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Gambling Act Review Response 2021



Introduction

This paper represents the formal GamCare response to the Gambling Act Review which was published by the Department of Digital, Culture, Media and Sport on 8th December 2020.

We wholeheartedly welcome the Review of the 2005 Gambling Act, and the regulatory framework that has provided the basis for the delivery of support and treatment services since the Act was introduced.

As the leading provider of treatment and support services, for those harmed by gambling, we have access to extensive qualitative and quantitative data about those harmed by gambling, their views on the current system and the impact of gambling on their lives.

We have included analysis of our data within this submission, however if any further information or analysis would be helpful please get in touch with us at jenny.olsen@gamcare.org.uk

We have organised our submission in three parts.

Section 1

About GamCare

Section 2

Summary of GamCare Positions

Section 3

Question by Question responses

Section One: About GamCare

GamCare is an independent charity and the largest provider of information, advice, support and treatment for those affected by gambling harms across the UK. We provide confidential, non-judgemental services, and since 1997 we have supported more than half a million people to get their lives back on track.

4

We now have 150 FTE staff, working across a range of services to meet high demand for gambling support. In 2020, 88% of our operating costs went towards helping people through our clinical and community services.

We are members of The National Gambling Treatment Service which is commissioned by GambleAware, and we work in partnership with colleagues across the system.

We work constructively with all parts of our sector and are part of the NHS England Working Group which is responsible for integrating care systems for the NHS gambling clinics outlined in the Long-Term Plan, as well as taking a leading role in developing and disseminating care pathways across the National Gambling Treatment Service (NGTS) to make sure clients receive the most appropriate interventions at the right time however they choose to access services.



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Just wanted to thank each one of you for all the help and advice during my journey dealing with problem gambling. You all honestly saved my life.

HELPLINE LIVE CHAT USER

Our Mission

We believe that anyone affected by gambling harms should have access to free, confidential advice and support in the right way for them.

We also passionately believe that effective education and awareness-raising programmes are an essential part of tackling gambling-related harms in the long term, and that gambling should have parity with education around other risky behaviours such as drinking or smoking.

GamCare takes a non-judgemental approach on gambling and serves to amplify the voices of our service users.

For many people gambling is not a harmful activity, but for some it can become a serious problem. Gambling harms can be devastating for individuals, families and communities, and we exist because we believe that no one should suffer because of gambling. Harms should be prevented and if experienced should be reduced and overcome, we are here to help.

5



How many people suffer from gambling harm?

In its introduction, the call for evidence for the Gambling Act Review states there are around 300,000 people classed as 'problem gamblers' across Great Britain.

We prefer to use the figures taken from the NHS Digital Health Survey England due to its robustness and use of the full PGSI and DSM-IV screens.

The latest data from the NHS Digital Health Survey for England in 2018 shows that the prevalence of problem gambling (according to the PGSI or DSM-IV screen) was 0.5%, around 340,000 people.

- The Gambling Commission's regular telephone survey (2019), which uses the PGSI mini-screen observed a slightly higher problem gambling rate of 0.6% for Great Britain, around 350,000 people.
- It is therefore likely that there are between 300,000 - 400,000 people experiencing harm because of their own gambling across Great Britain.



Our Services and Programmes

As the leading provider of information, advice and support services for those affected by gambling harm we operate a wide range of support and treatment services.

The National Gambling Helpline

- We run the [National Gambling Helpline](#) 24 hours, 365 days a year, over the phone and via live chat.

Every year this service receives up to 40,000 calls to our trained advisers, who listen and provide tailored support to each individual concerned about gambling, whether their own or a family member's or a friend's.

- A key part of this support can be for an appropriate referral to treatment that we provide along with a range of providers across the National Gambling Treatment Service.



Treatment and referral

We support the delivery of locally accessible face to face treatment for those experiencing gambling harms, both through direct delivery and via our [partner network](#) which operates in a combined total of 161 locations across Great Britain. We also work with and deliver services in partnership with:

- other members of the National Gambling Treatment Service such as NHS Northern Gambling Service and NHS National Gambling Clinic, both of which offer vital support for those with more complex needs.
- Gordon Moody Association, a specialist in residential care.
- the [Leeds Community Gambling Service](#) is provided in partnership with NECA and Leeds City Council as an integrated, holistic service in collaboration with the NHS Northern Gambling Service.



Digital support services

We are committed to delivering services that help people meet their needs. We manage and support a range of digital engagement and online resources which include:

- a moderated online Forum, with 60,000 registered users and group daily chatrooms so that people can speak to others experiencing similar issues and seek support
- digital 'Brief Interventions' designed to help people reflect on their gambling and motivate them to make positive changes
- GameChange, a dedicated online course of Cognitive Behavioural Therapy (CBT) modules supported by regular contact with our therapists
- a suite of downloadable self-help resources which can help gamblers explore how gambling impacts their lives and understand the steps they can take to reduce the harms they experience.



Education and prevention programmes

Our education and prevention programmes are funded by a combination of donations and grants and are focused on specific issues and challenges.

8

Supporting Women

- Our [Women's Programme](#) looks to address the under-representation of women accessing gambling support services. The first two years of the programme were supported by the Tampon Tax Fund, and our next two years will be supported by regulatory settlement funding directed by the Gambling Commission. In the first year of delivering this programme, GamCare focused on barriers to women accessing help - such as shame, stigma and a societal perception that gambling is not an issue which affects women. In doing so, we worked with over 1,300 organisations and more than 8,500 professionals to deliver our CPD accredited training. This training increases understanding of how gambling harms intersect with other issues women face, such as gambling being perceived to be a 'male issue', domestic abuse and legacy harms such as financial impacts. Training also increases the confidence of professionals who attend to talk to women about gambling harm and makes sure they can signpost or refer women appropriately for further support. Increasing the recognition of gambling related harms within the wider health, social care and communities workforce by

upskilling thousands of personnel means that women's needs are better identified. Through this programme we aim to use our learning to increase the skills and experience of thousands of intermediaries who can go on to better identify women who need support for gambling related harms.

We are strengthening referral pathways into support and treatment services as well as designing tailored treatment options in consultation with women. We are engaging with academic partners to gather and interrogate data from screening and treatment services to ensure continuous improvement.

- We are continuing to test new ways of supporting those seeking help with gambling. Since introducing our GameChange online CBT course in November 2019, an encouraging number of women have signed up (32%).

Supporting Young People

- According to [Gambling Commission data](#), 2.7% of young people aged 11-16 are deemed to be 'at-risk' of being harmed by gambling. Giving young people the facts about gambling and gaming, plus building their critical thinking skills and digital resilience, are key in helping them make informed choices about their participation in gambling in the future, and preventing further harms.

Our [Young People's Gambling Harm Prevention Programme](#), delivered in partnership with the Young Gamers and Gamblers Education Trust (YGAM), seeks to ensure that all 11-19 years olds in the UK have access to at least one gambling awareness education session during their educational careers.

The programme also equips teachers and education support staff with knowledge and information to identify at-risk young people and access support. The programme is funded by the Betting and Gaming Council until 2023 via a fund managed by the Charities Aid Foundation.

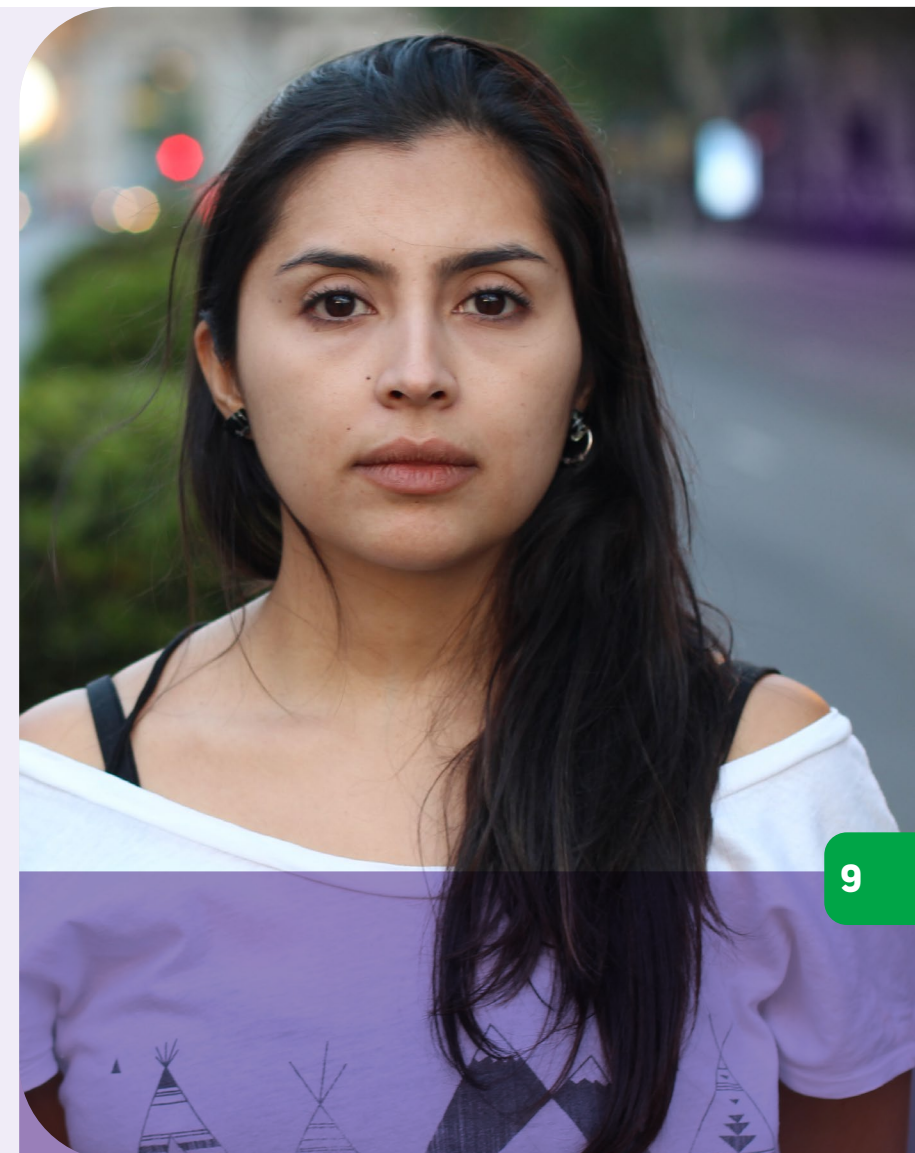
- For the first time we are also able to provide dedicated young people specialist support to those under 18 as part of the programme.

