



Northern Ireland  
Assembly

Committee for Communities

# OFFICIAL REPORT (Hansard)

Betting, Gaming, Lotteries and Amusements  
(Amendment) Bill: Committee Deliberations

20 January 2022

# NORTHERN IRELAND ASSEMBLY

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### Betting, Gaming, Lotteries and Amusements (Amendment) Bill: Committee Deliberations

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**Members present for all or part of the proceedings:**

Ms Paula Bradley (Chairperson)  
Ms Kellie Armstrong (Deputy Chairperson)  
Mr Andy Allen  
Mr Stephen Dunne  
Mr Mark Durkan  
Mr Paul Frew

**Witnesses:**

Ms Martina Campbell	Department for Communities
Mr Ciarán Mee	Department for Communities

**The Chairperson (Ms P Bradley):** Members, the Committee will now continue its deliberations on this Bill. I remind you that this is not the formal clause-by-clause stage. Today, we are continuing to go through the clauses and comprehensively review with the Department any issues raised by stakeholders or Committee members. We will ask for clarification on how the Bill addresses these concerns and on any additional action that the Department intends to take on the back of the evidence that the Committee has received.

Members, you have been provided in your papers with information on this. You have a copy of the Bill, a copy of the 1985 Order, departmental replies to the Committee queries so far and the evidence summary table. As always, a Bill Clerk is following proceedings today and will be available at the end of the meeting should members wish to discuss options or if the Committee wants to table any amendments. Members, we will, hopefully, devote around two hours to deliberations now, and, if we have time and need to, we will come back to the deliberations at the end of the meeting. I remind members that questions or comments should be focused on the specific clause under discussion. Are members in agreement to proceed?

*Members indicated assent.*

I welcome Ciarán Mee and Martina Campbell to the meeting.

**Ms Martina Campbell (Department for Communities):** Good morning, Chair.

**The Chairperson (Ms P Bradley):** It is good to have you here with us again.

**Mr Ciarán Mee (Department for Communities):** Good morning. Thank you.

**The Chairperson (Ms P Bradley):** I will start with clause 1, "Interpretation". Members, no queries have been raised on this to date. Do members have any comments on clause 1? There are no comments on clause 1.

We move to clause 2, "Opening of licensed offices on Sunday and Good Friday". At the meeting on Tuesday, the officials went through the response to the Committee queries to date. Members seemed content with the responses, and no further queries were raised. Again, members, have you any further comments that you wish to make on Sunday and Good Friday?

**Mr Dunne:** I would like to register a few concerns about clause 2, particularly around the theme of not taking on board public health advice. From the past two years of the ongoing pandemic, we have seen that that would be quite a dangerous road to go down. It is noteworthy that the Institute of Public Health's written evidence highlighted the health element to this. I would like to register those concerns as well as the feedback from Gambling with Lives, GamCare, the all-party group on reducing harm related to gambling and other charities. Here in my office, I recently spoke to an employee of a well-known bookmaker in north Down, and he raised a query with me about Sunday opening and so on. He was coming at it from the point of view of family life, and he was very much opposed to further opening hours. It was not for any moral reasons or any other reason like that but purely because he wanted to spend time with his family. I just wanted to register those concerns. I am certainly not comfortable with clause 2 as it stands.

**The Chairperson (Ms P Bradley):** Thanks, Stephen. We will register those concerns.

**Mr Frew:** As Stephen said, we received evidence from the Institute of Public Health. I will just add that we also received evidence from the Public Health Agency (PHA), which also set out its concerns around clause 2.

**The Chairperson (Ms P Bradley):** Do any other members have comments on that?

**Mr Durkan:** While we are not being disrespectful about or disregarding the named agencies' concerns around Sunday opening, if we were to ask them for an opinion, they would say, "Close bookmakers altogether. Close bars altogether". That is their view. We are right to acknowledge it, but we cannot make policy that is based purely on the view of such agencies.

**The Chairperson (Ms P Bradley):** Thank you for that, Mark. It was also interesting to hear from young people last night, albeit a small sample. The majority asked why we needed to extend the hours, given the incidence of problem gambling in Northern Ireland. Ciarán or Martina, do you want to comment on clause 2?

**Ms Campbell:** We note the comments from the various agencies. As Mark said, they sometimes come from a very risk-averse position. It is important to remember that the majority of people who gamble do so responsibly and enjoy it as a form of entertainment. Also, I think that it was Paul who pointed out that it is sometimes better to keep the gambler in the one place — the bookies — where, generally, the staff will know them, look after them and help them if they think that they are developing a problem. Furthermore, such opening has not necessarily led to an increase in problem gambling in the other jurisdictions in which it has been available for many years. The issue, as we know, is that online gambling is available 24 hours a day. Stephen made a point about family life, as Paul has done a number of times. We can simply point to the protections that we are including in the Bill that extend workers' rights to not have to work on a Sunday. During the evidence sessions, we heard from the Turf Guardians' Association. It indicated that its members would be respectful of anyone who did not want to work on a Sunday, for whatever reason.

**The Chairperson (Ms P Bradley):** Thank you, Martina. Members have no further comments, so we will move on to clause 3, "Sunday working in licensed office". We have touched on it already. At the meeting on Tuesday, officials went through their responses to the Committee's queries to date. We highlighted evidence that we received that any additional opportunities for gambling had the potential to increase gambling-related harm and to impact on family life. Otherwise, no queries were raised. Members, we touched on this when we were talking about clause 2. Do members want to add anything further on clause 3? Martina, you responded to it earlier. I am happy with that, unless you want to add anything further. Sorry, Andy wants to come in.

**Mr Allen:** We have been keen on guidance when going through the Private Tenancies Bill, as we were with the Licensing and Regulations of Clubs (Amendment) Bill. Employment law is complex, so there is a need for guidance on what employment safeguards exist for those who may not wish to work on a Sunday.

**Ms Campbell:** We can take that away and look at it. It is probably for colleagues in the Department for the Economy, but we will work with them. We worked with them in getting their agreement to extend the protections for betting shop workers, so that is not a problem. We can do that.

**The Chairperson (Ms P Bradley):** If members agree, we will move on to clause 4, "Pool betting". To date, no issues or queries have been raised on that. Do members have comments on pool betting? Members have no comments. Martina, do you have any comments, or may I move on?

**Ms Campbell:** You can move on.

**The Chairperson (Ms P Bradley):** Again, we raised no queries on clause 5, "Persons who may participate in bingo at bingo club". Do members wish to comment on clause 5? No members have comments. Martina, have you anything to add, or are you happy to move on?

