

National Lottery Commission

Consultation on the use of gaming and betting themes on National Lottery Scratchcard games.

Response from the Methodist Church

- A** Is there any evidence, that the Commission should take account of, which suggests that the featuring of gaming or betting themes on National Lottery Scratchcards can lead to any player detriment, for example excessive play? Please cite research to support your views if possible.

The Methodist Church supports a cautious approach to regulation. We recommend that gaming and betting themes should only be permitted on Scratchcards if there is clear evidence that they do not lead to any player detriment. As far as we are aware, no such research has been undertaken.

- B** Should National Lottery Scratchcards be associated with or feature gaming or betting themes? Please explain the advantages or disadvantages as you see them.

No. In paragraph 4.2 the Commission highlights the generally positive public perception of the National Lottery. We are concerned that by using gaming or betting themes in National Lottery products, the lines between the National Lottery and other forms of gambling are become blurred. This would have a negative impact on the perception of the National Lottery. We would prefer the National Lottery to be clearly different and distinct from gambling, and prohibiting gaming and betting themes would help. We have wider concerns about the gradual normalisation of gambling within society. More people gambling will lead to more people having gambling problems.

- C** Has the Commission identified the most appropriate option for addressing the use of gaming or betting themes on National Lottery Scratchcards?

We would prefer to have a ban on the use of all gaming or betting themes on Scratchcards. The Commission's proposals set out in the table in paragraph 4.8 are the very upper limit of what might be permitted.

- D** Are the proposed exclusions appropriate, or can alternatives be suggested?

The proposals are appropriate; indeed we would wish to exclude all gaming or betting themes unless there is clear evidence that they do not lead to increased gambling.

E Do you have any other general or specific observations on the use of gaming or betting themes on National Lottery Scratchcards?

We do not have any further comment to make.

F Do you think the Commission should consult on the use of gaming themes in Interactive Instant Win Games in the future?

No. We support the current situation which prohibits the use of gaming or betting themes in Interactive Instant Win Games. We would like the relevant part of the Code of Practice for the Section 6 class licence for Interactive Instant Win Games to remain the same. We share the Commission's views set out in paragraph 3.5, in that gaming-themed Interactive Instant Win Games could easily resemble other on-line gambling products.

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