



First line of defence

How banks can use transaction data to support customers at risk of or experiencing gambling harm

Introduction

Digital advancements over the past two decades have transformed the gambling landscape beyond recognition, shifting it from a pastime at the local racetrack or betting shop to a multi-billion-pound industry built on its online presence.¹ The opportunity to gamble via the smartphone in our pockets has made gambling accessible 24/7, while constant advertising has normalised and embedded it into daily life.²

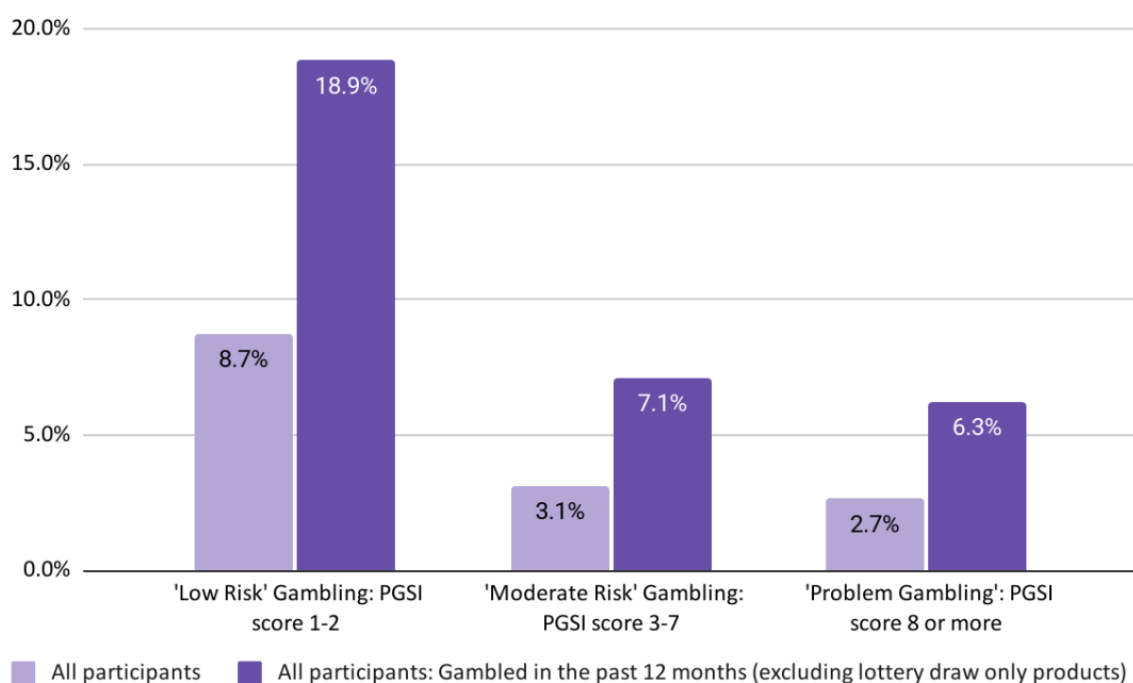
There are two organisations - gambling operators and banks - that have a privileged view of a customer's gambling and as such, have the potential to spot early signs of harm. Whilst action by gambling operators is key, with gambling increasingly happening online, banks have an unparalleled view of customers' online gambling and, importantly, often a holistic view of how someone's gambling interacts with their wider financial circumstances and the financial harms they may be experiencing.

The scale of gambling harms

Gambling harm is a serious public health issue. Recent data from the Gambling Commission found that 1.4 million people in Great Britain (2.7%) were experiencing problem gambling in 2024,³ and a further 6.5 million (11.9%) were at risk of experiencing problem gambling.⁴ While these headline figures are stark enough, they hide the scale and depth of the challenge.

Figure 1 shows how the proportion of people at risk of or experiencing problem gambling rises considerably, to nearly one-third (32.2%) of people, when we consider prevalence rates specifically among people who have gambled in the past 12 months, (excluding respondents who had only played National Lottery or other charity lottery draw-based games).⁵

Figure 1: Prevalence of at-risk and problem gambling in Great Britain - Gambling Survey for Great Britain (GSGB)⁶



