

WRITTEN EVIDENCE TO THE CULTURE, MEDIA AND SPORT SELECT COMMITTEE REGARDING GOVERNMENT PROPOSALS FOR GAMBLING

1. Summary

- 1.1. This submission is made on behalf of QAAD - Quaker Action on Alcohol and Drugs.
- 1.2. We welcome the concept of social responsibility in the industry and the moves that have already been made to achieve it.
- 1.3. We have some concerns about the social impact of government proposals, particularly on children, vulnerable people, and those who experience problems with gambling.
- 1.4. We have particular and specific concerns about:
 - (a) the fact that certain slot machines are being categorised as acceptable for children's use
 - (b) the fact that this approach is not evidence-based and presents a poor model for the development of social responsibility in the gambling industry
 - (c) the apparent plans to increase opportunities for drinking alcohol and gambling
 - (d) the specific proposals to allow the ordering of alcohol on the gaming floor of casinos
 - (e) the proposed increase in ambient gambling and its effect on vulnerable groups
 - (f) the lack of provision and appropriate planning/allocation of resources for problem gamblers
 - (g) the proposal to act on important "interim measures" in advance of the legislative process

2. Introduction

2.1. Quaker Action on Alcohol and Drugs (QAAD) is a listed group of the Religious Society of Friends - Quakers. We are an independent national charity concerned with the use and misuse of legal and illegal drugs, and we also have a particular concern with gambling. We offer information services within the Religious Society of Friends and aim to support organisations with similar aims and objectives. Trustees give their time to QAAD voluntarily. All have professional or voluntary experience in the fields of the prevention or treatment of dependent behaviours.

2.2. Quakers have a long-standing testimony against gambling, because we believe that it involves unfair gain without effort, it fosters the idea that happiness is gained through material possession, and because the profits of gambling are acquired at the expense of others' loss. We endeavour to "Resist the desire to acquire possessions or income through unethical investment, speculation or games of chance." (Quaker Faith and Practice, 1.02.39) Quakers also testify for moderation or abstinence from those behaviours that can cause addiction.

2.3. As Quakers we hold these principles about gambling, but we would not wish to impose these personal choices on others. However, we are concerned that some of the proposed changes will fail to give sufficient protection to vulnerable groups or to minimise problem play. We make this submission, therefore, mainly under the fourth term of reference of the committee – "the social impact of the changes proposed and safeguarding of the young and otherwise vulnerable".

3. Social Responsibility

3.1. We welcome the idea of social responsibility in the gambling industry and the moves that have already been made towards it. We believe that at this formative stage, the concept of social responsibility needs to be clearly outlined and modelled, both within legislation and policy. The philosophy and terms of reference that are developed now will largely determine the operation of

the Gambling Commission and the Gambling Trust – and therefore of the industry as a whole. It is vital, therefore, that the protection of the young and vulnerable is conceived clearly and not fudged. In our view, there are three significant ways in which the evidence-base relating to problematic gambling has been insufficiently incorporated into government proposals. These relate to children and gaming machines; alcohol and gambling; and ambient gambling and vulnerable groups.

4. Children and gaming machines

4.1. There is ample evidence of the propensity of gaming machines to cause problem play, particularly amongst children and young people. Professor Gray's evidence to the Budd Review explained the dependency-promoting features of slot machines and the theoretical basis for them. He notes that certain factors "reinforce" gambling and increase the chances of re-play and problem play. The reinforcers for slot machines include a short interval between bet and result, immediate opportunities for replay, visible "near misses", and stimulating noises/lights during play. Thus, the monetary prize is only one reinforcer amongst several. Professor Gray states:

"...the mode of delivery of a reinforcer is of much greater importance in determining its power as a reinforcer than its intrinsic nature... The razzamatazz of the fruit machine is a brilliant piece of behavioural engineering for this purpose... The size and quality of the reinforcer (a bigger or better piece of food, say) is of much less importance than these design features in determining the vigour and persistence of the reinforced behaviour..." (Professor Jeffrey Gray's evidence, Annex G of The Budd Review, pp 231-232).

