



Draft Gambling Bill

A response from The Salvation Army

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1. Executive Summary

- The Salvation Army welcomes the Government's commitment to protect children and vulnerable people from the negative effects of gambling. However, it questions the level of demand for an increase in gambling opportunities. In research conducted by NOP for The Salvation Army 93% of the British public said that there are already enough opportunities to gamble in the UK.
- It is a concern that children and young people under the age of 18 will still be allowed to play low-value fruit machines under the current proposals. The Salvation Army thinks this runs counter to the Government's claim that gambling should be for 'adults only'. 82% of the population think that people under the age of 18 should not be allowed to play fruit machines.
- Local people should be given the power to influence planning decisions regarding the building of new casinos. Over half of the people surveyed said they would not be happy for a casino to open near to where they live.
- Substantial research should be carried out before liberalisation of the gambling laws to judge the likely consequences of the proposed regime. Deregulation should not outpace research.
- Gambling with credit should not be made widespread. There is already an identifiable problem with consumer credit in the UK and enabling widespread gambling on credit can only make that worse. 94% of the population thinks that allowing people to gamble using credit cards would put people at greater risk of incurring gambling debts.
- The Salvation Army welcomes the proposal that the gambling industry should contribute towards the cost of treatment for problem gamblers. However, it is concerned that a figure of £3m is woefully inadequate given the likely upsurge in the number of gambling opportunities and the almost inevitable accompanying increase in problem gambling.

2. Introduction

The Salvation Army is grateful for the opportunity to give its views on the Draft Gambling Bill. It supports the licensing objectives outlined in the draft Bill wholeheartedly, particularly the need to protect children and vulnerable people from being harmed or exploited by gambling.

The Salvation Army is a Christian church and the largest and most diverse provider of social care in the UK after the Government. The Salvation Army works with many of society's most disadvantaged people and aims to offer practical help wherever the need is great. However, The Salvation Army is also committed to the pursuit of social justice and it is this that drives it to seek to influence public policy in ways that protect the vulnerable.

The Salvation Army is happy to support the specific comments made in the response of The Methodist Church.

3. General Comments

The Salvation Army accepts that for most people gambling is an enjoyable leisure activity, although it notes with interest that even the Secretary of State only goes so far as to call it 'predominantly harmless'. For a minority of people, however, gambling is anything but harmless. Its effects can ruin lives, destroy relationships and tear apart families. The Salvation Army recognises that the Government has a difficult and precarious balance to strike but it is concerned that in some instances liberalisation is outpacing research into the consequences.

In anticipation of the draft Bill The Salvation Army commissioned public opinion research from NOP into the public's attitude towards some of the issues found in the Bill. The research, which will be referred to in more detail throughout the submission, showed that:

- 93% of the population thinks there are enough opportunities to gamble in Britain at the moment;
- 82% of the population believes that children under the age of 18 should not be allowed to play fruit machines;
- 94% of the population thought that allowing people to gamble using credit cards would put people at greater risk of incurring gambling debts;
- 82% of the population thought that people were more likely to lose money if they drank alcohol while gambling;
- 56% of the population, and 64% of women, would not be happy for a casino to open near to where they live.¹

¹ NOP poll was conducted by telephone between 28-30th November 2003 amongst a nationally representative sample of 973 adults aged 18 and over.

The Government has admitted that the new gambling regime will see a substantial increase in gambling opportunities but the research conducted for The Salvation Army shows that there is virtually no public demand for this. The Salvation Army would question, therefore, the need for the expansion of an industry which the population thinks is large enough already.

In a speech to Gamcare's 2003 annual conference Richard Caborn MP said that the Government would be disappointed if the number of people addicted to gambling rose after liberalisation. The Salvation Army inquired then, and is still yet to ascertain, how the Government intends to reduce the percentage of gamblers who have a problem, for if the percentage remains static, but the number of people gambling goes up, then the number of problem gamblers will also rise. As far as The Salvation Army is aware the Government has not stated publicly that a rise in gambling opportunities, particularly of the more addictive types such as casinos, will almost definitely lead to a rise in the number of problem gamblers.

