



Quaker Action on Alcohol and Drugs

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## RESPONSE OF QUAKER ACTION ON ALCOHOL AND DRUGS TO THE CONSULTATION PROCESS OF THE GAMBLING COMMISSION ON LICENCE CONDITIONS AND CODES OF PRACTICE

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. We do not represent the Religious Society of Friends generally, but 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 participate in the consultation on Gambling Commission's consultation. Our response is directed at those aspects that have a particular bearing on children and problem gambling.

### **1. Protection of children and the vulnerable**

- We welcome the idea of a licence condition that requires gambling operators to demonstrate how they will contribute to research, prevention, education, and treatment in the field of problem gambling. We hope that this will lead to a significant increase in resources for the Responsibility in Gambling Trust, to the level that will enable it to deliver its functions fully and effectively. At present, resource issues are limiting this.
- We welcome the suggested terms of codes of practice aimed at preventing under-age play, particularly the use of identity cards. We agree that a physical presence rather than simply CCTV is necessary at entrances to certain premises.
- We are concerned at the risks of on-line gambling for children and recognise the practical difficulties involved in managing them. We believe, therefore, that the monitoring of the effectiveness of policies designed to prevent under-age gambling will be particularly important and support this measure. We hope that particular attention will be given to this issue in terms of resource/time allocation and research.
- We strongly support the GC setting time periods for cycles of play and the other measures suggested to reduce repetitive or problem play.

- We recommend that the information on responsible gambling provided by operators should include a brief check-list of signs of problem play (compiled with suitable expert advice).
- We are very concerned that problem gambling and intervention measures will not apply to Family Entertainment Centres in which children will play. We hope that this issue will be addressed separately in the criteria for Licensing Authorities' licensing policies.

## **2. Fair and open provision/technical standards**

- We hope that the approval procedures for new games will involve consultation with academic experts who have knowledge of problem gambling.

## **3. Marketing**

- We agree with the principles of advertising that the GC envisages. Our observation from the alcohol field is that codes have limited effect unless they are stringently and independently regulated. We are not absolutely clear what the mechanism will be for this, but hope the GC will have an active role.
- We agree that adherence to the code should be a licensing condition.
- We support the inclusion of educational messages in advertising.
- We strongly support the prohibition of alcohol as an incentive.
- Whilst there are some grey areas, we believe there is a distinction to be drawn between 'ordinary marketing' and inducements that encourage people to play more, or more quickly, than they would do if they were not so induced. This has obvious dangers in terms of encouraging patterns of repetitive play. We believe that codes should forbid inducements that offer cut-price play; concessions for playing in 'bulk' (6 plays for the price of 5, for example); or time-limited offers (the gambling equivalent of 'happy hour').
- We believe it would be helpful for operators to track the impact of inducements with particular reference to problem gambling.
- We agree with the GC's general approach to intervention. In view of the lack of evidence in this area, we hope that monitoring, evaluation and research will be conducted to assess their effectiveness (including qualitative information about the sensitive matter of third parties.)
- We have major reservations about gambling on credit and the use of credit cards in those areas where this will be allowed. We welcome the safety measures that are being suggested, but hope that this matter will be kept under review in relation to the issue of problem gambling.

We wish the Gambling Commission well in all its work.