

# Economic Development White Paper

**PURPOSE OF CONSULTATION** The purpose of these consultation papers is to give the public an opportunity to guide the development of new law and policy for the gambling industry in Jersey. This consultation paper sets out the issues and suggests questions which - if you answer them - will provide useful information for the Shadow Gambling Commission. It is important that the shadow Commission gets your views and that you take the time to think about the issues in this paper and what it means to you and your Island. This is your chance to say exactly what you think.

**DEADLINE FOR RESPONSES**

Friday, 3<sup>rd</sup> August 2007

**SUMMARY / QUESTIONS TO CONSIDER**

The States has agreed in principle to modernise outdated gambling legislation. Broadening the Industry, the first in this consultation series, discusses what is currently permitted in Jersey, the restrictions placed upon the industry and the introduction of new forms of gambling.

This paper discusses:

- Existing limitations on licensed betting offices (LBOs) and asks whether these restrictions are still required.
- A wider range of gaming machines that offer different games and larger jackpots and whether these machines should be permitted in Arcades or remain wholly inside LBOs.
- Permitting and licensing commercial card clubs.
- The regulation of online gambling.
- Alternative forms of gambling such as commercial bingo and casinos do not form part of the modernisation plan for gambling, but the paper concludes by seeking opinions on this form of gaming.

Regulatory Principles are discussed in the second paper in this consultation. The shadow Commission believes regulatory principles for a well regulated jurisdiction should ensure the vulnerable and young are protected; gambling is transparent and fair; gambling is protected from criminal involvement, and gambling is accountable and subject to audit. The shadow Commission proposes:

- That a licensing regime is adopted for LBOs and also for organisations that have any direct contact with gambling related devices e.g. internet hosting providers, gaming machine suppliers, etc.

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- Current licence fees should be raised to a level that better reflects the realistic cost of regulation.
- The creation of a levy on gambling income dedicated to providing resources for the treatment, monitoring and research of gambling related harm.
- The introduction of civil powers to fine licensees for less serious misconduct.
- The paper concludes by asking for views on an advertising policy for gambling in the Island.

Harm Reduction is the focus of the third consultation paper. Gambling can be a problem for a small number of people and the shadow Commission is recommending that future gambling policy should be based on a strategy of education, counselling and research.

The shadow Commission discusses:

- Education is vital to both support those who have a problem and help prevent others from developing one.
- Whether the reality of gambling should form an educational programme for schools
- The extent of information an adult should have to inform them whether they want to gamble or not.
- Support groups for gamblers.
- The information gambling establishments should provide.
- How to introduce self exclusion from gambling establishments.
- The shadow Commission proposes the creation of a specific fund for this education, counselling and research strategy and asks for opinions on alternatives for funding these schemes.

There is no rule on the reading order of the papers, but it is recommended that you start with the first paper, “Broadening of the Industry”.

**FURTHER INFORMATION** There are three consultation papers: “Broadening the Industry” is the first, “Regulatory Principles” is the second and the third paper is “Harm Reduction”. All papers are available from [www.gov.je](http://www.gov.je) (Government web site), the States bookshop, the public library and the Economic Development Department at the address below. Comments received by the 3<sup>rd</sup> August will be analysed and used to inform the drafting of the new gambling law.

### SEND COMMENTS TO

Shadow Jersey Gambling Commission 26/28 Bath Street St. Helier Jersey JE2 4ST	Tel. +44 (0)1534 448150 Email <a href="mailto:gambling@gov.je">gambling@gov.je</a> Fax +44 (0)1534 448170
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### This consultation paper has been sent to the following individuals / organisations:

The Public Consultation Register  
All States Members

All Parish Halls

General Practitioners (GPs)  
Representatives of the various faith groups  
Gambling Industry representatives

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Gambling Assembly  
States Police and all States Departments  
Jersey Race Club  
Breweries

Community Counselling for Jersey Trust  
Chamber of Commerce  
Jersey Hospitality Association

**SUPPORTING DOCUMENTS**

Broadening of the Industry  
Regulatory Principles  
Harm Reduction

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## Background

A new gambling law for Jersey is urgently required. Since the present law was approved in 1964 the worldwide gambling industry has seen many developments and changes. Forty years ago many people took a very different view on gambling than they do today. The current law is cumbersome and complicated, putting large numbers of rules in place to cover social and club gaming (such as raffles and bingo) whilst doing very little to regulate the professional gambling industry.

