

Gambling with Lives briefing for the Betting, Gaming, Lotteries and Amusements (Amendment) Bill - Committee Stage

Gambling with Lives is concerned that extending opening hours for any gambling establishments in Northern Ireland will lead to an increase gambling-related harm. The recent Public Health England report "Gambling-related harms: evidence review" found that increasing the availability of gambling is a key factor in increasing not only gambling activity but also gambling harm.

As far as we are aware, there is no public outcry for greater availability of gambling in Northern Ireland, so we find this proposal both concerning and unnecessary. Whilst we are aware of the threat posed by the 24/7 availability of online gambling, land-based gambling venues provide those suffering with gambling disorder with the means to bypass any online or bank blocking tools that could significantly aid their recovery. Extending opening hours of betting shops will therefore inevitably lead to increased harm, especially increased access to fixed-odds betting terminals (FOBTs) which have addiction and at-risk rate of FOBTs is over 50 per cent.

We fully believe that all gambling products, especially FOBTs, should be strictly for adults only. We strongly support the need for much stronger sanctions on operators and establishments that encourage under-18s to use addictive gambling products, including custodial sentences. We note that due to the financial profitability of the gambling industry, financial fines are insufficient and often passed off as operational costs.

Gambling with Lives is fully in favour of a statutory levy on gambling operators to cover the costs of gambling addiction treatment, independent education, and independent research. It is vital that these services are independent of the gambling industry and do not receive voluntary funding. The levy should also cover online gambling and should be calculated to cover the costs of the above independent services, where there is currently a significant shortfall of funding. We note that a figure of 1% of the gross gambling yield (GGY) has been proposed in the UK. However, given the substantially higher rate of 'problem gambling' in Northern Ireland, any NI-specific levy would need to be substantially higher.

We believe the Department should issue, and rigorously enforce, an operators' code of practice that ensures all operators have a mandatory, legally enforceable duty of care to protect their customers from harm. Specific requirements for this code of practice should include:

- All operators to be a part of the multi-operator self-exclusion scheme, allowing an individual to self-exclude easily and centrally from all land-based operators
- The operation of self-exclusion must be rigorously implemented with substantial fines for any operator breaching the measure
- The implementation of strict affordability criteria
- Age and ID verification should be stringent, requiring a delay of at least 72 hours before a new account can be verified
- There should be a complete ban on all 'free' bets, VIP schemes or any inducements to gamble
- No form of gambling on credit
- All gambling products should carry clear warning signs about their addictiveness and danger
- All customers should be required to specify deposit and time limits at the start of any gambling session
- Gambling operators should be required to train their staff to recognise signs of gambling addiction and to take action to intervene and prevent any customer identified as being 'at risk' from gambling

- Operators should be required to report annually to the Department on incidents of gambling harms and how they are delivering effectively on their responsibility to protect their customers.

However, we are concerned that without effective enforcement, any Code of Practice will simply be ignored. This is evident in the field of gaming machines, where a lack of effective enforcement combined with hugely outdated legislation has led to gambling operators in Northern Ireland simply choosing to follow the law in Great Britain, rather than that of Northern Ireland.

Therefore, we strongly support the creation of a Northern Ireland equivalent of the UK Gambling Commission, resourced to proactively oversee and rigorously enforce regulation of the gambling industry. To this point, we also support the establishment of an independent ombudsman with responsibility for protecting the individual consumer and wider public.

Finally, we would like to see online gambling specifically addressed in the second stage of reforms. Whilst we greatly appreciate the need to update existing land-based legislation, the digital landscape has evolved beyond all recognition since the turn of the century and new legislation is required to tackle the huge growth in online harm. As well as an independent ombudsman and Northern Ireland equivalent of the Gambling Commission previously outlined, the second stage of reforms should include:

