

Against the odds...?

Information about the Gambling Act 2005 and problem gambling

Contents

1. Gambling – The Facts

Description. Problem gambling. Statistics.

2. Gambling Policy

Government Policy. Internet gambling. Advertising. Casinos. Licensing Authorities. The Gambling Act. The Gambling Commission.

3. Industry Response

Gambling Research, Education and Treatment Foundation. Responsible Gambling Strategy Board. Responsible Gambling Fund. Other Industry Involvement.

4. Types of Gambling

Raffles / Tombolas. The National Lottery. Other Lotteries. Premium Bonds. Pools. Bingo. Betting on racing and sporting events. TV Shows. Gaming in Pubs and Clubs. Equal Chance Tournaments. Casinos. Gaming Machines. Fixed Odds Betting Terminals. Remote betting and gaming. Spread Betting.

5. Christian Reflections on Gambling and Problem Gambling

6. Christian Organisations' Policies on Gambling

Statements and policies. Rules on fundraising. Sources of further information.

7. Who else is involved?

GamCare. Gordon House Association. Support groups. Regulators. Local authorities. Researchers. Campaigners.

8. What Can You Do?

Personal conduct. Education. Licensing. Advertising. Support local treatment services. Become a counsellor. Get gambling on the political agenda. Pray.

The  **Methodist Church**



For some people, occasional gambling may be a part of their normal social activity. However, whilst many people enjoy a flutter or a bet from time to time, gambling can become addictive and cause many problems.

Problem gambling impacts on the individual, their friends, family and colleagues, and on society. Financial pressures can build on people who have problems with their gambling so they are forced to borrow or steal more and more money.

The 'normalisation' of gambling through public acceptance of the National Lottery and the increase in opportunities to gamble, especially through the internet, means that more and more people are likely to come into contact with gambling, and problem gambling.

This paper is designed to inform people about some of the issues to do with gambling, and what action people can take if they want to do something to help problem gamblers.

This document has been written by the Methodist Church and The Salvation Army

The Methodist Church



and is supported by

The Baptist Union of Great Britain, CARE (Christian Action Research and Education), the Church of England, the Church of Scotland, the Evangelical Alliance, Quaker Action on Alcohol and Drugs and the United Reformed Church.



evangelical alliance
uniting to change society



Quaker Action on Alcohol and Drugs



1. GAMBLING – THE FACTS

Gambling takes the following forms:

- (a) Gaming, or playing for money in a game involving an element of chance
- (b) Betting, or staking money on a doubtful or uncertain event
- (c) Lotteries and sweepstakes, which may be defined as the distribution of prizes by lot or chance

The **New Dictionary of Christian Ethics** defines gambling as:

- (a) The determination of the possession of money or money value by an appeal to an artificially created chance;
- (b) Where the gains of the winners are made at the expense of the losers, and;
- (c) The gain is made without rendering an equivalent in service or value.

Problem Gambling is the term used when someone becomes dependent on gambling, or their gambling habits start to cause serious difficulties for themselves or others.

Someone is likely to have a gambling problem if they:

- Request help
- Admit that they spend too much money or time gambling and that they cannot keep away
- See gambling as a legitimate means of making money
- Persuade friends to gamble against their will
- Gamble alone for long periods
- Frequent amusement arcades, betting shops, horse and dog tracks, or casinos several times a week
- Spend excessive time playing on Internet gambling sites
- Commit crime to fund gambling or pay off gambling debts

People with extreme gambling problems can sometimes be referred to as ‘pathological gamblers’. The symptoms usually cited (and included in screening tests) are:

- Gambling beyond your means or in a way that adversely impacts on other financial demands
- Gambling in a way that damages relationships or work (e.g. by lying about it) or prioritising gambling over other interests
- Chasing losses (gambling more to recoup losses rather than quitting)
- Gambling to escape worries or to alter mood
- Mental / emotional preoccupation with gambling
- Upset, anxiety, depression or anger when not able to gamble
- Debt / borrowing to finance gambling or turning to illegal acts

Gambling which is continuous, repetitive, has no distractions or interactions with other people, has a short gap between stake and result and conditions of high excitement during the gap is more dangerous as these conditions make it more likely for someone to develop a gambling problem. Examples might include playing on fruit machines or online poker. These forms of gambling are known as ‘hard’. ‘Soft’ forms of gambling are less likely to cause someone to develop a gambling problem, such as playing the lottery. The value of stakes and prizes can also determine how risky a particular gambling activity is.

High-value slot machines are harder than low-value slot machines – though both have the potential to lead to gambling problems.

Personal symptoms of having a problem with gambling may include:

- A loss of motivation / interest in other activities
- Increased lack of concentration
- Weight loss
- Insomnia
- Unusual aggression or extreme elation
- Mood swings
- Depression and anxiety
- At its extreme, thoughts of suicide

Other indicators could include poor performance at work, alienation from family and friends, financial difficulties, loss of other interests.

Responsible gambling, by contrast, is usually held to mean:

- Deciding how much money you will stake in a particular session before you start - only stake money that you can afford to lose.
- Not chasing your losses hoping to make up money that has gone.
- Knowing the rules of the game and the statistical chance of winning.
- Being aware that the influence of alcohol or drugs, or even tiredness can affect judgements and alter perceptions of risk.

According to the *British Gambling Prevalence Survey 2007*, 68% of the population (about 32 million adults) had participated in some form of gambling activity within the past year.

The following statistics from the prevalence survey report show the popularity of different forms of gambling:

| Percentage of UK adults gambling during the last 12 months¹ | | |
|---|-------------|-------------|
| <i>Activity</i> | <i>2007</i> | <i>1999</i> |
| Playing the National Lottery | 57 | 65 |
| Buying scratch-cards | 20 | 22 |
| Betting on horses | 17 | 13 |
| Playing on fruit machines | 14 | 14 |
| Bingo | 7 | 7 |
| Betting on dogs | 5 | 4 |
| Betting with a bookmaker (not horses or dogs) | 6 | 3 |
| Internet Betting | 4 | - |
| Gaming in a Casino | 4 | 3 |
| Internet Gaming | 3 | - |
| Doing the football pools | 3 | 9 |
| Spread Betting | 1 | - |
| No Gambling | 32 | 28 |

¹ British Gambling Prevalence Survey 2007

GamCare, a problem gambling care services charity, runs a telephone helpline. In 2007 they received 37,806 calls. The gambling activities most often cited by callers were betting, Fixed Odds Betting Terminals, fruit / slot machines and casino table games.

GamCare's statistics only show how many calls of a particular nature have been received; they are not a scientific survey of how many people are experiencing problems or what proportion are caused by particular forms of gambling. However, the fact that in 2007 the highest number of people calling GamCare had cited problems related to betting shows that even 'a little flutter' on horses or dog racing has the potential to lead to problem gambling. So whilst the continuous, asocial and repetitive nature of fruit machine or online gambling may pose particular dangers, other forms of gambling cannot just be dismissed as harmless fun.

State of the Industry

According to a report by the Gambling Commission², the gambling industry had a turnover of more than £84 billion in 2006/07. Gross Gambling Yield (the amount retained by the gambling operator after the payment of winnings but before the costs of the operation) was £9.9 billion, about a quarter of which was generated by the National Lottery.