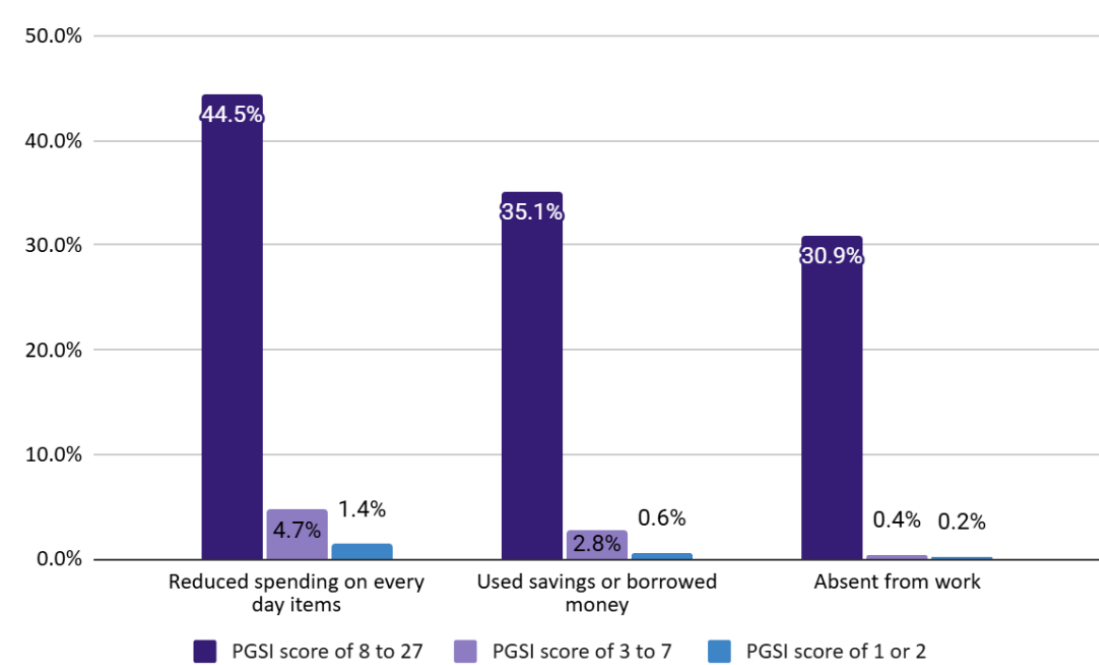
Source: Money and Mental Health analysis of the Gambling Survey for Great Britain 2024, Data Table D.3, Problem Gambling Severity Index (PGSI) distribution of scores, by gambling status.⁷

Notwithstanding differences in financial services' customer bases, this means that current account providers can work on the basis that roughly one in three customers who have gambled in the past 12 months are at risk of or experiencing problem gambling.⁸

The language around 'low and moderate risk' gambling can lead people to believe that this group are 'at risk' of harm but not experiencing actual harm, but this is not the case.⁹ Low and moderate risk groups may or may not have experienced adverse consequences

from gambling, such as an adverse impact on their finances, relationships or health, and the risk of this is likely to increase if they are heavily involved in gambling.¹⁰ While harm is more acutely felt by people experiencing problem gambling, as Figure 2 demonstrates, harm is not confined to this group and can also be experienced by people in moderate-risk groups, and people in low-risk groups are not exempt from experiencing gambling harms either.

Figure 2: Proportion who gambled in the past 12 months experiencing potential adverse consequences due to own gambling, within PGSI score categories - GSGB



Source: Money and Mental Health analysis of the Gambling Survey for Great Britain 2024, Data Table D.17, Proportion who gambled in the past 12 months experiencing potential adverse consequences due to their own gambling very or fairly often.¹¹

“I used to spend so much [on gambling] and leave so little to live off per week, I'd think it's ok, I'll go without food this week and put off this bill until another time. It was horrible and not good for my mental health at all.”

Expert by experience

When we consider these experiences across different demographic groups who've gambled within the past 12 months, a picture of acute harm among a smaller subset of individuals begins to emerge:

- **Men** - are more than twice as likely to experience problem gambling (6.0%), compared to women (2.8%).¹²
- **Young people** - the experience of at risk and problem gambling reduces as we age, with 10.2% of young people aged 18-24 experiencing problem gambling, compared to 5.9% of those aged 35 to 44, and 1.6% of those aged 55 to 64.¹³ Young people aged 18 to 34 are twice as likely to have lost something of significant financial value, such

as their home, business, car or been declared bankrupt because of their own gambling (2.4%), compared to those aged 35 to 54 (1%).¹⁴

- **Among people experiencing problem gambling** - nearly one in five (19%) respondents experiencing problem gambling reported losing their home, job, business, car or having been declared bankrupt due to their own gambling.¹⁵

The support need gap: low uptake of gambling support services

Despite these concerning prevalence rates and evidence of financial harm, uptake of gambling support services remains woefully low, with only one in five (20%) people experiencing problem gambling having accessed specialist help.¹⁶ Less than 3% of people at moderate risk of problem gambling had accessed specific gambling support services.¹⁷ These statistics evidence a huge need support gap, where the people experiencing or at moderate risk of problem gambling are simply not accessing vital gambling support services.

These stark findings are a call to action for all those with a lens on gambling to play their part. Fortunately, banks are one actor with a unique view of a customer's gambling and how it may be beginning to affect their lives. Banks can see not only how much someone is spending, but also how frequently, with which operators, and even the times deposits are made. Through analysing customer transaction data, banks can play a vital role in identifying customers at potential risk and signposting them to external gambling support services and bank gambling support tools to disrupt the pathway to gambling harms.

The political and regulatory case for action

The timing for banks to support customers couldn't be more opportune. The Gambling White Paper: High Stakes: Gambling Reform for the Digital Age shifted the national conversation around gambling toward prevention,¹⁸ reflecting a broader recognition that addressing gambling harms requires more than just treatment for those already affected. Specifically:

- The Office for Health Improvement and Disparities (OHID) is the statutory levy's prevention commissioner. The previous system relied on voluntary contributions from gambling operators for gambling harm prevention, but the new system mandates an annual financial commitment to the services responsible for gambling prevention activities. This signals a change toward proactively reducing harm.
- The Gambling Commission requires operators to track specific behavioural indicators to detect harm.¹⁹ The focus is moving beyond how much people spend to whether they can afford those losses, and the impact on their overall financial well-being. Operators are also now required to proactively look for gambling harms among their customers, undertaking basic and enhanced financial vulnerability checks for customers whose spending hits certain thresholds.²⁰
- Over the past five years, the Financial Conduct Authority (FCA), which regulates financial services providers, has issued guidance for banks on how to support customers. 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.²¹

- 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.²²
- Further impetus for action comes from the Financial Ombudsman Service (FOS), which has seen a significant increase in customer complaints about gambling over the last decade. 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.²³

This policy note

Academic research has shown how transaction data analysis of Open Banking data can reveal indicators of gambling harm.²⁴ In this paper, we build on the work of the Behavioural Insights Team and GamCare to demonstrate how this knowledge can be applied in collaboration with banks as part of a public health approach to reducing gambling harms.^{25 26} This paper aims to provide firms with the knowledge and confidence to test and learn, applying academic research to real-world practice in the use of transaction data analysis, to identify and mitigate gambling harms.

