

DEMOS

SAFER BY DESIGN

HOW CAN
COLLABORATION
HELP DESIGN
SAFER GAMBLING?

AMELIA STEWART
JOSH SMITH

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15 Whitehall, London, SW1A 2DD
T: 020 3878 3955
hello@demos.co.uk
www.demos.co.uk

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Amelia Stewart and Josh Smith

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INTRODUCTION

Between the review of the 2005 Gambling Act, the House of Lords Select Committee report, and Public Health England's call for gambling harm to be recognised as a public health issue, the question of safety in gambling products is coming under increasing scrutiny. This discussion is taking place against a backdrop of major changes; both to the availability of gambling to a population spending increasing amounts of time in digital spaces, and the type of products they are accessing - not only to bet, but to play games, engage with social media and speculate on cryptocurrencies, amongst other things. Alongside their role as entertainment, all of these activities have the potential to encourage unhealthy behaviour, and blur the boundaries of what constitutes gambling.

It is now more urgent than ever that we create spaces where academics, policymakers and gambling industry can collaborate with treatment providers and those with lived experience of addiction to make gambling safer. The conversation around gambling has too often been politicised and divided, making it difficult to share insights between all interested parties. This is detrimental to reducing gambling-related harm, which should be everyone's shared goal.

To promote this vital conversation, Demos held two roundtables with Playtech, one of the largest suppliers of gambling products in the world, bringing together the gambling industry with academics, policymakers and charity experts. These roundtables opened with operators declaring there was an "appetite for change" in the gambling industry, while those outside the industry were largely in agreement about the benefits of partnering with operators.

From these discussions, we found a strong consensus on many key fronts: the need to more effectively share data on gambling, the need to trial theory in practise before implementing it, and the need to recognise problem gambling as a health issue. This short report outlines those discussions.

THE FIVE MAIN THEMES THAT AROSE FROM THESE ROUNDTABLES WERE:

1. Implementing research in the real world.
2. Encouraging users to take up safer gambling tools.
3. Re-examining what it means to gamble.
4. Furthering collaboration between industry, regulators, academia and other third party sectors.
5. Creating wraparound healthcare for gambling support.

THE ROUNDTABLES AN OVERVIEW

Partnering with Playtech, Demos hosted two roundtables which brought together those in the industry with gambling experts from academia, charities and policy. Both conversations were centred on minimising harm in gambling products. The first looked at the role policy and regulation can play, and sought ideas and input on how the gambling sector could learn from other areas, including digital wellbeing and digital resilience. The second looked at gambling as a health issue, and how stakeholders might draw on progress made in other areas such as digital resilience and wellbeing.

Our first roundtable focused on the role all stakeholders should play in setting standards for gambling products and how they can be developed. Attendees brought up the need to create a standardised, centralised and holistic system for sharing data, and the barriers to doing so. Experts also discussed how regulators should balance harm reduction with consumer choice, with some arguing that consumer surplus is an overlooked area of gambling research.

Our second roundtable looked at building digital resilience and the intersection between mental health issues and problem gambling. Many saw digital resilience as a skill that could be taught, and there was consensus that early intervention is key to avoiding chronic, long-term gambling issues, in addition to guarding against other addictive and risky behaviours. Experts also discussed the need for a connected systems approach to care – in particular to break the vicious cycle of mental health issues and problem gambling, where gambling is often a symptom of a wider struggle which worsens the root problem.

FIVE KEY TAKEAWAYS

1. How can we effectively implement theoretical research in reality?

A point raised in both roundtables was the challenge of turning theoretical research into effective policy to minimise harms. Given that what works in theory has not always worked in practice; hypothesising, trialling research on a small scale, and asking for feedback from product users, as well as other stakeholders, is key to ensuring that good research produces good outcomes.

