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GAMBLING HARMS  
ACTION LAB

BY MONEY AND MENTAL HEALTH  
FOR FINANCIAL SERVICES

Policy Note Number 31  
November 2024

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# Shining a light

Exploring the role of financial services in  
tackling gambling harms

## Executive Summary

**Financial service providers have a privileged insight into a consumer's gambling spending and a unique opportunity to support people experiencing gambling harm.**

- Hundreds of thousands of people are experiencing harm from gambling. Harm not only impacts how much money we have to live but can destroy our relationships and livelihoods, rip our families apart, and devastate our mental and physical health. At its very worst, it can contribute to devastating loss of life from suicide.
- This is often hidden. People experiencing harm from gambling often do not disclose this to those around them due to the persisting stigma surrounding the issue.
- Current account providers are one of the few organisations that can see this harm occurring and have the information necessary to track it in real time.
- The FCA sets out standards for consumer protection under the Consumer Duty, and current account providers have a mandate to prevent foreseeable harm. As such, there is an opportunity to do more to tackle gambling-related harm.

**Too many people are still experiencing gambling harm.**

- The Gambling Commission's Gambling Survey for Great Britain (GSGB) 2023 found that overall 2.5% of people surveyed were experiencing problem gambling. A further 11.9% were at risk of experiencing problem gambling.
- Among those surveyed who had participated in gambling (excluding lottery draw only products) in the previous 12 months, nearly one-third (32%) were identified as at risk of or experiencing problem gambling.
- One in five people (21.7%) who had gambled in the past 12 months and who had experienced problem gambling reported losing their home, job, business, car or had been declared bankrupt because of their gambling.
- Among 18-34 year olds who gambled in the past year, 17.6% reported thoughts about taking their own life or attempts during that period. Of this group, one in ten (9.9%) reported that this was related to their gambling.
- These figures are concerning. In recent years, treatment bodies, regulators, and financial services providers have made a concerted effort to tackle gambling harms. However, our research has found that as online gambling transactions are largely visible to current account providers, there is a lot more that banks can do to prevent harm.

**People experiencing gambling harms are not accessing vital support when it is needed.**

- Almost six in ten (58%) people who had gambled in the last 12 months and were experiencing problem gambling had not accessed any support services at all, and just 15.3% of people experiencing problem gambling had accessed specialised gambling support services.
- 90% of people who were at moderate risk of problem gambling accessed no form of support at all, and only 3.7% accessed gambling support services specifically.

## **Key recommendations:**

To tackle this issue and mitigate the harms people are experiencing from gambling, financial services providers should:

- Utilise transaction data to identify customers at risk of or experiencing problem gambling.
- Proactively communicate with any customers identified as at risk of or experiencing problem gambling - offering signposting to external gambling support services.
- Advance and refine existing tools, such as gambling transaction blocks, to ensure they work effectively and can be tailored to suit a customer's specific requirements.
- Develop and implement opt-in current account spending limits that show people how much they are spending on gambling and what action they can take to ensure gambling remains affordable for their situation.
- Raise awareness of gambling harm across customer communications, increasing education and understanding of the support available to people.
- Test and iterate interventions, tools and messages with people with lived experience of gambling and gambling harms - to understand how interventions and support are likely to be received.

## **The government should:**

- Continue at pace with plans to introduce a statutory levy on gambling operators, delivering greater funding for gambling research, treatment, prevention and support.
- Consider the role of the financial services sector in tackling gambling harms and ensure this is an integral part of their plans for gambling reforms.
- Outside of these government recommendations focused on financial services, there is a huge amount for the government to do to tackle gambling harm. Our previous work includes a broader set of recommendations for the government to tackle gambling harms.<sup>1</sup>

## Introduction

The gambling landscape has rapidly changed over the last two decades. With 24/7 access via smartphones and targeted advertising, gambling is more widespread and accessible than ever before. Add to this the huge advancement in gambling products, including high speed, rapid and continuous play, and the relentless accessibility and promotion of high-intensity games.<sup>2</sup>

Given these advances, it's no wonder we've seen participation in gambling rise.<sup>3</sup> The latest annual Gambling Survey for Great Britain from the Gambling Commission (the national regulator of most forms of gambling in Great Britain) found that over one-third (37%) of respondents had participated in online gambling in the previous four weeks, such as online - national lottery draws, instant win games, betting on sports and racing, bingo and casino games.<sup>4</sup>

We're seeing concerning levels of at-risk and problem gambling across Great Britain. 2.5% of all those surveyed experienced problem gambling - representing too many people who are gambling to a degree that compromises, disrupts or damages their lives in some way. A further 11.9% are at 'at moderate or low risk of experiencing problem gambling'.<sup>5</sup>

### Definitions of gambling and the Problem Gambling Severity Index

Problem gambling can be described as 'gambling to a degree that compromises, disrupts or damages family, personal or recreational pursuits'.<sup>6</sup>

Risk and experience of problem gambling is often measured by the Problem Gambling Severity Index (PGSI), a nine-question survey which asks questions about behaviour and consequences of gambling, including your experience of gambling more than you can afford to lose, borrowing money to gamble, and financial or health problems arising from gambling.<sup>7</sup>

The PGSI uses a total score from the questions to categorise people into four groups: non-problem gamblers, low-risk gamblers, moderate-risk gamblers and someone experiencing problem gambling.<sup>8,9</sup>

Someone can experience harm at any level of the PGSI. Someone at low risk of problem gambling is unlikely to have experienced any severe adverse consequences from gambling, such as losing their home or job, or their relationship breaking down, but they may be at risk if they are heavily involved in gambling.<sup>10</sup> At moderate risk of problem gambling, someone may be experiencing adverse consequences from gambling.<sup>11</sup>

