

## Money and Mental Health's submission to the Culture, Media and Sport Committee's call for evidence on the Government's White Paper, *High Stakes: gambling reform for the digital age*

### 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 submission has also been informed by the experiences of our Research Community, as well as our wider body of research. Unless otherwise specified, all quotes in this response are drawn directly from the Research Community.

### Gambling and mental health - the facts:

Gambling can expose us to a range of harms. Our previous research found that struggling to stay in control of online gambling can have a devastating impact on our finances, our mental health and our relationships.<sup>1</sup> For example:

- In nationally representative polling of 5,000 people with experience of mental health problems, we found that nearly one in five (17%) always or often gamble more than they can afford when unwell.<sup>2</sup>
- Although not nationally representative, in a survey of our Research Community, a quarter (24%) of respondents have experienced financial problems as a result of gambling online, and one in three (32%) have bet more than they could afford to lose.<sup>3</sup>
- In nationally representative polling of over 2,000 people, a quarter (24%) of people with mental health problems who gamble online say that online gambling has been bad for their mental health.<sup>4</sup>

---

<sup>1</sup> Holkar M and Lees C. A Safer Bet. Money and Mental Health Policy Institute. 2020.

<sup>2</sup> Money and Mental Health analysis of online polling conducted by Opinium. 5,001 people with mental health problems, weighted to be nationally representative of those who have experienced a mental health problem, and 1,000 people without mental health problems were surveyed between 25 June and 22 July 2021.

<sup>3</sup> Holkar M and Lees C. A safer bet. Money and Mental Health Policy Institute. 2020.

<sup>4</sup> Lees C. Raising the stakes: Overcoming barriers to tackling gambling-related harm. Money and Mental Health Policy Institute. 2022.

- Although not nationally representative, in a survey of our Research Community, over a third (36%) have become stressed or anxious because of gambling online and the same proportion have felt guilty about the way they gamble.<sup>5</sup>

### **Question 1. What are the most welcome proposals in the Gambling White Paper?**

Organisations such as ourselves and individuals impacted by gambling harm have waited a long time for this White Paper, so we are pleased to see that the government has now proposed steps to reduce the financial and psychological harm gambling can cause and to support those who are at risk.

We are happy to see a renewed focus on making online gambling safer through the empowerment of customers. Previous research has highlighted that while there are digital tools available to help people manage or stop their gambling, there are often low levels of awareness of such tools.<sup>6</sup> People with mental health problems can also face additional barriers to accessing support to stop gambling, such as low energy and motivation.<sup>7</sup> As such, we welcome the government's recognition of these limitations. We eagerly await the Gambling Commission's upcoming exploration of potentially making these tools mandatory for players to use or to opt-out of, rather than opt-in, as well as other potential changes to reduce friction and help people gamble safely before problems arise.

We also welcome the Gambling Commission's future review and consultation on updating design rules for online products, building on its recent work on online slots, to consider features like speed of play which can exacerbate intensity and risk. Such features can be particularly harmful for people with mental health problems as they can exacerbate common symptoms such as increased impulsivity. Better designed products can foster a safer gambling environment that reduces potential financial and psychological harm. Furthermore, we support the government's proposal to introduce a maximum stake limit for online slots. This would help reduce harm where there is currently an elevated risk of rapid losses, while also leaving customers who play at low stakes unaffected, a factor we highlighted in our previous response.<sup>8</sup>

Beyond the proposals on online gambling, there were other welcome proposals in the White Paper. In particular, we welcome the plans for a statutory levy on gambling operators to fund better support services and independent research. Additionally, the proposal to create an ombudsman will be beneficial to those who have experienced gambling harm as a result of

---

<sup>5</sup> Holkar M and Lees C. A safer bet. Money and Mental Health Policy Institute. 2020.

<sup>6</sup> Gambling Commission. Gambling participation in 2019: behaviour, awareness and attitudes. 2020.

<sup>7</sup> Holkar M and Lees C. A safer bet. Money and Mental Health Policy Institute. 2020.

