

2016 Northern Ireland Gambling Prevalence Survey

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Statistics and Research Agency

Reader Information

Purpose	This publication presents the results of a Department for Communities' 2016 Northern Ireland Gambling Prevalence Survey. The main themes explored in the survey are: participation in gambling types; attitudes to gambling and; problem and at risk gambling.	Target audience	DfC officials, academics, the general public, media and community group stakeholders.
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Issued by	Analytical Services Unit (DfC), Level 1, Lighthouse Building, 1 Cromac Avenue, Gasworks Business Park, Ormeau Road, Belfast, BT7 2JB Telephone: 028 90 829255	Copyright	This publication is Crown copyright and may be reproduced free of charge in any format or medium. Any material used must be acknowledged, and the title of the publication specified.
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1. Introduction

This paper reports the findings of the 2016 Northern Ireland Gambling Prevalence Survey. This is the second survey of its kind to be carried out in Northern Ireland, following up on the 2010 Northern Ireland Gambling Prevalence Survey.

The survey was commissioned by the Department for Communities (DfC). The Department has strategic responsibility for, amongst other areas, the development of policy and legislation on gambling in Northern Ireland. Gambling in Northern Ireland is currently regulated by the Betting, Gaming, Lotteries and Amusements (Northern Ireland) Order 1985.

The objectives of the 2016 survey were to:

- monitor how gambling prevalence has changed since the previous study in 2010;
- monitor changes in public attitudes to gambling;
- monitor the overall rate of at-risk and problem gambling and;
- assess the progression of gambling methods since the last study was undertaken

The report can be accessed on the Department for Communities website.

<https://www.communities-ni.gov.uk/topics/other-dfc-research>

A summary of the technical aspects of the survey are contained in the annexes. A further Technical Notes document has been produced alongside this report which provides more details on methodological aspects of the survey and includes information on sampling, questionnaires, weighting strategies and margins of error.

About Analytical Services Unit

Analytical Services Unit (ASU) provides an independent statistical and research service to the Department for Communities (DfC) in Northern Ireland. The work of ASU informs policy, planning and decision making in the areas of social security, child maintenance and pensions, employment services, as well as housing, urban regeneration, culture, arts and leisure, community development, voluntary activity and social policy.

The statisticians within ASU are seconded from the Northern Ireland Statistics and Research Agency (NISRA) and our statistics are produced in accordance with the principles and protocols set out in the Code of Practice for Official Statistics.

This report has been produced by the Community Regeneration team, a team within ASU whose role is to undertake research and statistical analysis relating to social policy as well as urban regeneration.

Data notes

There were 1,004 respondents who completed the survey, but not all questions were necessarily completed by all respondents. Any table or figure where the number of responses (n) differs from 1,004, it has been noted.

Any statements regarding differences between groups such as males and females, different age groups etc. are statistically significant at the 95% confidence level, unless otherwise stated.

Due to the low numbers of respondents classified as being in the 'problem gambler' group, 'moderate risk gamblers' and

'problem gamblers' were grouped together for some analyses.

Responses to the survey were weighted to remove bias, making the results more reflective of the demographics in Northern Ireland. Full details of this are available in the Technical Notes released with this publication.

Figures in tables and graphs may not sum to 100% due to rounding and/or multiple response questions.

Please consult the annexes in this report and the separate Technical Notes document for more details on methodology.

Revision of 2010 figures

For the 2016 survey, ASU have reviewed and updated the methodology that was used for the 2010 survey. These include:

- a different weighting technique
- improved data cleaning
- changes to how missing values are treated for Problem Gambling Severity Index

- changes to how missing values are treated for the attitudes to gambling scale

To ensure all values are comparable between the two surveys, 2010 estimates for key figures have been revised from those previously published.

Further details are provided in the Annex 2 and the separate Technical Notes document released alongside this publication.

Acknowledgements

ASU and the Department wish to thank all the respondents in households across Northern Ireland who agreed to be interviewed.

We would also like to thank the staff and interviewers at Perceptive Insight NI who managed and carried out the fieldwork.

Contact point

If you have any comments or questions about the survey please contact us at:

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2. Summary of main findings

This section is intended to give an overview of the main results from the survey. It is intended for use by all users, ranging from those with a general interest in statistics to expert users in gambling prevalence.

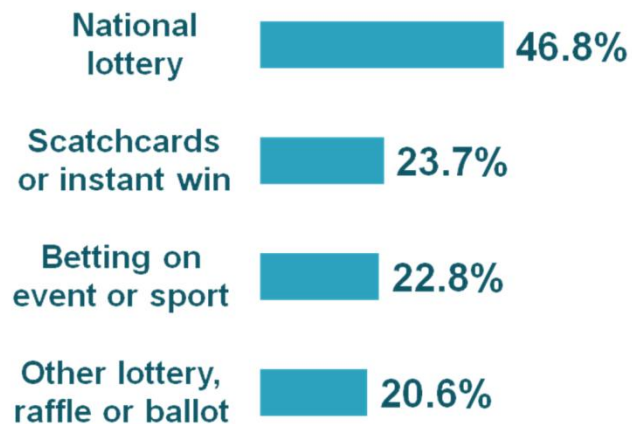
Please note that all figures are subject to statistical uncertainty. Where appropriate, the confidence intervals are provided in the “Detailed Findings”, Sections 3 to 8, as well as in the ‘Downloadable tables’ released alongside this report.

Gambling participation

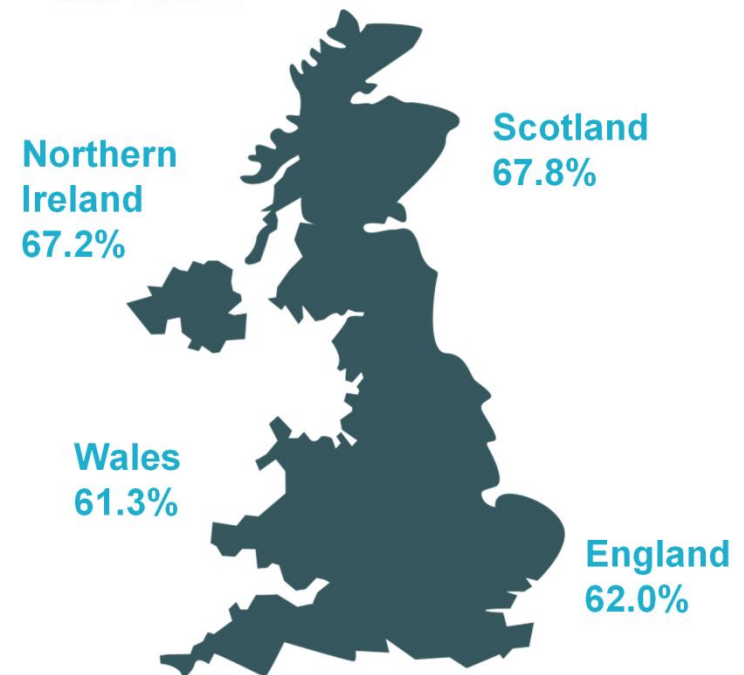
The number of people who had participated in gambling in the last 12 months has fallen since 2010



The most common forms of gambling that people participated in were:



Northern Ireland has a comparable gambling participation rate to Scotland, but higher than England and Wales



At-risk and problem gambling



2.3%

of respondents were identified as problem gamblers

86.1%



Non-problem Gambler

6.7%



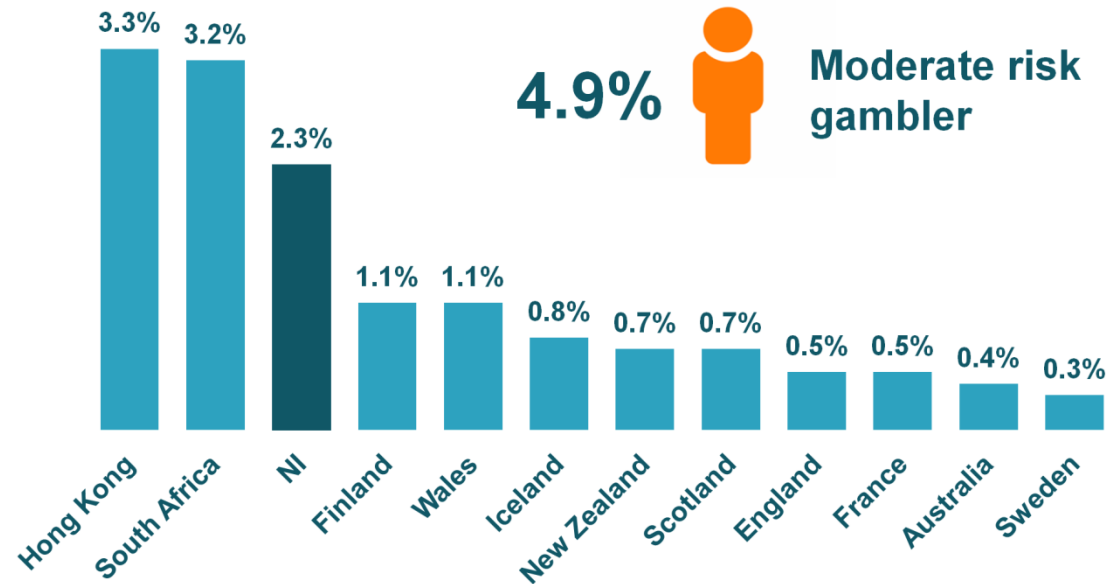
Low risk gambler

4.9%



Moderate risk gambler

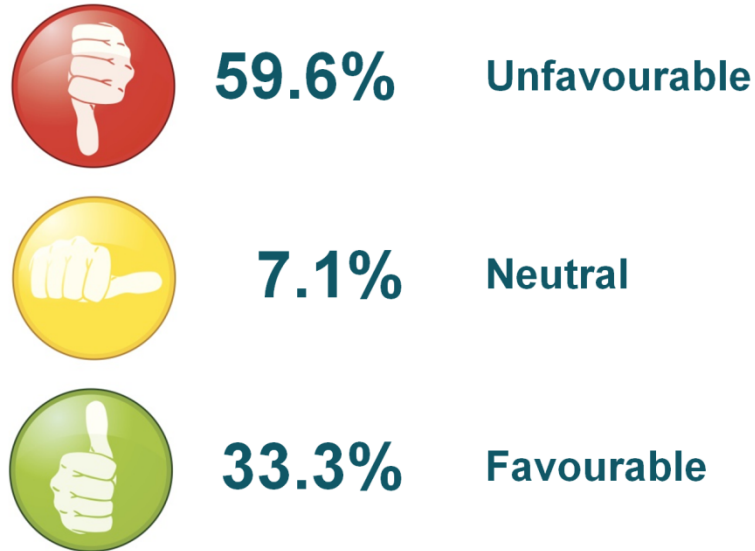
Males were more likely to be a moderate risk or problem gambler



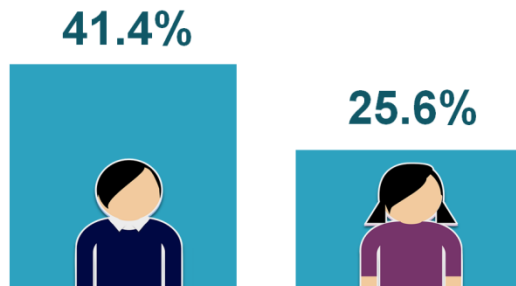
Problem gambling in Northern Ireland is high relative to other countries who have performed comparable surveys

Attitudes to gambling

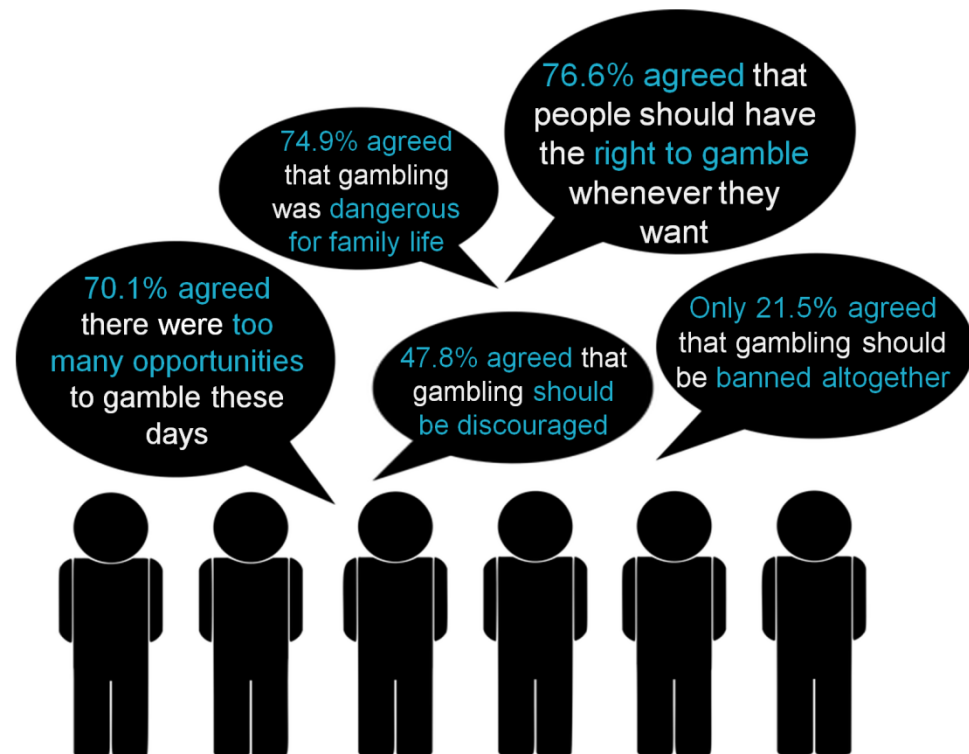
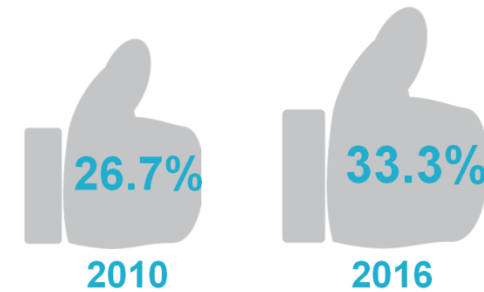
The majority of respondents had an overall unfavourable attitude towards gambling



More male respondents had favourable attitudes to gambling compared to female respondents



Favourable attitudes increased since 2010



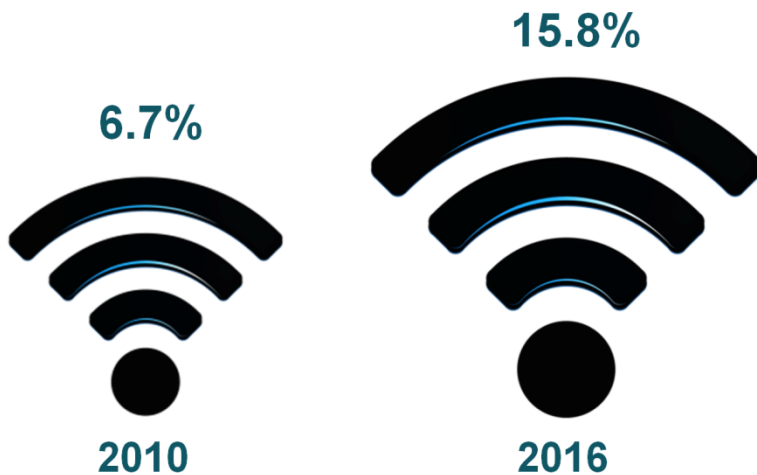
Method of gambling



95.2%

of gamblers had gambled **in person** in the last year

The proportion of people who had gambled **online** in the last year has increased between 2010 and 2016



How much people spend*

In the last 7 days....

almost half of respondents had spent **nothing** on gambling

one in ten had spent **between £5 and £10**



Average spend in the last 7 days

Non-problem gambler



£5.08

Low risk gambler



£11.46

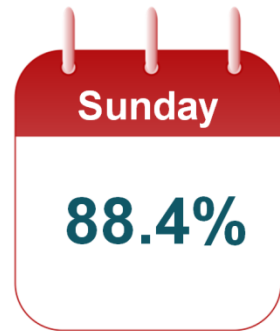
Moderate risk & Problem gamblers



£47.33

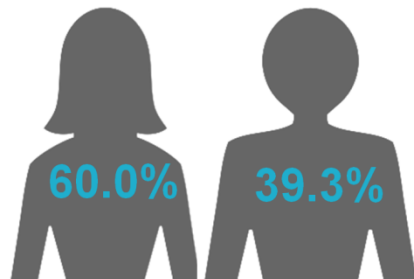
*Note that "spend" is defined as 'money risked' and does not take account of any money won

Sunday gambling



The majority of all respondents 'never bet on a Sunday'

Half of respondents think bookmakers should not open on a Sunday

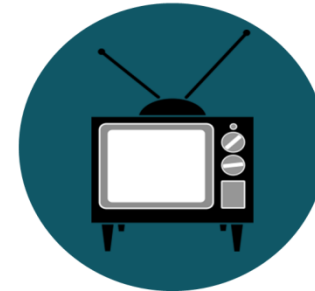


More females than males disagree or strongly disagree that bookmakers should open on Sunday

Gambling advertisements

Top 3 most common gambling advertisements seen by respondents in the past month

TV adverts



80.0%

Online adverts



47.3%

Sponsorship



36.7%

Detailed findings

The following sections show the full findings of the survey. They are intended for use by those who require more detail or have a more specific interest in gambling prevalence in Northern Ireland.



3. Gambling participation

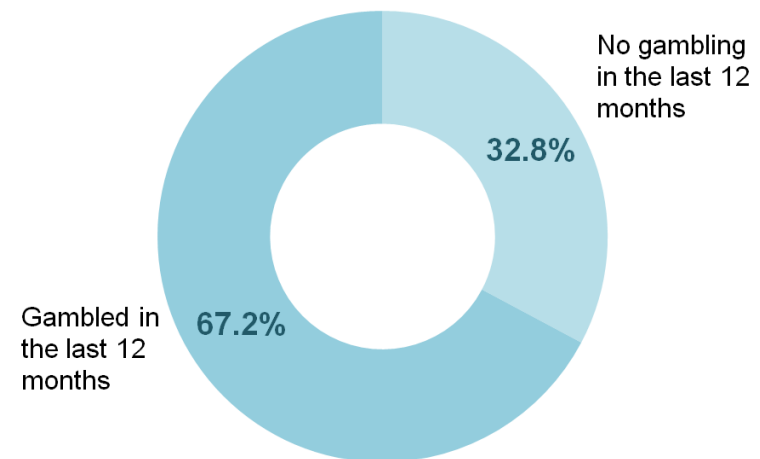
Respondents were provided with a list of ten gambling types and asked whether they had spent money on these within the past 12 months. For the purposes of this report, if a person had spent money on any gambling type in the past 12 months, they were deemed to have participated in gambling. Money 'spent' on gambling was defined as an amount of money risked, i.e. this does not take into consideration any earnings or losses from the activity.

The gambling types used in the list were agreed in the development process with Social Policy Unit (SPU) in the Department for Communities (DfC) and are consistent with other gambling prevalence surveys. An 'other' option was also provided to enable respondents to list another type of gambling if they felt it wasn't covered by any of the ten categories.

Overall participation

Just over two thirds of respondents (67.2%) said they had gambled in the last 12 months (Figure 3.1). This is a decrease since the 2010 survey (79.8%) and is statistically significant.

Figure 3.1: Gambling participation in the last 12 months



Gambling participation in other parts of the United Kingdom

When compared to other regions of the United Kingdom, the level of participation in gambling in Northern Ireland is higher than the rates in England and Wales, but similar to the most recent participation rate for Scotland (Table 3.1).

Table 3.1: Gambling participation by region

Area	Year	Percentage
Wales	2015	61.3%
England	2012	62.0%
Northern Ireland	2016	67.2%
Scotland	2015	67.8%

Source: Scotland – www.gov.scot

Wales and England – www.gamblingcommission.gov.uk

Participation by gender and age

The survey found that males (70.5%) were more likely to have gambled in the last year than females (64.1%) (Figure 3.2). Whilst this difference between genders was not statistically significant, similar patterns were seen in the 2010 survey with more males participating (85.4%) in gambling than females (74.6%).

For respondents, gambling participation increased with age for the first 3 age groups before declining after the 35-44 age group. As can be seen in Figure 3.3, most of these changes are not statistically significant.

The oldest age group (65+) were least likely to have participated in gambling, with only half (50.6%) reporting that they had gambled in the last 12 months. This difference was statistically significant compared with the groups aged 25 and over.