When we delve below these headline statistics, a worrying story of the scale and depth of harm emerges. **Nearly one-third (32%) of people surveyed *who'd participated in gambling in the last 12 months* (excluding lottery draw only products) scored somewhere on the PGSI scale, meaning they are experiencing or at low to moderate risk of experiencing problem gambling.**<sup>12</sup> This comprises more than one in twenty (5.9%) experiencing problem gambling, nearly one in ten (8.3%) with a moderate risk of problem gambling, and almost one in five (17.8%) with a low risk of problem gambling.<sup>13</sup>

While financial loss and debt are often a common focus when we think about gambling harms, the most severe impacts can go much further. Problem gambling can rip families apart, destroy relationships and livelihoods.<sup>14</sup> At its worst, gambling can contribute to the loss of life through suicide,<sup>15</sup> with an estimated 117-496 gambling-related suicides in England every year.<sup>16</sup> Harms are not solely limited to those who gamble either, as gambling harms can affect children, partners, wider families and social networks, employers and society.<sup>17</sup>

People gamble for many reasons, including to win money and as entertainment. But for some, a more complex and difficult reality can sit behind why people gamble. Many people gamble to escape difficult financial situations and even poverty.<sup>18</sup> And for people experiencing mental health problems, who are already more likely to be experiencing financial difficulties,<sup>19</sup> gambling can be more challenging to manage - impacting how much and how often we gamble.<sup>20</sup>

Lots of the rhetoric around gambling seeks to individualise the problem, suggesting that most people 'gamble responsibly' and that gambling harms is something that happens to a small minority of people.<sup>21</sup> This view ignores the social drivers and addictive nature of gambling, which can preoccupy people, drive secrecy and lead to people chasing their losses.<sup>22</sup> It also obscures the role that financial services can play in tackling gambling harms.

## **Banks have unique insights that have the potential to change the game in gambling support**

Over the past eight years, we've played a key role in identifying and driving actions for financial services firms to tackle gambling-related financial harm. We were instrumental in the innovation of banks introducing gambling blocks,<sup>23</sup> with Monzo and Starling leading the way in 2018 before other firms followed suit.<sup>24</sup> Despite this progress, there is still so much more to do.

The secrecy and shame that surround gambling can serve to enable harmful gambling can continue in the background, shielded from view and wreaking havoc in people's lives. But contrary to the commonly held view that only the person themselves and the gambling operators know about an individual's gambling, in the case of online gambling, there is a third party that knows almost every penny and pound spent on gambling - our current account provider.

Current account providers have a privileged view of our spending through our transaction data. As such, financial services firms know how much we gamble, how often and with which operators. Firms know when we're spending beyond our means - if we gamble before we pay our rent each month and if we're gambling with our overdraft facility. Through this unique lens into our financial world, current account providers have an opportunity to serve as a first line of defence in supporting customers struggling with gambling.

Over the past five years, the Financial Conduct Authority (FCA), which regulates financial service providers, has implemented guidance that banks must consider when supporting customers experiencing or at risk of problem gambling. First, in 2021, guidance was published for firms on the fair treatment of vulnerable customers, which encouraged financial service providers to understand customers' needs, including their experience of gambling.<sup>25</sup> In 2023, the Consumer Duty was introduced and has been a game changer in our efforts to tackle gambling harms, requiring firms to ensure good consumer outcomes and prevent foreseeable harm.

Further impetus for action comes from the Financial Ombudsman Service (FOS), which has seen increased customer complaints about gambling over the last ten years.<sup>26</sup> Over half (53%) of FOS complaints related to gambling were upheld, with FOS ruling that the businesses concerned fell short of their standards of conduct.<sup>27</sup>

The burden of responsibility has shifted from lying solely with an individual and the gambling operator. The FCA's Consumer Duty and Vulnerability Guidance means that current account providers must now play their part and support customers experiencing or at risk of gambling-related financial harm.

### **Launching the Gambling Harms Action Lab**

Building on our success, we've launched the Gambling Harms Actions Lab - funded from a regulatory settlement approved by the Gambling Commission.<sup>28</sup> Throughout this three-year programme we'll work with a select group of current account providers to explore how firms can best support customers at risk of or experiencing gambling harm. Together, we'll develop innovative ways to identify, proactively engage and offer supportive interventions to people struggling with gambling.



## This paper

This paper aims to explore people's experience of mental health problems and gambling harms and how financial service providers can meet their requirements and offer greater support. To do this, we:

1. **Analyse the Gambling Survey of Great Britain Annual Report 2023 data.**<sup>29 30</sup> - This survey represents a step change in looking at broader experiences of harm, with new questions about the adverse consequences of gambling.
2. **Analyse data from a new online survey of 221 members of the Money and Mental Health Research Community** - about their experiences of gambling and mental health problems.<sup>31</sup>
3. **Map the current tools financial services providers have available to help with gambling.**<sup>32</sup> - Mapping was compiled from available online content of 21 of the best banks and bank accounts as assessed by Which?<sup>33</sup>

Throughout this report, where possible, we focus our attention on online gambling. Examples of this include national lottery draws, instant win games, betting on sports and racing, bingo and casino games.<sup>34</sup> The reasons for this are twofold. Firstly, the rise in online gambling means that gambling online now outweighs in-person gambling by 37% to 29%.<sup>35</sup> Secondly, there is one party outside of the person concerned and the gambling operator that consistently bears witness to online gambling transactions - our current account provider. This is distinct from in-person gambling (which often utilises cash) - and provides a clear opportunity for financial services firms to intervene to prevent foreseeable harm and support their customers.

This paper first explores the current gambling harms policy and regulatory context in the UK. We then present an analysis of the Gambling Survey for Great Britain Annual Report 2023 to highlight the scale of gambling harm. Next, we share findings from our thematic analysis of the qualitative insights from our Research Community of people with lived experience of mental health problems and gambling harms. Finally, we discuss how financial services can begin to play their part in addressing gambling harms.