- Treating gambling harm as a public health issue and implementing measures to protect the entire population from harm
- The use of affordability checks – recent research by the Social Market Foundation and the Centre for Social Justice suggested an ‘affordability trigger’ of around £100 per month
- Consumer redress – legislation needs to recognise that harms spread way beyond the gambler. All these groups need protection and should have a right to challenge the actions of individual operators and effectively seek redress
- Clearly labelling dangerous products with public health warnings about the risks associated
- Availability – robust source-of-wealth checks, no gambling on credit and a scheme that allows customers to self-exclude from land-based and online
- Age appropriate and awareness training – independent gambling education to be incorporated into the national curriculum and made available to young people and their parents

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Submitted to Betting, Gaming, Lotteries and Amusements (Amendment) Bill - Call for evidence and views
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Introduction

1 How would you like your response to be published?

I would like my response to be published.

2 Are you content that any of your suggestions which have been published to the Committee or the Assembly may inspire the text of an amendment?

Yes

3 What is your name?

Name:
Nicholas Harvey

4 What is your email address?

Email:
nick@gamblingwithlives.org

5 Please indicate if you are providing a response:

On behalf of a organisation or business

If on behalf of an organisation or business, please state its name::

Gambling with Lives (a charity set up by and for families bereaved by gambling-related suicide)

Policy objectives of the Bill

6 Do you think that the Bill will meet its overall policy objectives to: address a number of specific anomalies with regard to the current regulation of land based betting, gaming, lottery and amusement activities and to strengthen existing regulatory protections for operators and consumers as well as young people and those who may be vulnerable to gambling harm?

Other

Please explain your answer:

We are concerned that the Bill will not provide sufficient significant improvement in regulatory protection for consumers, especially young people. The extension of opening hours for betting shops means that people suffering from gambling addiction may find it more difficult to address their addictions, since betting shops will be accessible to them more of the time.

In addition, while we welcome moves to create greater protections for young people from gambling harm as a result of using gaming machines, we have some concerns about how this will work in practice. Specifically, the creation of new offences for permitting people under the age of 18 to use gaming machines will be meaningless without effective enforcement. At present, the rules on gaming machines are not enforced effectively – betting shops here routinely offer machines offering significantly higher stakes and prizes, and in higher numbers than is permitted by legislation. As such, we believe that more detail is needed on how these offences will be enforced, before we would feel comfortable that they will make any positive difference.

We also note that it is vital that legislation to improve safety around online gambling is prioritised for urgent action. It is clear that the future growth of the gambling industry is likely to be online. The potential harms from online gambling are enormous and catastrophic.

7 Do you foresee any unintended consequences of any of the policy objectives of the Bill?

Yes

Please explain your answer:

As outlined in our answer to question 6, we are concerned that extending opening hours for betting establishments may increase associated gambling harm. The recent Public Health England report "Gambling related harms: evidence review" identified availability and accessibility of gambling as being a key factor in both increasing gambling and gambling harms. In addition to creating more opportunities for gambling, which will inevitably lead to increased gambling harms, extension of opening hours also contributes to the apparent normalisation of gambling. It is important to note that more people don't gamble than do: "not gambling is normal" should be the public messaging from any legislative changes. We are not aware of any public outcry for greater availability of gambling opportunities.

Clauses 1, 2 and 3

8 Clause 1: "Interpretation": confirms that all references to "the 1985 Order" within the Bill mean the Betting, Gaming, Lotteries and Amusements (Northern Ireland) Order 1985. Do you have any comments on this?

Comments on References as per Clause 1:

9 Clause 2: "Opening of licensed offices on Sunday and Good Friday". Do you agree with this clause, which amends Article 31 of the 1985 Order to allow licensed offices to be opened for the transaction of business on Sundays and Good Fridays, but not on Christmas Day including Christmas Days which fall on a Sunday?

No

Please explain your answer:

As outlined in our answer to question 6, we are concerned that extended the opening hours of these establishments will lead to an increase in associated rates of gambling harm (see Public Health England: Gambling Related Harms – evidence review.) The relationship is clear: increased availability and accessibility of gambling products leads to increased gambling and increased gambling harms. While it might be argued that those who are addicted to, for example, sports betting have opportunities to gamble 24/7 online, the fact that betting shops are still operational despite the online challenge shows that there is a community of people who use their services.

