

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

22nd December 2009

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, which has not only provided us with substantial unrestricted funding, but foremost it has increased the awareness of our services and work to such an extent that far more people either start directly supporting the organisation or are now using our services. This has been achieved by the lottery publishing and reporting on our work across DM, press and radio. However unfortunately not yet on television.

On pages 19, 20 and 26 of the consultation on Product Placement on TV we noted that the issue was raised whether gambling should be a restricted subject. As a beneficiary of society lottery we feel it is important to review gambling as a restricted subject carefully. Whilst we are aware of the negative societal impacts that come with hardcore gambling, I urge you to consider the positive impact that society lottery funding has had on supporting good causes across the UK.

This positive impact has been underlined by motions adopted in Parliament on the occasion of reaching the milestones of donating £2 million for charities. These motions were widely supported across the political parties. The last motion as follows:

2092 POSTCODE LOTTERY SUPPORTS CHARITIES

notes that the People's Postcode Lottery has raised over £2.2 million for charities in the north of England; further notes that funds raised by the organisation support a large number of local and regional charities involved in children's wellbeing, poverty relief, nature conservation, community development and missing people; further notes that the Yorkshire Dales Millennium Trust and the Yorkshire Wildlife Trust have been major beneficiaries; and wishes the People's Postcode Lottery, its players and charity partners every success for the future.

We firmly believe that society lotteries should not be prohibited from engaging in product placement for two reasons. First, we share the collective positive impact that society lotteries have had on our charity and the wider society. Increased awareness of our charity would undoubtedly help society and therefore we urge a positive outcome of this proposal. The support of the People's Postcode Lottery Trust has been invaluable to our work over the past year and have enabled us to make a difference to hundreds of families .

Secondly, recent research conducted by the IVO (Addiction Research Institute) and CVO (Addiction Research Centre) in June 2008 came to our attention. This is entitled 'The Relationship between Participation in Number Lotteries and Gambling Addiction in the Netherlands'. In particular, the study found that there was no relationship between participation in society lotteries and gambling addiction.

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

As stated previously, the main finding of this study was that of the four number lotteries investigated it was found that they do not contribute towards the onset and persistence of gambling problems. Therefore, it is clear from this that there must be a clear differentiation made between the operation and services delivered by society lotteries in comparison to all other forms of mainstream gambling.

When considering this consultation with a view to allowing charity lotteries to engage in product placement advertising, it is also 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, which covers charity and good cause related projects amongst other activities. With this in mind, we therefore ask for parity in the way in which society lotteries are treated so as to be able to showcase their good causes in the same manner already established by the National lottery.

We believe these current restrictions placed on charity lotteries with regards to 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 on television in the UK should not be prohibited but instead encouraged in the interest of the public awareness of our charitable work.

We feel that if product placement was allowed this would increase the public profile of charities across the UK even more and have a multiplier effect on fundraising efforts for them.

Sincerely



Matt Simpson
Project Manager