Betting

There are around 8,800 betting shops and the sector employs around 43,000 people (full-time equivalents (FTE)). Gross profit from gaming machines in betting shops stood at £1,138 million in 2008/09.

Bingo

641 bingo clubs were in operation in March 2009, down from 675 a year previously. The sector employs around 14,000 (FTE). Gross profit from gaming machines found in bingo clubs was £214 million.

Casinos

143 casinos were open in March 2009. All of these were licensed before the Gambling Act 2005 came into force. The Gambling Act allows for 16 new casinos to open – none have yet done so. The sector employs approximately 13,000 people (FTE). Gross profit from gaming machines in casinos was £120.5 million.

Gaming Machine Arcades

There are approximately 630 Adult Gaming Centres and 320 Family Entertainment Centres in operation, employing around 15,000 people (FTE). Gross profit from gaming machines in Adult Gaming Centres was £397 million, and in Family Entertainment Centres, £92 million.

The most prevalent type of Gaming Machine is Category C, which is commonly found in pubs (and has a maximum prize of £70). There are an estimated 121,000 Category C machines in operation.

² Gambling Commission – Industry Statistics 2008-09

2. GAMBLING POLICY

A. Government Policy

The Government department responsible for gambling is the Department for Culture Media and Sport (DCMS). www.culture.gov.uk

The current (September 2009) Secretary of State is Ben Bradshaw, and the Minister of Sport is Gerry Sutcliffe. Gambling issues also affect other areas of policy, including Health, Education, Taxation, Local Government, Employment and Business.

The Government's policy is based around three main objectives (the licensing objectives) set out in the Gambling Act 2005, which are:

- (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
- (b) ensuring that gambling is conducted in a fair and open way, and
- (c) protecting children and other vulnerable persons from being harmed or exploited by gambling.

Three of the most controversial gambling policy areas in relation to objective (c) are the internet, advertising and casinos:

Internet

An increasing number of households have access to the internet, which includes a wide range of opportunities to gamble online. The Gambling Act 2005 made it legal for online gambling companies to operate from UK territory.

The Government saw two advantages to this. The first was to encourage a growing business sector and the second was so that UK-based operations have to be regulated by the Gambling Commission, with strict emphasis on player protection and crime-free gambling.

The Salvation Army and the Methodist Church have concerns about the rise in Internet gambling. Anyone anywhere can access the sites, wherever the operations are located, meaning it is impossible to ban them altogether. We therefore believe that it is better for online sites to be located in jurisdictions where they are well regulated, such as by the Gambling Commission here in the UK, than for them to be based in countries where standards, especially standards of social responsibility, may not be as strict.

The Royal College of Psychiatrists published a report in August 2007 setting out some serious concerns about the implementation of the Gambling Act, and in particular the impact of internet gambling on vulnerable people. See www.rcpsych.ac.uk/pdf/Sub%20Aug%2007.pdf

Advertising

September 2007 saw the opening up of advertising opportunities to gambling operators. In the past only the National Lottery and Bingo (perceived to be softer

forms of gambling) were allowed. Now casinos, bookmakers and other forms of gambling are allowed to advertise. Their advertisements are controlled by a Code of Conduct for advertising gambling activities³. Anyone can complain about an advertisement they see that they think breaches the code. TV advertisements are restricted to a 9pm watershed.

The Government believes that as society has generally become more accepting of gambling, it is not right that this sector should be singled out as not being allowed to advertise. Critics accuse the Government of double-standards as they liberalise one area of life, but crack down on another (smoking), which is becoming more socially unacceptable.

Churches and other faith groups have expressed deep concern that allowing advertising will lead to an increase in problem gambling. Advertising will stimulate a growth in gambling and a normalisation of it. As gambling levels rise and social acceptability increases, we believe problems are also likely to increase. The Gambling Act 2005 contains new measures designed to lower the risk of this happening, but the effects of these have yet to be tested. At the very least, we believe advertising should not be allowed until the other liberalisations of the Act – and their effects on problem gambling – have been measured. In response to concerns about advertising and problem gambling the industry has agreed to remove gambling operators' logos from sports replica kits in children's sizes, and in other advertising, to display a web address for a website with information about gambling (www.gambleaware.co.uk) and sources of help for those affected by problem gambling – in a similar way that the drinks industry runs www.drinkaware.co.uk.

Casinos

The Gambling Act 2005 originally allowed the construction of 17 new casinos – eight small, eight large and one regional casino (also known as the supercasino or megacasino). This is in addition to the casinos already operating under previous legislation.

The Government believes that new casinos will bring investment and regeneration potential to deprived areas. Critics, including the churches, have questioned the regeneration properties of casinos, especially when viewed with the possibility that they will cause an increase in gambling problems amongst the poorer communities in which the casinos are located.

The regional casino has caused a great deal of controversy and debate in the media and in Parliament. In 2007 Manchester won the bid to develop the large-scale gambling resort and to become the location for the supercasino. However, following a defeat on the issue in the House of Lords, the Government indicated that they will not press forward with the supercasino. It has been subject to speculation that Gordon Brown's personal attitude to gambling may have been a role to play in this decision. The 16 smaller casinos will still go ahead in towns and cities across the UK.

³ See page 26, below.

Licensing Authorities role

A new role for local authorities (local councils) in licensing gambling premises has come about because of the Gambling Act 2005, similar to the changes in alcohol licensing. Your local council should have produced a local gambling policy, and must review this policy every three years. This policy should be publicly available from your local authority licensing department.

Local councils have the power to pass a 'no casino' resolution as part of their gambling policy, which would mean that they do not wish to have one of the casinos allowed under the new laws. This resolution would be in force for the three years that the policy is current.

B. The Gambling Act 2005

The Gambling Act 2005 was introduced following a major review of gambling legislation in 2001 (the Budd Review). The Act overhauled most of the gambling laws, and it is based around the three licensing objectives – (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime, (b) ensuring that gambling is conducted in a fair and open way, and (c) protecting children and other vulnerable persons from being harmed or exploited by gambling. The Act also established a new Gambling Commission to regulate the industry. Measures were included to put social responsibility and protection at the heart of the legislation, whilst at the same time there are provisions to increase the number of opportunities for, and ease of, gambling.

Some key changes include:

- The removal of low-value fruit machines from areas such as takeaways and minicab offices
- The setting up of the Gambling Commission
- Allowing 17 new casinos – 8 small, 8 large and 1 regional or megacasino
- In the Regional Casino, allowing up to 1,250 unlimited jackpot gaming machines
- Powers for Local Authorities to veto the building of a new casino in their area
- Liberalising the advertising restrictions on gambling operators

During the passage of the Gambling Bill, the Methodist Church and The Salvation Army mounted a high-profile campaign, supported by many other churches, which centred around the need to include more provisions for socially responsible gambling. The campaign was successful, in that the Act:

- Limited the number of regional casinos to just one, and large and small casinos to 8 each (after initial suggestions for an unlimited number)
- Limited the number of Category A unlimited jackpot machines from an unlimited number to a maximum of 1,250 for all types of machine in the regional casino
- Removed Category D (low-value) machines from takeaways and minicab offices.

The Churches' campaign also called for children to be banned from gambling on gaming machines, such as low-value fruit machines. Whilst these will no longer be found in fish

and chip shops and similar premises, children will still be able to play on them in Family Entertainment Centres (such as seaside amusement arcades), and they will still be in licensed premises (such as pubs). This means that Britain is still the only Western country that allows children to gamble.