Central to the issue of applicability is asking who any solution is designed to help. Gambling users were described as divided into three groups: a majority who do not experience problems with gambling and two minority groups of people who are either at risk of experiencing harm or struggling with serious gambling issues. This minority is significant - 60% of the UK gambling industry's profits come from those who are problem gamblers, or at risk of becoming so.¹ When implementing research intended to protect customers, policymakers and the industry need to consider who exactly these changes seek to help, how they will help them and how it will affect the other two groups. Personalisation could play a useful role here, with platforms that recognise potentially problematic playing flagging this to the user, offering advice and links to addiction support, or even blocking their access to gambling.

Finally, to build a fuller picture of gambling harms, studies need to look at the consumer surplus of gambling. Examining both positive and problematic play is essential to building a better picture of gambling harms and to forming more compelling and holistic regulations and recommendations.

¹ UK Parliament. Time to act to reduce gambling-related harm, says Lords Report. UK Parliament, July 2020. Available at: <https://www.parliament.uk/business/lords/media-centre/house-of-lords-media-notice/2020/jul-20/time-to-act-to-reduce-gambling-related-harm-says-lords-report/>

2. How can we help people using gambling products engage with safer gambling tools and use them more effectively?

Support and tools for gamblers are only as useful as they are accessible. Advice aimed at gamblers needs to use a common language that can be understood by users; likewise, safer gambling tools (such as deposit limits) need to be simple and accessible, without any friction to using them. The goal should be to increase uptake of safer gambling tools by making them as easy to use as gambling itself: currently, when limits or tools are voluntary, only 2-10% of players use them.²

These tools should be front and centre on gambling sites. 'Nudge' techniques to increase uptake have proved useful, such as designing a deposit limit with a dropdown menu for relatively low limits, and adding friction to setting higher limits by making the user type them in. Negative messages have proved relatively ineffective at persuading people to gamble more safely, so developers should consider a more positive approach which rewards players for gambling responsibly.

Finally, our roundtables highlighted a tension between promoting 'safer gambling' while also acknowledging that 'safe gambling' may not be possible for a substantial segment of the population. Although a small minority of those using gambling products at any time will have a serious gambling problem, research conducted by Mind in 2017 suggested that around 25% of people in the UK will experience a mental health problem over the course of any year, and the number is higher over a lifetime.³ Canada's Lower-Risk Gambling Guidelines now recommend that those with a history of depression, anxiety, substance abuse or family history of gambling problems should consider not gambling altogether.⁴

3. How should we define harmful gambling in a rapidly evolving digital world?

Both focus groups brought up the need to redefine key terms - such as gambling, digital resilience and online harms - in the context of a rapidly evolving digital landscape. This is echoed in the Government's

description of the 2005 Gambling Act, labelling it an "analogue law in a digital age".⁵ Our definitions of these terms have not kept pace with reality: the term 'digital harms', for example, is usually focused on social media and discussions often overlook online gambling. On the flip side, we also need to assess online gambling from a 'digital wellbeing' angle, as for some users, it partly falls into the category of pleasure and entertainment.

Participants flagged the need to look further into reclassifying gambling, to widen its scope to include elements within products such as gaming and cryptocurrency trading. This is especially important because these addictive behaviours are transferable: out of control gambling could, for example, spill over into out of control social media use or gaming. Parents and teachers are increasingly concerned about their children being "groomed" for gambling through gaming with in-game gambling style mechanics. There is a particular concern around lootboxes - where players pay for, or earn through play, 'boxes' of randomised items or 'loot' that they can use in their game.⁶ These are common in games younger users play, and often fall outside of the legal definition of gambling, avoiding regulation.

A connected effort, then, is needed from both the gaming and gambling industries to tackle underage gambling head-on, acknowledging that gambling-style mechanics within younger players' games need proper regulation. Efforts should be redoubled to stop underage gambling while offering tailored support to under-18s struggling with problem gambling.