Figure 3.2: Gambling participation by gender

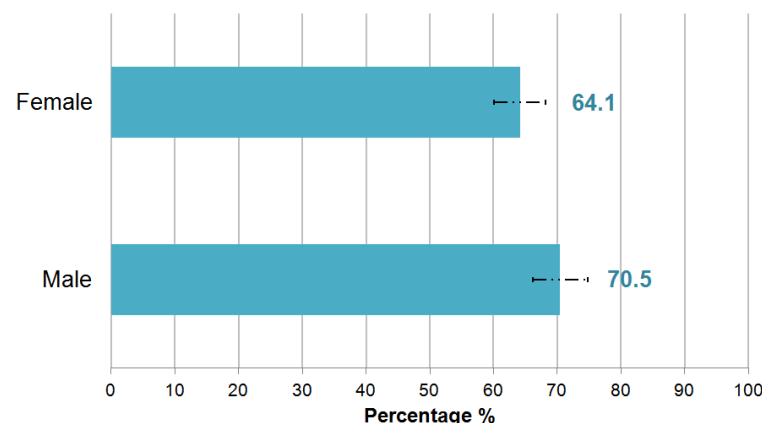
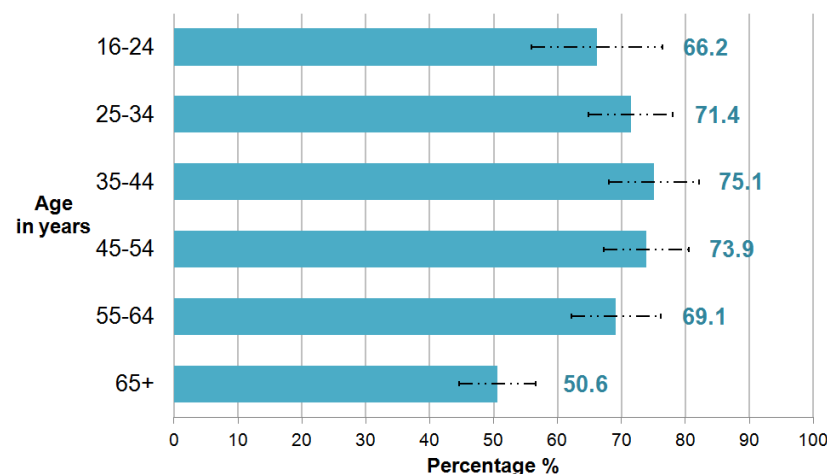


Figure 3.3: Gambling participation by age



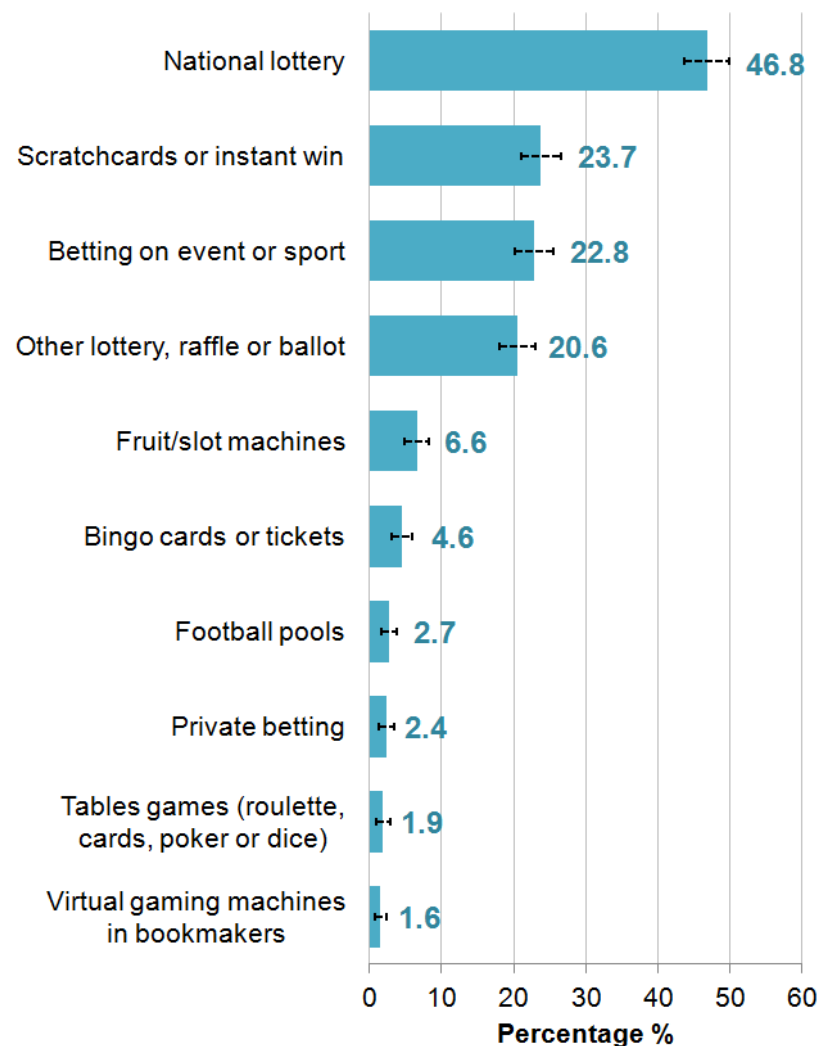
Types of gambling

Participants were provided with a list of ten types of gambling and asked which of these they had spent money on during the last 12 months.

Figure 3.4 shows that 'tickets for National Lottery draws (including lotto, Euromillions, Thunderball, Daily Play and Hotpicks)' was clearly the most popular gambling type with nearly half (46.8%) of respondents reporting that they had purchased tickets in the last 12 months.

The next most popular types were 'scratchcards or instant win games' (23.7%), 'betting on any event or sport' (22.8%) and 'tickets for any other lottery, raffle or ballot' (20.6%).

Figure 3.4: Gambling participation by gambling type



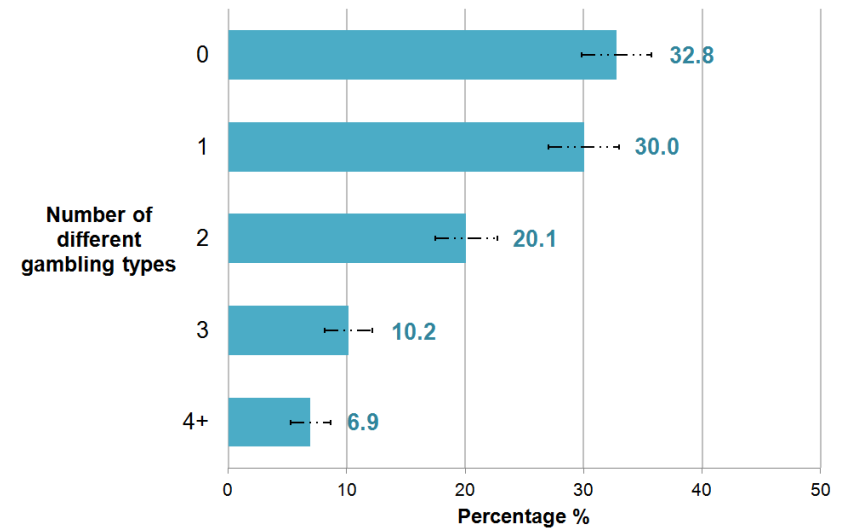
Number of different gambling types

Figure 3.5 shows the number of different gambling types that respondents had participated in during the previous 12 months.

Approximately half of respondents had participated in either one or two different types of gambling.

Fewer than one in six people (17.1%) had engaged in three or more types of gambling.

Figure 3.5: Number of different gambling types



Participation by different characteristics

Those respondents who identified as 'Protestant or other Christian' (58.7%) were less likely to have gambled than 'Catholic' (77.1%) respondents and this difference is statistically significant (Figure 3.6).

There was no statistical significant difference between those who identified as having 'other or no religion' and the other two groups.

The respondents of the survey who were 'widowed' (53.9%) were less likely to have gambled than those in the other categories (Figure 3.7). This difference is likely to be related to this category typically consisting of people in older age groups.

All other groups were broadly similar in participation rates, with no statistical significant difference between the groups.

Figure 3.6: Participation by religion

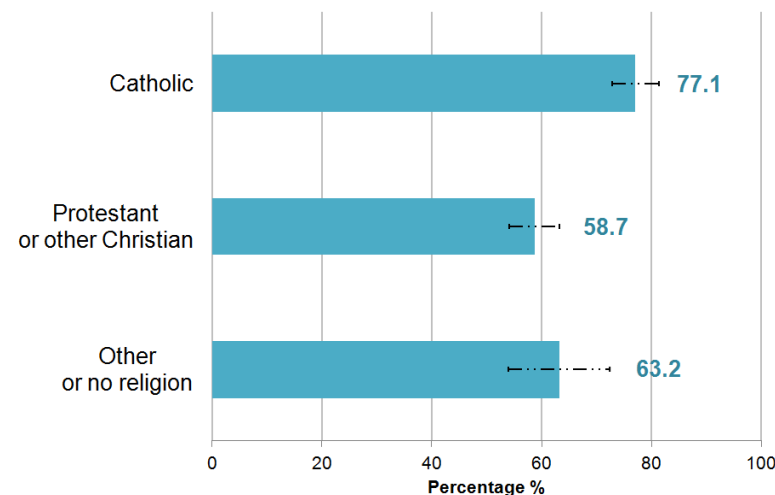


Figure 3.7: Participation by marital status

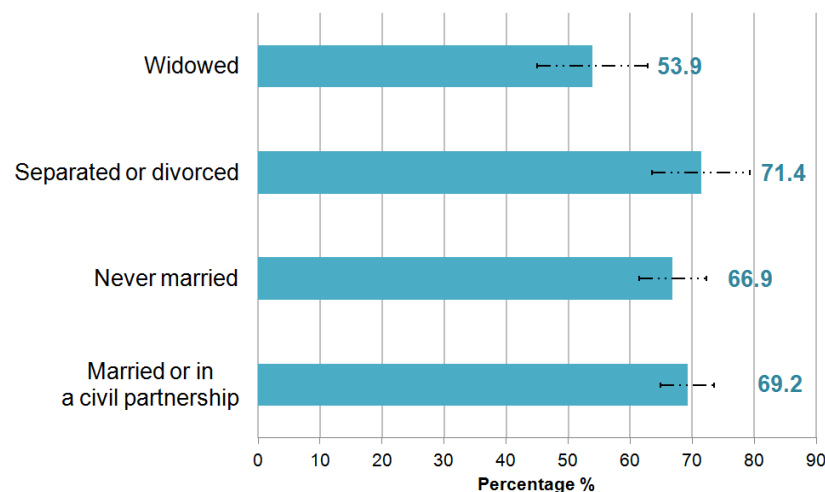


Figure 3.8 shows that there were no statistically significant differences between any of the educational attainment groups. However, the largest participation rate was found to be among those whose highest educational level attainment was 'GCSE or equivalent' (72.9%) and the lowest rate among those who held 'no qualifications' (62.3%).

Those who indicated they were 'retired' (52.6%) were less likely to have gambled than the other two groups. This again is likely linked with this category being made up of an older age group, who were less likely to have gambled in the last 12 months (Figure 3.9).

Respondents who were 'unemployed' (66.5%) were less likely to have gambled than those who were 'employed/self employed' (74.6%). However, this difference was not statistically significant.

Figure 3.8: Participation by highest educational attainment

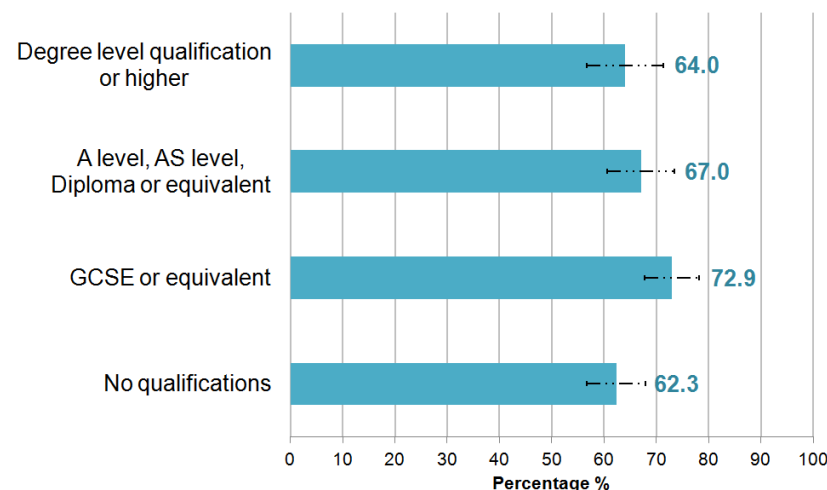
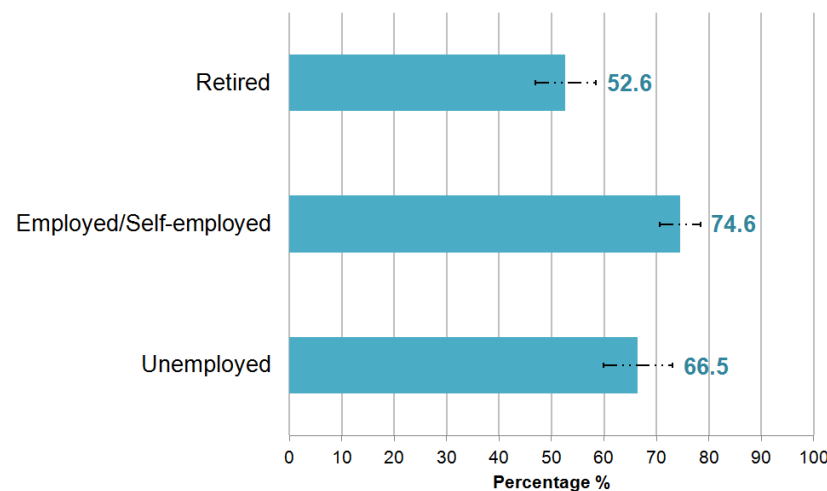
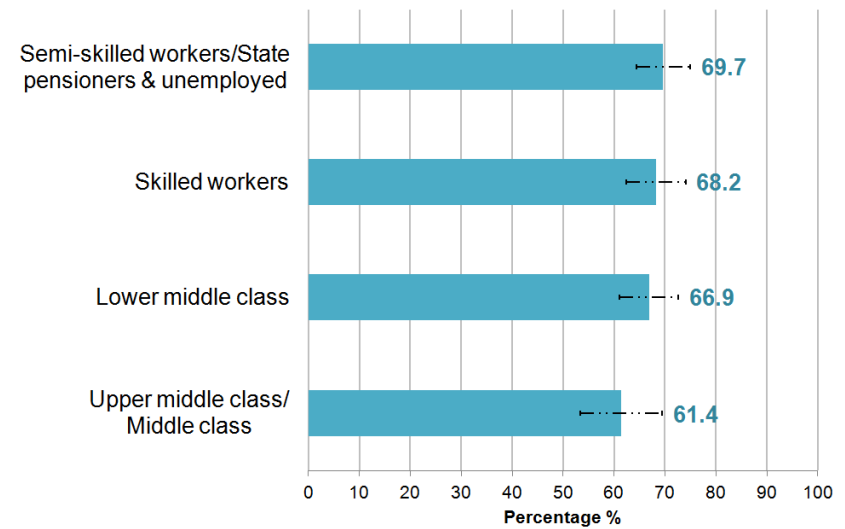


Figure 3.9: Participation by employment status



There were no statistically significant differences between the socio economic groups in relation to gambling participation. However, 'upper middle class/middle class' (61.4%) was the group least likely to have gambled based on responses to the survey (Figure 3.10).

Figure 3.10: Participation by socio economic status



4. At-risk and problem gambling

Problem gambling is defined as ‘gambling to a degree which compromises, disrupts or damages family, personal or recreational pursuits.’ The prevalence of problem gambling was assessed using a validated population measure which is used globally, the Problem Gambling Severity Index (PGSI).

The PGSI consists of nine questions on areas such as betting more than can be afforded, “chasing losses”, financial difficulties caused by gambling and associated health problems.

Respondents are asked to assess how relevant each question is to their own gambling habits over the previous 12 months. Each question is assessed on a four-point scale: ‘never’; ‘sometimes’; ‘most of the time’; ‘almost always’. These are scored from zero to three based on the response.

All nine responses are summed to give a total score ranging from zero to 27. The total score determines which PGSI group an individual is classified as belonging to. Table 4.1 shows the scores and interpretation of each PGSI group. A score of zero represents a non-problem gambler, whereas a score of eight or more represents problem gambling.

Table 4.1: PGSI groups

Group		Interpretation
Total Score		
0	Non-problem gambler	No identified consequences
1-2	Low risk gambler	Low level of problems with few or no identified negative consequences.
3-7	Moderate risk gambler	Moderate level of problems leading to some negative consequences
8 or more	Problem gambler	Problem gambling with negative consequences and a possible loss of control.

Overall PGSI score

Overall, there was no statistically significant change in the proportion of any PGSI group when comparing the 2010 and 2016 surveys (Figure 4.1).

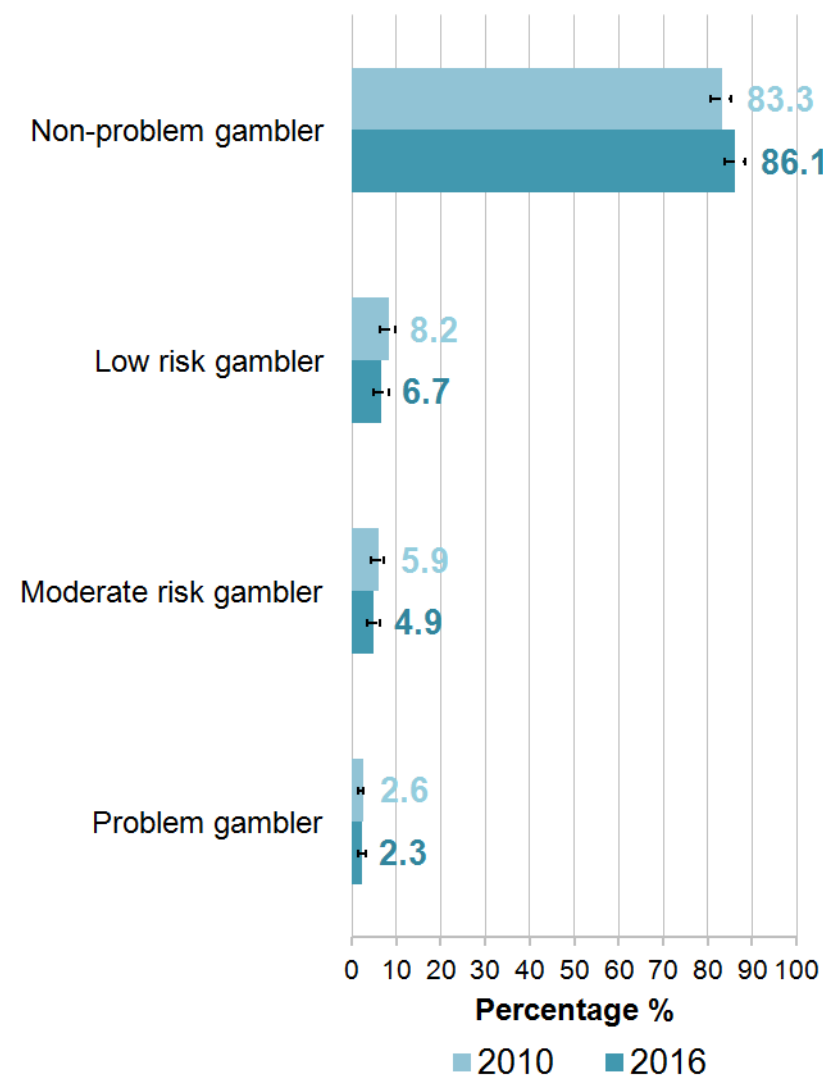
Most respondents (86.1%) from the 2016 survey were considered to be 'non-problem gamblers' based on their PGSI score. Gambling is considered to have no identified consequences for this group.

Approximately one in 15 respondents (6.7%) were identified as 'low risk gamblers' with few or no negative consequences.

Almost one in 14 respondents was considered to be either a 'moderate risk gambler' (4.9%) or 'problem gambler' (2.3%). These groups are considered to experience at least some negative consequences from their gambling, with problem gamblers also experiencing a possible loss of control.

Problem gambling levels between 2010 and 2016 are broadly similar, with no significant difference between the two figures.

Figure 4.1: Comparison of PGSI scores in 2010 (n=1031) and 2016 (n=1003)



Problem gambling around the world

Problem gambling rates from other countries, that had performed comparable surveys, are presented in Figure 4.2.

