19 October 2016

Dear Pastors,

A Letter To Member Churches Regarding Remote Gambling Platforms

On 5 October 2016, the National Council of Churches issued a statement expressing its concern that the government has authorised two operators to provide online gambling services. The Council urged the government to review this decision.

Subsequent to the statement, representatives from the Council had a candid and important face-to-face discussion with the Ministry of Home Affairs (MHA) and the Ministry of Social and Family Development (MSF). Both the government and the Council agree that public policies should serve the best interests of society and the common good.

The Council recognises that the government's decision to allow authorised operators to provide online betting services under stringent controls and safeguards is a judgement call. Given the data on the current remote gambling landscape, the government deems this to be the best approach to mitigate driving remote gambling activities underground and exacerbating law and order concerns. The government acknowledges the Council's deep concern about the negative social consequences of legalising two remote gambling platforms, and will regularly monitor the overall impact.

The government explained that by allowing certain operators to provide online gambling services, it was not sending 'confusing and conflicting signals'. This is because the Remote Gambling Act (RGA) of 2014 does contain the provision for 'exempt operators'. The Government had explained in 2014, when the Act was passed, that there will be some exemptions given, because the government did not think a complete ban will work. The RGA, including the provision of exempt operators, was discussed with social service leaders and representatives from religious bodies at the time before it was tabled and passed by Parliament in 2014.

The government maintains that allowing exempt operators to provide online gambling services under stringent controls is the best approach to limit and contain any adverse social consequences. This conclusion is based on the studies on the social impact of gambling that the government has documented and its assessment of possible scenarios with and without the 'valve' of controlled exempt operators.

The Council, however, expresses its reservations about this conclusion for the following reasons:

- Research on this area is still nascent;
- Statistics often do not tell the whole story or present a complete picture because they are confined to tangibles that can be empirically observed and documented;
- The personal and social impacts of gambling, however, are often much deeper and more profound. They have to do with dysfunctionality, pain, anguish and other states of mind that are not easily discerned and mostly cannot be measured.

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 The family and social fabric of our nation is currently not strong enough to provide the needed safeguards against problem gambling and social ills brought on by albeit controlled legalising of online gambling.

The Council also pointed out that the long working hours and the hectic pace of life in Singapore have already taken their toll on the family. The legalisation of online gambling may lead to more adverse consequences for family life, including providing poor role models for our youth, and could even have a negative effect on some work environments. Hence, the Council's call for the government to review its decision to implement the 'exempt operators' provision in the RGA with strict controls.

On its part, the government is willing to proactively strengthen the family and social environment to prevent and mitigate the harmful consequences of online gambling. The government proposes to meet NCCS leaders in three to six months' time to take this further.

Addressing the whole issue of remote gambling, the NCCS intends to initiate the following:

- 1. Form a Task Force to explore (a) possible strategies to strengthen the family and our social fabric to mitigate the harmful effects of gambling, especially the temptation of online gambling; (b) how to care for and restore problem gamblers within our own congregations and those beyond our membership; (c) ways of working with the Roman Catholic Church, other faith communities and the government on this area.
- 2. Publish a Tract on Gambling that can be placed in the hands of every church member and can be used as the basis for teaching and discussion on the subject.
- 3. Monitor the situation of online gambling closely with the help of member churches and provide feedback to the government.

The NCCS sees the social challenge of controlling the dangers of gambling as an opportunity for the church and other intermediate organisations in society to play its role in nation building. It appreciates and upholds the space given to the Council and other responsible bodies to voice their views and concerns without being on a collision course with the governing authorities. While NCCS has engaged this public square issue at the institutional level with the authorities, it acknowledges that there are other ways for the citizenry to convey its feedback and concerns to the government.

The Council will always endeavour to play its part as a responsible intermediate organisation to seek the welfare of our city-state and to work together with the government and other religious and grassroots organisations to promote the common good and the durability of a commendable quality of life for our people.

Sincerely in Christ,

Bishop Rennis Ponniah President, NCCS

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Rev Dr Ngoei Foong Nghian General Secretary, NCCS