



MONEY AND
MENTAL HEALTH
POLICY INSTITUTE



SUPPORTING CUSTOMERS EXPERIENCING GAMBLING- RELATED HARM

A best practice guide for banks and building societies

Supporting customers experiencing gambling-related harm: A best practice guide for banks and building societies

Gambling can be an enjoyable activity for many people but for others it can cause significant financial and psychological harm.

Around 340,000 adults in Great Britain are classed as problem gamblers, meaning that gambling is damaging to them, their family or their life.

A further 1.75 million are at risk of harm.¹

Our research has found that struggling with gambling and experiencing mental health problems are often interlinked. In polling with people who have experienced both a mental health problem and gambled online, one in three (32%) agree that it is not easy to stay in control of online gambling. A quarter (24%) agreed that online gambling had been bad for their mental health.²

Given this worrying connection, Money and Mental Health has created this best practice guide to help banks and building societies support customers experiencing gambling-related harm.

"The addiction to load money then use it to bet is like a hit of cocaine. Wasted hundreds of pounds and missed payments. Very depressing."

Expert by experience

"In the past, gambling has made me suicidal and extremely anxious."

Expert by experience

The case for financial firms to act

Banks and building societies can play an important role in supporting customers who struggle to control their gambling. For many people who are experiencing gambling-related harm, the gambling companies and banks they have accounts with are the only ones who know about their behaviour and are in a position to help.

While Money and Mental Health is also pushing for improved regulation to make online gambling safer, banks are well-placed to act now to help their customers and mitigate some of the worst harms, in line with the Financial Conduct Authority's (FCA) guidance on the fair treatment of vulnerable customers.³

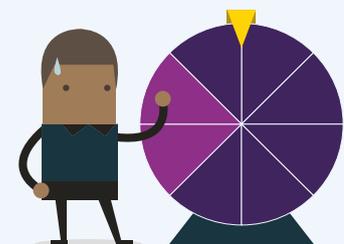
Around
340,000
adults in
Great Britain
are classed
as **problem
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32%
of people with mental
health problems who
gamble online say
**it's not easy to stay
in control of online gambling**²



24%
of people with mental health
problems who gamble online say
that **online gambling had been
bad for their mental health**²



Many people affected by these issues want banks to be more involved in supporting their customers. Almost half (47%) of people who gamble online believe that banks should do more to help people stay in control of their gambling.⁴ Currently, some banks offer customers tools to help them stay in control of gambling, such as spending blocks. Despite the availability of blocks, many people aren't aware of them: nationally, just one in three (33%) online gamblers report knowing about such tools.⁵

"I think the bank would be a better place to stop me as I just go somewhere else to gamble if stopped by the [online gambling] company and at the end of the day, it's their job to take your/our money."

Expert by experience

Banks also have access to a wealth of customer data from which they are able to spot signs of problem gambling. For example, a recent academic study that used anonymous transactional data from a bank found that gambling is associated with financial difficulties and negative lifestyle and health outcomes.⁶

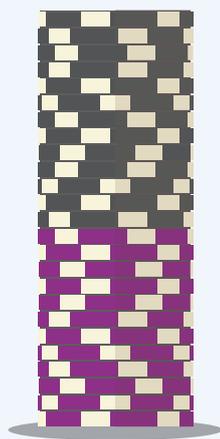
There are understandable concerns around the use of data, including protecting privacy and how customers would react to their bank's intervention. But there is public backing for banks using the information available to them to help customers. Our research found that half of UK adults (50%) think their bank or building society should use financial data to identify problems and offer support, with just 12% disagreeing.⁷

"Banks are far more proactive nowadays than they used to be, so I'd hope they would block transactions or step in in some way."

Expert by experience

47%

of people who gamble online believe that **banks should do more to help people stay in control of their gambling**⁴



Using this guide

Money and Mental Health has worked extensively with both those working in the financial services sector and people with lived experience of gambling-related harm to explore what could be done to support customers. This includes hosting a conference attended by representatives from across the sector and holding three workshops with banks to hear about what they are currently doing, and discuss what could be considered best practice.

This best practice guide is a result of that process and builds upon research conducted by Money and Mental Health and other organisations, such as the Personal Finance Research Centre (PFRC), the Behavioural Insights Team and GamCare. A list of useful resources and organisations working in this space is included at the end of the guide. While this guide refers primarily to banks, the suggestions will also relate to building societies and other financial service providers.

