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Submitted to **Gambling Consultation**

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Tell us about you

Are you an individual or an organisation?

Organisation

Tell us about you

What is your name?

Name:

Rev Dr David Clements

What is your email address?

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What is your organisation?

Organisation:

Methodist Church in Ireland

Casinos

Should the law be amended so as to permit casinos to operate in Northern Ireland?

No

Poker and other gaming in pubs and clubs

Is the current legislation which prevents premises licensed to sell alcohol and registered clubs from offering poker, bingo and other equal chance gaming, still appropriate?

Yes

Regulation of remote (online) gambling

Is it necessary to consider additional Northern Ireland specific licensing and regulatory measures with respect to remote gambling operators?

Yes

Regulation of remote (online) gambling

How should the legislation be amended?

How should the legislation be amended?:

We need extra protections for those who are vulnerable to gambling addiction - especially young people. We have great concern because of the 24/7 nature of online gambling and some of the toxic online products, eg those linked to gaming and sports, which are particularly addictive.

Strict age verification is vital.

Consumer Protection

Are the current consumer protection measures available to Northern Ireland consumers when gambling online sufficient?

No

Consumer Protection

What additional measures could be introduced?

What additional measures could be introduced?:

Sites that operate in NI should be required to be part of GAMSTOP

Opening hours of bookmaking offices and commercial bingo clubs

Is the current legislation in respect of the opening of bookmaking offices still appropriate?

Yes

Opening hours of bookmaking offices and commercial bingo clubs

Is the current legislation in respect of the opening of commercial bingo clubs still appropriate?

Yes

Demand test

Is the current 'demand test' for new bookmaking offices still necessary?

Yes

Is the current 'demand test' for new bingo clubs still necessary?

Yes

Residency and incorporation requirements

Are the current conditions in respect of residency and incorporation for those wishing to enter the Northern Ireland gambling market still appropriate?

Yes

Age requirements for gambling operators

Are the current age restrictions in respect of the grant of a bookmaker's licence, bingo club licence, gaming machine certificate or permit or lottery certificate still appropriate?

Yes

Advertising

Is the current law in respect of advertising of gambling in Northern Ireland still appropriate?

No - There should be full alignment with the law in Great Britain in respect of advertising of gambling

Prize competitions

Should the current law in respect of promotional prize competitions and draws in Northern Ireland be amended to reflect that which exists in Great Britain?

Yes

Protection of children

Do you believe that other specific measures should be introduced to help protect children?

Yes

Protection of children

What measures should be introduced?

Please provide details:

We recognise that this may not be easy to legislate for, and perhaps even more difficult to enforce that legislation. Nevertheless we are deeply concerned for vulnerable young people who are 'native' to the digital environment in a way that their parents are not.

Gambling advertising is very sophisticated and very well resourced. While perhaps not directly aimed at children and young people, we are deeply concerned that online gambling companies are 'grooming' the next generation of their customers. There is evidence that early gambling participation increases the risk of

problem gambling in adulthood.

We think that there should be a comprehensive set of offences concerning underage gambling. These should include preventing children from using certain gaming machines, (e.g. fixed betting terminals) and from being invited to gamble online, including online gambling games on other sites, even when there is no exchange of money. There should be age verification for all online gambling, including free-to-play gambling games through gaming or gambling apps, Facebook or gambling websites. There should be no gambling adverts during sporting events before 9 am.

Protection of children

Do you believe that specific offences should be created in relation to causing or permitting an under-18 to gamble using certain gaming machines?

Yes

Problem gambling - research, education and treatment

Do you believe that the Northern Ireland gambling industry should help fund research, education and treatment of problem gamblers?

Yes

Do you believe that a power should be taken to impose a statutory levy on the Northern Ireland gambling industry?

Yes

Pool betting in bookmaking offices

Should the law be amended so as to permit pool betting in bookmaking offices?

Undecided

Enforcement of gambling contracts

Do you believe that gambling contracts should be legally enforceable?

Undecided

Cheating

Do you believe that the law should be amended so that those who cheat at gambling commit an offence, regardless of whether or not they are successful?

Yes

Betting - Further comments

Do you have any other comments in respect of betting?

No

Prize gaming in bingo clubs – stakes and prizes limits

Should the law be amended so as to increase the prize gaming monetary limits in bingo clubs?

Undecided

Monetary controls on the playing of bingo in a licensed club

Should the law be amended with respect to the monetary controls on bingo games?

No

Should rollovers be permitted?

No

Membership requirement

Should the law be amended so as to abolish the 24 hour membership requirement?

No

Commerical Bingo Clubs - Further comments

Do you have any other comments in respect of commercial bingo clubs?

No

Gaming Machines

Should gaming machines – including jackpot machines - continue to be permitted to operate as an incidental attraction at entertainments such as fetes, sales of work, etc provided the entertainments are not run for private gain?

No

Should “lower prize” gaming machines continue to be permitted to operate at travelling showmen’s pleasure fairs?

No

Definition of a gaming machine

Should the definition of a gaming machine be amended to reflect the variety of machines which now exist?

Yes

Gaming machine technical standards

Should the gaming machine technical standards that exist in Great Britain be adopted here?

Yes

Increases in current stakes and prizes limits

Should the law be amended so as to increase gaming machine stakes and prizes limits in line with corresponding limits in Great Britain?