Our Young People's Service provides a menu of options for young people so they can find the right support at the right time, whether they are affected by their own gambling or that of a loved one, such as a parent.

Support in the Criminal Justice System

We currently work with/within a number of prisons, police custody suites, courts, and with probation and community rehabilitation companies (CRC) teams in order to support individuals affected by gambling-related harm. Our work also includes providing training to professionals within the Criminal Justice System (CJS).

We can provide a range of materials to support those in contact with the CJS, including activity packs and workbooks, and where possible with the support of the relevant CJS agency, we can also offer one to one or group support, online or telephone interventions as appropriate.



9



It's really complex, the shame you feel - it's like you're letting everyone down. My message to other women experiencing harms because of gambling is that you're not alone. It can happen to anyone, and you shouldn't be ashamed to ask for help.

GAMCARE SERVICE USER



Raising standards, training and accreditation

GamCare is committed to driving up standards of customer protection in the gambling industry. We have developed a range of online materials, training modules and a formal accreditation programme to improve customer protection and support safer gambling:

Safer Gambling Standard

- Our [Safer Gambling Standard](#) (launched in 2019) provides an example of how a quality standard can work alongside regulation to raise standards of safer gambling practice in the industry. It is a rigorous accreditation programme for the gambling sector, that we would like to see all gambling businesses achieve in order to drive up awareness and standards of customer protection.

Businesses applying for accreditation must demonstrate their compliance across a broad range of criteria and are able to achieve one of four levels of accreditation. We would encourage the regulator to highlight the Safer Gambling Standard in some way, in order to encourage uptake from gambling businesses to allow customers to make informed decisions about those businesses which have demonstrated that they care about reducing gambling harms.

- We launched our [Gambling Related Financial Harms Programme](#) in 2019 to bring together the banking, gambling and debt advice sectors to tackle the range of financial difficulties that can be caused by gambling through the promotion of best practice support, better identification and more effective customer support.

Financial Harm Toolkit

- We launched our Financial Harm Toolkit in 2020. It is a comprehensive toolkit for financial institutions, gambling businesses and debt advice agencies across the UK to help them recognise, support and refer customers experiencing gambling-related financial harms.

The toolkit is aimed at giving organisations the tools to offer consistent, high quality customer communications about gambling risks, and improving access to support so that issues can be addressed as early as possible and don't escalate.

Industry Code of Practice

- GamCare has developed an Industry Code for the Display of Safer Gambling Information, which sets out how online gambling businesses can make information about safer gambling tools and specialist gambling support services more prominent, visible, and consistent for online customers, ensuring resources and services are clear and easy to access. All members of the Betting and Gaming Council are committed to implementing this Code by August 2021.

Training

- GamCare provides a range of training for gambling businesses, specifically designed to:
 - Improve understanding of gambling behaviour and psychology
 - Increase awareness of the impacts of gambling harms
 - Increase the confidence and skills to identify and interact with customers experiencing harm, and connect them to the most appropriate support

Our training for other sectors also focuses on how gambling harms might intersect with other issues experienced by at-risk groups, so the organisations we work with can better identify and support people who are affected.

The Safer Gambling Standard

The Safer Gambling Standard is a quality mark that provides an example of how a quality standard can work alongside regulation to raise standards in the industry. Since February 2019 we have made 16 Safer Gambling Standard awards. Not all operators that we assessed completed the assessment process or received an award.

As a result of operators completing the Standard, millions of customers are more likely to have a safer gambling experience. Operators completing the Safer Gambling Standard are asked to estimate active customer numbers for the last 12 months. Figures quoted are sometimes difficult to verify, particularly in land-based environments. The following estimates were received:

Online:
14.6 Million customers

Land-Based:
46.3 Million. This includes an estimate of the number of people who play the National Lottery.



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For safer gambling measures to be effective, it is essential that they are integrated into organisational culture and flow throughout the organisation. The Safer Gambling Standard focuses on the totality of an operation, from board members and directors down to the front line.

ANNA HEMMINGS, CHIEF EXECUTIVE, GAMCARE

GamCare Data: Key insights

GamCare in Numbers



12



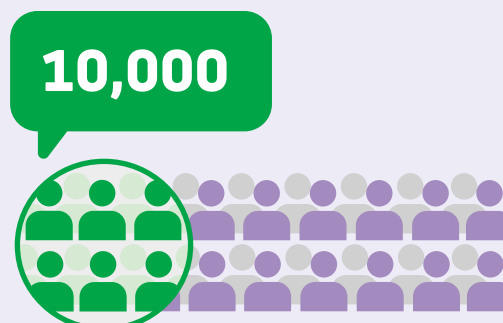
Nationwide Treatment

Supporting treatment in **161 locations** across Great Britain



Number of helpline calls

c.40,000 calls from 30,000 individuals each year



Number in treatment

10,000 each year



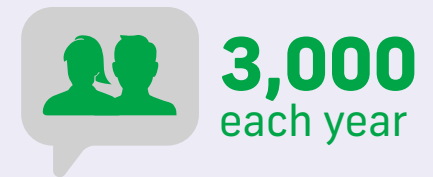
Forum and chat users

Number of **registered forum** and chat users: **60,000** to date



Chatroom hours supported

Number of **chatroom hours supported**: over **650** each year



Group chat room participants

Online **group chat room participants**: at least **3,000** each year

13

Demographics of those seeking help from GamCare

- 65% of those who seek help from us are men, but the number of women seeking help has grown by 34% in the four years up to 2020. Data from our Helpline shows that the number of gamblers identifying as female contacting our services has risen, from 2,303 in 2015 to 3,109 in 2019/20.



Rise in females contact

- As many as 20% of those who seek our services are doing so on behalf of a loved one (around 8,000 people a year) - we call them 'affected others'. Of this 20% who are 'affected others', as many as 80% of those are women. (6,400).
- The largest demographic seeking help from our Helpline are between 18 and 35 years.
- Of those who disclose their ethnicity, the majority were white. Research from GambleAware (2020) identified high demand for treatment in BAME communities (31% vs. 15% for their white counterparts), and the same study found that 35% of female gamblers in the UK came from a BAME background, compared to just 12% of the overall female population. We believe that BAME adults are under-represented across our treatment services, but less so on the Helpline.
- In 2019/20, ethnicity reporting for the Helpline was comparatively low, callers often choose total anonymity with data available for 35% of Helpline callers. The majority of both gamblers (87%) and affected others (89%) who disclosed their ethnicity when contacting the Helpline in 2019/20 were White, Asian or Asian British was the next largest ethnic group (7% and 6% respectively). Asian callers were more likely to contact the Helpline multiple times, accounting for 13% of frequent callers compared to 7% of callers overall.
- The majority of gamblers (69%) and affected others (89%) using the Helpline are in a relationship or married.



Gambling Behaviours

Through the Helpline and treatment services we run we are able to track the changing behaviour of gamblers:

- the most common form of gambling reported to us is now online with this trend increasing significantly over the last 5 years
- the majority contacting us are gambling online. Of the calls we receive 75% cite issues with online gambling and 46% have issues with land-based gambling although some callers have issues with both



Gambling online

- women are more likely than men to gamble online, mainly on casino and slots
- BAME communities are more likely to gamble offline than online
- offline gambling increases by age group (older people more offline).

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I was 22 and had lost all my savings, as well as being in £1500 worth of debt. I realised that my gambling was out of my control now, there was no excuse anymore.

MATT, GAMCARE SERVICE USER

Gambling Impacts

It is clear from our analysis of those seeking help that we need to consider gambling as a health issue, a social issue, and a technology issue:

- anxiety and stress was the most common mental health impact for gamblers (62%) and affected others (53%) for callers to our Helpline in 2019/20
- 11% of gamblers contacting the Helpline in 2019/20 told us they had experienced suicidal thoughts, either currently or in the past. According to [research from GambleAware](#) (2019): One in five problem gamblers had thought about suicide (19.2%) and one in twenty (4.7%) had made a suicide attempt in the past year.
- 66% of gamblers calling the Helpline reported being impacted by financial difficulties because of their gambling
- as many as 74% of gamblers calling the Helpline reported having debt issues, with at least 10% of callers reporting large levels of debt between £20,000 - £99,999



Debt levels

- 45% of gamblers using the Helpline identified family/relationship difficulties as a significant impact.

When do people seek help?

We need to encourage people to reduce harm earlier and help more people to access treatment.

- Putting barriers in place between themselves and gambling is a key first step for many people, over 190,000 are registered for GAMSTOP. 72% of our respondents to a recent GamCare survey believed limits to spending and time should be set on all gambling accounts by default, with the option for the individual to adjust their spending and time limits.
- The numbers of people accessing help for gambling problems is very low. If we take the total cohort believed to be problem gamblers as 340,000, we see about 10% of those on our Helpline (38,000 calls from 27,000 callers in 2019/20).



Help for gambling problems

- The numbers of problem gamblers accessing treatment is even less at 3% which is low when compared to the number of dependent drinkers accessing treatment.



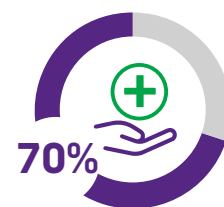
Gamblers accessing treatment

- People frequently don't seek help until they are in crisis, this is reflected in the fact that the PGSI score on entry to treatment is routinely 20+, indicating severe problem. As a behavioural addiction, gambling problems can be more easily hidden than problems with alcohol or other substances, and coupled with a lack of recognition around the issue (both for individuals and professionals) and layers of stigma and shame to be overcome, it can be a significant amount of time before people seek support.

The impact of treatment

We know that getting access to effective treatment early is the key to reducing the impact of gambling harm on individuals, affecting families and on the health and social care system.