This guide applies to firms who are just starting this journey, as well as those who are further along and want to expand the support they offer.

Banks will have different structures and approaches, which will affect how easy or hard it will be to implement some of the steps included in this guide.

To help map out suggested progression, we include three levels of steps for banks to take:

- ▶ **the essential first steps all banks should start with**
- ▶ **the more advanced steps they could take**
- ▶ **the steps banks could take to lead the sector**

The guide is divided into three key areas:

- **culture and staff**
- **identifying customers struggling with their gambling**
- **supporting and empowering customers.**

Many of the steps in this guide can help banks follow the FCA's guidance on the fair treatment of vulnerable customers, and within each key area we outline which overarching actions in the FCA's guidance it matches up to.

To illustrate the personal impact of gambling-related financial harm, we also include quotes from people with lived experience about what they think would help them.⁸

Culture and staff

If banks are serious about helping their customers who experience gambling-related harm, they need to develop a culture within the organisation in which staff are aware of the issues affecting their customers, and how this relates to their role as employees.

This will help them to follow FCA guidance around skills and capability, customer service, product and service design, and monitoring and evaluation. To create this culture, banks should consider the following actions:

Including gambling in customer vulnerability plans and strategies

A culture of support cannot be created within an organisation unless it is driven from the top. Banks will have plans for how they can improve assistance to vulnerable customers across the organisation and many will be considering how this relates to FCA guidance. But sometimes gambling can be seen as a difficult issue to tackle, leading banks to be cautious in their approach.

- ▶ As a first step, banks should ensure that gambling is part of customer vulnerability plans and strategies, and that senior management are involved in the development of gambling-specific plans.
- ▶ Banks should have a designated person leading on assisting customers with gambling problems. This could be included within a wider vulnerable customer remit.
- ▶ Banks could then also create a group or committee dedicated to developing and delivering such plans.

Providing staff with training on gambling

Once plans have been created, banks should embed the issue of gambling in the organisation through training. Banks will have a range of staff who will come into contact with customers experiencing gambling-related harm or whose role has a direct influence on these customers. These staff will receive a variety of different training but given the scale of the issue, they need to be able to understand how gambling relates to their role.

- ▶ As a first step, banks should include gambling within training on vulnerable customers that is provided to all frontline staff. This could be done, for example, through the use of case studies of customers struggling with their gambling to help staff understand what the problem is, how it affects customers and what the bank can do.

- ▶ Banks should also provide a higher level of training on gambling to staff who focus on directly supporting vulnerable customers. This would ensure that customers struggling with their gambling can be escalated to specialist colleagues who are trained to deal with complex cases.
- ▶ As an advanced next step, firms could provide a higher level of training on gambling to all frontline staff. This would allow frontline staff to consistently and confidently support a customer experiencing gambling-related harm. This training could include how to identify a customer struggling with their gambling, how to deal with and record disclosures, what support to offer, where to signpost customers and how to escalate to colleagues who are gambling specialists.
- ▶ Banks could also create advanced training on gambling that could be offered to members of staff within different customer facing teams and among vulnerability specialists. These staff could then act as gambling champions within their teams to offer advice and assist other staff when they are interacting with a customer.
- ▶ Additionally, banks could consider expanding any training they provide on customers with mental health problems alongside training on gambling. Given the connections between money, gambling and mental health, many customers are likely to experience each of these issues.
- ▶ As banks further develop their training on gambling, they should not limit it to frontline staff or vulnerability specialists. More tailored versions could be offered to more senior staff members and, crucially, those designing new products and tools, helping them better understand what it is like for customers who struggle to control their gambling.

Training on gambling could be delivered by or developed with external organisations. A list of organisations is provided at the end of this guide.

Developing internal systems for supporting customers with gambling problems and providing resources to staff

As well as training, banks need to guarantee that there are consistent outcomes for customers struggling to manage their gambling.

