



Quaker Action on Alcohol and Drugs

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RESPONSE OF QUAKER ACTION ON ALCOHOL AND DRUGS TO THE GAMBLING COMMISSION CONSULTATION ON GAMBLING ADVERTISEMENTS AND IMPACT ON RESPONSIBLE GAMBLING

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 participate in this consultation and are pleased that these matters are being reviewed. In view of the established link between prevalence and problem behaviours, we believe that the precautionary principle needs to be adopted in relation to problem gambling.

Questions 1 and 2 **Compulsory messages and types of messages**

We believe that compulsory messages on gambling advertisements would be beneficial. We are aware of the mixed evidence in the field and appreciate that there may be a danger of an adverse 'boomerang' response to health messages, particularly among certain 'vulnerable' groups. However, gambling is one of several activities in which there are public (as well as personal) health issues - and in the parallel fields of legal drugs and foods there is a general movement towards greater information being made available to the public, including that relating to risk. Gambling is unusual in that it is an activity that has not been mass-marketed before in this country - and indeed we think changes in this critical area should have been taken more cautiously. However, since advertising aimed at increasing gambling is to be permitted, we believe it should begin on the clear basis that gaming is 'more than a game' (as one of the educational messages states). This would ensure the public has some balance of information from the outset.

We believe that the three types of message all have a valid and important function, though the distinction between 'warning' and 'educational' may blur somewhat, as the examples in the consultation document illustrate. We believe that both a brief

educational/warning message (of nature the cited) and a brief signposting message should be included. We appreciate that this involves two messages, but are sure that the creative talents of the gambling and advertising industries could be applied to incorporate them both successfully.

Question 3
Display of jurisdiction

We believe it helps consumer choice for the licensing jurisdiction to be cited and that this should happen. This is particularly important on websites, but we feel it is of significance for all forms of advertising. We believe consumers are equal to the challenge of sorting out different licensers, and that customers will learn to identify UK licensed or 'whitelisted' sites - which may encourage gambling businesses to apply for this status.

Question 4
Regulatory approach

We believe messages should be enforced through statutory regulation, since this is the only method that would ensure a 'reach' to all UK consumers. It would also ensure minimum standards about the way in which this is done: whilst the voluntary codes in the alcohol sector are to be welcomed, they are not consistent across the industry. As regards remote gambling, the inclusion of these messages should be a condition of DCMS 'whitelisting' status.

Whilst we believe statutory regulation is necessary to ensure consistency, we would not want this to undermine the voluntary commitment of the industry, or reduce it to mere compliance. We are particularly aware that the industry has relevant skills in terms of refreshing old messages and keeping them appealing and relevant. A creative approach of regulator and regulated will need to be taken to ensure that safety messages do not lose their power over time.

This area raises a more general point: we believe that if social responsibility is to be effective, an outcome-focused approach should be encouraged from the industry, rather than one that works mainly in terms of process and compliance. This would mean, for example, that the industry would take some responsibility for monitoring the effectiveness of health messages and revitalising them when necessary, in the same way that they would with their other marketing campaigns. This kind of process would, of course, be best routed through the RIGT, or conducted in consultation with it and the Gambling Commission itself. In this context, we are concerned that the RIGT's funding is still too little to undertake this kind of work, and certainly to mount/commission an effective public health strategy. In the alcohol field, safety messages (either funded by the industry or public health campaigns) have a fraction of the immense resources that are devoted to advertising and promotion - and their limited effectiveness is likely to be related to this. We hope that these broader issues will be addressed by the group that the RIGT is convening.

Questions 5 and 6

Enforcement of statement of licensing

We believe that licensing status should be enforced by statutory regulation for all those advertising in Great Britain, including non-broadcast adverts. We disagree strongly with the CAP/BCAP proposal, which effectively treats a statement about licensing as a marketing tool to be deployed by gambling businesses, rather than as a consumer right.

We would find it difficult to give a priority between the educational/warning messages and the jurisdiction in which it is licensed, believing that both should be included. However, on the basis that they are both present, the message would seem the most central in terms of public health.

Question 7

Appropriateness of different media advertising

We believe these messages should be included in all forms of advertising. We feel it is legitimate for the industry to bear the costs involved, since this embodies the principle that expansion must involve a commitment to social responsibility, including precautionary measures. We do, however, take seriously the possibility of a loss of impact through repetition of such messages, and hope that this will be researched and evaluated (as well as approached in the way outlined earlier).

Questions 8 and 9

Children's replicas

We believe children's replica sporting strips should not carry branding of gambling operators at all. We appreciate that older children may simply wear adult strips, but the fact that this may happen in some cases should not weaken the principle that 'gambling and children do not mix.'

Question 10

Other aspects of advertising/promotion

We have many concerns about the potential consequences of widespread advertising – including hoardings at sports venues and in other locations - and about sponsorship of sports. We appreciate that some gambling operators are already closely involved with other sports, and particularly with football: one of our concerns is that gambling may be placed implicitly in a sporting, health-enhancing context, rather in an adult framework as an activity that can carry some risk. We feel it is inappropriate, therefore, for gambling advertising to be on hoardings at sporting events, particularly those that are broadcast. We appreciate that this is not consistent with alcohol regulation, but the difficulties of tackling alcohol problems when both use and misuse are embedded in the culture, should give rise to a cautious approach.

Our view is that sponsorship and advertising, particularly in media/forms that are readily accessible to children, should be limited until the Secretary of State reviews the evidence on problem gambling in five years' time.

We are pleased to have had the opportunity to contribute to this consultation, and wish the Commission well in its work.