- Treatment is often short term, the average number of sessions being six, with significant gains made in the first three sessions.
- Treatment is effective: the majority of users complete their agreed course of treatment (70%) and have significantly improved PGSI and quality of life scores.



Treatment is effective

- Affected others are under represented in treatment services, as are women, and BAME communities (DRF data).

The impact of the COVID-19 Pandemic

The current pandemic is creating new challenges and has compounded existing ones.

- The impact of the pandemic on gambling behaviours and resulting harms is still to be fully understood, but we know from our work that contributing factors, such as financial distress, isolation and boredom are increasing.
- Gambling Commission data from March - December 2020 has found that 'engaged gamblers', i.e., those already likely to be engaged with three or more gambling activities per month, are increasing the time and money they spend gambling, as well as using online gambling products they had not tried before.



Engaged gamblers

- Data from our services showed a steep drop in contacts to the Helpline in the initial phase of the first national lockdown in 2020, but subsequently a significant switch to live chat as opposed to phone contacts.

This highlights that many users are concerned about privacy and therefore may be more reluctant to seek help at this time.

- Staff on our helpline have flagged increased concern around domestic abuse being experienced by callers, and an overall increase in safeguarding concerns flagged.



This is a concerning context for people at risk, and an even more pressing need to raise public awareness about the risk of gambling harms combined with targeted campaigns to promote the support and practical tools which can help people stop gambling (such as our [TalkBanStop](#) partnership campaign with Gamban and GAMSTOP).

We published our findings from the first lockdown [here](#).

Section Two: Overview and summary of GamCare's positions

Along with our vast experience of supporting those with gambling problems and the data and insight that gives us, we also conducted a survey of our audiences on the Gambling Act Review.

We had 343 responses in total from those who identify as gamblers, those affected by a loved one's gambling or those who have a professional interest in gambling support.



GamCare is committed to supporting those experiencing gambling harm. The Gambling Act Review offers a unique opportunity for us to amplify the voices of our service users and advocate for changes they would like to see.

ANNA HEMMINGS, CHIEF EXECUTIVE, GAMCARE

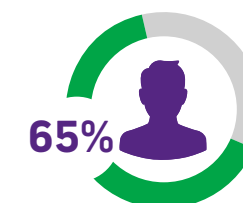


Overview and key challenges

We need sustainable funding to ensure more people can access the support and treatment that works for them.

- GamCare is committed to delivering the best possible education, support and treatment for those at risk of or experiencing gambling harms. We are keen to highlight the lack of national infrastructure and resources available to support research, education and treatment services for those harmed by gambling. These are currently underfunded relative to other addiction services and are not universally available to all those who can benefit from treatment.
- GamCare have developed a robust and fully costed proposal to transform the availability and quality of treatment services to a target of 15% of those suffering harm over five years. We believe that this model can deliver significant benefits to individuals, their families, and the public sector, we have included further information below.
- We are also keen to highlight the criticism we and other National Gambling Treatment Service providers face over receiving funds from the gambling industry, albeit via GambleAware. Calls for increased funding (no matter the source) aim to improve outcomes for those suffering from gambling harm. No matter what new funding arrangements are developed, we are clear that we will always ensure that service users, their views and their needs are at the centre of the development and delivery of our services. We need to encourage people to seek help earlier, and ensure more people can access the treatment they need.

- Young adults (under 35) account for 65% of people seeking help through our helpline. Our conversations with them tell us that they lack understanding of the risks of gambling and we are keen to see more of a focus on the development of education programmes to educate young people. On-line advertising targeted on young people is a particular concern.



Young young adults seeking help

- The wider impact and support available to friends and family (affected others) needs far greater attention. 20% of calls to our helpline are from this group, of whom the vast majority are women.
- There needs to be greater focus on BAME communities - [evidence](#) suggests that people from these communities are less likely to gamble, however that they are more likely to suffer gambling harms when they do. We are conscious that BAME communities are underrepresented across our treatment services, and therefore their voices are largely missing from the narrative around gambling harms in Great Britain.
- The impact of gambling on the Criminal Justice System is under recognised and needs further awareness raising and treatment pathways.
- We have developed a Safer Gambling Standard accreditation programme that we believe can play a significant role in driving up standards across the gambling industry. We would encourage the regulator to highlight the Safer Gambling Standard in some way, in order to encourage uptake from operators and allow customers to make informed decisions about where they spend their money.

A GamCare proposal for improving access to treatment

- The Gambling Act Review presents an opportunity to review and reform how the regulatory system supports the delivery of research, education and treatment services.
- Although the Gambling Commission publish a regular health survey to estimate gambling prevalence, the sample size is moderate given that only a small proportion of the GB population experience gambling problems.
- We were pleased to see the need for expansion reflected in the consultation document and are keen to take this opportunity to set out our proposals.



DHSC is working with the NHS and GambleAware to ensure the best use of available funding, and to align and integrate the expansion of treatment services across the system so patients get the right treatment at the right time.

GAMBLING ACT REVIEW DECEMBER 2020

- Owing to the organic development of the national treatment network, whilst treatment is available across the majority of England, Scotland and Wales, accessibility and capacity is variable and the network has not developed at a consistent rate nationally.

Northern Ireland is also an entirely separate regulatory regime under the jurisdiction of the Police Service of Northern Ireland (PSNI) rather than the Gambling Commission.

- The gambling treatment sector sits outside of public sector departments. Currently the services available at a local level and the access to those services is often driven by the scale and proactivity of the local provider, rather than the level of need of the local community.
- Voluntary contributions from the gambling industry account for a large proportion of treatment spending in the UK, amounting to around £4.5m in the first three quarters of 2020. This amount is not the total amount of funding that Gamble Aware contributes to treatment through the NGTS. It is however significantly dwarfed by the £450m and £350m spent per year on drug and alcohol treatment respectively.

£4.5m

£450m

£350m

Investment in treatment

Whilst we recognise that these figures might not reflect the level of investment needed to prevent and treat gambling harm we do know that current funding is insufficient.

- We hope that this consultation process can help to support investment in the expansion of treatment provision, in a way that can address some of the long standing disparities between gambling and other addictions, and put in place increased support for those in need, particularly for those affected by the Covid-19 pandemic.

- Currently only around 3% of 'problem' gamblers seek treatment, compared to around 18% of people experiencing alcohol related harm. The fact that only 3% of those experiencing gambling harm, access treatment is a serious cause for concern.



Seeking treatment

Treatment is effective and relatively low cost to provide when compared to other health and social care services. A focus on how to support more individuals into treatment has the potential to significantly reduce the impact of gambling harm to individuals, their families and reduce the wider impact on communities and public services.

- We would like to see a national target of getting 15% of those experiencing gambling related harm into treatment, with a new regulatory system delivering the necessary funding to support this expansion over a period of 5 years. We have developed a costed model that could deliver this scale of expansion for consultation with partners and stakeholders.



National target for treatment

- We believe that the current partnership approach between third sector providers and the NHS is the right approach for the delivery of prevention and treatment, as this provides a rich mix of services that can provide tailored interventions to a wide range of service users with different levels of need.
- Our proposed integrated care model builds on this partnership approach, supports current integrated care system thinking and the overall agenda of bringing health and social care provision closer to communities.
- In our proposed model, centrally coordinated services would deliver governance and reporting, driving quality and standards and managing relationships with commissioners and developing evidence of need and effectiveness. Regional hubs would be established to build capacity and skills and oversee local delivery arrangements, including driving up inclusion and access harder to reach groups who may be disproportionately negatively affected by gambling related harms.
- Our proposed model can deliver the necessary expansion of treatment services to engage with 15% of those experiencing gambling harm and also significant improvements for both service user outcomes and value for commissioning bodies.

We are currently finalising our detailed proposals for improving access to treatment which should be ready for circulation and further consultation in April 2021.

Summary positions on Consultation questions

Online protections (Q1-10)

- We believe that more can be done to protect particularly vulnerable groups from online gambling harms.
- With the majority of those coming to us for support and treatment citing problems with online gambling (75%) it is an area of concern for us and our service users.
- Our audiences (which include gamblers, those affected by gambling and those with a professional interest in gambling support) tell us more needs to be done to reduce harm from online gambling. They particularly call for limits on time, maximum limits on spend, and a ban on VIP schemes. They think more can be done to protect younger audiences.
- We are particularly concerned about the visibility of online advertising to children and young people and believe that this needs greater attention.

Advertising, sponsorship and branding (Q11-15)

- We believe that adverts from licensed operators can and should be managed in such a way that they avoid visibility to children and young people and protect those who are more vulnerable to gambling harm.
- A recent GamCare survey showed that 80% of respondents wanted to see a ban on sports sponsorship, and even more (83%) wanted to see a ban on gambling sponsorship on football shirts. We believe that adverts could do more to recognise the potential risks of gambling.

- We know from our service users that the volume of advertising they are exposed to can be problematic for maintaining their recovery, and that the onus is currently on consumers to block access to gambling ads on each platform they visit if they wish not to be served with these. We believe this should change.
- We also believe that advertising should routinely include more prominent and engaging safer gambling messaging and signposting to sources of support such as the National Gambling Helpline and other resources in a more consistent and helpful way for people to easily access the help and support they might need.
- VIP schemes have been cited by our audiences as something that incentivise continued excessive gambling, and they would like to see more done in this area. 82% of respondents to a recent GamCare survey of our audiences, would like to see VIP schemes banned altogether.



VIP schemes banned

- We would like to see operators investing more heavily in their creative marketing of safer gambling tools, messaging, and signposting. Analysis of 'safer gambling materials' has shown them to be drab and lengthy compared with other adverts such as those offering bonuses for example.