- ▶ To achieve this, banks should ensure that there are systems in place to record disclosures and escalate to a specialist team. The systems that banks implement should allow staff to see relevant information about customers so that the customer does not have to unnecessarily repeat a disclosure. Banks could use models like TEXAS, which sets out steps for dealing with a customer disclosure, for such interactions.⁹
- ▶ As well as introducing such systems, it is important that staff are confident putting them into action. Beyond training, banks should offer basic resources to frontline staff for dealing with customers with gambling problems. This could be included as part of wider guidance on supporting customers in vulnerable circumstances. Guidance could include information on how to record disclosures, what assistance can be offered, where customers can be signposted to and how to escalate to specialist teams. These resources could be put on a staff intranet and would allow staff to put their training into practice. They could be referred to during customer interactions, or afterwards to help staff increase their knowledge.
- ▶ At a more advanced level, banks could equip specialist teams with in-depth resources and guidance that focuses specifically on gambling.

"[I'd like my bank to have] specialist, trained support teams that can guide and advise but not intimidate."

Expert by experience

Involving people with lived experience in design

Beyond training and guidance, hearing from those with lived experience can help staff understand what it is like to struggle to control gambling. This can ensure that banks get their approach right and that the support included in this guide works best for customers in these situations.

- ▶ Banks could involve people with lived experience of gambling-related harm in the design of new tools and communications. This could include testing and providing expert feedback. Banks could partner with support organisations to access experts by experience who have used such services. A list of charities and support organisations is included at the end of this guide.
- ▶ To lead the sector banks could create internal panels recruited from existing customers.

Monitoring and evaluating actions to support customers

Implementing the steps above will take time and supporting vulnerable customers is an ever-evolving task.

- ▶ Banks should monitor and evaluate the steps they take to assist customers with their gambling. This would allow banks to understand what works best and where there are gaps in policy and practice.

Being aware of new developments and sharing best practice

Both the financial services and gambling sectors are constantly innovating and evolving, and new developments could affect how banks support their customers.

- ▶ As advanced best practice, banks could monitor new trends in gambling behaviour among their customers, as well as developments more widely in the sector, to try to understand the scope for harm.
- ▶ Banks could also consider ways that they can work with others in the sector to share best practice and knowledge. Banks are at different stages of this journey but staff we have spoken with from across the sector made it clear that collaboration was key.

Identifying customers struggling with their gambling

There remains a significant stigma around problem gambling. Many people will be unsure or reluctant to disclose issues they face with gambling to their bank. It is therefore important that banks put policies in place that make it easier for customers to disclose that they are struggling to control their gambling. Banks can also utilise the transactional data they hold to support customers without having them disclose.

This section will help banks to follow FCA guidance on understanding customers' needs, skills and capability, customer service, and communications. To help customers disclose and utilise transactional data, banks should consider the following:

Making it easier for customers to disclose

It can be very difficult for someone to tell their bank that they are struggling to control their gambling and that they need help. It is essential that banks create an atmosphere that makes it easy for customers to disclose that they have problems with gambling.

- ▶ An important step banks should take is to proactively provide information on their website about how the bank can support their customers. Banks could also consider including testimonies or case studies on their website to make it clear to customers that they are there to assist them.
- ▶ Banks should offer customers a variety of communication channels to disclose, which will help those who struggle to use certain options. These channels should be prominently promoted on the website and in wider communications. On their websites, banks should also include information about what will happen when someone discloses, such as what will be discussed and how the data will be stored and used.
- ▶ Staff can make this disclosure easier by being supportive, empathetic and allowing the customer to take their time. Providing staff with training and resources can facilitate this.

Using customer transaction data

While there are controversies over the use of transactional data, our research suggests that customers think the benefits of avoiding harm outweigh the risks or inconvenience. Whatever steps banks take, they should involve their data protection team and work within data protection rules and guidelines.

- ▶ The FCA recommends that firms should understand vulnerability within their customer base. Banks should therefore design systems that allow them to use transactional data to understand the extent to which their customers are at risk of gambling-related harm.
- ▶ As a more advanced step, banks could use transactional data to spot signs that a customer is struggling to control their gambling and intervene to offer support. The volume and time of gambling transactions, transfers to e-wallets and the number of different gambling companies used could all be useful indicators of gambling problems.
- ▶ Interventions could include softer approaches, such as information about gambling support appearing within online banking account pages or targeted messages notifying customers of changes in their transactional behaviour. If potentially harmful behaviour is identified, banks could escalate to more specific and practical offers of support.

More information on how to design interventions can be found in our Data Protecting report.¹⁰

"If bank statements show lots of outgoings to gambling sites, perhaps it should be part of their duty to notify the account holder of the amount they are spending, and offer support. Even if it is as simple as some leaflets through the post. Just something."

