



Quaker Action on Alcohol and Drugs

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QAAD RESPONSE TO CONSULTATION ON REMOTE GAMBLING CONDUCTED BY THE DEPARTMENT OF CULTURE, MEDIA AND SPORT

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 alcohol and other drugs, and with gambling. QAAD was one of the interfaith groups that gave oral evidence to the Joint Parliamentary Select Committee that considered the Gambling Act of 2005, and we have continued to be actively involved as a stakeholder since that time.

Question 1: Do you agree with the Government's preferred option in relation to EEA and Gibraltar licensed operators? If not, please set out clearly your reasons and let us know if you consider any of the options, or any other option not considered in this paper to be more appropriate.

Yes, we do agree with the government's preferred option. It is vital to ensure a consistency of approach to the licensing objectives that protect children and reduce the likelihood of problem gambling.

Question 2: Do you agree with the Government's preferred option b) above? If not, please set out clearly your reasons and let us know if you consider any of the options, or any other option not considered in this paper, to be more appropriate.

Yes, we do agree with the preferred option. We support the reasoning that led to it - namely retaining the benefits achieved under the current arrangements, whilst providing an incentive for standards to be improved in other jurisdictions. We trust that all efforts will be made to ensure these share the same social responsibility features.

Question 3: Do you agree with the Government's preferred overall option in relation to EEA, Gibraltar and white listed operators? If not, please set out clearly your reasons and let us know if you consider any of the options, any other combination of the options, or any other options not considered in this paper, to be more appropriate.

Yes, we do support these proposals and believe they will help advance the licensing objectives in an effective way.

Question 4: Do you agree with the twin triggers for requiring a licence?

Yes, we think both of these triggers are entirely reasonable and necessary. It is important to ensure that UK standards apply to all gambling conducted in, or from, the UK.

Question 5: Do you agree with the definition of ‘transacting with British consumers’?

Yes, we think this definition is reasonable and covers the relevant situations.

Question 6: Do you agree that the above definitions of advertising are appropriate?

Yes, we agree that the definitions are appropriate. We hope that practice will continue to be monitored, given the fast pace of development of internet advertising.

Question 7: Do you agree that direct mail and spam etc are a low impact and less successful form of advertising?

This is not an area of which we have direct knowledge, but we do have some concerns about it, since the limitations on regulatory powers are unlikely to be clear to consumers.

Banner advertising or e-mails with easily ‘clicked on’ links, particularly those that include ‘free play’ or concessionary offers as inducements are likely to appeal to people who already have a gambling problem – or, at the other end of the scale, to those who are novices and may be vulnerable for this or other reasons. We have, for example, noted banner advertising on an e-mail site that made mention of a win by someone on a low income, which we found questionable. These concerns become acute when sites do not meet social responsibility standards.

The Prevalence Study of 2007 indicated higher rates of problem play amongst internet gamblers, and the conditions involved in it (fast speed, swift ability to replay, and to continue to do so for lengthy periods, as well as the ability to play under the influence of alcohol) carry fewer natural checks than many forms of terrestrial play. For all these reasons we wonder whether this form of advertising can be assumed to be low impact and low risk in the way that it may be for other products. We hope that this area will be kept under active review, and think it would be worthy of research given the importance that advertising on the internet is assuming. We hope too that it will be possible to explore ways of tightening regulation in this area through international agreement.

Question 8: Do you think we should permit the advertising of non-remote foreign gambling without the requirement for the operator to be located in a white listed jurisdiction or to hold a Commission licence?

No, we strongly disagree.

We also find this a puzzling proposal, since it seems at odds with the approach outlined in the rest of the document. Consistency is logical and increases effectiveness, and we see no reason it should not be maintained in relation to the advertising of terrestrial gambling in other jurisdictions. Whilst British tourists abroad will appreciate that regulatory systems are different in other countries, they are likely to assume that

advertising within the UK meets UK standards. It is important that they are afforded this protection.

Question 9: Do you agree with our initial assessment regarding approaches towards compliance of remote gambling operators that may be based wholly or partly overseas? In particular in relation to:

- a. additional fees**
- b. MOUs or other agreements between regulators.**
- c. Requiring some presence in Britain.**

If not, please state your reasons why as well as the approach you consider the Government should take.

Yes, we agree that this is a practical way forward as long as social responsibility standards retain their importance in the process.

Question 10: Do you agree with the Government's proposals relating to offences as set out above? If not please clearly state your reasons why as well as your views on the approach you consider the Government should take.

Yes, broadly speaking. We welcome the introduction of a new offence but can see the practical and proportionate problems involved in extradition.

Question 11: Do you think we have considered that above two restriction measures adequately? If not, please set out clearly your reasons and your views on the approach you consider the Government should take.

We are not convinced that the options for financial blocking have been explored sufficiently. It seems that other jurisdictions manage it, and technologies are becoming ever more sophisticated. From a consumer point of view it is true that it would represent a limitation on adult choice, but it is equally true that consumers may not always know whether a site is white-listed or not. We would hope that this matter could be kept under review in the way that is suggested in the CARE submission to this consultation process.

Question 12: Do you agree that the Government should consider taking powers in legislation to implement technological enforcement measures in the future in the event it became necessary and appropriate to do so? If not, please set out clearly your reasons and your views on the approach you consider the Government should take.

Yes, we do agree that this is entirely appropriate, and necessary given the pace of technological change.

Question 13: Do you agree with the proposed consumer awareness raising measures that we have proposed? If not, please clearly state why as well as the approach you consider should be taken.

Yes, we think these consumer awareness-raising measures would be very helpful. However, not everyone would think to access the Gambling Commission website to check the status of on-line companies. We wonder whether there would be other methods of bringing the system to attention via links or through terrestrial advertising. White-listed companies may support such initiatives.

Question 14: Do you agree with the Government's overall approach to enforcement as set out above? If not, please clearly set out the reasons why as well as your views regarding the approach you consider the Government should take.

Yes.