



83 Whitehouse Loan
Edinburgh EH9 1AT
Tel 0131 446 2300
Fax 0131 446 2339

Product Placement Consultation
5th Floor
Department of Culture, Media and Sport
Attn Mr. Gandy
2-4 Cockspur Street
London
SW1 5DH

5 January 2010

Dear Mr Gandy,

Consultation Response: Product Placement on Television

I am writing in response to the UK Government's consultation on Product Placement on Television.

As a beneficiary of a society lottery, we have received substantial unrestricted funding. Equally important, the lottery's capacity to report on our work through direct mail, press coverage and radio has increased awareness of our services and the work we do. We are able to solicit more direct supporters to the organisation and make more potential beneficiaries aware of the services we provide. Unfortunately, however, this awareness-raising function of the society lottery does not yet extend to television.

On pages 19, 20 and 26 of the Consultation on Product Placement on Television, the issue was raised whether gambling should be a restricted subject. As a beneficiary of a society lottery, we feel it is important to very carefully consider potential restrictions in regards to gambling. Whilst we are acutely aware that gambling, particularly excessive gambling, can have serious negative societal effects, we urge you to also consider the extremely positive impact that society lottery funding has had on supporting good causes across the UK.

This positive impact has been underlined by three motions adopted in Scottish Parliament on the occasion of reaching the milestones of donating £1 million, £2 and £3 million for charities in Scotland. These motions were widely supported across the political parties. The last motion, lodged in September 2009, reads in part:

****S3M-4846 Sarah Boyack: People's Postcode Lottery Raises Over £3.2 Million for Good Causes—That the Parliament congratulates People's Postcode Lottery on raising over £3.2 million for its charity partners since its launch in January 2008; notes that the five charity partners, which include CHILDREN 1ST, Maggie's, Missing People (in Scotland), Scottish Wildlife Trust and the recently created People's Postcode Trust, have all benefited from substantial financial support, which, in many cases, has allowed them to consolidate and build on their existing service***

We firmly believe that society lotteries should not be prohibited from engaging in product placement, and urge a positive outcome of this proposal, for three main reasons:

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Firstly, we know from experience that, by raising funds and awareness for charities, society lotteries can benefit the wider society. CHILDREN 1ST receives significant unrestricted support from a society lottery. This support contributes substantially to our 40 local and four national services across Scotland, services which support families under stress, protect children from harm and neglect, help them to recover from abuse, and promote children's rights and interests. In addition to the direct financial benefit, positive publicity can make a real difference by raising awareness of the important work we do supporting children, young people and families throughout Scotland.

Secondly, the People's Postcode Lottery has informed us of recent research conducted by the IVO (Addiction Research Institute) and CVO (Addiction Research Centre) in June 2008. Entitled 'The Relationship between Participation in Number Lotteries and Gambling Addiction in the Netherlands', the main finding of the study is that there was no relationship between participation in society lotteries and gambling addiction. Researchers investigated four number lotteries and found that such lotteries do not contribute towards the onset and persistence of gambling problems. The research was composed of five subsidiary studies, including:

- Literature study
- Study of former and current gambling addicts
- Survey among participants in number lotteries
- Secondary analyses of the population screening
- Online poll of a representative group of the Dutch population

We believe this research shows that a clear differentiation should be made between the operation and services delivered by society lotteries and other forms of mainstream gambling.

Finally, when considering this consultation with a view to allowing charity lotteries to engage in product placement advertising, it is prudent to remember that the UK National Lottery already de facto engage in product placement advertising. This is done through their thrice weekly televised lottery draw, the 'In It to Win It' programme and the National Lottery Xtra channel on Freeview covering charitable and good cause related projects amongst other activities. With this in mind, we request parity for society lotteries by allowing them to showcase their good causes in the same manner already established by the National Lottery.

We believe these current restrictions placed on society lotteries are unfair and place them at a significant disadvantage compared to their market competitors. This consultation represents an opportunity for the UK Government to ultimately create a level playing field for all lotteries in the UK.

Given this body of evidence, I therefore argue that the product placement of charity lotteries should not be excluded.

Sincerely



Anne Houston
Chief Executive
CHILDREN 1ST