This policy note focuses on the possible indicators of gambling harms that banks could use to identify customers who are at risk of or experiencing gambling harms, and the opportunities to target proactive communications to customers to disrupt the pathway to harm.²⁷ We draw on our work with banks and our Research Community - a group of 5,000 people with lived experience of mental health problems - to evidence the opportunities and appetites for intervention, and make the case for all current account providers to introduce routine analysis of transaction data to better support customers at risk of or experiencing gambling harms. In making this case, we have carefully considered customers' privacy concerns and emphasise the importance of firms testing interventions with people with lived experience of gambling harms, ensuring they provide customers with options to opt out of analysis and targeted support, and strike the right balance between privacy and support.

Perspectives from those on the receiving end of interventions

People who are at risk of or experiencing gambling harms often need support to reduce or abstain from gambling, yet may find it hard to recognise when their gambling is becoming harmful, struggle to accurately recall how much they've spent on gambling,²⁸ or underestimate their losses.²⁹ These challenges are compounded by stigma, shame and secrecy that so often characterise gambling difficulties - all of which combine to prevent people from seeking help.

Fortunately, there is an emerging public appetite for banks to take action to prevent gambling harms. Our 2021 polling found that nearly half (47%) of online gamblers believe banks should do more to help people stay in control of gambling.³⁰

"As responsible financial organisations that are able to recognise gambling patterns on an individual's accounts, you have a duty of care to protect that customer if the negative impacts are clearly highlighted to yourselves."

Expert by experience

Translating indicators into banking practice can be a challenging and thorny task, which requires care and caution. To support firms in their progress, we share four insights from Research Community members on their appetite for interventions and what good practice might look like for bank identification via transaction data analysis.

- **Intervene early** - Gambling difficulty can escalate incredibly quickly.³¹ Participants felt banks have an opportunity to detect and inform customers of support as early as possible.

"It's worth reaching out just in case. It's a slippery slope. And the things that are identifiers for gambling are also identifiers for other support needs, such as poor mental health and dire circumstances."

Expert by experience

- **Take action before harm occurs** - Participants expressed a strong preference for preventative measures and banks intervening before debts and missed payments began to escalate. There was a clear expectation that banks should seek to prevent financial harm when they see it in customers' transaction data and, critically, before it occurs.

"[Gambling] meant that even after payday, I was often still in my overdraft. I was unable to check my bank balance and would hope I had money available. Often the bank gave me [allowed me to withdraw] money which took me over my overdraft limit. It made me feel worthless, a lost cause, and ultimately suicidal. I felt my family would be better if I weren't in their life."

Expert by experience

The more immediate signs banks can see, the stronger the case for action, making the

customer aware that they are at risk of financial distress and providing support. Acting earlier not only protects customers from foreseeable harm, as required by banks' Consumer Duty, but also supports broader well-being needs.

- **Take assertive action when harm is evident** - Where gambling appears to be contributing to escalating debt, participants want immediate action from their bank to prevent foreseeable and escalating financial difficulties. More than six in ten (63%) participants wanted their bank to take immediate action (such as freezing their account) if they saw them gambling with borrowed money via their overdraft.³² Similarly, over six in ten (61%) participants wanted their bank to take immediate action if they missed essential payments such as rent, mortgage or bills and were gambling on their account,³³ and over half (53%) wanted immediate action if they gambled before paying essential bills.³⁴

"It would be in my best interest if the bank took action to protect me and my home from the repercussions of heavy gambling. I would prefer that 'embarrassment' rather than lose my home."

Expert by experience

- **Alert customers to changes in gambling behaviours** - Participants spoke of how, at the very least, they expected their bank to notify them of significant changes in gambling behaviour, such as spending far more than usual or gambling without breaks (potentially indicated by frequent deposits in quick succession). Participants viewed these behavioural changes, such as increased spending or gambling at night, as the right moment for banks to step in. People felt these moments were a clear opportunity to reach out with an informative message about support. Banks are uniquely well-positioned to detect changes in customer behaviour and alert customers to prevent harm.

"Look for changes in spending patterns, am I using my overdraft more than normal, am I increasing my overdraft limit or draining money from my savings account to cover my increased spending."

Expert by experience

"[My bank would have seen] large withdrawals around payday, little or no money left for the rest of the month."

Expert by experience

Participants reported how they expect proactive communication from their bank when patterns of gambling may suggest difficulty. Nine in ten (91%) participants reported that they wanted their bank to take some action in response to observing gambling patterns that might indicate they were struggling, with less than one in ten (9%) reporting that they did not want their bank to take any action.³⁵ With this clear appetite for action, there were differences of opinion on quite what that action should be. Nearly three-quarters of participants (72%) want their bank to send them information about spending limits they could put on their gambling spend,³⁶ and seven in ten (70%) participants said they wanted their bank to send information about the Bank Gambling Block.³⁷

Current account indicators of gambling harms

Banks have a unique opportunity to intervene and disrupt pathways to gambling harms, and a regulatory imperative to do so.