**Ms Campbell:** I am happy to move on.

**The Chairperson (Ms P Bradley):** Good stuff. We will move on to clause 6, which is "Days when bingo and use of gaming machines permitted on bingo club premises".

At the meeting on Tuesday, officials went through their responses to the Committee's queries to date and highlighted that they have had — sorry, I have no glasses with me today — that they had expected to have returns from the Northern Ireland Courts and Tribunals Service but that they had not yet been received. Officials confirmed that they were working with the courts to get the information and would continue to do so. A member queried the PSNI's powers on illegal gaming machines in, for example, fast-food outlets. Officials said that there were sufficient powers for the PSNI and highlighted a number of offences, one being the offence by the outlet owner of having the machine and a second being the offence by the supplier of supplying the machine. The member then suggested that the issue may lie with the PSNI's awareness and/or use of its powers.

After the meeting on Tuesday, we wrote to the Department requesting the returns from the Courts and Tribunals Service and further information on how the Department will work with that service on data gathering, how it intends to highlight to the PSNI its powers in that regard and how the PSNI is using them.

Martina, do you want to inform us of anything further? Is there any more information?

**Ms Campbell:** Yes, Chair. We sent through some information, but it may not have reached you yet. We provided the response that we have received from the Courts Service so far. Obviously, it is not the final version; we will send that when all the returns are in. As I said, the Courts Service has confirmed that it is willing to work with us to see what more information it can provide. One piece of information that the Courts Service does not seem to collect but might be able to collect is its specification, when it issues the licence, of the number of gaming machines permitted. It would not be very onerous for it to collate that information. There is no need to amend any clauses or insert additional ones to allow us to do that.

On illegal gaming machines in fast-food outlets, Mark Durkan had asked whether the police were aware of and used their powers. We contacted our gambling contact in the PSNI, and he confirmed that the police do not routinely check for that type of offence. That said, if anyone is aware of gaming machines being used in premises where they are not permitted, they should report that to the police.

From a Google search, we came up with three different examples of targeted operations undertaken by the police on takeaway and fast-food outlets. We provided links to those in our written response. That is it, Chair.

**The Chairperson (Ms P Bradley):** That is great. Thank you, Martina.

**The Committee Clerk:** Chair, that written response is not with us yet. It is probably in the system somewhere.

**The Chairperson (Ms P Bradley):** Martina, the response is not with us yet.

**Ms Campbell:** Yes. Sorry. I said that. It is on its way.

**The Chairperson (Ms P Bradley):** Grand. OK, Martina. Thank you.

Members, do you have any comments or queries? Are we happy to move on? Paul?

**Mr Frew:** I will just say that, by extension, I have the same concerns on clause 6 as I have on clause 2, albeit I know that bingo is much more of a social event with much smaller stakes and that it is formatted in such a way that it is more of a communal game. Betting on bingo has a different nature from betting in a bookie's; there is no doubt about that. Again, however, clause 6 provides more access, so, while I am not as concerned about it as I am about clause 2, my concern is still there.

**The Chairperson (Ms P Bradley):** OK. Thanks, Paul. Are there any further comments on clause 6 at this stage? Nobody is indicating, so I will move on to clause 7, which is "Offence of inviting, etc. Person under 18 to play gaming machine". At the meeting on Tuesday, officials went through the responses to the Committee's queries to date. Officials highlighted the differences in gaming machines, in that those based on skill rather than chance are not covered in the 1985 Order. It is hoped that, in the future, those older machines will be brought into law.

A member requested further clarification on the law on fixed-odds betting terminals (FOBTs). Officials clarified that and highlighted to the Committee that they had hoped to include FOBTs in the Bill but were advised against doing so by the Office of the Legislative Counsel (OLC). They highlighted that FOBTs will be dealt with in the second phase of reforms. A member queried whether anything could be done in the code of practice. Officials confirmed that, in the meantime, FOBTs are covered in the draft code of practice.

After the meeting on Tuesday, we wrote to the Department again on the following issues. We requested confirmation on the future plans for legislating on older skill-based gaming machines. We requested written confirmation that FOBTs will be dealt with in the phase 2 reforms and, for now, included in the code of practice. We acknowledged that there are venues that adequately display notices regarding the age suitability of machines, but we supported amending the code of practice to require notices to be displayed on the gaming machines or, if that is not possible, as close to the machine as possible.

Martina, do you have any further information on that?

**Ms Campbell:** Yes, Chair. The Department confirmed that, subject to the views of the incoming Minister and Executive, the proposed phase 2 reforms will include a completely new Act, which will take account of any proposals arising in other jurisdictions and any reviews, such as the review of the Gambling Act 2005 in England and the ongoing work in the South to introduce a gambling regulator and further reform its gambling regulation. As the Minister stated during the Second Stage debate, the scale of reform that is needed here is enormous and cannot be overestimated. The current Gambling Act in Britain has 365 clauses, and even that legislation is considered to be vastly out of date.

Subject to the caveat that there will be an incoming Minister and Executive, we anticipate that we will bring forward the single biggest piece of legislation that the Assembly has dealt with since its inception. You guys are lucky to be on the Committee. In bringing forward that legislation in phase 2, the policy intention is that we will make provision for all types of gaming machines, including fixed-odds betting terminals. That will make it clear which machines are permitted, where they are permitted, how many are permitted and in which location or premises.

FOBTs are classified as B3 machines in Britain. I have sent through the tables that I referred to with the list of different machines, stakes and prizes. As I said on Tuesday, there are about eight or nine different categories of machines in England. I hope that that addresses the points raised by Paul about gaming machines being treated differently here. FOBTs are mentioned in the draft code of practice, on page 28 in the section on gaming machines. We will consider whether there are any additional measures that we can include in the code on FOBTs, taking into account any points raised by the Committee.

The Committee will also wish to note that legal advice continues to support our view that FOBTs are, for the purposes of the 1985 Order, gaming machines, and they are, therefore, covered by the Order. Ultimately, of course, it would be for the courts to confirm that understanding. It should be noted that, as the Chair pointed out, most gaming machines, particularly newer machines, already carry age limit notices. Indeed, pop-ups built into the machine software invite the player to set time limits and spending limits. Those pop-ups appear as soon as a player turns the machine on and at regular intervals thereafter.

