

Guidance on advertising in-game purchases

Committee of Advertising Practice and Broadcast Committee of Advertising Practice consultation on new guidance to explain how the Advertising Codes apply to the marketing of in-game purchases in apps and video games

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1. Executive summary

The Committee of Advertising Practice (CAP), author of the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code) and the Broadcast Committee of Advertising Practice (BCAP), author of the UK Code of Broadcast Advertising (BCAP Code) are consulting on proposals to introduce new formal guidance on advertising in-game purchases.

CAP and BCAP understand that concerns have been raised by the public, the video game press, campaign and research organisations, and by Government Select Committees about elements of in-game purchasing. Although some of these concerns fall outside of the scope of advertising regulation, CAP and BCAP have identified three areas in which formal guidance may help to mitigate the potential harms identified by concerned parties. These areas are:

- Clarity of information at point of purchase
- Responsibility of advertising messages
- Truthfulness in advertising of games containing purchasing

Rather than implementing new rules, CAP and BCAP consider that the issues in question can be suitably addressed through specific formal guidance on existing rules.

Point of purchase

CAP and BCAP are concerned that a combination of factors that vary the value of in-game items may have a serious impact on the ability of consumers (particularly children or vulnerable people) to understand how much real-world money they are spending on in-game items. The proposed guidance will advise marketers on how they should present information to consumers in a way that will support their ability to determine how much items will really cost them.

Advertising messages

The nature of in-game purchases, especially random-item purchasing (often called 'loot boxes'), has the potential to cause harm, particularly to vulnerable consumers. Appropriate regulatory intervention on the part of vulnerable people for riskier product categories is a general principle well-established in the Codes. The proposed guidance seeks to do this by ensuring that messaging around the purchase of in-game items (especially random-item purchasing) reduces the risk of harm to vulnerable people.

Advertising games with in-game purchases

As well as marketing of in-game purchases, CAP and BCAP have concerns about the advertising of games that contain these mechanisms and whether it makes clear that some content featured in the ad may be subject to an additional cost. The proposed guidance offers advice on making clear that in-game purchasing is available, and how to ensure featuring purchased content in game ads is unlikely to mislead.

This consultation presents the proposed guidance for comment, with this document explaining the background to each section.

The consultation will close at 5pm on 28 January 2021. For more information on how to respond, please see section 7.

2. Introduction to UK advertising regulation

2.1 The Committee of Advertising Practice (CAP)

CAP is the self-regulatory body that creates, revises and enforces the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (the CAP Code). The CAP Code covers non-broadcast marketing communications, which include those placed in traditional and new media, promotional marketing, direct marketing communications and marketing communications on marketers' own websites. The marketer has primary responsibility for complying with the CAP Code and their ads must comply with it. Ads that are judged not to comply with the Code must be withdrawn or amended. Parties that do not comply with the CAP Code could be subject to adverse publicity, resulting from rulings by the Advertising Standards Authority (ASA), or further sanctions including the denial of media space.

CAP's members include organisations that represent advertising, promotional and direct marketing and media businesses. Through their membership of CAP member organisations, or through contractual agreements with media publishers and carriers, those organisations agree to comply with the Code so that marketing communications are legal, decent, honest and truthful, and consumer confidence is maintained.

By practising self-regulation, the marketing community ensures the integrity of advertising, promotions and direct marketing. The value of self-regulation as an alternative to statutory control is recognised in EC Directives, including Directive 2005/29/EC (on unfair business to consumer commercial practices). Self-regulation is accepted by the Department for Business, Energy and Industrial Strategy and the courts as a first line of control in protecting consumers and the industry.

Further information about CAP is available at www.cap.org.uk.

2.2 The Broadcast Committee of Advertising Practice (BCAP)

BCAP is the regulatory body responsible for maintaining the UK Code of Broadcast Advertising (the BCAP Code) under agreement with the Office of Communications (Ofcom). Ofcom has a statutory duty, under the Communications Act 2003, to maintain standards in TV and radio advertisements. In 2004, Ofcom entrusted BCAP and the broadcast arm of the ASA with the regulation of broadcast advertisements in recognition of CAP and the ASA's successful regulation of non-broadcast marketing for over 40 years, and in line with better regulation principles.