4.2. Field research bears out the theoretical approach: slot machines are one of the major causes of problem play, and studies have shown that this general finding is also true for children (Fisher, 1998; Gamcare information). Research further shows that children have proportionately higher levels of problem play with gambling generally than do adults - at 5% or 6% as opposed to 2% to 3% (Fisher, 1993; Griffiths, 1995). Studies have also shown that the earliness of gambling onset is related to later problem use (Ide-smith and Lea, 1998; Fisher, 1993; Sinters, Stinchfield and Fulkerson, 1993).

4.3. The government proposals in "A Safe Bet for Success" suggest separating low-stake/low prize machines from other gaming machines into a new and distinct category. These machines would be termed Amusement Without Prizes (AWP) – though a £5 prize is winnable – and children would be allowed to play them. The separation of AWP's from other gaming machines has no validity in theoretical terms, since low prizes only modify one "reinforcer". The conjunction of all other dependency-promoting features is left intact. There is no theoretical basis or practical study evidence to support the supposition that lower prizes will reduce the problem potential of these machines for children (particularly since £5 is not an insignificant sum to a child.) On the contrary, the information so far runs quite counter to this supposition. To place AWP's in a category separate from other gaming machines is to make an artificial distinction that has no justification in evidence. We feel extremely concerned that this strong body of research is thus set aside by government proposals. QAAD would like to see an evidence-based approach to policy. If children are to be safeguarded effectively, this means that they should not have access to any slot machines.

4.4. We appreciate that such a measure may have economic consequences for some involved in the gaming industry, and at worst it might cause hardship for people whose livelihoods depend on small businesses of this nature. These matters have to be considered with respect and care, as the

terms of the Select Committee reflect. However, it is important that these considerations are conceived separately from the evidence-base regarding protection of the young and vulnerable, and not confused with it. We believe, therefore, that if immediate prevention of child access does not occur, it would be healthier to acknowledge that evidence is not yet being acted upon, and to make plans made for this to happen in the future. (Effectively, this was the approach of The Budd Review in proposing that the issue be revisited in five years - which gave the industry notice that further protection for children was likely, and gave it time to prepare.)

4.5. The government's present proposals for AWP's represent an unhelpful paradigm if the idea of social responsibility is genuinely to be incorporated into the gambling industry. In creating a non evidence-based distinction between AWP's and other gaming machines, and in sanctioning such machines for children's use, it gives out an unjustified message of safety and acceptability to the community at large. In acting inconsistently with theory and evidence, it sets a low and incoherent standard of social responsibility for the Gambling Commission to follow.

4.6. There are some other proposals in "A Safe Bet for Success" that also concern us as regards the protection of children. The Budd Review remarked, "*We are persuaded by the weight of evidence that children and young people are especially vulnerable to the risks of becoming problem gamblers. This has led us to make recommendations that would reduce their opportunities to gamble or to see others gambling.*"(p 90) The government appears to endorse this stance by stating that, "*Gaming machines and children should not mix*" (section 4.16, page 16). However, some proposals increase the amount of ambient gambling to which children would be exposed. The liberal arrangements for the siting of AWP machines is one example of this.

4.7. The ambient gambling to which children are exposed is also likely to be increased by "family entertainment centres" and increased gambling in licensed venues such as pubs. It is not entirely clear how these settings would work, but it seems that children would be allowed on these premises, and that there would be separate areas for adult gambling. It is hard to see exactly how this would work in practice (whether by visual screening or physical barriers), but in general, children would undoubtedly become directly aware of adult gambling activity – and therefore influenced by it. Research also indicates that the children of problem gamblers are already more likely to develop problems themselves – and such arrangements would tend to increase this risk. Arrangements to prevent the access of teenagers would also be difficult to organise effectively, since under-age drinking is already an issue. Effective monitoring of such a system would therefore require the allocation of long-term resources rather than sporadic "spot-checks". Though screening might afford some protection, arrangements such as these effectively increase ambient gambling both for children and adults.