Expert by experience

Communicating with customers

It is essential that banks communicate with customers about gambling in a way that is supportive and effective.

- ▶ Speaking about gambling can be very difficult and banks should carefully design communications, whether sending out targeted or general messages. Communications should be easy to understand and key pieces of information or actions should be prominent.
- ▶ To do this well, banks could test different communications with customers with lived experience of gambling-related harm. They could also use behavioural insights to understand how and when it is best to communicate with customers to get them to take action.¹¹
- ▶ To maximise the chances of customers engaging with these communications, banks should record and follow customer communication preferences when these are received.
- ▶ As a more advanced step, banks could offer customers the ability to choose the communications channel they prefer and stick to these preferences wherever possible. This will help customers get the right support more quickly.
- ▶ Banks should not overwhelm a customer by sending too much information after they have either disclosed or been identified as needing extra support. Banks can build up a relationship with the customer so that they can tailor communications to the customer's circumstances and allow them to take in any information about support or tools in a way and at a pace that works for them.

- ▶ If banks do use data to spot signs of harm, they should think carefully about how they communicate both the concept and individual interventions. Customers expect banks to use data to spot signs of fraud and take appropriate action, and banks can learn about what works best and when. Banks could use insights they already have from their fraud detection communications to design communication around data.
- ▶ In cases where interventions are automated, banks should ensure there is a pathway to receive support from a real person if the customer needs it.

"They could have pop up warnings, like they do for fraud."

Expert by experience

"Support and advise them in whatever way seems most effective. Maybe contact the customer if they see unusual/gambling payments coming out of their account and speak to them about how to help."

Expert by experience

Supporting and empowering customers

Once a customer has been identified as experiencing gambling-related harm, whether through disclosure or transactional data, banks can provide a range of support to empower them to manage their finances and get the help they need. Banks can also help customers get external support where appropriate, such as when a customer has experienced significant gambling-related harm or there are associated issues such as debt or mental health problems.

This will help banks follow FCA guidance on product and service design, and customer service. To best support their customers, banks should consider offering the following:

Signposting to external support

Sometimes customers experiencing gambling-related harm would benefit from help from an external source.

- ▶ In these cases, banks should signpost customers to the relevant support. As a first step, this should include links on the website to gambling charities or other organisations related to the customer's circumstances. Signposting should also be used in communications sent out to customers about gambling, both general and those targeted using data.
- ▶ Signposting should also occur in conversations, via the telephone, online chat and face to face, with customers where this is appropriate.
- ▶ At a more advanced level, banks could work with support charities to arrange warm transferrals.

A list of support charities and support organisations is included at the end of this guide.

"Banks could possibly help by reaching out to their customers, in a friendly and supportive way, if they notice a significant rise in online gambling deposits on an individual's account, offering proactive guidance and suggestions to sources of help before the problem gets out of hand."

Expert by experience

Implementing a gambling block

One of the key tools that banks can offer customers is a gambling transaction block that prevents spending on gambling. The gambling block can empower customers to manage their finances as it can be offered to customers who have been identified as needing support, but also used independently by customers.

- ▶ Banks should offer a gambling block and promote it, including through online banking and their app.
- ▶ Research suggests that adding in extra friction can make gambling blocks more effective by limiting the harm caused by someone acting on impulse.¹² One type of friction that banks could include is a cooling-off period that prevents the customer from making a gambling transaction for a certain amount of time after the block is switched off. Banks should start with a minimum block of 48 hours and then test to see if increasing it is more effective.
- ▶ Banks could also add other forms of friction into this process, for example requiring a customer to speak to a staff member in order to turn the blocks off or signposting to other organisations. Training for frontline staff on understanding problem gambling and supporting customers will also be essential in making this effective.

"[Financial service providers should] allow customers to set limits or blocks on payments to gambling companies."

Expert by experience

"Financial service providers should have a] feature on banking apps to block such website spending, but having to ring up to unblock it so that it isn't too easy to unblock."

Expert by experience

Introducing other spending controls

Alongside gambling blocks, banks often have a range of spending controls that could be offered to customers struggling to stay in control of their gambling.