Machines such as grab machines are based on skill and are therefore not currently covered by the 1985 Order. It would be difficult to include those machines in the 1985 Order as they are not recognised as gambling machines; they are about testing skill. Subject to the views of an incoming Minister and Executive, we could, however, include in phase 2 proposals to bring those machines firmly within the remit of the new legislation.

Finally, Chair, we confirm that the code of practice will be amended to include a requirement for a notice to be displayed on the actual gaming machine, if possible. If that is not possible, owing to the design of the machine, it should be displayed as close as possible to the machine, where it is visible to the user. That is it, Chair.

**The Chairperson (Ms P Bradley):** Thank you, Martina. Last night, we had an event with young people. At least one of them said that he and his friends went into an over-18s gaming facility and were not stopped or asked for ID. They were able and free to go and play the machines. They felt that they were not being stopped. Young people are quite free to do that. We need to look at addressing that, whether by requiring that people are asked for ID or whatever the case may be. The young people also said that having signage on machines would be a good idea as, quite often, there is only a very small sticker on the corner somewhere that says "You must be over 18 to play this machine". If, at the moment, young people can freely walk in and out of establishments for over-18s, we have a problem.

**Ms Campbell:** Sorry to interrupt you, Chair. Any responsible gaming arcade owners, particularly if they are members of the Northern Ireland Amusement Caterers Trade Association (NIACTA), will abide by a code in relation to over-18s and have signage on the door, both at the entrance and just inside. Ciarán can talk about that later. The code of practice also has a section on age verification. We encourage owners to use the Think 21 principle, and we have used the same list of IDs for verifying age as is used for liquor licensing.

I hope that that answers your query, but I take on board your point that there is a massive issue around enforcement. Hopefully, in phase 2 of the reforms, if we ever get to that stage, if we have our own regulator or access to a regulator, we will then have our own enforcement officers, which would lead to more robust management of the legislation.

**The Chairperson (Ms P Bradley):** That is grand, Martina. Does anybody want to make any comments about clause 7?

**Mr Frew:** There are two aspects to the point that Martina just made. When young people enter such premises, in most cases, areas will be split: one area with gaming machines for all ages; another area for over-18s. In some places, there is another room or a segregated part, which means that you have to walk up an alleyway or through an archway, and that is almost an obvious barrier between the machines that are for everybody and the machines for adults, if you like. Sometimes, even the lighting is different between the two areas.

This is about the preventative piece and having this warning. At the moment, the Government are into nudge philosophies when it comes to public health. We are applying the law by putting responsibility on owners to police their premises, and that is correct. Remember, though, that an employee may know these young people very well, and there may be pressure to allow them in. Sometimes, if an under-18 knows that they should not be in a place, there is a question mark and a pause before they go in — "Should I be in there? Will I get told off? Yes, I will". It is blatantly obvious because yellow and black tape warns them not to enter. I am not suggesting for one moment that it should be in the Bill, but there should be something in the code of practice to ensure that young people know full well that they should not be in that space. Whether that is signage on a machine, signage in a room, a plaque on a wall or warning tape around an archway, we need to look at that. As we have seen over the past two years, nudge signage and imagery to prevent certain behaviour is very powerful.

**Ms Campbell:** There is already a requirement in legislation to have physical separation of machines for over-18s from those that are available for under-18s. That is already in the law. In clause 7, we have the new offence of inviting, causing or permitting an underage person to play machines. Hopefully, that will be an additional deterrent.

Ciarán will talk you through the code of practice. In that, we suggest that signage should be A5, which is the size of a small notebook. It is a lot bigger than a tiny sticker.

The Department also produces a leaflet on gaming machines, and we will review all our leaflets once the Bill goes through. We can look at whether we can make that a bit stronger in some areas.

**Mr Mee:** May I add something to what Martina said? Paul, I take on board your points, and we can look again at the section of the code dealing with the protection of children and young people. The code of practice also says that the notices should not just say "No Under-18s"; they should make clear that causing or permitting an underage person to gamble on anything other than a lower limit gaming machine is an offence. People will have clear knowledge of that and will see that it is illegal.

**Mr Frew:** Yes, that is important.

**Ms Campbell:** One final point on staff training occurs to me. NIACTA and the Turf Guardians' Association told us and, I think, the Committee that they frequently send their staff on various training courses related to underage limits, how to recognise someone who is underage and how to discreetly handle that. A bit in the code covers staff training, but I accept the point that, sometimes, when it is somebody's mate, it could be difficult for the staff member.

**Mr Durkan:** Ciarán stole my thunder there. I was going to make the suggestion that any advisory notices or warnings not only say what is not allowed but spell out the consequences of allowing it.

I have a more general point. It does not relate to this specific clause but to something that Martina said during the discussion. She expressed her hope that something might be done in the next part of the legislation in the next mandate. That has been mentioned a couple of times. It is no criticism of the officials, but Martina's actual words were, "if we ever get to that stage". That gives me great cause for concern, to be quite frank. I know that you do not know who your Minister will be or what their intention will be around this issue. We were being told that a lot of the stuff that is not in the Bill will be coming. Now, it sounds more like we are being told that it might come. I have been open about clauses 2 and 6, which deal with Sunday opening. I can see how those who are opposed to or concerned about those relaxations will be particularly concerned about the absence of a lot of the protections that now might come in the second part of the legislation.

**Ms Campbell:** Chair, I apologise for my poor choice of wording. The Minister is —

**Mr Durkan:** It is accurate wording.

**Ms Campbell:** I cannot pre-empt what an incoming Minister or Executive might do. As a long-standing civil servant, I am used to getting kickbacks sometimes. We have been waiting for a long time to get the Bill through. The Minister is clear and on record saying that she wants a two-phased approach. The second phase will be a major piece of work that will bring us up to date, cover online issues and pick up all those issues that members, the public and other stakeholders have repeatedly raised. Until something happens, I will remain a bit of a pessimist; I am always a glass half-empty person. All that I can say is that the Minister is very clear that she wants phase 2 to happen, but, as always, we are subject to the view of an incoming Minister and Executive. I apologise if I have been —

**Mr Durkan:** Do not apologise for being pessimistic. My name, Durkan, derives from the Gaelic word for pessimist. *[Laughter.]*

**Ms Campbell:** I should change my name to Durkan, because that is me.

**Mr Frew:** Martina, this place does that to you. Do not worry.

**The Chairperson (Ms P Bradley):** Mark, do you have anything further to add or comment on?

**Mr Durkan:** No. That is fine, Chair. I am not criticising the officials at all. I do not think that they are being pessimistic; they are being realistic, but we have to be realistic as well.