The Salvation Army believes that in every instance where the Government plans to relax current restrictions extensive research should be carried out as to the likely effects. The Government should fund research as the process moves forward and commit in the strongest terms to reversing any decisions which are having negative social consequences. It is a concern that 'vulnerable people' are not defined in the draft Bill.

The Salvation Army welcomes the proposal that the gambling industry should contribute towards the cost of treatment for problem gamblers. However, it is concerned that a figure of £3m is woefully inadequate given the likely upsurge in the number of gambling opportunities and the almost inevitable accompanying increase in problem gambling.

4. Children and young people

The Salvation Army wholeheartedly supports the Government in its stance that 'gambling is for adults only'. It believes that gambling safely requires life experiences and maturity which can only be guaranteed, and then only imperfectly, by excluding children and young people. The best available evidence strongly suggests a correlation between starting to gamble at a young age and problem gambling in later life. Dr Sue Fisher has found a noticeable association between problem gambling and starting gambling at 14 or younger. She found that 64% of severe problem gamblers and 50% of problem gamblers had started gambling at age 14 or below whereas only 16% of social gamblers had started gambling by the age of 14.² The Salvation

² Fisher, S, 'Gambling and problem gambling in British adolescents', a report to a consortium of the British casino industry, University of Plymouth quoted in Orford, J, Sproston, K, Erens, B, White, C, & Mitchell, L, *Gambling and Problem Gambling in Britain* (London, Brunner-Routledge) 2003.

Army welcomes the new offences that will be created by the Bill in relation to 16- and 17-year-olds seeking to gamble and, even more importantly, for adults who enable or permit anyone under the age of 18 to gamble.

The Salvation Army is very disappointed, however, that having outlined its commitment to maintaining gambling as an 'adults only' activity the Government plans to allow children to have free access to 'Category D' gaming machines. For children of any age a £5 prize is not an insignificant attraction. However, it is the wider principle that is more important. The only difference between a Category A machine and a Category D machine is the size of the stake and prize; the process involved is exactly the same. By allowing children and young people under the age of 18 to play Category D machines the Government is diluting its main message about protecting children by implying that gambling is, in fact, acceptable for children as long as the amount of money involved is low. That is a very different position to stating that gambling is only for adults.

The Government is also out of step with public opinion on the issue of allowing children to play fruit machines. In the survey carried out by NOP for The Salvation Army 82% of respondents did not think that children under 18 should be allowed to play fruit machines. It was pointed out to respondents that children would be allowed to play only 'some types of fruit machine' but the response was overwhelmingly negative.

The fact that Category D machines will be readily available to children in non-gambling outlets means that they will be virtually unregulated. There will be no mechanism to monitor the playing habits of young children in many of these venues. Again, The Salvation Army believes this runs contrary to the Government's stated intention of protecting vulnerable young people.

The same could be said of the anomaly which allows children to play the National Lottery and football pools. Here the inference is that it is acceptable for children to gamble as long as the activity is 'relatively low risk'.³ The Government may be right about the relatively low risk, although the Gambling Prevalence Survey 2000 showed that something as supposedly innocuous as the National Lottery has the possibility of being addictive in its own right, but in its statement of policy the Government does not qualify its view that gambling is only for adults. It does not distinguish between 'high' and 'low' risk gambling. In practice, however, the Government's policy is qualified to an unacceptable degree.

5. Casinos

The Salvation Army is very concerned about the increase in casinos that will be brought about by the proposals in the draft Bill. Research has shown that

³ Draft Gambling Bill: The Policy p. 49

the types of gambling offered by casinos are among the most addictive and any increase in casino-based gambling is likely to cause a disproportionately higher increase in problem gambling than an increase in other forms of gambling.