## The current context

To understand the current context of the gambling harms sector and the reason for urgent intervention by financial services firms, we must first understand the history and how we got here:

- For decades, gambling treatment and support have, controversially, primarily been funded by the gambling industry itself and delivered by a network of voluntary or third-sector organisations. However, with the NHS opening their first gambling treatment clinic in 2008,<sup>36</sup> and increasing this to 15 NHS gambling addiction clinics in 2024,<sup>37</sup> this has begun to change.
- The previous government's White Paper - High stakes: gambling reform for the digital age<sup>38</sup> - acknowledged that current regulation is not up to date and proposed introducing a series of measures to require betting firms to pay for treatment and incorporate new player protections. However, with a change in government, progress on implementing the White Paper reforms has stalled.
- The Gambling Commission Strategy 2024-2027 aims to deliver on their commitments in the White Paper by continuing to work in collaboration with all parties who have a role to play in reducing gambling harms, including the gambling industry, the NHS and regulators.<sup>39</sup>
- Growth and innovation in the gambling industry continues to progress - alongside other emerging challenges including black market traders and the increasing use of cryptocurrencies.<sup>40</sup> Currently, neither regulator, the Gambling Commission or the FCA, has a specific remit to address some of these new and growing forms of harm.<sup>41</sup>
- Open banking allows financial service and other third-party providers to access customers' financial data, with their consent, across multiple accounts and providers.<sup>42</sup> This level of transparency affords banks and gambling operators the opportunity to obtain a clearer view of a customers financial circumstances, observe if people are gambling within their means - and where required, offer interventions to reduce the risk of harm. Yet, there are also implicit risks and challenges involved which require strong regulatory oversight to mitigate the risk of this financial data being used to exploit vulnerable customers.
- In addition to this live political context, despite new data from the Gambling Commission's Gambling Survey for Great Britain, we still have a disputed picture of the prevalence of problem gambling across the country.

In the midst of this picture of disputed data and slow progress, it is undeniable that **too many people are experiencing gambling harm**. Gambling harm persists, and therefore, so too must our efforts to drive this number down.



## Gambling is not a matter of personal responsibility or moral failing

Gambling problems and gambling disorder continue to be incredibly stigmatised, and there is still a view in society that gambling is a matter of personal responsibility.<sup>43</sup> But gambling and gambling problems are not a 'moral failing'. We can all struggle to control our behaviour under different circumstances and at different times in our lives, even without the sophisticated design of gambling products and the destructive interplay with mental health problems.

- **Gambling products and games have transformed beyond recognition** - from the days of gambling at the racecourse or a trip to your high street bookmakers to bet on the horses. The internet and technological advances mean designers of gambling products have been able to ensure products are faster, gameplay more continuous, and rewards more instantaneous than ever before.<sup>44</sup> These features can interfere with our ability to process and adjust our gambling behaviour and mean we play over and over.<sup>45</sup> This, coupled with the 24/7 accessibility of gambling products through our smartphones in our pockets, can lead to the escalation of gambling as escapism to harm and even addiction.<sup>46</sup>
- **There exists a toxic cycle between poor mental health and gambling** - When mental health declines, decision-making is impaired, leading to risky gambling behaviours and difficulty sticking to financial limits. Gambling during these times can worsen mental health, creating a cycle where each issue fuels the other. Those with mental health problems are more prone to gambling disorders, and those with gambling disorders often struggle with anxiety, mood disorders, and Attention Deficit Hyperactivity Disorder.<sup>47</sup> This relationship is two-way, as mental health issues can worsen gambling problems, and gambling can intensify mental health conditions, often going unnoticed.<sup>48</sup>

*"Poor mental health hinders the sensible voice in my head, so limitations are pushed."*

Expert by experience

*"I gambled more and with greater amounts of money when depressed."*

Expert by experience

*"I was in a psychosis and in a psychiatric ward on one occasion when I gambled. I set up an online account and lost all my money. Doctors provided evidence that I did not have the mental capacity to make rational decisions. Gambling companies were not interested..."*

Expert by experience

## The scale of gambling across Great Britain

The Gambling Survey for Great Britain 2023 provides insights into the extent of gambling harm. Below, we highlight the scale and experience of gambling across four specific groups where the harm is particularly acute and also where financial services can target support.

### People with experience of problem gambling

Of all people surveyed, just over one in forty (2.5%) were categorised as experiencing problem gambling with a PGSI score of 8-27.<sup>49</sup> Yet, when we zoom in to explore the prevalence among people who'd participated in gambling in the last 12 months (excluding lottery draw only products), this rose to more than one in twenty (5.9%) who'd experienced problem gambling.<sup>50</sup> This means that people are gambling to an extent where they are experiencing consequences and are at a much higher likelihood of gambling harm, including the breakdown of relationships and deterioration of physical and mental health.<sup>51</sup>