- ▶ As a first step, banks should offer money management and budgeting tools that allow customers to understand how much they spend on gambling and what action they can take to ensure it is affordable.
- ▶ Banks could provide customers with spending limits for gambling sites to assist those who want to limit but not entirely stop their gambling.
- ▶ Banks could also give customers the ability to freeze cards and limit cash withdrawals. These tools can help people who withdraw cash in order to gamble in person at a bookmaker or casino to stay in control.
- ▶ To lead the sector, banks could explore the feasibility of introducing default limits for all customers on gambling transactions. These could be set using transactional data at levels that don't impact the majority of customers. Customers could still increase limits but would have to do so by speaking to a member of staff and they would be given information on responsible gambling.
- ▶ When designing tools to support customers with their spending, banks should ensure that they understand how it will be used by a customer struggling to manage their gambling. This could be done through the involvement of experts by experience and training for design teams.

"Place a limit on how much you can spend on online gambling. It could be a daily, weekly or monthly limit."

Expert by experience

Considering gambling in lending criteria

Some of those struggling to control their gambling can end up using credit to pay for their spending.

- ▶ Banks should design systems that allow customers with gambling problems to block themselves from taking out future credit if they desire.
- ▶ As a next step, when looking at a credit application, banks could take into account information about whether a customer has difficulties controlling gambling, and then direct customers to relevant support if necessary. These steps would allow banks to ensure their lending is responsible, affordable and does not lead to harm.
- ▶ As a way to lead the sector, banks could also consider sharing information about a customer wanting to block lending across the sector with the explicit consent of the customer. This could help to prevent gamblers having to update each lender individually and to minimise the risk of gamblers working around the block. This would complement plans proposed by PFRC for credit reference agencies to share notices of corrections with each other.¹³

"Ensure any loans requested are for the purpose given."

Expert by experience

"Cross check spending on gambling sites before any loans are issued to people."

Expert by experience

The steps included above are actions that banks, building societies and other financial services firms can take to best support their customers who might be struggling to control their gambling, or have experienced gambling-related harm.

Supporting these customers will always be an evolving task and some of the steps are at an

advanced level. But banks can play a crucial role and can make a real difference to people's lives.

We are always keen to hear from banks about actions they are taking to help their customers, and where our expert team can offer practical support and customer insight. If you want to find out more, please contact us at contact@moneyandmentalhealth.org.

Endnotes

- 1 Conolly A et al. Gambling behaviour in Great Britain in 2016. NatCen on behalf of the Gambling Commission. 2018. In recent years, different studies have produced varying estimates of the numbers of people experiencing gambling-related harm in the UK, including analysis suggesting there are between 340,000 to 1.2 million 'problem gamblers' in the UK. For more information on these studies see: S Dinos et al. Treatment Needs and Gap Analysis in Great Britain. NatCen on behalf of GambleAware. 2020.
- 2 Holkar M and Lees C. A safer bet. Money and Mental Health Policy Institute. 2020.
- 3 Financial Conduct Authority. Guidance for firms on the fair treatment of vulnerable customers. 2021.
- 4 Holkar M and Lees C. A safer bet. Money and Mental Health Policy Institute. 2020.
- 5 Holkar M and Lees C. A safer bet. Money and Mental Health Policy Institute. 2020.
- 6 Muggleton N et al. The association between gambling and financial, social and health outcomes in big financial data. Nature Human Behaviour 2021; 5; 319-326.
- 7 Alpin K and Holkar M. Data Protecting. Money and Mental Health Policy Institute. 2019.
- 8 Money and Mental Health has a research community of 5,000 people with lived experience of mental health problems. All quotes used are taken from research conducted with this group.
- 9 TEXAS is a model for interacting with vulnerable customers and it stands for T (Thank the customer for disclosing); E (Explain how the information will be used); X (eXplicit consent should be obtained to record the information); A (Ask the customer questions to get key information); S (Signpost to internal and external specialist help if required). For more information on TEXAS read – Fitch C, Evans J, and Trend C. Vulnerability: a guide for debt collection 21 steps, 21 questions. Personal Finance Research Centre. 2017.
- 10 Alpin K and Holkar M. Data Protecting. Money and Mental Health Policy Institute. 2019.
- 11 The Behavioural Insights Team states that behavioural change projects should be easy, attractive, social and timely. For more information on what timely can mean in practice read – Service O et al. EAST: Four simple ways to apply behavioural insights. The Behavioural Insights Team. 2015.
- 12 Evans J, Collard S, and Fitch C. A Blueprint for Bank Card Gambling Blockers. Personal Finance Research Centre. 2020.
- 13 Evans J, Collard S, and Fitch C. A Blueprint for Bank Card Gambling Blockers. Personal Finance Research Centre. 2020.