Evidence from people with lived experience of gambling harms indicates that the anonymous nature of gambling in a land-based venue makes it easier to hide a gambling addiction from friends and family. Importantly, land-based gambling also provides a mechanism for people to 'get round' any various online protections (such as blocking gambling sites on their devices or having bank blocking in place). As such, for those people the wider availability of betting shops and extended opening hours will inevitably lead to greater harms.

In addition, keeping betting shops open for longer, means that the so-called FOBTs which are in operation in betting shops, will be accessible to customers for longer. It is now widely recognised that FOBTs are amongst the most addictive gambling products which are available. While GB legislation has decreased the damage they can do by limiting the maximum stake to £2 per spin, they remain highly addictive and any stake limits in NI are only voluntary in nature. Therefore, extending the opening hours of licensed offices also means increasing access to these very addictive machines. This is an issue of particular importance to Gambling with Lives, as it is the overwhelming experience of the families we represent that their children's gambling addictions that led to their deaths were caused by engagement with electronic gaming machines such as FOBTs.

10 Clause 3: "Sunday working in a licensed office". This clause will amend Schedule 8A of the 1985 Order to ensure that the rights of individuals employed in a licensed bookmakers' office will now mirror those of individuals who work at a track for a bookmaker with respect to Sunday working. Do you agree with this Clause?

Not Answered

Please explain your answer:

11 Do you think Clause 3 will allow sufficient protection for those working on a Sunday in this industry?

Not Answered

Please explain your answer:

Clauses 4, 5 and 6

12 Clause 4: "Pool betting". This clause will amend Article 44 of the 1985 Order to restrict any person, other than a registered pool promoter, from carrying on any pool betting business except at a licensed track and except by means of a totalisator operated in accordance with Article 45. Do you agree that it is right to restrict pool betting business to registered pool promoters?

Not Answered

Please explain your answer:

13 Clause 5: "Persons who may participate in bingo at a bingo club". This Clause will amend Article 75 of the 1985 Order to ensure that only members of a bingo club and their guests are allowed to participate or take part in bingo at a bingo club premises. The amendment also means that members of the bingo club and their guests may also take part in bingo at the premises irrespective of any time elapsing since application for club membership was made. Do you agree with this cause?

Not Answered

Please explain your answer:

14 Clause 5 also removes the current exemption which allows cleaners or certain other employees of the bingo club as may be prescribed by regulations, to play bingo. Do you agree with this cause?

Not Answered

Please explain your answer:

15 Clause 6: "Days when bingo and use of gaming machines permitted on bingo club premises". Do you agree with this clause which will amend Articles 76 and 108 of the 1985 Order to allow bingo to take place and gaming machines to be made available on bingo club premises on Sundays and Good Fridays, but not on Christmas Day including Christmas Days which fall on a Sunday?

No

Please explain your answer:

As we outlined in our answer to question 9, we are concerned by the extension of opening hours for any establishment offering gambling products. This objection applies to bingo halls just as much as to betting shops. In addition, our concerns about so-called FOBTs applies here too, since bingo halls also operate gaming machines on their premises. We are not aware of any public outcry for more opportunities to gamble.

Clauses 7, 8 and 9

16 Clause 7: "Offence of inviting, etc. person under 18 to play gaming machine". This clause inserts a new entry into the 1985 Order to create a new offence in relation to the playing of gaming machines by persons under the age of 18. Punishment can be imprisonment for 6 months. Do you agree with this new offence?

Yes

Please explain your answer:

We strongly believe that all gambling should be 18+. There is substantial clear evidence that young people are at greatest risk of developing gambling disorder. All recent moves in terms of wider UK legislation have been to increase the legal age for any form of gambling to 18. This applies even to gambling products which seem to be associated with lower levels of risk.