The BCAP Code regulates all advertisements on television channels and radio stations licensed by Ofcom and all advertisements on Sianel Pedwar Cymru (S4C) and S4C digital, including teleshopping channels and any additional television service (including television text services and interactive television services). The BCAP Code is enforced against Ofcom-licensed broadcasters, Sianel Pedwar Cymru (S4C) and S4C digital. Broadcasters are required by the terms of their Ofcom licence, and, for S4C, by statute, to adhere to the standards set out in the BCAP Code.

BCAP members include broadcasters and trade associations representing advertisers, broadcasters and agencies. BCAP must seek advice on proposed Code changes from an expert consumer panel, the Advertising Advisory Committee (AAC). Under Section 324 of the Communications Act 2003, BCAP must consult on proposed Code changes. BCAP strives to ensure that its rule-making is transparent, accountable, proportionate, consistent

and targeted where action is needed, in accordance with the Communications Act 2003. Ofcom must approve Code changes before BCAP implements them.

Further information about BCAP and the AAC is available at www.cap.org.uk.

2.3 The Advertising Standards Authority (ASA)

The ASA is the independent body responsible for administering the CAP and BCAP Codes and ensuring that the self-regulatory system works in the public interest. The Codes require that all advertising is legal, decent, honest and truthful.

The ASA assesses complaints from the public and industry. Decisions on investigated complaints are taken by the independent ASA Council. The ASA Council's rulings are published on the ASA's website and made available to the media. If the ASA Council upholds a complaint about an ad, it must be withdrawn or amended.

An Independent Review Procedure exists for interested parties who are dissatisfied with the outcome of a case. CAP conducts compliance, monitoring and research to help enforce the ASA Council's decisions. Information about the ASA is available at www.asa.org.uk.

2.4 Funding

The entire system is funded by a levy on the cost of advertising space, administered by the Advertising Standards Board of Finance (Asbof) and the Broadcast Advertising Standards Board of Finance (Basbof). Both finance boards operate independently of the ASA to ensure there is no question of funding affecting the ASA's decision-making.

Information about Asbof and Basbof is available at www.asbof.co.uk and www.basbof.co.uk.

3. Regulatory framework of the BCAP Code

3.1 Communications Act 2003

The [Communications Act 2003](#) (the Act) sets out provisions for the regulation of broadcasting and television and radio services, including provisions aimed at securing standards for broadcast advertisements. The most relevant standards objective to this consultation is:

[319\(2\)\(h\)](#) that the inclusion of advertising which may be misleading, harmful or offensive in television and radio services is prevented.

The Act requires Ofcom to set and, from time to time, review and revise, a Code containing standards for the content of broadcast advertisements carried by TV and radio services licensed under the Broadcasting Acts [1990](#) and [1996](#). Ofcom has contracted out the setting of advertising standards to BCAP under the [Contracting Out \(Functions Relating to Broadcast Advertising\) and Specification of Relevant Functions Order 2004](#). That function is exercised in consultation with and agreement of Ofcom.

4. Proposals

CAP and BCAP understand that concerns have been raised by the public, the video game press, campaign and research organisations, and by Government Select Committees about the potential for in-game purchasing, particularly of random-item products (often called 'loot boxes'), to cause harm and/or to mislead consumers. As discussed below, the majority of these concerns relate to the products themselves and are, therefore, in the jurisdiction of organisations other than the ASA/CAP/BCAP, such as the Competition and Markets Authority or the Gambling Commission. However, CAP and BCAP consider that some of the issues raised by concerned parties do involve marketing and that there is scope for regulatory action in the following areas:

- Clarity of information at point of purchase
- Responsibility of advertising messages
- Truthfulness in advertising of games containing purchasing

The Advertising Codes already contain prohibitions on harmful and misleading advertising, and on this occasion CAP and BCAP do not consider that further rules are necessary to address these specific issues in the interactive entertainment sector. Instead, they propose the publication of a formal piece of Advertising Guidance, which explains to advertisers how the existing Codes apply to this specific matter, i.e. what responsible and truthful marketing looks like for in-game purchasing.

The draft guidance is attached as an annex to this document.

