

G Chalmers  
Please Link to 04/00042



31<sup>st</sup> March 2004

the children's charity

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Rt Hon. Tessa Jowell MP  
Secretary of State  
Department of Culture, Media and Sport  
2-4 Cockspur Street  
London SW1Y 5DH

Dear Secretary of State,

### Draft Gambling Bill and the welfare of children and young people

Thank you very much for the opportunity to take part in the meeting with children's charities to discuss the Draft Gambling Bill. We were very disappointed that it coincides with a meeting of our trustees, which means that no senior member of staff is able to attend.

As you will know, NCH supports thousands of children and families across the UK. Many of these children are growing up in families on low incomes or families under stress or pressure for other reasons, for example because of domestic violence, mental health or substance abuse problems. Research has repeatedly shown that these factors are common amongst people who go on to become problem gamblers.

Few people would claim that gambling is as serious a threat to children and young people's welfare as, say, drug or alcohol abuse. However, research suggests that it is more prevalent than might be imagined and that it can have a devastating impact on children's development during their crucial adolescent years. We hope that the proposals for legislation will reduce, and not increase, children's vulnerability to addictions.

NCH welcomes the measures in the Draft Bill that are aimed at excluding children from gambling opportunities and venues. It is also important that the protection of children is one of the stated objectives of the Government's policy in this area and of the Gambling Commission.

We also welcome the Government's assertion that "gambling and children do not mix". Children who develop addictive gambling behaviours have been shown to perform less well at school and to have disrupted home lives, factors that are likely to impact negatively on them well beyond adolescence. Problem gamblers are shown to have started gambling at a much earlier age on average than social gamblers. The Draft Bill should be seen as an opportunity to tackle this often hidden problem.



INVESTOR IN PEOPLE



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### **Fruit-Machines**

However we are concerned that the Government is not taking the opportunity of legislating to remove the anomaly of children's legal access to low value fruit machines. This gives the impression – misleading to parents and children – that the lower stakes and prizes somehow make these fruit machines “safe”.

Research by academics such as Fisher and Griffiths, of which you will be aware, strongly suggests that the addictive mechanisms of fruit machine gaming – the inter-activity, speed of play, ability to chase losses - are the same regardless of the stake or prize involved. Restricting machines to 10p stakes will not reduce their addictive potential, and few children as young as nine or ten will have the emotional maturity to cope with winning or losing £5, which is a significant amount for a child at that age.

We would therefore ask the Government to end the anomaly of allowing children to gamble by raising the age for fruit machine gaming to 18 years reflecting practice in the rest of the western world.

Of particular concern to us are the fruit machines that are located in non-gambling venues such as take-away shops or mini-cab offices. Under the current proposals these will remain unlicensed and unregulated, and therefore most open to abuse. Traders may claim that they are dependent upon such machines for their livelihood, but this assertion has to be weighed against the need to protect children.

### **Remote Gambling**

Remote gambling through computers, mobile phones and the television, is clearly a growth area. Many children and young people are far more comfortable with these new forms of technology than their parents. We welcome the Government's decision to licence British internet gaming sites and to bring them within the scope of the Gambling Commission. However, the Social Responsibility Codes governing remote gambling will need to be particularly stringent in requiring operators to identify users positively and therefore to ensure the exclusion of children from their sites. Some websites currently accept Solo and Delta cards which are available to children as young as 14 years old. We are also concerned about gambling “spam” which may be sent to children, particularly if these offer “free trial bets”.

### **Access to gambling premises**

Under the proposals children will still be allowed access to certain gambling venues – for example pubs and bingo clubs where gaming machines will be available for use. This will put the staff at such venues under huge pressure and we remain uneasy about how these measures will work in practice, and how venues will guarantee the protection of children.

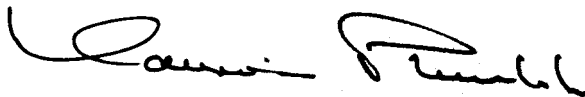
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## **Education**

There is clearly still a significant need for education around gambling for young people. Gambling safely involves understanding the risks and probabilities involved, seeing it as a leisure activity which costs money rather than an investment opportunity, and knowing where to turn for help. Similarly, parents need to be helped to understand that gambling is an adult activity and to recognise the danger signs in children and young people. We would support moves to increase awareness amongst children and young people of the need to gamble safely.

We are grateful for the opportunity to explore these issues with you and apologise again for not being able to attend the meeting. We hope that these comments will help you in your deliberations and ask you to take this opportunity to protect the minority of children for whom gambling is a real and damaging problem. In our view this would help to reinforce broader Government policy for children, set out in the Green Paper Every Child Matters and in the Children Bill, which received its second reading in the House of Lords just a few hours ago.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Maurice Rumbold', written in a cursive style.

**Maurice Rumbold**  
Interim Chief Executive  
NCH