Yes

Payment methods for machine gaming

Should gaming machines be able to accept stakes and pay out prizes in forms other than coins?

Yes

Payment methods for machine gaming

They should accept the following payment methods: Tick all that apply

Banknotes, Ticket in/Ticket out, Operator provided digital wallets

Other (please specify):

High-stake high-prize machine gaming (jackpot machines) in licensed gambling premises

Should higher stakes and prizes jackpot machines be permitted in bookmaking offices, bingo clubs and amusement arcades where entry is restricted to those aged 18 and over?

No

The number of gaming machines permitted in certain premises

Should the law be amended so that the number of gaming machines permitted in a registered club is related to the size of its membership?

Yes

The number of gaming machines permitted in certain premises

Should the law be amended with respect to the number of gaming machines permitted in a bookmaking office?

Yes

The number of gaming machines permitted in certain premises

How many gaming machines should be permitted in bookmaking offices?

3

More than 4:

Gaming Machines - Further comments

Do you have any other comments in respect of gaming machines?

Yes

Gaming Machines - Further comments

Please provide details

Please provide details:

Firstly, future regulation should cover all types of gaming machine and not leave legal grey areas, as has been the case for Fixed Odds Betting Terminals.³⁷ There should be a requirement for the Department in charge of regulation to know how many gaming machines are in operation.

Secondly, there should be a comprehensive set of consumer protection measures introduced for gaming machines, including self-exclusion, the ability to set time and spend limits, have mandatory alerts, prohibited mixed play between B2 and B3 games and algorithms to identify problematic play, and the use of tracking data as long as the data protection issues are addressed, and that data is used only with the player's consent.

Thirdly, there should be no contactless payments as a direct form of payment for gaming machines. Players should not be able to directly use their debit or credit cards with gaming machines. No credit cards should be used for any form of gambling or adding to digital wallets. A ban on credit cards for gambling will take effect in GB in April 2020

Monetary limits on stakes and prizes for societies' lotteries

Should the law be amended so as to remove the £1 stake limit on society lottery tickets?

Undecided

Monetary limits on stakes and prizes for societies' lotteries

Should the principle that the price of every chance in the same lottery must be the same be retained?

Yes

Should the current limits on proceeds (ticket sales) from an individual lottery and the total amount per society in any year be increased to reflect those in Great Britain?

Yes

Should the legislation in Northern Ireland be amended to reflect the law in Great Britain on lottery rollovers?

Yes

Deduction of expenses

Should the law be amended so that the proportion which can be deducted for expenses is the same, regardless of the amount of total proceeds?

Undecided

Should the law be amended so as to permit a greater proportion of the proceeds to be used for expenses?

No

The use of the internet for the sale of lottery tickets

Should the law be amended so as to permit the use of the internet in the sale of lottery tickets?

No

Lotteries - Further comments

Do you have any other comments in respect of lotteries?

No

Duration of licences

Is the current duration of licences appropriate?

Yes

Enforcement

Do you believe that the PSNI is the most appropriate agency to enforce the law?

No

Enforcement

Please provide details

Please provide details :

The recommendations for reform of gambling legislation should encompass the whole of the gambling industry and include a regulatory body to licence and regulate the gambling industry in NI to protect children, young people and those who are vulnerable to problem gambling. We think it may be appropriate for this to be the Gambling Commission already operating in GB.

Future regulatory framework for Northern Ireland

Do you believe that there is a need for a regulatory body for gambling?

Yes

Future regulatory framework for Northern Ireland

Which, if any, of the following options do you think would be most appropriate for Northern Ireland?

An existing regulatory body

Future Regulatory Framework - Further comments

Do you have any other comments in respect of the licensing, enforcement or regulation of gambling in Northern Ireland?

Yes

Future Regulatory Framework - Further comments

Please provide details

Please provide details:

The Gambling Commission has the ability to create codes of practice which gambling companies operating in GB must follow; to undertake actions to ensure gambling companies are complying with the law and to investigate whether an offence has taken place under gambling legislation and to pursue criminal proceedings if so. Similar powers should be made available to any future regulator who oversees gambling in Northern Ireland.

Gambling - Final comments

Do you have any other comments in respect of the future of gambling in Northern Ireland?

Yes

Gambling - Final comments

Please provide details

Please provide details :

The Methodist Church in Ireland has always been opposed to all forms of gambling. We regard gambling as an expression of the love of money which the Bible defines as the 'root of all kinds of evil'. (1 Timothy 6:10) Accordingly we encourage all our members not to participate in any form of gambling - including the National Lottery.

We recognise that this puts us in a minority (perhaps even within Faith Groups). We know that many regard gambling as a form of harmless entertainment - and for many that may be so.

Our deep pastoral concern is for the not insignificant number of problem gamblers and the impact on them and their families. It is with these people in mind that we have responded in the way that we have, seeking to restrict some of the potential harm caused by gambling - particularly to young people.

We were particularly impressed with the recent presentation at Stormont by 'Gambling with Lives' and we join in with their call for better services for those suffering from gambling addiction.

The gambling industry clearly have very deep pockets and are a powerful lobby group. The fact that the CEO of one online betting company last year earned about one million pounds a DAY, shows in whose favour the odds are stacked!

We pray for those who will legislate on the back of this consultation in the hope that caring for the vulnerable will weigh more heavily than the love of money.