4. How can industry, policymakers, charity workers and academics effectively collaborate?

Both roundtables highlighted the need to create strong links between academics, policymakers and gambling operators, with the goal of building a shared data set to facilitate high-quality research on safer gambling. A major barrier to transparent data sharing is the lack of a standardised and centralised system across operators, academic institutions and other third party organisations. This is compounded by difficulties around user consent procedures and ensuring that data is used to better protect users,

² Gambling Commission. Gambling participation in 2019: behaviour, awareness and attitudes. Gambling Commission, February 2020. Available at <https://assets.ctfassets.net/j16ev64qyf6l/7ulxjm1SNQMygdOFV2bzxN/ea74db1104925f015edb11db0596f98b/Gambling-participation-in-2019-behaviour-awareness-and-attitudes.pdf>

³ Mind. Mental health facts and statistics. Mind, 2017. Available at [statistics-facts-2017.pdf](https://www.mind.org.uk/about-us/facts-and-statistics) (mind.org.uk)

⁴ LLRG. The Lower-Risk Gambling Guidelines. LLRG, 2021. Available at <https://gamblingguidelines.ca/>

⁵ DCMS, Huddleston, M. and Dowden, O. Government launches review to ensure gambling laws are fit for digital age. UK Government, December 2020. Available at: <https://www.gov.uk/government/news/government-launches-review-to-ensure-gambling-laws-are-fit-for-digital-age>

⁶ DCMS. Loot boxes in video games - call for evidence. UK Government, September 2020. Available at <https://www.gov.uk/government/consultations/loot-boxes-in-video-games-call-for-evidence>

as well as technological and logistical difficulties associated with aggregating data from different operators. Finally, researchers need to ensure that published research on vulnerable gamblers does not inadvertently create a 'handbook' for exploiting these users.

While there are genuine difficulties, there are different models from other sectors where industry and academics have collaborated to overcome these challenges. The social media world has also faced similar challenges to building a shared data set, where researchers have historically been blocked from accessing the data that social media companies hold. This is not just a problem in gambling; this forms a huge part of the online safety debate and we need to come up with comprehensive solutions for all areas of online harms that require data sharing. However, there is precedence for overcoming this: the UK pharmaceutical sector has worked closely with regulators and government to set up independent standards for sharing data. Not only has this benefited patients by speeding up the research process, but it has improved the public perception of the pharmaceutical industry.

Participants also argued that those on the periphery of the industry have an important role to play in identifying users that might be at-risk and being able to offer support or signpost organisations that can help. Now that many gamblers have separate wallets and multiple bank accounts, it is harder for researchers to track the financial impact of their gambling. Equally, without this fuller picture of players' financial situation, it is difficult to understand which players have the most chronic gambling problems, as those spending the most on gambling sites are not necessarily the most financially damaged. As such, the industry, academics and charities should build on the work that the GamCare Related Financial Harm project has done to facilitate collaboration between banking, gambling and debt relief centres.

5. How can we better integrate gambling support services with industry?

Consistency across gambling platforms is key to protecting vulnerable users, where tools, safety nets, support and regulation should be familiar and cohesive across all spaces. Those in the industry should work together for fuller integration with support services so that players struggling with gambling can easily use gambling blocks and other tools that apply across all platforms. Without this level of integration, many people struggling with addiction who take steps to opt out still risk being targeted with advertising and notifications from operators online, including those offering a way

around self-exclusion schemes such as Gamstop.

Others argued that in order to offer comprehensive help to those struggling, the industry needs to take a systems approach to collaborate with the Government, and in particular, the healthcare sector. There are comorbidities associated with gambling, such as gaming, drugs, alcohol and social media addiction. Problem gambling is very often a symptom of other mental health problems, where those struggling are stuck in a negative cycle of social isolation and low mood, leading to ever more harmful gambling. Yet while the research clearly shows the strong link between gambling problems and other mental health problems, users still struggle to make this connection and often only reach out for help when the problem is already chronic.

In instances where gambling problems are more acute, there are also barriers stopping people from seeking out stronger intervention. Beyond the stigma attached to gambling addiction - exacerbated by terms like 'problem gambler,' that implicitly put the blame on the user - there is a lack of awareness about the strong links between debt, gambling and mental health. Missing this link can often result in those who are struggling losing out on early intervention which could be critical to minimising the chance of the problem becoming chronic. Those involved in harm reduction must also tackle the additional barriers female gamblers face, which include greater stigma, being put off from seeking out help at treatment centres dominated by men, and being unable to take time off from childcare for longer-term residential treatment. Treatment centred around supporting male gambling addiction may also overlook the nuances of female gambling addiction, which often stems from financial abuse. Underage gamblers are also especially vulnerable because research suggests that the repetitive nature of gambling means that it is an addiction comparable to that of alcohol or cannabis, which are damaging for the developing brain.