Therefore, we are strongly in favour of measures to limit access to the most dangerous of products such as gaming machines. The latest available UK-wide evidence shows that addiction rates among those using FOBTs are well over 10 per cent, with the addiction and at-risk rate being more than 50 per cent. Fortunately, currently only a small percentage of people actually use these highly addictive machines. Despite this, over half of all addiction in the UK is associated with these machines. Under no circumstances should they be available to those under 18 years of age.

17 Clause 7: Do you agree with the proposed level of punishment?

Yes

Please explain your answer:

We agree that there needs to be a strong sanction imposed on people who do try to peddle these products to young people and agree that a prison sentence is the appropriate measure. The massive profitability of such machines mean that a financial penalty would be treated as a 'cost of business' and would have little deterrent impact.

18 Clause 8: "Arrangements not requiring persons to pay to participate". This clause amends Article 131 of the 1985 Order and introduces a new Schedule 15A to the Order with the result that it removes free to enter prize competition arrangements from the definition of a lottery. Do you agree with the removal of free to enter prize competition arrangements from the definition of a lottery?

Not Answered

Please explain your answer:

19 Clause 9: "Rules for societies' lotteries". This clause amends Article 137 of the 1985 Order to remove the £1 ticket price for society lotteries – do you agree with this removal?

Not Answered

Please explain your answer:

20 Clause 9 will also amend Article 137 of the 1985 Order to alter the limit on the amount which may be appropriated for the expenses of a society lottery to 20% of the whole proceeds. Do you feel that this is an appropriate limit?

Not Answered

Please explain your answer:

Clauses 10 and 11

21 Clause 10: "Qualifications by age, residence or corporate status for licences, certificates and permits". This Clause amends Articles 7, 61, 84 and 141 respectively of the 1985 Order to reduce the lower age limit from 21 to 18 years of age and remove the residency restrictions for grant of a bookmaker's licence, bingo club licence, a gaming machine certificate and permit and a lottery certificate. Do you feel that it is appropriate to lower the age limit from 21 years to 18 years of age in any or all of these categories?

Not Answered

Please explain your answer:

22 Clause 10: Do you feel that it is appropriate to remove the residency restrictions?

Not Answered

Please explain your answer:

23 Clause 10 also repeals Articles 7,61,84 and 141 to allow certain corporate bodies to hold a bookmaker's licence, bingo club licence, a gaming machine certificate and permit and a lottery certificate. Do you feel this is appropriate?

Not Answered

Please explain your answer:

24 Clause 10 also amends Articles 109 and 155 respectively of the 1985 Order to allow a body corporate to hold an amusement permit or a pleasure permit. Do you feel this is appropriate?

Not Answered

Please explain your answer:

25 Clause 11: "Prize competitions not requiring persons to pay to participate". This Clause introduces a new paragraph to Article 168 which specifies that a prize competition arrangement is not prohibited by Article 168 unless persons are required to pay to participate in the arrangement and refers to new Schedule 15A (Lotteries and Competitions: Requirements to Pay in Order to Participate) of the 1985 Order (introduced under Clause 8), as setting out what does and does not constitute a requirement to pay to participate in such an arrangement. Do you feel it is appropriate for there not to be a requirement to pay to participate?

Not Answered

Please explain your answer:

Clauses 12 and 13

26 Clause 12: "Cheating". This clause will replace the existing offence Article 169 in the 1985 Order with a new Article 169 to make it an offence for any person to either cheat at gambling or do anything to enable or assist another person to cheat at gambling. Do you think this clause is sufficient to deal with the offence of cheating?

Not Answered

Please explain your answer:

27 Clause 13: "Enforceability of gambling contracts". This clause repeals Articles 170 and 171 of the 1985 Order and will provide for contracts relating to gambling to be legally enforced without prejudice to any law which prohibits the enforcement of contracts on unlawfulness grounds. Do you think that it is appropriate that contracts relating to gambling are legally enforced?

Not Answered

Please explain your answer:

Clause 14

28 Clause 14: "Industry Levy". This Clause inserts a new Article 172A (Industry Levy) into the 1985 Order to will allow the Department to make regulations with regard to the payment of a levy to the Department by every person who intends to apply for the grant or renewal of a bookmakers' licence, bookmaking office licence, bingo club licence, gaming machine certificate or permit and amusement permit. Do you think that is right to introduce such a levy?