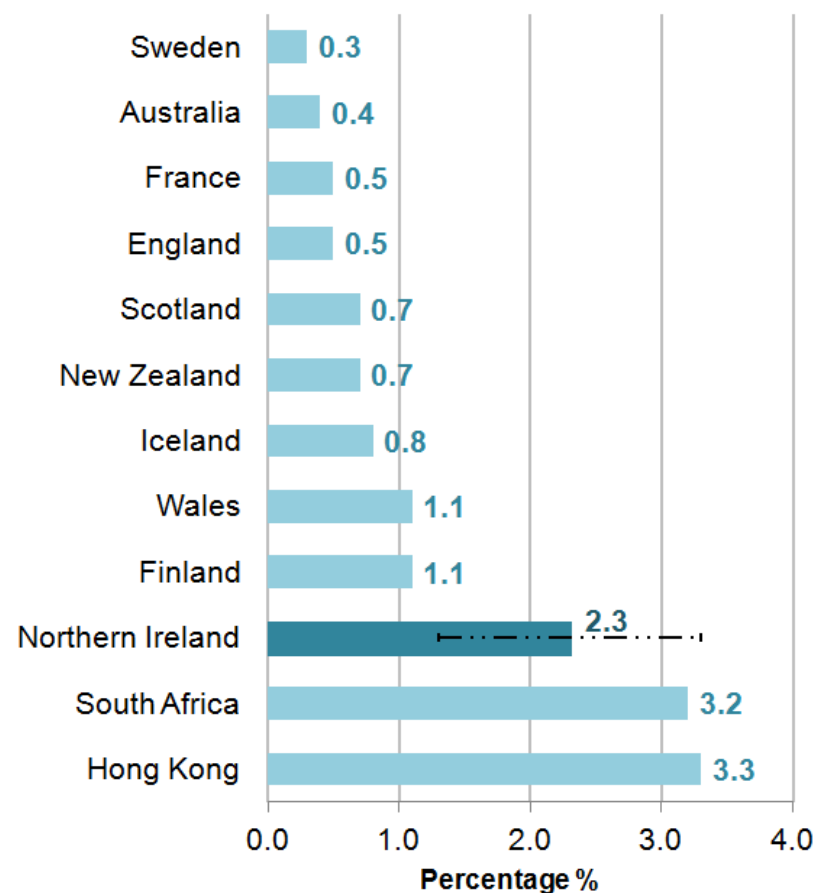
Prevalence rates of problem gambling in these countries vary from 0.3% to 3.3%. Northern Ireland has one of the higher estimated rates of problem gambling at 2.3%.

This is not a complete global comparison as only studies from the last ten years (2007-current) which measure past-year problem gambling prevalence rates at a national level have been included. In addition, only those which used comparable screening tools to measure problem gambling (PGSI and DSM-IV measures) are presented. However, variations in other elements of the methodologies such as sample size (n) and interview type exist between the surveys.

Confidence intervals are not readily available for all of these figures so we have not made an assessment on whether any differences are statistically significant.

Care should be taken when comparing these figures.

Figure 4.2: Comparison of PGSI scores globally



PGSI score by gender and age

The survey found that a higher percentage of males compared with females were categorised as ‘moderate risk gamblers’ and ‘problem gamblers’. The difference between the genders was statistically significant in all categories apart for the ‘low risk gamblers’ (Figure 4.3).

Although the majority of respondents across all age groups were considered to be ‘non-problem gamblers’, the numbers of those who fell into this category increased with increasing age (Figure 4.4). The number of older adults who were ‘non-problem gamblers’ was statistically significantly higher when compared with those in the youngest age group (16-34 years).

A reverse trend was seen in the ‘low risk gambler’, ‘moderate risk gambler’ and ‘problem gambler’ categories, with higher numbers seen in the younger age group (16-34 years). However these differences between the oldest and youngest age groups were only significantly different in the ‘moderate risk gambler’ category.

Figure 4.3: Comparison of PGSI scores by gender (n=1003)

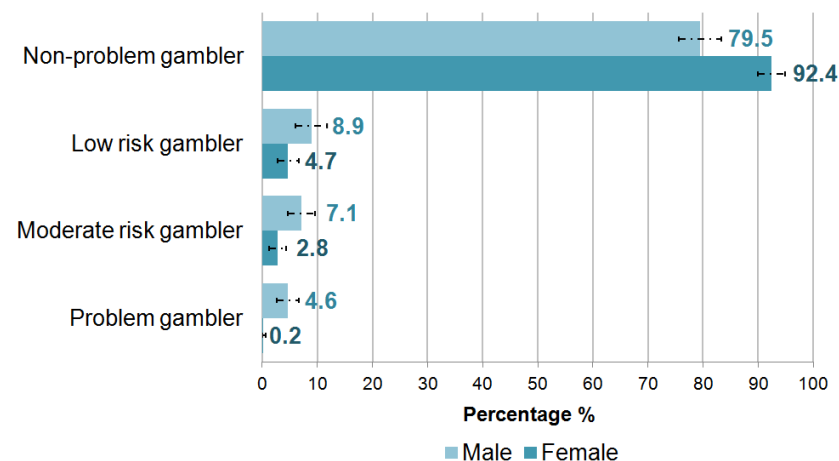
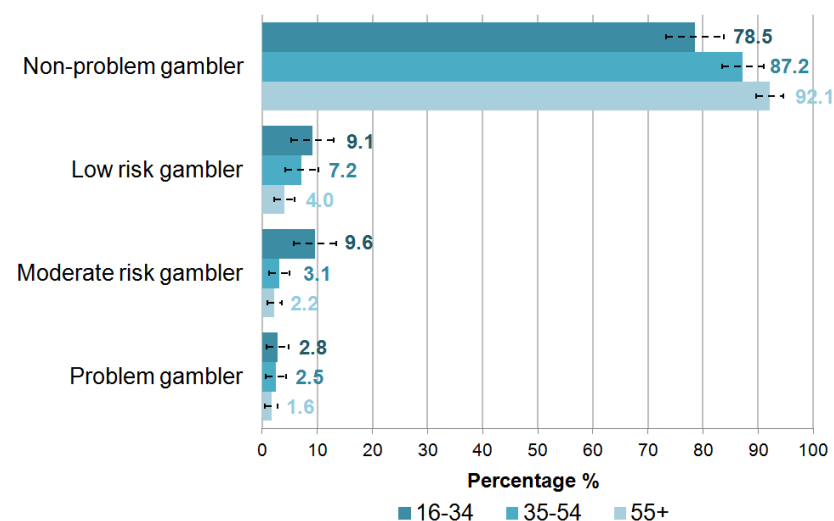


Figure 4.4: Comparison of PGSI scores by age (n=1003)



PGSI score by level of participation in gambling types

The highest proportion of ‘non-problem gamblers’ (37.2%) had not participated in any type of gambling in the past 12 months (Table 4.1). Conversely the lowest proportion of ‘low risk gamblers’ (7.4%) and moderate risk/problem gamblers (3.8%) fell into this category.

A third of moderate risk/problem gamblers (33.4%) participated in 4 or more different gambling types in the past 12 months, compared with 15.5% of ‘low risk gamblers’ and just 4.1% of ‘non-problem gamblers’.

These results indicate that respondents categorised as moderate risk/problem gamblers are more likely to have participated in a larger number of different types of gambling compared with respondents categorised as ‘non-problem gamblers’.

This difference between moderate risk/problem gamblers and ‘non-problem gamblers’ was statistically significant across all categories apart from those who had participated in 1 and 2 types of gambling in the past 12 months.

Table 4.1: PGSI category by level of participation in gambling types (n=1003)

	Number of different gambling types in the past 12 months (%)				
	0	1	2	3	4+
PGSI Category					
Non-problem gambler	37.2	31.0	20.2	7.6	4.1
Low risk gambler	7.4	28.6	27.9	20.6	15.5
Moderate risk gambler/ Problem gambler	3.8	19.0	11.7	32.1	33.4

Individual PGSI statements

Responses to the individual PGSI questions demonstrate that a minority of **all respondents** considered that they had experienced the issues associated with problem gambling in the past 12 months. Figure 4.5 shows the level of agreement to each question.

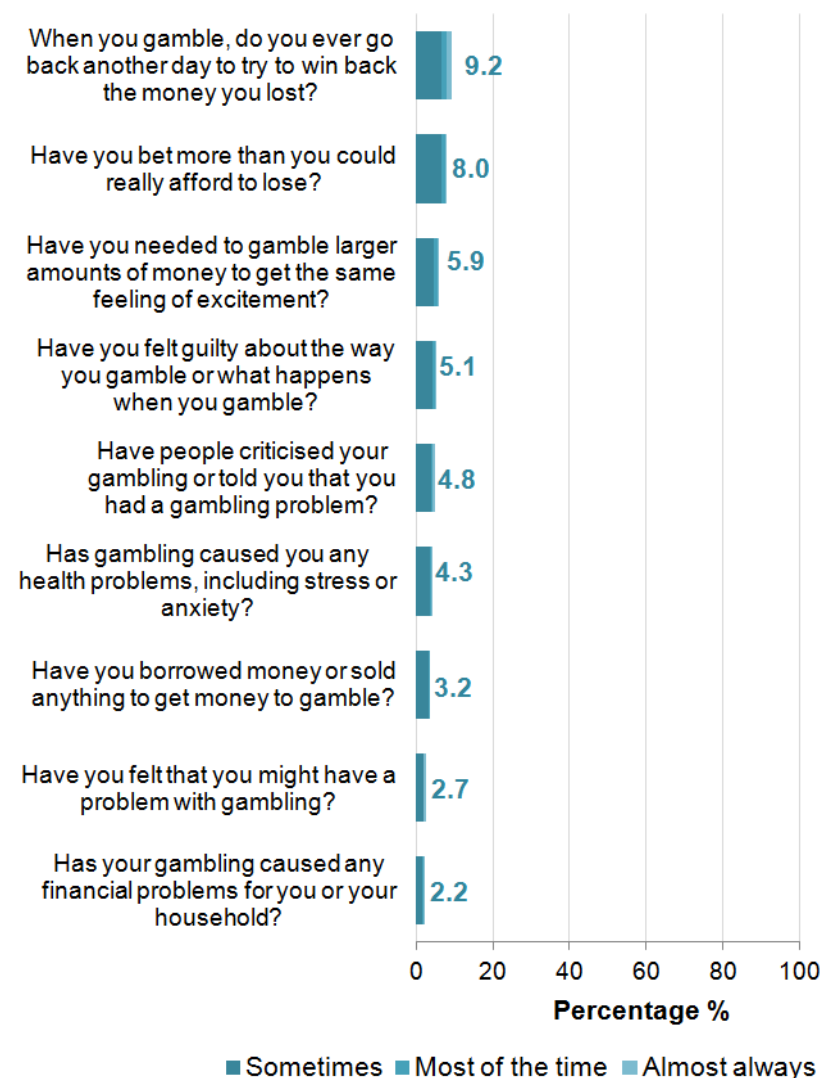
Between 90.7% and 97.5% said they had 'never' done any of these behaviours in the past 12 months.

The most common behaviour exhibited by respondents was going back another day to try and win back money lost, with approximately one in 11 respondents (9.2%) saying they had done this in the last 12 months.

Approximately one in 12 respondents (8.0%) said they had bet more than they could afford to lose and one in 17 (5.9%) said they 'needed to gamble larger amounts to get the same feeling of excitement' in the last 12 months.

Figure 4.5: Agreement to PGSI questions for all respondents

(refusals and 'never' not included in graph)



There is a significantly higher proportion in agreement when we look at the individuals who are classified as either **‘moderate risk gamblers’** or **‘problem gamblers’** (Figure 4.6).

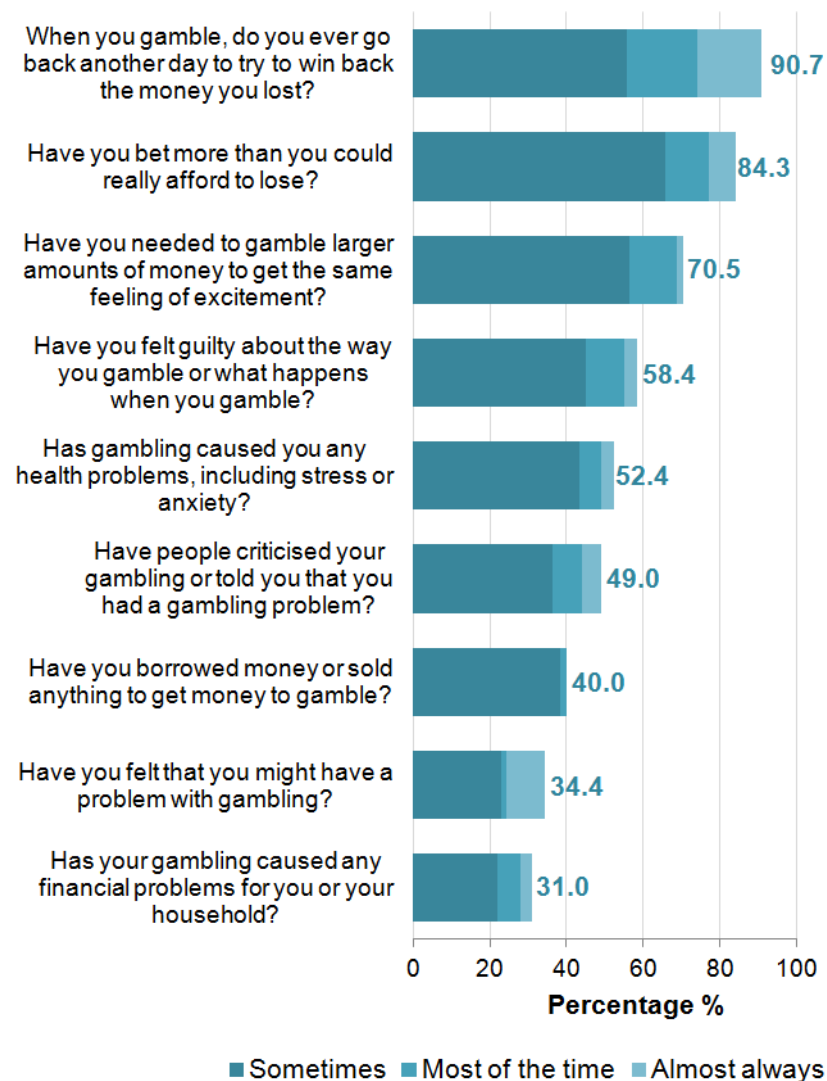
The large majority of moderate risk / problem gamblers said they had “chased losses” (90.7%), ‘bet more than they can really afford to lose’ (84.3%) and had ‘needed to gamble larger amounts to get the same feeling of excitement’ (70.5%) in the last year.

Over half (58.4%) admitted to feeling guilty about their gambling and almost half (49.0%) had been ‘criticised or told they have a gambling problem’.

Approximately half (52.4%) had experienced ‘health problems’ and almost a third (31.0%) said that their ‘gambling caused financial problems’ for them or their household in the last year.

Interestingly only around a third (34.4%) felt they might have a problem with gambling.

Figure 4.6: Agreement to PGSI questions for moderate risk and problem gamblers (n=64, refusals and ‘never’ not included in graph)



Moderate risk/problem gamblers by different characteristics

Those respondents who identified as 'Protestant or other Christian' (4.0%) or having an 'other religion or no religion' (2.3%) were less likely to be moderate risk/problem gamblers when compared with 'Catholic' respondents (11.9%) (Figure 4.7).

The difference between 'Catholic' respondents and the other two groups was statistically significant and a similar pattern was seen in 2010.

Figure 4.8 shows that respondents who had been 'separated or divorced' (14.7%) or 'never married' (10.6%) were more likely to be categorised as moderate risk/problem gamblers compared with those who were 'married or in a civil partnership' (2.5%) or those who were 'widowed' (2.4%).

These differences were statistically significant.

Figure 4.7: Proportion of moderate risk/problem gamblers by religion (n=64, refusals not shown in graph)

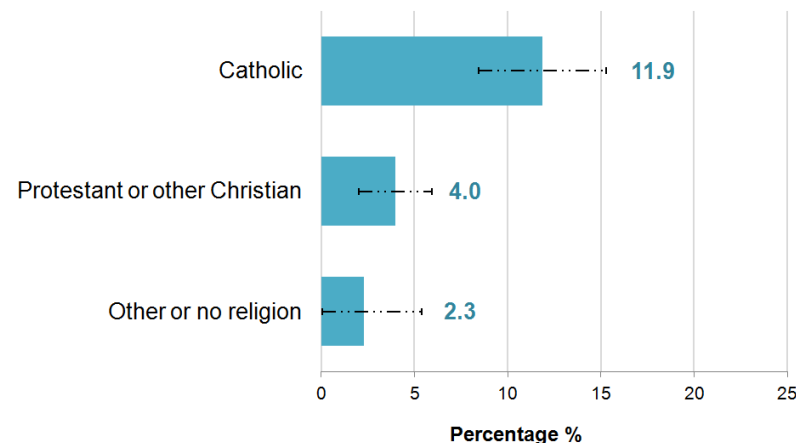
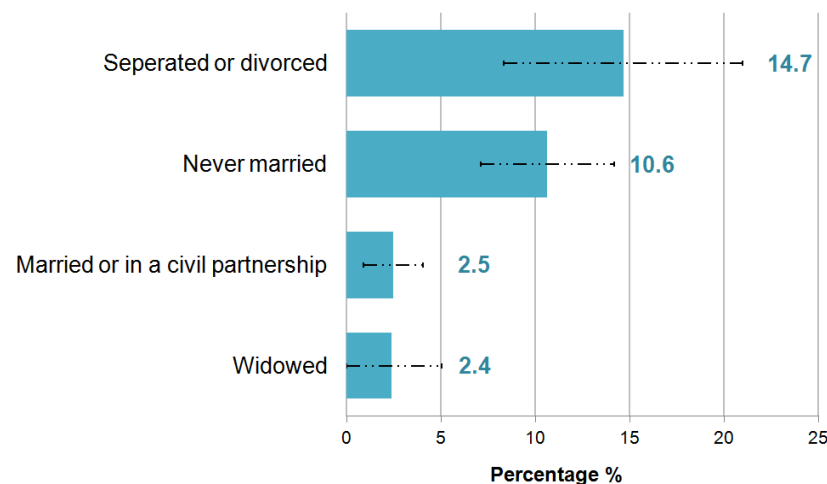


Figure 4.8: Proportion of moderate risk/problem gamblers by marital status (n=64, refusals not shown in graph)



The survey found that the likelihood of being a moderate risk/problem gambler reduced considerably for those participants with higher education levels.

Respondents with education levels of 'A level, AS level, Diploma or equivalent' (3.2%) and 'Degree level qualification or higher' (2.4%) were less likely to be moderate risk/problem gamblers than those with 'no qualifications' (10.5%) or 'GCSE or equivalent' (10.2%).

When we compare the two lowest education levels with the two highest education levels, the differences are statistically significant (Figure 4.9).

'Unemployed' (12.6%) respondents were more likely to be 'moderate risk/problem gamblers' than those who were in 'employment/self-employment' (6.9%). However, this difference was not statistically significant (Figure 4.10).

'Retired' respondents were less likely to be moderate risk/problem gamblers than the other two groups.