Gambling Commission's powers and resources (Q16-24)

- We believe that there is a need to more clearly define the specific objectives and targets and metrics for the Gambling Commission. This would help to set a clear focus and direction of the environment we are aiming for. We would recommend that the Gambling Commission set these objectives and targets in consultation with GamCare and our delivery partners.
- We believe that a strong, properly resourced expert regulator is in everyone's interest. The Gambling Commission does not appear to be resourced to regulate such a fast moving industry and their funding should reflect the scale of the sector and the challenge of regulating in such fast moving environments.
- We support the creation of clear evidenced-based targets for the reduction of gambling related harm that both the gambling industry and those, like GamCare who are involved in education and treatment, can work towards.
- We are clear that the increase in funding for gambling education and treatment is necessary but our key focus is our service users. Increased funding that leads to better outcomes for people experiencing gambling harm matter more than how that funding is structured.
- We believe our Safer Gambling Standard will aid consumer recognition of gambling business who are implementing high standards of customer protection. We see this as complementary to the existing licensing measures that the Gambling Commission deploys. We encourage the regulator to highlight the Safer Gambling Standard as a way in which consumers can make informed decisions on gambling businesses that have evidenced high standards of customer protection.



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They need to have a more public profile so people understand what their role is and what they can do. They need to be stricter with gambling companies.

RESPONDENT TO GAMBLING
ACT REVIEW SURVEY

Consumer redress (Q25-28)

- We support a well-run compliant industry with an Ombudsman that offers a fair and expeditious resolution of complaints in an impartial, confidential and independent manner.
- We believe that there are a number of Ombudsman models that currently work well in other sectors and we are committed to cooperating with the Government on how redress arrangements could be managed in a way that puts customers at their heart.
- We hear from individuals who would seek recourse against gambling operators if there were an Ombudsman and clear process in place. We believe that a lack of recourse to challenge the industry can cause emotional distress and negatively affect an individual's recovery.

Age limits and verification (Q29-38)

- We support increased protections for all vulnerable groups, particularly young people. Our Safer Gambling Standard sets out best practice in relation to protecting young people. We believe that there is a case for tightening advertising protections for children and young people.
- Data from the National Gambling Treatment Service tells us that on average gamblers reported problem gambling starting by the age of 24 years with problems surfacing later. Three quarters reported problem gambling starting by the age of 32 years and one quarter by the age of 19 years. As many as 61% cited an early win as the catalyst for their gambling problems so it's clear that education and outreach is needed to ensure that we protect young adults from these experiences.
- We support a raising of the age for National Lottery play to 18.



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Don't just concentrate with online. Land-based operators need reviewing too.

RESPONDENT TO GAMBLING ACT REVIEW SURVEY

Land-based gambling (Q39-45)

- Nearly half of all those who come to GamCare for help cite issues with land-based gambling (46%).
- Although latest economic and world events have seen the rapid closure of many land-based gambling venues we expect issues with these to persist as we come out of lockdown.
- Gamblers contacting us often have multiple accounts across both land-based and online settings - according to data from the [Gambling Commission](#) (2019), gamblers have three accounts with online gambling operators on average. It is therefore critical that regulation is integrated across online and land-based settings.
- We recognise that there has been rapid development in self-exclusion methods for online gambling. We know from our service users that there are significant inconsistencies in how self-exclusion methods operate in practice in land-based settings.

There are multiple schemes depending on the type of land-based gambling. They include betting shops, casinos, bingo clubs and gaming centres and lotteries. The complexity of having different schemes creates loopholes and limited protection for the determined gambler.

Section Three: Question by question responses

GamCare is submitting responses to these questions based on our experience of being the leading provider of information, advice and support for anyone harmed by gambling harm in Great Britain.

We draw on data from a variety of places: The 40,000 calls that come through our helpline and treatment service every year, a survey we conducted of our audiences that specifically asked questions of the Gambling Act Review that had 343 respondents, and data and insight from a range of sources in our industry.

The quotes throughout are drawn from our survey on this review. GamCare takes a non-judgemental approach on gambling and serves to amplify the voices of our service users.

We have only responded to those questions where we have clear data and evidence to offer. In order to help with the analysis of responses, we have answered each question separately and fully even where this has meant repeating information that is also stated elsewhere in the submission.



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Online gambling was too easy to get involved with, I used to waste time on my phone all the time to the detriment of my family.

RESPONDENT TO GAMBLING
ACT REVIEW SURVEY

Online Protections (Q1-10)

GamCare's position:

- We believe that more can be done to protect particularly vulnerable groups from online gambling harms
- With the majority of those coming to us for support and treatment citing problems with online gambling (75%) it is an area of concern for us and our service users.
- Our audiences tell us more needs to be done to reduce harm from online gambling. They particularly call for limits on time, maximum limits on spend, and a ban on VIP schemes in particular to protect younger audiences.
- We are particularly concerned about the targeting of online advertising at young people and believe that this needs greater attention.

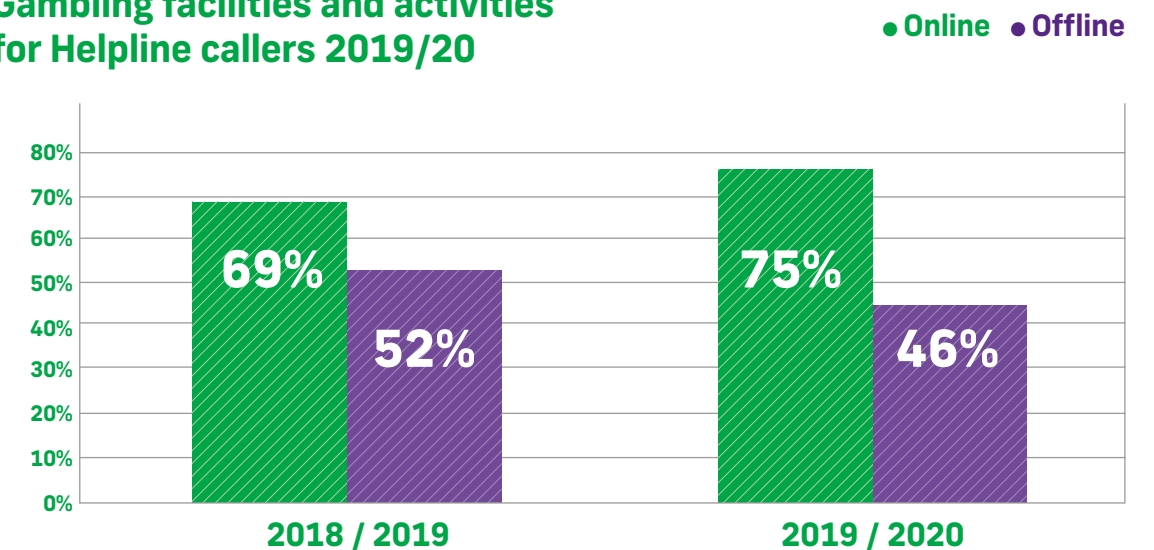
Q1: What evidence is there on the effectiveness of the existing online protections in preventing gambling harm?

Since 1997 we have supported people experiencing from gambling harm - both those with gambling problems and also their family and friends. Each year we receive up to 40,000 calls to our National Gambling Helpline. This along with our work across Great Britain in our 161 face-to-face locations, GamCare and our partner network deliver services from, mean we have unparalleled access to those who are suffering from gambling harm.

The number of those suffering harm from online gambling is growing.

In 2019/20, online gambling was reported as problematic by 75% of Helpline callers, compared to 46% for offline gambling. A greater number of callers than in previous years are reporting issues with online gambling activities, and this continues to rise.

Gambling facilities and activities for Helpline callers 2019/20



GamCare audiences tell us that they want greater online protections

A recent survey (February 2021) of our service users and wider audiences found an overwhelming majority (80%) believe existing online protections are insufficient and ineffective for all age groups:



Gambling advert regulation

92% want more to be done on the regulation of gambling advertising in print/tv/radio/online/social media.



Online gambling harm

88% think not enough is done to reduce harm from online gambling.



Child gambling protection

89% of respondents believed that more should be done to protect children from access to gambling.



Young adult gambling protection

83% believed extra protections should be offered to young adults (18-25) who gamble.

National Gambling Helpline data 2019/20



Online gambling problems

75% of our callers report problems with online gambling, and the impacts of this are multiplying. Out of our total Helpline callers in 2019/20.



Anxiety/stress

Anxiety and stress was the most common mental health impact for gamblers (62%) and affected others (53%).



Suicidal thoughts

11% of gamblers had experienced suicidal thoughts, either currently or in the past.



Financial difficulty

66% of gamblers reported being impacted by financial difficulties because of their gambling.



Debt issues

As many as 74% of gamblers reported having debt issues.



Large debt issues

10% of callers reported debt between £20,000 - £99,999.

Suicidality

GamCare takes reports of suicidal feelings from our callers and those in treatment extremely seriously. Callers to our helpline are a combination of those who gamble (nearly 80%) and those who are calling on behalf of a loved one (over 20%). In 2019/20, around 11% of total callers to the National Gambling Helpline told us they have experienced suicidal thoughts at some time.

According to [research from GambleAware](#) (2019): One in five problem gamblers had thoughts about suicide (19.2%) and one in twenty (4.7%) had made a suicide attempt in the past year. These rates are far higher than those for at-risk gamblers (4.9% and 1.2%) and those with no signs of problem gambling (4.1% and 0.6%).

People accessing our treatment services report higher rates of suicidal thoughts than our helpline. In treatment 26% of service users telling us that they had experienced suicidal thoughts at some time. The increased rates of disclosure could be attributed to the trusted relationship built between them and their treatment practitioner.

GamCare works closely with the person and where appropriate their family and other professionals to increase safety and reduce the risks.

GamCare is working with Samaritans to develop training products for gambling businesses to equip staff with the skills to better identify vulnerable customers and the knowledge of how best to support them.

GamCare is working with the gambling industry to improve safety measures for online and offline gambling

GamCare fully supports clear and consistent language and presentation of safer gambling information, so that this becomes 'the norm' for consumers. Our service users have told us that they find the presentation of safer gambling information inconsistent and confusing.