Yes

Please explain your answer:

Gambling with Lives is strongly in favour of a statutory levy on gambling operators. We believe it is important that there should be a statutory levy of a size to ensure that sufficient funds are guaranteed to cover the costs of treatment and independent education/prevention and research.

The levy should be extended to cover remote gambling and needs to be calculated such that all costs of treatment associated with gambling are covered, as well as providing sufficient resources to deliver gambling harms education and awareness in all schools in NI and to support a significant programme of independent research. We note that a figure of 1% of gross gambling yield (GGY) has been used as an example in the UK. However, given the substantially higher 'problem gambling rate' in NI, it is likely that a NI-only levy would need to be substantially higher.

Experience in the UK and elsewhere shows that a voluntary system does not work for three main reasons: inadequate levels of funding for research, education and treatment (RET); lack of consistency and security of funds; industry influence over organisations, the research agenda and institutions, education specialists and treatment providers.

New mechanisms will need to be established to ensure that funding through a statutory levy is allocated and administered entirely independently from the industry. In addition, it is vital that this levy be extended to cover the online sector as well, at the earliest possible opportunity.

29 Clause 14: The aim of the levy is that it will be expended on projects related to gambling addiction or other associated forms of harm and exploitation and that financial assistance may be provided by grants, loans or any other form of financial assistance. Do you think that this is an appropriate use of the levy?

Yes

Please explain your answer:

We strongly believe that the money raised by the levy should be ringfenced for research, education/prevention and treatment of gambling addiction. We have called for this for some time in GB, to address the current shortfall in funding for these areas and to permit vitally important work to be carried out independently of the gambling industry. We believe this is also the correct approach in Northern Ireland.

30 Clause 14: Do you have any further comments on what the regulations should cover or how the levy should be spent?

Any further comments?:

Clause 15

31 Clause 15: "Code of Practice". This Clause inserts a new Article 180A (Code of practice) into the 1985 Order and requires the Department to issue one or more mandatory Codes of practice about the manner in which facilities for gambling are provided. Do you feel that such a mandatory Code(s) of practice is appropriate?

Yes

Please explain your answer:

Putting in place a mandatory code of practice with effective enforcement and meaningful punishments for those who do not abide by its conditions would be an effective way to ensure that gambling operators act appropriately. It would also offer a more flexible means for the Department to regulate the activities of gambling providers than is currently available, since issuing new codes or amendments to old ones could be done without the expenditure of time needed for Assembly legislation to be passed. This is an important consideration in an industry like gambling, where new products are being developed all the time and industry practices are constantly emerging.

One shortcoming of this approach is that it does not appear to affect online gambling providers. This is important, given the growth of online gambling and the large proportion of gambling harm that is suffered by users of online services. Consideration should therefore be given to whether these codes of conduct could be extended to online gambling providers operating in Northern Ireland.

32 What kinds of Codes of practice do you think the Department should issue?

What kinds of codes of practice do you think the Department should issue?:

The Department's Codes of Practice should be aimed at ensuring that gambling providers offer appropriate protections to keep their customers safe from gambling harm. We believe that all operators should have a mandatory and legally enforceable 'duty of care' for all their customers which would require them to "take all reasonable steps to protect their customers from gambling harms".

There should also be a number of specific requirements including:

- being a part of the Multi-Operator Self Exclusion Scheme, allowing an individual to self-exclude easily and centrally from all land-based operators
- the operation of self-exclusion must be rigorously implemented with substantial fines for any operator breaching the measure
- implementation of strict affordability criteria, such as a 'soft cap' on monthly deposits to gambling operators
- age and ID verification should be stringent, requiring a delay of at least 72 hours before a new account can be verified
- there should be a complete ban on all 'free' bets, VIP schemes or any inducements to gamble
- no form of gambling on credit: all gambling should be account-based requiring payment by debit card
- all gambling products should carry clear warning signs about their addictiveness and danger
- all customers should be required to specify deposit and time limits at the start of any gambling session: these need to be approved, monitored and implemented by the operator

- gambling operators should be required to train their staff to recognise signs of gambling addiction and to take action to intervene and prevent any customer identified as being 'at risk' from gambling.
- operators should be required to report annually to the Department on incidents of gambling harms and how they are delivering effectively on their responsibility to protect their customers.