**The Chairperson (Ms P Bradley):** Thank you. If members do not have anything further that they want to say on clause 7, we will move on to clause 8.

We can take clauses 8, 11 and the schedule together, as our discussions to date have dealt with them together. Clause 8 is "Arrangements not requiring persons to pay to participate" and clause 11 is "Prize competitions not requiring persons to pay to participate". We also have the schedule.

At the meeting on Tuesday, the officials went through the responses to the Committee's queries to date. Our discussions on Tuesday centred on the two key issues, which are promotional prize draws and prize competitions; and the need for the Bill to be clear that companies can include residents from Northern Ireland in such draws and competitions. Officials advised the Committee that the clarification of the wording in the clauses was not needed as the information in proposed new schedule 15A should make the law clear. The Committee accepted the officials' explanation from a legal perspective but queried whether a further simpler explanation could be put into the explanatory and financial memorandum (EFM).

After the meeting on Tuesday, we wrote to the Department on the following issues. We requested written confirmation that the EFM will be amended in order to explain, in layman's terms, what clauses 8, 11 and proposed new schedule 15A will do to further remove any impediments to such competitions and draws being open to Northern Ireland customers. The EFM should also include clear examples, and the Committee requested sight of the amended EFM as soon as it is available. Martina, do you have any comments on that?

**Ms Campbell:** Yes. The amended EFM with tracked changes is on its way to you, and we hope that it meets the Committee's requirements. Also, as I mentioned, we have a number of information leaflets, and they will all have to be reviewed when the Bill becomes law. Taking on board what the Committee has said, we have decided to draft an additional leaflet covering prize draws. We will be a lot freer in that leaflet to set out examples. We can even name the Halifax, Nationwide and other bank and building societies. That leaflet will include worked examples. We will also give an example about prize crosswords, because bank savings and crosswords are the two most complained-about issues in this area. I hope that that provides some assurance to the Committee.

**The Chairperson (Ms P Bradley):** Thanks, Martina.

**Mr Frew:** Sorry if I picked that up wrongly. Maybe I missed the first bit, Martina. I am supportive of an additional leaflet, but am I right to say that that will not negate my request on the amendment to the EFM?

**Ms Campbell:** No, it is in addition to that. We have amended the EFM, but I stress that the version that you got is not the final version. We did it at breakneck speed in order to get it through to you, and I have noticed areas where we could maybe do it a little bit better. We will do a further version and get it through to you for Tuesday's meeting. We are going to do what we can in the EFM and an additional leaflet, which will be a lot more detailed than the EFM can be.

**Mr Frew:** I understand, and I support the leaflet. Just to let you know, we cannot judge your wording because we have not seen the new text for the EFM yet.

**Ms Campbell:** I appreciate that, and I apologise that you did not get it.

**Mr Mee:** Paul, it is on its way through to you. Roughly, what you will see is that we have put an additional sentence on the end of the explanations for clauses 8 and 11. We then have a separate section at the end on proposed new schedule 15A that tries to explain the intention behind that schedule. There are some very general examples, and they are maybe not worked, but we explain what we mean by prize competitions, bank and building society accounts, newspapers and those types of things. Hopefully, that will land with you today or tomorrow at the latest, but it is on its way.

**Mr Frew:** I do not mean for anyone to name companies, banks or building societies —

**Mr Mee:** No.

**Mr Frew:** — but it should be clear that that is exactly what we are talking about, if that is in order.

**The Chairperson (Ms P Bradley):** If there are no other comments on clauses 8 and 11 and the proposed new schedule, we will move on to clause 9, "Rules for societies' lotteries".

At the meeting on Tuesday, the officials went through the responses to the Committee queries to date. We noted that the Department would forward the regulations concerning the uplift in the maximum prize limit as soon as they were available. We wrote after the meeting requesting sight of the draft regulations or at least a written explanation of the detail by Monday at the latest in time for consideration at our meeting of 25 January.

On Tuesday, a member queried whether there was any issue regarding island-wide society lotteries. The officials stated that there were no issues regarding anyone buying a ticket but that there could be a problem with such a lottery being promoted in Northern Ireland. We wrote requesting that the Department provide a response to that query.

Regarding ticket prices, officials advised that a new limit needs to be in the primary legislation, and they confirmed that they would issue drafting instructions to the OLC to proceed with an amendment. We requested sight of that draft amendment, also by Monday.

Martina, is there any further information on those matters?

**Ms Campbell:** Yes, Chair. We confirmed that we will provide either a draft of the regulations or a written briefing of the detail that is to be covered in the regulations under separate cover by Monday. The regulations are still very much in draft, and they have not been cleared by the Departmental Solicitor's Office (DSO).

I will turn to societies' lotteries. On the trans-frontier issue, which Mark raised, we point to article 135(1) of the 1985 Order, which states:

*"Subject to the provisions of this Order, a society's lottery is not unlawful if—*  
*(a)it is promoted in Northern Ireland; and*  
*(b)the society is registered under Article 136; and*  
*(c)it is promoted in accordance with a lottery scheme approved by the registered society."*

That means that lotteries such as those that are promoted by many sports clubs on an all-island basis are illegal unless the lottery is also registered with a district council here, as required under article 136 of the 1985 Order.

What type of organisation qualifies as a society? We set out in our response the definitions of a society and of a society's lottery, as detailed in article 2(2) of the Order. One of the other queries that we noted as outstanding from last week was whether a political party could constitute a society. A political party may well satisfy the definition of a society, as set out in article 2(2) of the Order, but it would be for a court to give a definitive view.

A couple of meetings ago, Kellie asked whether an organisation has to be registered as a charity. We confirmed that an organisation does not have to be registered as a charity as long as it fits the definition of a society and the lottery satisfies the definition of a society's lottery, as set out in article 2(2) of the 1985 Order.

On ticket prices, we confirmed that we have issued a set of instructions to OLC requesting an amendment to the maximum ticket price. You will recall that there was some debate about what that price should be, so the Minister has set it at £100. The Minister also identified a potential unintended consequence in relation to that issue; namely, that some societies might seek to abuse, for want of a better word, the facility and run multiple draws at £100 a ticket, which would be more often than the policy intention of once or twice per annum.