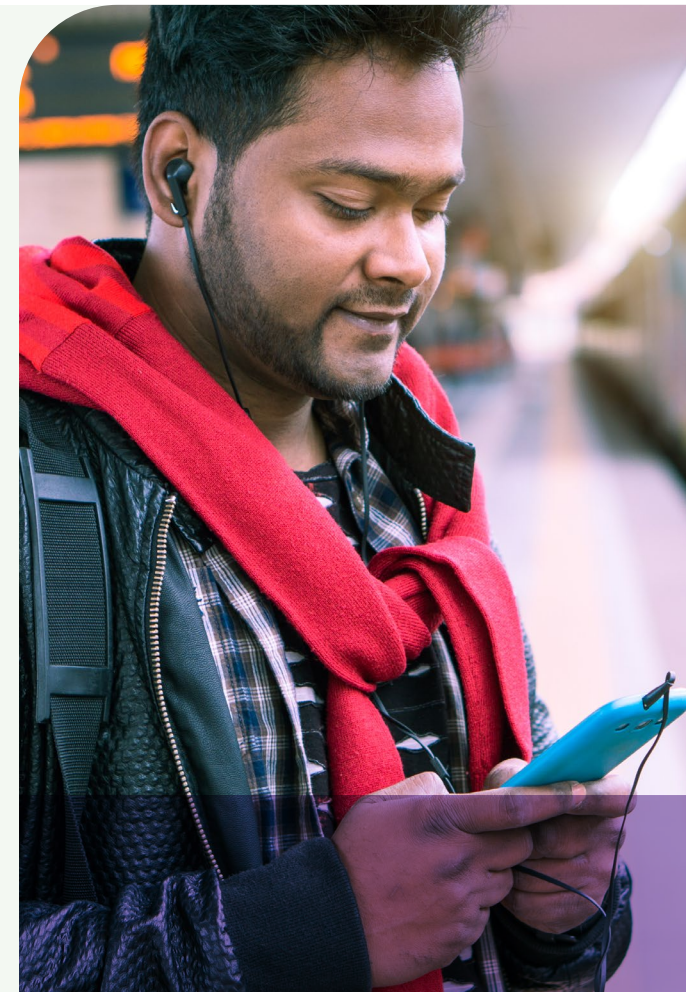
We have now launched a Code of Conduct for online gambling businesses to simplify the information provided about 'safer gambling tools' and support. This has been developed in consultation with people who have experienced gambling harms, as well as gambling businesses and support services.

GamCare supports gambling operators to meet the highest standards of safety are met and launched the Safer Gambling Standard in 2019. The aim of the standard is to recognise those operators who go above and beyond the requirements of the gambling industry Codes of Practice. Operators voluntarily put themselves through a broad range of assessment criteria for social responsibility across their online and/or land-based business operations.

We would also suggest that many gambling businesses could make better use of their own customer data to inform their customer risk profiles, and in turn this should feed into enhancing training programmes for their teams. It is essential that teams across the business are well versed in markers of harm to look out for, and confident to tailor appropriate interventions for customers at risk of or experiencing harms.

Examples of risk indicators might include, but not be limited to:

- Customer registration information
- Self-exclusion and time out data
- Game play data
- Information to support whether a customer's spending is affordable and sustainable
- Payment method and changes in payment method data
- Data on complaints and disputes
- The type of gambling product used by the customer



All I could think at the time was that I wanted the pain to go away. I wasn't thinking about my family or my kids. Eventually I realised I was hurting those close to me, and I understood that I would need support to begin my recovery. I have received support from GamCare and this was a game-changer for me - I have really felt the benefit.

GAMCARE SERVICE USER

Q2: What evidence is there for or against the imposition of greater controls on online product design? This includes (but is not limited to) stake, speed, and prize limits or pre-release testing.

Our recent survey on this review found a significant majority of our audiences are in support of greater controls on online product design. 84% of those surveyed supported a maximum bet per spin on online slot games. Of those who supported a maximum bet, nearly two-thirds (65%) of these respondents agreed that in their view, the limit should be 'under £5'.

We also know from calls to the National Gambling Helpline that:

- Online gambling being reported as problematic has increased, and offline gambling reported as problematic has decreased for helpline callers in 2019/20.
- Online gambling was reported as problematic by 75% of helpline callers, compared to 46% for offline gambling in 2019/20. A greater number of callers than in previous years are reporting issues with online gambling activities.
- Problems with online gambling were also prevalent in service users receiving treatment, with 71% of those in treatment in 2019/20 reporting online gambling as problematic compared to 56% for offline.
- The online facilities and activities most likely to be reported as problematic in 2019/20 were betting 25%; followed by slots 20% and casino games 17%.

The new BGC Code of Conduct on Game Design and recent consultations by the Gambling Commission on online slots have established the importance of enhanced controls on online product design. Some of the new restrictions outlined by the Gambling Commission will be effective from Autumn 2021. The changes were implemented after a consultation and further research highlighted that design features that sped up play, disguising losses as wins, and slot spin speeds faster than 2.5 seconds have been associated with losing track of time, loss of control and binge play.

32



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I have gambled excessively, more default barriers in deposits/ affordability would have limited this.

RESPONDENT TO GAMBLING
ACT REVIEW SURVEY

Q3: What evidence is there for or against the imposition of greater controls on online gambling accounts, including but not limited to deposit, loss, and spend limits?

Debt is a key issue for those experiencing gambling harm

Year on year, around 70% of callers to the National Gambling Helpline, mention some level of gambling debt or financial hardship. Both gamblers themselves and their loved ones can experience harms because of gambling. The majority of gamblers (69%) and affected others (89%) using the Helpline are in a relationship or married. 45% of gamblers using the Helpline identified family/relationship difficulties as a significant impact.

Although some callers to the Helpline do not disclose information about the level of debt they are in we know that last year 18% of callers who did provide an estimate said their debt was up to £5,000. 10% of Helpline callers reported debts of £20,000 to £99,999.

Putting barriers in place is a key first step for many people, and over 190,000 are registered for GAMSTOP online self-exclusion.

Operator imposed limits are important tools to prevent harm, however our audiences tell us they don't think the current measures are enough to prevent harm. We would like to see better evaluation of their use by operators with information on their use shared with the regulator and others to help understand the impact of these measures and improve how they are deployed in the future.

Generally there is a lack of research in this area, although [the Gamble Aware Revealing Reality report](#) has identified straightforward ways to ensure consumers are better protected, such as not having a default limit as the highest option. Consumers may gamble on more than one activity, and with more than one operator, both online and otherwise. In the absence of a Single Customer View (using technology to have a single view of customer activity that could be shared amongst operators), default monthly loss limits can be set low in order that dialogue is encouraged with customers who seek to increase these and an affordability check can take place.

Feedback from GamCare's service users would also suggest that this is a reasonable course of action, and that it creates a sensible but not excessive amount of friction for customers.

72% of respondents to our recent survey believed default limits to spending and time should be set on all online gambling accounts, with the option for the individual to adjust their spending and time limits.

GamCare launched our [Gambling Related Financial Harms Programme](#) in 2019 to bring together the banking, gambling and debt relief sectors to tackle the range that can be caused by gambling, through the promotion of best practice, better identification and more effective customer support.

In 2020, GamCare launched a comprehensive toolkit for financial institutions, gambling businesses and debt advice agencies across the UK to help them recognise, support and refer customers experiencing gambling-related financial harms, and provide consistent communications across all points of the customer journey. These materials draw together best practice and are informed by the experiences of those who have been harmed by gambling, so that they can tangibly improve customer outcomes in future.

33



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If someone wants to play irresponsibly none of the measures in place go far enough to stop that.

RESPONDENT TO GAMBLING
ACT REVIEW SURVEY

Q7: What evidence is there from behavioural science or other fields that the protections which operators must already offer, such as player-set spend limits, could be made more effective in preventing harm?

There is a data gap here and therefore it is an area where detailed research would be beneficial. We believe that requiring operators to share data with the regulator about the impact and effectiveness of current measures would be a good starting point.

Section 2.1 of GamCare's Safer Gambling Standard states: *The Business's approach to safer gambling shall include collaboration with competitors and other organisations on the subject of preventing gambling-related harm. The Business shall also be able to show the results of outcomes (including successes and failures) in respect of measures tested/implemented aimed at minimising gambling-related harm.*

The [Revealing Reality report for GambleAware](#) is a good start and begins to identify issues and potential solutions for operators.

Q10: Is there any additional evidence in this area the government should consider?

We believe that the regulator should be resourced appropriately to understand, identify and monitor how new technology is being used by gambling operators, and the impact upon assurance processes. This is particularly important when it comes to preventing online harms.

We also believe that more can be done to educate those who might be at risk of harm about online gambling.



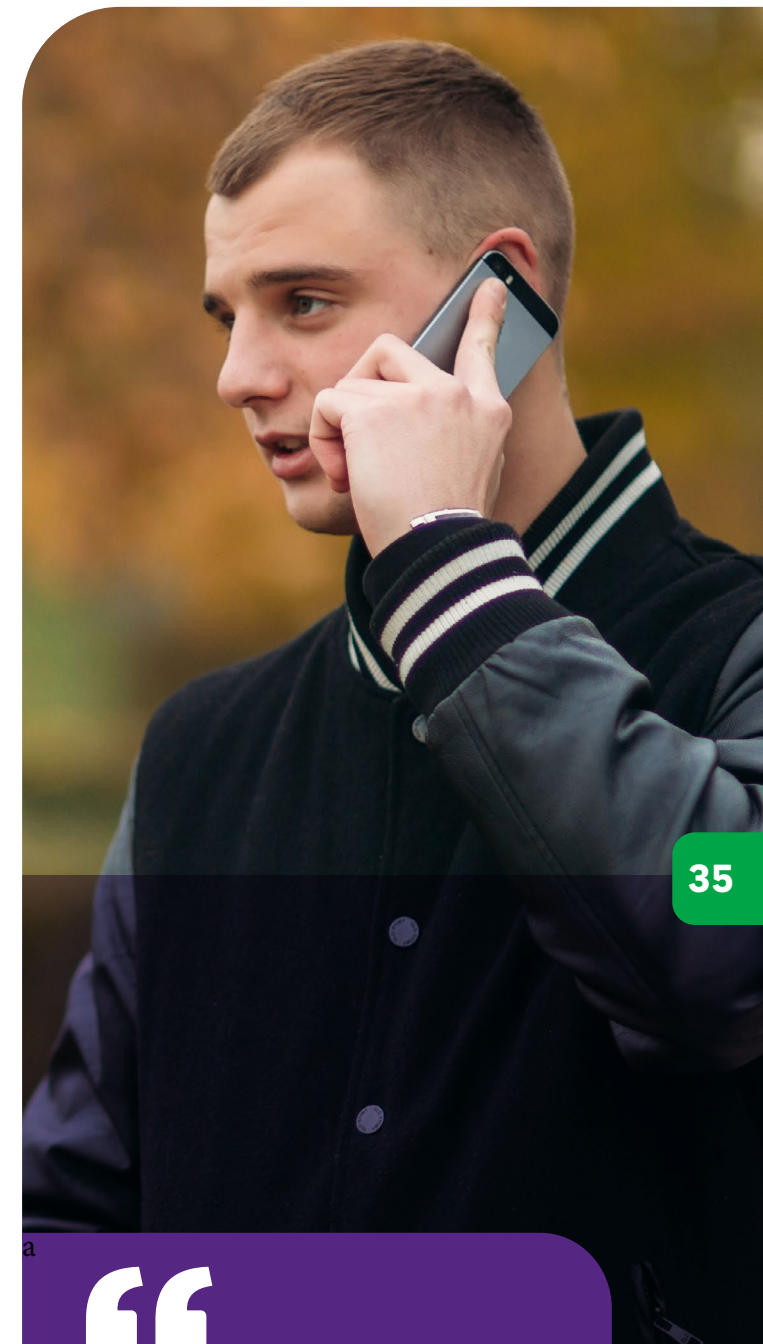
We know from our own Young People's Gambling Harm Prevention Programme (which targets young people and the professionals who educate and support them) that boosting teacher and education practitioner confidence is critical to successfully supporting young people who may be at risk from gambling harm from both their own gambling or that of a loved one such as a parent. Our evaluation programme has so far found:

- most professionals reported increased confidence regarding talking to all young people and young people with gambling problems about gambling and problem gambling and this increase in confidence was greater in 2018-19 (overall, 87% of respondents increased their confidence by the end of our training)
- an increased proportion of professionals felt confident to run sessions with young people, with greater increases in confidence seen in 2018-19.

Advertising, sponsorship and branding (Q11-15)

GamCare's position:

- We believe that adverts from licensed operators can and should be managed in such a way that they avoid visibility to children and young people and protect those who are more vulnerable to gambling harm.
- A recent GamCare survey showed that 80% of respondents wanted to see a ban on sports sponsorship, and even more (83%) wanted to see a ban on gambling sponsorship on football shirts. We believe that adverts could do more to recognise the potential risks of gambling.
- We know from our service users that the volume of advertising they are exposed to can be problematic for maintaining their recovery, and that the onus is currently on consumers to block access to gambling ads on each platform they visit if they wish not to be served with these.
- We also believe that advertising should routinely include educational messages and signposting to sources of support in a more consistent and helpful way for people to easily access the help and support they might need.
- VIP schemes have been cited by our audiences as something they have particular issues with and would like to see more done in this area. 82% of respondents to a recent GamCare survey would like to see VIP schemes banned altogether.
- We would like to see operators investing more heavily in their creative marketing of safer gambling tools, messaging, and signposting. Analysis of 'safer gambling materials' has shown them to be drab and lengthy compared with other adverts such as those offering bonuses for example.



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There is too much advertising and it's everywhere. I'm a recovering gambling addict and find it hard as it's always there reminding me.

RESPONDENT TO GAMBLING ACT REVIEW SURVEY

Q11: What are the benefits or harms caused by allowing licensed gambling operators to advertise?

We understand the desire for licensed operators to advertise. We believe that adverts from licenced operators can and should be managed in such a way that they avoid targeting children and young people and protect those who are more vulnerable to gambling harm. We also believe that advertising should include educational messages and signposting to sources of support in a more consistent and helpful way for people to easily access the help and support they might need.

We know from our callers and clients that the volume of advertising they are exposed to can be problematic for maintaining their recovery, and that the onus is currently on consumers/users to block access to gambling ads on each platform they visit if they wish not to be served with these.

Sports sponsorships from operators are of great concern to our audiences:

“Why should gambling companies be allowed to sponsor sports and be on football shirts? Other addictive and harmful products are not! Why do gambling?”

When we surveyed our audiences in February 2021, 93% of them told us that they felt there should be more regulation of gambling advertising, including sports sponsorship. Our audiences are concerned about the impact that sports advertising has on younger audiences:



More gambling advert regulation

Ability to block gambling advertising would help those most at risk

The majority of our users, and a broader cross-section of those with lived experience, would advocate for a central way to block gambling advertising if possible (e.g. a universal setting on devices, a block via Google, or a setting that would block ads in the gambling category on social media platforms such as Facebook and Twitter).

In a recent survey, in collaboration with the Gambling Commission, 71% of respondents mentioned that an option to ‘opt out’ of gambling advertising on online and/or social media platforms would be beneficial in reducing the negative effects of gambling harms. Subsequently, YouTube introduced an option to opt out of gambling advertising for users logged into the platform (December 2020).

The Gambling Commission is also working closely with Twitter and Facebook to allow users to limit gambling advertising, but many GamCare service users would like to see this work accelerate significantly. This would particularly help to protect young people but we recognise this would be complex to regulate.



It’s harmful and encourages people to gamble more. Especially the younger generation.

RESPONDENT TO GAMBLING ACT REVIEW SURVEY

Q12: What, if any, is the evidence on the effectiveness of mandatory safer gambling messages in adverts in preventing harm?

The key benefit of mandatory safer gambling messaging in adverts is that it offers a signpost to help for people experiencing harm.

A recent report on behavioural insights commissioned via GambleAware, found that:

- direct messaging interventions such as emails and SMS were generally ineffective in increasing the proportion of customers who made use of safer gambling tools such as deposit limits and session time reminders. Alternative forms of intervention such as social media campaigns and a revised sign-up process aimed at increasing salience of safer gambling tools did greatly increase take up of reality checks and deposit limits respectively;
- there were no effects of the interventions (emails or SMS) on bottom-line outcomes such as total amount deposited or total play time. This holds both as an overall estimate and when we specifically consider the group of people who changed their behaviour as a result of the interventions;
- there is some evidence that safer gambling messaging, particularly on social media, can be useful as a marketing tool and as an effective way of engaging with customers and potential customers, aside from any safer gambling benefits.

One operator found that their safer gambling material on Instagram and Facebook received more engagement on social media than any of their other recent content. Another operator observed a significant increase in the number of customers setting timed session reminders following a social media awareness campaign.

Q13: What evidence is there on the harms or benefits of licensed operators being able to make promotional offers, such as free spins, bonuses and hospitality, either within or separately to VIP schemes?

We know that those with gambling problems often feel isolated and cut off from their friends and family. One of the great dangers of VIP schemes and hospitality is that the scheme offers a social setting where they can connect with relationship managers and others who gamble thereby normalising high levels of spending which reinforce feelings of isolation from friends and family by creating an entirely new social circle.

The latest [guidance from the Gambling Commission](#) launched on the 31st October 2020, requires all operators to take steps to ensure greater protections for those entering VIP schemes (designed to reward high paying and regularly returning customers with rewards such as free bets, cash back, sporting event tickets and other prizes).

Our audiences tell us more should be done on VIP schemes. We recently asked our audiences if they felt that VIP schemes should be banned and 82% said yes. It is clearly something that our audiences want addressed.



The VIP scheme was the killer for me. Keeping up with a trend to stay as a VIP and get perks.

RESPONDENT TO GAMBLING ACT REVIEW SURVEY

Q14: What is the positive or negative impact of gambling sponsorship arrangements across sports, esports and other areas?

Many of our service users tell us that they find the sheer volume of gambling advertisements that they encounter across sports, esports and beyond is problematic and a potential hindrance to their recovery, especially when trying to remain gamble-free. Many reference feeling 'bombarded' by gambling advertising, both on- and off-line.

Our recent survey found that 80% of respondents were in favour of banning gambling companies from sponsoring sports activities, and this rose to 83% of respondents when asked specifically about banning sponsorship of football shirts. 82% of respondents wanted to see an end to VIP schemes, which are often closely associated with sporting activities.

Q15: Is there any additional evidence in this area the government should consider, including in relation to particularly vulnerable groups?

We believe that this is an area where it is particularly important to consider the views of people with lived experience of gambling harm. We know young people can be particularly affected by advertising and endorsements.



There is significant evidence to suggest that socio-economic factors play a role in determining whether someone is vulnerable to gambling harm.

A [recent study](#) from GambleAware shows that those from poorer areas are more likely to use (and lose) and place risky long odds bets. It showed that residents in the 10% most deprived areas held 11.7% of accounts and those who lived in the 10% least deprived areas held 8.2% of the accounts.

More frequent research is needed to understand why some groups are particularly vulnerable to gambling harm, as well as how newer marketing practices impact young people. The impact of celebrity endorsements and influencer marketing on young people is yet to be fully understood. We know anecdotally from our youth outreach work that this sort of marketing can be very impactful for young people. We believe that this is an issue to which the Advertising Standards Authority should give particular consideration.

The GambleAware [Treatment Needs and Gap Analysis in Great Britain \(2020\)](#), summarised the demographic groups most likely to be classified as gamblers experiencing some level of harm were men, younger adults, BAME adults, and adults from a lower socio-economic background.

These audiences broadly correlate with GamCare's current service users, with the majority of our callers being male (65% in 2019/20), and the most common age group being 26-35 (six out of ten callers in 2019/20). The trends are similar across the UK.

In Scotland, data shows that men are more likely to experience gambling harm than women (1.4% versus 0.2%), and that young men in particular are more likely to be classified as problem gamblers, with young men aged 16-24 experiencing the highest rates of harm (1.6%) those aged 25-34 closely behind (1.5%). There was also evidence to suggest that those from lower socioeconomic

backgrounds were more likely to experience gambling harm, with prevalence in the most deprived areas at 1.5% compared with 0.5% in the least deprived. In Wales, data from the Chief Medical Officer's report [Gambling with our Health](#) shows that 8.6% of the most deprived socio-economic quartile bet more than they can afford, compared with 1.6% in the least deprived quartile. In that same quartile, 2.1% were classified as problem gamblers, compared with 0.2% from the least deprived quartile.