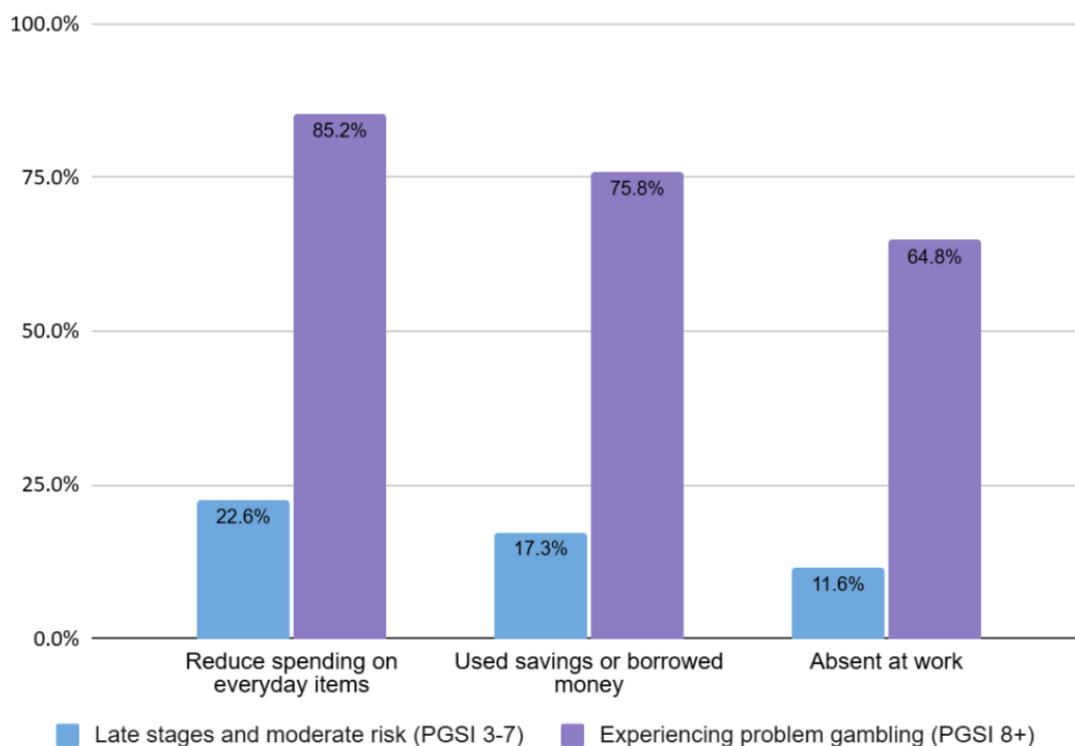
People who experience problem gambling are among those who experience the most difficult financial circumstances. Among those who'd gambled in the past 12 months and who had experienced problem gambling, over three-quarters (75.8%) had used savings or borrowed money to gamble.<sup>52</sup> More than eight in ten (85.2%) had reduced spending on everyday items.<sup>53</sup> Gambling had led almost two-thirds (64.8%) of people who had experienced problem gambling to reduce, be absent from or perform poorly at work.<sup>54</sup> These consequences of a person's own gambling can, in turn, harm people's relationships and livelihoods.

*"I spent essential funds that were for bills, food and other expenses. As a result, I fell into financial difficulties and needed the help of a debt management agency to budget my finances and pay my debts. I also needed emotional and psychological support from mental health talking therapies because I became deeply depressed."*

Expert by experience

One in five people (21.7%) who had gambled in the past 12 months and who had experienced problem gambling reported losing their home, job, business, car or have been declared bankrupt because of their own gambling. This is a considerable percentage of people suffering extreme financial harm.<sup>55</sup>

**Figure 1: Proportion who gambled in the past 12 months experiencing potential adverse consequences due to their gambling, by Problem Gambling Severity Index (PGSI) score categories**



Source: Gambling Survey for Great Britain, Annual Report 2023. The annual survey of attitudes and experiences of gambling in Great Britain by the Gambling Commission. Table D.12. Percentage who reported experiencing potential adverse consequences either very often, fairly often or occasionally.

## The experience of people at risk of problem gambling

Treatment and support efforts have understandably primarily focused on those who are currently experiencing gambling to problematic levels. While supporting those in the most acute need is vital, financial distress and poor health can also be prevalent among low level gamblers.<sup>56</sup>

Below we dig into the experiences of a more typically overlooked group - those people showing indicators of low or moderate risk of experiencing problem gambling. Despite being categorised as at 'lower' risk, this group may still be experiencing adverse consequences from gambling, including relationship breakdown and financial harm.<sup>57</sup> Primarily paying attention to those already in the most acute need misses the opportunity to prevent some of the worst harms from happening.

Of all people surveyed, almost one in eight (11.9%) were categorised as at low or moderate risk of problem gambling with a PGSI score of 1-7.<sup>58</sup> Yet, again, when we zoom in to explore the prevalence among people who'd participated in gambling in the last 12 months (excluding lottery draw only products), this rose to over a quarter (26.2%) identified as a risk of problem gambling,<sup>59</sup> comprising nearly one in ten (8.3%) with a moderate risk of problem gambling and almost one in five (17.8%) with a low risk of problem gambling.<sup>60</sup>

Common perceptions of 'low risk' mean it could be easy to assume that those who fall into low or moderate risk of problem gambling categories are not experiencing gambling harm. However, this is not always the case, and some people who fall into this often overlooked at-risk category do experience potential adverse consequences. More than two in ten (22.6%) people who were at moderate risk of problem gambling and who had gambled in the past 12 months had reduced spending on everyday items such as food, bills or clothing.<sup>61</sup> And more than one in six (17.3%) had used savings or borrowed money.<sup>62</sup> 3.9% had experienced the severe consequence of losing something of financial value, such as a home or car, or experienced bankruptcy due to their own gambling.<sup>63</sup>

## **The experience of young people aged 18-34**

Rates of problem gambling were higher in young people than in other age groups, with almost one in twenty (4.8%) 18-24 year-olds experiencing problem gambling and 5.2% of 25-34 year-olds.<sup>64</sup> These rates are around double the proportion of people overall who were experiencing problem gambling (2.5%).<sup>65</sup>