4.8. In the light of all these factors, we recommend that:

- Slot machines are all classified into a single, four category system, with the fourth category consisting of those classed as AWP's under existing proposals
- That none of these be available to children
- Failing that, that plans are made to stop children's access within a specified period of time
- "Ambient gambling" is not increased, and particularly that no slot machines are sited in non-gambling premises, or those to which children have access

- Before there is a large expansion in gambling in particular areas (e.g. Blackpool) resources are allocated to pilot and to research effective education campaigns for children and young people. (Learning from Dutch educational approaches would be relevant here)

5. Alcohol and gambling

5.1. The Budd Review accepted evidence that alcohol increases problem play, and that heavy alcohol use is associated with increased gambling spending and multiple gambling problems (evidence cited on p 90 of the Budd Review). There is some research evidence to show that even low levels of alcohol intake adversely affect self-control in gambling (Kyngdon et al., *Addiction* 94 (5): 697-707, 1999). The Budd Review concluded that, “*the opportunities to mix gambling and alcohol should not be increased.*”

5.2. Several government proposals do not act on this recommendation and the evidence-base that underlies it. The idea of “family centres” and increased gambling in pubs represents one such suggestion. Of more immediate concern is the recommendation that alcohol be allowed on the gaming floor of casinos. Casino playing is one of the higher risk forms of gambling. Leaving the floor to purchase drinks is a safety measure because (i) it is likely to slow the rate of alcohol consumption, and therefore allow better risk assessment (ii) it allows greater opportunities to minimise problem play by physical and emotional distancing (“reality checks”) and (iii) it reduces the speed of gambling event frequency. We are particularly concerned that the allowing of alcohol on the gaming floor will not require a change in legislation, and may be activated quickly without Parliamentary debate.

5.3. We recommend that:

- the principle suggested by the Budd Review be adopted (that is, that there be no increase in opportunities to drink alcohol and gamble)
- the current prevention of the drinking of alcohol on the gaming floor continues
- the possession of a licence to sell alcohol does not lead to the entitlement to provide gambling services (e.g. AWP machines; Category C gaming machines in restricted areas)
- the idea of “premises within premises” for gambling on licensed grounds is spelled out more clearly and does not proceed except in accordance with these principles
- lottery terminals are not sited on licensed premises

6. Vulnerable people and “ambient gambling”

6.1. There is a considerable research base that suggests that those experiencing personal and social disadvantage are particularly vulnerable to problem gambling. Those who show other risk behaviours (e.g. illicit drug use, drinking, smoking, low school grades and delinquency) are particularly likely to gamble, and to gamble problematically (Proimos et al, *Pediatrics* 102(2): E231-E236, 1998; Ladouceur et al., *Journal of Child and Adolescent Substance Abuse* 8 (4): 55-68, 1999). Studies also show that those suffering from mental health difficulties are vulnerable (Black et al., *Psychiatric Services* 49 (11): 1434-1439, 1998). Those suffering from other forms of social deprivation/exclusion are vulnerable, and there is some evidence that genetic or family factors predispose individuals to problem play, and one such study concluded that, “*The increasing access to legalized gambling is likely to result in a higher prevalence of pathological gambling behaviour*”

among individuals who are more vulnerable because of familial factors.” (Eisen et al, *Addiction* 93(9): 1375-1384, 1998).

6.2. The Budd Review accepted that an increase in “ambient gambling” – widespread opportunities for gambling - would be likely to increase the incidence of problem play. It stated, “*The little evidence we have indicates that the rate of problem gambling tends to vary with the type of gambling opportunities available and their proliferation, rather than with the percentage of the population who participate in gambling*” (p 93).

We therefore recommend that the principle discussed in the Budd Review be adopted, and that

- gambling takes place in premises for which this is the primary purpose
- opportunities are not increased in other venues.