With that in mind, we now turn to the indicators banks could use to identify customers at risk of, or experiencing problem gambling. While no single metric or combination of indicators can *definitively* predict gambling harm, we split potential indicators into three broad categories: a) spending, b) behavioural and c) affordability - to guide firms in designing identification models. We discuss each of these in turn below.

Spending indicators

- **Value of gambling spend** - Gambling spend is one of the most reliable and widely used indicators of harm, which banks can measure in two ways: a) total deposit spend - deposits to gambling operators from their current account, or b) net spend - deposits to gambling operators minus the money a customer wins, which captures specifically financial loss from a customer's account. Both indicators provide valuable insights. Net spend more accurately reflects the financial loss from an account, while total deposit spend can indicate how much an individual is willing to risk.
- **Value of gambling spend proportionate to income** - Where firms have income figures for customers, they can form a picture of a person's gambling spend proportionate to their income. For each of these value metrics, firms can categorise individuals into low-, medium-, and high-risk gambling groups, enabling the design of appropriate interventions.

Behavioural indicators

- **Volume of gambling transactions** - A high number of deposits across a month indicates deeper engagement with gambling. Rising frequency of transactions across a short period of time may reflect binge gambling or even chasing losses.³⁸ While frequent small deposits can sometimes indicate attempts to control spending, a high volume remains a signal that someone might be at risk of gambling harm. Whether signalling escalating risk or efforts to limit gambling, transaction volume may identify a customer who could benefit from proactive messages of support.
- **Gambling across multiple operators** - Gambling across multiple operators is associated with increased gambling risk. This is because multiple operators might be a valuable proxy for multiple modes of gambling, which is associated with increased harm.³⁹
- **Gambling at night and/or into the early hours** - A higher percentage of overnight gamblers were found to be experiencing problem gambling than those who gambled at other times of the day.⁴⁰ Whilst banks can't see exactly when a customer is gambling, they can see when they are depositing funds and may be seeking to gamble.

Affordability indicators

Firms can begin to identify customers at risk of gambling harms using a spending or behavioural indicator, or, for firms that remain cautious about intervening, a combination of both. However, as banks can situate gambling within a customer's broader financial circumstances, they can also utilise existing affordability measures or overlay spending or behavioural indicators with an affordability lens. Potential affordability indicators could include:

- **Gambling directly after receiving a payment** - including payday, benefit payments or loans could point to a potentially difficult relationship with gambling.
- **Gambling and missed essential payments** - banks can detect missed or bounced payments and track changes in spending patterns over time, providing early insight into when gambling may be causing serious financial stress.
- **Gambling with borrowed funds** - banks can see when someone is gambling in their overdraft. Survey evidence from the Gambling Commission showed overdraft usage for gambling was higher amongst problem gamblers (28%) versus those not at-risk (1%).⁴¹ Unlike gambling with disposable income, gambling with borrowed money can quickly create debt that customers can struggle to pay back. Gambling with borrowed funds can also reinforce harmful gambling patterns, as individuals may feel pressured to chase losses and win back lost money.

Thresholds for intervention

Above, we have identified eight potential current account-facing indicators to support firms in undertaking transaction data analysis to identify customers at risk of gambling-related harms. However, agreeing on the indicators a firm intends to use is only the first step in identifying potentially at-risk customers. Banks must then decide upon the thresholds they'll use to identify customers as potentially low, medium or high risk. While a significant amount of work has been done to understand operator-led thresholds, specifically regarding the value of gambling spend to inform the introduction of financial risk checks,⁴² there is less guidance for banks on how to apply the academic literature around spending, behavioural or affordability indicators of gambling harms and potential thresholds for intervention.

The work by banks such as Lloyds, HSBC UK and Santander in this space is innovative, with models and thresholds being iterated and refined repeatedly through pilots and a test-and-learn approach. Therefore, when deciding on thresholds to guide identification and intervention, we share some insights from academic research to guide firms' thinking. When segmenting customers into different risk cohorts based on spending or behavioural indicators, firms could take the following approaches:

- **Value of gambling spend** - align gambling spend thresholds with those set out in the Gambling Act Review White Paper,⁴³ e.g. £125 net loss (the proxy for banks may be deposits minus wins) per month equates to customers at moderate risk, while a £1,000 net loss within 24 hours or £2,000 within 90 days can be interpreted as high risk gambling.⁴⁴ Alternatively, firms may want to identify the average gambling spend across all of their customers who gamble and, based on this, agree on low, medium,

and high thresholds that feel relevant to their own customer base, an approach taken by HSBC UK in their work with the Behavioural Insights Team Patterns of Play report.⁴⁵

- **Value of gambling spend proportional to income** - Firms who wish to intervene more preventatively could use the Lower Risk Gambling Guidelines, which recommend not gambling more than 1% of your household income before tax per month as a baseline for risk cohorts.⁴⁶ Therefore, for the average gross monthly salary in the UK of £2,886,⁴⁷ this would be £29 per month. Or for a customer on the basic rate Universal Credit of £400.14, this would be £4 per month.⁴⁸
- **Volume of gambling transactions** - use the Lower Risk Gambling Guidelines, which recommend gambling no more than four days per month.⁴⁹ While firms do not have an exact lens on when people gamble, again, they could use deposits as a proxy. Alternatively, studies identify that three or more deposits within a 12-hour period are characteristic of chasing losses.⁵⁰

Firms that are concerned about intervening based on spending or behavioural indicators alone could triangulate the above with an affordability indicator. While this triangulation provides greater assurance to firms that they are communicating with customers at the greatest risk, it means firms will miss communicating with customers at more moderate risk - and, importantly, after financial harm has occurred - not in the spirit of preventing foreseeable harm as set out in the Consumer Duty.

