



Quaker Action on Alcohol and Drugs

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RESPONSE TO THE GAMBLING COMMISSION CONSULTATION ON MACHINE STANDARDS CATEGORY C AND D: GAME LINKS AND SPEED OF PLAY

Question 1 Do you agree with the proposed revised speed of play for Category C and D (complex) machines, and if not why not?

As indicated in earlier consultation responses, we regret that the stakes and prizes for these categories of machines are to be raised. However, we strongly support the Gambling Commission's general approach to maintaining the monetary distinctions of the current classification system. Given the greater accessibility of Category C machines, this is extremely important in terms of problem gambling. We welcome the fact that the revised speed of play guidelines will help ensure that potential losses on Category C machines do not creep up to those of Category B machines.

However, we do have broader concerns about all forms of slot machines in relation to problem play, even about those with lower stakes and prizes and a restricted level of pay-out/loss. Limiting these factors does lower financial risks, but the secondary reinforcers of lights/noise/near misses and the various other game features that keep a player engaged also have a role in problem play, particularly as regards time spent/preoccupation/disassociation (rather than simply money).

As regards the speed of play, it is generally accepted from animal studies in the field of psychology that the power of reinforcement is related to speed, with small time intervals having a significant effect¹. We note that in Griffith's recent desk research for the Gambling Commission² that Livingstone and Woolley (2008) propose a 5 second minimum speed, though it is not clear whether this relates only to higher stake/prize machines. Ideally we would like to see the adoption of the 'measures likely to reduce the potential for excessive gambling' (outlined at the end of paragraph 8.2. of the Griffiths report).

We agree that the proposed speeds of play (of a 1.5 second limit for one spin and the 2.5 second average over an hour) provide a consistent structure within the parameters of the machine classification system. However, for the reasons outlined above we

¹ See Professor Grey's summary of evidence to the Budd Report 'the rate of response falls off steeply with increasing delay. Even short delays (0.5 seconds) have a marked result'.

² Griffiths, M, (2008) Impact of high-stake, high-prize gaming machines on problem gambling

believe it is important for more assessment/research of the relative roles of risk factors of EGMs generally, including C and D machines, since the risks of problem gambling are not solely related to stake/prize size. (We have particular concerns about vulnerable populations such as those suffering from Attention Deficit Hyperactivity Disorder, who may be more strongly affected by reinforcement schedules³).

We further note the points made in Griffith's desk study (paragraphs 8.8 – 8.13), particularly that much more data and research is needed on EGMs in real gambling situations in order to understand the relative roles of risk factors, and the effectiveness of safety features. We would like to see the Gambling Commission being proactive in liaising with the industry to make such data available in the various ways that Griffiths suggests.

As regards Category D machines, we note consistent findings of higher rates of problem play among minors than adults (Moodie, 2005⁴; Fisher, 1999⁵). If minors are still to have access to these machines, we believe reinforcement schedules should be slower than machines for adults. We would like to see a precautionary approach and a speed of 5 seconds as the minimum. Research on the elements involved in problematic play for children is vital.

Question 2

Do you agree with the proposed revised number of permitted game links after a win on Category C machines, or if not why not?

We appreciate the approach of the Gambling Commission in limiting the potential for game links to circumvent the prize categories, and generally agree with these proposals. We would suggest, however, that links to machines with prizes of £10 or less should be set at a level consistent with the proposed framework.

³ Johansen, Killeen and Sagvolden, 2007, for example.

⁴ Moodie, Crawford, Finnegan, F. 2006 Prevalence and correlates of youth gambling in Scotland *Addiction Research and Theory*, 14 (4) 365-385(21)

⁵ Fisher, S. (1999) A Prevalence Study of Gambling and Problem Gambling in British Adolescents *Addiction Research* 7(6) 509-538