The States has already decided (March 2005) that it wants a new gambling law, but there is debate about what should be in it. For that reason, the Minister for Economic Development approved the creation of a shadow Jersey Gambling Commission to make recommendations from a professional and independent perspective.

The shadow Commission has produced 3 papers to help Islanders put their views across in an informed way. This paper is about Broadening the Industry. The shadow Commission wants to know your views about the types of gambling that might be allowed in the new law.

The other papers are about types of regulation and harm reduction. Please look at these papers as well if you want to and send us your views.

## Shadow Jersey Gambling Commission

On the 15th December 2006 the Assistant Minister for Economic Development announced the appointment of three shadow Commissioners to sit on the shadow Gambling Commission. The role of the shadow Commissioners is to prepare for the transition to a statutory Gambling Commission and to advise the Minister and Assistant Minister for Economic Development on changes to the Island's gambling laws.

The shadow Commissioners will work with senior managers within the Economic Development Department to ensure that:

- Jersey retains its excellent international reputation as a well regulated jurisdiction;
- business growth and investment is encouraged; and
- potential harm is minimised and programmes introduced to protect the young and the vulnerable.

## Broadening the Industry

The present law is very restrictive and limits commercial gambling to high street bookmaking and betting at the race course. The law sets a limit on how many licensed betting offices (LBOs) there can be in Jersey and the number of gaming machines (fruit machines) they may have.

Bookmakers offer bets on both 'live' and 'virtual' racing. Virtual racing is a computerised version of a real horse race but the outcome is decided by a random number generator (RNG); this is a device designed to create unpredictable outcomes. However, the RGN and other critical data are sometimes maintained in other jurisdictions. Do you think that LBOs who offer this form of gambling should only do so on the understanding that the RNG is located in Jersey, or would it be

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acceptable if these systems were overseas, but made accessible for review and inspection?

The law presently prohibits LBOs from opening on a Sunday, but does allow betting on the race track, the operation of credit betting (or telephone betting) and gambling, such as Crown & Anchor and lotteries, at charity fairs. Racing and sporting events now happen on a Sunday and other jurisdictions have allowed their betting shops to open to take advantage of the betting opportunities these activities provide. What is your opinion on Sunday gambling? Should all gambling be prevented or should betting shops also be allowed to take bets?

Fruit machines are only allowed in LBOs and the maximum number they can have is two per shop. The law fixes the jackpot per machine at £25 and the stake per play is up to 30p. The industry is interested in raising these jackpots and introducing other types of gaming machines, such as Fixed Odd Betting Terminals (FOBTs). FOBTs are electronic gambling machines and look very similar to 'touch screen' quiz games. Rather than the one game offered by fruit machines FOBTs offer bingo, roulette, virtual horse racing and penalty shootouts. They also differ from fruit machines because they provide the chance to place multiple bets on the outcome of one particular game. The shadow Commission wishes to highlight the fact that FOBTs are generally used to play roulette, a casino table game, in which several bets are usually made in an attempt to select the winning number. The minimum bet is between 20 pence and £1 and the maximum is £15 per number and £100 on multiple bets. The maximum amount that can be won on any game in the UK is £500.

The shadow Commission is interested to receive your views on fruit machines and if you think they should only be allowed in LBOs, or if you think they could be permitted in other strictly adult areas. They could for example be permitted in pubs and clubs. If FOBTs were to be introduced do you think LBOs would be the right venue for these machines?

The law also permits amusement arcades. An 'amusement premises licence' has to be held to offer, amongst other games, fruit machines with a £5 jackpot. An 'amusement premises licence' is also required for any premises which have more than 6 machines. What are your views on these small payout machines? Is the law too restrictive on arcades?

