



Advertising and Exemption Consultation  
Department for Culture, Media and Sport  
2-4 Cockspur Street  
London SW1Y 5DH

25<sup>th</sup> July 2012

*Dear Sir or Madam,*

I am writing further to the Department's Consultation on Exemptions to the Video Recordings Act and on Advertising in Cinemas.

The Holocaust Educational Trust is a charity, founded by Lord Janner of Braunstone and the late Lord Merlyn-Rees in 1988 during the passage of the War Crimes Act. Our mission is to educate every person from every background about the Holocaust and its lessons – we work with schools, colleges and communities across the UK to educate about the Holocaust and its contemporary relevance.

We deliver innovative educational and teacher training programmes, an Outreach programme for schools and colleges, and produce groundbreaking resources such as the BAFTA award-winning DVD-ROM, *'Recollections: Eyewitnesses remember the Holocaust'* and *'Thinking Film, Thinking History'* in partnership with Film Education, which helps teachers set modern films about the Holocaust in a historical and educational context.

Through our Government-funded *Lessons from Auschwitz* Project, we have given over 17,000 post-16 students the opportunity to visit the former Nazi concentration and death camp Auschwitz-Birkenau, as part of a carefully designed four-part course.

Our work ensures the Holocaust has a permanent place in our nation's collective memory and also plays a role in combating antisemitism, racism and prejudice in our society today.

We do not believe that it is appropriate for film material which contains explicitly antisemitic or racist content to be made available to children without restriction, regardless of whether that film is considered to be a documentary, of historical value or otherwise.

At present, it is our understanding that antisemitic and racist films, including the films of Nazi propagandists such as Leni Riefenstahl are available to purchase in the UK without age restriction. These files are

**BCM Box 7892, London WC1N 3XX**  
**T. 020 7222 6822 F. 020 7233 0161**  
**E. [info@het.org.uk](mailto:info@het.org.uk)**  
**[www.het.org.uk](http://www.het.org.uk)**

**Patrons**

Most Rev and Rt Hon  
Lord Carey of Clifton  
Lord Dholakia OBE DL  
Rt Hon Lord Mackay  
of Clashfern  
Lady Merlyn-Rees JP  
Prof Elie Wiesel

**Board of Trustees**

*President*  
R. Stephen Rubin OBE

*Honorary Vice President*  
Rt Hon Lord Hunt of Wirral MBE

*Chairman*  
Lord Janner of Braunstone QC

*Vice Chairman*  
Paul Phillips

*Treasurer*  
Paul Bertlyn

David Gryn  
Kitty Hart-Moxon OBE  
Ben Helfgott MBE  
Sir Ivan Lawrence QC  
Craig Leviton  
Ivan Lewis MP  
Jon Mendelsohn  
Martin Paisner CBE  
Alberta Strage

**Council**

James Clappison MP  
Louise Ellman MP  
Michael Karp  
Rt Hon Andrew Lansley CBE MP  
Sir Antony Sher KBE  
Stephen Twigg MP

**Chief Executive**  
Karen Pollock MBE

not presented with a educational context and we do not believe that allowing children to view such extreme prejudiced material without any accompanying background information is acceptable.

For example, editions of films available to see such as 'Triumph of the Will' (1934), a propaganda film that glorifies Adolf Hitler and the Nazi party, present the regime in a positive light without any form of context. Antisemitism and racism are positively portrayed without any reference to the murder of six million Jews in the Holocaust and the historical source of Nazi prejudice is not explored.

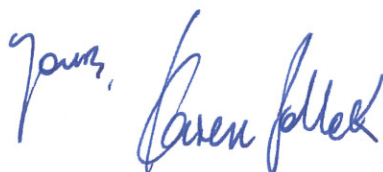
Viewing these films as historical primary sources may encourage critical thinking and be valuable in an educational setting, but without an adult-set context they may be harmful.

Such films are currently available to children of all ages as exempt from classification. We believe that a regulatory framework for films of this nature is necessary to ensure that children and young people do not have access to what can be highly offensive and potentially harmful material.

We therefore support a lowering in the threshold for exemption, in order that the British Board of Film Classification be made responsible for classifying all films which could be harmful to children and young people, including those which contain antisemitic, racist or otherwise discriminatory content.

If you would like any further information, please do not hesitate to contact me at [karen.pollock@het.org.uk](mailto:karen.pollock@het.org.uk) or on 0207 222 6822.

With best wishes,

A handwritten signature in blue ink that reads "Yours, Karen Pollock". The signature is written in a cursive style.

Karen Pollock MBE  
Chief Executive