

Submission by

The Council on Social Responsibility

On

Gambling

April 21st 2011

The Methodist Church in Ireland has 156 congregations in Northern Ireland. Our mission has always been to seek God and to seek God's blessing on the society around. We have sought to do this through our various ministries which have included outreach to the poor and marginalized, and by a long and proud history of engagement with society on social issues. Our belief is that theology must be rooted in the Bible but expressed in the public square.

Over many years, The Council on Social Responsibility has consulted with government departments, met with political parties, contributed to government reviews, encouraged dialogue, and sought to be a positive influence in social affairs in Northern Ireland. Such a contribution arises from our understanding that everyone is made in the image of God, that everyone matters to God, and the life of everyone can be enriched by the love of God. Often that contribution has taken the form of encouragement, and occasionally we have called to account government, political parties and departments because of stances taken or proposals made.

The consultation document seeking views on the laws affecting gambling in Northern Ireland provides another opportunity to contribute. Traditionally Methodists have opposed gambling. This may have arisen from the work ethic that our forefathers believed in, hence anything that was acquired without hard work was frowned on, but also from the belief that Christians should depend on God for everything including finances. The Methodist Church in Ireland continues to oppose all forms of gambling because of a continuing concern:

- a) about the morality of gambling and
- b) about its harmful consequences

We believe that gambling is a form of love of money which the Bible defines as “the root of all evil”, and in its wider ramifications it is undeniably a vast social disease. In 1996 the Methodist Church in Ireland said the practice of gambling and the pursuit of Christianity are incompatible because gambling is an appeal to blind chance & a denial of faith in God. Belonging to the Kingdom of God means a reversal of earthly relationships and values, because Jesus calls us to a radical lifestyle.

Our stance is unchanged. Nevertheless in reflecting upon the proposals of The Department of Social Development (DSD) about reforming the gambling laws in Northern Ireland, we welcome many of the suggestions. In particular, we welcome:

- 1) **The recognition that 1 in 50 of the population aged 16 +, in Northern Ireland has a gambling problem. Page 4, par 2.** This is a small but significant number of persons but is 4 times higher than in Great Britain. Lower wages and higher costs here, undoubtedly contribute to this. In 2010, Northern Ireland had the greatest number of bankruptcy recommendations in the UK, and the least amount of disposable income. In a time of recession, with rising unemployment, increased

pressure on family budgets, and with ease of access to on line forms of gambling, there is likely to be more pressure on individuals to turn to gambling in order to ease their financial burden.

2) **The recognition that the law here regarding gambling is complex. 4:3:3 & 2:1**

It covers gambling conducted in 330 book maker shops, 2 horse & dog race tracks, gaming machines in clubs, pubs, & hotels, 40 commercial bingo clubs. 200 local lotteries, and the National Lottery. Oversight is maintained by the courts, District Councils & DSD. Simplifying the law can only benefit society.

3) **The proposal not to introduce casinos into Northern Ireland. 3:2**

Casino gaming is generally regarded as the hardest form of gambling in terms of dangers to the individual and susceptibility to abuse by criminal elements. In a study entitled, "*The Social Implications of Casino Gambling*" by Brown and Fisher, and commissioned by The Home Office, the authors state that crime increases with increased available gambling." Studies from a variety of countries also show that increased accessibility of gambling has led to an increase in crime, including both organized crime within casinos and crime resorted to by problem gamblers to fund their habit" (p ii).

The Florida Department of Law Enforcement and the Chicago Crime Commission's Casino Gambling Committee are quoted as examples and they say that criminal activity extend to other activity associated with casinos. "The reports suggest that other illegal activities such as the rigging of construction bids, kickbacks to owners and corruption amongst the personnel who service the slot machines are also a known risk" (op cit p10)

4) **Establishing formal objectives aimed at keeping crime out, promoting fairness & protecting the vulnerable. 5:2**

It is the task of government to fight crime and to look after those least able to look after themselves. These objectives fit neatly into the tasks of all governments.

5) **The possible move from voluntary codes of social responsibility to a statutory one. 5:3**

A study of "Addiction", formerly "The British Journal of Addiction" from 1988-96, turned up a total of just 4 articles. One of these, "Prevalence Estimates of Pathological Gambling in Seville" (1992, Vol 87, pp 767-770) asserts that the prevalence of pathological gambling to be 6 times higher than the prevalence of opiate addiction. Also, since this article points out that it is the FIRST major epidemiological study of gambling ever carried out in Spain, it simply highlights the lack of research in the EU, in general and in the UK in particular, into the effects of gambling.

