



Quaker Action on Alcohol and Drugs

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## RESPONSE OF QUAKER ACTION ON ALCOHOL AND DRUGS TO THE CONSULTATION OF THE DEPARTMENT OF CULTURE MEDIA AND SPORT ON THE PROPOSALS FOR CASINO CONSULTATIONS

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. We have confined our responses to those questions that have a connection with problem gambling and social responsibility.

### 1. Principles underpinning the proposals

1.1. We agree generally with the underlying principles. We believe it would be helpful for the final one to include the discretion of licensing authorities to minimise any potential problems arising from the licensing of the new casino, as well as to maximise benefits.

### Questions 4, 5, 6 and 8

We believe it is fair and important for applicants for licences to be clearly advised what minimum requirements will be (at Stage 1) and what will be deciding criteria (at Stage 2). We note that the protection of children and 'vulnerable people' is included at both Stages of the process, and concur with the suggestion that abiding by the terms of mandatory and default licence conditions should be a basic Stage 1 requirement.

However, we also believe it would be helpful for a **proactive** approach to social responsibility and the protection of children/'vulnerable people' to be spelled out explicitly as a second stage criterion. This would be likely to stimulate competition and creativity by potential providers, and help social responsibility to move from a compliance framework to one where initiative is encouraged. Whilst we accept the premise that Local Authorities are best placed to determine local needs and responses,

we believe that this is a general principle – and therefore that it be included in national guidelines.

The terms of the Casino Advisory Panel, whilst they included social responsibility to some degree, gave a stronger emphasis to predicted regeneration and employment. We acknowledge the argument for continuity, but it is also the case that this is a new phase of the development process - and one that permits of re-appraisal by both licensing authorities and potential providers. Indeed, there is little point in advertising for more applicants if this is not the case. In our view, the over-riding criterion should be social responsibility and minimisation of the risks of problem gambling. We believe, therefore, that Local Authorities should be free to prioritise social responsibility in their selection criteria.

Location of a casino is an important element as regards the risks of problem gambling, with those that enable casual gambling associated with higher rates of problems than destination sites. Whilst this does not compromise the principle that proposals relating to other sites are possible, we believe licensing authorities should be able to outline this in their tendering process as a local criterion that will be a significant factor in their decision.

### **Question 9**

We strongly agree that licensing authorities should be encouraged to engage in active consultation with local people when developing their Stage 2 criteria. We believe the guidelines should 'require' (rather than simply 'encourage') such consultation (2.2. page 13).

### **Question 10**

Part 8 of the Code of Practice is relevant, but the parallels between normal premises applications under the Act and the casino tendering process are not exact. In particular, members of the public would not be classed as interested parties, and thus would not have the same right of appeal as bidders. In that sense, the licensing authority has two roles: eliciting local opinion, and representing the public interest through its decision. We have noted examples of best practice in some licensing authorities, where responses to public consultations on licensing policies have been published in a format that clearly separates this process from its own subsequent deliberations and decisions. We believe this should occur as regards casino applications, so that the way the licensing authority has discharged its different roles is transparent to the public.

We agree that bidders have a right to expect a fair, open and well-considered decision-making process. However, we hope that there will be mechanisms to prevent burdensome appeal costs falling on Local Authorities, which would divert resources from other services.

We are glad to have had the opportunity to respond to this consultation.