C. The Gambling Commission

The Gambling Commission (www.gamblingcommission.gov.uk) is the new gambling regulator set up by the Gambling Act 2005. It began working in October 2005, and replaced the Gaming Board for Great Britain. It operates at arms-length from Government, and its advice is independent. It is largely funded by fees paid by the gambling industry.

The work of the Gambling Commission is based on the licensing objectives that were at the heart of the Gambling Act:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
- ensuring that gambling is conducted in a fair and open way, and
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

The Gambling Commission regulates all commercial gambling in Great Britain, apart from spread betting (Financial Services Authority) and the National Lottery (National Lottery Commission). This includes betting (e.g. on horseracing), bingo, casinos, lotteries, pools and gaming machines. It also regulates British-based remote gambling companies.

The Gambling Commission issues new operating licences under the 2005 Act to organisations and individuals providing facilities for gambling, and personal licences to certain categories of people working in the gambling industry. The Commission has specified conditions under which these licences are granted, and has also issued codes of practice for the provision and management of gambling facilities.

The Commission has legal powers to monitor licence holders and can levy fines or revoke licences. It will investigate and prosecute illegal gambling under the Gambling Act 2005. The Commission has also issued mandatory codes of conduct on socially responsible gambling, which operators are required to abide by, or face fines or loss of licence.

The Gambling Commission is the Government's principal advisory body for issues relating to gambling. It is formally tasked with advising the Secretary of State for Culture, Media and Sport on the incidence and nature of gambling and its impact.

As well as informing central government policy, it is also responsible for advising local licensing authorities on how they exercise their functions under the Gambling Act. The Commission says it will follow international best practice and its approach will be risk-based, transparent, proportionate and consistent.

3. INDUSTRY RESPONSE

Tripartite Structure

In June 2009 a new tripartite structure was established to help fund and prioritise spending around problem gambling issues.

1. The **Responsible Gambling Strategy Board** (www.gamblingcommission.gov.uk/gh-strategy_board.aspx) aims to advise the Gambling Commission on the priorities for problem gambling research, education and treatment. The RGSB is chaired by Lib Dem peer Baroness Julia Neuberger.
2. The **Gambling Research, Education and Treatment Foundation** (www.thegreatfoundation.org.uk) was formerly known as the Responsibility in Gambling Trust. The GREaT is an industry organisation which aims to raise money to help fund research into, education about and treatment to help problem gamblers. The GREaT Foundation is funded by voluntary contributions from the gambling industry. They have a target of £5 million to be raised in 2009/10, rising to £7 million per year by 2010/11. If the Government believes that the industry is not contributing enough to problem gambling treatment, prevention and research they have the power to impose a compulsory levy.

GREaT owns and manages the www.gambleaware.co.uk website, providing advice and information about gambling and sources of help for those affected by problem gambling.

GREaT's predecessor, the Responsibility in Gambling Trust, produced education materials for young people in association with Tacade. For more information see section 8B, below, or visit www.tacade.com

3. The **Responsible Gambling Fund** (www.rgfund.org.uk) was set up in June 2009 to distribute funds for gambling research, education and treatment, in line with the priorities and recommendations established by the RGSB.

Other Industry involvement

Most categories of gambling operators have industry associations which represent the businesses, for example NCIF (the National Casino Industry Forum) or BACTA (the British Amusement Catering Trade Association). They have also been involved in consultations with the Government on implementing the Gambling Act 2005. New codes of conduct and standards of operation in line with the Act's licensing objectives will be introduced across all levels of gambling business by the Gambling Commission.

Some gambling operators, such as casinos, may facilitate local social responsibility forums to discuss problem gambling issues in the local community. These may include community and faith group representatives. Other operators may help to fund local treatment or support services.

4. TYPES OF GAMBLING

A. Raffles / Tombolas

Many Churchgoers will have come across raffles or tombolas at fetes and fund-raising events. A number of prizes are purchased or donated. Numbered tickets are sold, and corresponding tickets are placed in a box or tombola. Once the tickets have been sold, a random draw is made, with the winner being the person holding a ticket with a matching number.

Under the law, these kind of draws are classified as 'non-commercial lotteries', and are subject to the following restrictions:

1. The amounts deducted from the proceeds of the lottery in respect of (a) the cost of prizes, and (b) the costs incurred in organising the lottery must not exceed the sums prescribed by the Secretary of State – currently set at £500 and £100;
2. The lottery must be promoted wholly for a purpose other than private gain;
3. No rollovers are allowed;
4. Tickets may only be sold on the premises on which the event is taking place, and while the event itself is in progress.
5. The result of the lottery must be made public while the event is taking place.

Despite being governed by these rules, raffles are unregulated and you do not need to apply for a licence.

Other non-commercial betting and gaming for fundraising purposes, such as bingo nights or wheel of fortune games, are allowed under the Act, subject to conditions.

B. The National Lottery

The National Lottery was first drawn in November 1994. It is now the single most popular gambling activity in the UK. The National Lottery was established by an Act of Parliament, and is regulated by the National Lottery Commission (www.natlotcomm.gov.uk), which aims to ensure that:

- players are treated fairly;
- that the nation's interest in the lottery is protected; and
- that the operator is motivated to maximise the enjoyment and benefits that the lottery brings to the nation

The National Lottery can be played by anyone over the age of 16 years old (unlike most other forms of gambling, where the age restriction is over-18s). The National Lottery Commission awards the licence to run the lottery. The current operator is Camelot, and the current licence runs from 2009-2019. To date over £23 billion has been raised for good causes, and £34 billion has been given in prizes.

The National Lottery has developed to include several different games. As well as the main Lotto draws on Wednesdays and Saturdays, there are games such as Dream Number (raising funds for the 2012 Olympic Games in London), Euromillions, Thunderball, Daily Play, Lotto Hot Picks and Scratchcards / Instant Win Games.

The lottery is played by purchasing a ticket at a retail outlet, such as a high street newsagent or supermarket. Numbers are selected and a ticket is printed. Once the draw has been made, people with the winning tickets can claim their prize. The odds of winning the Lotto draw jackpot are 1 in 13,983,816. Jackpot prizes can reach several millions of pounds. If the jackpot is not won, the prize value can rollover to the following draw, meaning a greater jackpot. In 2006 the Euromillions draw rolled over several weeks, until the jackpot stood at over £120 million, and created some considerable media attention. Smaller prizes are on offer: matching three numbers out of six will result in £10 (odds of 1 in 57).

Scratchcards can also be purchased at retail outlets. A hidden combination is revealed by scratching away a removable coating on the card. If the combination of numbers or symbols is right, the card is a winning ticket.

Lottery tickets and scratchcards can be purchased on the internet.

C. Other Lotteries

Private lotteries

Private Lotteries, such as holding a raffle at your workplace or club are allowed under the law. They are only open to members of the workplace or club, and are not open to the public. There is no need to get a licence, and there is no limit on the size of the lottery. The lottery must be promoted by someone within the company or club, and only advertised on the premises. Tickets must state the price, the name and address of the promoter and who is eligible to participate. Private lotteries are not regulated.