Figure 4.9: Proportion of moderate risk / problem gamblers by educational attainment (n=64)

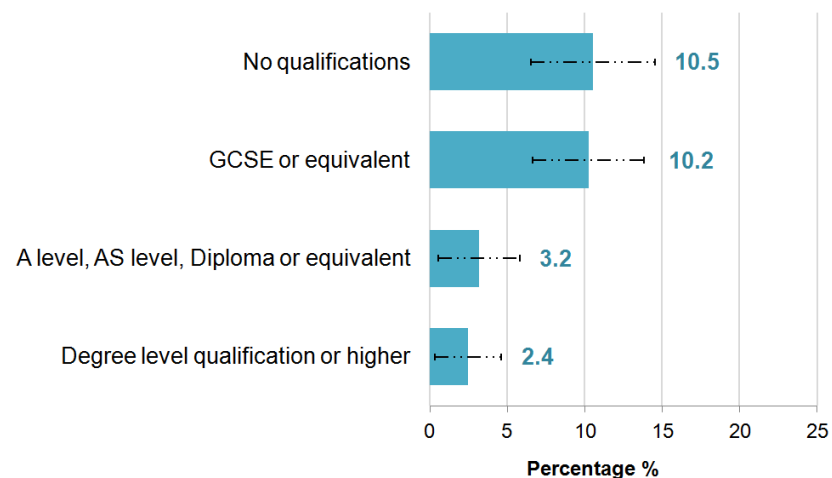
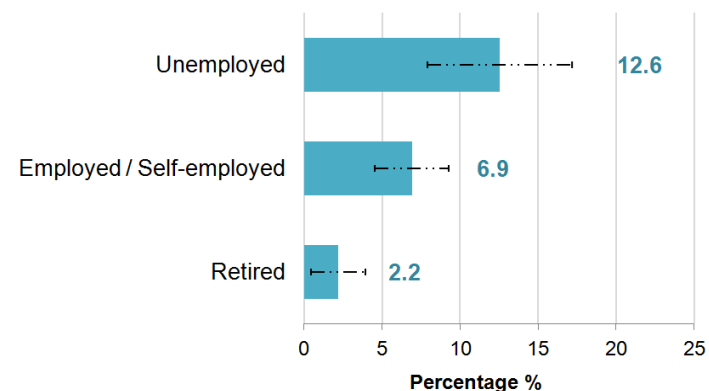


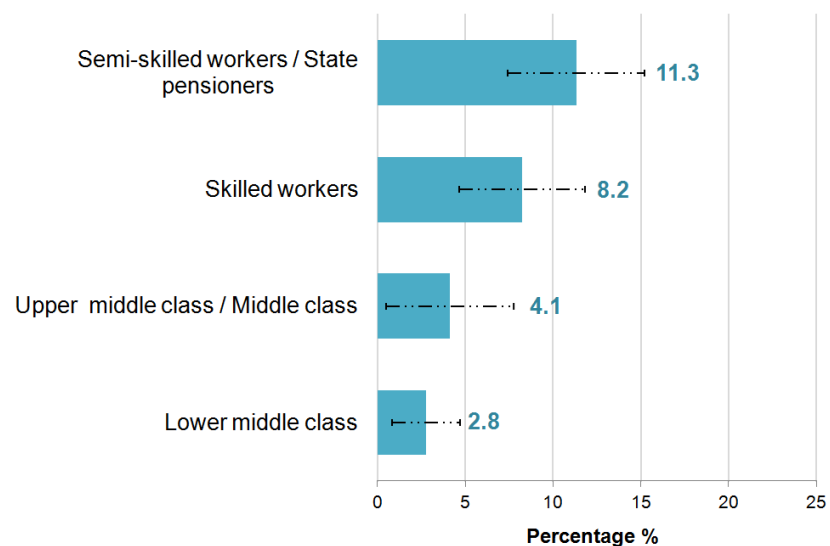
Figure 4.10: Proportion of moderate risk / problem gamblers by employment status (n=64)



The highest level of 'moderate risk/problem gamblers' was in the 'semi-skilled workers/state pensioners' group (11.3%). The lowest levels were in 'lower middle class' (2.8%) (Figure 4.11).

The difference between these two groups was statistically significant.

Figure 4.11: Proportion of moderate risk / problem gamblers by socio-economic status (n=64, refusals not shown in graph)



5. Attitudes to gambling

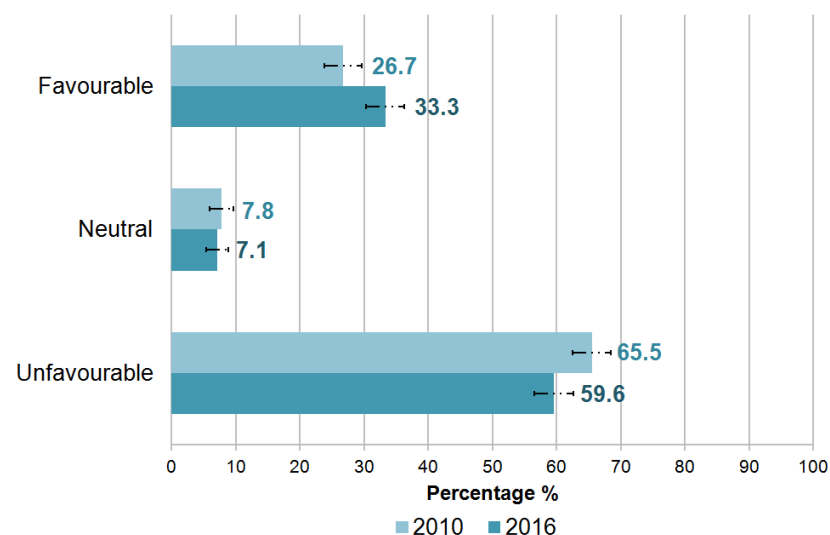
Respondents were asked about their level of agreement with eight attitudinal statements about gambling. The statements were designed to measure their attitudes towards gambling in general as opposed to the individual respondent's attitude towards their own behaviour. No single type of gambling was specified; instead the focus was on gambling in general.

Overall attitude scale

A scale was used in the 2010 survey to measure overall attitudes to gambling. The scale involves scoring the eight individual attitudinal statements with the total score of all eight being used to give an overall attitude score of favourable, neutral or unfavourable towards gambling.

In the 2016 survey, the majority (59.6%) of respondents' attitudes to gambling are unfavourable. However, there has been an increase in favourable attitudes, with a third (33.3%) holding this attitude compared to just over a quarter (26.7%) in 2010 (Figure 5.1) and this difference is statistically significant.

Figure 5.1: Comparison of overall attitudes to gambling in 2010 and 2016



Attitude scale by gender and age

Overall both males' and females' attitudes to gambling were unfavourable. However, male respondents' attitudes are much more favourable compared to female respondents' attitudes (41.4% favourable in males compared with 25.6% favourable in females) (Figure 5.2). This difference in both unfavourable and favourable attitudes between genders is statistically significant.

As age increases attitudes towards gambling generally become more unfavourable, with the most unfavourable attitudes to gambling seen in the 65+ age group (Figure 5.3). This higher percentage of unfavourable attitudes in the 65+ age group was statistically significant when compared to all other age groups.

Favourable attitudes in the 65+ group were also statistically significantly lower compared with all other age groups. No other statistically significant difference between age groups was observed.

Figure 5.2: Overall attitudes to gambling by gender

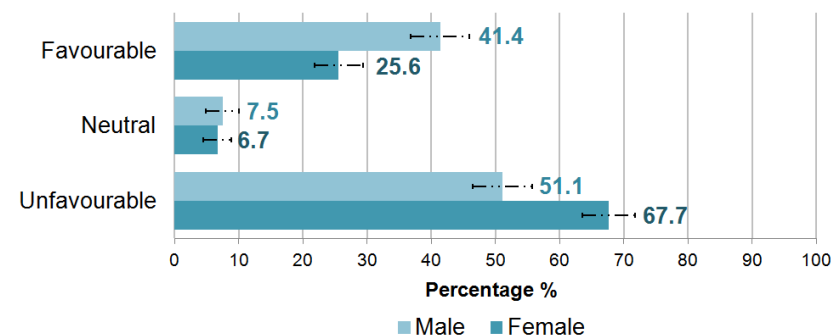
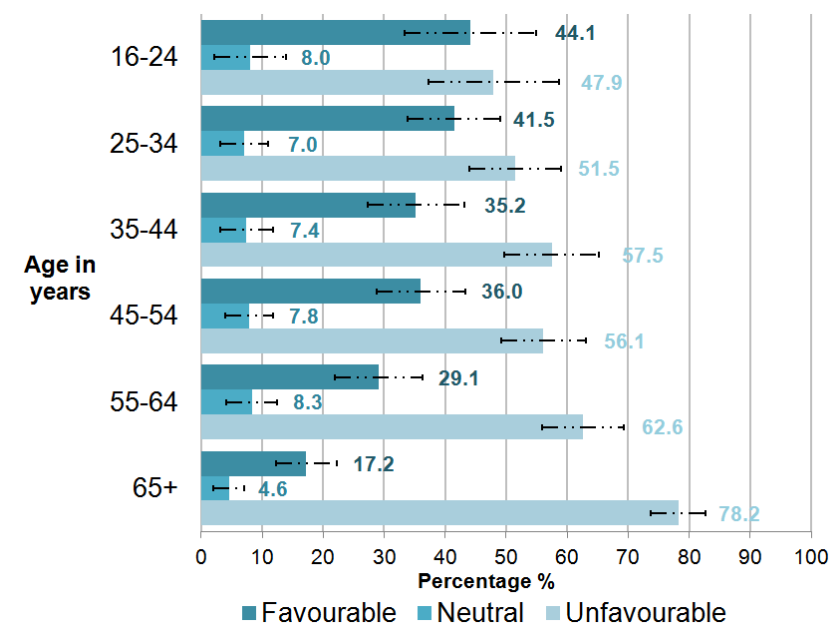


Figure 5.3: Overall attitudes to gambling by age groups



Attitude scale by number of gambling types

The majority of those respondents (75.2%) who did not participate in any type of gambling in the past 12 months had an unfavourable attitude to gambling (Table 5.1). This higher percentage of unfavourable attitudes was statistically significant. Favourable attitudes in those who had not gambled in the last 12 months were also statistically significantly lower compared with all other groups.

As the number of different types of gambling increased, respondents became more favourable in their attitude to gambling. The majority of those who participated in three or more gambling types had a favourable attitude to gambling.

Interestingly, even amongst those respondents who themselves participated in four or more types of gambling, over a quarter (26.7%), still had an unfavourable attitude to gambling in general.

Table 5.1: Overall attitude to gambling by participation in different gambling types

	Attitude Classification (%)		
	Favourable	Neutral	Unfavourable
Number of gambling types in the past 12 months			
0	16.7	8.0	75.2
1	31.4	6.3	62.3
2	40.0	7.5	52.5
3	56.0	6.0	38.0
4+	67.3	6.0	26.7

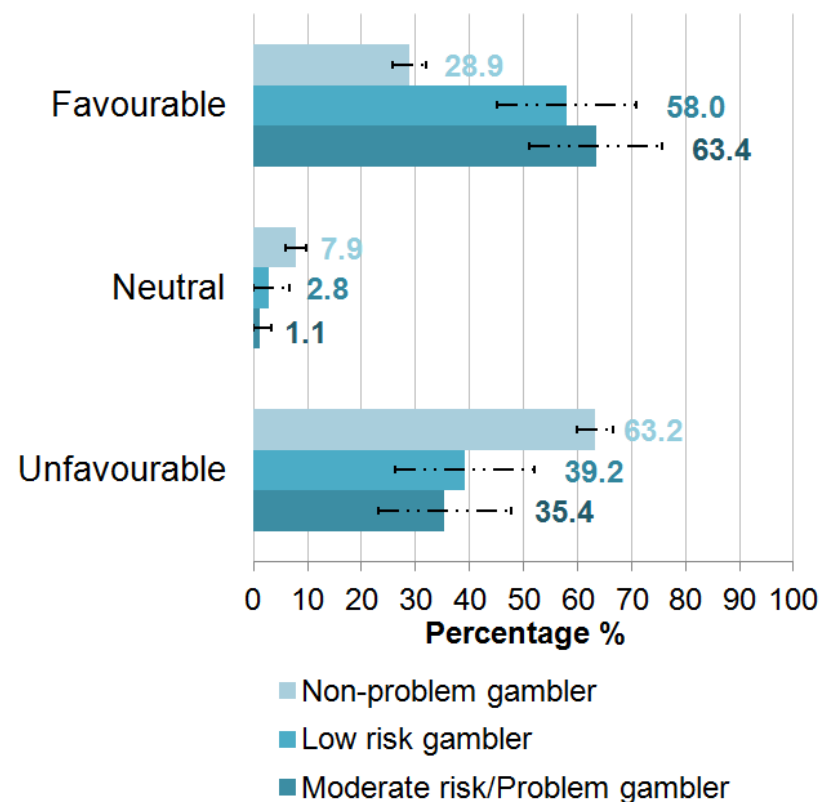
Attitude scale by PGSI score

The majority of 'non-problem gamblers' (63.2%) had an unfavourable attitude to gambling (Figure 5.4). This higher percentage was statistically significant when compared with the other PGSI groups. Favourable attitudes in those who were 'non-problem gamblers' (28.9%) were also statistically significantly lower compared with all other groups.

The majority of 'low risk gamblers' (58.0%) and moderate risk/problem gamblers (63.4%) had a favourable attitude towards gambling. Interestingly, even amongst those respondents who were considered to be moderate risk/problem gamblers over a third (35.4%) had an unfavourable attitude to gambling in general.

Figure 5.4: Overall attitudes to gambling by PGSI score

(n=1003)



Individual attitude statements

Responses to the individual attitudinal statements in 2016 demonstrated that respondents were generally negative towards various aspects of gambling, with five of the eight statements producing a negative response. In spite of the overall negative attitude to gambling, respondents did not appear to support interventions to prevent people from gambling completely as they strongly agreed with the statement ‘people should have the right to gamble whenever they want’ and disagreed with the statement ‘it would be better if gambling was banned altogether’.

The results for the individual attitudinal statements are broadly similar to those presented in the 2010 Northern Ireland Gambling Prevalence Survey, with the overall attitude to each statement remaining the same.

Table 5.2: Percentage agreement with each attitudinal statement

	Overall attitude to gambling	Agree/ Strongly agree	Neither agree or disagree	Disagree/ Strongly disagree	Refused
People should have the right to gamble whenever they want	Positive	76.6	11.7	11.7	0.1
It would be better if gambling was banned altogether	Positive	21.5	24.4	53.8	0.4
Most people who gamble do so sensibly	Neutral	38.4	24.9	36.6	0.1
Gambling livens up life	Negative	32.3	22.5	45.2	0.0
Gambling should be discouraged	Negative	47.8	29.0	23.2	0.0
On balance, gambling is good for society	Negative	15.6	28.9	55.4	0.1
There are too many opportunities for gambling nowadays	Negative	70.1	19.5	10.2	0.2
Gambling is dangerous for family life	Negative	74.9	17.4	7.8	0.0

6. Method of gambling

Those who had taken part in the various gambling types were asked to identify the method of their participation for each type. They were able to choose more than one option for each gambling type e.g. in person, online etc.

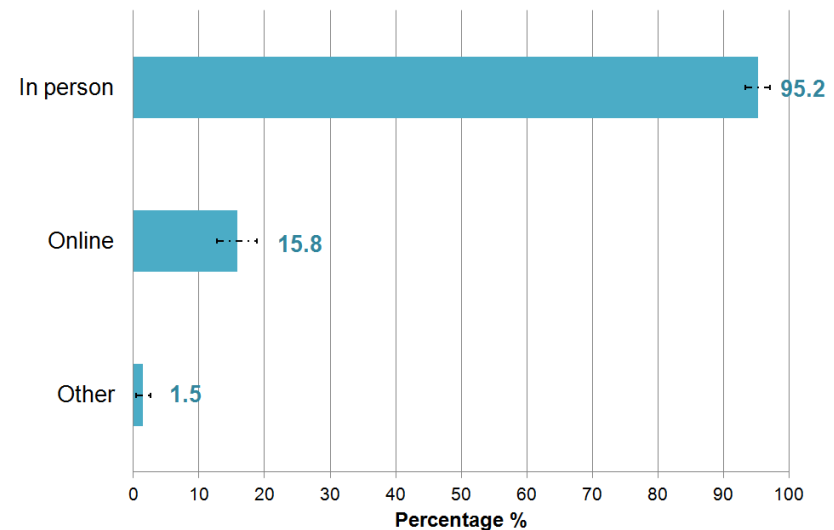
Based on this survey, the most popular method of gambling was 'in person' (95.2%). 'Online' gambling accounted for 15.8% of gambling participation. The 'other' (1.5%) category was made up of by 'telephone', 'via post' and by 'direct debit' (Figure 6.1).

For those who **had gambled** in the last year, the percentage of respondents using an online method (15.8%) had more than doubled since 2010 (6.7%) and this is a statistically significant difference. This will in part reflect an increase in online activity in general.

Of **all respondents** of the survey, 10.6% had gambled online in the last year, this compares with 5.4% in 2010.

Figure 6.1: Method of gambling (gambling participants)

(n = 662)



Online gambling by gender and age

The proportion of respondents who gambled 'in person' is broadly the same for males (94.7%) and females (95.8%). However male respondents (20.8%) were almost twice as likely to gamble 'online' as female respondents (10.7%). This difference was statistically significant (Figure 6.2).

Online gambling appears to generally decrease with age (Figure 6.3). The lowest percentage of online gamblers was the 65+ age group (3.0%). This group was the only one that was statistically significant when compared to all other age groups. Again, this will in part reflect the demographics of those who engage in online activity in general.

Figure 6.2: Online gambling by gender (gambling participants)

(n = 662)

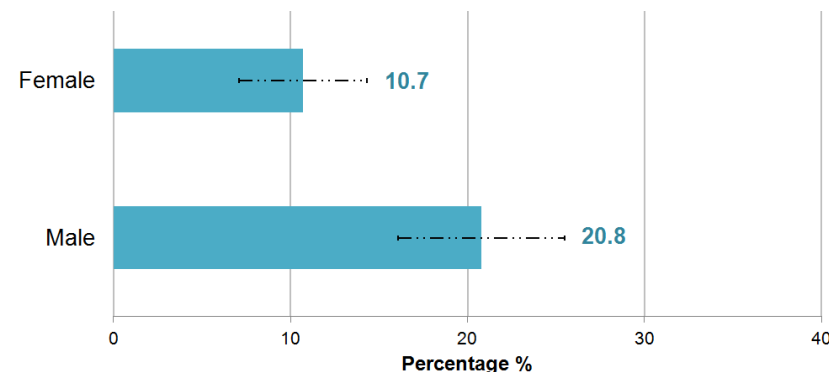
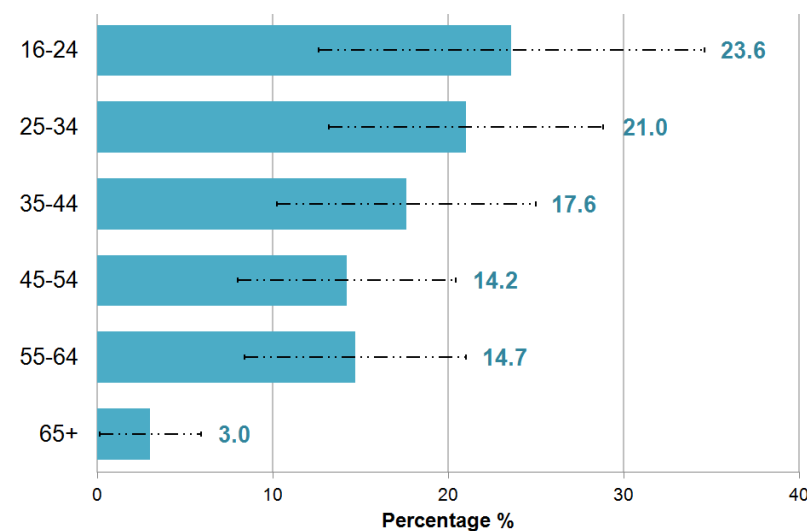


Figure 6.3: Online Gambling by age groups (gambling participants) (n = 662)



Of the top four most popular gambling types, 'betting on an event or sport' has the highest online engagement with nearly a quarter (24.0%) of participants betting online in the last 12 months (Table 6.1).

Of the less popular types, 'football pools' (26.6%), 'tables games' (23.7%) and 'bingo cards or tickets' (21.9%) had the largest proportion of participants using 'online' methods of participation.

Table 6.1: Gambling types by method

	Gambling method (%)			Overall % of those surveyed
	In person	Online	Other	
Gambling Type				
Tickets for National Lottery draws	94.6	8.0	0.0	46.8
Scratchcards or instant win games	99.7	0.3	0.0	23.7
Betting on event or sport	81.8	24.0	2.6	22.8
Other lottery, raffle or ballot	98.1	0.9	2.1	20.6
Fruit/slot machines	97.9	4.6	0.0	6.6
Bingo cards or tickets	78.1	21.9	0.0	4.6
Football pools	83.0	26.6	0.0	2.7
Private betting	100.0	0.0	0.0	2.4
Tables games	76.3	23.7	0.0	1.9
Virtual gaming machines in bookmakers*	100.0	0.0	0.0	1.6

* can only participate in person

7. Amount spent on gambling

When asking people to detail their spending on gambling there are several ways that the term 'spend' could be interpreted:

- 'stake' (the amount bet on an individual event), outlay (total spent in a session);
- turnover (total spent including re-invested winnings) and;
- net expenditure (total gambled minus any winnings)

For the purposes of this survey, spend was described to respondents as **'the total amount of money risked in the past 7 days, i.e. this does not take into consideration any earnings or losses from the bet'**.

Spending bands were created and, for each gambling type, respondents were asked to indicate which band their spend fell into for the previous 7 days. The estimated average weekly spend was calculated for each type by substituting the midpoint of each band as a numeric value and using this value to calculate the overall money spent for each type.

It is important to note that since estimated spend was calculated from banded rather than exact numeric data, they should not be viewed as exact figures, but rather a tool for comparing different groups. Moreover, the maximum value in each case was simply taken as the highest response category (e.g. £200.00) and any outlying high values could not be taken into account. Full details on this methodology are contained in the Technical Notes published alongside this report.

Estimated average spend in the last 7 days

Nearly half (46.1%) of all respondents (Figure 7.1) had not gambled in the last 7 days. Another third had spent either less than £5 (22.4%) or between £5 and £10 (11.2%).

Only a small proportion had spent over £50 (3.0%).