Relevant resources and organisations

Gambling

[The Personal Finance Research Centre](#) is an independent research centre based at the University of Bristol. Since 2019 it has been working in partnership with GambleAware on the [Money and Gambling: Practice, Insight, Evidence programme](#). As part of this it has produced a [report on gambling blocks](#) and a [guide for financial service providers](#) on how the FCA's guidance on the fair treatment of vulnerable customers relates to gambling. PFRC's guide is complementary to this best practice guide.

[GamCare](#) is a leading provider of information, advice and support for anyone affected by gambling harms. It produced a [set of toolkits](#) for organisations working with customers experiencing gambling-related financial harm, including banks. These toolkits are complementary to this best practice guide. GamCare also runs the [National Gambling Helpline](#).

The [Behavioural Insights Team](#) (BIT) is an organisation that aims to generate and apply behavioural insights to inform policy, improve public services and deliver results for citizens and society. It has produced [reports](#) on how behavioural science can help to design safer gambling tools. BIT has also published two reports on what bank transaction data can tell us about gambling behaviour – one analysing [HSBC UK customer data](#) and another analysing [Monzo customer data](#).

Researchers from Warwick and Oxford universities recently published [an article](#) based on their project that used anonymous transaction data from Lloyds Banking Group to examine the association between gambling as a proportion of monthly income and 31 financial, social and health outcomes.

The Gambling Commission has created a [Lived Experience Advisory Panel](#) to provide expert independent advice based on its members' personal lived experience of gambling harms.

[BeGambleAware](#) is a charity administered by GambleAware that provides information to help people make informed decisions about their gambling.

[Gordon Moody](#) is a charity dedicated to helping people reclaim and rebuild their lives free from gambling addiction through recovery in a safe, supported environment. They offer a range of treatment programmes including residential treatment, therapy and outreach support.

[GAMSTOP](#) is a free service that allows users to put controls in place to help restrict online gambling activities by preventing access to gambling websites and apps.

[Gamban](#) is a product that blocks access to online gambling across several devices.

[The NHS National Problem Gambling Clinic](#) provides treatment and support for adults experiencing gambling addiction in England and Wales.

[The NHS Northern Gambling Service](#) provides treatment and support for adults experiencing gambling addiction in the North of England.

[Gamblers Anonymous](#) runs face to face and online support groups for people struggling with their gambling and also offers a forum, a chat room and literature.

[Betknowmore](#) is a charity helping people take back control of their life from gambling by providing information and support services.

Mental Health

[Samaritans](#) is a charity that provides emotional support to anyone in emotional distress, struggling to cope, or at risk of suicide through their helpline.

[Mind](#) is a charity that provides advice and support to anyone experiencing a mental health problem, including through their infoline. They also offer training for staff who will come into close contact with customers experiencing mental health problems.

[Rethink Mental Illness](#) is a charity aiming to support people severely affected by mental illness through a network of local groups and services, and through advice and information. Along with three other charities it formed Mental Health UK who run [Mental Health and Money Advice](#), an online advice service designed to help people understand, manage and improve their financial and mental health.

Debt and financial difficulty

The [Money Advice Trust](#) is a national charity, helping people across the UK to tackle their debts and manage their money with confidence. It has produced a set of guidance for financial service firms including on [inclusive design](#) (with Fair by Design), and on [vulnerability, GDPR and disclosure](#) (with the Money Advice Liaison Group). It also runs the [National Debtline](#) for free, independent and confidential advice on personal debt over the phone and online via webchat.

[Citizens Advice](#) is a charity that provides free, confidential, impartial information and advice on a wide range of debt and benefits issues.

[StepChange](#) is a debt charity that provides free debt advice and debt management.

[Christians Against Poverty](#) is a debt charity that provides free debt help and local community groups across the UK.



The Money and Mental Health Policy Institute is an independent charity, set up by Martin Lewis in 2016, committed to breaking the link between financial difficulty and mental health problems. The Institute conducts research, develops practical policy solutions and works in partnership with both those providing services and those using them to find what really works.

This report is published as part of a two year programme funded by regulatory settlements approved by the Gambling Commission, aimed at increasing action among financial firms towards reducing gambling-related harm. The report represents the research and views solely of the Money and Mental Health Policy Institute.