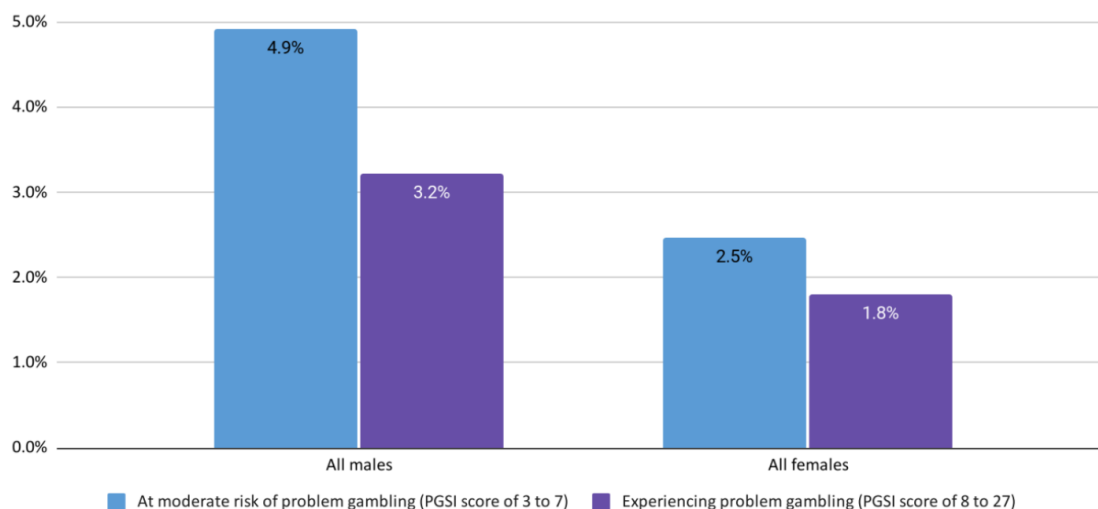
Again, almost double the proportion, over one in ten (12%) of 18-34 year-olds who had gambled in the past 12 months had reduced spending on everyday items such as food or bills, compared to 6.7% of people surveyed overall.<sup>66</sup> Just over one in ten (10.5%) people aged 18-34 had used savings or borrowed money due to their gambling;<sup>67</sup> again more than double the result for the overall population (5.2%).<sup>68</sup>

The proportion of individuals who have considered or attempted suicide due to their own gambling is concerning. Among 18-34 year olds who gambled in the past year, 17.6% reported thoughts about taking their own life or attempts. Of this group, one in ten (9.9%) reported that this related a little or a lot to their gambling.<sup>69</sup> While the reasons for suicide can be many and varied, these risk factors must not be overlooked. They serve as a call to action to financial services firms in the timely identification of people at risk of gambling harm and the offer of support.

## **Men are more likely to experience or be at risk of problem gambling**

In considering the groups at higher risk of problem gambling, it's important to recognise the disproportionate number of men who are affected. As Figure 2 shows below, men are almost twice as likely to be at risk of problem gambling (4.9%) compared to women (2.5%).<sup>70</sup>

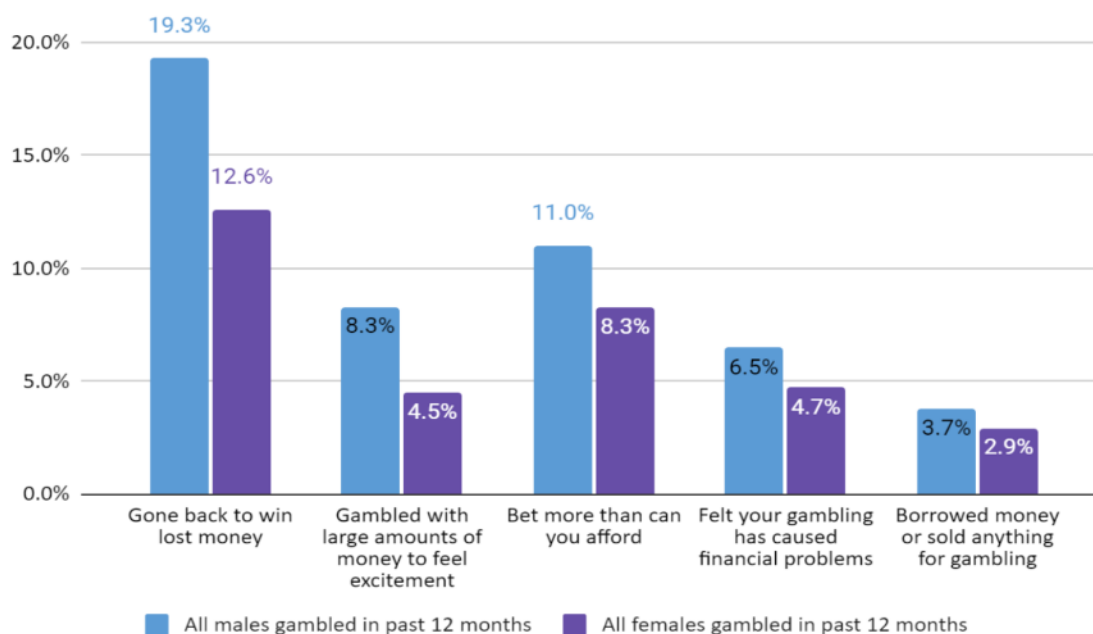
**Figure 2: Comparison of men and women who are experiencing and are at moderate risk of experiencing problem gambling from Gambling Survey for Great Britain Annual Report 2023.**



Source: Gambling Survey for Great Britain, Annual Report 2023. The annual survey of attitudes and experiences of gambling in Great Britain by the Gambling Commission. Table D.3.

As Figure 3 below shows, men who have gambled in the past 12 months are at greater risk of experiencing problem gambling than women who have gambled in the same period. Nearly two in ten men (19.3%) have returned to win money lost compared to just over one in ten women (12.6%). Men who have gambled in the past 12 months are nearly twice as likely as women to report having gambled with large amounts of money to feel excitement (8.3% vs. 4.5%), and are at greater risk of problem gambling across all PGSI indicators.<sup>71 72</sup>

**Figure 3: Male and female comparison of statements that indicate problem gambling in the PGSI. Gambling Survey for Great Britain Annual Report 2023.**



Source: Gambling Survey for Great Britain, Annual Report 2023. The annual survey of attitudes and experiences of gambling in Great Britain by the Gambling Commission. Table D.1. Percentages include grouped responses of sometimes, most of the time and almost always to five PGSI indicators.

## The devastating impact of gambling-related financial harm on lives

The financial harm caused by gambling is just one of a long line of potentially devastating consequences for individuals caught up in the throes of at risk and problem gambling. But while psychological harm or damage to relationships can be hard to spot, financial harm is hiding in plain sight, and current account providers can be quite literally witnessing it unfold.

Below we explore insights from thematic analysis of our Research Community survey on gambling and mental health, to highlight some of the harms people experienced.