When we look only at those who had gambled in the last year, one in five (19.8%) had not gambled in the previous 7 days (Figure 7.2). Half of those who had gambled in the last 7 days had spent under £10.

Fewer than one in 20 gamblers (4.5%) had spent more than £50 in the last 7 days.

Figure 7.1: Estimated spend in last 7 days (all respondents)

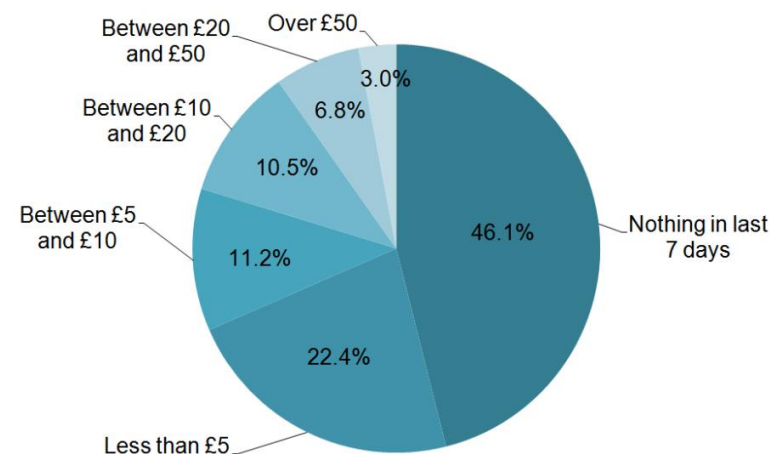
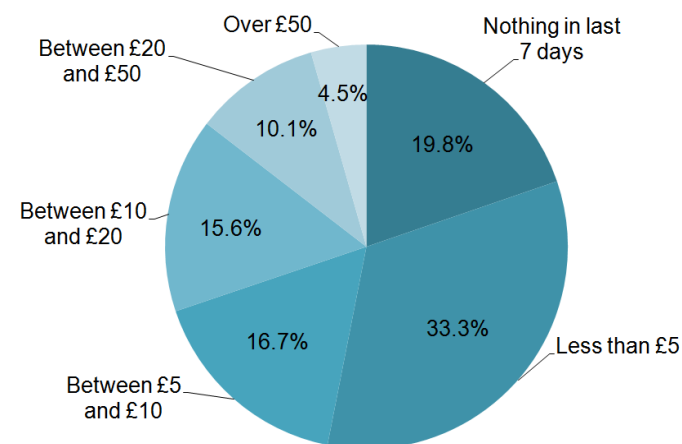


Figure 7.2: Estimated spend in last 7 days (gamblers only)
(n=662)

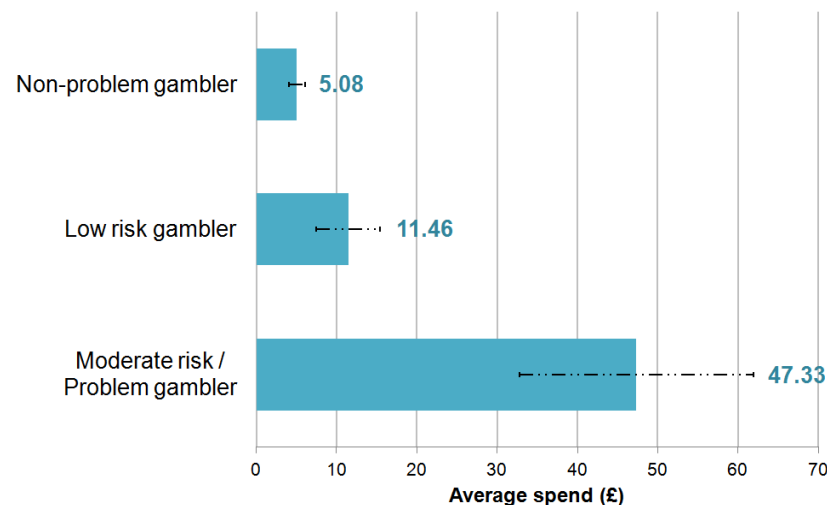


Estimated average weekly spend by PGSI category

The estimated average weekly spend of 'non-problem gamblers' is £5.08, and this increases to £11.46 for 'low risk gamblers' and increases again to £47.33 for moderate risk/problem gamblers (Figure 7.3).

The differences between the three groups are statistically significant.

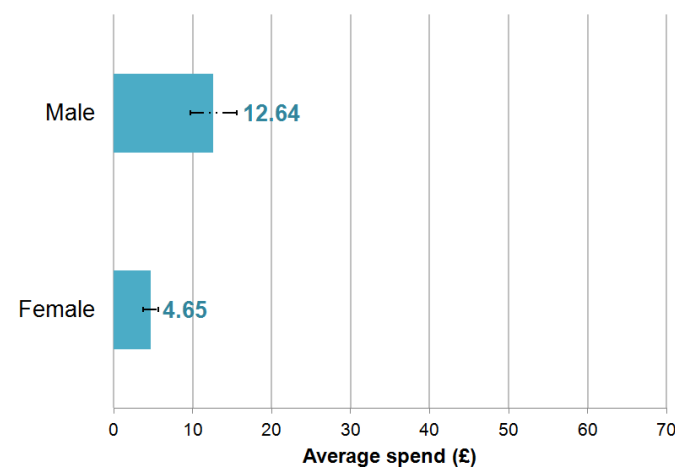
Figure 7.3: Estimated average weekly spend by PGSI category
(n=1003)



Estimated average weekly spend by gender

Male respondents spent over twice the estimated average weekly spend of females with males spending £12.64 and females spending £4.65 (Figure 7.4). These differences between males and females are statistically significant.

Figure 7.4: Estimated average spend by gender



8. Attitudes towards Sunday gambling and gambling advertisements

Current legislation in relation to gambling and betting in Northern Ireland separates it from the rest of the United Kingdom and from the Republic of Ireland in that Sunday opening is prohibited. Gambling opportunities are still available, such as crossing the border or playing online. Respondents were asked their opinions on Sunday opening and also how frequently they bet on a Sunday.

With a growth in advertising by gambling companies, the survey also asked for respondents' attitudes towards various aspects of gambling advertisements. Where respondents had seen or heard gambling advertisements in the past month was also determined.

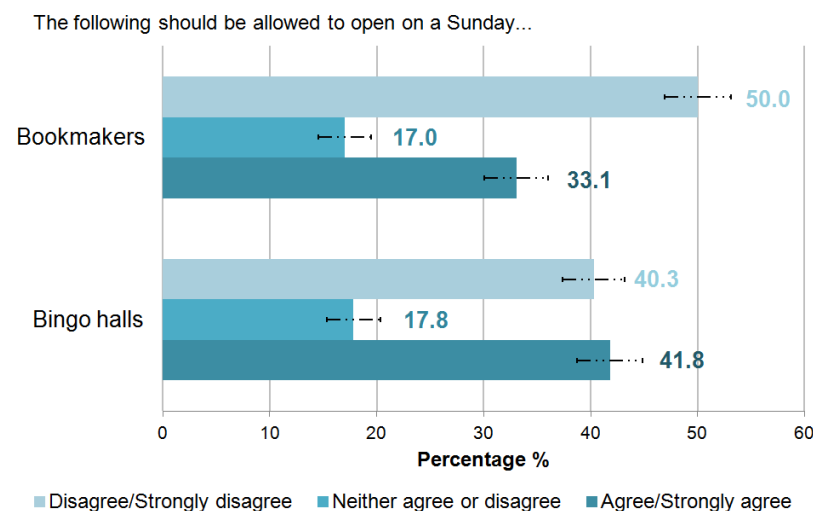
Attitudes to Sunday opening

Respondents were asked whether bookmakers and bingo halls should be allowed to open on Sundays.

Half of respondents (50.0%) disagreed or strongly disagreed that bookmakers should open on a Sunday. There was a statistically significant difference between all three opinions (Figure 8.1).

However, when looking at bingo halls, there is no statistical significance between agreeing or disagreeing that they should open on a Sunday (40.3% disagreed or strongly disagreed and 41.8% agreed or strongly agreed).

Figure 8.1: Attitudes to Sunday opening (n = 1003)



Attitudes to Sunday gambling by gender

There was a difference between males' and females' attitudes to Sunday opening.

Female respondents were more likely than males to 'disagree' or 'strongly disagree' that bookmakers or bingo halls should be open on a Sunday (Figures 8.2 and 8.3).

Over half of males (50.3%) agreed or strongly agreed that bingo halls should be open on a Sunday.

Figure 8.2: Attitudes to bookmakers opening on Sunday by gender (n = 1003)

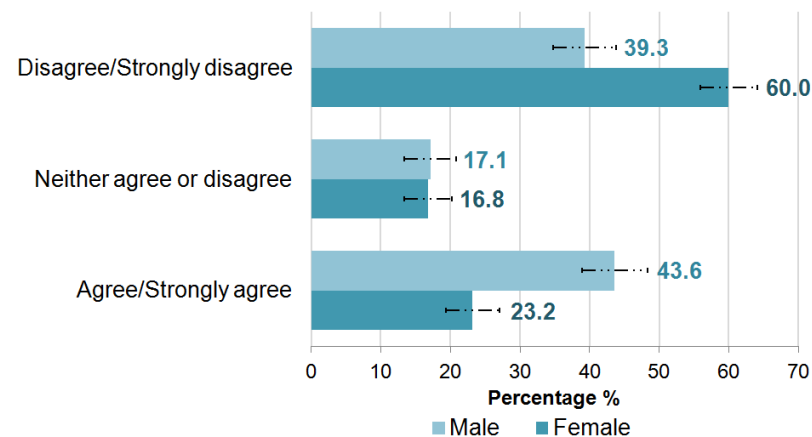
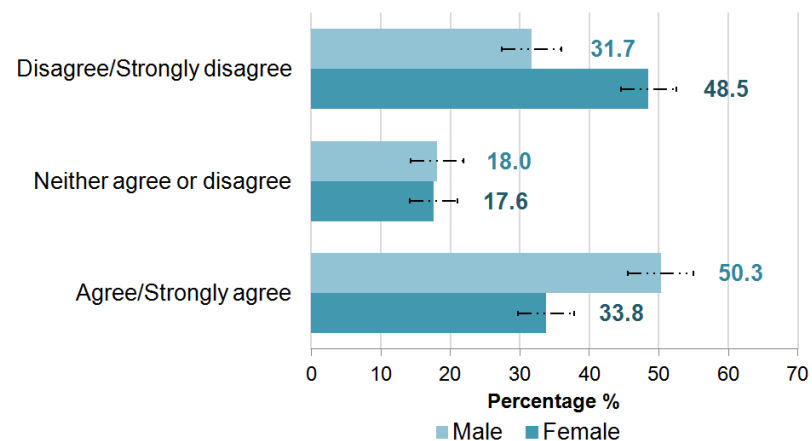


Figure 8.3: Attitudes to bingo halls opening on Sunday by gender (n=1003)



Participation in gambling on a Sunday

Respondents were also asked how often they bet on a Sunday. The majority of respondents (88.4%) had never bet on a Sunday. Fewer than one in 50 respondents (1.8%) had bet every Sunday or nearly every Sunday (Figure 8.4).

When non-gamblers are excluded, the majority (82.7%) still did not gamble on a Sunday (Figure 8.5).

Figure 8.4: Sunday betting activity (all respondents)

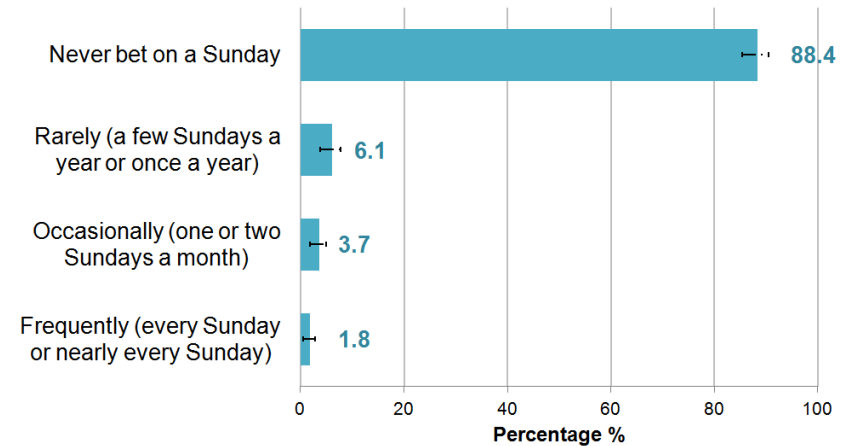
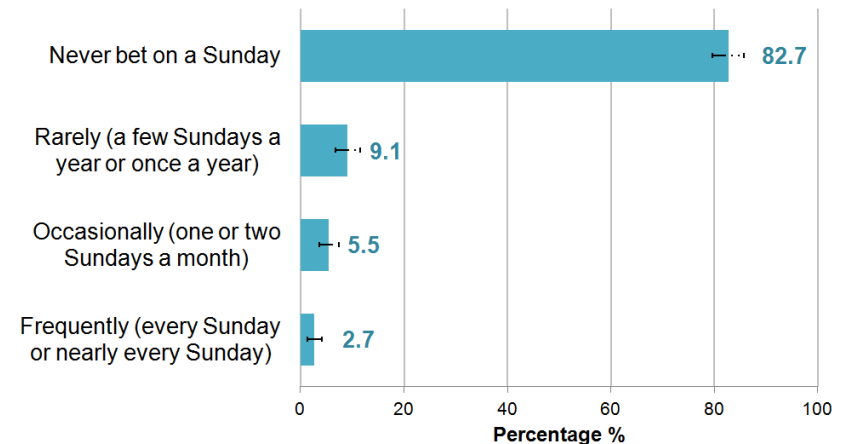


Figure 8.5: Sunday betting activity (gambling participants only) (n=662)



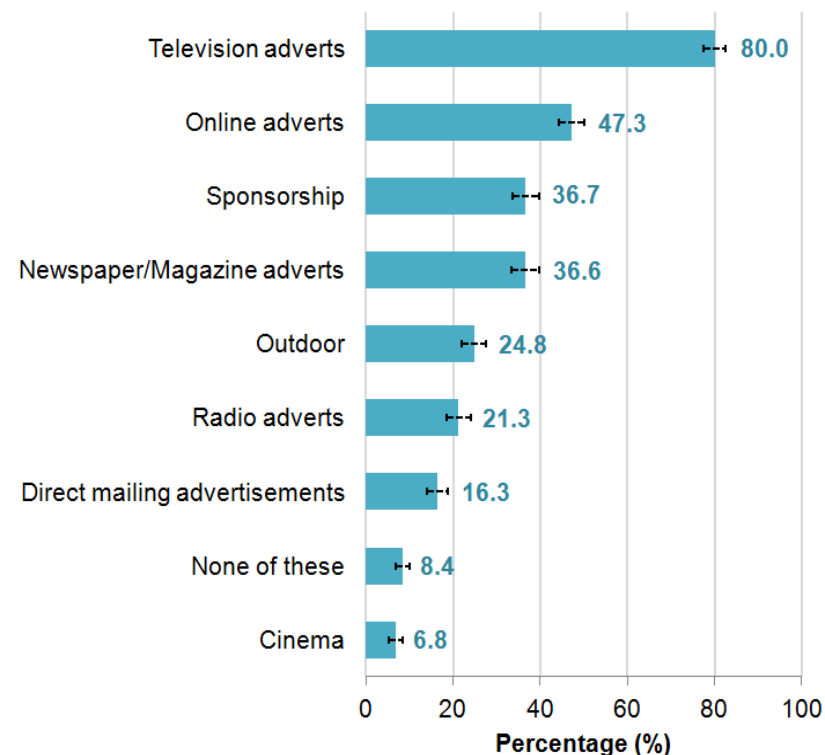
Gambling advertising

The respondents were asked what type of advertisements for gambling they had seen or heard of in the past month. They were able to pick more than one option.

Figure 8.6 shows that 'television adverts' (80.0%) was the most common form of advertisement seen or heard followed by 'online adverts' (47.3%), 'sponsorship' (36.7%) and 'newspaper/magazine adverts' (36.6%).

Almost one tenth of respondents (8.4%) had not seen advertisements for gambling through any of these methods in the past month.

Figure 8.6: Gambling advertisements seen or heard in past month



Respondents were then asked whether they agreed or disagreed with statements relating to gambling advertisements and the results are shown in Figure 8.7.

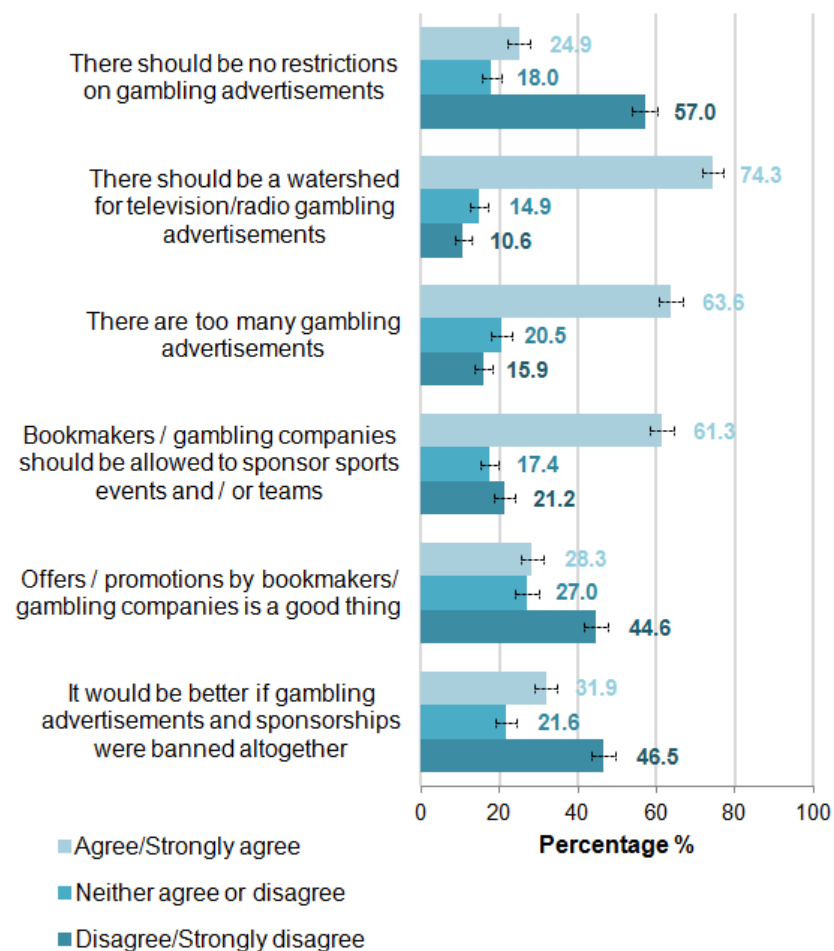
The majority (63.6%) of respondents felt there were ‘too many gambling advertisements’.

There was a majority of respondents in support of some restrictions to gambling advertisements with over half (57.0%) disagreeing that there should be no restrictions and a majority (74.3%) in support of a watershed for gambling advertisements.

Almost half (46.5%) were against banning gambling advertising and sponsorships and a majority (61.3%) felt that ‘bookmakers/gambling companies should be allowed to sponsor sports events or teams’.

The differences between ‘agree/strongly agree’ and ‘disagree/strongly disagree’ were statistically significant for all statements.

Figure 8.7: Attitudes towards gambling advertising (refused not included in graph)



Annex 1: Summary of technical notes

Full technical notes have been released alongside this main publication.

Sample

The Gambling Prevalence study was undertaken by interviewing 1004 adults, aged 16 and over, who reside in Northern Ireland. The interviews were carried out face-to-face in the respondent's home using computer assisted personal interviewing (CAPI).

Sampling design

The population sampling frame was individuals, aged 16 and over, living in households in Northern Ireland. Respondents were selected randomly from the Pointer database, the address database for Northern Ireland created and maintained by Land and Property Services. The Pointer database is the most up-to-date listing of households in Northern Ireland. A stratified random sample approach was used in order to ensure that the study was representative of the adult population living across the whole of Northern Ireland.

Data collection

Surveys were carried out by an external provider, Perceptive Insight. Fieldwork was conducted between June and August 2016.

Weighting

Weighting was carried out using a cell-based weighting technique which adjusts the sample so that the data is made more representative of the population. In this instance the data were weighted to calibrate the achieved household sample so that the distributions for age, gender and area of Northern Ireland matched the 2015 NISRA Mid-Year Population Estimates.

Response rate

ASU provided 2,000 household addresses to Perceptive Insight. A number of these were found to have issues with the address such as the property being vacant or derelict. Therefore the effective sample was 1,883. With 1,004 successful survey responses, the overall response rate was 53.3% (Table A1.1).

