Submission to the Department for Social Development

Future regulation of gambling in Northern Ireland

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Introduction

The Institute of Public Health in Ireland

The remit of the Institute of Public Health in Ireland (IPH) is to promote cooperation for public health between Northern Ireland and the Republic of Ireland in the areas of research and information, capacity building and policy advice. Our approach is to support Departments of Health and their agencies in both jurisdictions, and maximise the benefits of all-island cooperation to achieve practical benefits for people in Northern Ireland and the Republic of Ireland.

IPH welcomes the opportunity to comment on the future regulation of gambling in Northern Ireland being developed by the Department for Social Development (DSD). The review of gambling presents timely action to up-date legislation to reflect modern gambling practices.

The prevalence of problem gambling in Northern Ireland at over 2% of the population highlights the extent of the issue compared to 0.6% in Great Britain (GB). In 2010 IPH published ‘Developing a population approach to gambling: Health issues’ to assist DSD to highlight the links between gambling and health and the potential harm associated with problem gambling\(^1\). This report highlighted the need to carefully consider the approach to gambling in society and how problem gamblers are supported. IPH supports an approach which strikes a balance between developing gambling as a leisure pursuit and minimising its harmful effects.

The Republic of Ireland is also reviewing its gambling legislation and IPH urges DSD to consider how the issue of cross-border gambling can be tackled. We encourage maintaining close links with the Department of Justice and Equality in the Republic of Ireland.

Key points

- Recent research indicates that problem gambling in Northern Ireland appears to be nearly four times higher than GB. IPH suggests further work to investigate this difference in reported prevalence which is so much higher in Northern Ireland.
- Only a small proportion of those who gamble run into difficulty but for those who do there is a ripple effect with implications for family and community health and wellbeing
- Gambling can negatively affect significant areas of a person’s life, including: mental and physical health, employment, finances and relationships with others.
- A population approach is required to understand the prevalence of problem gambling, minimise harm including potential social costs and protect vulnerable groups.
- IPH welcomes the commitment to screen the Gambling Reform for health impacts and supports this approach.
The consultation covers most aspects of gambling. IPH comments are made in relation to specific sections.

**Section 3**

- Increased accessibility through increased opening hours and advertising. Economic gains should not be the only factor taken into consideration when looking at increasing accessibility by offering gaming in pubs and clubs, Sunday opening and commercial Bingo clubs. Consideration needs to be given as to how to protect people from the potential harm done by increasing access and opportunities to engage in gambling. A review of the controls in place in Great Britain could help to identify what constitutes a responsible gambling environment and what additional measures could be adopted to protect individuals.

**Section 5**

5.3
- We support the statutory code of social responsibility already in place in GB and the work undertaken to ensure the gambling industry develops links to organisations which support problem gambling. However this is a voluntary code in Northern Ireland and IPH recommends that this is underpinned by a firm statutory basis with appropriate penalties for non-compliance in the gambling industry.

5.4
- We support measures to protect children and the vulnerable as evidence suggests rates of adolescent gambling are 2-3 times higher than rates among adults, and that this can be attributed to participation on electronic gaming machines. Different gambling practices are evident across socio-economic groups and also between men and women. IPH believes a population approach should be adopted rather than an approach which is restricted to a focus on children and vulnerable people. A wider approach aims to reduce the prevalence of problem gambling and minimise associated potential social costs and harm.

5.5
- The development of baseline data is essential as a starting point to contribute to identifying the extent of problem gambling. IPH questions why problem gambling prevalence is four times higher than Great Britain and what factors are contributing to this higher rate. IPH recommends gambling prevalence surveys are undertaken on a regular basis to provide a monitoring mechanism to assess the effectiveness of changes to the Gambling Laws.

- Problem gambling can negatively affect significant areas of a person’s life including mental and physical health, employment, finances and relationships with others. It is a public health issue and therefore a wide approach which aims to protect health is required, including the need to develop and support appropriate mental health services. Recent research shows that a public health approach to problem gambling is more cost-effective in preventing gambling problems’.
• The Responsible Gambling Strategy Board (RGSB) plays a vital part in understanding problem gambling. IPH suggests Northern Ireland investigates linking to the RGSB rather than establishing another similar organisation in Northern Ireland. While there is a need to ensure recommendations are appropriate for Northern Ireland, linking to RGSB would increase capacity, avoid duplication and improve efficiency.

• IPH welcomes introducing an industry levy to provide resources to fund research, education and treatment of problem gamblers. This model works successfully in New Zealand and Australia and provides resources to develop adequate facilities for tackling and supporting problem gambling.

Chapter 7

• Whilst DSD is not responsible for the treatment or care of those who may suffer from problem gambling the reform in gambling legislation presents the opportunity to develop an effective strategy to ensure necessary protection measures for health are in place. IPH appreciates the difficulty in achieving a balance between respecting individual choice and introducing protective legislation. IPH welcomes the commitment DSD has made to screen the reform for health impacts. Health impact assessment (HIA) will systematically consider the potential health impacts of the revised gambling legislation and will present recommendations to strengthen in favour of improved health.

• IPH welcomes the opportunity to support DSD by assisting in screening the Gambling Reform for health impacts.

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References