Public lotteries

Larger raffles open to the public are also permissible under UK law. Public Lotteries must be registered with the local authority, and if ticket sales exceed £20,000 for each draw or £250,000 in the course of a year then the lottery must be registered with the Gambling Commission.

D. Premium Bonds

Premium Bonds are a form of financial investment run by National Savings & Investments, an Executive Agency of the Chancellor of the Exchequer.

People purchase premium bonds are entered into a monthly prize draw, with the top prize being £1 million, along with several smaller prizes. The winning bonds are selected randomly by a computer. The first draw was made in 1957. The minimum number of premium bonds that an individual can hold is £100, and the maximum is £30,000.

Holders of premium bonds can reclaim their investment at any time. Some people do not consider premium bonds to be true gambling as no stake is involved.

E. Pools

In pools betting, players 'pool' their stakes, and the combined sum, less what the operator takes out, is divided between the winning participants. The level of dividends depends on the size of the pool and the number of winning participants.

The most common betting pool in Britain is the football pools, with weekly and monthly competitions based on the results of football matches. The most points are awarded for score-draws (3 points), then no-score draws (2 points), then a win (1 point).

Football pools coupons are sold door-to-door, at retail outlets, by post and online. Football pools are the only form of betting that can be sold in ordinary shops, apart from the National Lottery.

The average amount players spend on football pools per week is £3.00. Over 90% of players spend less than £5.00.

Football Pools can be played by anyone over the age of 16 (unlike most other forms of gambling, where the age restriction is over-18).

F. Bingo

Bingo is a game of chance. In return for a stake, players receive a card with a set of numbers and mark them off their cards as the numbers are randomly drawn. Players win as they complete a line, multiple line or a complete card (full house). There are over 650 bingo clubs in Britain. Bingo also takes place in over 1,000 clubs and other smaller institutions, such as working men's and British Legion clubs and miners' institutes. Players spend on average between £15-20 per night.⁴ Bingo is the only gambling activity more popular with women than men.

G. Betting on racing and other events

A bet is a gamble in which money is staked on the outcome of an unpredictable event, such as races, sporting events, political election results or on the likelihood of something happening (for example, if there will be a white Christmas). A bet is essentially an agreement between two people, usually a player and a bookmaker.

Types of bets include "win" bets, "place" bets (such as betting that a horse will finish in the first three), "each way" bets (a combination of a win and a place bet), "forecast" bets (which require finishers to be nominated in the correct order) and "multiple" bets (predicting the outcome of a series of events, with winnings from the first becoming the stake for the second, and so on).

People can bet "on-course", which takes place at racecourses. There are 59 horse racecourses and 31 greyhound tracks in Britain. "Off-course" betting mainly takes place in licensed betting offices, of which there are around 8,800.

Recently, "remote" betting has developed to allow people to place bets through the internet, interactive TV or via mobile phones.

Bookmakers will set odds based on the predicted likelihood of an event happening – if something is very unlikely to happen, then the odds will be very long – though it means a large prize if what has been bet actually comes to pass.

⁴ Gambling Review Report (the Budd Review), Department for Culture, Media and Sport, 2000

Betting exchanges are places where gamblers are in effect betting against each other - it works in a similar way to the stock market. Here the operator provides the technology (usually a website) to allow customers to stake money against each other on the outcome of an event, such as a sports match. The operator acts as the bookmaker for betting exchange customers for regulatory purposes.

H. TV Shows

There has been a recent increase in the number of quiz prize TV-shows that have been criticised by politicians for being too much like gambling. The games in question might typically involve a question with a multiple choice answer. Viewers are encouraged to dial a premium-rate telephone number to enter a draw to be the person to answer the question. If selected, and the person gets the answer correct, they win a cash prize. Other cash prize games, including text a correct answer to be entered into a prize-draw, are also offered.

Critics of these shows say that they act as a lottery – in that people paying a premium rate number are staking money on winning the draw to be given the chance to answer the question. The regulator for these programmes is PhonepayPlus– the premium rate services regulator (www.phonepayplus.org.uk). MPs and others have said that these programmes need to include on-screen, real-time statistics about the number of callers and the chance of winning. As they are effectively a lottery, they should be required to donate a proportion of their money to good causes.

The producers of these programmes argue that they are not lotteries as there is an element of skill involved (correctly answering the question). There is also a free-entry route available through the TV show's website.

In 2007 it was revealed that some TV game shows like this were keeping the phone lines open whilst having already determined who would be eligible for a prize. This caused a scandal and some high-level resignations in the TV industry. Further to that, many media organisations tightened up their internal rules and regulations regarding the running of such competitions.

TV channel five introduced a late-night gambling service on its interactive platform in autumn 2009. Customers are able to place bets in a similar way to playing on a computer through their television.

I. Gaming in Pubs and Clubs

From September 2007 some forms of gaming has been allowed in pubs and clubs without being licensed, although certain conditions have been set as to what these games are and limits on stakes and prizes. These games have to be 'equal-chance' games, such as poker, backgammon or mah-jong.

J. Equal-Chance Tournaments

One of the changes of the Gambling Act 2005 is to allow permission for a gambling operator to run gambling events in a location without a gambling premises licence; these are called Temporary Use Notices. From September 2007 equal chance gaming

tournaments will be permitted, subject to certain conditions. It is not the intention that Temporary Use Notices can be used to run casino games or gaming machines.

K. Casinos

Under the current legislation, there are around 140 casinos. The Gambling Act theoretically allows 17 new casinos to open – 8 “small”, 8 “large” and one “regional” casino. In reality, the new small casinos will be of a comparable size to many existing casinos. Plans for the regional casino were eventually dropped. None of the new casinos have yet opened.

Casinos offer games played on tables, such as roulette, cards and dice. They also offer gaming machines with higher value stakes; the highest value machines can only be played in casinos (see below for more information on gaming machines).

Many casino table games are now available online through gaming websites. Poker and other card games are particularly popular.

L. Gaming machines

A mechanical device on which gambling can take place on is described as a gaming machine. Most gaming machines are “reel-based”, with the object of the game to match symbols on rotating wheels. These are generically known as fruit-machines, as often the symbols include pictures of fruit. Other types of gaming machines include “pushers” (or ‘penny-falls’), where players insert small value coins into a slot, with the aim of dislodging a pile of coins in the machine. A moving wall ‘pushes’ the coins into the pile – a coin in the right place will push many other coins over the edge and into the winning tray. Crane grab machines are also a variety of gaming machine. Players use controls to direct a crane in an attempt to pick up a prize (such as a small toy).

Under the current law three types of gaming machine are allowed:

Club or jackpot (Category B) machines are sited in casinos (with the maximum jackpot allowed of £4000, and a maximum stake of £2), bingo clubs (jackpot limit of £500, stake 50p) and other clubs (jackpot up to £250, stake 50p).

‘All-cash’ (Category C) machines in adult environments such as pubs, betting shops, bingo clubs and adult amusement arcades. The maximum prize is £70, the maximum stake is £1. These limits were controversially doubled in 2009, despite criticism from church and medical groups about the dangers of problem gambling.

‘Cash-token’ (Category D) machines in premises such as seaside family arcades, and licensed premises. The maximum prize is £5 cash (or £30 non-cash value), and the maximum stake is 50p (or £1 for non-cash prizes). Under the Gambling Act 2005 machines in areas accessible by children, such as minicab offices, fish and chip shops, takeaway restaurants and guesthouses were phased out.

