

## Is suicide reporting a regulatory condition that simply cannot be checked within reason, asks GBG

“ There already exists an obligation within LCCP (Ordinary Code 1.1.1) for licencees to ‘disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions’. Operators are reporting ‘deaths by suicide’ without the need for this additional change.

It is therefore hard to understand why an additional regulatory burden in the LCCP is necessary when a simple reminder of the existing obligations would deal with any perceived lack of understanding.

The question remains as to how the Gambling Commission would begin to go about regulating the proposal to impose a mandatory requirement to report deaths by suicide?

Specifically, how will the Regulator know that a Licensee has not reported a ‘death by suicide’ by one of its customers?

The only logical answer to this is that the Gambling Commission will be notified by a third party, which would potentially include the media - we are aware that the Gambling Commission regularly scans the media for ‘things they need to be aware of’. If this is the case, then the Commission will be made aware of ‘death by suicide’ through existing channels, rendering these Proposed LCCP changes unnecessary. The Gambling Commission check the self-exclusion scheme data bases for the names of those who have ‘died from suicide’, therefore the additional requirement for licencees to undertake the same function is not necessary.

Moving from regulating to enforcement, Para 32 states that ‘failure to report the event’ would mean ‘The Commission would have the power to commence enforcement action which could lead to a sanction as a result.’

The piece of information missing from this section is how the Gambling Commission would go about proving

### REGULATION

The Gambling Business Group has long argued that suicide is a highly complex and sensitive issue which according to academic research cannot be attributed to any one factor. GBG CEO **Peter Hannibal** believes The Gambling Commission’s proposals not only ignore expert opinion but also fail to recognise that operators are already reporting deaths by suicide as part of the LCCP obligation. According to the GBG, this is another example of misguided, unnecessary and unenforceable regulation.

- beyond reasonable doubt - that the Licensee actually knew about the ‘death by suicide’ and then chose not to report it to the Gambling Commission. The fact that it may have been printed in the local paper is not evidence that a Licensee has seen it and not acted upon it. It would appear from what is written in the con-doc that if any such sanctions were imposed by the Gambling Commission, they would not stand up in any fair and balanced appeals process.

Turning to the really important macro issue, respected academics argue that suicide is not caused by a single factor. Rather, “it is the end product of a complex set of biological, psychological, clinical, social and cultural determinants that come together in a perfect storm.” (O’Connor (2021), pp12-13) and that “speculation about the ‘trigger’ or cause of a suicide can oversimplify the issue and should be avoided” (The Samaritans (2021), p4).

Collectively, society is a long way from understanding the complex relationships that lead to suicide, and for the Gambling Commission to start alluding to causal links between gambling and suicide through the auspices of this Proposal is in our view naive, and to quote the Samaritans “increases the risk of contagion”.



### An impossible requirement? Peter Hannibal writes...

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