The proposal in this consultation document about social responsibility is to be welcomed.

6) Possible investment by the gambling industry in research and preventive treatment for problem gamblers. 5:5

Gambling is seen by many as part of everyday life, and those who have been participated have seen it as a harmless pastime. However the consultation document by DSD recognizes that for a significant minority in Northern Ireland gambling is life consuming.

The Royal College of Psychiatrists (RCP) in a document published in 2008, state that problem gamblers are more likely to become depressed, have alcohol or drug problems, commit suicide, become separated or divorced, and commit a crime to support their habit.

The industry has invested huge amounts of money in advertising in order to attract new customers, and has enjoyed the profits accruing. Yet those who have been affected by gambling cannot simply be ignored. Their problem impacts on other areas of life and ultimately costs the country through investigating crime, prosecuting those accused of crime, and housing criminals once convicted. On top of that the National Health Service will be forced to fund any medical or psychiatric problems that occur.

The Methodist Church in Ireland believes that those who contribute to the problem should contribute to solving the problem, hence our support for this proposal.

7) Imposition of a levy on gambling operators to assist problem gamblers. 5:6

A number of studies in the US, including Lesieur and Heineman (1988) and Jacobs (1989), op cit p 18, have found gambling problems are connected to other problems. "...problem gamblers suffer from multiple addictions, most commonly gambling and alcohol addictions, but increasingly gambling and drug addictions also.

Gambling is not a private matter but impinges on others. Physical abuse, anger, a desire to kill, attacks, attempted suicide are clearly documented as responses to problem gambling by spouses and partners. Children of problem gamblers have been noted for their own specific problems. "In a Californian study, teenage children who reported their parents as gambling to excess were distinguished from controls as being more involved with health threatening behaviours such as drinking, smoking, drug use, overeating and gambling. They also had more psychosocial problems, such as unhappy childhoods and broken homes, and a greater incidence of negative feelings, school and work problems, and suicide attempts." (op cit p 19).

"Recently a study by Ladouceur of Gamblers Anonymous Attendees in Quebec found that more than 33 per cent had missed work or left early to gamble more than five

times a month. More than 30 per cent had been late for work because they were gambling more than five times a month. For 11 per cent lateness can be a half day and 14 per cent had taken the whole day off to gamble.

Preoccupation with gambling debts, form and recent losses produced a lack of concentration affecting productivity to an unknown degree, with 59 per cent reporting difficulty in concentrating and irritability due to thoughts about gambling. Half of the sample had almost lost their jobs and 36 per cent had already lost them." (op cit p20)

If the above is true, it would seem that treatment and prevention programmes require massive funding. Presently there are barely any prevention programmes in the UK, and little help offered to those with problems arising from gambling.

8) The standardization of specific offences in relation to the use of gaming machines by under 18's. 5:4

Legislation relating to slot machines in the UK, is exceptionally liberal. The consultation document admits:

There are no restrictions in the 1985 Order specifically on the use of gaming machines by under-18s. Gaming machines may also be played in amusement arcades, commercial bingo clubs, bookmaking offices, the bar areas of pubs and hotels and in registered clubs.

This is in sharp contrast to stricter regulation of access which prevails elsewhere in the world. In the USA for example, slot machines are permitted in only 8 states, and the legal age limit is 21. Australia and virtually every other EU member state have stricter regulations governing the use of slot machines. Gamblers' Anonymous in the UK report an increasingly large number of young people seeking help for problems relating to excessive or uncontrolled slot machine use.

Given the above, we welcome the proposal to standardize specific offences in relation to gaming by under 18's.

There are some proposals which we **oppose**. These include:

1) Opening book making shops & commercial bingo halls on Sundays. 3:5

At present they open on Sundays in Great Britain and the Republic of Ireland. DSD argues that additional opening will create extra jobs, and lead to increased tax revenue. Already Sunday gambling is available at race tracks, gaming machines in amusement arcades, pubs, clubs and hotels.

We oppose this proposal for two reasons:

DSD propose stronger safeguards for those who choose not to work on Sundays. The fact that DSD are suggesting stronger safeguards suggests that the present safeguards are not working. Anecdotal evidence would support this belief, so how can those who prefer not to work on Sundays have confidence in this proposal? We believe such proposals will have a negative impact on family life, by leading to more occasions for family separation, and therefore create more pressure on families? Already family life in Northern Ireland is under pressure. One in five households with children are single parent families and only one in five children born in Northern Ireland has parents who are married. If Sunday provides a day free from work it also affords the opportunity for families to share together free from the stresses of everyday life.