### Gambling as a route to escape financial hardship

For many, gambling is a way to escape or alleviate desperate financial circumstances.<sup>73</sup> Over half of Research Community members (51%) said they turn to gambling to increase their income.<sup>74</sup>

*"[It's] very hard to manage with little money on benefits, so gambling [is a] way [of] coping."*

Expert by experience

When people are experiencing desperate financial circumstances, gambling can seem like a 'quick fix' and sometimes a last resort from financial harm, offering the false hope of alleviating mental health problems, gambling in the hope of improving or changing their current circumstances.

*"I suppose the aim of gambling is to increase my income/money so that I don't have to worry about money any more or life things - money gives you the chance to change your life, and if you can't make that money any other way, at least gambling gives you a slight chance of winning money and changing your life."*

Expert by experience

Despite the intention to gamble to escape desperate financial circumstances, people who hope for an improvement in their lives and financial circumstances often end up in a worse financial position. The financial reality for many people is that they are gambling to make up an income deficit and meet their essential needs.

*"Struggling with the current financial crisis and cost of living, I tried to increase funds by gambling. Unfortunately, it placed me in more financial hardship, impacted my wellbeing and left me in a worse situation."*

Expert by experience



## People are going into debt and going without essentials because of gambling

Against a backdrop of sophisticated and addictive gambling products, many people are incurring debts to facilitate their gambling.

*"It is unbelievable how many times I would top up my betting account. I was also able to take a loan out online and increase my overdraft. I was unable to meet the minimum payments each month."*

Expert by experience

To compensate for these debts and deficits, people often need to reprioritise where funds are going. This can lead to reduced money and using funds from household budgets. People can go without essentials such as food, clothes, and personal care items.

*"I often gambled more than I had available and often went without food so I could still gamble."*

Expert by experience

While high gambling spending is commonly associated with harm, this can be a red herring. To focus on the amount spent can obscure an important part of the picture. As we see from the experiences of Research Community members, harm can be experienced at low spending levels or not being able to afford essentials to live.

## Despite the harm experienced, people are not accessing vital support

Gambling support services are the first services that come to mind when we think about supporting people at risk of gambling harm. But as gambling harms take many forms, including mental health problems, relationship breakdown and financial difficulties, to name just a few, there are a diverse range of services available to support people. The Gambling Survey for Great Britain showed that uptake for gambling support across those surveyed was dangerously low.

Alarmingly, over half (58%) of people who had gambled in the last 12 months and were experiencing problem gambling had not accessed any support services at all.<sup>75</sup> Food banks or welfare organisations were the most common route of support for 28.2% of people who had experienced problem gambling, with gambling support being the least likely support service they access, with just 15.3% of people experiencing problem gambling doing so.<sup>76</sup>

While this picture is bleak, the case for people at risk of problem gambling may be even more stark. Among people who had gambled in the last 12 months and who were at moderate risk of gambling harm, a huge 90% of those had not accessed any support services.<sup>77</sup> And just 3.7% of people at moderate risk had accessed specific gambling support services.<sup>78</sup>

Driving up the number of people accessing support services is crucial. However, encouraging people to do so earlier on in their gambling journey is also essential if we are to minimise the harm that people experience.

## Where are firms now?

Current account providers recognise that they are essential in tackling gambling harms. Over the last few years, firms have made significant strides forward. We've seen the widespread roll out of banking gambling blocks across the sector, and some financial services firms have begun to lead the charge, working hard to embed gambling harm strategies in their organisation. Other organisations have begun innovating to create initiatives and tools to help customers who want support to manage their gambling and protect themselves from harm.

To understand what firms are doing to help tackle gambling harms, we mapped the available online content from the 21 'best' banks and bank accounts as assessed by Which?<sup>79 80</sup> Our analysis only covers the types of support firms are offering on their public facing websites and does not include other internal initiatives that we know several firms are taking to progress their approach to gambling harms.

### Opt-in banking tools to limit or block gambling transactions

Bank gambling Blocks (BGBs), which block your bank account or debit card from being used for gambling transactions, are one tool to enable customers to take control of gambling. 17 out of the 21 firms (81%) mapped offered customers some form of gambling transaction block. Four current account providers did not offer any form of gambling block.<sup>81</sup>

When customers turn off a BGB, they must wait before they can gamble from their account again. This is called a 'cooling-off period'. Cooling-off periods are central to how helpful BGBs are. They enable people to think and pause before they are allowed to gamble again. Of the 17 banks that offered a BGB, each offered different lengths of cooling-off periods: 11 (61%) had a 48-hour cooling-off period, five (28%) had a 72-hour cooling-off period, and one offered a customised 48-hour—365-day cooling-off period.<sup>82</sup>

*"The gambling block is useful when I get an on the spot urge to go into a bookies as it takes 48 hours to come off."*

Expert by experience

BGBs are among a suite of tools current account customers can use to limit their gambling. Other tools available by current account providers include spending limits, where customers can limit how much they can spend in a single card transaction, and banking insights, where customers are shown how much they are spending in particular areas, such as gambling. Such tools can help people control their spending. However, our research with the Research Community found that awareness of useful tools such as these was low. While nearly seven in ten (69%) Research Community members surveyed reported that they have gambled during a period of poor mental health,<sup>83</sup> 58% of all respondents were not aware of bank gambling blocks.<sup>84</sup> This shows a missed opportunity by financial services firms to support customers and prevent foreseeable harm.

## Communication, information and signposting

Positively, all but one of the 21 banks link to the National Gambling Helpline on their website. However, beyond this we found that the amount and quality of gambling support information provided to customers was inconsistent between firms.<sup>85</sup>

An example of this is that eight of the 21 firms we reviewed signposted to the TalkBanStop programme,<sup>86</sup> which brings together three sources of gambling support through Gamcare, gambling self-exclusion through Gamstop, and free access to online gambling blocking software through Gamban.<sup>87</sup> While many of the remaining 13 firms did signpost to Gamstop, Gamban and the National Gambling Helpline individually, these firms did not make explicit mention of the streamlined customer journey through TalkBanStop. Given the links between gambling and mental health problems, joining together signposting support services may reduce the cognitive load of navigating three different support services.