7. Deficits in Provision and Planning for Problem Gamblers

7.1. The Budd Report commented on the severe lack of provision for problem gamblers, and noted that, “The Departments of Health and Social Security... do not appear to recognise problem gambling as a health issue.” (The Budd Review, p 94) The proposals of “A Safe Bet for Success” effectively follow this institutionalised neglect. The decision not to set targets for reducing problem use suggests that the government continues to view this as a very low priority. We regret that no mention is made of any extra service provision under NHS funding, and believe that gambling problems will continue to be allocated few resources if they have to compete with other mental health needs. Gambling problems are unlikely to qualify as a “mental disorder”, and “A Safe Bet for Success” only makes mention of “the most serious cases”. The vast majority of serious gambling problems for individuals and families would be unlikely to receive any help under this definition and approach.

7.2 This leaves intervention to the fund provided by the gambling industry though the proposed “Gambling Trust.” The total national annual budget suggested for this body is £3 million per annum, to cover both research and intervention. The £3 million figure suggested by the Budd Review was based on the provision of £10 per problem gambler – well below the £44, £40, and £26 spent in New Zealand, Canada, and Australia respectively (The Budd Review, p 176.) Such a figure is highly unlikely to be adequate, and is small in relation to the likely profits of the industry. “A Safe Bet for Success” anticipates “*an increase in net consumer expenditure on commercial gambling of £500 million a year over a five year period beginning in 2004-5*”.

7.3. We certainly welcome the initiatives the gambling industry has shown in already raising money voluntarily for the Gambling Commission and the Gambling Trust. However, since existing provision is wholly inadequate and rises in problem use are almost inevitable, far greater sums than those already suggested or allocated will be necessary for both research and treatment. We hope the government will reconsider and find this a pressing consideration, since socially disadvantaged and excluded people are likely to experience the greatest impacts of problem use.

7.4. We therefore recommend that:

- Extra, dedicated provision be available through NHS and other relevant treatment channels (including some provided by the voluntary sector; other dependency treatment is relevant to service development)

- A levy-rate is set for the gambling industry that relates to profit levels (since these are likely to correlate broadly with prevalence and therefore with rates of problem play).
- Combined government and gambling industry spending equates to the amounts spent on treatment by comparable western nations (i.e. at least £25 per problem gambler)
- A Research Programme is put in place immediately (either from the £0.8 million available for the Gambling Trust or through direct government commission). Such a programme would monitor the changes in patterns of gambling and problem gambling, and be used to inform policy and practice – including the setting of appropriate targets.
- The Gambling Trust research is given an explicit brief to monitor and report on unmet need as regards treatment/intervention and education.

7.5. We reiterate our welcome for the promotion of social responsibility by the gambling industry. This is a new and developing paradigm, and it has to be acknowledged that there may be some tension between the legitimate desire of an industry to increase profits, and the agenda for problem prevention and health. In order to safeguard the appearance and reality of independence, we recommend:

- Scrutiny/review of the functioning of the Gambling Commission and the Gambling Trust through published government processes
- Particular care is taken/mechanisms exist to address the possibility of “affiliation bias” in the research agenda of the Gambling Trust

8. Additional points

8.1. The proposals as a whole leave little room for the operation of local democracy. We believe that decisions are best made at the most local level possible, and would prefer to see Magistrates involved. The criteria for licensing seem likely to be tightly controlled by centrally made guidelines: even decisions about hours of opening would be thus restricted. We recommend that criteria are not so tightly drawn, and allow the operation of responsive local decisions.

8.2. We have some concerns that some of the proposed “interim measures” involve important changes of principle, and may pre-empt subsequent parliamentary consideration. The clearest example relates to drinking alcohol and gambling. If alcohol were allowed on the gaming floor of casinos, it would be difficult for Parliament later to debate the principle of increased opportunities for mixing drinking and gambling when the issue had already been conceded in one important kind of venue. We are appreciative of the fact that the approach to reform so far has been to rationalise and integrate gambling legislation and policy into a coherent and consistent framework. We believe, therefore, that these changes are best considered as a whole, through the normal Parliamentary process.

9. Reference term 5 of the Committee: the National Lottery

9.1. The proposal to allow Pools to offer similar prizes and outlets to the National Lottery seems anomalous with the philosophy of preserving its privileged status, and is likely to undermine NL revenues. Whilst as Quakers we are not in favour of a National Lottery, if it exists we feel that its particular charitable status should be preserved and protected.

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