Category D machines can be played by children. The churches have argued that this gives the message that fruit machines are harmless, when they are one of the most addictive forms of gambling.

There are around 235,000 gaming machines in Britain, of which approximately 25,000 are club or jackpot machines.

The solitary and repetitive nature of gaming machines can make them addictive, and they are often cited as a cause of problem gambling.

M. Fixed Odds Betting Terminals

Fixed Odds Betting Terminals (FOBTs) are a type of Category B gaming machine most commonly found in betting shops. They are computers that offer fixed odds betting, such as roulette games. FOBTs have a maximum stake of £10 per bet and £100 per transaction (if playing roulette, putting bets down on several numbers). The maximum payout per transaction is £500.

FOBT games can be played repetitively, and they do not have any interactions with other people, and so they are also a risky form of gambling.

N. Remote betting and gambling

Online gaming and betting has increased in recent years with the rise of the internet. People can now also place bets through mobile phones and interactive TV. Together, these activities are known as 'remote' gambling, because the player is removed from a gambling premises.

The Gambling Act 2005 changed the law so it was possible for remote gambling facilities to be based in the UK. Despite this, many online casino and betting operators are based offshore in places such as Alderney and Gibraltar, where the regulatory regime is less onerous and there are significant tax benefits for the companies. British residents can access overseas sites, though there are restrictions on advertising if the company is based outside the European Economic Area or the UK Government's 'Whitelist' of approved jurisdictions which have regulatory regimes that they are satisfied are robust.

When the Gambling Act 2005 comes into force in September 2007, operators will be able to provide remote facilities from equipment based in the UK.

The Government has been working on trying to set up international standards for the regulation of remote gaming operators.

Internet gambling hit the headlines in 2006 when the United States of America passed a law intended to prevent US citizens from gambling online by making it illegal for US banks and credit card companies to settle bills incurred on online gambling sites.

O. Spread Betting

Financial Spread Betting is a complicated system whereby people bet on the changes in share prices on the stock market, and on the difference (or spread) between the broker's buying and selling prices. Bets are placed as to whether the stock will go up or down. Like normal stock trading, there is a risk that prices will go down as well as up. However, the nature of spread betting and the potential to lose (or win) large amounts of money

and the fact that there if someone wins someone else has lost means that this is a specialised form of gambling. Most people who are involved in spread betting know the risks and what they are doing, as it is a complex and intricate area of financial dealing. Spread Betting is governed by the Financial Services Authority rather than the Gambling Commission. www.fsa.gov.uk

The potential to lose huge sums of money through spread betting is particularly worrying. The Church of Scotland has raised particular concerns about spread betting.

5. CHRISTIAN REFLECTIONS ON GAMBLING AND PROBLEM GAMBLING

The urge to gamble is so universal and its practice is so pleasurable, that I assume it must be evil. ~ Heywood Hale Broun

Christians are often accused of being kill-joys: if anything is fun or pleasurable, Christians must be against it! Heywood Broun's statement about gambling sums it up – In his view, gambling is pleasurable, therefore it must be wrong. But is it that simple?

Christians are instructed to be joyful;

'Be joyful always.' *1 Thessalonians 5:16*

to focus on positive things;

'...whatever is true, whatever is noble, whatever is right, whatever is pure, whatever is lovely, whatever is admirable—if anything is excellent or praiseworthy—think about such things.' *Philippians 4:8*

and to acknowledge God as the giver of every good thing.

'Every good and perfect gift is from above, coming down from the Father of the heavenly lights...' *James 1:17*

So Christians are not meant to be messengers of doom who avoid pleasure at all cost, in fact, they are to enjoy God's gifts and to fill their minds with good things. The real question is not, 'are Christians to avoid pleasure?', but 'does gambling bring the kind of pleasure Christians should pursue?'

Let's be clear – there is no commandment that reads 'Thou shalt not gamble'. However, it would be wrong to say that the Bible offers no insight into the issue.

There are over 2000 verses in the Bible that make reference to poverty. These verses implore followers of God to oppose injustice and to stand up for the poor and oppressed. While there are so many people in need in the world, each of us must consider our spending in every area of life very carefully. Spending money and time on gambling, just like all other forms of expenditure, must be considered in the light of the requirement of good stewardship of resources.

With few exceptions, gambling is built upon the premise that many must lose in order for a few to win. It therefore appeals to two of humanity's least appealing characteristics – selfishness and greed. The gambler not only desires to win but in doing so, knowingly or unknowingly, desires that others lose. This does not sit well with Jesus' words; 'Do to others as you would have them do to you.' (*Luke 6:31*)

There are hundreds of thousands of people in the UK whose lives are negatively affected by gambling. There are the problem gamblers themselves, whose experiences range in severity, but can lead to physical illness, depression, aggressive behaviour, deceit, family

breakdown, criminal activity, loss of employment and, in extreme cases, even suicide. Then there are all those whose lives are affected as a result; families, friends, employers, the list goes on. While many people who gamble do so without experiencing problems, for a significant number of people, gambling is life-destroying. Christians must prayerfully reflect upon the appropriateness of involvement in any activities which can have such powerfully negative consequences for others. Christians are sometimes called upon to sacrifice their own freedoms for the sake of others who are more susceptible to harm from engagement in activities which, to quote the Apostle Paul, may well be permissible but are not necessarily beneficial or constructive. (See 1 Corinthians 10:23-33)

Some Christians also note that the Bible makes a connection between work and material reward and believe that pursuing something for nothing is contrary to God's design for humanity's role on earth.

Christians undoubtedly reach differing conclusions as to the appropriateness of different ways of spending time and money and gambling is no exception. It is therefore important not to judge the decisions and actions of others. However, generally speaking, Christian groups in the UK have opposed measures to expand gambling opportunities, believing that any increase could well lead to rising numbers of people experiencing problems and seeing their own lives, and those of others connected to them, being damaged.