Three-quarters (75%) of Research Community survey respondents said they had never received communications from their bank or had been signposted to gambling support services.<sup>88</sup> Among respondents who had reported they had gambled at least once a week within the past four years, this figure was even higher with just under nine in ten (88%) saying they had not received communications from their bank or been signposted to gambling support services.<sup>89</sup>

*"I didn't have any help from the bank at all; I now bank with a different company."*

Expert by experience

## What support do people want?

Banks have access to a wealth of transaction data that can be useful in understanding when customers are at risk of gambling harms. Research Community members highlighted they wanted to be notified by their bank when they identified unusual spending in transaction data that could indicate harm. This ranged from being notified when banks identified high gambling spend to banks checking in with customers when they gambled late at night.

*"Monitor spending habits on gambling and contact me directly when it begins to affect paying for bills or unable to come out of my overdraft, incurring more fees."*

Expert by experience

*"Highlight unusual spending - I didn't realise how much I spent until it was highlighted to me. Now I've got set limits."*

Expert by experience

Communication from banks is important in making people aware of their gambling spending, and reminding and enabling customers to use tools to ensure their spending is within affordable limits.

## The levers of change: the case for financial service providers to action

The state of the challenge set out in this report highlights the need for innovative approaches to engaging and supporting customers. This must come from the collective effort of organisations, including gambling operators, government officials, regulators, banks, and other financial service providers.

### **Consumer focused regulation requires banks to be instrumental in preventing gambling harms**

The New Consumer Duty 2023 and Vulnerable Customer Guidance 2021 are essential for banks when considering their responsibility to customers who experience gambling harm. Banks must act to deliver good customer outcomes, not just by being aware of their customers' vulnerabilities but also by being proactive in providing support.

- **Guidance for firms on the fair treatment of vulnerable customers, 2021** - The FCA 'Guidance for the Fair Treatment of Vulnerable Customers' sets out what regulated firms must understand and implement to support their customers.<sup>90</sup> The FCA guidance outlines how firms should be able to (a) identify customers in vulnerable circumstances, (b) understand their needs, and (c) act to meet those needs where necessary.<sup>91</sup>
- **A New Consumer Duty 2023** - The Duty sets financial guidance for consumer protection standards. This included the cross-cutting 'consumer principle' to ensure good consumer outcomes by requiring firms to (a) act in good faith and (b) enable and support customers to pursue their financial objectives.<sup>92</sup>

**Table 1: Consumer Duty and the application to gambling harms for financial service providers**

FCA expectations FG22/5 <sup>93</sup>	How can firms implement for customers at risk of gambling harm?
<p>5.38: Firms must proactively and reactively focus on improving customers' ability to make decisions based on their needs and financial objectives. This would include recognising and taking account of consumers' behavioural biases and the impact that characteristics of vulnerability can have on their needs.</p>	<ol style="list-style-type: none"> <li>1. Banks must recognise and take into account behavioural biases, such as gambling disorder, problem gambling and mental health problems,<sup>94</sup> and the risk this may pose to customers' financial wellbeing, e.g., the risk of customers not being able to make payments and problem debt.</li> <li>2. Banks must act on these signs of or risk of gambling harm in their customer base through bank transaction data to ensure good outcomes for customers.</li> <li>3. Banks must learn from situations that arise for customers and work to make these better.<sup>95</sup></li> </ol>
<p>5.34: In supporting customers' understanding firms should act to avoid foreseeable harm.</p> <p>5.35: Firms should adopt a flexible consumer support approach that considers customers' needs with characteristics of vulnerability.</p> <p>Firms should also use appropriate friction in customer journeys to give customers sufficient opportunity to understand and assess their options.</p>	<ol style="list-style-type: none"> <li>1. Develop and adapt tools to account for vulnerabilities, such as mental health problems and people experiencing and at risk of problem gambling.</li> <li>2. Adapt and innovate existing tools such as Bank Gambling Blocks (BGBs) and spending tools for specific vulnerabilities.<sup>96</sup></li> <li>3. Banks should close loopholes of friction-based tools such as Bank Gambling Blocks (BGBs) to ensure the best outcomes.<sup>97</sup></li> </ol>
<p>5.35: Firms should test communications where appropriate to support consumer understanding so that they can make effective decisions and act in their interests.</p>	<ol style="list-style-type: none"> <li>1. Develop communications with lived experience of both gambling harms and mental health problems to prevent foreseeable harm through stigmatising communications.</li> <li>2. Test communications with people with lived experience of gambling harms, ensuring the inclusion of those not normally represented, such as those affected by someone else's gambling, women, young people and people from minoritised ethnic backgrounds, to name a few.</li> </ol>

*Source: Money and Mental Health analysis of the Financial Conduct Authority 'A New Consumer Duty' 2022, applied to gambling harms.*

## Recommendations

Solutions to gambling harms are many and varied, which require focused efforts by government and collaboration across sectors and industries. Financial services firms are one such sector that have a crucial role to play in tackling the serious gambling harms that their customers are experiencing today.

Below, we propose nine recommendations for financial service providers to begin to address gambling harms among their customers.