Whilst various organisations that spoke in support of removing the ticket price limit stated that the charities and societies know their audience and know what is feasible or reasonable for the ticket price, the Minister believes that it may be prudent to include a regulation-making power in the Bill that would give the Department some flexibility to amend the rules for societies' lotteries. The Minister intends to take a power to amend article 137(4) of the 1985 Order, which would make it clear that the Department could make regulations that could apply different frequencies, according to the level of

ticket price. Instructions to counsel to that effect have been issued, so those discussions with counsel are ongoing. We expect and hope to be in a position to provide a copy of the draft amendments on Monday.

With your permission, Chair, I will talk through what we mean by "unintended consequences". We know that a lot of clubs, such as football clubs, for example, run draws every month and that people pay them off at £10 a month or whatever. That is perfectly acceptable under the new rules. However, those clubs may also run a weekly lotto for £1 a week, because the current maximum ticket price is £1. We do not want those clubs to abandon on a regular basis the grunt work, if you like, of fundraising and opt to have five or six draws a year where they sell the ticket at £100. Some of the areas where the clubs are based are deprived, and, naturally, people want to support the club because they have a great affiliation with it. We do not want people to feel under pressure to buy those tickets on what is near enough a weekly basis. That is why the Minister would like to have the power to introduce some flexibility in the frequency and to vary the price, but we are not sure if that is possible; we are still exploring that. I hope that that explains the position, Chair.

**The Chairperson (Ms P Bradley):** Does any member want to comment on that?

**Mr Allen:** Would that regulation be done through affirmative or negative resolution?

**Ms Campbell:** Affirmative.

**Mr Frew:** You talked about your deliberations on finding the unintended consequences. They are real, and I recognised that as soon as you said it. Are you minded in any way to think about how frequently those draws should happen? I guess that it is different in different areas for different populations, so I can see the difficulty and why it is best to go for enabling legislation at this stage. Has the Department any detail on its thought processes about frequency?

**Ms Campbell:** No. Our thinking is that selling tickets at £100 a go would be the exception rather than the rule. Obviously, we would have to consult on the regulations and, based on that, the views that are expressed. The incoming Minister would then take a view on how often we need to limit the frequency of the draws, whether we need to limit it or whether we need to vary it. There is a power in article 137(4) of the 1985 Order that allows us to vary the frequency of the draws, but we have never used it. We do not have the power to vary the ticket price limit. We need to have further discussions with councils on whether that is possible. If we say that you can sell tickets only twice a year at £100, or four times a year, we do not want a situation where people try to get round the law by selling tickets at £99. It needs a bit more thought. That is why we think it is more straightforward if it is done by regulation. Obviously, that would allow us to respond quicker if issues were identified in the future, rather than having to go through primary legislation.

**Mr Frew:** On your existing power, article 137(4) of the 1985 Order states:

*"The Department may, by order subject to affirmative resolution, specify—*

*(a) the maximum number of lotteries that may be promoted on behalf of the same society in any year; and*

*(b) the minimum number of days that must elapse between the dates of any two lotteries promoted on behalf of the same society."*

That gives you the power to sort out the frequency. Is that law for individual societies on case-by-case situations, or is it a general power?

**Ms Campbell:** That is a general power, but, as I have said, we have never used it. I cannot remember when it was changed. It might have been in 1996.

**Mr Mee:** It was in 1994, Martina.

**Ms Campbell:** Obviously, it was changed due to some issue that Ministers of that time had become aware of. To answer your question, I will say that it would not be possible to legislate for and name specific organisations or anything like that. It could be possible for us to put that in the guidance. We have a guidance leaflet on societies' lotteries. Maybe it would be best served there and, in conjunction

with the council, we monitor how the rules are operating in practice. As I have said before, good practice dictates that you evaluate your policy maybe three to five years after its implementation. We are still trying to figure this out because we are working at such speed at the minute.

**Mr Frew:** I am not sure what the ill is — whether it is the price ticket at £100 or the fact that you have to buy a ticket every so often. One suggestion — I am not holding you to this or trying to trap you — is that you have a sliding scale because £100 is a limit; it is not a target.

**Ms Campbell:** Absolutely. You hit it there.

**Mr Frew:** Again, in some areas, £75 per ticket is still going to be a lot of money if you are paying it weekly. I am looking for a logical way that will make it fair across the board. The only thing that I can come up with, with my primitive thinking, is a sliding scale whereby the cost of the ticket prohibits you having so many draws a year, if you know what I mean.

**Ms Campbell:** Yes. I know what you mean; indeed. We are trying to work it out by going through different permutations. There will be some natural controls, for want of a better term, that will prevent a society running those tickets, not least the fact that people would soon get fed up buying £100 tickets every week and the limits that we are going to have in whole proceeds. That might naturally give a kind of cut-off, but we are still trying to work through whether that satisfies the policy intention. We do not want people to be bombarded with tickets at that price too often, but what "too often" means needs further thought. The only way that we could bottom that out is by having some sort of consultation on a draft set of regulations in the future.

**Mr Frew:** OK. Thank you.

**The Chairperson (Ms P Bradley):** Has anyone else any comments or queries on clause 9?

**Ms Armstrong:** Can I just double-check something? If a club or society, for instance, decides to do a competition twice a year where it is £100 for a ticket, that is within the scope. What happens if that club or society engages an external body to run those types of events for them? If a PR company or a private company comes in and runs the event and decides that its members or workforce will contribute towards a group, is that still covered under this scope because the club or society is the beneficiary?

**Ms Campbell:** Yes, it will be. There are existing rules for lottery managers or consultants. The society still has to abide by the rules regardless of whether it runs it or it is through a consultancy or a fundraising firm.

**Ms Armstrong:** Excellent. Thank you very much.

**The Chairperson (Ms P Bradley):** OK. No other member has indicated that they want to say anything further in clause 9, so we will move to clause 10, "Qualifications by age, residence or corporate status for licences, certificates and permits". Members, no queries have been raised on clause 10. If there are no comments at this stage, I will move on to clause 12, "Cheating".

At the meeting on Tuesday, the officials went through their responses to the Committee queries to date. No further queries have been raised on the issue. If there are no further queries on clause 12, I will move on to clause 13, "Enforceability of gambling contracts". We have raised no queries on that. Unless members want to raise anything on clause 13, I will move on to clause 14, "Industry levy".

At the meeting on Tuesday, the officials went through the responses to the Committee queries to date. They highlighted difficulties in getting cooperation from HMRC in gaining access to data on gambling expenditure, gross gambling yield etc and said that the matter would continue to be pushed by the Minister, as a future regulator would need that type of data. Members highlighted concerns about proposed new article 172A(3)(d) and being sure that transfers of the levy to other Departments are spent appropriately. Officials stated that that would be something that a regulator could consider in the future. Members queried whether there is a way to set something in stone in the Bill and gave the example of the carrier bag levy.