Table A1.1: Gambling Survey response rate

	Number of households
Addresses issued in total	2,000
Appointment made, not used as quota reached	4
Vacant/derelict/damaged	51
Address not found	22
Non residential	18
Could not gain access to the property	22
Effective sample	1,883
Household refusal	258
Selected respondent refusal	148
No response from household	284
Exhausted contact after 3 calls	178
Selected respondent away during survey period	11
Successful	1,004
Overall response rate	53.3%

Statistical significance

Any statements in this report regarding differences between groups such as gender, age etc., are statistically significant at the 95% confidence level, unless otherwise stated. This means that we can be 95% confident that the differences between groups are actual differences and have not just arisen by chance.

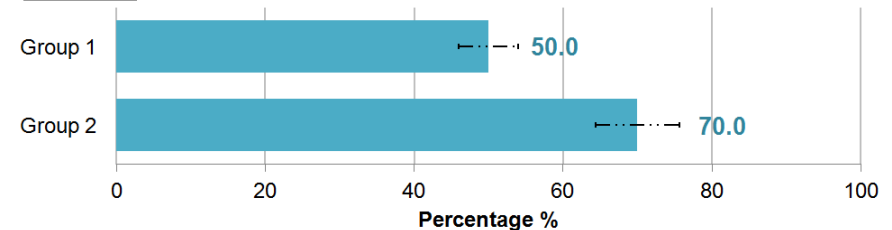
Interpreting error bars

Where appropriate, we have conveyed confidence intervals in tables, graphs and charts. For example, in bar charts we have included “error bars” to show the uncertainty around estimates. If error bars overlap for two groups, we cannot conclude there is a statistically significant difference between the two groups.

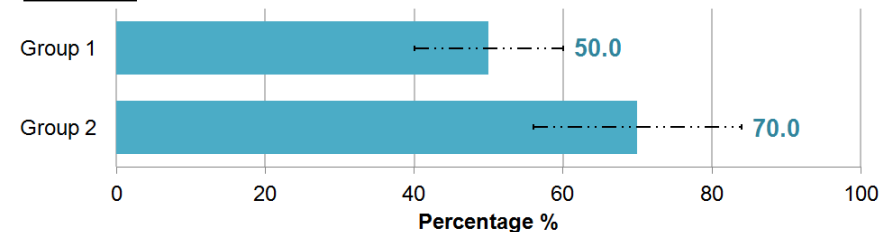
In Example 1, the difference between the two groups is statistically significant at the 95% confidence level. However, in Example 2 we could not make the conclusion. This doesn't mean there isn't a real difference between the two groups, but there simply isn't enough evidence to make a conclusion.

Figure A1.1: Interpreting error bars

Example 1



Example 2



Annex 2: Effect of changes to 2010 methodology

ASU have made changes and improvements to the methodology used for the 2010 survey. These changes to the methodology for the 2016 have now been applied to the 2010 survey to ensure the results for the two studies were fully comparable.

These include changes to:

- weighting technique;
- increased data cleaning;
- changes to how missing values are treated for Problem Gambling Severity Index and;
- changes to how missing values are treated for the attitudes to gambling scale

Further details on these are available in the full Technical Notes document.

These changes have resulted in revisions to the 2010 results.

The impacts on key results are as highlighted in Table A2.1.

Table A2.1: Revised 2010 Gambling Prevalence Survey headline figures

		Percentage %	
		Original Figure	Updated Figure
Gambling Participation	Participated - Yes	75.4	79.8
	Participated - No	24.6	20.2
PGSI	Non-problem gambler	84.4	83.3
	Low-risk gambler	8.1	8.2
	Medium-risk gambler	5.3	5.9
	Problem gambler	2.2	2.6
Attitudes to gambling	Favourable	23.8	26.7
	Neutral	8.8	7.8
	Unfavourable	67.4	65.5

Annex 3: Scoring the attitude scale

A scale was used in the 2010 survey to measure overall attitudes to gambling and it has been repeated for the 2016 survey. Respondents were asked about their level of agreement with eight attitudinal statements about gambling (Table A3.1). Each statement was scored from one to five depending on the response.

A score of 24 shows a neutral attitude towards gambling, a score greater than 24 shows a favourable attitude and a score less than 24 shows an unfavourable attitude (Table A3.2).

Table A3.1: Attitudinal questions

Statements
People should have the right to gamble whenever they want
There are too many opportunities for gambling nowadays
Gambling should be discouraged
Most people who gamble do so sensibly
Gambling is dangerous for family life
On balance gambling is good for society
Gambling livens up life
It would be better if gambling was banned altogether

Table A3.2: Attitudinal Classification Categories

Attitude Category	
Attitude Score	
8-23	Unfavourable attitude
24	Neutral Attitude
25-40	Favourable Attitude

Annex 4: The Problem Gambling Severity Index (PGSI)

The PGSI was developed over a three-year period as a means of measuring the rate of problem, at-risk and non-problem gambling. The instrument itself has been subject to critical evaluation and has been used in a range of other national prevalence surveys globally, including other parts of the UK.

The PGSI consists of nine questions on areas such as betting more than can be afforded, “chasing losses”, financial difficulties caused by gambling and associated health problems.

Each question is assessed on a four-point scale: ‘never’, ‘sometimes’, ‘most of the time’, ‘almost always’. Responses to question are scored from zero to three (Table A4.1).

When scores to each question are summed, a total score ranging from zero to 27 is possible. The total score determines which PGSI group an individual is classified as belonging to (Table A4.2).

Table A4.1: PGSI response scores

	Score
Response	
Never	0
Rarely	1
Most of the time	2
Almost Always	3

Table A4.2: PGSI groups

	Group	Interpretation
Total Score		
0	Non-problem gambler	No identified consequences
1-2	Low risk gambler	Low level of problems with few or no identified negative consequences
3-7	Moderate risk gambler	Moderate level of problems leading to some negative consequences
8 or more	Problem Gambler	Problem gambling with negative consequences and a possible loss of control

Regulation of Gambling in Northern Ireland Consultation Document

The outcome of this consultation will inform the Department for Communities on the regulation of gambling in Northern Ireland. It will help provide an incoming Minister with a broad evidence base on which to determine the way forward.

Scope of Consultation

TOPIC OF THIS CONSULTATION:

This consultation seeks views about the regulation of gambling in Northern Ireland.

SCOPE OF THIS CONSULTATION:

We are keen to hear the views of all parties with an interest in this issue, so that relevant views and evidence can be taken into account in deciding the way forward.

GEOGRAPHICAL SCOPE:

This consultation relates to Northern Ireland only.

IMPACT ASSESSMENTS:

When introducing new measures or a new or amended strategy, policy, procedure, or legislation, the Department is required to consider the impact the proposals may have on Section 75 groups and to have due regard to rural needs. Where regulation is being proposed, a Regulatory Impact Assessment is also required. This consultation is seeking views on the regulation of gambling rather than putting forward any policy proposals and so the Department has not carried out any screening exercises.

Basic Information

BODY/BODIES RESPONSIBLE FOR THE CONSULTATION:

This consultation is being undertaken by Social Policy Unit in the Department for Communities.

DURATION:

This consultation will last for 10 weeks from 16 December 2019 to 21 February 2020.

ENQUIRIES:

For any enquiries about the consultation please email the Department at:

**gamblingconsultation
@communities-ni.gov.uk**

or write to:

Regulation of Gambling in Northern
Ireland Consultation

Department for Communities

Social Policy Unit, Level 8

Causeway Exchange

1–7 Bedford Street

Belfast, BT2 7EG

or Telephone: 028 9082 3140

HOW TO RESPOND:

Online: You can respond online by accessing the consultation documents on the 'Citizen Space' web service. The online version can be accessed at the following link:
www.consultations.nidirect.gov.uk/

EMAIL:

You can also add your comments directly onto this document and email your responses to: **gamblingconsultation@communities-ni.gov.uk** or download and post to:

Regulation of Gambling in Northern
Ireland Consultation

Department for Communities

Social Policy Unit, Level 8

Causeway Exchange

1–7 Bedford Street

Belfast, BT2 7EG

When you reply it would be very useful if you could confirm whether you are replying as an individual or submitting an official response on behalf of an organisation.

If you are replying on behalf of an organisation please include:

- Your name
- Your position (if applicable)
- The name of your organisation
- An address (including postcode)
- An email address

CONSULTATION RESPONSE:

We will consider the responses received and publish an outcome report on the Departmental website.

In line with good practice and sustainable development this document has been published electronically.

ACCESSIBILITY:

A range of alternative formats are available upon request from this Department.

Please email the Department at:

**gamblingconsultation
@communities-ni.gov.uk**

or write to:

Regulation of Gambling in Northern
Ireland Consultation

Department for Communities

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or Telephone 028 9082 3140

How we consult

CONSULTATION PRINCIPLES:

This consultation is being conducted in line with the **Fresh Start Agreement – (Appendix F6 – Eight Steps to Good Practice in Public Consultation-Engagement)**. These eight steps give clear guidance to Northern Ireland departments on conducting consultations.

FEEDBACK ON THE CONSULTATION PROCESS:

We value your feedback on how well we consult. If you have any comments about the consultation process (as opposed to comments about the issues which are the subject of the consultation), including if you feel that the consultation does not adhere to the values expressed in the Eight Steps

to Good Practice in Public Consultation Engagement or that the process could be improved, please address them to:

Regulation of Gambling in Northern
Ireland Consultation

Department for Communities

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Belfast, BT2 7EG

Email: **gamblingconsultation
@communities-ni.gov.uk**

Privacy, Confidentiality and Access to Consultation Responses

For this consultation, we may publish all responses except for those where the respondent indicates that they are an individual acting in a private capacity (e.g. a member of the public). All responses from organisations and individuals responding in a professional capacity may be published. We will remove names, email addresses and telephone numbers from these responses; but apart from this, we will publish them in full. For more information about what we do with personal data please see our consultation privacy notice.

Your response, and all other responses to this consultation, may also be disclosed on request in accordance with the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR); however all disclosures will be in line

with the requirements of the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR) (EU) 2016/679.

If you want the information that you provide to be treated as confidential it would be helpful if you could explain to us why you regard the information you have provided as confidential, so that this may be considered if the Department should receive a request for the information under the FOIA or EIR.

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1. Introduction

- 1.1 A number of evidence sources, including the results of two Northern Ireland gambling prevalence surveys, stakeholder input, an earlier literature review and a previous consultation have informed the development of this consultation paper. Consideration has also been given to the regulatory approaches in Great Britain and the Republic of Ireland.
- 1.2 The Department accepts that the current legislation is outdated and has not kept pace with industry and technological changes; it is also complex and inflexible.
- 1.3 The purpose of this consultation is to seek views on the appropriateness of the current legislation and to identify areas of gambling activity which should be included in any future legislation on gambling in Northern Ireland.
- 1.4 A number of questions have been posed throughout this paper on a range of issues. It will fall to the next administration to make final decisions on gambling reform and promote the necessary legislation.

2. Gambling in Northern Ireland

2.1 The law in Northern Ireland

Northern Ireland law in respect of gambling is contained in 'The Betting, Gaming, Lotteries and Amusements (Northern Ireland) Order 1985' (the 1985 Order). The 1985 Order is broadly modelled on much older law from Great Britain (the Betting, Gaming and Lotteries Act 1963, the Gaming Act 1968 and the Lotteries and Amusements Act 1976).

The 1985 Order regulates betting in bookmaking offices and on tracks, the use, supply and maintenance of gaming machines, gaming in bingo clubs, small scale amusements with prizes, and local lotteries. It sets out the procedures for the licensing of gambling activities and

the offences and penalties for breaches of associated licensing conditions.

The courts and district councils license gambling activities; the Department is responsible for issuing track-betting licences; and responsibility for enforcement of gambling law lies with the Police Service of Northern Ireland (PSNI).

2.2 Structure of the industry

The gambling industry in Northern Ireland is relatively small when compared to Great Britain. Latest available figures show that 2310 persons are employed in all gambling and betting activities in Northern Ireland.

This figure is broken down as follows:

Male Full Time	Male Part Time	Total Male	Female Full Time	Female Part Time	Total Female	Total (Male and Female)
650	383	1033	644	633	1277	2310

A significant number of people are also employed indirectly in the local gambling industry such as gaming machine suppliers, and in ancillary activities.

In the betting sector there are currently approximately 300 licensed bookmaking offices; the majority of these are operated by large chains including Ladbrokes, William Hill, McLeans and Toals. There are 2 horse racing tracks and 2 dog racing tracks licensed for betting.

There are around 40 commercial bingo clubs in Northern Ireland most of which are locally owned. The number of certificates issued for the supply and maintenance of gaming machines is around 40. Gaming machines are operated mainly in amusement arcades and the total number of amusement permits issued for this purpose is around 140. Gaming machines may also be operated (without a separate permit) in bookmaking offices, bingo halls and the bar areas of pubs, hotels and registered clubs.

Around 160 organisations have registered with district councils as societies' lotteries, in which tickets for prizes are sold to the public for good causes.

2.3 Gambling Prevalence Survey

The results of the first Northern Ireland wide gambling prevalence survey of

the adult population (aged 16+) were published in 2010; a second survey was subsequently carried out in 2016. The results of these surveys provide a good indication of the nature of the gambling industry here and its impact on society.

The 2016 survey showed that three out of four adults had taken part in some form of gambling within the past 12 months, with the most popular form of gambling being the National Lottery draw (46.8%). The other most popular gambling activities are local raffles and ballots (20.6%), scratch cards (23.7%) and betting with a bookmaker (22.8%). For those who had gambled in the last year, the percentage of respondents using an online method (15.8%) had more than doubled since 2010 (6.7%).

The survey also used an internationally recognised screening tool to measure the level of problem gambling here. It identified 2.3% of the population as having a gambling problem; over four times higher than that recorded in Great Britain. Problem gambling is discussed in more detail in the next chapter of this consultation.

The 2016 survey is available on the Departmental website at www.communities-ni.gov.uk/publications/2016-northern-ireland-gambling-prevalence-survey.

2.4 How does our law compare with Great Britain and the Republic of Ireland?

Great Britain

The Gambling Act 2005 (The 2005 Act) modernised the law in Great Britain, it strengthened regulation by introducing enhanced controls and stricter enforcement measures, and placed more emphasis on social responsibility. It does not encourage or obstruct lawful gambling nor make implicit judgements about the morality underpinning it.

The 2005 Act established an independent body, the Gambling Commission, to advise Government, control and regulate gambling, enforce the law and promote socially responsible gambling in Great Britain; it is accountable to the Department for Digital, Culture, Media and Sport.

The Gambling Commission is responsible for the granting of operating licences (for individuals or companies providing facilities for commercial gambling, including remote gambling) and personal licences (for people performing key management or operating functions in which they could influence the outcome of gambling). The Gambling Commission is pro-active in terms of assessing the suitability of prospective gambling operators and has extensive powers for this purpose. It may impose

conditions on licences and issue codes of practice on how these conditions can best be achieved. The licensing system which the Gambling Commission oversees is intended to be flexible enough to keep pace with technological developments so that gambling delivered by new, unforeseen methods can be efficiently regulated in the future.

The Gambling Commission is also the main enforcer of gambling law in Great Britain, however the police and licensing authorities also have the power to prosecute. The Gambling Commission has extensive powers to investigate, enter premises, seize goods, prosecute, levy unlimited fines, revoke the licences of gambling operators and their employees who fail to comply with the law, and suspend and void bets.

Republic of Ireland

Gambling in the Republic of Ireland is currently regulated by a number of pieces of legislation including The Gaming and Lotteries Act 1956, the Betting Act 1931 (amended most recently in 2015) and The Totalisator Act 1929. A number of bodies have a role in respect of how it is regulated – Department of Justice and Equality, Department of Finance, Department of Public Expenditure and Reform, Revenue Commissioners, An Garda Síochána, Local Authorities and District Courts.

Work is currently under way to modernise the law in the Republic of Ireland; in March 2019 the Minister of State with special responsibility for gambling regulation, David Stanton TD, announced that the Government had approved the establishment of an Irish gambling regulatory authority.

Establishing the gambling regulatory authority, as an independent statutory body under the auspices of the Department of Justice and Equality, was the key recommendation of the report of the Inter-Departmental Working Group on the Future Licensing and Regulation of Gambling.

If you are replying **on behalf of an organisation** please include: • Your name • Your position (if applicable) • The name of your organisation • An address (including postcode) • An email address

Maximum 350 words

3. The Future of Gambling in Northern Ireland

This chapter asks whether some forms of gambling, which are not currently permitted in Northern Ireland but have become commonplace elsewhere, should now be offered here, and regulated accordingly.

3.1 Casinos

Most countries in the European Union, and many others around the world, provide for commercial casino gaming within their gambling legislation. In Great Britain there are currently approximately 150 casinos, including 15 in Scotland and 4 in Wales. The current legislation in the Republic of Ireland does not provide for casinos, nevertheless approximately 12 of these establishments are in existence, operating as members clubs. The legislation currently being drafted in the Republic of Ireland is intended to bring such establishments within the law.

Well known casino games include roulette, blackjack, baccarat and craps (dice). These games all involve playing or staking against a bank (the casino) or playing a game where the chances are not equally favourable to all the players. Equal chance games, such as poker, can also be played in a separate card room for which a charge may be

made by the casino; gaming machines with high stakes and pay-outs are also usually available.

Current Northern Ireland gambling legislation prohibits high stakes banker games and games of unequal chance in all commercial settings. No provision for casinos was included in the 1985 Order because there was no evidence of any real demand for them in Northern Ireland.

Changing the law to enable casinos to operate in Northern Ireland, was subsequently raised during a consultation exercise in 1997 however there was substantial opposition to such a change and it was not taken forward.

Evidence shows that casinos can bring benefits to regions in terms of jobs, tourist revenue and regeneration; this is particularly so when the casino is developed as part of a wider leisure complex. In recent years, interest has been expressed in developing such a complex in Belfast on a number of occasions, however the inclusion of a casino is seen as a key component of such a development and these proposals have, therefore, not progressed.

Casino type gaming is generally regarded as the hardest form of gambling in terms of dangers to the individual and susceptibility to abuse by criminal elements. Anecdotal evidence suggests that a growing number of premises, which hold amusement permits or bingo licences, in towns across Northern Ireland are now providing casino type gaming. In addition, a number of PSNI operations have been carried out in recent years, including one which saw illegal gaming machines and casino roulette machines seized and which ultimately led to a successful prosecution.

A decision to allow high stakes casino type gaming therefore would have significant implications for the structure of the regulatory framework as it would be necessary for such gaming to be closely supervised by the authorities, as is the case in other jurisdictions.

Should the law be amended so as to permit casinos to operate in Northern Ireland?

Yes

No

3.2 Poker and other gaming in pubs and clubs

In recent years, poker tournaments,

bingo and other equal chance gaming have become a source of entertainment and income for pubs and registered clubs in Great Britain. Such gaming is permitted at these venues subject to strict limits on stakes and prizes and, for some games, charges for participation. These controls are designed to protect both the players and those providing the facilities to ensure that gaming remains ancillary to the main purpose of the pub or club.

The Northern Ireland law on gaming is much more restrictive to the extent that poker or other games cannot be organised commercially in licensed premises and registered clubs here. The Department is, however, aware that in recent years a number of entertainment events have taken place across Northern Ireland, on premises other than bingo clubs, at which bingo is part of a wider entertainment offering, with music, dancing and alcohol also available. While some of these events appear to be in aid of charitable purposes and therefore may be permitted under current legislation, it is also clear that some are operating for private gain and would therefore appear to be unlawful.

Is the current legislation, which prevents premises licensed to sell alcohol and registered clubs from offering poker, bingo and other equal chance gaming, still appropriate?

Yes

No

If No, how should the legislation be amended?

3.3 Remote (online) gambling

Remote gambling, also known as online gambling, refers to gambling services that rely on a telephone connection e.g. internet, interactive television and mobile phones; it has become increasingly popular in Northern Ireland as with elsewhere in the world. Among those who had gambled in the last year, the percentage of respondents using an online method had more than doubled in the 2016 Northern Ireland Gambling Prevalence Survey (15.8%) when compared with the figure in the 2010 survey (6.7%)

The 1985 Order predates the development of the internet and therefore contains no provisions relating to remote gambling activities, nor does it prevent a Northern Ireland resident from taking part in internet gambling. This consultation will consider two particular issues in respect of remote gambling, namely, the regulation of remote gambling and consumer protection.

3.3.1 Regulation of remote gambling

The 2005 Act regulated remote gambling in Great Britain for the first time and was subsequently amended by the Gambling (Licensing and Advertising) Act 2014. The legislation requires remote gambling operators to obtain the appropriate licence from the Gambling Commission in order to advertise to, or

carry out transactions with, consumers in Great Britain - this applies to all remote gambling operators, whether they are based in Great Britain or outside it. It is a condition of the licence that operators adhere to social responsibility measures including age verification and self-exclusion.