Some banks are already using gambling indicators to better support customers

The Gambling Harms Action Lab brings together seven firms to tackle precisely this type of complex and challenging issue. The approach creates an environment where firms that typically compete can collaborate and learn from one another's successes and failures. The indicators firms choose to use, and where they pitch thresholds for segmenting customers into low, medium and high risk groups, rest on balancing several key tensions, including:

- **Firms' appetites for intervention** - balancing tensions around privacy, concerns about overstepping their role, and fears of generating complaints.
- **Firms' appetites for prevention** - with the wealth of data firms have at their disposal, they can choose their appetite for intervening at a more preventative end of the scale, such as for customers potentially at a low or moderate risk of gambling harms, or for those with a lower risk appetite they may choose to simply intervene with customers in higher risk groups where harm appears to be more acute and immediate.

While utilising transaction data may appear daunting, the good news is that banks are not starting from scratch, as they already do so in other areas of practice. Banks already routinely analyse transaction data to anticipate customer needs and act before problems escalate. Some examples include:

- **Fraud detection** - systems to detect suspicious transactions, intervene quickly and contact customers to prevent financial loss.
- **Financial resilience** - monitoring customer transactions to identify low financial resilience, proactively reaching out to customers when signs of strain appear, such as when a customer is consistently using their overdraft facility.
- **Lending and collections** - assessing customer transaction data to determine repayment capacity or engage with customers at risk of arrears.

Some banks are leading the charge in analysing transaction data to identify customers at risk of or experiencing gambling harms. Lloyds,⁵¹ Santander,⁵² and HSBC UK, as evidenced in the case study on the next page, are already doing this,⁵³ and demonstrating leadership in the protection of customers in vulnerable circumstances.⁵⁴

HSBC UK case study

HSBC UK and first direct have been analysing existing transactional data since 2023 to identify customers who exhibit spending patterns and behaviours indicative of potential gambling difficulties. The firms segment customers who meet thresholds into three groups: high risk, medium risk, and low risk of experiencing gambling difficulties.

Building on this initial analysis, HSBC UK piloted a proactive communications campaign targeting customers within the high-risk group to support them in engaging with available support options, including information about the Bank Gambling Block, an option to reduce ATM withdrawal amounts and information on external support services.

Customers who are identified monthly as displaying potentially high-risk spending and behavioural indicators of gambling difficulties are proactively nudged towards information about the tools and support available to them. Following the pilot, the activity became 'business as usual'.

In 2025, first direct took this further, launching a 'business as usual' contact strategy for customers who are either at high risk or medium risk of gambling harm, according to the spending and behavioural indicators within the model, as part of its commitment to protecting customers from foreseeable harm, as per the FCA's Consumer Duty.

Concerns about what might go wrong

People with experience of gambling harms want their bank to offer greater protection and support. This is also in line with legal requirements from the FCA's Consumer Duty.⁵⁵ However, we recognise that some firms are hesitant to act, and in this section, we examine five key challenges banks should consider when intervening.

Accuracy of contacting customers earlier - warning signals are not definitive proof that someone is experiencing gambling difficulty or harm. For every indicator and threshold that might indicate difficult gambling behaviour, there could be an alternative explanation. For instance, banks can detect when someone is depositing money into a gambling company, but they can't see how much is being gambled once the money has been deposited. Banks also can't know every gambling spend that takes place for the following reasons:

- Transactions are coded using Merchant Category Codes (MCCs), but banks cannot capture unlicensed operators and faster payments via MCCs.
- Gambling still takes place with cash, which banks can't monitor. This is particularly difficult for people who experience harm and want to avoid detection of gambling.⁵⁶
- Customers may gamble from multiple accounts. One current account provider may not have a complete understanding of a customer's finances and could assume a higher level of financial vulnerability than actually exists.

Banks face a clear choice: limit customer contact and risk missing real cases of harm, or accept that alerts may identify some customers as being at a lesser or greater risk than they really are. The harm-reduction approach embraces the latter - provided that communication is informative, respectful, and free from judgment. False positives are inevitable, but early, supportive outreach can reach people at the right moment, protect those in need, and strengthen trust and goodwill across the customer base.

Data protection considerations - banks often cite data protection as a key barrier to this type of work. However, while protecting customer data should be a key focus for any bank, firms can sometimes present concerns about data protection as a barrier to progressing this work, when what they actually mean is concerns about customer privacy, the risk of upsetting customers, or the potential to be perceived as overstepping their role. Banks embarking on this should work with their data protection teams to ensure their terms and conditions for using customer data protect both the bank's and the customer's interests.

Customer autonomy and overstepping the role of a bank - customers have a choice about how they spend their money and what they do with it. Banks have understandable concerns about being perceived as telling people how to spend their money. People who have difficulty with gambling often find it challenging to recall how much they have spent or how much time they've invested in gambling.⁵⁷ Proactive communication with customers is not intended to infringe upon a customer's right to spend, but rather to inform them about their financial position and provide the resources they may need to make an informed decision about their spending.