After the meeting on Tuesday, we wrote to request that the Department respond on how the use of the levy money could be more pinned down in the Bill and on whether a change of the wording to

"gambling-related harm" would be included, as suggested by officials. The Committee also requires sight as soon as possible of the amendment that expands the requirement to consult, as proposed by the Committee and accepted by the Minister. Again, Martina, is there anything further on that?

**Ms Campbell:** On the regulator data collection, we clarify that any decision by an incoming Minister or Executive to appoint a regulator would require primary legislation, and that is planned as part of the phase 2 reforms. Such legislation would consider, as I outlined when we talked about clause 7, any policy proposals from other jurisdictions, and it would take account of best practice internationally. It is envisaged that, if a regulator were to be appointed, an entirely new and robust regulatory framework would be built around the role and remit of the regulator. We have considered whether it is possible to add an enabling power into the existing Order, but it is not. Issues such as powers of investigation, for example, would have to be fully explored and included in primary legislation in the future.

As I mentioned, if we had a regulator that was equipped with all the necessary powers, similar to the powers of the Gambling Commission, that regulator could require data. All that data would then be at its disposal, and we might not necessarily need the HMRC data. On accessing HMRC data, we still think that we need to have discussions with that body about some sort of data sharing, as the Assembly has no powers to compel HMRC to give data to us.

On levy proceeds, the Minister has accepted the Committee's request to expand the list of consultees that are listed in proposed new article 172A(2). Instructions have issued to OLC, and we expect to be able to provide the Committee with that revised amendment by Monday.

I will move on to the point about how the use of the levy money could be more pinned down in the Bill and whether the change of wording to "gambling-related harm" should be included. After reviewing the section and leaving aside the point about pinning down the spending, the wording in proposed new article 172A(4)(b) is sufficiently broad, we feel, to meet the policy intention of using the proceeds to fund education, research and treatment. The Department will clarify that the reference to perhaps changing the wording in that article — I mean specifically "addiction to gambling" — was in response to comments from some witnesses. Having reviewed the instructions to counsel and having had conversations, however, we believe that both terms used in proposed new article 172A(4) under clause 14, which are:

*" (a) addiction to gambling; or*

*(b) other forms of harm or exploitation associated with gambling",*

cover all forms of gambling harm, whether that be the harm suffered by the individual, their family or broader society. "Broader society" includes education and perhaps the criminal justice field, because of potential crimes committed as a result of a gambling addiction. The wording therefore does not need to be amended in proposed new paragraph (4)(a).

I reiterate that the proposed regulations to be made in connection with the levy will be fully consulted on. The regulations referred to in proposed new article 172A(3) are the regulations that will:

*"make provision for the amount of the levy, its payment and general administration and may, in particular— ...*

*(d) make such modifications of this Order as are necessary or expedient to give full effect to the levy."*

In practice, the regulations could state that the Department appoint an administrator — for example, an intermediary funding body — to administer the funding on its behalf. The discussion on Tuesday was about whether Departments would spend the money appropriately. The difficulty with specifying a body — for example, the Public Health Agency — is that its vires would not cover spending outside its ambit. The Public Health Agency could not therefore provide funding to, for example, education projects.

You asked about pinning down the spending, Chair. We looked quickly, as Mark had suggested that we do, at the wording in the Single Use Carrier Bags Charge Regulations (Northern Ireland) 2013. We could not find any reference in them, so we looked at the parent Act, the Climate Change Act 2008, which is a UK-wide Act. The Act gives DAERA the power to make the regulations, which it has through the Single Use Carrier Bags Charge (Amendment) Regulations (Northern Ireland) 2021.

Again, we could not find any legislative provisions for expenditure of the moneys, but I emphasise that it was a very quick look. We note that the power in the Climate Change Act includes provision for DAERA to appoint an administrator. We have given the Committee an extract from section 77 of 2008 Act, which related to schedule 6 to the Act. After considering that, we believe that the provision included in proposed new article 172A(3) has the same effect as that set out in the Climate Change Act. The wording in the Bill states:

*"Regulations under paragraph (1) must make provision for the amount of the levy, its payment and general administration".*

We think that that wording achieves the same effect as that to which the member alluded.

The amendment that the Minister has accepted is about the list of consultees proposed at new article 172A(6). We have asked counsel to expand the list of consultees contained in new paragraph (6) to include organisations that represent health or social problems related to gambling harm and any other relevant organisation that appears to the Department to represent the interest of those impacted on by gambling harm. We hope that that provides sufficient assurance to the Committee that there will be consultation with relevant organisations and that any proceeds from the levy will be expended properly and for the benefit of those individuals who are suffering, or are at risk of suffering, gambling-related harm.

Finally, as was explained on Tuesday, discussions will have to be held with DOF about the proposed levy. Normal practice dictates that the introduction of such a levy include a business case, which will be placed on the Department's website when approved. The business case will set out all the details, including how the payment is to be collected, and how the proceeds, less any administrative charges, particularly if a third party is to be involved in administering the fund, will be treated and spent. We accept the point made about the need to ensure that the parameters of such provisions in primary legislation are sound enough, but we consider the clause as drafted to meet the policy objectives of the ability to impose a levy, the proceeds of which will be used to fund education, treatment and research.

**The Chairperson (Ms P Bradley):** Thank you for all that detail, Martina. Do members have any comment, or is there anything further that they want to ask about clause 14 and the industry levy?

**Mr Frew:** Are you content with the wording of proposed new article 172A(4)(a) and (b)? Do we need to add the last few words that you used, which were "education" and "health"? Proposed new article 172A(4) reads:

*"(a) addiction to gambling; or*

*(b) other forms of harm or exploitation associated with gambling."*

We are talking about what the proceeds of the levy are to be spent on. Should there be an amendment made to add "education"? You named another two, Martina, but I have forgotten them. Your last sentence specified three things.

**Ms Campbell:** Yes.

**Mr Frew:** Education, health —

**Ms Campbell:** Education, treatment and research.

**Mr Frew:** Right. Those three. Should there be an amendment made to add those three aspects?

**Ms Campbell:** We will discuss that with counsel, but, when we were drafting the instructions, that was the policy intention, and that was the wording that counsel came up with. The feeling was that proposed new article 172A(4)(b) covered education, treatment and research, but we will certainly go back to counsel and ask that question. There is no issue with our doing that.