6. CHRISTIAN ORGANISATIONS' POLICY ON GAMBLING

| Organisation | Views on Gambling | Raffles / Tombolas | Lottery Funding | Further Information |
|--|--|--|--|---|
| Baptist Union of Great Britain | Formal resolution of concern about the National Lottery (1996). Encouraged campaigning against the spread of casinos. | Permitted with the agreement of the local congregation | Permitted with the agreement of the local congregation | www.baptist.org.uk |
| CARE | Concerned about impact of problem gambling on families. Interest in internet gambling | No public position | Does not support applications for lottery funding | www.care.org.uk |
| Church of England | See <i>Gambling or Gaming – Entertainment or Exploitation?</i> Policy Statement from Ethical Investment Advisory Group, 2003 | Permitted for fundraising purposes | Applications permitted for fundraising for maintenance and repair of historic buildings | www.cofe.anglican.org/info/ethical/policystatements/gambling.pdf |
| Church of Scotland | See 2007 General Assembly Report on Gambling | Officially not permitted. | Applications allowed under certain circumstances with the agreement of the local congregation and the presbytery | www.churchofscotland.org.uk/news/nrga260407.htm |
| Evangelical Alliance | Campaigned against casino expansion and liberalisation of gambling laws | No public position | No public position. Provides information on how to apply for heritage lottery funding. | www.eauk.org/index.cfm |
| Methodist Church | See Conference Statements on Gambling, 1992, and the National Lottery, 1999. Major campaign around the Gambling Act 2005 and subsequent engagement with Government. | Permitted with the agreement of the local Church Council. No cash prizes. Money spent on prizes limited to £50 | Permitted with the agreement of the local Church Council | www.methodist.org.uk/index.cfm?fuseaction=opentoworld.index |
| Quakers (Society of Friends) | Public statements on the National Lottery in 1994 and 2004 re-affirmed Quaker testimony against gambling. Concerns about problem gambling and treatment expressed through Quaker Action on Alcohol and Drugs | Raffles not used for fund-raising. | No applications permitted for lottery funding for any aspect of central work | www.qaad.org.uk |
| The Salvation Army in the United Kingdom and Republic of Ireland | Major campaign around the Gambling Act 2005 and subsequent engagement with Government. | Not permitted. If in aid of charity, members are encouraged to make a donation instead. | No applications permitted for lottery funding for any aspect of central work | http://www1.salvationarmy.org.uk/uki/www_uki.nsf/vw-dynamic-arrays/923D0638464E68528025710D0049FD72?openDocument |
| United Reformed Church | Concern that gambling may become addictive, driving people into poverty | Permitted for fundraising purposes at the decision of the local church | Applications permitted with the agreement of the local church for upkeep and repair of listed buildings | www.urc.org.uk |

7. WHO ELSE IS INVOLVED?

A. Care Service Providers

GamCare www.gamcare.org.uk 0845 6000 133

GamCare is a registered charity and is the largest provider of care services for problem gambling in the UK. They run a freephone helpline between 8am and midnight every day, and a website, as well as providing some face-to-face counselling. They are largely funded by the Responsible Gambling Fund. On policy matters they do not advocate for more or fewer opportunities to gamble, but instead focus on a promotion of responsible gambling.

Gordon House Association www.gordonhouse.org.uk 01384 241292

Gordon House Association provides specialist residential care for people with a severe addiction to gambling, as well as web-based support and counselling service. Gordon House was formerly known as the Gordon Moody Association, named after the Methodist minister who set up the organisation, the Revd Gordon Moody.

Other initiatives

There are many local self-help and 12-step groups around the country.

Gamblers Anonymous is for people who have a problem with their gambling.

www.gamblersanonymous.org.uk 020 7384 3040

GamAnon is for the family and friends of people whose gambling problem is affecting their relationships.

www.gamanon.org.uk 08700 50 88 80

Other organisations can provide advice on debt counselling and setting budgets so financial management can be easier. Citizens Advice should be able to assist.

www.citizensadvice.org.uk

B. Regulators

Advertising Standards Authority www.asa.org.uk 020 7492 2222

The ASA monitors advertisements and responds to complaints from members of the public and industry about adverts that they consider to be misleading, harmful or offensive. The ASA administers the Code of Practice laid down by the Committee of Advertising Practice and the Broadcast Committee of Advertising Practice on gambling advertising. The ASA will use the code to determine whether a particular advertisement should be removed.

Financial Services Authority www.fsa.gov.uk

The FSA regulates financial spread betting.

Gambling Commission www.gamblingcommission.gov.uk 0121 230 6666

The Gambling Commission regulates all UK gambling, except the National Lottery and spread betting. It issues personal licences and operating licences to individuals and companies involved in the gambling sector. It has the power to impose fines and revoke licences if strict licence conditions and codes of social responsibility are breached. The

Commission also conducts the three-yearly Gambling Prevalence Study which shows trends in gambling play as well as the rate of problem gambling. The evidence from this study is used to help make policy recommendations.

PhonepayPlus www.phonepayplus.org.uk

PhonepayPlus is the premium telephone rate regulator, and has an interest in the controversy surrounding play-TV shows.

National Lottery Commission www.natlottcomm.gov.uk

The National Lottery Commission exists to ensure that players are treated fairly, to protect the nation's interest in the lottery and to maximise the enjoyment and benefits that the lottery brings to the nation. Amongst other things the NLC awards the lottery operating licence and commissions research into who plays the lottery and why.

The Department for Culture, Media and Sport www.dcms.gov.uk

The DCMS is the Government department that deals with gambling issues, coming within the Sport portfolio.

Local Authorities

Local authorities issue premises licences to gambling businesses within their area. Local councils are also required to produce a gambling licensing policy that supports the three licensing objectives.

C. Research

A number of UK Universities conduct research into gambling and problem gambling, including Nottingham Trent, Salford, Birmingham, Lancaster, Glasgow and Goldsmiths College.

The **Responsible Gambling Fund** is Britain's main funder of research into treatment, prevention and policy regarding problem gambling. www.rgfund.org.uk

The Society for the Study of Gambling is a forum for those concerned with research into gambling. It brings together academics, policy makers, industry representatives and those concerned with problem gambling. www.societystudygambling.co.uk

D. Campaigns

Often local campaign groups will come together to oppose plans for a new casino or other gambling premises in their town.

8. WHAT CAN YOU DO?

A. Personal Conduct – If you gamble, think about it!

Consider seriously the issues and challenges that gambling presents to our society, and how this should affect your own personal conduct.

Different church traditions will have different approaches to gambling, and even within them there may be variations about individual conduct. These could range from:

- Abstaining from all gambling activity
- Participating only in minor forms of gambling
- If you do choose to gamble, doing so responsibly, within your means, and being aware of the dangers.

Other points you could consider include:

- Giving support wherever possible by appropriate means to those who suffer directly or indirectly from problem gambling.
- Uniting with other churches and faith groups to support pressure on government and public opinion for a programme designed to control gambling proliferation and reduce harm.
- Recognising the importance of example and education in influencing those around you.
- If you abstain from all gambling activity take special care to avoid judgemental attitudes which may be counter-productive.
- If you choose to gamble responsibly take special care to demonstrate that this requires self-control.

If you gamble, do so responsibly. This means:

- Deciding how much money you will stake in a particular session before you start - only stake money that you can afford to lose.
- Not chasing your losses hoping to make up money that has gone.
- Knowing the rules of the game and the statistical chance of winning.
- Taking special care if gambling when under the influence of alcohol or drugs, or if you are tired, as this can alter your perception of risk and affect your judgement.

B. Education

We all have a responsibility to raise awareness of the risks of gambling and about where people with a gambling problem can get help and support. This document, *Against the odds...?*, provides some information about the subject. There are other places where you can find special educational resources which cover this subject more thoroughly and have been prepared with specific target audiences in mind.

Parents

If you are responsible for children or young people you will know the importance of example and encouragement in family life. Your role is crucial in teaching young people the dangers associated with gambling, and how to exercise responsibility in their personal life and financial management.

Youth Workers

You could run a youth club session on problem gambling, or you might know of young people who could be at risk of developing a gambling problem. Tacade have produced in depth and detailed resources that can be used in youth clubs, voluntary organisations, schools as well as healthcare facilities and the criminal justice system. *You Bet!* (for 11-16 years) and *Just Another Game?* (13-19 years) are available free. Call 0161 836 6850 or visit www.tacade.com

Teachers

Citizenship lessons or Personal, Social and Health Education curriculum can include topics related to gambling and problem gambling. The Tacade resources *You Bet!* and *Just Another Game?* will also be useful. Call 0161 836 6850 or visit www.tacade.com

Preachers

If you hold a preaching role within your church, you could focus a sermon or other teaching on gambling or wider social issues.