5. Background

5.1 Definitions

In-game purchasing

Within modern video games and apps, it is common to be able to make purchases within the game, whether directly or through an external platform (such as Steam, Google Play, or Origin). These purchases may range from very small and low value, such as an item that boosts performance or skips waiting times, to relatively large and high value, such as an expansion pack or bundle of currency. For the avoidance of doubt, in-game/app storefronts that offer digital products for sale are within the scope of the CAP Code.

Proprietary and premium currency

It is very common for games to use a proprietary currency (with names such as credits, gems, or gold), with which the player can obtain additional game resources. For some games, this currency can only be earned within the game, and for others either the currency or (less commonly) the resources themselves can be purchased with real-world money. Games that use in-game purchasing frequently have two levels of proprietary currency. One, which can be earned with relative ease in-game, will be a basic currency that allows players to purchase ordinary game items or resources and play a somewhat limited version of the game. The 'premium' currency is more difficult to earn or, sometimes, not possible to earn at all through gameplay and only available to purchase with real money. This currency is then exchanged in-game for higher-value products, such as prestige cosmetic upgrades or more powerful items. It is common for small amounts of premium currency to be 'earned' through watching video ads.

Alongside these basic game economic mechanics, the premium currency may be used to purchase random-item products (see below). In some cases, it is the *only* way to buy these products. Where proprietary currency is required to purchase in-game items, it is usually in a separate part of the game storefront, meaning that players do not see the value of the currency next to the amount to be paid for an item.

Random-item purchases ('loot boxes')

Random-item purchases function similarly to a lucky dip – the player pays for a chance to open a virtual box, and receives a number of digital items with varying in-game values. Players know that they will receive a certain number of items, but not what they will be or how rare/valuable they are. Some items are less likely to be received and are considered 'rare', while others may be received frequently. It is common for random-item purchases to be bought with premium proprietary currency and sold in 'multipacks' of varying value. Some games show players what items are inside a random-item purchase, and some may show the odds of receiving various rarity levels.

Odd-pricing

In addition, both currency and loot boxes may be subject to 'odd-pricing' – this is where both purchases are only available in specific increments, which do not match up and therefore leave the player with too much or little proprietary currency. For example, you may only be able to buy currency in increments of 50, but each loot box might cost 30. For the player to redeem all of their currency with nothing left over, they would have to buy 150

credits and redeem for 5 loot boxes; it is not possible to buy a single box with the right amount of currency.

Moreover, many games 'bundle' currency and loot boxes, so the more you buy the more cost-effective they are. For instance, 50 credits might cost £5, but 500 credits could cost £40.

Cosmetic/functional items

Some digital items only affect the aesthetic of a character or scene within a game – such as costumes, signature voice lines, or different looking equipment. These are termed 'cosmetic' items and are often referred to as 'skins'. Although they do not affect gameplay, they may be valuable to players if they are known to be rare, limited edition, or if they hold significant aesthetic value to a player.

Other items give players an edge in gameplay – more powerful weapons, extra lives or chances to retry a puzzle, or extra resources for use in-game. These are functional items and hold value for the advantage or assistance they give a player. Games featuring these items, particularly when they are available to buy with real money, are sometimes referred to as 'pay to win' because the advantage given by the items can outweigh any particular skill.

Battle pass/season pass

Passes are virtual purchases that allow a player time-limited access to another aspect of game than just the standard version. For instance, the player might purchase access to a specific part of the gameworld, be entitled to take part in tournaments, or collect pass-specific items.

Downloadable content (DLC)

As well as the base game, video games may also feature expansion packs or DLC. These are significant extra parts that players can purchase and download, such as new characters, 'maps' (a new part of the gameworld), or even a whole new style to play in.

5.2 Activity by other regulatory organisations

Gambling Commission

One of the chief concerns raised over the last few years has been that random-item purchasing functions ('loot boxes') as a form of gambling. There have been calls for the Gambling Commission to intervene in this area, and the Commission therefore considered whether random-item purchasing fell within the legal definition of gambling (and thus within their scope), concluding that:

In practical terms... where in-game items obtained via loot boxes are confined for use within the game and cannot be cashed out it is unlikely to be caught as a licensable gambling activity.¹

¹ <https://www.gamblingcommission.gov.uk/news-action-and-statistics/News/loot-boxes-within-video-games>

In the same statement, the Commission noted that the public are not necessarily specifically concerned with whether these items are defined as gambling, but whether they have the potential to cause harm to children.

