



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 GAMING IN CLUBS AND ALCOHOL LICENSED PREMISES**

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 and are shared by many Quakers. 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 some points of principle to make in relation to these proposals, and some more specific comments.

### **1. Extending the entitlement increases the risk of problem gambling**

1.1. We have major concerns about the proposals that extend the entitlements regarding the types of gaming that can be played on alcohol-licensed premises, particularly to include poker. This would represent a major change in pub and club culture, and our reading of the evidence is that it would carry a definite risk of increasing the rates of problem gambling. Our concern is based on the following evidence and principles:

- **These proposals substantially increase opportunities for ambient gambling.** The principles of responsible gambling are based on evidence that problem rates are lower if people make a conscious decision to go to a venue which is specifically designated for gambling, and plan their spend accordingly. Gambling in pubs – which is a major leisure venue for many people – increases the likelihood of casual gambling occurring, and therefore carries the risk of increasing problem rates.
- **Regulation of types of gambling should be based on risk: cribbage/dominos carry substantially less risk of problem gambling than poker.** It is of course true, as these proposals suggest, that cribbage can be played for money and poker can be played for points. However, the practical reality is that traditional pub games like cribbage and dominos are played predominantly as a past-time with a strong social element: when money is involved at all, the stakes are very low. Poker, by contrast is predominantly perceived and played on individual basis with gambling as its predominant motivation – and staking is an inherent part of the game in a way that it is not with cribbage and dominos. Poker is a high-adrenalin game that involves continual opportunities for re-staking - and high 'event frequency' is known to be associated with higher problem rates. To conflate the two types of game under the same heading on the technical basis that they are both categorised as 'equal chance' ignores both theoretical evidence of problem characteristics, and actual evidence of problems arising from this form of gaming. Limiting the stake and prize does not mitigate these risks.
- **These proposals 'mix gambling and children' and increase risk to them.** The Secretary of State acknowledged that gambling is an inappropriate activity for children – but children are, of course, allowed into alcohol-licensed premises. Even though these proposals prevent them taking part in gambling, they would be witnessing it at close quarters and likely to be influenced by it. This departs from the precautionary principle, as well as from some of the principles that the Gambling Commission is embodying in practice standards. In view of the higher rates of problem gambling among adolescents, this is a matter of acute concern.

- **Alcohol consumption increases the risk of problem play, and the risk of co-morbid problems.** Alcohol consumption is associated with a range of gambling problems from unwise play to full-blown co-morbidity of severe alcohol and gambling problems. To increase the circumstances in which such problems could occur and develop carries obvious (and unnecessary) risk. Young adults, who are particularly prone to both kinds of risk, may be especially likely to be drawn into gaming through peer pressure.
- **The risks involved in widening other gambling opportunities under the Gambling Act have yet to be countered and assessed.** The Gambling Act was preceded by a debate and public concern at how its measures might increase rates of problem gambling, since research indicates that wider participation in gambling is often associated with increased problem rates. While responsible gambling practices and harm minimisation policies are an integral part of the Act, their impact and effectiveness have yet to be assessed. The prevention measures to be undertaken by the Responsibility in Gambling Trust are still being developed, while these proposals would be swift in their action. To make a significant change - which would impact on the wider culture - at such an early stage and before this evidence has emerged adds an extra risk.
- **Local democracy and responsiveness would be compromised.** These proposals would confer an entitlement for this gambling to occur, which, it seems, could not be challenged by local residents even under the relatively limited terms that are allowed under the Gambling Act. Proliferation or local concerns about particular impacts could not be tackled through local democratic procedures. The lack of such a mechanism is a matter of concern.
- **These measures would allow gambling separate from Gambling Commission procedures and regulations.** The proposal is for a code of practice to govern gambling in pubs and clubs, but this effectively sets another system for gambling, which would seem to be outside of the other regulatory structures.
- **These proposals would be difficult to enforce.** Gambling establishments track winnings because it is part of their raison-d'être; to pubs and clubs the stakes and takings would be incidental to their core business. The practicalities of monitoring £5 stake limit on games would be particularly difficult to enforce.

For all these reasons, we believe that the entitlement to the types of gaming allowed in alcohol licensed premises should remain as it is. We believe the existing system of premises applying for extension to other types of gaming should be retained.

## **2. Specific points**

**Question 6 Prescribed games** We strongly agree that poker should not be a prescribed game, and that poker clubs should not be able to offer alternative gambling venues outside of the regulatory structures.

**Questions 7/10/18. Other games and poker** We agree that poker should be treated with particular caution, as we have indicated. We are not aware of other games that would cause similar problems, but suggest that the evidence-base on risk elements in particular types of play (such as the opportunity for swift re-staking and high event frequency) is used as a framework of assessment.

**Questions 8 and 11 Low-stake gaming in clubs and pubs** In so far as we think that no gambling should take place in these venues, we do not support this principle. However, if it is to be allowed, a low-stake threshold is better than none. If this approach is adopted we would like to see lower thresholds than those indicated.

**Questions 12, 22 and 23.** If poker is to occur in these venues, we think a code of practice would be helpful. Display of sources of help for problem gamblers and their close others, and a brief check-list of problem symptoms would be useful.

We would also suggest that if these proposals are adopted, consideration be given to limiting the hours at which poker could occur in alcohol licensed premises. Whilst this would not give children the total protection we would like to see, restricting the hours to evenings – perhaps after 8 p.m. – might help ensure that younger children at least would be less affected.

We are pleased to have had the opportunity to take part in this consultation.