

## GAMBLING LAW UPDATE

# Voluntary Code for Prize Competitions and Free Draws

This update summarises the provisions of the new [Voluntary Code](#) for prize competitions and free draws, published by DCMS on 20 November 2025. The Code supplements existing provisions.

The Code will apply to operators of prize draws where the player may either purchase a ticket or enter through a free entry route, if the operator chooses to sign up to the Code. Signatories to the Code are expected to implement it by 20 May 2026.

## **The key requirements of the Code are to:**

### *Age limits*

- › Implement a 'reasonable' age verification process to restrict entry to over 18s.
- › Target advertising at over 18s only.

### *Spend limits*

- › Only accept credit card payments up to £250 per month per player.
- › Do not accept credit card payments for instant win draws.
- › Set suitable and proportionate monthly spend limits for all players **or** provide facilities for players to set their own monthly spend limits, including an option to set this to £0.

### *Account suspension and closure*

- › Provide facilities for players to temporarily suspend their account for at least 6 months, or permanently close it.
- › Do not send marketing to suspended and closed accounts.

### *Responsible play and indicators of harm*

- › Use 'reasonable' efforts to have in place effective monitoring of players' activity, to identify harm or potential harm (see the [Code](#) for suggested indicators of harm).
- › Use a tailored and proportionate approach to intervention where indicators of harm are identified.
- › Signpost players to sources of support for those experiencing harm.

- › Ensure an 'appropriate' time period between the draw opening and closing.

### *Fairness and transparency*

- › Provide a clear summary of how the prize draw works, including a statement that prizes are 'awarded in accordance with the laws of chance'.
- › Provide details of the free entry option clearly and prominently before the point of purchase.
- › Ensure free and paid entries have an equal chance of winning.
- › Award prizes under the supervision of an independent person, or using a computer process that produces verifiable and auditable results, and publish details of this process.
- › Provide the winner with the advertised prize (or a reasonable cash alternative) promptly.
- › Provide an appropriate, transparent and robust complaints and dispute resolution processes.

### *Accountability*

- › Take 'reasonable steps' to ensure the Code is followed by third parties, such as affiliates and draw partners, through contractual arrangements and termination rights.
- › Publish details of the measures put in place to comply with the Code.

### *Advertising*

- › Comply with the provisions of the CAP and BCAP Codes and ensure advertising is socially responsible.

**If you would like further advice, please contact Melanie Ellis ([melanie.ellis@northridgelaw.com](mailto:melanie.ellis@northridgelaw.com)).**