Customer privacy - customers may feel uneasy about privacy or perceive a bank's outreach as 'being watched.' Banks may have related concerns about whether they are the right organisation to contact customers. This is particularly sensitive. Banks should carefully design outreach to reassure customers that seeking support will not affect other banking decisions. This principle must be embedded in policy and clearly communicated to ensure trust and minimise distress.

Generating complaints - banks are concerned that proactively communicating with customers might lead to complaints. Complaints are costly for banks and take up resources. Any successful intervention must strike a balance between supporting customers and preventing an escalation of complaints. Banks that have started proactively reaching out to customers⁵⁸ have reported minimal to no complaints so far, with some banks receiving positive feedback from customers. Not only this, but banks must consider the cost of not supporting customers. Of the decisions on gambling in the last ten years by the FOS, over half (53%) have been upheld.⁵⁹ Some themes of the upheld complaints include where banks reasonably would have seen and could have prevented harm.⁶⁰

Firms that are concerned about balancing these tensions but who also remain committed to preventing foreseeable harm can adopt a 'test and learn' approach. By initially designing interventions and communications for customers in higher-risk groups, monitoring and evaluating their effectiveness, and carefully expanding interventions and targeting proactive communications to customers in medium- or low-risk segments, firms can develop stronger, more effective iterations of communications over time. Firms have the opportunity to do this while part of the Gambling Harms Action Lab, testing communications with people with lived experience of gambling and gambling harms to ensure their messages are grounded in research and evidence.

Recommendations

Banks are not the cause of customers experiencing gambling difficulties, but it is essential that they utilise their unique position, with sight of transaction data and their role as a trusted source of financial information, to intervene and support customers before they encounter financial difficulties due to gambling. Below, we set out a primary recommendation:

Banks should monitor customers' accounts for spending and behavioural indicators of gambling harms and reach out with targeted proactive offers of support. Banks should carefully balance customers' privacy concerns with the need to act to provide support and prevent harm. The research suggests that, on balance, customers support this work; however, interventions should continue to be developed with meaningful input from people with lived experience of gambling harms, and firms should ensure customers are given opportunities to opt out of analysis and targeted support should they wish.

Indicators of harm should include at least one of each of the following:

- **Spending indicator** - what proportion of customers' disposable income is being spent on gambling? These groups should be segmented into high, medium and low-risk groups for proactive communication. Where firms lack income information or the technical resources to identify gambling spend relative to income, they can take a lead from others in the sector, such as HSBC UK, by identifying the average gambling spend among their customer base and segmenting customers into low, medium, or high-risk categories.
- **Behavioural indicator** - are customers gambling consistently or inconsistently? Has this changed? Monitor for sudden changes to gambling behaviour. Has spending increased? Has the volume of deposits to gambling operators escalated? Are customers gambling at night or in the early hours of the morning?

Each firm will have its own method for identifying individuals at risk of gambling harms. Utilising the dual perspective of spending and behavioural indicators ensures a sound basis for identifying customers at potential risk and providing support.

Overlay gambling spending and behaviour patterns with financial vulnerability data - where firms are concerned about communicating with customers based on one spending or behavioural indicator, banks should overlay gambling spending and behaviour patterns with financial vulnerability data to help distinguish between customers for whom gambling poses little risk and those for whom it is having serious financial consequences. Problem debt, low savings and the use of overdrafts could be indicators that gambling might be impacting someone's life. Is the customer spending on gambling and regularly missing essential bill payments? Are they regularly gambling in their overdraft facility, or gambling as soon as their wages are paid, before making rent, mortgage, or essential payments?

There will rarely be definitive indicators that a customer is experiencing gambling harm. Yet, our research with people with lived experience of gambling and gambling harms finds that this approach to identification, *alongside proactive, supportive communications that utilise the design principles set out below*, should ensure that messages are well received.

Beyond this primary recommendation, below we draw on the insights from our Research Community to present five principles to support firms in implementing gambling transaction data analysis:

1. **Intervene earlier to prevent gambling harm** - monitoring customer data and behaviour, current account providers can spot warning signals and intervene early, helping to prevent foreseeable harm.
2. **Be transparent about the use of transaction data** - clearly explain to customers how their transaction data is analysed to assess potential gambling risk, building trust and confidence.
3. **Communicate in a non-judgmental and respectful way with customers** - be open and honest with customers about why you're contacting them, what indicators prompted contact and the risk to their finances.
4. **Commit to continuous improvement by regularly reviewing the effectiveness of transaction analysis models** - refining algorithms based on best practices, lived experience insights and emerging evidence.
5. **Introduce targeted interventions for younger people** - young people are at the acute end of gambling harm, with rates of gambling difficulty almost double that of the national population.⁶¹ More concerning than this, young people are overrepresented in financial vulnerability areas, such as using high-cost credit and inability to pay back credit cards.⁶² At the start of their financial lives, these experiences shape future gambling behaviour, access to finances and life chances.⁶³ Banks should explore targeted interventions specifically designed for student accounts. This could include auto BGBs or lower thresholds for spending indicators on student accounts.