<sup>8</sup> Lees C. Money and Mental Health response to the Digital, Culture, Media and Sport Committee's Call for Evidence on Gambling regulation. Money and Mental Health Policy Institute. 2023.

negligent operator behaviour. Finally, the aim for the Gambling Commission to become a more proactive regulator is something that we have called for to better protect people from emerging harms.<sup>9</sup>

## Question 2. Are there any significant gaps in the Government's reforms?

- **Restricting Advertising:**

We are disappointed by the limited measures to restrict and limit gambling advertising. The prevalence of advertising is a key factor that compels many of us to gamble, and common symptoms of mental health problems can also make it harder to ignore gambling adverts when unwell. More than eight in ten (85%) of our Research Community members who responded to a Money and Mental Health survey felt it was impossible to avoid seeing online gambling adverts, and many felt overwhelmed by advertising.<sup>10</sup>

Additionally, there were several Research Community 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. There is particular risk of harm following exposure to online gambling adverts as the journey from advert to bet is often quick and easy.

*"The online adverts are horrendous, there feels like there is no escape at times."* Expert by experience

*"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

As such, it is clear that any potential gambling regulation needs to significantly tackle the role of advertising and marketing. In a past Money and Mental Health survey, nine in ten (88%) of our Research Community respondents favoured permanently banning online gambling advertising.<sup>11</sup>

While it is welcome to see that the Gambling Commission will be reviewing the design and targeting of incentives and will consult on greater control for customers over the types of marketing they receive, there are still gaps in regulation. The government should consider whether the Gambling Commission and Advertising Standards Authority have sufficient powers to deal with harm in this area and if not, address this. Although we support the government's

---

<sup>9</sup> Holkar M, Lees C, and D'Arcy C. Safety Net. Money and Mental Health Policy Institute. 2021.

<sup>10</sup> Holkar M and Lees C. A Safer Bet. Money and Mental Health Policy Institute. 2020.

<sup>11</sup> Money and Mental Health survey. Base for this question: 159 people with lived experience of mental health problems.

work through the Online Advertising Programme, the Gambling White Paper offers a unique opportunity to tackle the harm caused by gambling advertising.

- **Financial harm & affordability checks:**

We believe that the government should consider introducing stronger affordability checks. It is clear that one of the key harms that comes as a result of struggling to stay in control of online gambling is the impact it can have on our finances.

*"[Online gambling] has ruined me financially and in the past, I maxed out credit cards and payday loans to fund this habit."* Expert by experience

A Money and Mental Health survey found that one in four (24%) Research Community respondents have experienced financial problems as a result of gambling online, and one in three (32%) have bet more than could afford to lose.<sup>12</sup> People with a mental health problem are more likely to be financially insecure,<sup>13</sup> which means the financial impact from gambling related harms can be severe.

*"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

It is welcome to see the proposals for affordability checks and we look forward to the Gambling Commission's consultation. However, there is a risk that customers could fall through the gaps between the softer and more enhanced checks and experience significant financial harm relative to their financial circumstances. A key part of the proposals is to make the checks as frictionless as possible which can be beneficial at lower levels of spend but could expose customers to harm before the checks are completed. Our research found a preference among people with mental health problems who have gambled for stronger action where there is significant harm. For example, over half (57%) of Research Community respondents wanted their online gambling company to take immediate action such as freezing their account if they started spending significantly more money than usual.<sup>14</sup>

### **Question 3. What are the potential barriers to the Government and Gambling Commission delivering the White Paper's main measures by summer 2024, the Government's stated aim?**

---

<sup>12</sup> Money and Mental Health Survey. Base for this question: 133 people with lived experience of mental health problems who have gambled online.

<sup>13</sup> Bond N and D'Arcy C. Income in Crisis. Money and Mental Health Policy Institute. 2020

<sup>14</sup> Holkar M, Lees C, and D'Arcy C. Safety Net. Money and Mental Health Policy Institute. 2021.

A significant number of the proposals in the White Paper will be consulted on by the Gambling Commission. While it is important to have a rigorous process when introducing new regulation, this process can take a significant amount of time. Therefore, there is a risk that these proposals won't become mandatory for gambling companies until after summer 2024. Additionally, the White Paper itself was delayed following several changes of minister due to wider political changes. With a General Election due at some point next year, the resulting increased political activity could further impact the government's ability to deliver its aims in time.