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Mr Tim Yeo MP
House of Commons
London SW1A 1AA

Dear Mr Yeo

New Gambling Bill

I am a self-employed society lottery advisor whose business is assisting charities and other societies to promote lotteries for their charitable purposes. I am also retained by accredited External Lottery Managers who are managing lotteries for charities under the Lotteries and Amusements Act 1976.

I am writing to you to voice my concerns about the new Gambling Bill. The draft Bill is currently before the joint committee chaired by John Greenway MP and has commenced the pre-legislative scrutiny procedure. I am most concerned that in its present form it will be detrimental to the the good causes with which I am associated.

In order to manage their lotteries legally, they are required to register with the Gaming Board; to observe legally binding limits on spending; to submit a return for every individual lottery; and above all, to prove that the funds raised are used for the purposes for which the society is formed.

What the Government proposes to do in the new Bill is to ignore the recommendations of the Gambling Review Body, the Gaming Board and the Lotteries Council and to permit commercial organisations to operate unregulated profit making lotteries (or prize draws) with no funds for good causes provided there is an *element of skill*. This level of skill can be derisory and the selection of winners is then, to all intents and purposes by means of a lottery.

For example, GM TV operates such a lottery now where questions are asked such as 'What is the currency of Australia – is it a dollar, rouble or franc?' Players purchase an entry by premium rate telephone call and since it is probable that all entrants will know the correct answer, the winners are entirely selected by lottery.

The organisers do not have to be registered. There is no public protection; no good cause and no accountability and at present the Gaming Board does not have the resources or legal authority to do anything about it. The original recommendations for the new law were that these unregulated lotteries should no longer be permitted.

However, this advice has been ignored. If the Government stands by the current draft which says that: "A scheme in which a degree of skill or knowledge is needed in order to secure a prize will not, therefore, be capable of being a lottery" there will be a proliferation of minimal

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skill schemes operated by shops, bookmakers and direct mail promoters all taking custom away from genuine, licensed, fundraising lotteries. I believe that these pseudo-lotteries will proliferate to the detriment of society lotteries under the proposed rules for prize competitions.

Worse, this would allow criminal elements to operate unregulated lotteries with impunity which is the complete opposite of everything the gaming laws are designed to prevent.

May I ask you to consider the above and look at the Draft Gambling Bill (Part 11) in this respect. I am also very personally concerned that the draft legislation contains a proposal whereby anyone involved with assisting in the promotion of a society lottery will, in fact, be viewed as an External Lottery Manager requiring them to be independently registered. This is a very radical change from the current status quo. Currently there is strict regulation of those involved with society lotteries in that criminal records checks apply to the individual Promoter of each lottery, and often for others within the charitable organisation. In addition each Director of an External Lottery Managing organisation also undergoes these strict checks before lotteries can be managed. The organisation itself is then registered as an External Lottery Manager – the fee levied by the DCMS via the Gaming Board for Great Britain is currently £14,600.

Currently therefore I am authorised by either a society or an External Lottery Manager to act on their behalf and have been operating in this way for the past 5 years. If I was to be treated as an External Lottery Manager *in my own right* and asked to pay this huge fee, I would have to withdraw and lose my self-employed income. This proposed legislation would also apply to every printer, every designer, every selling agent, every distributor, (please see Section 207 (2) of the draft Bill for more information). It would prove disastrous for many others in similar roles to myself. I would be only too happy to undergo any additional criminal records checks and would imagine that anyone working legally in the society lottery service-provider role would want to do this as well. But to be forced to register as a lottery *Manager* when one is simply providing a service and not in control of how the lottery is managed or promoted, is, in my view, a ridiculous and unnecessarily bureaucratic safeguard.

I would ask you therefore to take an interest in this draft Bill and take on board my concerns and those of others involved in lottery fundraising for good causes. Many thanks.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S Eden'. The signature is written in a cursive style with a large, sweeping initial 'S'.

Sylvia Eden