This policy note would not be complete without acknowledging the role of other stakeholders who can intervene to support banks in progressing this work:

- **The FCA should emphasise and encourage best practice across the sector** - when it comes to banks working towards preventing foreseeable harm from gambling and ensuring good outcomes for customers.
- **UK Finance should lead collective work from banks to safeguard customers** - from gambling-related financial harm as standard.
- **UK Research & Innovation should fund further research and evaluation into using banking transaction data** - to further understand gambling harms.

Conclusion and next steps

The nature of gambling harms means that the negative consequences are often hidden, can escalate rapidly and often have severe impacts on many aspects of people's lives. It's vital to seize every opportunity to prevent harm. Without objective banking data and timely interventions, those who need help may not receive it until it's too late.

While banks may understandably embark on this process tentatively, initially designing models and interventions for high-risk segments, work should not stop here. Even low levels of gambling can be associated with harm.⁶⁴ Therefore, we should not focus our efforts solely on supporting customers at the acute end of harm, but instead use this opportunity to learn about what works and what doesn't - around bank-led indicators of harm and also communications with different risk groups - and expand interventions to prevent foreseeable harm for customers across the risk spectrum.

No single bank can tackle gambling harm on its own; sector-wide collaboration is essential. That is why collaboration is at the heart of the Gambling Harms Action Lab, where we're working with seven banks to improve identification and support of gambling harms.⁶⁵ Aligning on indicators of harm and coordinated responses will not only strengthen customer protection but also advance understanding of how to apply research to practice. By pairing clear, transparent communication with respect for customer choice and autonomy, banks can turn intent into meaningful action.

Endnotes

¹ Gambling Commission. Industry Statistics - November 2024 - Superseded: Official statistics. 2024.

² GambleAware. [New study shows Britain lags behind Europe on restricting gambling marketing](#). 2024.

³ Wardle H et al. Gambling behaviour in Great Britain in 2024. NatCen and University of Glasgow on behalf of the Gambling Commission. Gambling Survey for Great Britain - Year 2, Annual Report Data tables 2024. Table D.4: Problem Gambling Severity Index (PGSI) distribution of score categories for all participants, by sex, age and country.

⁴ Population level figures extrapolated from from 2024 mid-year estimates.

⁵ Wardle H et al. Gambling behaviour in Great Britain in 2024. NatCen and University of Glasgow on behalf of the Gambling Commission. Gambling Survey for Great Britain - Year 2, Annual Report Data tables 2024. Table D.3: Problem Gambling Severity Index (PGSI) distribution of scores, by gambling status.

⁶ 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. 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. At moderate risk of problem gambling, someone may be experiencing adverse consequences from gambling.

⁷ Wardle H et al. Gambling behaviour in Great Britain in 2024. NatCen and University of Glasgow on behalf of the Gambling Commission. Gambling Survey for Great Britain - Year 2, Annual Report Data tables 2024. Table D.3: Problem Gambling Severity Index (PGSI) distribution of scores, by gambling status.

⁸ On products excluding the lottery draw.

⁹ 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. 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. At moderate risk of problem gambling, someone may be experiencing adverse consequences from gambling.

¹⁰ Gambling Commission. [Problem gambling screens](#). Accessed (17/11/25).

¹¹ Wardle H et al. Gambling behaviour in Great Britain in 2024. NatCen and University of Glasgow on behalf of the Gambling Commission. Gambling Survey for Great Britain - Year 2, Annual Report Data tables 2024. Table D.17: Proportion who gambled in the past 12 months experiencing potential adverse consequences due to own gambling, within Problem Gambling Severity Index score categories (PGSI).

¹² Wardle H et al. Gambling behaviour in Great Britain in 2024. NatCen and University of Glasgow on behalf of the Gambling Commission. Gambling Survey for Great Britain - Year 2, Annual Report Data tables 2024. Table D.5: Problem Gambling Severity Index (PGSI) distribution of score categories, for those who had gambled in the past 12 months, by sex, age and country

¹³ Ibid.

¹⁴ Wardle H et al. Gambling behaviour in Great Britain in 2024. NatCen and University of Glasgow on behalf of the Gambling Commission. Gambling Survey for Great Britain - Year 2, Annual Report Data tables 2024. Table D.11: Proportion who gambled in past 12 months experiencing severe consequences due to own gambling, by sex, age and country.

¹⁵ Wardle H et al. Gambling behaviour in Great Britain in 2024. NatCen and University of Glasgow on behalf of the Gambling Commission. Gambling Survey for Great Britain - Year 2, Annual Report Data tables 2024. Table D.16: Proportion who gambled in the past 12 months experiencing each severe consequence due to own gambling, within Problem Gambling Severity Index score categories (PGSI).

¹⁶ Wardle H et al. Gambling behaviour in Great Britain in 2024. NatCen and University of Glasgow on behalf of the Gambling Commission. Gambling Survey for Great Britain - Year 2, Annual Report Data tables 2024. Table D.15: Proportion who gambled in the past 12 months seeking help, support or information in the last 12 months due to own gambling, by Problem Gambling Severity Index (PGSI) score categories.

¹⁷ Ibid.

¹⁸ UK Government. [High Stakes: gambling reform in the digital age](#). 2023.

¹⁹ Gambling Commission. [License conditions and codes of practice](#). s.3.4.3. (Accessed: 17/11/25).

²⁰ Gambling Commission. [Licensees and businesses financial vulnerability checks](#). 2023. (Accessed: 17/11/25).