The problem with receiving delayed treatment does not just lie with users; others at the roundtables argued that the system for gambling support in the UK is not fully integrated, and people find help by luck rather than design. The industry, gambling support and healthcare providers need closer integration so that users can be passed between services as the issues they struggle with are often multifaceted. Any conversation around integration also needs to acknowledge the need for multi-level entry points to gambling support, where some users need low levels of education while others struggling with a chronic problem need intensive treatment.

WHAT'S NEXT?

1. Begin creating a gambling data set shared between academics, policymakers, charities and government managed by a trusted body.

The first step is bringing together all stakeholders in the same room to build consensus, increase trust, and recognise that it is in everyone's interests to work more collaboratively. From this, the industry needs to create a standardised and centralised system for data sharing across operators, government, academic institutions and other third party organisations, where regulators set up independent standards for this data sharing. This data could be invaluable in improving research and policy around gambling harms.

2. Work towards closer integration between gambling platforms and regulators.

Industry and regulators need to work closely together to take a holistic, systems-based approach to ensure that the tools and safety nets on sites are standardised, easily accessible and understandable. This will involve working with advertising providers. One urgent issue highlighted at the roundtables was ensuring that users can easily opt out of all gambling advertising and alerts with one click. This will require the industry and regulators to work with advertising providers to develop a more effective solution.

3. Work towards closer integration between gambling support services and the healthcare system.

Problem gambling is a health issue, both in itself, and because it is closely tied to other mental health issues such as drug and alcohol addiction, and depression. As such, we need wraparound healthcare with stronger links between the NHS and gambling operators. This should aim to provide more preventative care, quickly alerting those struggling with the early symptoms of gambling issues, as well

as offering more immediate intervention for those suffering acutely. Given that the NHS's Long Term Plan published 2019 found that over 400,000 people in the UK have gambling problems, healthcare professionals should warn those with underlying conditions (such as depression) to consider not gambling altogether.

4. Undertake further research into the consumer surplus of gambling as part of assessing gambling harms.

Policymakers cannot effectively build a comprehensive strategy for protecting vulnerable users without looking at the entertainment or pleasure some users derive from gambling. As such, more research is needed into consumer surplus in conjunction with consumer harms in order to paint a fuller picture. Any regulation around gambling should also recognise the U-shaped curve of regulation versus social harms, where harms are very high when regulation is too high or too low. As much as is possible, regulation should allow people to enjoy the entertainment they derive from gambling safely, while removing the harmful elements. However, this is complicated because the 'entertainment' and 'harm' sides are clearly intertwined and different for each individual.

5. Use progress made in harm reduction in gambling as a blueprint for harm reduction in other areas.

The progress made in gambling harm reduction policy could serve as a blueprint for harm reduction in other areas online where there are less widely recognised behavioural addictions, such as gaming and social media. This is also essential to strengthening harm reduction policy in gambling as addictions often intersect many different areas, requiring a multi-pronged approach.

FINAL THOUGHTS

The best harm reduction strategies require collaboration between those inside the industry and those outside of it. To enable cooperation and effectively connect work which is underway, new bonds of trust will need to be built up between stakeholders. Some progress in this area has already been made with GamCare's Gambling Related Financial Harm initiative, which brings together the gambling industry with academics and regulators, and also involves those key players on the periphery of gambling harms, such as banks and debt advice organisations. We hope this report goes some way to showing how, by utilising the expertise and cooperation of industry, regulators, government, charities, policymakers, academics and all other interested parties, the safety gambling products could effectively be improved.

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15 WHITEHALL, LONDON, SW1A 2DD

T: 020 3878 3955

HELLO@DEMOS.CO.UK

WWW.DEMOS.CO.UK