Not all random-item purchases are, however, confined to the game and unable to be cashed out. The Commission notes that these may be considered differently:

Where there are readily accessible opportunities to cash in or exchange those awarded in-game items for money or money's worth those elements of the game are likely to be considered licensable gambling activities.²

Purchases caught by gambling legislation in this way would be subject to the same regulation and enforcement as more common forms of gambling, including their marketing communications falling under the gambling rules of the CAP and BCAP Codes.

Department for Digital, Culture, Media and Sport

In June 2020, the Government responded to a report by the DCMS Select Committee, which called for further regulation of random-item purchasing as part of their report on Immersive and Addictive Technologies. One of the recommendations of this report was “to specify that loot boxes are a game of chance”³ covered by the Gambling Act 2005 (and therefore under the scope of the Gambling Commission). In response, the Government stated

[we] announced in the Queen's Speech in December 2019 our intention to carry out a review of the Gambling Act 2005, with a particular focus on tackling issues around loot boxes ... To support this review of the Gambling Act 2005 and our wider programme of research about video games, and to ensure government policy is based on a sound understanding of the issue and its place in the wider policy framework, the government will be launching a call for evidence on loot boxes ... The results from the call for evidence will be considered alongside the review of the Gambling Act 2005⁴

This call for evidence, aimed at players and at industry, launched in September 2020 and is intended to gather evidence and understand the impact of loot boxes. At the time of publishing this consultation, the call for evidence is still open.⁵

Other organisations, including the Royal Society for Public Health and the Children's Commissioner, have also raised concerns that are reflected in the above response.

The role of advertising regulation

The majority of concerns raised in relation to in-game purchasing concern the nature of random-item purchasing. As noted above, a primary issue is that these are often perceived to be so similar to 'game of chance' gambling as to prompt calls for their regulation under gambling legislation. However, the Gambling Commission's analysis has determined that

² <http://www.gamblingcommission.gov.uk/PDF/Virtual-currencies-eSports-and-social-casino-gaming.pdf>

³ <https://www.gov.uk/government/publications/government-response-to-the-digital-culture-media-sport-select-committee-report-on-immersive-and-addictive-technologies/government-response-to-the-digital-culture-media-sport-select-committee-report-on-immersive-and-addictive-technologies#loot-boxes-and-gambling>

⁴ *ibid*

⁵ <https://www.gov.uk/government/consultations/loot-boxes-in-video-games-call-for-evidence>

many types of random-item purchasing do not fall within this definition, and we understand that these are by far the most common types of purchase.

The question of whether these products should be defined as gambling and banned either from sale or advertising is a question of law, and falls outside of the scope of CAP and BCAP regulation. However, CAP and BCAP nonetheless recognise that there are matters closely related to this central issue that do concern advertising and which could be addressed as part of the wider regulatory framework:

- Clarity of information at point of purchase
- Responsibility of advertising messages
- Truthfulness in advertising of games containing purchasing

To this end, CAP and BCAP have considered the extent to which advertising in these areas could pose a risk of harm or other consumer detriment, and what regulatory action would be most appropriate to mitigate any such risks.

While many random-item purchases are not defined as gambling, and those are the subject of this consultation, any that are would be subject to the gambling rules in the CAP and BCAP Codes.

5.3 Concerns about the advertising of in-game purchasing

Proprietary currency, bundling, and ‘odd-pricing’

As noted above, in-game purchases may be required to be made with a proprietary currency and either or both of the currency or the item may be odd-priced and/or bundled.

When all these factors are combined, it may be challenging for a consumer to intuitively understand how much they are spending on an individual item. The varying levels of bundling and cost-effectiveness add an additional layer of challenge. The ASA’s previous work on broadband pricing⁶ found that, even where all the information required is included in the ad, consumers are not always willing or able to work out the overall price of a product when the terms are not straightforward. In some examples of in-game purchasing, a consumer must remember the cost of the currency and work out how much each credit was worth, multiply this by the number of credits for the bundle of items, and (where relevant) divide by the size of the bundle and type of items included. For random-item purchases, they must also factor in the probability that they receive an item that holds value for them.