C. Licensing

Advice on how to respond to local licence applications

Local authorities have new powers under the Gambling Act to regulate gambling activity by issuing premises licences to gambling businesses within their area. Licences should only be granted to businesses where the premises matches criteria set out in the local authority's gambling licensing policy (which is available from your council's licensing team), which has to be based on the three licensing objectives:

- (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- (b) ensuring that gambling is conducted in a fair and open way; and
- (c) protecting children and other vulnerable persons from being harmed or exploited by gambling.

You have the right to ask for an existing premises licence to be reviewed, or for a new premises licence not to be granted if you believe that the licence in question would breach one of these objectives.

Local Gambling Licensing Policy

Every local authority has to produce a three-yearly gambling licensing policy. The local authority should consult widely with interested parties when drawing up the policy. Faith groups may already be consulted by the licensing authority, but if not, contact your licensing authority asking for this to be done.

Useful evidence to cite is paragraph 6.24 of the Gambling Commission's Guidance, which refers to the entitlement of business interests to be an interested party, and states:

It is expected that 'have business interests' will be given the widest possible interpretation including partnerships, charities, faith groups and medical practices.

If you live very close to the gambling premises you may also be classed as an interested party, and therefore entitled to make personal representations.

Responding to Premises Licences Applications

If you have concerns about new premises licences, or would like to make representations about existing premises licences that you think is breaking one of the licensing objectives, you may be able to lodge an objection. Your local council's licensing department should be able to advise you how this can be done. Visit your local council website or contact their offices for more information.

You may be able to lodge an objection if:

- the gambling premises is near a school or other centre for children / young people
- it is near a centre for vulnerable adults – for example, people suffering from other addictions, poor mental health or other problems
- the premises fail to abide by Gambling Commission guidelines or codes of practice.

If you want to make representations about a local gambling premises licence to your Licensing Authority, see the Appendix for advice and information.

Casinos: Local Authority Licensing Policy – No Casinos Resolution

Section 166 of the Gambling Act allows local authorities to resolve not to grant an application for a casino licence and you may want to campaign for this. This only covers the new-style casinos created under the 2005 Gambling Act, and is in force for the subsequent three years. Some local authorities are as yet undecided on the issue and your campaign may help them in their decision-making. You could ask the council to pass a No Casino resolution, and make this the focus of a campaign.

New Casinos

16 locations across the UK will see new casinos in the next few years. These casinos have been created by the 2005 Gambling Act, and will be larger than most pre-existing casinos. There will be 8 'small' and 8 'large' casinos. Although none have yet opened, the geographical distribution has been agreed. The small casinos will have a minimum customer area of 750m² will be in Bath and North East Somerset, Dumfries and Galloway, East Lindsey, Luton, Scarborough, Swansea, Torbay and Wolverhampton. The large casinos will have a minimum customer area of 1500m² and will be in Great Yarmouth, Kingston-upon-Hull, Leeds, Middlesbrough, Milton Keynes, Newham, Solihull and Southampton.

What can I do?

If you live in one of the above local authority areas see Appendix B for further action you can take.

D. Advertising

If you think an advert for gambling products (or, indeed, any ad) could cause harm, offence or mislead the reader, you can register a complaint with the Advertising Standards Authority.

The ASA works with guidelines produced by the Committee of Advertising Practice and the Broadcast Committee of Advertising Practice. CAP and BCAP have written advertising codes for gambling, following widespread consultation.

You can read the advertising codes online at www.asa.org.uk/asa/codes

If you see or hear an advert that you think is in breach of the code, make a complaint to the ASA. You can complain via their website, www.asa.org.uk, or write to them at Mid City Place, 71 High Holborn, London WC1V 6QT.

E. Support Local Treatment Services

Could your Church premises be used for meetings for 12-step self-help or support groups for people affected by problem gambling? Is your local Church in a position to support treatment service providers financially? Could you help raise awareness of existing groups or support services in your community, to let people know about what help options are available?

F. Become a counsellor

You might feel that you would like to do something more to help problem gamblers. If you have the right skills and experience, you could consider applying to become a volunteer counsellor. GamCare have a list of partners that they work with throughout the country. From time to time GamCare recruit staff for their helpline. Further information is available on the GamCare website, www.gamcare.org.uk

G. Get Gambling on the political agenda

If you are worried or concerned about gambling and problem gambling, then express your feelings to your elected representatives. Let your MP, MSP, or councillor hear your concerns about gambling as they have some responsibility for gambling policy. The Welsh and London Assemblies are not directly responsible, but you could ask AMs to do more to provide services for problem gambling, and to highlight local problems and difficulties caused by problem gambling. If you think more should be done to protect children, young people and other vulnerable groups from being harmed or exploited by gambling, why not set up a petition, blog or write a letter to your local or national newspaper?

Gambling businesses are talking to Government; it is important that Government also hears clearly the views of people who are not part of the industry so that they can take those into account.

H. Pray

Invite your local church or prayer group to pray for those involved in support for problem gamblers, including for;

- Guidance and help for **problem gamblers, their families and friends** and those in debt so that they might find a route out of their problems and recover from their dependency.
 - Support and encouragement for **counsellors and treatment service providers** so that they can feel a sense of worth and fulfilment especially at difficult times.
 - Wisdom for the **gambling regulators and the government** so that the right decisions can be made to protect the most vulnerable in society.
 - Compassion for **operators and employees in the gambling sector** so that they will do their utmost to protect their customers and help prevent further problems.
-


The **Methodist Church**



The Methodist Church
Methodist Church House
25 Marylebone Road
London
NW1 5JR
020 7467 5123
www.methodist.org.uk

The Salvation Army
Territorial Headquarters
101 Newington Causeway
London
SE1 6BN
020 7367 4500
www.salvationarmy.org.uk

This document was written by David Bradwell and Captain Matt Spencer in August 2007 and updated in September 2009. This document is supported by the Baptist Union of Great Britain, CARE, the Church of Scotland, the Evangelical Alliance, Quaker Action on Alcohol and Drugs and the United Reformed Church.

Acknowledgments to the Responsibility in Gambling Trust, the Gambling Commission, the Advertising Standards Authority and Quaker Action on Alcohol and Drugs.

September 2009

Appendix A

Using your voice – be heard by your Licensing Authority

Information on how to make representations about a local premises licence application.

Visit your local council website or contact their offices for more information about their licensing policy.

You may be able to lodge an objection if:

- the gambling premises is near a school or other centre for children / young people
- it is near a centre for vulnerable adults – for example, people suffering from other addictions, or who have mental health issues or other problems
- the premises fail to abide by Gambling Commission guidelines or codes of practice.

If you are to be effective, you need to be clear about what your objections are and how they relate to the criteria by which the eventual application will be assessed.

You need to be able to set out clearly why you think the premises in question will breach one or more of the objectives.

However, you may also have other objections not directly related to gambling but which will matter to the Planning Committee of your local authority. There may be problems with people leaving the premises late at night and disturbing residents or with increased traffic. You also need to set out these objections clearly and the planning grounds on which you are making them.

Your objections will have more force if they are seen to come from community organisations or from individuals from a variety of organisations. As well as other churches, you might want to think about approaching other faith communities, youth organisations, schools and colleges and other voluntary organisations in your area to ask if they will support the campaign.