All of these measures must be underpinned by rigorous compliance measures and a clear tariff of fines and more severe punishments for breaches being applied.

33 Do you have any other comments to make on the Code(s) of practice?

Do you have any other comments to make on the Code of Practice?:

We are concerned that without effective enforcement, any Code of Practice will simply be ignored. This is evident in the field of gaming machines, where a lack of effective enforcement combined with hugely outdated legislation has led to gambling operators here simply choosing to follow the law in GB, rather than that of Northern Ireland.

We call for the creation of an NI equivalent of the UK Gambling Commission, resourced to proactively oversee and enforce regulation of the gambling industry.

We also call for the establishment of an independent Ombudsman with responsibility for protecting the individual consumer and wider public.

General Views & Comments and Second Stage of Reform

34 Do you have any other views or comments you wish to make in connection with this Bill?

Do you have any other views or comments you wish to make in connection with the current Bill?:

35 "Second Stage of Reform" Are there any issues that the Department plan to deal with in the second stage of reforms that you feel should be dealt with in this first Bill?

Not Answered

Please explain your answer:

36 What issues would you like to see addressed in the second stage of the reforms?

What issues would you like to see addressed in the second stage of the reforms?:

We welcome the proposals to introduce legislation to tackle some of the existing shortcomings and anomalies in gambling regulation in NI. It provides the chance to put an end to the anomalies that currently exist in NI, such as the probable illegal availability of Fixed Odds Betting Terminals in bookmakers shops.

However, the legislation does not address the most pressing issue in terms of updating regulation for gambling as it exists today. In particular, there is a clear and urgent need for new gambling legislation to bring NI up to date with the rapid developments in technology over the past 35 years. Existing legislation does not cover the current world of gambling with the huge growth in online gambling, in particular the rapid spread of the mobile phone, or the amount of activity which is now conducted off-shore.

Online gambling – where there is the ability to monitor all aspects of play across all operators in 'real time', to undertake detailed analysis and research based on real play data, and be able to intervene immediately to prevent harms – means that it should be possible to implement and enforce gambling regulation to prevent the vast majority of gambling harms. However, it is important to note that this will not happen without comprehensive regulation which is rigorously enforced. The gambling industry has shown itself to be incapable of 'self regulation' and putting the need for customer safety above the pursuit of profit.

Therefore, we believe that online gambling should be the focus for the next stage of legislation and regulation with the priorities being as follows:

PUBLIC HEALTH ISSUE

There is wide agreement that gambling must be treated as a public health issue. An evidence-based Public Health Approach focuses on prevention of a range of harms across the whole population and comprises:

- recognition that the public health problem arises not from 'faulty' individuals but a complex interplay between products, industry practices, policy, lived environments, and individual life circumstances and exposure.
- identifying risks and taking action on all factors that increase and decrease risk
- shared responsibility for action between legislators, regulators, operators, commissioners, providers of treatment and education, and individuals.

AFFORDABILITY

The development and implementation of strict affordability criteria are central to reducing gambling harms. There is wide acknowledgement that preventing gambling companies taking more than a fixed limit of a gambler's income would have an enormous impact in reducing the likelihood of the development of addiction and also in limiting the scale of financial damage that can be done to an individual. The Social Market Foundation and Centre for Social Justice have recently published reports which presented practical approaches to setting and implementing affordability limits. We believe that an 'affordability trigger' on maximum monthly deposits of around £100, with the flexibility to allow higher limits for high wealth individuals, is around the

right level.