To deal with unlicensed remote gambling operators, the Gambling Commission has an arrangement with major payment processors, such as Visa, MasterCard and PayPal, who have voluntarily agreed to block transactions between United Kingdom consumers and online gambling sites not licensed by the Commission. Northern Ireland consumers are therefore protected under this arrangement.

The 2014 legislation also made it an offence to advertise remote gambling in Northern Ireland unless the operator holds a remote operating licence from the Gambling Commission. Consumers here are therefore protected by the Licence Conditions and Codes of Practice (LCCP) and social responsibility measures in the same way as consumers in Great Britain.

Remote gambling operators have tended to base themselves overseas for tax reasons and it is therefore considered unlikely that an operator would seek to establish their operations in Northern Ireland.

Is it necessary to introduce additional, Northern Ireland specific, licensing and regulatory measures with respect to remote gambling operators?

Yes	No
If Yes, how should the legislation be amended?	

3.3.2 Consumer Protection

The Gambling Commission does not resolve consumer complaints, for example, it does not assist individuals in getting money back from a bet placed or from playing poker or casino games online. The Commission's role is as a licensing and regulatory authority. When brought to its attention, it may investigate issues such as non-compliance with licence conditions and, where necessary, take regulatory action.

However, a significant degree of protection for online consumers is provided by the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), which require operators to

meet certain standards when handling complaints, and to offer dispute resolution by an independent third party or ADR (Alternative Dispute Resolution) provider – one such ADR body is **IBAS** (Independent Betting Adjudication Service). Consumers in Northern Ireland can avail of these complaints procedures in the same way as any other consumer.

Are the current consumer protection measures available to Northern Ireland consumers when gambling online sufficient?

Yes

No

If No, what additional measures could be introduced?

3.4 Opening hours of bookmaking offices and commercial bingo clubs

The 1985 Order prohibits the opening of bookmaking offices and commercial bingo clubs on Sundays, Christmas Day and Good Friday. Sunday opening is already available in bookmaking offices and bingo clubs in the rest of the United Kingdom and in the Republic of Ireland.

Many opportunities to gamble in Northern Ireland on Sunday already exist, for example betting at a race track, at gaming machines in amusement arcades, pubs, hotels and clubs, on the National Lottery and via remote means.

In recognition of the fact that the issue of working on a Sunday evokes strong opinions, the current legislation includes protections for those who do not wish to work on a Sunday in the on-course sector of the bookmaking industry.

In recent years there has been a significant increase in the number of Sunday events that attract a betting audience, particularly sporting activities. Local bookmakers and bingo club owners believe the current law

has not created a level playing field and are pressing for it to be amended. Amending the legislation would provide a legitimate route for those currently said to be betting through illegal bookmakers in pubs and clubs particularly on Sundays, ensuring that gambling activities are undertaken in a controlled and regulated environment.

Is the current legislation in respect of the opening of bookmaking offices still appropriate?

Yes

No

If No, please choose one of the following:

I think the opening hours should be restricted further

How should they be restricted?

Please explain on page 21

I think bookmaking offices should also be permitted to open:

on Sundays?

Yes

No

on Good Friday?

Yes

No

on Christmas day?

Yes

No

Is the current legislation in respect of the opening of commercial bingo clubs still appropriate?

Yes

No

If No, please choose one of the below

I think the opening hours should be restricted further

How should they be restricted?

Please explain on page 22

I think commercial bingo clubs should also be permitted to open:

on Sundays?

Yes

No

on Good Friday?

Yes

No

on Christmas day?

Yes

No

3.5 Demand test

Before a court grants a new premises licence to a bookmaking office or bingo club it must be satisfied that provision in a particular area is inadequate to meet current local demand – the “demand test”. This was also a feature of the law in Great Britain prior to the 2005 Act. There is an argument for retaining the test so as to avoid the proliferation of gambling premises in a particular area, taking full account of all relevant local issues in this regard. On the other hand it could be argued that market forces and a robust licensing framework should keep premises to manageable numbers – it is not the purpose of regulation to stifle competition.

Is the current ‘demand test’ for new bookmaking offices still necessary?

Yes No

Is the current ‘demand test’ for new bingo clubs still necessary?

Yes No

3.6 Residency and incorporation requirements

The 1985 Order requires an applicant for a bookmaker’s licence, a bingo club licence, a gaming machine certificate or permit, or a lottery certificate to be ordinarily resident in Northern Ireland for at least 12 months prior to the date of application. Companies must be

incorporated under Northern Ireland companies law and directors of such companies must, in addition, fulfil the same residency conditions. A company intending to apply for an amusement or pleasure permit, must also be incorporated under Northern Ireland companies law but directors are not required to fulfil residency requirements.

Are the current conditions in respect of residency and incorporation for those wishing to enter the Northern Ireland gambling market still appropriate?

Yes

No

If No, how should the current conditions be amended?

3.7 Age requirements for gambling operators

21 is the lower age limit under the 1985 Order for holders of a bookmaker's licence, bingo club licence, gaming machine certificate or permit, or lottery certificate. In the case of companies, the 21 age limit also applies to directors. There are no age restrictions for amusement or pleasure permits. Under the law in Great Britain, licences are subject to a lower age limit of 18.

Are the current age restrictions in respect of the grant of a bookmaker's licence, bingo club licence, gaming machine certificate or permit or lottery certificate still appropriate?

Yes

No

If No, how should the current conditions be amended?

3.8 Advertising

There are various restrictions on the advertising of gambling in the 1985 Order. As the law here is largely premises based the restrictions tend to reflect this, for example, 'hard copy' advertising of bookmaking offices is allowed but the advertising of offices in other forms such as broadcast advertising is prohibited. Also, the advertising of premises in which gaming takes place is prohibited other than for specified exemptions e.g. bingo and gaming machines in arcades.

The 2005 Act has given broadcasters and publishers based in Great Britain considerably greater freedom to advertise gambling. The new rules in Great Britain mean that it is possible to

advertise gaming, betting and lotteries through a variety of media including television and radio; advertising of gambling through online means is also widespread, for example, through social media and email.

All media advertising is regulated by the Advertising Standards Authority (ASA) based on codes written by the Committee of Advertising Practice (CAP); these codes apply across the United Kingdom.

Is the current law in respect of advertising of gambling in Northern Ireland still appropriate?

Yes

No

If No, please choose one of the following

**Further restrictions should
be introduced**

What additional restrictions should
be introduced? **Please explain**

**The current restrictions should
be eased**

How should the current restrictions
be eased? **Please explain**

**There should be full alignment with the
law in Great Britain in respect of the
advertising of gambling**

3.9 Prize competitions

Northern Ireland law does not permit any commercially organised prize competition which involves forecasting the result of an event, or in which success does not depend to a substantial degree on the exercise of skill.

Commonly used as a sales promotion or marketing device, a commercial prize competition or draw which does not meet the “skill” requirement may still be lawful as long as there is a free method of entry.

Promotional prize draws whereby a person must buy a particular product or service e.g. a chocolate bar or a magazine, or have a particular bank account (such as for the Halifax Savers Prize Draw), in order to have a chance to win a prize are not considered free draws under the 1985 Order and are therefore unlawful in Northern Ireland.

In Great Britain, the purchase of a particular product or service as a requirement for entry to a prize draw is not regarded as payment to enter the competition so long as the price of the goods or services does not contain any additional cost which reflects the opportunity to participate in the competition.

In order to comply with Northern Ireland law, companies promoting UK-wide prize competitions associated with the purchase of a product/service must either exclude Northern Ireland from their competitions, offer a free entry route to Northern Ireland participants or offer a free entry route throughout the United Kingdom.

Should the current law in respect of promotional prize competitions and draws in Northern Ireland be amended to reflect that which exists in Great Britain?

Yes

No

3.10 Protection of children

There are a range of measures currently in place in Northern Ireland to protect children and young people from gambling. Under-18s are prohibited from engaging in betting transactions and are not permitted to enter a licensed bookmaking office. Under-18s may not participate in bingo in a licensed bingo club but there are no restrictions on under-18s being in such a club. No ticket or chance to win a prize in a society's lottery may be bought by or sold to anyone under the age of 16. There are, however, no restrictions in the 1985 Order specifically on the use of gaming machines by under-18s.

While there are no restrictions on the use of gaming machines, there are barriers to access to the higher value prize machines by under-18s. For example, under-18s

are not permitted in areas of amusement arcades with £25 prize machines.

In terms of premises licensed to sell alcohol, under-18s are only permitted in the bar where a children's certificate is in place and where they are accompanied by an adult.

In Great Britain, the 2005 Act established a number of offences concerning underage gambling; this included inviting, causing or permitting a child or young person to gamble on any gaming machine other than the lowest Category D machines.

Do you believe that other specific measures should be introduced to help protect children?

Yes

No

If Yes, what measures should be introduced?

Do you believe that specific offences should be created in relation to causing or permitting an under-18 to gamble using certain gaming machines?

Yes

No

3.11 Problem gambling – research, education and treatment

As previously highlighted, the 2016 Northern Ireland Gambling Prevalence Survey found that over 2% of people in Northern Ireland aged 16 and over has a gambling problem. ‘Problem gambling’ is gambling to a degree that compromises, disrupts or damages family, personal or recreational pursuits.

Health issues arising from problem gambling are not the responsibility of the Department for Communities. There are no gambling specific services commissioned by the Health and Social Care Board. However, someone with a mental health issue, such as, anxiety or depression arising from the consequences of gambling would receive appropriate help for that condition in the same way it is available to anyone else in Northern Ireland, based on clinical assessment, clinical need and in line with the Regional Mental Health Care Pathway. Patients requiring specific gambling support are directed towards community services, such as Gamblers Anonymous, Addiction NI, GamCare and Dunlewey Addiction Service.

The 24/7 Lifeline service is also available for anyone in crisis or despair.

There are no provisions within the 1985 Order which require the gambling industry in Northern Ireland to make any contribution to funding support services for problem gambling, however, the Department is aware that some gambling providers do contribute funding to local support organisations on a voluntary basis.

In Great Britain, under the Gambling Commission’s Licence Conditions and Codes of Practice (LCCP), all licensed gambling businesses make a contribution towards research, education and treatment of problem gamblers. Fundraising targets for the gambling industry are agreed by the Commission with the government and with the **Advisory Board for Safer Gambling**.

While the Commission highlights the work of **GambleAware**, they do not insist that they are the beneficiary of contributions nor do they seek to tell licensees how much their contribution should be.

The 2005 Act also contains provisions which would allow the government to impose a statutory levy upon industry; the levy would be paid to the Gambling

Commission and is specifically intended for alleviating problem gambling. Following criticism in respect of the level of contributions which the industry make, the Advisory Board for Safer Gambling has called for the introduction of such a levy in Great Britain.

Do you believe that the Northern Ireland gambling industry should help fund research, education and treatment of problem gamblers?

Yes

No

Do you believe that a power should be taken to impose a statutory levy on the Northern Ireland gambling industry?

Yes

No

4. Sector Specific Issues

The main activities permitted under the 1985 Order relate to the following sectors; betting, commercial bingo clubs, gaming machines and lotteries (other than the National Lottery). This chapter looks at issues that are particular to each sector and seeks views in respect of possible amendments to the legislation in the future.

In considering the following issues, the reader may find it helpful to refer to the Department's information leaflets on the law on bingo, gaming machines and lotteries, which are available on the Departmental website at www.communities-ni.gov.uk/topics/dsd-law-and-legislation/social-law.

4.1 Betting

4.1.1 Existing law

The existing law on betting and related matters is contained in Part II of the 1985 Order and includes provision for general restrictions on betting, the licensing of bookmakers and their offices, the licensing of horse and greyhound tracks for betting purposes, pool betting and the conduct of licensed tracks.

4.1.2 Pool betting in bookmakers offices

Pool betting is a form of betting where gamblers pay a fixed price into a pool then make a selection on the outcome. There are no odds involved; each winner's payoff depends simply on the number of gamblers and the number of

winners. There is a general prohibition on pool betting in Northern Ireland except by means of a totalisator (tote) on a licensed track, a totalisator is a computer that registers bets and divides the total amount bet among those who won. It is understood to have become common practice for local bookmakers to allow pool betting, such as Tote Direct, within their offices, in line with High Street bookmakers in Great Britain and the Republic of Ireland.

Should the law be amended so as to permit pool betting in bookmaking offices?

Yes

No

4.1.3 Enforcement of gambling contracts

The 1985 Order provides that any contract involving gambling is void and no legal action should be taken to recover any money won or paid on a wager. In Great Britain, contracts made for gambling purposes are treated similarly to other contracts. In particular, any debts that arise from gambling will be capable of enforcement in the same way as any other personal or business debts. However, the Gambling Commission has the power to void betting contracts in certain circumstances, for example if it is satisfied that a bet was substantially unfair.

Do you believe that gambling contracts should be legally enforceable?

Yes

No

4.1.4 Cheating

The 1985 Order contains an offence to cheat with respect to gambling, however this only applies when someone actually wins through cheating; a person who cheats and does not win money from another person is not guilty of an offence.

In Great Britain the 2005 Act makes it a criminal offence to cheat at gambling irrespective of whether or not the person actually wins anything as a result of the cheating, or whether the cheating

has the effect of improving the cheat's chances of winning. This means that an 'incompetent' cheat, or one who cheats for another person's benefit, will still commit an offence.

Do you believe that the law should be amended so that those who cheat at gambling commit an offence, regardless of whether or not they are successful?

Yes

No

Do you have any other comments in respect of betting?

Yes

No

If Yes, please provide details

4.2 Commercial Bingo Clubs

4.2.1 Existing law

The existing law on commercial bingo is contained in Part III of the 1985 Order.

4.2.2 Prize gaming in bingo clubs – stakes and prizes limits

The current monetary limits on prize gaming are:

- the maximum stake for one chance to win a prize is 50p
- the total amount taken for the sale of chances and the total value of prizes in a single game must not exceed £120
- the maximum monetary prize is £25

The prize limits in bingo clubs in Great Britain are:

- the maximum payment for one chance to win a prize is £1
- the maximum monetary prize is £100 (where no persons under 18 are permitted on the premises at any time when the game is being played; and £70 in all other cases)

Should the law be amended so as to increase the prize gaming monetary limits in bingo clubs?

Yes

No

4.2.3 Monetary controls on the playing of bingo in a licensed bingo club

There is a range of conditions and monetary restrictions that apply to playing bingo in a licensed bingo club. It must be equal chance gaming and no levy may be charged on stakes or winnings. There is no limit on the size of stakes but these must be returned to players in full as winnings, less any bingo duty payable. The total amount paid out in prizes in any week must not exceed the amounts staked by the players by more than £10,000 and all prizes must be in cash. Club owners may make a charge, not exceeding £10 per day, for admission and a charge not exceeding £5 for each chance in playing the game. Games of linked bingo - bingo played across multiple premises - in licensed bingo clubs are permitted subject to certain monetary limits.

In recent years there has been very significant deregulation of bingo clubs in Great Britain to the extent that there are no monetary controls on the playing of bingo games. Also, rollovers similar to those in the National Lottery are now permitted in Great Britain. As bingo is widely regarded as a soft form of gambling, and given the social framework within which it is played in Northern Ireland, it is argued that there should be no statutory limits here on participation charges and prize

limits. Instead it is considered that the market should determine these limits. A decision to remove these restrictions would mean the end of the principle that prize money must only come from stake money. It could create the potential for 'rollovers' whereby some of the stake money could be retained to offer jackpot rollover prizes.

Should the law be amended with respect to the monetary controls on bingo club games?

Yes No

Should rollovers be permitted?

Yes No

4.2.4 Membership requirement

At present only eligible members (for whom at least 24 hours have elapsed since applying for membership) and their guests may participate in bingo in a licensed bingo club. This rule is generally considered to be out-of-date and an unnecessary bureaucratic burden on both players and club owners.

Should the law be amended so as to abolish the 24 hour membership requirement?

Yes No

Do you have any other comments in respect of commercial bingo clubs?

Yes No

If Yes, please provide details

4.3 Gaming Machines

4.3.1 Existing law

There are three types of gaming machine permitted under current Northern Ireland legislation:

- jackpot machines (£250 prize/50p stake) mainly used in registered clubs
- two types of smaller prize machines, usually referred to as 'higher' (£25 prize/30p stake) and 'lower' (£8 prize/30p stake) amusement with prizes (AWP) machines

A full list of the gaming machine categories for Northern Ireland can be found at **Annex A**, the categories for Great Britain are also provided.

The existing law on gaming by way of a gaming machine is contained in Part III of the 1985 Order. Anyone who wishes to supply or maintain gaming machines must obtain a gaming machine certificate or permit (for one machine) from a court authorising him to do so. The most common premises for the playing of gaming machines are amusement arcades and operating permits for these are granted by local councils. Gaming machines may also be played (without the need for a separate permit) in commercial bingo clubs, bookmaking offices, the bar areas of pubs and hotels, and in registered clubs. Gaming machines – including jackpot machines – may be used as an incidental

attraction at fundraising social events such as fetes and dinners on a not for private profit basis. For gaming machines used as an incidental attraction at such entertainments, there are no statutory limits on the number of machines, stakes or prizes. In addition, 'lower prize' AWP machines may be used at travelling showmen's pleasure fairs.

Should gaming machines – including jackpot machines – continue to be permitted to operate as an incidental attraction at entertainments such as fetes, sales of work, etc provided the entertainments are not run for private gain?

Yes No

Should "lower prize" gaming machines continue to be permitted to operate at travelling showmen's pleasure fairs?

Yes No

4.3.2 Definition of a gaming machine

The current definition for a gaming machine, set out in Part I of the 1985 Order is as follows:

any machine which:

(a) is constructed or adapted for playing a game of chance by means of it; and

(b) has a slot or other aperture for the insertion of money in the form of cash or tokens

In 2003, machines for use in casinos, amusement arcades and bingo clubs began appearing in Great Britain offering traditional casino games, usually roulette; these machines were subsequently introduced in Northern Ireland. Their introduction took advantage of a loophole in the gambling law in both jurisdictions. It was argued that by locating the random number generator (which determined the outcome of the game) separate from the machine itself, the machine did not fall within the definition of a gaming machine.

In Great Britain, this loophole was closed by the 2005 Act, which set out a new definition for a gaming machine. Automated Roulette Machines and the Fixed Odds Betting Terminals (FOBTs) found in bookmaking offices, which have similar characteristics, are clearly treated as gaming machines and regulated as such.

The revised definition for a gaming machine in Great Britain also meant that a range of machines such as ‘crane grabs’, ‘coin pushers’ and ‘penny falls’ type machines, traditionally considered as skill machines, are now regulated as gaming machines.

In both Great Britain and Northern Ireland, machines where the outcome is determined by the exercise of skill

(skill machines), for example quiz machines, are not considered to be gaming machines.

Should the definition of a gaming machine be amended to reflect the variety of machines which now exist?

Yes

No

4.3.3 Gaming machine technical standards

The regulatory regime in Great Britain incorporates technical standards for the operation of gaming machines with respect to game features such as speed of play, display notices and general machine operation; the 1985 Order contains no provisions on any of these features.

A significant proportion of gaming machines in Northern Ireland are manufactured and meet the legal requirements in Great Britain, however the current lack of technical standards here means there is no way to ensure that machines are operated in a fair and open way.

Should the gaming machine technical standards that exist in Great Britain be adopted here?

Yes

No

4.3.4 Increases in current stakes and prizes limits

Stakes and prizes levels in Northern Ireland are lower than those permitted in Great Britain. In Northern Ireland registered clubs may operate 'jackpot' machines with a maximum £250 prize for a 50 pence stake. The equivalent machine in Great Britain, the Category B4, has a maximum stake of £2 and a maximum prize of £400.

Adult areas of amusement arcades may operate the 'higher prize' £25 prize AWP machines for a 30 pence stake. These machines may also be operated in bookmaking offices, commercial bingo clubs and the bar areas of public houses and licensed hotels. The closest equivalent to these machines in Great Britain are Category C machines, these have a maximum stake of £1 and a maximum prize of £100.

The 'lower prize' AWP machines with an £8 prize (30 pence stake) may be used in amusement arcades, commercial bingo clubs and travelling showmen's pleasure fairs. These would fall within the Category D classification of machines in Great Britain, although Category D comprises a range of other machines including crane grabs, coin pushers and penny falls.

Generally speaking, permitted gaming machine stakes and prizes here are significantly lower than those allowed in Great Britain. The regime in Great Britain provides machine gaming ranging from machines with a £5 prize for a 30 pence stake (Category D) to those with unlimited stakes and pay-outs (Category A machines).

Stakes and prizes levels in Great Britain have generally been reviewed on a three yearly basis and can be readily adjusted through secondary legislation; the monetary limits in Northern Ireland have remained unchanged since 2003.