Crown and Anchor is a traditional dice game still played in Channel Islands. The law allows the hosting of a table by permit and the game can only be played if it is a small entertainment attached to a large event, such as a race meeting or the Battle of Flowers. The law is very specific and no person can host Crown and Anchor for personal profit. Like lotteries and bingo, all proceeds after the deduction of expenses have to go to a society or charity. The shadow Commission is very keen to see that Crown and Anchor remains part of Jersey's heritage and is considering the introduction of clearer legislation to ensure that charities and societies fully benefit from the playing of this game at their events. To achieve this, the shadow Commission is considering the creation of individual permits and linking them to specific events.

Bingo and lotteries can currently only be arranged to benefit good causes such as charitable or society fund raising purposes, and a permit to do this has to be applied for from Gambling Control. The shadow Commission believes that lotteries should

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be reserved for charitable causes, but does have some sympathy with those retailers who would benefit from being able to promote themselves by holding "in store" lotteries. In this instance a purchase would qualify a customer to enter a prize draw or lottery. The shadow Commission would recommend that promotional competitions should remain free to enter. There is very little difference between a prize draw and a lottery and the shadow Commission believes that extending lotteries into the commercial sector could lead to possible abuses. The possible introduction of the National Lottery to the Channel Islands will be the subject of another consultation paper later in the year.

The shadow Commission is also considering revising the Law as it applies to Card Clubs. Recently there has been increased popularity in card games such as poker and the Commission recognises that this demand should not be overlooked. We would be very interested in your views on the licensing of Card Clubs and the extent to which they could operate commercially.

Back in the 1960s the legislators could not have predicted the invention of the internet or the possibility of gambling online. Because the law does not recognise this form of gambling, it makes it illegal to provide these services as a business in Jersey. The law, however, does not stop people from gambling over the internet and the shadow Commission recognises that this form of gambling cannot be prevented and as such cannot be ignored. Online gambling is now very popular; jurisdictions such as Alderney license several successful multinational companies and many of these companies are listed on the London Stock Exchange. The shadow Commission recognises that Jersey is in a very good position to attract online operators to the Island. There would also be several economic benefits for Jersey and a licensing regime would aim to ensure player safety and protection while keeping gambling free of criminal involvement.

The shadow Commission is working to create regulations that would provide remote gambling companies with the opportunity to operate from Jersey if a disaster occurred in their home jurisdiction. These recommend thorough background checks and licensing for both the remote gambling companies and those Jersey based firms that would 'host' the operation if a disaster occurred. The shadow Commission believes that if these regulations receive approval they will act as a yardstick to measure the interest some operators may have in locating to Jersey.

There is only one race course in Jersey and the Jersey Race Club organises some 9 or 10 meetings throughout the year. The shadow Gambling Commission would be interested to learn if you have any views on the introduction of other kinds of racing into the Island?

There is also the question of alternative forms of gambling and whether they should at some future date be introduced into the Island. In March 2005 the States voted against the proposition of introducing commercial bingo and permitting the operation of a casino, but the overseas popularity of both gambling activities cannot be ignored. While the Minister has no plans to reintroduce the proposition to the States, the shadow Commission wants to use this opportunity to see what the public attitude is to casinos and bingo. Any other forms of gambling not presently allowed can also be referred to.

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# Questions

Many of these questions are phrased in such a way that they are quite specific. However, the shadow Commission does not want you to feel restricted by these questions and if you feel that other matters are important, please feel free to include them either by a particular question, or at the end.

## Licensed Betting Offices (LBOs) & Bookmakers

- The law only allows 29 LBOs to operate in Jersey. Do you believe this restriction is still necessary?
- Should there be restrictions on the types of gambling permitted in LBOs?
- Do you think that the devices that run virtual racing should be based in Jersey? Or would it be acceptable if these systems were overseas, but made accessible for review and inspection?
- What is your opinion on Sunday gambling? Should gambling on Sunday (credit betting, charitable gaming, race course bookmaking) be allowed? Should LBOs also be allowed to take bets on Sunday's?