There is also a need to conduct greater research on the prevalence and impact of gambling in groups where harmful gambling seems to be increasing, for example BAME women. Data from our Helpline shows that the number of gamblers identifying as female contacting our services has risen at more than twice the rate of men, from 2,303 in 2015 to 3,109 in 2019. 35% of callers to the Helpline in 2019/20 identified as female. Data from our treatment research of particular concern is the overrepresentation of BAME women in the 'high risk' category. GambleAware found that 35% of female gamblers in the UK with high levels of harm came from a BAME background, compared to just 12% of the overall female population. This research is recent, meaning the reasons why BAME women may be more prone to gamble are not yet known, however findings from other countries may provide some insight.

We know that people frequently don't seek help until they are in crisis, reflected in the fact that their needs on entering treatment are significant. We need to reach people earlier, and in greater numbers, which is why safer gambling messaging, educating operators about prevention and general public education is so important. We know that treatment is highly effective, more than 70% of service users complete their agreed course of treatment and experience significant quality of life improvements and reduced gambling at the end of their treatment.

Gambling Commission's powers and resources (Q16-24)

GamCare's position:

- We believe that there is a need to more clearly define specific social responsibility objectives, targets and metrics around safer gambling for the Gambling Commission. This would help to set a clear focus and direction of the environment we are aiming for. We would recommend that the Gambling Commission set these objectives and targets in consultation with GamCare and our delivery partners.



The Gambling Commission needs more powers for consumer redress and more capacity to regulate the industry.

RESPONDENT TO GAMBLING ACT REVIEW SURVEY

- We believe that a strong, properly resourced expert regulator is in everyone's interest. The Gambling Commission does not appear to be resourced to regulate such a fast moving industry and their funding should reflect the scale of the sector and the challenge of regulating such a fast-moving environment.

- We support the creation of clear evidenced-based targets for the reduction of gambling related harm that both the gambling industry and those, like GamCare who are involved in education and treatment, can work towards.
- We are clear that the levelling up of funding for gambling education and treatment is necessary but our key focus is our service users. Increased funding that leads to better outcomes for people experiencing gambling harm matter more than how that funding is structured.
- We believe our Safer Gambling Standard is a way in which consumers can make informed decisions on gambling businesses that have evidenced high standards of customer protection. We see this as complementary to the existing licensing measures that the Gambling Commission deploys. We encourage the regulator support the Safer Gambling Standard as a method of raising standards in the gambling industry and achieving better outcomes for consumers who can gamble more safely with accredited gambling businesses.

Q18: How easy is it for consumers to tell that they are using an unlicensed illegal operator?

It is often very hard for a consumer to know if they are using an unlicensed illegal operator. Alongside education, the adoption of a quality mark like the Safer Gambling Standard could help consumers identify reputable, regulated providers. Quality standards exist in many areas such as food hygiene, recycling and fairtrade. Such standards can be important tools in raising consumer awareness of businesses that seek to adopt high standards of social responsibility and/or consumer protection.

Q19: Is there evidence on whether the Gambling Commission has sufficient investigation, enforcement and sanctioning powers to effect change in operator behaviour and raise standards?

A strong properly resourced expert regulator is in everyone's interest. The Gambling Commission is not currently resourced to regulate such a fast-moving industry. We support allowing the Gambling Commission to increase its fees to reflect the complexity of the gambling industry, and the fast evolving digital landscape that it must navigate.

Any regulator has limited resources and as such should regulate on the basis of risk. If a licensed gambling business has achieved the [Safer Gambling Standard](#) the regulator could give greater recognition to this in how it assesses compliance in such businesses. This could include adopting lighter touch regulation with such businesses and not duplicating its safer gambling related compliance assessment efforts which could be better focused on gambling businesses which present a higher risk, such as unlicensed businesses. A lighter touch approach from the regulator could also be a feature which attracts more gambling businesses to be assessed against the Safer Gambling Standard, which is a Standard that recognises gambling businesses that go beyond meeting base social responsibility related regulatory requirements.

The Business to Consumer (B2C) version of the Standard sets out ten areas which form the foundation for a safer gambling environment.

1. Corporate governance and risk management
2. Collaboration and sharing best practice
3. Spend on safer gambling including the most recent percentage annual Gross Gambling Yield (GGY) contribution to organisation(s) that undertake research, prevention, and treatment on the subject of gambling-related harm.
4. Protection of children and young adults
5. Customer information, profiling and interaction, and additional controls for vulnerable and high value customers
6. Product design and innovation in safer gambling tools, and the deployment of products in environments which minimise the risk of customers experiencing gambling-related harm
7. Self-exclusion
8. Advertising and promotion
9. Staff training and development
10. Addressing problem gambling amongst staff

Businesses applying for accreditation must demonstrate that they comply with a number of criteria within each area, and are scored accordingly to achieve one of four levels of accreditation.

The Business to Business (B2B) version of the Standard sets out eight areas which form the basis of a safer gambling environment.

1. Corporate governance and risk management
2. Collaboration and sharing best practice
3. Business spend on safer gambling including the most recent annual percentage of gross profit contribution to organisation(s) that undertake research, prevention and treatment on the subject of gambling-related harm
4. Consumer Information
5. Product design and innovation in safer gambling tools, and the deployment of products in environments which minimise the risk of consumers experiencing gambling-related harm
6. Advertising and promotion
7. Staff training and development
8. Addressing problem gambling amongst staff

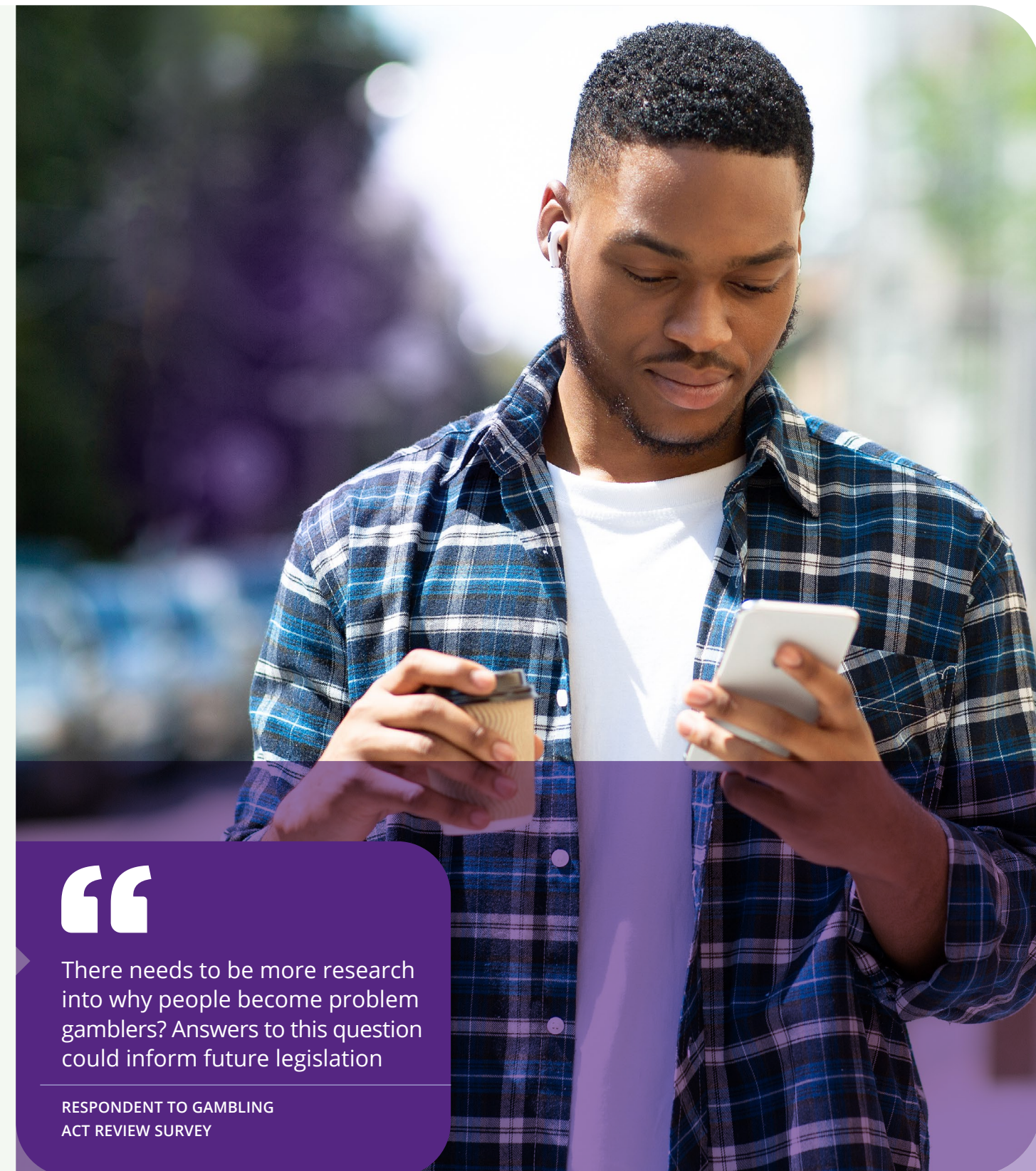
Gambling businesses that have achieved the Safer Gambling Standard have evidenced high standards of customer protection. The regulator could give gambling businesses some recognition for achieving the Standard. This would encourage more gambling businesses to improve their approaches to safer gambling so they are in a position to undertake the Standard assessment and be successful in receiving accreditation against the Standard. It would also allow customers to make informed decisions about where they spend their money.

Q22: What are the barriers to high quality research to inform regulation or policy making, and how can these be overcome? What evidence is there that a different model to the current system might improve outcomes?

The funds raised for research, education and treatment from voluntary industry contributions still fall significantly short of the amount required to fully discharge the requirements of the National Strategy to Reduce Gambling Harms.

There are a lot of organisations seeking to identify key impacts of gambling harm but we need this to be aggregated in a way that gives all those working to support those experiencing from gambling harm targets to work towards.

Whilst GamCare makes our data sets and other information available to researchers, this discipline needs an entirely separate set of funding arrangements to ensure its integrity and independence.



