

## Money and Mental Health response to CAP and BCAP's consultation responding to the findings of the GambleAware Final Synthesis Report

### Introduction

The Money and Mental Health Policy Institute is a research charity established by Martin Lewis to break the vicious cycle of money and mental health problems. We aim to be a world-class centre of expertise developing practical policy solutions, working in partnership with those providing services, those who shape them, and those using them, to find out what really works. Everything we do is rooted in the lived experience of our Research Community, a group of 5,000 people with personal experience of mental health problems.

This written submission has been informed by this powerful, lived experience testimony, as well as our wider body of research. Unless otherwise specified, all quotes in this response are drawn directly from our Research Community. In particular, it makes reference to research conducted for a recent report, *A Safer Bet*, published in July 2020 that looked at people with mental health problems' experiences of online gambling. This involved a survey of 238 members of our Research Community who had gambled online, as well as a focus group. For more information please read our *A Safer Bet* report [here](#).

In this document, we respond to Questions 2a and 3b.

### Background

- In any given year, one in four people will experience a mental health problem,<sup>1</sup> and over a lifetime this rises to nearly half the population<sup>2</sup>. However, we do not always know when we are unwell, or receive treatment. Over a third (36%) of people with a common mental disorder have never received a diagnosis, and 62% are not currently receiving treatment.<sup>3</sup>
- The incomes of people with mental health problems are significantly lower than average, for people with common mental disorders like anxiety or depression this equates to an income gap of £8,400.<sup>4</sup> This can mean they have less savings to fall back on when their income drops.

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<sup>1</sup> McManus S et al. Adult psychiatric morbidity in England, 2007. Results of a household survey. NHS Information Centre for Health and Social Care. 2009.

<sup>2</sup> Mental Health Foundation. Fundamental facts about mental health. 2016.

<sup>3</sup> McManus S et al. Mental health and wellbeing in England: Adult Psychiatric Morbidity Survey 2014. NHS Digital. 2016.

<sup>4</sup> Bond N and D'Arcy C. Mind the income gap. Money and Mental Health Policy Institute. 2020.

- People with mental health problems can experience a range of difficulties accessing the benefits system, which can make it harder to claim entitlements.<sup>5</sup>
- Common symptoms of mental health problems, like low motivation, unreliable memory, limited concentration and reduced planning and problem-solving abilities can make managing money significantly harder.<sup>6</sup>
- People with mental health problems are three and a half times more likely to be in problem debt than those without, and half (46%) of adults in problem debt also have a mental health problem.<sup>7</sup>
- Mental health and financial problems can form a devastating, self-reinforcing cycle. Over 420,000 people in problem debt consider taking their own life in England each year, and more than 100,000 people in debt actually attempt suicide.<sup>8</sup>
- Mental health problems can impact the reasons why we gamble online, and make it harder to stay in control and cut down on the amount we gamble. A quarter (24%) of respondents to our Research Community survey had experienced financial problems as a result of gambling online, and one in three (32%) had bet more than they could afford to lose. Over a third (36%) had become stressed or anxious because of gambling online and the same proportion had felt guilty about the way they gamble.<sup>9</sup>

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<sup>5</sup> Bond N, Braverman R and Evans K. The benefits assault course. Money and Mental Health Policy Institute. 2019.

<sup>6</sup> Holkar M. Seeing through the fog. Money and Mental Health Policy Institute. 2017.

<sup>7</sup> Holkar M. Debt and mental health: a statistical update. Money and Mental Health Policy Institute. 2019.

<sup>8</sup> Bond N and Holkar M. A silent killer: Breaking the link between financial difficulty and suicide. Money and Mental Health Policy Institute. 2018.

<sup>9</sup> Holkar M and Lees C. A safer bet. Money and Mental Health Policy Institute. 2020.

**Question 2:**

- a. **Do respondents agree with CAP and BCAP's proposed additions to the Gambling advertising: responsibility and problem gambling guidance? If not, please state why.**

We welcome the proposed additions to the guidance, which we believe will give more clarity to operators and help prevent harm. The additions to section 4.3 on impulsiveness and urgency are particularly relevant for people with mental health problems, as increased impulsivity is a common symptom of several conditions.<sup>10</sup> In our research on online gambling, we found that many people with mental health problems felt that online gambling adverts were hard to resist when unwell.<sup>11</sup>

*"I find it really hard to resist the pop up adverts for gambling online. It's really tempting to click and have a go."*

Expert by experience

This is further exacerbated by the short journey from seeing an advert online to making a bet. It is therefore important that gambling adverts do not encourage impulsive behaviour or put undue pressure on the audience to gamble, and extra guidance on what this means in practice is welcome.

