Written submission from Quaker Action on Alcohol and Drugs

Quaker Action on Alcohol and Drugs (QAAD) is a listed group of the Religious Society of Friends (Quakers). QAAD is an independent national charity and has a concern with the use and misuse of all substances, and with gambling. Trustees give their time to QAAD freely, and bring voluntary and statutory experience from settings that include prevention, treatment, medical services and criminal justice. QAAD was one of the faith-based bodies that gave oral evidence to the Joint Parliamentary Select Committee that scrutinised the Gambling Act in 2004. Since that time we have given evidence to two further Parliamentary Committees and have been actively involved as a stakeholder. We attend meetings of consultative groups convened by the Gambling Commission and the Responsibility in Gambling Strategy Board, and we have responded to numerous government consultations on gambling policy.

Preferred option on the proposals for Clause 45

QAAD supports the proposal of the Scottish government to amend the wording of the Bill to allow the Scottish Parliament retrospective powers in responding to the problems of Fixed Odds Betting Terminals. Our reasons for this are:

- Fixed Odds Betting Terminals are high-risk machines because of structural characteristics that include stake size, and because of their wide availability.
- FOBTs are cited by a high proportion of those seeking help for problem gambling: 30% of those who access Gamcare's services and more still of those seeking help from the National Problem Gambling Clinic. The proportion of gamblers who actually use these machines is roughly 5%; this significant imbalance between participation and problem rates is a clear indicator of risk and harm.
- Recent research confirms these concerns by showing high levels of problem gambling among Loyalty Card Holders of betting shops - 23% were problem gamblers, 24% moderate risk gamblers, and 24% low risk gamblers¹.
- The recent study of Loyalty Card holders also showed higher rates of problem gambling among those in disadvantaged groups. In this sample, around one in three men (33%) and one in four women (24%) with personal incomes of less than £10,400 per year were classified as having some level of problem gambling. Among those earning over £32,000 per year, estimates were 15% for men and 3% for women.
- Earlier evidence had shown that machines are found in greater numbers in areas
 of deprivation, that machine gambling 'was significantly higher among those who
 were unemployed, had low personal income and/or were living in areas of
 greatest deprivation.² Another relevant study also showed that a significant
 percentage of revenue comes from problem gamblers³, particularly as regards
 FOBTs.

¹ Identifying problem gambling - findings from a survey of loyalty card customers. (2014) Heather Wardle, David Excell, Eleanor Ireland, Nevena Ilic and Stephen Sharman

² Wardle, H., Keily, R., Astbury, G., and Reith, G. (2013) 'Risky places?': mapping gambling machine density and socio-economic deprivation. Journal of Gambling Studies.

³ Orford, J., Wardle, H and Griffiths, M (in press 2012) What Proportion of Gambling is Problem Gambling? Estimates from the 2010 British Gambling Prevalence Survey

 The greater concentration of bookmakers in areas of disadvantage was confirmed by the 2014 suite of research, which showed that: 'Players overall tend to live in neighbourhoods with higher levels of resident unemployment, multiple deprivation and economic inactivity and which are more ethnically diverse than the national average.'4

It is apparent, then, that bookmaker's offices tend to be more heavily represented in areas of disadvantage. Easy accessibility is known to be a risk factor for problem gambling, and populations in these areas are likely to be suffering higher rates of problem gambling, with all the attendant stresses for the individuals themselves, their families, and their close others.

Density has been an associated problem because Licensing Authorities are unable to limit licence or machine numbers on the grounds that High Streets may already have large numbers of them. We agree, therefore, with the analysis of the Scottish government that retrospective powers are needed to address problems in areas where proliferation has already occurred. We also hope that this would be addressed in ways that would not allow any further proliferation, either of premises or machines. All of these measures would be desirable in allowing local and democratically accountable decisions to be taken on the basis of the needs and wishes of the community.

QAAD has also argued for a significant reduction of stake size to £2, which would make it comparable with other widely available slot machines. We hope that this too will receive consideration as a harm-minimisation measure.

We welcome the efforts of the Scottish government to address this issue, and believe its proposal is in the interests of public health and well-being. We hope that it will be successful.

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⁴ Contextualising machine gambling characteristics by location - final report (2015) Geofutures, p 3