



**Northern Ireland
Assembly**

COMMITTEE FOR COMMUNITIES

Please use this form to submit written submissions in relation to the Licensing and Registration of Clubs (Amendment) Bill. Return to committee.communities@niassembly.gov.uk by Wednesday 19 October 2016.

Name: Michael Fee (Regional Manager)

Organisation: Northwest Bookmakers Limited (Trading as Ladbrokes)

Date: 19th October 2016

1.1 Northwest Bookmakers Limited (Trading as Ladbrokes)

Ladbrokes are a leading brand in the UK, Ireland and Belgium. Our Sportium joint venture is a major player in retail betting in Spain and we also have a growing presence in Australia. We employ more than 14,000 people in total. We take our responsibilities very seriously. We are helping to take our industry forward on Responsible Gambling, and we have a Board Committee dedicated to overseeing the integrity of our own approach.

At a local level Ladbrokes are the largest bookmaker in Northern Ireland, currently operating 77 licensed betting shops and employing around 400 people. Our success enables us to make a contribution to society, both to the Northern Ireland economy and the local communities in which we work. We pay our taxes and duties, we provide jobs and long-term career opportunities, we buy products and services from a wide range of local suppliers and support many local charities.

Ladbrokes classification: Public

1.2 Illegal gambling in pubs and clubs.

Illegal gambling has been a growing problem in Northern Ireland for many years. Licensed betting shops are permitted to open on Sundays in England, Scotland, Wales and the Republic of Ireland, but not in Northern Ireland (as determined by The Betting, Gaming, Lotteries and Amusements (Northern Ireland) Order 1985). This created the conditions to allow illegal bookmaking to flourish in pubs and clubs, initially to satisfy the demand for betting on Sunday. After all many major football, sports and racing fixtures take place on Sundays. For many reasons there has been a generally accepted failure by authorities to tackle this issue. Therefore illegal bookmaking has now expanded to all days of the week and has grown considerably. Unchallenged illegal bookmaking in pubs and clubs has now become so prevalent that some unscrupulous licenced bookmakers have recently been approaching pubs and clubs. They are offering to install a free betting screen plus commission on profits in return for them taking bets on behalf of the bookmaker. They attempt to pass this activity off as legal when it is clearly not.

1.3 The impact of illegal gambling.

Our business is under serious threat from illegal bookmaking in pubs and clubs. Trading conditions are already tough for the retail, leisure and hospitality industry. However, that does not excuse pubs and clubs offering an illegal betting service to try and boost their own trade at the expense of legal, regulated licenced betting shops. If illegal gambling is not checked it is inevitable that betting shop closures and job losses will result.

Illegal gambling takes place in an unregulated environment with no customer protection, no social responsibility practices and without the payment of the appropriate taxes and duties. We agree that gambling must protect the young and vulnerable, be crime free, and be conducted in an open and fair way. The only way to meet these objectives is to only permit gambling in a regulated, licensed environment and to strongly challenge illegal betting elsewhere.

1.4 Gambling Responsibly

Ladbrokes take our responsibilities seriously:

- Keeping crime out of gambling.
 - Ladbrokes have AML & Compliance teams auditing our business and taking action when required
- Protecting the young and vulnerable.
 - Ladbrokes operate a Think21 policy supported by test visits, a Self-Exclusion procedure and train our staff in Positive Interaction to help identify and deal with potential problem gambling
- Making gambling fair for all.
 - Ladbrokes terms and conditions are clearly stated and we are members of IBAS, an independent body offering resolution of betting disputes.

We are aware that other licenced bookmakers in Northern Ireland also operate in a regulated, safe and fair manner.

2.0 Proposal

Illegal gambling is prevalent in pubs and clubs throughout Northern Ireland. We believe that the introduction of the Licensing and Regulation of Clubs (Amendment) Bill provides an opportunity to help prevent illegal gambling in pubs and clubs. In particular we would like to propose that illegal gambling should be punishable with penalty points (Schedule 10A) and ultimately the loss of a license for repeat offenses.

In other regards we support the proposed changes as we would like to see a prosperous and vibrant retail, leisure and hospitality sector in Northern Ireland. Licensed Bookmaking and pubs have often thrived together with mutual respect and co-operation. In order for this to continue we hope that this opportunity is taken to help take illegal gambling out of pubs and clubs.

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