## Fruit Machines

- Jackpots have been frozen at £25 for a number of years. Should they be increased and how often should these prizes be reviewed?
- Should LBOs be able to operate fruit machines with larger prizes such as £500 to £1000?
- Should LBOs be permitted to operate linked progressive jackpot games? E.g. if a bookmaker has several shops they could electronically link the cash in each machine to create a larger jackpot.
- Fruit machines with £25 jackpots can only be found in LBOs. Should they be permitted elsewhere and if so, where?

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- Arcades are currently allowed £5 jackpot machines. The shadow Commission is currently considering the position of these machines. Would you like to see them removed? Remain but screened off from under 18s or maintain the status quo?
- If FOBTs were to be introduced do you think LBOs are the right venue for these machines?
- Should FOBT numbers be limited?
- Should there be restrictions on stakes and prizes for FOBTs?

#### **Crown & Anchor**

- Currently, Crown and Anchor can only be played at licensed events. Do you think that Crown and Anchor should be permitted in other circumstances?

#### **Lotteries and Prize Draws**

- Should private companies be allowed to offer “pay to enter” lotteries as a means of promoting sales?

#### **Card Clubs**

- Should commercial card clubs be allowed?
- If so, what restrictions, if any, should be placed upon them e.g. not open to the public?
- Should these clubs also be allowed to offer other forms of gambling? For example machines, dice games, table games or others?

#### **Internet gambling**

- Should online gambling firms be allowed to operate from Jersey?

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- The shadow Commission proposes that all operators should be vetted and licensed. Is this the right approach?

### **Horse Racing**

- Should other forms of racing or gambling be permitted at the race track?

### **Other Gambling**

- During the debate in 2005, the States rejected the Economic Development Committee's proposal to allow a casino. While the Minister is not currently prepared to consider a casino, the shadow Commission would like to have your views on the pros and cons of Jersey having a casino at some time in the future.
- What are your views on commercial bingo?
- Would you wish to see any other forms of gambling introduced to Jersey?

**Please provide any other information that you see relevant to this consultation paper.**

## **Have your say**

We would be delighted to receive your views on the questions we have posed, or on any other aspect of this consultation document. The consultation period will close Friday, 3<sup>rd</sup> August 2007.

Please send your responses to our questions, and any other comments you wish to make to the following address

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Shadow Jersey Gambling Commission  
26-28 Bath Street  
St. Helier  
JE2 4ST

Or click on the link to e-mail us at [gambling@gov.je](mailto:gambling@gov.je)

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## Appendix: Broadening the Industry

The current gambling legislation is outdated and in need of modernisation. The new legislation should promote activities that allow greater public choice and allow industries to contribute positively to tourism, recreational and employment opportunities, generate revenue for the government, and develop and operate in the public interest.

Most jurisdictions have updated their gambling laws to allow them to benefit from the expansion of the gambling industry, not only from betting offices, bingo halls and casinos, but also from gambling offered on the Internet.

In October 2006 there were an estimated 2300 gambling websites operating globally with 8% of this market reported as UK based (including Gibraltar). According to the Department for Culture and Media & Sport (DCMS) the majority of these websites were registered in just a few jurisdictions. There are about 85 jurisdictions<sup>1</sup> around the world offering some form of online gambling licences. Forty three<sup>2</sup> of these jurisdictions have web sites in English and accept play from any location in the world. The list below itemises the most popular locations and the number of operators registered there in 2005:

• Antigua & Barbuda	537
• Costa Rica	474
• Kahnawake Mohawk (Canada)	401
• Curacao	343
• Gibraltar	111
• United Kingdom	70
• Belize	60
• Alderney	28

## JURISDICTION ANALYSIS

### South Africa

The South Africa National Gambling Board (NGB) oversees the provincial gambling boards that regulate all forms of gambling in South Africa. It was established by the National Gambling Act. The Act makes provision for the regulation of casinos, gambling, betting and wagering and promotes national standards in relation to gambling throughout South Africa.