Since problem gambling is defined in the consultation document as gambling to a degree that compromises, disrupts or damages family, personal or recreational *pursuits* 5:5, it would appear that increased opening of book making shops and commercial bingo halls on Sundays will only add to the problem.

2) The proposal to ease the current restrictions to permit poker, bingo and other equal chance games. 3:3

A clinical psychologist at Holywell Hospital in Antrim, (Mr Robin Davidson) has stated that the most addictive types of gambling found amongst his patients were: poker machines, on course betting, and betting at book maker offices. To relax the law is ignoring the evidence from within the health service in Northern Ireland, and will lead to greater problems in the long term.

The RCP argue that “if the facilities for gambling in the population are increased the total amount of gambling also increases”. They say that some who had previously not gambled will begin to gamble and as a result, the amount of gambling increases, with a corresponding rise in problem gambling.

3) The relaxation of laws regarding advertising of gambling in Northern Ireland. 3:9

Advertising is a multi million pound industry, and by its very nature is designed to persuade people to support what is being advertised. If advertising did not achieve its aim then the advertising industry would die out. It follows then that to relax the advertising of gambling here **MUST** lead to more people being persuaded to gamble with a corresponding rise in addictions. This thesis is supported by the RCP.

In their submission to the Gambling Commission, they claim “there are potent psychological and physiological effects associated with gambling that impact on the individual gambler affecting his/her ability to exercise rational choice.” (p1) and continue “the effects on those who participate in gambling inevitably encourage the chasing of losses.” (p2)

Further, at the time of writing, proposals to ban the advertising of tobacco have been produced. This is due to the accepted evidence that smoking is bad for your health and by banning advertising of tobacco, it is hoped that fewer people will start to smoke. If the government believe that advertising influences people to smoke it is strange that at the same time they are proposing to relax the laws governing advertising of gambling and still arguing that it will not result in more problem gamblers.

4) The relaxation of the law regarding the premises on which prize money can be paid out is viewed with concern. 4:1:7

Such a move means private houses can be used and immediately in the NI context, the possibility of dissident paramilitary's criminal activity cannot be ruled out. Since one of the key objectives of this review is to keep crime out, we suggest that such a relaxation as is proposed is contradictory.

5) Increasing the maximum gaming prize in bingo halls from £25 to £100 as per Great Britain. 4:2:4

It is our belief that the bigger the prize the greater the inducement to gamble, and, will only lead to an increase in problem gambling. Brown and Fisher are convinced that increased opportunity to gamble will lead to more problem gambling. "There is evidence which suggests that the availability of legalized gambling has increased the risks of persons becoming pathological gamblers. A direct relationship has been recognized in the US and in Britain, between the rate of addiction and the increased availability of gambling." (op cit p9) We oppose any action which could lead to increased problems.

6) Doubling the maximum prize available from a society lottery to £50,000. 4:4:3

All through the consultation document presented by DSD the law here is contrasted with the law in Great Britain, yet the maximum prize there is £25,000. It is our belief that increasing the prizes available will lead to more people gambling. This is why the industry is lobbying for such a change, but Lesieur (1994) in a US study, found "that as pathological gamblers run out of legitimate sources of finance for their gambling they resort to a variety of illegal means depending on their personal value systems, opportunity and perception of risk. These activities include cheque forgery, embezzlement, employee theft, burglary, armed robbery, bookmaking loan and other fraud, tax evasion, prostitution, and selling drugs". (Livingston 1974; Lesieur (1984) cited in Lesieur and Rosenthal, 1991). (Op Cit p10)

They argue that the backgrounds of gamblers who commit crimes are usually those of law abiding people. For this reason we oppose this proposal.

7) If illegal betting is taking place on Sundays in pubs and clubs because book maker shops are closed, and if gaming machines are being operated in unlicensed premises,

and those operating in licensed premises are offering stakes and payouts above permitted levels, **5:2** it seems to us that easing restrictions on gambling in NI will not solve this problem. We believe that if a problem currently exists then the PSNI need to be robust in dealing with it. Illegal betting may appear low down on the list of the hierarchy of crime, as viewed by the PSNI but in recent years the New York Police Department engaged in a policy of targeting smaller crimes and through their pursuit of such they discovered this led to a reduction in the crime rate for more serious offences. We believe turning a blind eye to what is already going on illegally is not an option.

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