

19th August 2009

Major Review of Gambling

Dear Mr. Walsh,

Many thanks for your letter dated 21st May 2009 inviting submissions to the major review of gambling being undertaken by the Department of Justice, Equality and Law Reform. The Society of St Vincent de Paul (SVP) welcomes the opportunity to input our views to this process. Some forms of gambling are used by the Society to generate income to support our work and we strive to ensure that these activities do not involve risky behaviour or target children and young people.

In this submission we will address the features of a gambling code which would protect young people and those who are vulnerable. The SVP supports the proposal that social responsibility and the protection of children, young people and the vulnerable should underpin the regulation of the gambling sector. People on low incomes are a particular vulnerable group which must be considered in this review. Debt is a serious problem for many of the people on low incomes who are assisted by the SVP and in some cases can be a consequence of gambling.

A recent request for assistance received by the SVP Dublin region illustrates the consequences of problem gambling which the Society is dealing with. A young man in receipt of jobseeker's allowance who had never been assisted by SVP before called in need of help, as he has gotten into financial difficulties through gambling. He is now in arrears with his rent and is being threatened with eviction and homelessness. This can be a challenging issue for conferences as they are being asked to deal with the consequences of gambling, while the causes of the problem remain to be tackled.

We are particularly concerned at the increase in online gambling activity, which is almost impossible to regulate and restrict access to. The offering of free bets to customers in return for setting up an online account provides incentives to gamble online and this practice should be investigated to establish whether these incentives are necessary and whether they have an impact on problem gambling or encouraging younger people and those on lower incomes to gamble online.

Offering free bets to customers to entice them into betting shops should also be examined as it may unnecessarily incentivise gambling which can place a strain on the limited resources of low income households. Gambling promotions such as these could be restricted similarly to the way that drinks promotions have been restricted in order to curb potentially problematic and risky behaviour. SVP recommends that the new gambling code considers prohibiting the offering of free bets as they are an incentive to gambling.

The proposal for legislative provision for self-exclusion from gambling and gaming premises, whereby individuals who believe that they have a problem with their gambling can voluntarily exclude

themselves from a gaming/gambling establishment as recommended by the Report of the Casino Committee¹ is supported by the SVP.

However, while this is one element of a gambling code which would protect the vulnerable, we would like to see this supplemented with protections for people who may have a problem with gambling but have not yet acknowledged it. Research is necessary to determine what works in preventing problem gambling and to protect and support people with a gambling problem, particularly those who use the Internet. Possibilities include providing the option of setting time, money and loss limits on online gambling, displaying a checklist of warning signs of problem gambling prominently both on web pages and in gambling/gaming premises along with contact details for support groups, and guidelines for managing gambling safely.

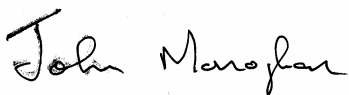
The gambling sector itself has a responsibility to prevent problem gambling, to protect consumers and to consider the social implications of gambling. The SVP suggests that a fund be established which uses a portion of gambling profits and proceeds to provide counselling for those affected by problem gambling and public information around the risks associated with gambling.

To summarise, the features of a gambling code that emphasises social responsibility include:

- People on low incomes are one of the groups identified as vulnerable in the code
- The social implications of gambling must be clearly outlined and considered.
- Gambling promotions which unnecessarily encourage gambling or target vulnerable groups such as young people and those on a low income should be restricted or eliminated.
- Recommendations for preventing and dealing with problem gambling should be developed, based on research.
- The gaming industry itself has a responsibility to prevent problem gambling and protect consumers who gamble and this should be underlined in the code.
- Funding for highlighting and preventing the risky aspects of gambling, as well as for support for those with a gambling problem should be provided by the industry in order to ensure that the industry meets its responsibilities for some of the social consequences of gambling.

The development of gambling regulations which protect young people and vulnerable people on low incomes in particular would be very much welcomed by the SVP.

Yours sincerely,



Professor John Monaghan
National Vice President
Society of St Vincent de Paul.

¹ DJELR *Regulating Gaming in Ireland: Report of the Casino Committee*