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There needs to be more research into why people become problem gamblers? Answers to this question could inform future legislation

RESPONDENT TO GAMBLING
ACT REVIEW SURVEY

Consumer Redress (Q25-28)

GamCare's position:

- We support a well-run compliant industry with an Ombudsman that offers a fair and expeditious resolution of complaints in an impartial, confidential and independent manner.
- We believe that there are a number of Ombudsman models that currently work well in other sectors and we are committed to cooperating with the Government on how redress arrangements could be managed in a way that puts customers at their heart.
- We hear from individuals who would seek recourse against gambling operators if there were an Ombudsman and clear process in place. We believe that a lack of recourse to challenge the industry can cause emotional distress and affect an individual's recovery.

“

An Ombudsman is needed.

RESPONDENT TO GAMBLING
ACT REVIEW SURVEY



Q25: Is there evidence of a need to change redress arrangements in the gambling sector?

Much of the recent debate amongst people with an interest in gambling has centred on whether there is a need for an Ombudsman for the gambling industry. We believe that a well-run, compliant industry has nothing to fear from a body that offers a fair and expeditious resolution of complaints in an impartial, confidential and independent manner.

There is some evidence from our recent survey that the current system is confusing and poorly understood. 61% of the people we surveyed were unclear about how the system works. Of those that had used it, many felt frustrated:



Unclear how the system works

'It was infuriating. I complained about a business, the response was to complain to the business in writing which is the procedure, so I did that. The business came back and said they did nothing wrong, so I escalated it as per the procedure and the commission said there was nothing they could do for me as it either wasn't under their jurisdiction or did not have the power to look into it further. I do remember feeling incredibly disheartened. I plucked up the courage a few years later to reinstate the complaint with the company (after they had been fined for lack of protection for players) and was able to receive compensation.'

We would support further exploration of this issue, with service user voices reflected in system design and robust consideration of evidence to guard against unintended consequences that could further harm those already impacted by gambling harm.

We would also like to see the industry take greater responsibility for signposting customers to redress arrangements as is standard practice in other industries.

Q27: Individual redress is often equated with financial compensation for gambling losses. However, there may be risks associated with providing financial lump sums to problem and recovering gamblers, or risks of creating a sense that gambling can be 'risk free'. Are there other such considerations the government should weigh in considering possible changes to redress arrangements?

First and foremost the need for redress should be reduced through a well resourced regulator, better adherence to the Licensing Conditions and Codes of Practice, and our Safer Gambling Standard. If redress is required then a more transparent process for customers is needed. We agree that there could be problems associated with providing financial lump sums to those in recovery.

“

I realised that my gambling was out of my control now, there was no excuse anymore. I also realised that even if someone had handed me money to pay my debts, I wouldn't.

GAMCARE CASE STUDY 2020

Age limits and verification (Q29-38)

GamCare's position:

- We support increased protections for all vulnerable groups, particularly young people. Our Safer Gambling Standard sets out best practice in relation to protecting young people. We believe that there is a case for tightening advertising protections for children and young people.
- Data from the National Gambling Treatment Service tells us that on average gamblers reported problem gambling starting by the age of 24 years with problems surfacing later. Three quarters reported problem gambling starting by the age of 32 years and one quarter by the age of 19 years. As many as 61% cited an early win as the catalyst for their gambling problems so it's clear that education and outreach is needed to ensure that we protect young adults from these experiences.



Problem gambling starting

- We support a raising of the age for National Lottery play to 18.

Q31: What, if any, evidence is there on the number of 16 and 17 year olds participating in society lotteries?

We are not aware of significant evidence, but there is a significant data gap on the impact on children and young people of all forms of gambling. This is an area that merits further research.

We offer support and treatment to all ages. While we currently receive a relatively low number of calls from under 18s, the majority disclose issues with scratchcards.

Q36: What, if any, is the evidence that extra protections are needed for the youngest adults (for instance those aged between 18 and 25)?

Data from the National Gambling Treatment Service tells us that on average gamblers reported problem gambling starting by the age of 24 years. Three quarters reported problem gambling starting by the age of 32 years and one quarter by the age of 19 years. It is vital that we both educate and support young people about the potential harm of gambling.

According to [Forrest and McHale \(2018\)](#), a significant number of new cases of gambling problems develop at ages 18, 19, 20, the period when young people first have legal access to most forms of commercial gambling.



“

I feel that age limits are very important for the younger generation to be protected from the effects of problem gambling.

RESPONDENT TO THE GAMBLING ACT REVIEW SURVEY

We at GamCare run the Young People's Gambling Harm Prevention Programme in collaboration with YGAM. Since 2017 GamCare has trained 10,000 professionals and 22,000 young people. We also run the [BigDeal](#) website that encourages young people to talk about and learn more about the potential harm of gambling but also to reach out to us if they need help.

In our Safer Gambling Standard, we specify that gambling businesses should implement more stringent criteria relating to risk indicators for customers between the ages of 18 and 21 (16 and 21 for lotteries) and demonstrate how such indicators are used in minimising gambling-related harm to this age group. This could include reducing or stopping push marketing messages for this age range, better affordability checks, and ensuring that staff are skilled to provide earlier interventions and more regular interactions for younger customers.

There is also increasing evidence that online advertising is particularly engaging and attractive to young people¹²³. Professor Agnes Nairn recently wrote for the Royal Society for Public Health about her research for the University of Bristol into the ethics of marketing and advertising to children⁴. Her research found that children and young people are more likely to share social media gambling adverts than any other age group. Her study looked at 166,969 Twitter accounts which shared organic gambling adverts from operators. The study found that 28% of the shares came from users who were under-16 and a further 66% came from users aged 16-23.



¹ [The effect of gambling advertising on children, young people and vulnerable adults | Ipsos MORI](#)

² [Reducing-the-Odds-an-Education-Pilot-to-Prevent-Gambling-Harm.pdf \(wpengine.com\)](#)

³ <https://demos.co.uk/press-release/over-a-quarter-of-those-engaging-with-esports-betting-tweets-in-the-uk-are-children/>

⁴ <https://research-information.bris.ac.uk/en/projects/the-impact-of-gambling-advertising-on-children-young-people-and-t>
<https://www.rsph.org.uk/about-us/news/guest-blog-hey-have-you-seen-this-great-gambling-advert.html>

A recent study by the Royal Society for Public Health and Gaming Health *Alliance, Skins in the Game*⁵, found that:

- 15% of young gamers had taken money from their parents without their permission to buy loot boxes. (Loot boxes are virtual treasure chests containing undisclosed items that can be used in games. These might be ways of customising characters or weapons ('skins'). These contents may affect progress through the game, or simply be designed to convey status)
- 11% had used their parents' credit or debit card to fund their loot box purchases
- 9% had borrowed money they couldn't repay to spend on loot boxes.

This suggests that young people are encouraging their peers to engage with gambling-like behaviours. We hope that the Gambling Act Review will result in action to address this issue so that young people, including gamers, continue to receive adequate regulatory protection from ever increasingly high-risk activities. We would also suggest that advertising protection for young people should be reviewed by the Advertising Standards Authority, as described earlier in our responses to the advertising section of the Review.

Q37: What evidence is there on the type of protections which might be most effective for this age group?

We believe that our [Safer Gambling Standard](#) sets out best practice for protecting children and young people. Under the Standard operators are required to implement more stringent criteria relating to risk indicators for customers between the ages of 18 and 21 and demonstrate how such indicators are used in minimising gambling-related harm to this age group.

For example, ensuring that more stringent criteria relating to risk indicators are applied from the point that the customer signs up, offering lower time and/or spend limits as standard and ensuring staff are trained to deliver appropriate interactions at an earlier stage with customers in this age group.

Online, this might also include limiting direct marketing and push marketing messages, and applying advertisement blocking or obtaining information at an earlier stage where the customer's level or patterns of gambling identify an increased level of risk.

⁵ <https://www.rsph.org.uk/our-work/policy/gambling/skins-in-the-game.html>



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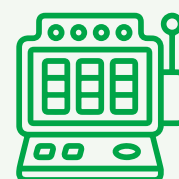
Don't just concentrate with online. Land-based operators need reviewing too.

RESPONDENT TO THE GAMBLING ACT REVIEW SURVEY

Land-based gambling (Q39-45)

GamCare's position:

- Nearly half of all those who come to GamCare for help cite issues with land-based gambling (46%).
- Although latest economic and world events have seen the rapid closure of many land-based gambling venues we expect issues with these to persist as we come out of lockdown.



46%

Land-based gambling

- Gamblers contacting us generally have multiple accounts across both land-based and online settings - according to data from the [Gambling Commission \(2019\)](#), gamblers have three accounts with online gambling operators on average. It is therefore critical that regulation is integrated across online and land-based settings.
- We recognise that there has been rapid development in self-exclusion methods for online gambling.

We know from our services users that there are significant inconsistencies in how self-exclusion methods operate in practice in land-based settings. There are three different systems for arcades, casinos and betting shops.

They are set in geographically limited areas, and enforcement relies on manual in-person checks. The system, as it stands, creates multiple loopholes and limited protection for someone with a compulsion to gamble.

- It is important that risk assessments are carried out when considering licences for land-based gambling with clear guidance on what is expected of the operator so we don't continue to see a proliferation of land based gambling venues in poorer areas.

Q40: What evidence is there of potential benefits or harms of permitting cashless payment for land-based gambling?

Without a requirement that anyone using cashless payments should be subject to the same level of control as players gambling online, there is a significant chance that risk could be increased.

Reducing the friction in the transaction increases the speed of play and reduces player's cooling-off time, both of which are factors associated with greater risks. We would call for the same safeguards to be implemented in a cashless environment.

For customers who are struggling with gambling, creating 'friction' is an important way of helping them control their gambling.

In our [Financial Harm Toolkit](#) we set out in more detail how operators, financial institutions and customers can work together to introduce safeguards.

The toolkit contains core customer messaging, referral pathway guidelines tailored to each sector, and guidance on training staff to give them confidence to support customers who are impacted by gambling harms. Together, these resources can help frontline staff in key industries provide effective, sensitive support to customers and ensure they receive the help they need.

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