**Mr Frew:** Give me those three again. Was it education, research and addiction?

**Ms Armstrong:** Treatment.

**Ms Campbell:** Treatment.

**Mr Frew:** Sorry. Thank you very much.

**Ms Armstrong:** You talked about the administration fee. We know that, in the community and voluntary sector, the normal fee is 15% of the cost. Does that mean that 15% will be the level of admin that is limited with any external body?

**Ms Campbell:** Sorry, but do you mean that 15% is the limit?

**Ms Armstrong:** In the community and voluntary sector, the agreement in the past was that administration costs should not be any more than 15%.

**Ms Campbell:** Yes. I get you. We have not done any thinking around that, Kellie. At this stage, it is all part and parcel of the consultation. When the regulations are drafted, they will go out to consultation. If there is a particular convention in the voluntary sector that the administration cap is 15%, and if that were still valid when we are doing the regulations, I imagine that we would impose that limit.

**Ms Armstrong:** Brilliant. Thank you.

**The Chairperson (Ms P Bradley):** We will move on to clause 15, which is the code of practice. Members, at Tuesday's meeting, we highlighted concerns that were expressed by Drumbo Park and NIACTA. Officials went through the draft code of practice in more detail with the Committee and highlighted the range of codes that they had used to draw up the current draft. They confirmed that, in the first instance, it is a six-week focused consultation and that, after that, a further consultation will be conducted on the final code of practice, as per proposed new article 180A(10). After the meeting, we wrote requesting confirmation that the range of issues on which members expressed concern, including affordability checks, spending limits and self-exclusion, will be considered in further detail and be based on responses to the current and the next consultation. Martina, do you have any further information yet?

**Ms Campbell:** Yes, Chair. The Department accepted that such concepts as affordability checks contained in the draft code may need further development but emphasised that it needed to hear the concerns of the industry and other stakeholders about how any such proposal might work in practical terms before the Minister could come to any final decision. The final decision will, we believe, rest with an incoming Minister in the new mandate, given the processes that we have to go through. The Department draws the Committee's attention to clause 16(3), which requires the Department to have in place a commencement order for this provision prior to issuing any code of practice in final form. The Department confirms that it will conduct a much longer consultation on a revised code of practice, subject to the views of an incoming Minister. For the Committee's information and for the sake of clarity, we have included in the papers on their way to you a copy of the consultee list that we used to seek views on the draft code. The Committee will therefore see that we included quite a broad range of stakeholders.

**Mr Frew:** To be clear, are you saying that clause 15 will be taken out of clause 16(3)?

**Ms Campbell:** No. We are saying that, at the minute, we do not have a power to introduce a code of practice, so, even when the Bill is given Royal Assent, we do not have a power to issue a code of practice until such a time as the power is commenced. We are saying that there is a process to go through.

**Mr Frew:** There are two steps to it.

**Ms Campbell:** Yes.

**Mr Frew:** If you commence clause 15 on a day that the Department for Communities "may by order appoint", what you are really doing is allowing for a code of practice.

**Ms Campbell:** Yes.

**Mr Mee:** Paul, we are more than allowing it, because, if you look at the terms of the Bill, you will see that, at that point, the Department must issue one or more codes of practice. We are obliged by law to introduce at least one code of practice.

**Mr Frew:** Yes, I get that. Proposed new article 180A(1) states:

*"The Department must issue one or more codes of practice about the manner in which facilities for gambling are provided".*

With that "must" being there, does that put a timescale on it? It is in your gift to commence, so you will not want to commence without your being in position —

**Mr Mee:** To issue at least one.

**Mr Frew:** OK.

**Mr Mee:** Hence the reason that we are doing all this now, Paul. As I said, the codes as you see them are on a number of themes and contain sections such as protection of children and young people, customer care, and credit and securities. We will therefore have to issue at least one, and our present thinking on that is what you see in the draft form.

**Mr Frew:** There is no reason to suggest that every section in that draft code of practice could not be an individual code of practice.

**Mr Mee:** Yes. It is "one or more codes". That is why the draft code is designed in the way in which it is. To be honest, Paul, while we will wait to hear what stakeholders say, there are certain elements of it, such as credit cards, with which we are fairly comfortable. There may be other elements that need more work. Ideally, we will want to have something ready. That is why we feel that is very important to start the consultation process now and get drafts out.

**Mr Frew:** It is important to have that agility and flexibility, but, in truth, out of all the sections in the draft code of practice, you could pick one and commence it, and then do nothing on the rest of them. I am not saying that you would do that, but that is the reality.

**Mr Mee:** Yes, it is, but, in a lot of this, there are areas in which it is clear that we need to be able to regulate, and a lot of the code of practice also has to be seen as a tool for good practice for other agencies and, in a sense, for the industry itself. We expect that, as it becomes more public, there will be more discussion about what we should have in a code of practice and whether we should do "this" to deal with "that" aspect. Perhaps something will come out for the likes of your discussions with children and young people, Chair. All those issues then start to bubble.

**Mr Frew:** I will flip it the other way. At the minute, your sections in the draft code of practice are a list of things about which you are worried or concerned, and that is why they are in there, but there could be something that a new Minister decides is important that is not in the draft. Although it may well be important that we have codes of practice, others may argue, "Why are you even going anywhere near that? You are interfering where you shouldn't". What powers are there to prevent the Department going down that road?

**Mr Mee:** Ultimately, it is a decision for the Minister. The codes of practice themselves, Paul, are not a definitive statement of the law, which is an important point to make. Rather, they are how we interpret the intent of the law and good practice within the law. Do you get what I mean?

**Mr Frew:** Remember that codes of practice have teeth. There is an impact from them. Proposed new article 180A(8) states under clause 15 on a code of practice states:

*"A failure to comply with a provision of a code does not of itself make a person liable".*

Let me use hyperbole. If a new Minister were to say, "I do not like this operator. I do not like bookies" and then come up with some hare-brained code of practice, that could be really impactful when it comes to renewing licenses. Is there anything to protect against that?

**Mr Mee:** That is the purpose of consultation. A code of practice cannot be brought in without consultation, and a wide range of organisations that must be consulted in broad terms is specified. It will not have hit your desks yet, but you will see the kind of consultees and stakeholders with which we are consulting. The big check is the consultation.

**Mr Frew:** You can see my concern, and it is probably a real one. Take, for instance, last weekend, when a code of practice was put out in draft form, and everybody went boogaloo. Codes of practice are powerful documents, even in draft form.