### Nine recommendations for financial service providers

Throughout this paper, we've set out the scale of harm experienced by people both experiencing problem gambling and also those at risk of experiencing problem gambling. Financial services should aim to adopt an approach that protects all customers from harm, investigating behavioural and spending patterns that may indicate the risk of harm and proactively reach out.<sup>98</sup> Financial service providers should:

1. **Utilise transaction data to identify customers experiencing or at risk of gambling harm** - Develop indicators of spending patterns and behavioural signs of harm and engage earlier to prevent people from severe financial harm.<sup>99</sup> Indicators of harm may include high frequency gambling, changes in when someone gambles or the amount they gamble, signing up to multiple operator sites in a short period, taking out new credit, gambling in an overdraft facility, and gambling as soon as wages or payment reach an account.
2. **Proactively communicate with customers identified as at risk of or experiencing gambling harms** - offering signposting or referring to external, specialist gambling support organisations - and driving up the numbers of people who seek gambling support at an earlier stage.
3. **Advance and refine existing tools** - to ensure customers can better protect themselves from gambling-related financial harm. Banks should develop existing gambling tools, enabling customers to choose their cooling-off period for gambling blocks.
4. **Develop and innovate opt-in current account spending limits** - 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 their spending remains within affordable limits.
5. **Develop targeted messaging to high-risk groups** - Young men are identified as being at greatest risk of gambling and gambling harms. Identifying and targeting messaging for high-risk demographic groups is essential in recognising that this harm disproportionately impacts some sections of society.
6. **Develop spending limit tools on current accounts** - to enable customers to ring fence monthly funds for essentials such as rent, utilities, and food, before they can use money in their account for gambling. This would help customers support themselves.
7. **Integrate gambling harm awareness in customer journeys and encourage customers to take up gambling management tools** - financial services providers should increase awareness about existing bank gambling tools to ensure people who need them know about and can access them.



8. **Test interventions, tools and messages with people with lived experience of gambling and gambling harms** - to test how interventions and support are likely to be received and refine messages to ensure they're effective in supporting customers.
9. **Use open banking to help prevent gambling harm** - With customers' consent, financial services providers can leverage their financial data across multiple providers to gain deeper insights, offer targeted support and in some instances use this information to make more informed lending decisions. This could include tracking frequent payments to gambling operators, identifying signs of financial difficulties, and proactively providing personalised notifications and alerts to help those at risk.

## **Recommendations for government and regulators**

This policy note would not be complete without acknowledging the role of the government, the regulator, and the commissioners in tackling gambling harm across Great Britain. Of course, banks are not the cause of gambling harm and to put all of the answers and solutions at the feet of financial services providers would not be right or fair.

That's why, as well as working with financial services firms to innovate and improve support to customers at risk of gambling harms, we'll continue to call on the government to progress with introducing the statutory levy on gambling operators, ensuring that the provision of funding for gambling research, prevention, treatment, and support is not at the mercy of voluntary contributions from the industry. We'll also continue to support campaigns and contribute our expertise to tackle gambling-related harm, including by strengthening the regulation of gambling operators.

While the reforms in the Gambling White Paper from 2023 are a step in the right direction, the previous government's paper does fall short of curbing the harm caused by gambling in the first place, particularly the constant speed of play and relentless access and promotion. Advancing efforts in these areas by significantly lowering the speed of play, tighter rules on advertising and considering the role of the financial services sector in tackling gambling harms would substantially help people with experience of mental health problems and gambling. These steps would be in keeping with public attitudes towards gambling advertising, with a recent poll finding over half of people polled wanted tighter restrictions on the gambling industry, including strong support for a blanket ban on gambling advertising.<sup>100</sup>

Similarly, increasing regulatory scrutiny is rapidly required to mitigate potential harms from open banking, black market traders, and alternative online payment providers if we are to keep pace with new and emerging forms of gambling harm.

## Conclusion

As this report has explored, there have been significant strides across the banking and regulatory landscapes to begin to consider good outcomes for people at risk of gambling-related harms. But more needs to be done.

Positively, firms do not need to navigate FCA requirements alone. With all firms in the same boat, consumer vulnerability and protection are opportunities for collaboration and innovation across the sector to lead to real and sustained change. Drawing on our collective knowledge and insights from people with lived experience of mental health problems and gambling, the Gambling Harms Action Lab provides an opportunity for firms to partner with others in the sector and with the Money and Mental Health Policy Institute to navigate these challenges together.

### Contact the Gambling Harms Action Lab

If you work in financial services and want to join the Gambling Harms Action Lab (GHAL) or want more information. Please contact:

Nikki Bond, [nicola.bond@moneyandmentalhealth.org](mailto:nicola.bond@moneyandmentalhealth.org).

The Gambling Harms Action Lab is funded from a regulatory settlement approved by the Gambling Commission to work hand in hand with a select group of current account providers. Together, we'll collaborate to explore the shared challenges firms face in tackling gambling harms and develop and test innovative new ways to identify and support customers.

## Endnotes

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- <sup>27</sup> Ibid.
- <sup>28</sup> The Gambling Harms Action Lab is funded from a regulatory settlement approved by the Gambling Commission. Regulatory settlements occur when the Gambling Commission takes regulatory action against a gambling operator for breach of a license condition. Through this process, gambling operators make a payment towards a socially responsible project, instead of a financial penalty.
- <sup>29</sup> Wardle H et al. Gambling behaviour in Great Britain in 2023. NatCen and University of Glasgow on behalf of the Gambling Commission. 2024.
- <sup>30</sup> The 2023 GSGB is the first time the survey has adopted a 'push to web' methodology, using different methods and asking different questions than previous surveys. Changes in methodology and the number of people who take the survey may have skewed the results to be more adverse than in previous years. However, this cannot be known until future GSGB data adopts the same methodology. Therefore, this data is the baseline against which future data can be compared but cannot be compared to previous GSGB data or surveys. The data also cannot be used to estimate levels of gambling or experiences of gambling in the wider population.
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- <sup>51</sup> Gambling Commission. Problem Gambling vs Gambling Related Harm. 2021.
- <sup>52</sup> Wardle H et al. NatCen and University of Glasgow on behalf of the Gambling Commission. Gambling Survey for Great Britain - Year 1, Annual Report Data tables 2023. Table D.12: Proportion who gambled in the past 12 months experiencing potential adverse consequences due to own gambling, within Problem Gambling Severity Index (PGSI) score categories. Total of very often, fairly often, or occasionally.
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- <sup>54</sup> Ibid.
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<sup>73</sup> Latvala T et al. Social disadvantage and gambling severity: a population-based study with register-linkage, European Journal of Public Health, Volume 31, Issue 6, December 2021.

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