



Quaker Action on Alcohol and Drugs

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RESPONSE TO THE CONSULTATION OF THE DEPARTMENT OF MEDIA AND SPORT ON VARIATION OF MONETARY LIMITS FOR GAMING MACHINES

Quaker Action on Alcohol and Drugs (QAAD) is a listed group of the Religious Society of Friends (Quakers). QAAD is an independent national charity that has a concern with the use and misuse of all drugs, and with gambling. QAAD offers prevention and information services for Quakers and contributes to public debates and consultations on matters relating to our concern and experience. Trustees give their time to QAAD freely, and bring voluntary and statutory experience from settings that include prevention, treatment, medical services and criminal justice. QAAD does not represent the Religious Society of Friends as a whole, but the views we express are grounded in our Quaker principles. QAAD was one of the faith-based bodies that gave evidence to the Joint Parliamentary Committee at the time of the Gambling Act, and has continued to contribute to the various considerations involved in implementation.

Question 1: Do you consider that the Government's proposals for adjustments to stake and prize limits on Category C machines to 60p/£60 respectively will provide the necessary level of relief to seaside arcades, pubs and other venues that are set to benefit, and to machine manufacturers and suppliers?

We do not have the knowledge to assess the level of relief to the industry that these measures would provide, but would like to comment on the increased potential for problem gambling.

The proposed increase in the prize is nearly double the existing figure - and well above what would be indicated by previous inflation or that which is likely before the next review. £60 is a significant sum to most people, and even more so to those on low incomes, among whom rates of problem gambling tend to be higher.

We reiterate our concern that such a significant increase in the prize should occur so soon. We are further concerned that the 'wider policy goals' of assisting seaside and pub operators are being given precedence over the precautionary principle. This is worrying both in terms of principle and practice as regards the aims of the Act.

The relatively high rates of problem gambling on electronic gaming machines are well attested in research literature (Fisher and Griffiths, 1995¹) problems tend to develop more quickly than with other forms of gambling (Breen, 2004²); and international evidence suggests that a high proportion of revenues from slot machines come from problem gamblers (for example, Williams and Wood, 2004³). The risks gaming machines pose is a composite of speed of play and re-play, stimulating signals whilst play occurs, availability/access, and prize and stake size - which all inter-relate with psychosocial risk factors. Whilst the results of altering any single element are difficult to predict, this proposal increases some of the risk factors without reducing any of them. We note that the Gambling Commission draw attention to the speed of play, but find nothing in these proposals that would reduce it.

As regards availability, the provisions of the Gambling Act have already resulted in a substantial increase in the number of gaming machines over the past few years, and the impact of this has yet to feed through and be assessed. The proposed increase in prize is of particular concern given that Category C machines are the most widely available gaming machine in the UK: the Gambling Commission 2007/8 report indicates that the number is approximately half of the national total (roughly 131,000 of 261,000).

A significant proportion of these machines are in non-gambling venues in alcohol-licensed premises. GC figures indicate that a quarter of all gaming machines are in pubs, which are only entitled to Category C and D machines.

An important principle of the Gambling Act was to reduce ambient gambling, and for gambling to take place in premises designated for that purpose. For gaming machines to remain in pubs was always an anomaly, given the risks of EGMs and the co-morbidity between alcohol and gambling problems (Welte et al., 2001⁴; Maccallam and Blaszczynski, 2003⁵). To increase the prize to a point where a win is significant for most people erodes the rationale that this is a softer form of gambling that can be made widely available at low risk.

We do not have information on the numbers of pubs that have applied for a licence for more than the statutory two machines. However, we are concerned that the increased profitability that is the purpose of the proposed measure may provide a stimulus for further proliferation, as well as increasing the risk of the existing machine stock.

The discussion document makes the point that the higher prize and stake may prevent people seeking 'harder' forms of gambling in other venues. No evidence is adduced in support of this, and we know of none. As a practical argument it is logically flawed in relation to pub patrons, since the primary purpose of these premises is not gambling - and the proposal simply makes a more serious form of gambling more widely available.

¹ Fisher, S and Griffiths, M. (1995) 'Current trends in Slot machine Gambling: Research and policy issues' *Journal of Gambling Studies* 11,3

² Breen, R.B. ((2004) Rapid Onset of Pathological Problems in Machine Gamblers: A Replication. *International Journal of Mental Health and Addiction* 2 (1)

³ Williams, R. and Wood, R. (2004) *The Demographic Sources of Ontario Gaming Revenue* Ontario Problem Gambling Research Centre

⁴ Welte, J., Barnes, G. Wiczorek, W. Tidwell, M-C, Parker, J (2001) Alcohol and Gambling Pathology among U.S adults *Journal of Studies on Alcohol* Vol 62, 5

⁵ Maccallam, F, Blaszczynski, A. (2003) Pathological Gambling and Co-morbid substance misuse. *Australian and New Zealand Journal of Psychiatry*, 36;3

As regards FECs (which account for a further quarter of the total number of machines) we feel that it is entirely suitable for family based premises to keep to the lowest possible level of risk for adult machine gamblers. For customers of AGCs (which contain 22% of EGMs) the argument does not stand at all, because patrons already have access to higher stake/prize machines on these premises.

We of course welcome the fact that calls for even higher increases are not being acted upon. However, we remain concerned that the risks as regards problem gambling have not been the paramount consideration, when the changes brought about by the Act have yet to be assessed. If the proposed change occurs, we would like to see monitoring and research of its impact.

We welcome the fact that the proposed stake does not involve the substantial increases that have been proposed. However, we would prefer it to remain at 50p and think that practically further play is likely to be encouraged by the 'banking' of the residue from a £1 coin.

Question 2: Do you consider that the Government's proposals for adjustments to stake and prize limits on Category C machines to 60p/£60 respectively will provide greater benefits when considered against the alternative option of 50p/£50?

We would find the lower level of 50p/£50 preferable in the sense that it is lower risk. However, for the reasons adduced above we would prefer to see no change, or one proportionate to inflation only.

Question 3: Do you consider that the Government's proposals for adjustments to stake and prize limits on Category D machines, and for prize gaming, will provide the necessary level of relief to seaside arcades, pubs and other venues that are set to benefit, and to machine manufacturers and suppliers?

We have strong concerns about children's access to Category D machines, but very much welcome the fact that no increases in stakes or prizes are being proposed. We also welcome that Ministers are concerned that fruit-machine style games with non-cash prizes should not be developed.

We agree that 'crane-grabbing' machines are of a different order and should be treated differently.

We find the parity between Category C machines and prize gaming reasonable in principle. However, this situation illustrates the 'inflationary' effect that changes in one area can have in another, and we are concerned at the general effect of 'arguing up'.

Finally, we hope that the research efforts of the DCMS, Gambling Commission and RIGT will be co-ordinated to enable an understanding of the policy levers that would need to be pressed in the event of an increase in problem gambling. The raised profile and availability of gambling in pubs (through poker, for example) combined with the proposed change in Category C machine prize is an area we believe should be studied, in view of the risk factors of ambiency and alcohol.

We appreciate the opportunity to contribute to this consultation.