In terms of consumer spending behaviour, a report commissioned by the European Parliament⁷ considered the academic research on and related to loot boxes and concluded that consumers were more likely to spend more money when using proprietary currency (such as casino chips) because it makes the transaction less tangible. Consumers are also likely to spend more money than they intended, but gain less overall value, when presented with bundles. These outcomes are indications that consumers may not be in a position to understand fully the amount of money they are spending.

CAP and BCAP are therefore concerned that the combination of proprietary currency, bundling, and odd-pricing may have a serious impact on the ability of consumers

⁶ <https://www.asa.org.uk/resource/Fixed-broadband-advertising-of-prices-report.html>

⁷ [https://www.europarl.europa.eu/RegData/etudes/STUD/2020/652727/IPOL_STU\(2020\)652727_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2020/652727/IPOL_STU(2020)652727_EN.pdf)

(particularly children or vulnerable people) to understand how much real-world money they are spending on in-game items. Under the Advertising Codes, where an ad quotes a price for a product, the inclusive price of the product (or how it is calculated) is material information to a consumer's transactional decision.⁸ Where the price is present but obscured (as explored above), CAP and BCAP consider that this is unlikely to be compliant with the requirements of the Codes.

The proposed guidance, therefore, explains that the real-world prices for in-game purchased products should be made clear to consumers in the storefront, considering the following:

- Whether proprietary currency is used
- How bundling affects price
- The relationship between the cost of currency and the cost of items, where odd-pricing is a relevant issue

Presentation of in-game purchasing

There is a variety of ways in which in-game purchases may be presented to consumers, both in and out of the game, with the following examples representing common approaches:

- Pop-up messages with offers of extra lives/boosters etc. when the player loses
- Pop-up messages offering items when certain game aspects are interacted with
- In-game storefronts, with or without offers
- Pages on the game's website announcing new items
- Links to purchase DLC/passes on the game's website/hosting platform/in-game
- Advertorial content from streamers

Within these messaging platforms there is also a range of approaches, from a neutral availability-only style (e.g. in an online storefront) to messaging relating to likelihood of success (e.g. "try one more time by purchasing this upgrade!") or social standing. Some of these messages may emphasise the functionality of the items, others may focus on the 'rarity' of particular skins and the exclusivity of owning them. With random-item purchasing, the ads may revolve around the chance of obtaining something particularly rare or useful.

While many of these approaches are unlikely to cause harm, CAP and BCAP are concerned that some types of messaging (particularly when in a time-dependent context) may have the potential to cause harm to some vulnerable individuals. Although there is only limited academic research on potential harms from random-item purchasing, one piece cited in the above European Parliament report has established a correlative link between problem gambling behaviour and random-item purchase spend:

in the Zendle and Cairns (2019) analysis, the average spending on loot boxes was 11.14 US dollars (approx. 10 Euro) for non-problem gamblers while it was 38.24 US dollars (approx. 34 Euro) for problem gamblers. However, the

⁸ 3.4

For marketing communications that quote prices for advertised products, material information [for the purposes of rule 3.3] includes:

3.4.3

the price of the advertised product, including taxes, or, if the nature of the product is such that the price cannot be calculated in advance, the manner in which the price is calculated

researchers are unable to establish whether loot box spending leads to problem gambling, or whether online game players with pre-existing gambling problems are especially attracted to spending money on loot boxes. They also acknowledge that their results have limited generalisability due to the nature of the used samples and call for more research to reach robust conclusions. Nevertheless, Zendle and the co-authors believe their results present a justification for regulating loot boxes, for example by restricting children's access to them.⁹

Regardless of the direction of this causality, there is a case to be made that there is potential for harm – either because the loot box spending is causing problematic gambling behaviours (which are themselves known to be harmful) or because loot box spending is an expression of those behaviours. In either instance, irresponsible advertising of loot boxes has the potential either to cause a quantifiable harm through association with problem gambling or to be preying on those who are susceptible to over-spending because of existing vulnerabilities.

