

27th April 2018

Dear Tom Watson MP,

Please find below a short response to the Labour party review of NHS treatment of gambling addiction from the Money and Mental Health Policy Institute. The Money and Mental Health Policy Institute is a research charity, established by Martin Lewis to break the link between financial difficulty and mental health problems. Our response addresses the second set of questions in the consultation, around prevention of gambling addiction.

Background

- One in four adults are experiencing mental health problems at any time
- Problem gambling can be both a cause and consequence of mental health problems
- Problem gambling is associated with a wide range of psychological symptoms of mental health conditions, such as increased anxiety, low mood and poor coping skills
- Mental health problems can lead people to become problem gamblers, increase the harm caused by gambling, and make it harder to stop gambling
- A number of different mental health conditions and their treatments are associated with reduced impulse control, making it more difficult to limit gambling behaviour

Questions around prevention

What evidence is there on the impact of gambling advertising and sponsorship on problem gambling behaviour?

Evidence suggests that people who are vulnerable to problem gambling, including people with mental health problems, are more likely to be influenced by its advertisement.¹ Adverts with specific offers, like free bets when registering for an online account, can lead consumers to gamble more than they intend to.² This may be even more difficult to manage for people with mental health problems which increase impulsivity and make resisting urges harder. Avoiding these adverts and not acting on impulse requires willpower, which may be particularly difficult during a period of poor mental health. Their frequency and timing, such as late at night when people with mental health problems are vulnerable and more likely to respond, can create challenges to gambling responsibly.

“You get a message and it gets you thinking about logging on... I’ve had three texts from a betting company today.”

Additionally, many of the advertised deals are very complex, with strict rules about what funds can be withdrawn when and how many times they must be staked. Our research suggests

¹ Binde P. Gambling advertising: A critical research review. Responsible Gambling Trust. 2016.

² Hing, N et al. Do advertising and promotions for online gambling increase gambling consumption?. An exploratory study. International Gambling Studies 2014; 14, 3; 394-409.

consumers with mental health problems may find it harder to process information about these offers, and can sometimes be led to gamble excessively as a result.

Our evidence suggests that consumers are receiving a high volume of these promotions, and they have a significant impact on behaviour. The Gambling Commission should specifically monitor the distribution of promotional offers to vulnerable adults, as well as young people, and intervene if a wider problem is found. Firms should also be required to make it easy for consumers to opt out of receiving marketing materials across all communication channels, including text messages and in-app notifications. In addition to the proposed measures from the Gambling Commission and ASA/CAP, harm could be further reduced by banning adverts for gambling between 12am and 6am, including email marketing. This would particularly protect those experiencing sleep issues associated with mental health problems, or who are awake and under the influence of drink and drugs, both of which can make it harder to resist impulses.

Are there any changes to gambling legislation and regulation which would make an impact on the levels of problem gambling and gambling addiction?

Strengthening self-exclusion

The most extreme form of limiting access to the 24/7 online environment is voluntary self-exclusion, enabling people to remove themselves from gambling completely. However, the absence of a comprehensive self-exclusion system, allowing people to easily remove themselves from all online and in-person gambling operators, leads some people to simply swap channel to continue gambling. Self-excluding from a single gambling channel can require contacting numerous operators over the phone or in person, all of which can be challenging during a period of poor mental health.

These schemes could be improved by the introduction of:

- A single gateway to online self-exclusion provided to all consumers
- Multiple communication channels through which to complete the self-exclusion process
- More active promotion of self-exclusion, in particular to people who may have previously set spending or time limits, or who may be identified as at risk.

In the more immediate term, a limited form of self-exclusion could be achieved by enabling all consumers to block gambling transactions on debit or credit cards. Most gambling transactions (with the exception of lottery tickets) are identifiable by banks using Merchant Category Codes. It is possible for financial services firms to allow customers to block these transactions, providing a self-exclusion option that applies to both online and land-based gambling without the need to navigate the current maze of self-exclusion regimes. Our evidence suggests that a simple multi-channel self-exclusion tool is sorely needed, and that consumers who have self-excluded through one channel are currently switching and betting through other means. Bank card controls would offer a simple way to rigorously self-exclude in the short term using existing technology while we await the development of more robust self-exclusion schemes.

“I self excluded for a year from all websites...I went to the bookies and bet in person.”

Creating tools which help people to manage their gambling behaviours

Beyond stronger self-exclusion, we believe there are a suite of tools which could help people who want to gamble in a moderate way to protect themselves.

In addition to the nudges and time limits already under discussion, we would urge the consideration of mechanisms to allow players to block online gambling at night. Research shows that sleep deprivation reduces impulse control³, making gambling behaviour harder to limit. For people with mental health problems, this can be even worse. Difficulties sleeping are a common symptom of mental health problems⁴, leaving people awake at night and feeling isolated, when, for some, gambling online can be an unwanted temptation. 24/7 access to online gambling and the ease with which money can be added to online accounts means that all gamblers can spend more money and time gambling than they might wish to. Problems with managing impulses can also leave people staying up all night to win back losses. However, in many cases people are aware of the times at which they are most vulnerable and want to be able to limit their access to gambling in a way which works for them.

“PTSD flashbacks keep me up and angry at night. Then I go for a kick and the best place is the bookies to get that feeling of being on the edge.”

“Closing times on gambling sites would be amazing. Frustrating for me, through the night, but a good thing.”

Next steps

Further proposals for measures which could protect people experiencing mental health problems from the risks of problem gambling, together with our research findings in this area, can be found in our recent policy note [Know the odds](#). We would be happy to discuss this, and our recommendations above, in greater detail if this is of interest - please contact us to arrange a meeting.

Best wishes,

Katie Evans
Head of Research and Policy
Money and Mental Health

³ Drummond S, Paulus M, and Tapert S. Effects of two nights sleep deprivation and two nights recovery sleep on response inhibition, *Journal of Sleep Research* 2006; 15:3, 261-265.

⁴ Benca, RM et al. Sleep and psychiatric disorders: a meta-analysis. *Archives of General Psychiatry* 1992; 49, 8; 651-668