Operators are strongly of the view that monetary limit parity with Great Britain is essential to the viability of the Northern Ireland gambling industry; the differences in the stakes and prizes limits also present significant issues to the industry in sourcing new machines.

Should the law be amended so as to increase gaming machine stakes and prizes limits in line with the corresponding limits in Great Britain?

Yes

No

4.3.5 Payment methods for machine gaming

The 1985 Order only permits the use of coins for the operation of gaming

machines. Industry here have for some time sought a change to the law to permit the use of ‘note acceptors’ – such a change would be particularly necessary if the increases in stakes and prizes discussed earlier in this section were to be introduced. Modern gaming machines in Great Britain use a variety of payment methods, including ‘note acceptors’, a TITO (ticket-in, ticket-out) method or an operator-provided app-based digital wallet.

In Great Britain, however, there also exists, through Regulations and the Licence Conditions and Codes of Practice (LCCP), measures intended to prevent consumers from spending more than they can afford and ensure consumers make regular decisions as to how much money they wish to commit to play a machine. There are also prescribed limits on the amount an individual can deposit onto a gaming machine in any single action.

In practice this means that the use of debit and credit cards for payments to play machines is prohibited; in addition, contactless mobile payment systems such as Apple Pay or Android Pay are regarded by the Gambling Commission as the same as payments to use a gaming machine by means of a card itself as they are simply a medium by which a contactless card payment is

made. TITO methods and operator provided app-based digital wallets are permitted but must adhere to the prescribed limits with respect to depositing funds.

Should gaming machines be able to accept stakes and pay out prizes in forms other than coins?

Yes No

If Yes, please select from below

Banknotes

Yes No

Ticket-in / Ticket Out

Yes No

Debit/credit cards

Yes No

Operator proved digital wallets

Yes No

Other

4.3.6 High-stake high-prize machine gaming (jackpot machines) in licensed gambling premises

In Great Britain, adult only amusement arcades, bookmaking offices, bingo clubs and registered clubs may operate machines with stakes of up to £2 and jackpots of up to £500. There are limits

on the number of such machines that may be run in conjunction with lower value machines and operators must adhere to the relevant licensing codes of practice. Current legislation here only permits jackpot machines, though with lower stakes than in Great Britain, in registered clubs.

Should higher stakes and prizes jackpot machines be permitted in bookmaking offices, bingo clubs and amusement arcades where entry is restricted to those aged 18 and over?

Yes

No

4.3.7 The number of gaming machines permitted in certain premises

At present, a registered club may have up to three gaming machines regardless of the size of the membership or the club premises; this is also the case in Great Britain. The sector has previously suggested that the number of permitted machines should be linked to the size of the club and its membership, up to a maximum of five machines.

Bookmaking offices are currently permitted two machines, in Great Britain the limit was increased to four machines. In practice however, because the legal status of Fixed Odds Betting Terminals is currently unclear in Northern Ireland, many bookmaking offices have as many as four FOBTs as well as two gaming machines.

Should the law be amended so that the number of gaming machines permitted in a registered club is related to the size of its membership?

Yes

No

Should the law be amended with respect to the number of gaming machines permitted in a bookmaking office?

Yes

No

If Yes, how many gaming machines should be permitted in bookmaking offices?

0

1

3

4

More than 4

Do you have any other comments in respect of gaming machines?

Yes

No

If Yes, please provide details

4.4 Lotteries

4.4.1 Existing law

The existing law on lotteries is contained in Part IV of the 1985 Order; under the 1985 Order all lotteries are unlawful unless they are:

- small lotteries ancillary to an exempt entertainment (e.g. at a charitable bazaar, sale of work, fete, dinner, dance, or at a sporting event)
- private lotteries (e.g. traditional sweepstakes in work places and small-scale, fund-raising ballots by societies)

- societies' lotteries or
- part of the National Lottery

Societies' lotteries involve the sale of tickets or chances (to win a prize) to the general public by clubs, associations, institutions etc., in support of 'good causes' and these will be the main focus of this part of the consultation.

Should you wish to make any comment with respect to Private Lotteries or Small Lotteries, these would also be welcome and can be included within your

response to the final question of this lotteries section. The National Lottery is controlled by Westminster legislation, the National Lottery etc. Act 1993, and will not therefore be considered within this consultation.

A **leaflet** is available on the Department for Communities website which provides further details in respect of the other lotteries mentioned above.

4.4.2 Monetary limits on stakes and prizes for societies' lotteries

At present, the maximum price of a ticket or chance to participate in a society's lottery is £1 and no prize may exceed £25,000 (in amount or value) or 10% of proceeds, whichever is greater. No more than 50% of the proceeds of a lottery may be used to provide prizes. The total value of tickets or chances sold in any one lottery must not exceed £80,000. The total value of tickets or chances sold in all the lotteries promoted by one society in any year must not exceed £1m. These limits have remained unchanged for many years and local charities feel they are too restrictive. In particular, the maximum face value of £1 per ticket means that charities cannot run raffles with attractive prizes. The limit of £80,000 which can be raised from ticket sales in any one raffle is also said to be hampering fund raising efforts.

The current legislation also requires that each chance in a lottery must have the same price, in effect this means that the common practice of selling, for example, a book of 6 tickets for £5 where each ticket costs £1 is not legal.

In Great Britain, the £1 stake limit for societies' lotteries has been removed, but the price of every chance in the same lottery must be equal. The rationale for removing the stake limit in Great Britain was that lottery promoters were better placed to judge what the market may withstand. The maximum prize limit is £25,000 or 10% of proceeds, whichever is greater (up to a maximum of £400,000). Ticket sales of up to £4m for an individual lottery are permitted but annual proceeds by one society must not exceed £10m.

Rollovers are becoming increasingly common in societies' lotteries, a rollover occurs where a prize that has not been allocated in one lottery is added to prizes available for allocation in a subsequent lottery, thereby providing a bigger jackpot. Following the 2005 Act, society lotteries in Great Britain are permitted to have rollovers provided the maximum single prize limit is not breached; the 1985 Order does not make explicit provision for rollovers.

Should the law be amended so as to remove the £1 stake limit on society lottery tickets?

Yes No

If Yes, what limit, if any, would be appropriate

£2

£5

£10

Other amount

No limit

Should the principle that the price of every chance in the same lottery must be the same be retained?

Yes No

Should the current limits on proceeds (ticket sales) from an individual lottery and the total amount per society in any year be increased to reflect those in Great Britain?

Yes No

Should the legislation in Northern Ireland be amended to reflect the law in Great Britain on lottery rollovers?

Yes No

- where the total proceeds are £10,000 or less, no more than 20% of the total
- where the total proceeds are more than £10,000, no more than 15% of the total
- in each case the expenses actually incurred, if less

Should the law be amended so that the proportion which can be deducted for expenses is the same, regardless of the amount of total proceeds?

Yes No

Should the law be amended so as to permit a greater proportion of the proceeds to be used for expenses?

Yes No

4.4.4 The use of the internet for the sale of lottery tickets

In recent years the Department has become aware of a considerable growth in the numbers of society lotteries, raffles or draws being promoted online, by charitable organisations, sporting clubs and organisations. In the majority of these promotions, tickets for the lottery or draw are sold and paid for online.

The 1985 Order makes no reference to the provision of gambling services on the internet nor do any subsequent regulations or amendments to the Order deal directly with online

4.4.3 Deduction of expenses

At present, the amount of a society lottery's proceeds which may be deducted to meet expenses (exclusive of prizes) is:

gambling. Regulation 6 of the Lottery Regulations (Northern Ireland) 1994, however, prohibits the sale of any ticket or chance in a society lottery by means of a “machine”. Article 2(2) of the 1985 Order says that, ““machine” includes any apparatus”.

In Great Britain the legislation preventing the sale of society lottery tickets by machine was repealed by the 2005 Act; in addition, National Lottery legislation also allows for the sale of

chances by way of the internet.

Should the law be amended so as to permit the use of the internet in the sale of lottery tickets?

Yes

No

Do you have any other comments in respect of lotteries?

Yes

No

If Yes, please provide details

5. Licensing, Enforcement and Regulation

This chapter looks at current licensing and enforcement arrangements and seeks views as to whether and how this might be amended going forward. The potential for a regulator to be introduced, and how it might function will also be considered.

5.1 Current licensing arrangements

Licensing responsibilities under the 1985 Order currently rest with the courts, district councils and the Department. Courts are responsible for granting:

- bookmakers' licences which authorise the holder to carry on a business or act as a bookmaker
- bookmaking office licences which authorise the holder to carry on business as a bookmaker in the relevant premises
- bingo club licences which authorise gaming (including bingo and gaming for prizes) and subject to a direction by the licensing court, the operation of gaming machines in the relevant premises
- gaming machine certificates or permits which authorise the holder to supply and maintain gaming machines
- lottery certificates which authorise the holders to act as lottery consultants or managers
- the registration of clubs (clubs registered under the 1985 Order are

permitted to have up to 3 "Jackpot" type machines with a maximum stake of 50p and maximum prize of £250).

District councils are responsible for granting:

- amusement permits which authorise the operation of gaming machines and amusements with prizes in arcades and similar premises
- pleasure permits which authorise amusements with prizes (but not gaming machines)
- the registration of societies for societies' lotteries purposes

The Department is responsible for granting:

- track betting licences which authorise betting (bookmaking and totalisator betting) on the relevant horse or dog tracks

Currently, licensing procedures include a requirement for licensing authorities to make an assessment of the suitability of prospective gambling operators to be granted a licence. In practice the general system relies heavily on the consideration of objections from organisations such as the PSNI, as opposed to active investigation by the licensing authorities.

5.1.1 Duration of licences

With the exception of track betting licences, which run for seven years, licences, certificates, and permits granted under the 1985 Order are renewable annually.

In Great Britain, gambling licences are generally open-ended although licensees are usually required to make a contribution annually towards the cost of the licensing system. In terms of better regulation principles it could be argued that the requirement for businesses to make a formal application to renew their licence annually is overly bureaucratic and expensive. However, there are those who would argue that the risk of not having a licence renewed serves to maintain standards in the industry.

The Department's examination of the licensing system indicates a fairly 'settled' industry with few objections to the annual renewal of licences and it may therefore be appropriate to consider a longer licensing cycle; this

must be balanced however against the need to ensure that appropriate safeguards are in place to enable licences to be suspended or revoked where it is deemed necessary.

Is the current duration of licences appropriate?

Yes

No

If no, please select one of the below

3 years

5 years

Open ended

Unsure

5.2 Enforcement

The PSNI is responsible for the enforcement of all parts of the legislation. In the past it has expressed the firm view that enforcement of the gambling law is mainly a social and revenue matter and wish to see responsibility transfer to a more appropriate agency.

Do you believe that the PSNI is the most appropriate agency to enforce the law?

Yes

No

If no, please provide details

5.3 Future regulatory framework for Northern Ireland

Earlier chapters of this consultation have focussed on a number of elements of the current gambling law and sought views as to whether change is necessary. A decision to permit harder forms of gambling here, such as casinos, would have implications in terms of how the industry is regulated.

Previous engagement with stakeholders showed no common view about an appropriate regulatory framework

with some favouring an independent regulator or gaming board while others saw merit in retaining the existing mainly court based licensing system with police enforcement.

Determining the appropriate way forward in respect of the regulatory framework will be determined by what changes to the law an incoming Minister wishes to make and this consultation does not therefore seek to explore this matter in great depth.

It is however useful to outline some of the variety of approaches which might be taken once a Minister has made the position clearer.

- **Continue the current position (No regulatory body) -**

Successive Northern Ireland administrations have taken the view that since large-scale commercial gaming is not permitted here, the necessary scrutiny and regulatory functions can be discharged satisfactorily by existing agencies

- **Establish an independent body –**
In recent years there has been a move towards independent regulation of licensing and enforcement activities across most European states and beyond; an example of this is the Gambling Commission in Great Britain

- **Government regulator -**

Establish a new gambling regulator's office within a Government Department to undertake particular regulatory functions

- **An existing regulatory body –**

Another potential option would be to seek the support of another regulator to carry out the regulatory functions required in Northern Ireland. It is expected that such a body would need to have experience in either the regulation of gambling or of a related subject, one such example might be the Gambling Commission

Do you believe that there is a need for a regulatory body for gambling?

Yes

No

If Yes, which, if any, of the following options do you think would be most appropriate for Northern Ireland?

An independent body

Government regulator

An existing regulatory body

Don't know / No strong view

**Do you have any other comments
in respect of the licensing,
enforcement or regulation of
gambling in Northern Ireland?**

Yes **No**
If Yes, please provide details

Gambling – Final comments

**Do you have any other comments in
respect of the future of gambling in
Northern Ireland?**

Yes

No

If Yes, please provide details

Annex A

Gaming Machines - Northern Ireland

Supply and maintenance of gaming machines

Anyone wishing to supply or maintain gaming machines must obtain a gaming machine certificate or permit from a court authorising him to do so.

Permitted gaming machines

There are three types of gaming machine permitted:

- jackpot machines mainly used in registered clubs

- two types of smaller prize machines (usually referred to as 'higher' and 'lower' amusement with prizes (AWP) machines)

Location, stakes and prizes

Gaming machines may be lawfully used in a limited number of locations and are subject to statutory limits on stakes and prizes as shown in the table below:

Type of Machine	Permitted Locations	Maximum Stake	Maximum Prize
Jackpot	Registered clubs	50p	£250
AWP higher prize machines	<ul style="list-style-type: none"> • Adult only areas of amusement arcades & similar premises • Bookmaking offices • Commercial bingo clubs • Public houses and licensed hotels (bar areas only) 	30p	£25
AWP lower prize machines	<ul style="list-style-type: none"> • Arcades & similar premises • Commercial bingo clubs • Travelling showmen's pleasure fairs 	30p	£8

Gaming Machine Categories

- Great Britain

Category	Maximum Stake £	Maximum Prize £	Permitted Locations
A	Unlimited	Unlimited	No category A machines are currently permitted
B1	5	£10,000 (with the option of a max £20,000 linked progressive jackpot on a premises basis only)	Casinos only
B2	2	500	Betting shops, tracks, casinos
B3	2	500	Bingo halls, adult gaming centres, betting shops, tracks, casinos
B3A (Lottery style games only)	2	500	Registered clubs only
B4	2	400	Commercial clubs, registered clubs, bingo halls, adult gaming centres, betting shops, tracks, casinos
C	1	100	Family entertainment centres, pubs, commercial clubs, registered clubs, bingo halls, adult gaming centres, betting shops, tracks, casinos
D There are five different combinations of stake and prize for the various types of category D machine	10p to 1	15 to 50	Casinos, betting shops, tracks, bingo halls, adult gaming centres, registered clubs, commercial clubs, family entertainment centres, pubs, travelling fairs

Further details can be seen at: www.gamblingcommission.gov.uk/for-gambling-businesses/Compliance/Sector-specific-compliance/Arcades-and-machines/Gaming-machine-categories/Gaming-machine-categories.aspx

Available in alternative formats.

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Draft MUDC response to Department for Communities consultation on Regulation of Gambling in Northern Ireland – February 2020

Mid Ulster District Council welcomes the current consultation on gambling law in Northern Ireland which is part of a move to update *the Betting, Gaming, Lotteries and Amusements (Northern Ireland) Order 1985*. We note that the law in Great Britain was updated in 2005 and there is a definite need to review aspects of the law in Northern Ireland.

Gambling is a somewhat contentious issue and, even among elected members of Council, there are many different personal views. These comments are therefore limited to comments on the issues that are most pertinent to Council's role in the regulation of gambling activity in Northern Ireland and those areas where there is some consensus of opinion. They also take account of the findings of the 2016 Northern Ireland Gambling Prevalence Survey.

Councils are currently responsible for granting:

- amusement permits which authorise the operation of gaming machines and amusements with prizes in arcades and similar premises
- pleasure permits which authorise amusements with prizes (but not gaming machines)
- the registration of societies for societies' lotteries purposes.

Councils are also statutory consultees in relation to bingo clubs and bookmakers for which licensing responsibility rests with the courts.

Normally, Mid Ulster District Council would support proposals to modernise regulatory frameworks to align with the law in Great Britain, where it is in the public interest to do so. Aspects of the 1985 Order require updating to reflect changes in public attitudes, new technology, and other societal developments.

However, it is clear from the 2016 survey that Northern Ireland has a significantly greater incidence of problem gambling than other parts of the UK. Rates of problem gambling in Northern Ireland are more than twice as high as in Wales, more than three times as high as in Scotland, and almost five times as high as in England.

Also, almost 60% of the population declared an unfavourable attitude towards gambling. These statistics alone mean that we are not automatically in favour of changing our law to reflect what is already in place in Great Britain.

In reviewing Northern Ireland legislation, there is a need to balance the wishes of the industry and those who want to see less regulation with those of the public who oppose gambling or see it as potentially harmful and therefore in need of stricter control. As a general principle, any proposed relaxation of gambling laws to reflect a changing society will have to be accompanied by appropriate controls and enforcement.

Section 3 – The future of gambling in Northern Ireland

This Council would not advocate for changes in legislation to provide for commercial casino gaming in Northern Ireland, nor would we advocate for Sunday opening of bookmaking premises and commercial bingo halls. However, if the outcome of this consultation is that public opinion is now in favour of a change in the law, this would require appropriate regulation and enforcement.

On the same basis, if public opinion supports a relaxation of the law regarding gaming activities on licensed premises, any such changes need to be rigorously monitored and controls enforced.

We note that the 2016 Prevalence Survey does not suggest a strong demand for Sunday gambling. However, we acknowledge that some people will be able to access gambling online and in the Republic of Ireland and the current prohibition may encourage illegitimate activity.

In relation to online gambling, our main concern is that the Northern Ireland public are protected as consumers, that the law does not permit under-age gambling, and that safeguards are in place to protect other vulnerable groups (e.g. those for whom gambling may become problematic). We therefore favour restriction on the way people can pay for gambling, i.e., a prohibition on the use of credit cards.

We would not support the removal of the current ‘demand test’ in relation to applications to license new gambling premises.

We have some concerns that current residency and incorporation requirements and age requirements for gambling operators may be directly or indirectly discriminatory on grounds of race or age. We acknowledging the rationale for restrictions but suggest there is a need to carry out an equality impact assessment on these elements.

In relation to measures designed to protect children and vulnerable people and the public generally, for example, restrictions on advertising and promotional prize draws, we generally favour robust legislation. We do not necessarily support the provisions in the 2005 Act which give greater freedom to advertise gambling in Great Britain. However, it is important that there is a level playing field across the industry and that any controls on advertising apply and can be enforced equally across different media.

Problem gambling – Problem gambling is “gambling to a degree that compromises, disrupts or damages family, personal or recreational pursuits”. Given that Northern Ireland has a higher proportion of ‘problem gamblers’ than other parts of the UK, we would strongly favour measures to provide funding for research, education and treatment of problem gamblers. However, any proposals again need to apply fairly and proportionately across the sector and reflect the demography of Northern Ireland.

Section 4 – sector specific issues

Mid Ulster District Council believes that there are some areas where the law may need updating, for example to reflect inflation (limits on stakes or prize money) and the views of charities etc. who use lotteries for fundraising, or to align with the definition of a gaming machine or the technical standards that apply in GB. However, any such proposed changes should have the support of the general public and should not create an additional burden on existing enforcement bodies.

The Council would not object in principle to revising the limits on lottery stakes and prize money, to explicit provision for rollovers and provision to allow the sale of lottery tickets via the intranet, in line with current arrangements in GB.

In general, we do not favour changes to payment methods for gaming machines that will make it easier for consumers to spend more than they can afford. The controls that apply in Great Britain may not be adequate to deal with the higher incidence of problem gambling in Northern Ireland. It is important that feedback from organisations which support people with gambling addictions is taken into account fully in any proposals.

Section 5 – Licensing, Enforcement and Regulation

Mid Ulster District Council believes it would be appropriate to extend the duration of gambling licenses from the current one year to perhaps three years. This would strike a balance between effective regulation and the burden on Council.

We believe that the PSNI remains the most appropriate agency to enforce the law.

Regarding a future regulatory framework, we believe there is a need for a new regulatory body for gambling in Northern Ireland, possibly an independent body along the lines of the Gambling Commission in GB. However, any such body would require strong powers and adequate resources to enable it to be effective.

In conclusion, Mid Ulster District Council favours the development of balanced proposals that reflect the views of the public, those who work in the gambling industry, current regulation and enforcement bodies and other key stakeholders such as charities and addiction support bodies. It is not appropriate for Council to take a moral stance on the issue but we believe that those who profit from the gambling industry should share responsibility for dealing with some of the negative impacts associated with gambling.

We look forward to sight of draft proposals in due course which are equality and rural needs impact assessed.

28 January 2020