

Sportech PLC response

Please find below some observations in response to the NLC consultation on the use of gaming and betting themes on National Lottery Scratchcard games. I use the numbering in the consultation document.

Sportech PLC is licensed as an external lottery manager by the Gambling Commission. It has operated society lotteries for over ten years, both draw-based games and scratchcards.

5.1a) Sportech has occasionally used gaming themes on scratchcards, but not betting themes. We have no evidence that such cards lead to excessive play. Four factors, in our experience, determine the popularity of a card (and thereby risk of excessive play): a) its novelty - just by being recently released; b) its prize structure and perceived generosity; c) the mechanic - eg in certain channels bingo-style games succeed; and d) the good cause benefiting (I appreciate that other than with the Olympics Camelot can't hypothecate in this way). Noting the slot-machine themes of some of the cards in the appendix to the consultation document, what were Camelot's experiences with them in terms of player detriment?

5.1b) I suspect that the theme is generally of little importance to the playing public - they won't care either way. Matters of theme and perhaps also taste count more beyond that group - so with the media, politicians and other social classes. The NLC's sensitivity to this perception is stated at the second bullet of 3.1 of the consultation document. So what is the NLC's principal motive here? Is it concerned that these themes will cause a social problem ie excessive play, or is the concern more a presentational one ie continuing to hold the line with stakeholders that lottery isn't gambling? If the former, I consider that most, including the agencies addressing problem gambling, would believe the risk to be small. If the latter, the NLC is probably best placed to assess the risk.

5.1c) It seems a balanced option. It would presumably result in some of the appendix examples not now being acceptable.

5.1d) See 5.1c).

5.1e) Whilst understanding and supporting the need for a responsible approach to avoid the catastrophic impact of excessive play, the dangers in using such themes may be more perceived than actual, as noted at 5.1b).

5.1f) The support agencies have found that rapid-play online gaming poses more of a risk than other forms of gambling. That being the case, it is just as, if not more, important that consultation is undertaken on this activity.