The additions to both sections 4.4 and 6.2, with particular regard to the portrayal of winners, are also welcome. Our research identified two common reasons why people with mental health problems might gamble that are particularly relevant to the additions. Firstly, for many, online gambling was seen as a means to solve financial problems. People with a mental health problem are more likely to be in problem debt, falling seriously behind on repayments in the last year,<sup>12</sup> and symptoms such as difficulty thinking clearly can make it harder for people to weigh up decisions and lead to an unrealistic view of what gambling can offer.<sup>13</sup> Secondly, online gambling was described by others as a way to escape poor mental health, providing a short-term means of lifting their mood.<sup>14</sup> Adverts that unrealistically depict gamblers as winning easily or take advantage of someone's own hopes of winning can, therefore, be especially problematic for people with mental health problems.

*"Gambling is like believing in a fairy tale. That something will come along one [day] to make everything better and take all your troubles away."*

Expert by experience

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<sup>10</sup> Holka M. Seeing through the fog. Money and Mental Health Policy Institute. 2017.

<sup>11</sup> Holkar M and Lees C. A safer bet. Money and Mental Health Policy Institute. 2020.

<sup>12</sup> Holkar M. Debt and mental health: A statistical update. Money and Mental Health Policy Institute. 2019

<sup>13</sup> Holkar M. Seeing through the fog. Money and Mental Health Policy Institute. 2017.

<sup>14</sup> Holkar M and Lees C. A safer bet. Money and Mental Health Policy Institute. 2020.

**Question 3:**

- b. Respondents are invited to submit further evidence, which suggests that exposure to gambling advertising can, in and of itself, result in gambling advertising-related harms? Respondents to this question are encouraged to have regard to the CAP and BCAP guidance on their approach to evidence-based policy making.**

Adverts for gambling are widespread and people can be exposed to them in a variety of different places. For many people, this can lead to gambling and for some it can directly lead to harm. In particular, adverts can make it harder for people who have decided to reduce their gambling to do so and it can lead to them returning to their earlier behaviour.

Our research found that many people with mental health problems feel overwhelmed by the amount of gambling adverts online. Three-quarters (73%) of Research Community respondents said they always or often see a gambling advert when online, and 85% felt it was impossible to avoid seeing online gambling adverts.<sup>15</sup>

*“The online adverts are horrendous, there feels like there is no escape at times.”*

Expert by experience

Previous research has suggested that seeing an advert can lead to gambling behaviour. For example, the Gambling Commission found that half (52%) of online gamblers with a social media account gambled after seeing an advert on social media.<sup>16</sup> Offers such as free bets that are designed to get people to sign up have also been found to sometimes encourage longer and riskier gambling behaviour.<sup>17</sup> The Ipsos MORI report on behalf of GambleAware also found such a connection.<sup>18</sup>

Within our own research, we heard from people with lived experience of mental health problems and online gambling who felt that adverts were difficult to resist and led them to gamble. In particular, there were several respondents who had tried to cut down on their gambling but had found it difficult to do so because they continued to be exposed to gambling adverts. People who have taken the decision to cut down on gambling are likely to have done so after experiencing some form of gambling-related harm and as such should be considered vulnerable to further harm. It can be very difficult to limit gambling: only 6% of Research

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<sup>15</sup> Holkar M and Lees C. A safer bet. Money and Mental Health Policy Institute. 2020.

<sup>16</sup> Gambling Commission. Gambling participation in 2019: behaviour, awareness and attitudes. 2020

<sup>17</sup> The Behavioural Insights Team. Can behavioural insights be used to reduce risky play in online environments? 2018

<sup>18</sup> Ipsos MORI. Final Synthesis Report: The impact of gambling marketing and advertising on children, young people and vulnerable adults. GambleAware. 2020.

Community respondents agree it was an easy process, while 71% disagreed.<sup>19</sup> Tools designed to block gambling adverts online are limited in number and effectiveness, and adverts on television appear during a range of programmes. Seeing adverts during the difficult period of trying to cut down can lead to people returning to gambling.<sup>20</sup>

*“Facebook adverts cannot be turned off for gambling, only reported as spam, so even after you've tried quitting you still get bombarded with them.”*

Expert by experience

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<sup>19</sup> Holkar M and Lees C. A safer bet. Money and Mental Health Policy Institute. 2020

<sup>20</sup> 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.