

The Royal College of Psychiatrists
Submission to the Gambling Commission



**Consultation regarding the document on
“Gambling advertisements and impact on responsible gambling”**

The Royal College of Psychiatrists is the statutory body responsible for the supervision of the training and accreditation of psychiatrists in Britain and for providing guidelines and advice regarding the treatment, care and prevention of mental and behavioural disorders.

In the course of their work, psychiatrists are faced with people needing help who are in difficulty as a result of excessive gambling. The interest and concern of The Royal College of Psychiatrists about the new legislation regulating gambling in Britain are therefore the impact this is going to have both on the incidence of excessive gambling and also on children.

“Problem gamblers”

Throughout this document, there appears to be an assumption about “problem gamblers” that they are a homogeneous group. Moreover, there is the implication that they are in some way different from the rest of the population.

There is no evidence that this is so. While there are variations in the make-up of people who gamble excessively, this is clearly also the case in the general population. Fundamentally, “problem gambling” (or pathological gambling, as the World Health Organisation prefers to call it) is a behavioural disorder arising from faulty habits. It is a condition that can affect anybody.

The preoccupation with the individual person who gambles can be used to divert attention from the fact that the propensity to take gambling to excess is inherent in the very activity. It is well established that it is an activity that is addictive and that it can lead to a state of dependence as a result of practice. The degree to which this occurs varies and is greatest in those types gambling usually referred to as hard gaming.

This matter was discussed in The Royal College of Psychiatrists’ [submission](#) to the Gambling Commission on the consultation regarding the document on “Statement of Principles on Licensing and Regulation” in January 2006.

In particular, it has been conclusively shown that the expansion of the number and types of gambling facilities and their promotion inevitably lead to an increase in excessive gambling.

For obvious reasons, the Gambling Commission's approach is one that is much favoured by gambling promoters. It enables them to separate out the casualties from the rest of the population. The preparedness of the business interests to provide educational and "treatment" facilities can then be seen as a social service. In the meantime, active promotion supposedly directed to the "normal" population can appear to be justified.

Advertising of gambling

The advertising of gambling, especially those types that are most likely to lead to excess, viz. hard gaming, must include a consideration of the purpose of advertising. Commercial interests clearly favour the view that it is a way of providing information to customers. However, there is no doubt that its main purpose is persuasion to participate. Indeed, it is a very powerful way of doing so.

In these circumstances, the exercise that the Gambling Commission is carrying out is a rather futile one and has some of the elements of a mediaeval disputation. Since the purpose of advertising is to promote gambling activity, no euphemistic or frankly oxymoronic slogans about "responsible" behaviour will lead to anything other than more gambling. As indicated above, it is inevitable that there will be a consequent increase in excessive participation.

Furthermore, in spite of assertions about warnings and educational messages in advertisements, the experience in relation to tobacco and alcohol indicates that these have little effect when they are associated with active promotion of the product. Indeed, as is increasingly already happening in relation to gambling, especially the remote variety, warnings can be used by promoters as an image-building device that can entrap people.

Children

It is generally agreed that the activity of gambling is unsuitable for children. In view of its addictive properties, The Royal College of Psychiatrists strongly supports this view and advises that any type of advertising involving commercial gambling, in any form, should not be allowed to be directed or made available to children.

Football and other sporting shirts are a particular case in point. They are very popular with children, who always insist on the genuine article. The alternatives offered in Questions 8 & 9 therefore do not cover the situation in relation to children.

The Royal College of Psychiatrists therefore recommends that, the only way this matter can be dealt with is to ban *all* football and other sporting strips from carrying the branding of gambling operators.

Conclusion

It is vital to recognise that a policy that promotes gambling by advertising cannot also encourage moderation. The inconsistency in trying to do both inevitably will have a harmful effect on any educational attempt to provide a sensible attitude to gambling, especially in children. It will also undermine any help for those whose gambling has become excessive.

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