The gambling industry in South Africa is worth some Billion RAND and the regulation of gambling is expected to enhance the national policy of reconstruction and development. One of the main objectives underlying the regulation of gambling is that the industry must contribute directly to the growth of the economy, create jobs and promote tourism.

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<sup>1</sup> <http://www.gamblinglicenses.com/licensesdatabase.cfm>

<sup>2</sup> <http://online.casinocity.com/jurisdictions>

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The NGB currently regulates the horse racing industry, sport betting, lotteries and casinos. Recently, the NGB released a draft Bill to expand the industry to Interactive Gambling (internet gambling). This Bill will allow internet gambling companies to set up and operate out of South Africa.

The Black Economy Empowerment Committee released an interim report entitled *“Internet Gaming in South Africa: Implications Costs and Opportunities”*<sup>3</sup>. The report outlines the growth of the internet and the opportunities afforded by the industry. The report concluded and recommended:

*“That the National Gambling Board adopt the introduction of a legal and well regulated Internet gaming industry in South Africa as a high priority project, to be planned, regulated, co-ordinated and, in due course, administered by the National Gaming Board under an amended National Gambling Act;*

*That the National Gambling Act be amended as to permit wagering and gaming to be conducted over the Internet, subject to such regulations as may be promulgated by the responsible Minister in National Government, and such licensing procedures as may be required by the National Gambling Board.”*

This led to the release of a second report *“Report on the regulation of Interactive Gambling”*<sup>4</sup>. This report was the basis for the draft Internet Gambling Bill released earlier this year to allow internet gambling in South Africa.

## **Alderney**

Alderney had no form of gambling legislation, or any gambling industry prior to the launch of the Alderney Commission. The Alderney Commission is independent and non-political and was established in May 2000. The Commission regulates gambling on behalf of the States of Alderney. The mission of the Commission is to provide a regulatory environment for interactive gambling and to protect the reputation of Alderney.

The Alderney legislation encompasses three Ordinances:

- The Interactive Gaming Ordinance;
- The Electronic Betting Ordinance; and
- The Bookmakers Ordinance.

Alderney took a slow and cautious approach to gambling, initially allowing a few betting operators to operate and learning from this experience. Alderney now has a full eGambling licensing framework with major UK internet gambling companies already operating from the Island.

The government of Alderney actively supports the development of online gambling and betting in the Island. The Alderney Commission in the 2005 accounts reported over £2 Million surplus carried forward.

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<sup>3</sup> [http://www.ngb.org.za/uploads/5\\_InteractiveGambling.pdf](http://www.ngb.org.za/uploads/5_InteractiveGambling.pdf)

<sup>4</sup> <http://www.ngb.org.za/uploads/reportOnTheRegulationOfInteractiveGambling1.pdf>

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## Isle of Man

The Isle of Man (IoM) in 2001 was one of the first jurisdictions in the world to introduce legislation specifically designed to introduce and regulate online betting and gaming. However, the IoM Gambling Control Commission aims to consolidate all laws relating to gambling under one Act. Currently, only online betting businesses operate from the Isle of Man. The planned change in legislation is intended to clarify the licensing process and attract online gambling firms to relocate to the island.

The IoM introduced two new Regulations in 2006 which enabled the development of IoM based Disaster Recovery provisions for online gambling and the advertising of online businesses that are not licensed within the jurisdiction.

Fixed Odds Betting Terminals were introduced to the Isle of Man in 2006 and limited to licensed betting offices. The jackpot was reduced from the UK top prize of £500 to £250 and only two machines are allowed in each betting office. New legislation is anticipated in 2007 to modernise laws in respect of gaming machines which are currently subject to outdated restrictions. There are over 120 sites in the IoM permitted to operate £35 jackpot machines.

## Conclusion

The jurisdictions mentioned in this annex are just a few examples of where an administration has successfully updated antiquated gambling legislation. Although each example is slightly different to the others, there are a number of common themes that Jersey will also have to consider:

- the need to ensure that legislation keeps up with the times and reflects changes in technology and advancements in the gambling industry; and
- the desire to promote greater consumer choice balanced by the necessity of ensuring that a safety net is established to protect the young and the vulnerable.

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