



The Lotteries Council response to the Department for Digital, Culture, Media and Sport Consultation on the minimum age for playing National Lottery games

October 2019

1 About The Lotteries Council and the charity lottery sector

- 1.1 The Lotteries Council is the membership body which brings together over 400 members who either run charity lotteries or provide services to support the running of charity lotteries.
- 1.2 The Charity Lottery sector raised over £314 million for good causes in the year to September 2018 according to Gambling Commission statistics.
- 1.3 The latest Gambling Commission figures for the percentage return to good causes show that the Charity Lottery sector returned 44.7% to good causes in the year to September 2018.

2 The Lotteries Council view on the Department's consultation

- 2.1 *Q1. Do you think the minimum age for any National Lottery product should be changed?*
- No - the minimum age should remain at 16 for all National Lottery games
- 2.2 *Q2. Do you have any research or statistical evidence to suggest that there is a greater risk of harm from certain types of gambling (e.g. draw-based or instant win)?*
- No, but there is plenty of research, much of it referred to in the documents issued by the Department with the consultation, that there is little or no evidence of any harm caused by National Lottery games. To reiterate: "Evidence from the latest combined Health Survey showed that problem gambling rates for players of National Lottery draw-based games were 1.0%, while the figure for scratchcards was 1.8%...The problem gambling rates are based on survey data for all National Lottery players including those who participate in both the National Lottery and other gambling activities". Thus the actual figures for problem gambling caused by National Lottery games is lower still than these figures.
- From that same document, there is no evidence that there are significant numbers of people aged 16-18 playing lotteries and a ban, therefore, will have little impact. As stated in the consultation, any changes to the age limit for the National Lottery for consistency will apply to society lotteries. Therefore, as this consultation is focused on an operator which, at scale and operating regulations, differs significantly from our members, it is absolutely vital that these changes take a proportionate, evidence and risk-based approach to their consideration. The Lotteries Council encourages socially responsible play and will support measures which reduce harm but it is

essential that this is not undermined by decisions which have no factual grounding or incomplete sectoral consideration or are based on conjecture.

Further, it is the age limits alone that distinguish lottery products from other gambling products. Without such distinction, there is nothing to separate lotteries from any other type of gambling. Let it not be forgotten that the fundamental purpose of lotteries is to raise money for good causes.

2.3 *Q2. If the minimum age were to be increased, do you anticipate any transition costs?*
Not applicable

2.4 *Q4. If you have any further evidence or data you wish to submit for consideration, please provide it here:*
See our response to Q1 above.

The Lotteries Council
8 October 2019