**Mr Mee:** I will reiterate the point that Martina made. I understand that it has caused anxiety for some people, and we do not want that, but, at the moment — certainly since I looked last night — we have heard only from the industry so far. We have not heard from other stakeholders yet. We have to have a balance in our consideration.

**Mr Frew:** Let me use hyperbole again. Some in the industry have been cited as saying that it could put their lights out. Someone said to me at the weekend, "This could put our lights out". Imagine a Minister who wanted to put the bookies' lights out. I am using hyperbole, but the Minister could use a code of practice to do that.

**Mr Mee:** What we would say is this: the code of practice has to work within the framework of the law. There is still the licensing regime. There are still things that are allowed and things that are not allowed. That is broadly our position. As we see it, there is no direct power in the legislation for a Minister to put the lights out.

We can take that point away and think about it. What you are getting at is whether an incoming Minister could indirectly put the lights out through the code of practice.

**Mr Frew:** Yes. I am worried now about a safeguard for the future when the Department has the power to issue one or more codes of practice. Thank you.

**Ms Armstrong:** Could the consultation on the codes of practice be used to help us with the issue that we have with the Department for Digital, Culture, Media and Sport (DCMS)? Earlier, we talked about scratch cards being available in the corner shop and the fact that Northern Ireland has no control to put them behind screens and take them out of public view. If we want to limit advertising in order to protect under-18s and vulnerable people, is there an option whereby, in the consultation for Northern Ireland, we could ask questions about whether scratch cards or any betting paraphernalia should be put behind screens and taken out of public view, in the same way as cigarettes are, and whether their advertising should be limited? If Northern Ireland chooses to remove scratch cards from public view in order to protect vulnerable people and under-18s, we could use that proof, in advance of the White Paper's coming out, to put pressure on DCMS.

**Ms Campbell:** This would need to be confirmed by legal counsel, but, as far as we are concerned, we cannot legislate for a reserved matter. The National Lottery is reserved. As I said, the Minister has written to DCMS in the past about advertising in particular, along with other issues, and we have a commitment from Chris Philp, the gambling Minister, that, when the White Paper is produced, he will meet the Minister to discuss devolved issues.

**Ms Armstrong:** OK. That is why I am wondering whether we could have a question in the consultation on the codes of practice to ascertain the public's view: not for us to regulate, but to provide as proof to DCMS.

**Ms Campbell:** We might be able to do that in a consultation, but I am not sure how far that would get us, given that it is a reserved matter, and, as such, the final decision rests with the UK Government.

**Ms Armstrong:** Absolutely. I am just trying to think of ways in which we could provide the evidence from the Northern Ireland public. Westminster does not really pay attention to co-production and co-design in Northern Ireland. We are concerned about scratch cards. If there were a way in which we could proactively provide evidence to DCMS, could it be included in the consultation?

**Mr Mee:** If we could do it, Kellie, we might necessarily have to use the codes anyway. That is if we could do it. The codes are meant to be read alongside the framework of our current legislation. You will see that the draft code of practice states explicitly:

*"These Codes do not apply to or have any bearing upon the operation of the National Lottery which is separately regulated under the National Lottery Act 1993 and the National Lottery Act 2006."*

**Ms Armstrong:** I know.

**Mr Mee:** We are therefore really working within the scope of the power that we have. Whether we could look at that from another direction, I do not know. It had not occurred to me.

**Ms Armstrong:** That is why I am asking whether it could be included in the code of practice on marketing to children and young people. It is about the advertising side of it. In places that have a licence, it is the only form of betting that is front and centre at the till when you go to buy a newspaper. It is not about stopping the lottery but about protecting people. That is where I am coming from. I am trying to get around the issue, I suppose. *[Laughter.]*

**Mr Mee:** The concern is clearly there. Martina, I think that the Minister has written about advertising in general, as well as about sponsorship and so on. To be honest, I do not have a straight answer for you —

**Ms Armstrong:** I just wondered if it could —

**Mr Mee:** — because it is not something I have thought about.

**Ms Armstrong:** Chair, I wonder, when the consultation on the code of practice happens, whether, on the section on marketing, we could ask the public whether that is something that they want us to address with DCMS. Is there a way to word that? I will leave it in the witnesses' hands to check that.

**Ms Campbell:** OK. Chair, with your permission, we will certainly take that away. As I said, we will need to do another consultation on a revised draft of the code before we get to the point of issuing the codes of practice.

I remind the Committee that the law changed in September, so it is now illegal for under-18s to buy scratch cards. Provisions are in place requiring that a responsible adult be in place to supervise sales, particularly in small shops where there could be 16-year-olds minding the till and selling tickets. There is a bit of protection there.

We will, however, take that issue away, have a think about it and see whether we could include *[Inaudible owing to poor sound quality.]* You reminded me that we could get information on the public's views from surveys. I mentioned previously that we are having discussions with colleagues in the professional services unit about a range of questions that could be included in surveys. Prevalence is a big issue. From our own prevalence survey, we know that something like 49% of people who gamble buy a lottery ticket. The survey drills further down into that.

We talked about the need to have good data collection that will inform policymaking. There is a big piece to be done on behaviour and attitudes. Once we get the results of that survey, it could be used as evidence to be presented to DCMS of the issue that we are having with scratch cards in particular.

There is merit in what you say, and I think that we have a way of doing that. It may not be within the code, but it is certainly in our thinking, if that helps. We just do not have a definitive answer for you.

**Ms Armstrong:** To be honest, I think that we are all on the same page. We are finding ways in which we can access and present that information. I absolutely get where you are coming from. If there is another avenue by which to get that, rather than interfering with the code and taking it out of scope for Northern Ireland, that will be brilliant. Thank you so much.

**The Chairperson (Ms P Bradley):** No other members have indicated that they want to ask anything further about clause 15. I will therefore move to clause 16, which is "Short title and commencement". The Committee very briefly considered this commencement clause on Tuesday, and no queries were raised. We looked at it very quickly, and we touched on the commencement of clause 15 today. Will clauses 7, 12 and 14 also come into operation on a day appointed by the Department?

**Mr Mee:** Yes.

**Ms Campbell:** Yes. We will need to do commencement orders for those clauses.

**The Chairperson (Ms P Bradley):** All right. Members do not have anything further to add, so that is us finished, Martina and Ciarán. Thank you so much for your time.

**Ms Campbell:** Thank you.

**The Chairperson (Ms P Bradley):** As you know, we are now going into closed session. Thank you.

**Mr Mee:** Not at all. Thank you.