There is a good deal of detailed work which needs to be done to establish a robust system of affordability but the core principles must include:

- a single customer view – to allow the totality of an individual's gambling to be tracked
- independence from the industry – should not allow direct operator-to-operator sharing of information and data: there needs to be an independent central organisation that receives, analyses and processes all real-time play and other data from operators
- transparency – decisions on affordability, 'flagging' of individuals or types of gambling must be based on independently developed and verified algorithms which must be available for public scrutiny
- involvement of banks and other financial institutions – it is likely that data from a variety of sources will be required and there may be a role for banks and other institutions to implement some solution

GAMBLING COMMISSION

The new legislation should also establish a NI equivalent of the UK Gambling Commission to oversee and enforce regulation of the industry. It needs to be an organisation which is resourced to be able to be proactive in identifying breaches of regulation rather than relying on customer complaints. It needs to be vigorous and bold in imposing substantial penalties, including removing licences, when operators fail in their obligations. The new legislation should include recognition the wider harms that gambling causes to individuals and society – which go beyond "crime and disorder", "fairness" or "protecting the vulnerable" highlighted in the UK Gambling Commissions mission.

OMBUDSMAN

Legislation will also need to establish an Independent Ombudsman with responsibility for protecting the individual consumer and wider public. In order to ensure that the individual consumer is protected in law, new legislation should also impose a "duty of care" on all operators to allow full right of redress for individuals harmed by gambling companies.

CONSUMER REDRESS

Legislation needs to recognise that harms extend far beyond individuals to include family, friends, employers and the wider community. It needs to recognise that all of these groups need protection and should have the right to challenge the actions of individual companies and seek redress.

PRODUCTS

All products should be subject to classifications and licensing conditions based on the harm they cause. Dangerous products must be made safer, including through slowing down speeds of play and the application of stake limits. All product safety requirements need to go further than testing for "fairness" and focus on the addictive qualities of individual products. We should operate a "precautionary principle" so that products must be proved to be safe/non-addictive before they can be marketed.

AVAILABILITY

Online and physical availability need to be strictly regulated according to public health principles, for example:

- robust methods for establishing and implementing source of wealth and affordability limits are central to preventing gambling problems developing, both to reduce the likelihood of addiction and to limit financial harms done to an individual
- gambling on credit should not be allowed.
- consumers must be able to self-exclude from both physical and online gambling permanently and free of charge.
- local authorities may wish to make licensing decisions for individual premises based on wider social and financial impacts.

EDUCATION/AWARENESS RAISING

Gambling barely features in the current curriculum at GCSE level and there are no reference points to gaming and gambling in primary schools. Therefore, age appropriate independent education and awareness raising should be incorporated into the school curriculum and made available more widely to young people and parents. These programmes must be evidence based and not focused on teaching young people about 'odds and probability', rather they must consider addictiveness of products, 'loot boxes', marketing and other industry practices, and the harms that gambling can cause. They need to make the link between gaming and subsequent gambling involvement.

CCEA review their examination specifications every few years and a new look at the Learning for Life & Work GCSE specification which is a mandatory subject in all secondary schools in NI is due very soon. We have lobbied and will continue to lobby the relevant officers within CCEA about the need to include gambling as an essential addition of the addiction element with the specification.

ADVERTISING AND MARKETING

New legislation must end all gambling advertising and marketing which normalise gambling, successfully encourage people to gamble while providing false information about fairness and safety, and ramp up addiction by directly targeting those suffering gambling disorder or 'at risk'. Gambling should be treated the same as tobacco in terms of advertising and sponsorship of sporting events, all of which should be banned.

The current massive spend on traditional advertising visible to the public is dwarfed by the spend on direct marketing and targeting. In 2018, GambleAware estimated that the industry spent £1.5bn on marketing in the UK, almost half of which was direct marketing, with a further 20 per cent through 'affiliates' and 10 per cent on social media.

Therefore, the remit of the Advertising Standards Authority does not extend across the vast bulk of gambling marketing. New legislation needs to include authority for all forms of gambling marketing to be regulated. The restrictions on marketing should be extended to ban all forms of 'free bets/spins' which are aimed at inducing people to gamble.