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Quaker Action on Alcohol and Drugs

RESPONSE OF QUAKER ACTION ON ALCOHOL AND DRUGS TO THE CONSULTATION OF THE DEPARTMENT OF CULTURE MEDIA AND SPORT ON GAMING MACHINE REGULATIONS

Quaker Action on Alcohol and Drugs (QAAD) is an independent national charity concerned with the use and misuse of legal and illegal drugs. We also have a particular concern with gambling, and gave oral evidence to the Parliamentary Joint Select Committee on the Draft Gambling Bill. QAAD provides advice, information and education services within the Religious Society of Friends. Whilst we do not represent the Religious Society of Friends formally, our comments are rooted in our Quaker principles. Trustees also speak from professional or voluntary experience in the prevention or treatment of dependent behaviours.

We welcome the opportunity to respond to this consultation.

Question 1

We strongly agree that credit and debit cards should not be able to be used directly in any gaming machine.

Question 2

We agree that credit cards should not be used to purchase smart cards for gambling. We note, however, that debit cards do not remove the risk of gambling on credit, since pre-arranged over-draft limits are fairly common practice. We hope that this will be an area for monitoring/research as developments unfold.

Question 3

We agree that the maximum deposit limit be £20 for all categories of machine and £2 for Category D machines. The principle of a fresh decision for each transaction is an important one, and for most people £20 is still a significant amount of money.

Question 9

We agree with the proposals for display on all gaming machines. Information on the chances of winning are likely to increase the likelihood of responsible play, while the display of sources of help is vital for those whose problem gambling has escalated.

Questions 11 and 12

We agree that it is wise to be cautious as regards non-money prizes for high-value machines, and to wait until a UK evidence-base about Category A machines and problem gambling has emerged. We agree that prizes for Category D machines must meet the legal requirements for those under 18.

Proposals for committed and deposited money

The facility for rapid re-staking is one of the features associated with problem gambling, and deposited funds in any form seem likely to speed up the speed of play. We therefore have concerns about the suggested liberalisation of the current position, particularly as regards A and B2 machines, and would prefer to see lower limits. However, we do agree with the principle that separate player action should initiate each tranche of money, and that the maximum stake would need to be built up rather than reached in one transaction.

Question 23

We agree that all prizes should be offered directly to the winner and that a separate choice would need to be made to put the money into deposited funds.

Question 25

We agree that the number of player positions is the appropriate classification for a gaming machine, and that otherwise abuse of the limits of machine numbers allowed under the Act would be enabled. Gaming machines have many of the features associated with problem play, and we are already concerned about numbers and their impact on problem gambling rates.