



Quaker Action on Alcohol and Drugs

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## RESPONSE OF QUAKER ACTION ON ALCOHOL AND DRUGS TO THE CAP AND BCAP CONSULTATION REGARDING ADVERTISING STANDARDS

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 as a body, 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 this consultation.

### **Questions 1, 5 and 7** **Regulation of the National Lottery**

We agree that the National Lottery should be regulated under the same set of codes as other forms of gambling. We do not think that exceptions should be made regarding the age limits for advertisements, notwithstanding the lower age at which the Lottery can be played. The National Lottery is a form of gambling, and the Religious Society of Friends has consistently opposed the promotion of a large-scale lottery by the government. The Religious Society of Friends has also argued for the raising of the age of play for the Lottery to 18, in line with most other forms of gambling. As Quakers we believe it is preferable to support good causes by direct giving and we are disturbed by the accelerating substitution of National Lottery funds for planned public funding of important social projects.

QAAD believes that a consistent message should be given regarding all forms of gambling - and that common standards should apply, so that no advertising is aimed at young people.

### **Questions 6 and 7** **Minimum age limits**

It is difficult to set limits on incidental and significant roles in advertising, and any appearance of visibly young people would be likely to appeal to younger audience. We believe that a common age of 25 be adopted for both roles.

Even though children will be able to play in family entertainment centres, we do not believe that advertising should be targeted at them.

## **Question 2**

### **Achieving the objectives of the Gambling Act 2005**

We have strong concerns that the proposed rules will not secure the third objective of in the Gambling Act. The purpose of advertising is to increase the numbers participating in an activity, and the general evidence indicates that when more gambling takes place, problem gambling also increases, particularly among less advantaged members of society<sup>1</sup>. Research and precedent in the alcohol and tobacco fields indicate that advertising is particularly effective at increasing consumption from a low base, or when previously restricted markets are opened.<sup>2</sup> The role of advertising is a highly significant one, and whilst we welcome the measures for social responsibility in the Gambling Act, there must be a strong element of doubt about whether it will be possible to expand gambling participation without a concomitant increase in problems, particularly among vulnerable groups. Indeed, it is for this reason that the Secretary of State will review the evidence in five years' time.

We believe a precautionary approach is the most advisable, therefore, and welcome the general statement that the 'reduction of harm should take precedence over the maximisation of innovation, consumer choice and economic gains.' However, we feel that if this principle were fully adopted, mass-media advertising (particularly in broadcast form) would be allowed only cautiously and in a phased way, since it would be practically difficult to reverse. However, whilst signalling this larger concern, we are glad that this principle at least will apply to more specific decision-making.

## **Question 8 (and corresponding sections in BCAP guidelines)**

### **Scheduling of advertisements**

We are concerned at the proposal that certain advertising could be addressed at those between the ages of 16 and 18. Whilst audience profiles give general information, there is a blurring of ages of children and young people watching or listening to programmes, and it does not seem in line with the precautionary principle to enable such advertising. We do not agree, therefore, that lotteries, football pools, family entertainment centres or travelling fairs should be advertised to young people.

## **Question 9**

### **Vulnerable adults**

We have similar concerns to those expressed in question 2 on this issue, believing that we are all potentially vulnerable to problem gambling. However, we welcome the general parameters that are set out in 4.20.

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<sup>1</sup> "Those who were not in paid work (nor retired), those in household where the highest income earner was in a manual occupation, and those on lower incomes had significantly higher rates of problem gambling.'

'Gambling and Problem Gambling in Britain' 2003, Orford, Sproston, Erens, White and Mitchell, page 215

<sup>2</sup> Saffer, H. (1996) Studying the effects of alcohol advertising on consumption, *Alcohol Health and Research World*, 20, 266-72; see also summary of evidence in Raistrick, D. Hodgson, R. and Ritson, B. (1999) *Tackling Alcohol Together*, Free Association Books, London.

## **Question 10**

### **Warnings and educational messages**

We appreciate the mixed evidence on warning/educational messages and that judgements in this area are difficult. However, we believe that overall it would be beneficial for this information to be given at the time a product is advertised, and for gambling operators to take responsibility for indicating potential problems. Our concerns here are partly precautionary and partly practical: gambling businesses have large resources to devote to encouraging up-take of their products, whereas public health messages (in the field of alcohol, as a parallel) have a fraction of these budgets.

However, if the decision is taken that health messages are not to be presented alongside with the advertising of products, we think it is vital that gambling operators contribute proportionately to health messages that would be delivered via other bodies (for example, the Responsibility in Gambling Trust).

### **Spread Betting**

We are concerned at the proposal that spread betting will be advertised more widely. It has high-risk gambling features (the possibility of losing more than has been staked and thus effectively to work on credit) and it also some facets associated with problem play (the potential for chasing losses through re-staking in 'live' markets, for example). If it is to occur, restrictions of the kind proposed seem helpful. Even though the audience of the designated channels is likely to be more familiar with conditions than are the general public, we believe that this is a case in which a warning/information message would be particularly appropriate. We hope that effects will be carefully monitored.

### **BCAP rules – note to 11.6.1 (c) and question 12**

We believe that particular care will need to be taken as regards the ways in which 'the benefits of winning a prize' are portrayed, and that this may need more specific definition.

We are mindful of the gap between spirit and letter that has sometimes occurred in relation to the advertising of alcohol, and would like to see a general statement that advertising will be required to observe the spirit as well as the letter of regulations, particularly as regards those relating to children and young people.

We are glad to have had the opportunity to contribute to this consultation, and wish the BCAP and the CAP well in its work.