The Advertising Codes already take a related approach to this when it comes to marketing products to children. Because of the vulnerability and susceptibility of children, ads targeted at them cannot include direct exhortations to purchase (or ask a parent to purchase). In other areas of the Codes, certain product categories (such as gambling and alcohol) have restrictions to ensure that marketing communications do not endorse or encourage potentially problematic uses of these products. While CAP and BCAP do not consider that there is a sufficient basis to suggest that such rules should apply to in-game purchases, appropriate regulatory intervention on the part of vulnerable people for riskier product categories is a general principle well-established in the Codes. The proposed guidance seeks to do this by ensuring that messaging around the purchase of in-game items (especially random-item purchasing) reduces the risk of harm to vulnerable people.

Advertising games with in-game purchasing

As well as marketing of in-game purchases, CAP and BCAP have concerns about the advertising of games that contain these mechanisms and whether it makes clear that some content featured in the ad may be subject to an additional cost (or large investment of game time). Although it is legitimate for advertisers to include optional extras as part of their marketing, there is a careful balance to be struck in terms of not implying that items requiring further purchase are included in the basic game. When it comes to game features that are available to purchase or 'unlock' through play, there is an additional need to ensure that marketing of these features does not give the impression that these items are available for free or easily or immediately obtained through ordinary play.

CAP and BCAP understand that, particularly in the case of games with a narrative or progressive structures that span several (or even dozens of) hours' play, advertisements for games may feature content that players will not encounter or be eligible to play within the early stages of gameplay. For instance, marketers may wish to feature part of the dénouement of a particular story or game series, much in the same way as a film trailer. The purpose of this guidance is not to prevent this form of advertising, but to ensure that the content of an ad is a reasonable presentation of what a consumer could expect to encounter in the course of ordinary gameplay. CAP and BCAP consider that content requiring purchase or a significant investment of 'grinding' time (i.e. repetitive play intended

⁹ PE 652.727 p22

to accrue resources rather than further the narrative or experience) should not be presented as easily obtainable through standard play. It is specifically not intended to prevent advertisements for games from featuring advanced levels or scenes.

6. Consultation question

Respondents are invited to comment on the draft Advertising Guidance; comments on the following are particularly welcomed:

- The degree to which respondents consider the guidance addresses concerns about advertising for in-game purchasing, including whether there are any other factors that should be included
- Whether any effect of the guidance would present a disproportionate impact on the video game industry or a specific part thereof

7. How to respond and next steps

CAP and BCAP are committed to considering all responses carefully and with an open mind. CAP and BCAP would particularly welcome responses from stakeholders with an interest or expertise in games, apps, and digital purchasing.

The following summarises the consultation process and subsequent stages of CAP's consideration of the proposed changes to the Code:

- the consultation will run for 12 weeks, closing at 5pm on 28 January 2021;
- CAP will consider each response carefully and evaluate all significant points explaining the reasons behind the decisions they make; and
- the evaluation will be published on the CAP website when the outcome of the consultation is announced.

How to respond

CAP and BCAP invite written comments and supporting information on the proposals contained in this document by 5pm on 28 January 2021.

Responses via email with attachments in Microsoft Word format are preferred to assist in their processing.

Please send responses to: AdPolicy@cap.org.uk

If you are unable to respond by email you may submit your response by post to: Regulatory Policy Team Committee of Advertising Practice, Castle House, 37-45 Paul Street, London EC2A 4LS

Confidentiality

CAP and BCAP considers that everyone who is interested in the consultation should see the consultation responses. In its evaluation document, CAP will publish all the relevant significant comments made by respondents and identify all non-confidential respondents. The evaluation and copies of original consultation responses will be published with the outcome of the consultation.


All comments will be treated as non-confidential unless you state that all or a specified part of your response is confidential and should not be disclosed. If you reply by email or fax, unless you include a specific statement to the contrary in your response, the presumption of non-confidentiality will override any confidentiality disclaimer generated by your organisation's IT system or included as a general statement on your fax cover sheet. If part of a response is confidential, please put that in a separate annex so that nonconfidential parts may be published with your identity. Confidential responses will be included in any statistical summary of numbers of comments received.

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