materials that retailers could use when training their employees on preventing modern slavery and human trafficking, as well as housing our latest statement. We also published educational content in our retailer magazine, Jackpot, with the aim of raising awareness and educating retailers on how to identify and prevent modern slavery.

Alongside these efforts with our retailers, we delivered an enhanced modern slavery and human trafficking online training module for our retail employees. This training module, which was compulsory, educated employees on how to identify instances of modern slavery or human trafficking within our business, in our supply chain and within a retail environment. The module concluded with a test, which everyone was required to pass, ensuring they possessed the necessary knowledge and skills to best support our retail partners.

Policies and Information

Whistleblowing Policy

Our Whistleblowing Policy, which all CUKL employees and contractors were required to read and sign, was a critical document that supported us in the prevention of modern slavery and human trafficking. It also gave employees and suppliers the confidence and resources to report concerns where the interests of others may be at risk.

The policy outlined our commitments and expectations, as well as how to raise a concern and how we would review it, escalate and investigate it. We also included the policy in the on-boarding process for our suppliers to raise awareness of our expectations. While the policy could not cover every possible concern, it did provide examples of malpractice, including references to modern slavery and human trafficking.

We offered a confidential freephone whistleblowing hotline that operated 24 hours a day. The hotline was operated on behalf of CUKL by SeeHearSpeakUp, an external and independent organisation, to ensure that people could voice their concerns in confidence. We also complied with The Public Interest Disclosure Act 1998 (PIDA), which provides guidance on addressing whistleblowing issues in a safe and constructive manner and protects employees who may have wanted to raise concerns about malpractice.

Code of Conduct

With integrity underpinning our operation, our Code of Conduct was one way that we communicated and embedded our values, as well as the high standards of business conduct that we expected from all CUKL employees. It also linked to our Whistleblowing Policy and provided guidance for reporting any unethical behaviour or violations of the Code. All employees were required to read and sign our Code of Conduct policy, ensuring awareness and compliance internally.

Players

Our Players' Guide – which was accessible online, in store and in braille – outlined how National Lottery players could help to combat modern slavery and human trafficking. We encouraged them to contact us if they observed anything that may have been of concern.

Training

To ensure our employees understood the importance of preventing modern slavery and human trafficking within our business and the risks of not doing so, we prioritised raising awareness and building knowledge on these topics.

We ran an annual modern slavery training module, which all of our employees were required to complete and pass. As part of this training, they were also required to read and sign our Modern Slavery and Human Trafficking Statement.

Our internal intranet housed various information and resources, keeping our employees informed of our commitments. We included new content written by some of our employees that work specifically on preventing modern slavery and human trafficking within our retail estate.