

**Royal College of Psychiatrists NI (RCPsych NI) Response to:
DfC Consultation on Article 180A of The Betting, Gaming, Lotteries
and Amusements (Northern Ireland) Order 1985: Initial Gambling
Code of Practice**

1.0 Introduction about RCPsych NI:

The Royal College of Psychiatrists (RCPsych) is the statutory body responsible for the supervision of the training and accreditation of Psychiatrists in the UK and for providing guidelines and advice regarding the treatment, care, and prevention of mental and behavioural disorders. Among its principal aims are to improve the outcomes for those with mental illness and to improve the mental health of individuals, families and communities.

The College has approximately 450 Members in Northern Ireland (including Doctors in training) who provide the backbone of the local Psychiatric service, offering acute and community treatment, as well as specialist care and consultation across a large range of settings.

This response is submitted on behalf of the Devolved Council of the Royal College of Psychiatrists in Northern Ireland with particular reference to the views of its Faculty of Addictions Psychiatry.

2.0 Substantive Response/Comments:

- **We welcome the measures suggested & believe they will have positive benefits in the regulation of on-premises gambling. Unfortunately however we do not believe the measures will have a significant impact on online gambling and we believe the measures would be strengthened by the inclusion of a commitment to set up an independent regulator for gambling in Northern Ireland to oversee adherence to gambling laws and licensing with regulatory powers comparative to the Gambling Commission or the Regulatory Authority of Ireland which regulate gambling in Great Britain and Republic of Ireland respectively.**
- **We welcome the measure to restrict spending on credit and regarding the placement of ATMs. We believe consideration should**

also be given to measures to protect people from overspending using debit transactions. Consideration should be given to implement financial risk checks, as recommended in the UK Government White paper [High stakes: gambling reform for the digital age - GOV.UK](#) or to prohibit the use of debit cards for direct payments as legislated in [The Gaming Machine \(Circumstances of Use\) Regulations 2007](#)

- We welcome the measures to verify age and to protect children from exposure to on-premises gambling. However, we have concerns that the measures will only address/regulate a small portion of gambling in Northern Ireland as they do not address online gambling which will remain largely unregulated compared to ROI and other parts of the UK. We agree with the Northern Ireland Assembly All Party Group on Reducing Harm Related to Gambling Report recommendation that online gambling sites wishing to operate in Northern Ireland should be required to have robust age verification checks to protect children and that, where breaches of the law are identified, proportionate punitive measures should be imposed.
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- We believe measures to reduce young people's exposure to gambling advertising should be more explicit than contained in the code. The measures contained within the code raise the issue of advertising to children but do not include specific measures to reduce this. For example, they do not include a specific recommendation to curtail gambling advertising in televised sport or before a watershed. The recent YouGaMSI study by Maynooth University and Ulster University [Code Red: Young People and their Exposure to Gambling Marketing through Media and Sport on the island of Ireland \(maynoothuniversity.ie\)](#) found that children in Northern Ireland are being exposed to gambling advertising when watching UK-based sports on television, that young people (aged 14-24 years) are exposed to gambling marketing through sports consumption on their mobile phones and on television and that this marketing has been associated with a normalisation of a relationship between betting and sport. To reduce exposure of young people to gambling marketing effectively, we believe legislation to curtail the volume, frequency and timing of gambling marketing online, on broadcast and on-demand television distributed before a watershed is necessary. Sports organisations should be required to eliminate their reliance on gambling marketing at all sporting events venues, and from areas visible in broadcast programmes.
- We welcome the commitment to offer access to treatment for people who develop gambling disorder. We would like to highlight the current lack of services available for people with gambling disorder in Northern Ireland and more specifically, the lack of any

statutory treatment services for people with gambling disorder with more serious or complex needs.

- **While control of gambling in Northern Ireland is largely devolved to Northern Ireland, we would highlight that remote gambling operators need to be licenced by the Gambling Commission to advertise in Northern Ireland. As such, we would urge the UK Government and NI Executive to discuss the fairest and most effective mechanisms through which gambling harms could also be addressed in Northern Ireland, where there is currently a lack of provision. We support a gambling levy, to apply to all gambling, implemented either through legislation in Northern Ireland or as an agreed portion of a statutory levy on gambling operators in Great Britain to reflect their operation in Northern Ireland, as recommended by the Northern Ireland Assembly All Party Group on Reducing Harm Related to Gambling Report, to raise funds to support research and the development of services for people in Northern Ireland affected by problem gambling.**

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The RCPsych(NI) appreciates having been consulted and is happy to be contacted for any clarification.

Dated: 19th December 2024



**Dr Julie Anderson Chair RCPsych NI & Vice President RCPsych
- on behalf of RCPsych NI**

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