



CHURCH of IRELAND GENERAL SYNOD
CHURCH in SOCIETY COMMITTEE
Social Justice and Theology (NI) Sub-Committee

Betting and Gaming Law
Proposed changes including relaxation of Sunday restrictions
Consultation Paper published by Department for Social Development (NI),
December 2006.

The Church in Society Committee of the General Synod of the Church of Ireland seeks to identify, contribute to, challenge and develop areas of living today where the mission of the Church can be active and the love of God shared. It does so by seeking an informed understanding of the societies in which we live and aims as much to listen as to speak and to be informative and practical in the fruit of its work. The sub-groups of the Church in Society Committee are authorized to issue statements and reports in their own names. The following submission has been produced by the Social Justice & Theology Sub-Committee (Northern Ireland) of the Church and Society Committee and, as such, may not represent the views of the Church of Ireland as a whole.

Response

1. The Paper proposes the removal of the prohibition on the opening of book-making offices on Sundays (other than Christmas Day), the restriction of Sunday opening hours to 10.30am to 6.30pm, and the provision of employment protection rights for workers in bookmaking offices. We welcome the continued prohibition on opening on Christmas Day and Good Friday. However, the Paper says that the Department wants to test local opinion on relaxation of the statutory prohibition on Sunday opening but it appears that the decision has already been made and the Department has prejudged the reaction. This is apparent from the statement that the current position can not be maintained, without giving any justification for that conclusion, apart from bringing Northern Ireland law into line with the rest of the United Kingdom. The Paper says that there will be restrictions on Sunday opening hours in recognition of the special nature of Sunday for many people but it then goes on to permit longer opening hours than are available for many shops on Sundays. Again the Paper does not give any reasons why these particular hours of business were chosen. On employment protection rights, no information is provided on whether similar rights are operating effectively or fairly in other aspects of Sunday gambling. We wonder if any investigation has actually been done into that issue.
2. The same points can be made in relation to the proposals in Part 3 on Sunday bingo and other gaming in licensed gaming clubs. We would also make the point here that the Paper does not pay appropriate attention to the protection of vulnerable people in this area and in particular it is disappointing that there is no consideration of the dangers of increasing opportunities for gaming at a time when the province has extremely high levels of personal debt, with all the serious social and family problems that that brings. Has the Department done any research into any link between levels of debt and use of gaming machines or bingo?

3. In Part 4, we welcome the decision not to extend the use of credit cards for gaming purposes. We also welcome the fact that there are to be no changes as regards lower value AWP (amusement with prizes) machines which unsupervised under 18s can use.
4. We have no comments specifically on Part 5, relating to pools competitions, except to reiterate concerns about the protection of vulnerable people, the addictive nature of easy-access gambling and the cynical effect that the encouragement of gambling has on the fabric of society.
5. In the Partial Regulatory Impact Assessment the Department says that the “do nothing” stance is unrealistic and would have a negative effect on the business sectors involved. However the Paper does not address the potential negative impact on persons engaging in gambling. The Paper says that the proposals are intended to reflect changing social attitudes but there is no indication of the extent to which social attitudes have actually changed and no reference to any evidence supporting this conclusion. Indeed the Paper does not contain any reasoned policy justification for these proposals beyond bringing the law into line with the rest of the United Kingdom. Has the Department conducted research or examined research by others on relevant social attitudes or the public demand for these changes?

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