The Government is aware of the level of disquiet in communities mooted as potential locations for new casinos. Indeed, the research commissioned by The Salvation Army from NOP shows that 56% of the population as a whole, and 64% of women, would not be happy for a casino to open near to where they live. Communities must be given the opportunity to express their concerns and fears in the planning process - and these concerns and fears must be listened to. Moreover, the planning regime should enable social factors to be taken into account when decisions are made. The Salvation Army is concerned that the draft Bill seems to enable only those who live very near to a proposed casino to object. This is completely unacceptable when one is considering introducing gambling facilities on a scale never seen before in Britain. The Salvation Army proposes that anyone within the 'catchment area' of a proposed casino should be able to object.

The Salvation Army is very concerned about the mixing of gambling and alcohol. The Government rightly points out that gambling is an adult activity that requires mature brain functionality and developed cognitive reasoning. Alcohol, in virtually any quantity, reduces cognitive functionality substantially and increases the likelihood of making rash choices. Indeed, in the NOP research carried out for The Salvation Army 82% of the population said that they thought people were more likely to lose money if they drank alcohol while gambling. The Salvation Army is concerned that the recent decision to allow alcohol onto the gaming floor of casinos was made with little consultation or, to the best of its knowledge, research into the potential effects. It is this kind of decision that makes The Salvation Army nervous about the amount of 'flexibility' in the draft Bill. The Salvation Army believes that there should be a clear demarcation in mixed entertainment complexes between areas where alcohol is served and areas where gambling is allowed.

The Salvation Army also thinks that there is a very strong case for keeping the membership requirement for casinos, even if membership is available immediately upon production of identity documents. This adds another check to the system and requires people to pause before playing.

6. Credit

The Salvation Army is very concerned about the possibility of extending the availability of gambling with credit. This view seems to be shared by the population as a whole, 94% of whom think that making gambling with credit cards more widespread puts people at greater risk of incurring gambling debts. Given the current fears about the level of consumer debt it seems the

wrong moment to be legislating for gambling with credit. The Salvation Army is aware that some gambling can already be undertaken using credit cards but it believes the Government could use this opportunity to tighten up that area. There are many other ways of paying for gambling products that offer less of a risk to the financially vulnerable. Gambling debts on credit offer a double penalty - the gambler has to pay back the loss and the interest.

7. Internet gambling

The Government is absolutely right to address the area of internet gambling which is an ever-growing concern. Initial research seems to show that gambling on the internet may be more addictive than many other forms of gambling although far more work needs to be carried out in this area. The Salvation Army believes that the dangers inherent in internet gambling may warrant its exclusion from the forms of gambling permitted in Britain, particularly as countries that have lived with internet gambling for a short time, such as the USA, are reassessing their position following the negative social impact.

However, it has to be recognised that internet gambling is already available to British citizens through websites registered abroad which are subject to minimal or no regulation. Therefore, with great caution The Salvation Army supports the Government's proposals to licence internet gambling in Britain as long as the most rigorous social responsibility codes are enacted to protect children and vulnerable adults.

As an extra precaution, given the higher addictive possibilities of internet gambling, The Salvation Army thinks that credit cards should not be used as a method of payment. It is recognised that many sites may wish to use credit cards as a way of authenticating a person's age but it would be completely unacceptable for knowledge of a valid credit card number alone to be taken as proof of age. The current National Lottery website runs successfully only using debit cards and also adheres to age verification guidelines using iAC (interactiveAgeCheck). The site also gives users the opportunity to self-exclude and includes regular 'reality checks'. The Salvation Army believes that this site exhibits many elements of good practice and, although not perfect, shows that credit cards are not necessary to verify age.

8. Conclusion

In many ways problem gambling is an unseen addiction but where it exists it can cause havoc in people's lives and tear families apart. The theme running through the NOP research conducted on behalf of The Salvation Army is that the Government is out of step with the public on many issues raised in the draft Gambling Bill. There seems little or no demand for an increase in

gambling opportunities. Despite talk of regeneration, with 'resort casinos' for example, it seems the people who will truly benefit from the proposed legislation are the gambling industry, which stands to make substantial profits, and the Government through increased tax revenue.

The Salvation Army supports the Government in its aim to protect children and the vulnerable but fears that the legislation as it stands paves the way for a substantial increase in problem gambling with all the associated social costs.