

Opening Statement - Pre-legislative scrutiny of the General Scheme of the Gambling Regulation Bill

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Introduction

Thank you for the opportunity to present an opening statement on this important legislation. Our statement builds on the written submission submitted in January. The Institute of Public Health is an all-island organisation jointly funded by the Departments of Health in Ireland and Northern Ireland. We support evidence-informed policy making with a particular focus on reducing health inequalities. We provided evidence to the Northern Ireland Betting, Games and Lotteries & Amusements Bill consultation in November 2021 and the Gambling Codes of Practice relating to the Bill in February 2022.

Declaration of Interest

We as individuals, and on behalf of the Institute, declare no conflict of interest in respect of any direct or indirect financial assistance, or funding, or any professional relationship with the gambling industry, or any entity working to further its interests. Our statement features only data and evidence free from any declared affiliation, funding or otherwise, with the gambling industry.

Purpose of the Bill

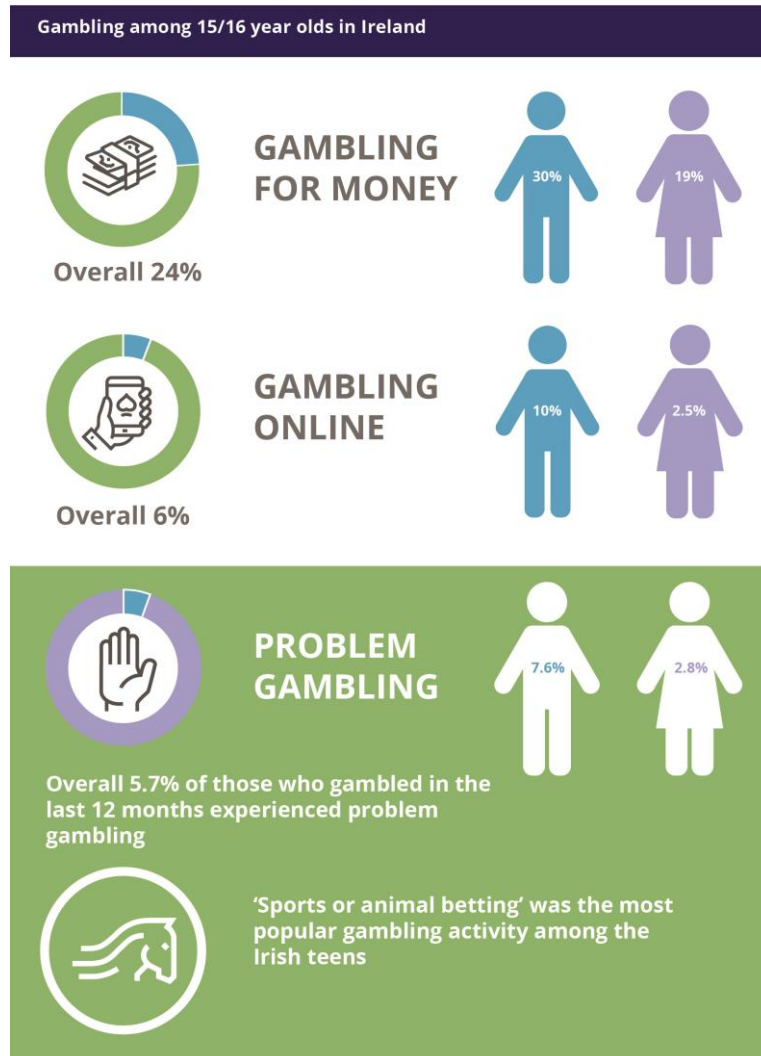
There is no government strategy to reduce gambling related harm – no roadmap for action across government departments nor any specified goals or targets. This Bill is therefore critical as a tool for change. The Programme for Government committed to bring forward gambling legislation that protects ‘*public safety and wellbeing*’¹. The measures in the Bill must:

- Reduce the exposure of the overall population to gambling-related harms
- Reduce the incidence of problem gambling among adults and children
- Protect vulnerable people including children, people with mental ill-health and those living with problem gambling or multiple addictions.

¹ Department for Justice. General Scheme of the Gambling Regulation Bill. Available at: <https://www.justice.ie/en/JELR/Pages/General-Scheme-Gambling-Regulation-Bill>

Children

Around one in four 15-16 year olds in Ireland gambled for money in the last 12 months². Of these, 5.7% are experiencing problem gambling, with three times as many boys affected than girls. Regulation in Ireland must focus on making gambling much less appealing and accessible for children, as well as less harmful for those that do gamble.



Source: ESPAD Group (2020), ESPAD Report 2019: Results from the European School Survey Project on Alcohol and Other Drugs, EMCDDA Joint Publications, Publications Office of the European Union, Luxembourg.

Adults

For every person experiencing problem gambling another six are adversely affected³. There is a spectrum of disordered gambling behaviours. In Ireland, it is estimated that 2.3% meet the criteria for low-risk gambling (approx. 90,000 adults), a further 0.9% meet the criteria for moderate-risk gambling (approx. 35,000), and 0.3% (approx. 12,000) experience problem gambling⁴. Men, and those who live in socially and economically deprived circumstances are especially vulnerable.

² ESPAD Report 2019. Available at: http://www.espad.org/sites/espad.org/files/2020.3878_EN_04.pdf

³ Goodwin et al. 2017. A typical problem gambler affects six others. Available at: https://www.researchgate.net/profile/Judy-Rose-2/publication/317387586_A_typical_problem_gambler_affects_six_others/links/5a601806458515b4377b8d29/A-typical-problem-gambler-affects-six-others.pdf

⁴ Gambling in the Republic of Ireland Results from the 2019–20 National Drug and Alcohol Survey. Available at: https://www.hrb.ie/fileadmin/2_Plugin_related_files/Publications/2022_Publication_files/2022_Evidence_Centre/Gambling_in_the_Republic_of_Ireland_Results_from_the_2019-20_National_Drug_and_Alcohol_Survey.pdf

Mental health

Problem gambling and mental ill health are strongly related, but in complex ways. Irish data demonstrates that those with alcohol and drug use disorders are more likely to be experiencing at-risk or problem gambling³. There are no publicly available data relating to gambling, self-harm, and suicide in Ireland. Reducing gambling related harms through appropriate regulation can protect mental health and reduce poverty.

Recommendations

Pace and priority

Reform of gambling regulation is overdue and important to public health, health inequalities and especially mental health. We recommend that pace and priority is placed on passing this Bill.

Representation and managing COI (Heads 10, and 17)

Protecting and enhancing public health must be protected as a key objective of the Bill and the role of the Regulator. Provision should be made to include public health expert representation as Members of the Authority and advisory committees. In order to maintain public trust and adherence to public health goals, conflict of interest must be very tightly managed.

Amendments to better protect vulnerable groups (Heads 49, 86, and 92)

We recommend that limits are applied to all gambling products, stakes, prizes and deposits, including online. We recommend a scheme of escalating fines and a threshold, if exceeded, which would trigger revocation of a licence. Breach of self-exclusion measures should incur an automatic loss of license.

Protection of children (Heads 109, and 111)

7% of children in the UK aged 11-16 who had seen gambling advertisements or sponsorship said that it prompted them to gamble when they would not have done so otherwise⁵. Sport plays an important role in public health - promoting physical activity, child development, weight management and mental health. We recommend a phasing out of gambling industry sponsorship in sport.

END.

⁵Young People and Gambling Survey 2019. Available at: <https://www.drugsandalcohol.ie/31248/1/Young-People-Gambling-Report-2019.pdf>