Local residents may be worried about the effect of new gambling premises near their homes. If your area includes some historic buildings, the local heritage society may support you. While these kinds of issues will not be your main focus, the more disadvantages you can point to, the more likely you are to be successful.

Tips for setting out your objections

If the local authority is already consulting on the proposal, you should write to whoever is conducting the consultation

- be polite and measured. You may feel very strongly about it but it does not help your cause to put people on the defensive at the start

- have a separate paragraph for each element of your concern, explaining why you think the premises licence would go against the principles in the Gambling Act or cause other difficulties for the community
- say clearly what you want them to do – such as not grant the licence, or ask for special conditions to be set, such as on opening hours or making sure there is information available for people who need help with problem gambling.
- list the organisations that are supporting the campaign
- include any supporting material – see the section on publicity
- offer to meet to discuss your concerns in more detail

You want everyone who may be able to influence the outcome to know about your concern, so you should send a copy of your letter to

- the Leader of the Council, the other party leaders and your local councillor or councillors; their names and contact details will be on your local authority website or available directly from the council offices
- your MP, and your MSP in Scotland or AM in Wales; again details are on the websites or you could try your local library.

If you already know one or more of your local councillors, you may want to ask for a meeting with him or her before you send the letter to try to get their support, but beware of allowing too long a delay. Councillors who sit on the planning committee may be unable to meet you so that they can remain impartial at the committee. If this is the case you will need to speak to another councillor.

What about publicity?

You do need to generate publicity for your campaign. This will make sure people understand that you are not just being a killjoy but that there are real problems. You will not get everyone to support you actively, but it is the way to persuade the rest of the community to sympathise with what you are trying to do and to create a climate of opinion in which it is easier for the politicians to meet some or all of your concerns. There are a number of ways of getting publicity.

You should approach the local paper at an early stage and explain to them what you are doing. Try to speak to a reporter rather than just sending them a letter or a press notice. If you can organise an event and/or photo opportunity to launch your campaign and another to mark the sending of your objection, they will probably cover them. They will also be interested in anything that involves a united front from a number of local organisations.

You may also want to think about approaching a local radio or TV station, perhaps when you are ready to send your letter. They will probably only be interested if you are campaigning against a specific proposal.

This does need to be thought through carefully, as they will want to balance your contribution with someone who supports the proposal; this is likely to be someone experienced in dealing with the media and you do not want to end up appearing to lose the argument. Before deciding to try to get radio or TV coverage, make sure that you

have someone to speak for you who is very clear what your objections are, who can put them clearly and succinctly and who will be able to deal with hostile questions without getting flustered.

What else could I do?

A great many local people will not see or hear the local media and you should think about how to reach them. One useful way is to start a petition. This gives you a reason to call at people's houses, to stand in the local shopping street, to put information in local shops and libraries. You may need permission for some of this; check with the police or your local authority. A public meeting to launch the petition would be a suitable event for the local paper to cover.

The petition would be designed to raise awareness of the issues locally; by itself, it will not have much effect on the decision. It is quite easy to persuade people to sign a piece of paper and the authorities will know that most of the signatures are from people who are neutral about the issue. But it will help local residents to understand the objections; it will provide something concrete on which to base local publicity; and it will be a useful supporting document to a well-argued paper from a coalition of community organisations.

You should also keep an eye on the coverage and the letters page in your local paper and write a letter to the editor if the coverage has been biased in favour of the proposal or has been misrepresenting your position. There is limited space in a paper, so keep your letter short and to the point; that will mean that the editor will not cut it and possibly distort your argument. Avoid abuse of your opponents, whatever they may have said about you; in order to be effective, you need to retain their respect and that of the local community.

The local authority can impose conditions in granting a licence. If you present your argument effectively, there may be some conditions or restrictions which will go some way towards meeting your concerns.

The management of the gambling premises will know that there was some serious and well thought out opposition. This will make them even more careful to do everything they can to prevent the problems which you fear.

So although you may not get everything that you want, a well targeted, well thought through campaign is almost certain to make a difference to the final outcome.

Appendix B

Action for people living in an area with one of the new casinos

If you live in one of the local authority areas that has been granted a licence to have one of the 16 new casinos under the Gambling Act 2005, and you have worries about the impact of the casino read the following information:

Press for local public consultation

First, check what consultation has already occurred. In the report of the Casino Advisory Panel, there was no mention of public consultations having taken place in Leeds, Luton, Scarborough and Swansea. (Swansea is cited as saying it did not do so for fear of ‘producing responses based on uninformed opinions’! – see www.culture.gov.uk/CAP/Is_shortlistees/responses/Swansea.pdf).

There is supposed to be a local ‘willingness to licence’ so press for consultation if it has not happened, perhaps in conjunction with local inter-faith groups. You could ask for a full consultation with the local populace to determine whether or not there is a genuine ‘willingness to licence’.

Even if some consultation did occur, the Local Authority will now take bids from gambling businesses for the casino licence. Guidelines for this are still being developed, but local Authorities are likely to be encouraged to consult with the public about the selection process. This should give an opportunity to make some contributions and press for the following:

1. Suggest the Licensing Authority uses ‘social responsibility’ as a selection criterion

Local Authorities will have some discretion about how they choose the successful bidder, but will have to set out their criteria in advance. Using social responsibility would help ensure effort and resources go into minimising potential social problems.

2. Suggest location should be a key criterion, in particular:

- **Away from housing / busy areas**
Problem gambling rates are lower if people plan their gambling episodes and how much they will spend, rather than casually calling into a gambling venue on the way home or from work. Arguing for a ‘destination’ site is consistent with the third objective of the Act, as it affords more protection for vulnerable groups.
- **Away from areas of social deprivation and facilities for children and young people**
Problem gambling rates also tend to be higher in areas and populations who already suffer other forms of disadvantage, and the same arguments about location apply.

Children will not be permitted to enter adult gaming areas of a casino. However, there may be associated leisure facilities, and the proposal may include a Family Entertainment Centre (amusement arcade) where children can use low-value slot machines. Problem gambling rates are higher among young people, particularly young men, which should be taken into account when the site is chosen.

3. Facilities to help / support problem gamblers

Resources for this should be part of the casino business’s bid. And include everything from advice through to counselling to a budget for severely affected gamblers who need residential help. There should also be Local

Authority and health plans to address gambling problems in mainstream services. This should include families and dependents.

4. Local monitoring / evaluation of impact on problem gambling rates

It is vital that this is assessed, since the Secretary of State will be reviewing evidence of the impact of casinos



The Methodist Church
Methodist Church House
25 Marylebone Road
London
NW1 5JR
020 7467 5123
www.methodist.org.uk

The Salvation Army
Territorial Headquarters
101 Newington Causeway
London
SE1 6BN
020 7367 4500
www.salvationarmy.org.uk

This document was written by David Bradwell and Captain Matt Spencer in August 2007 and updated in September 2009. This document is supported by the Baptist Union of Great Britain, CARE, the Church of Scotland, the Evangelical Alliance, Quaker Action on Alcohol and Drugs and the United Reformed Church.

Acknowledgments to the Responsibility in Gambling Trust, the Gambling Commission, the Advertising Standards Authority and Quaker Action on Alcohol and Drugs.

September 2009