²¹ Financial Conduct Authority. Guidance for firms on the fair treatment of vulnerable customers. 2021.

²² Financial Conduct Authority. A New Consumer Duty. 2022.

²³ Hornle J et al. A Unique Position and a Difficult Challenge: Banks Support of Individuals Experiencing Gambling-Related Financial Harm. Queen Mary. 2024.

²⁴ Muggleton N et al. The association between gambling and financial, social, and health outcomes in big financial data. 2021.

²⁵ McNair S et al. [Dealing new data: What bank transactions can tell us about gambling behaviour](#). The Behavioural Insights Team. 2021.

²⁶ GamCare October (2024). Transaction monitoring for harmful gambling and proactive interventions: Gambling Related Financial Harm Workshop #9. London, UK.

²⁷ This paper does not provide detailed guidance on customer communications, interventions or prescribe how banks should implement transaction data analysis as every bank is different.

²⁸ Heirene RM, Wang A, Gainsbury SM. Accuracy of self-reported gambling frequency and outcomes: Comparisons with account data. *Psychol Addict Behav*. 2022 Jun;36(4):333-346.

²⁹ Collard S, Cross K. Gambling, Vulnerability and FCA Compliance. Personal Finance Research Centre. University of Bristol. 2021.

³⁰ Holkar M, Lees C. A Safer Bet? Online gambling and mental health. Money and Mental Health Policy Institute. 2020.

³¹ Slutske W et al. Telescoping and Gender Differences in the Time Course of Disordered Gambling: Evidence from a General Population Sample. 2014.

³² Money and Mental Health survey. Base for this question: 179 respondents with experiences of gambling and mental health problems.' Survey was open 14 May to 28 May 2025.

³³ Money and Mental Health survey. Base for this question: 182 respondents with experiences of gambling and mental health problems.' Survey was open 14 May to 28 May 2025.

³⁴ Money and Mental Health survey. Base for this question: 180 respondents with experiences of gambling and mental health problems.' Survey was open 14 May to 28 May 2025.

³⁵ Money and Mental Health survey. Base for this question: 47 respondents with experiences of gambling and mental health problems.' Survey was open 14 May to 28 May 2025.

³⁶ Money and Mental Health survey. Base for this question: 42 respondents with experiences of gambling and mental health problems. Survey was open 12 March to 26 March 2025.

³⁷ Ibid.

- ³⁸ Ghaharian, K et al. Across the Bettor-Verse: an Open Banking perspective on gambling in the United Kingdom. 2025.
- ³⁹ Dinos S et al. Patterns of Play: Summary report. 2022.
- ⁴⁰ GREO. An examination of the link between chronotypes, decision-making styles, and gambling behaviour. 2024.
- ⁴¹ Gambling Commission. Consultation on gambling with credit cards. 2019.
- ⁴² Murphy. S. Open banking data modelling of gambling spend thresholds. Gambling Commission. 2024
- ⁴³ UK Government. High Stakes: gambling reform in the digital age. 2023.
- ⁴⁴ GamCare October (2024). Transaction monitoring for harmful gambling and proactive interventions: Gambling Related Financial Harm Workshop #9. London, UK.
- ⁴⁵ Behavioural Insights Team. Gambling behaviour: What can bank transaction data tell us? A feasibility study. [Part 2: Analysis of HSBC UK customer data](#). 2021. Accessed: (17/11/25).
- ⁴⁶ Canadian Centre on Substance Use and Addiction. [The Lower-Risk Gambling Guidelines](#). 2024.
- ⁴⁷ ONS. [Earnings and employment from Pay As You Earn Real Time Information](#), UK: June 2025. Accessed: (17/11/25).
- ⁴⁸ Gov.UK. [Universal Credit](#). Accessed: (17/11/25).
- ⁴⁹ Canadian Centre on Substance Use and Addiction. [The Lower-Risk Gambling Guidelines](#). 2024.
- ⁵⁰ Auer, M and Griffiths, M. [An empirical attempt to identify binge gambling utilizing account-based player tracking data](#). 2023.
- ⁵¹ Muggleton N et al. The association between gambling and financial, social, and health outcomes in big financial data. 2021.
- ⁵² GamCare October (2024). Transaction monitoring for harmful gambling and proactive interventions: Gambling Related Financial Harm Workshop #9. London, UK.
- ⁵³ The behavioural Insights Team. Gambling behaviour: What can bank transaction data tell us? 2021.
- ⁵⁴ Financial Conduct Authority. Guidance for firms on the fair treatment of vulnerable customers. 2021.
- ⁵⁵ Financial Conduct Authority. A New Consumer Duty. 2022.
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- ⁵⁷ Heirene RM, Wang A, Gainsbury SM. Accuracy of self-reported gambling frequency and outcomes: Comparisons with account data. Psychol Addict Behav. 2022 Jun;36(4):333-346.
- ⁵⁸ GamCare October (2024). Transaction monitoring for harmful gambling and proactive interventions: Gambling Related Financial Harm Workshop #9. London, UK.
- ⁵⁹ Hornle J et al. A Unique Position and a Difficult Challenge: Banks Support of Individuals Experiencing Gambling-Related Financial Harm. Queen Mary. 2024.
- ⁶⁰ Ibid.
- ⁶¹ Collard S, Cross K. Gambling, Vulnerability and FCA Compliance. Personal Finance Research Centre. University of Bristol. 2021.
- ⁶² Ibid.
- ⁶³ UK Government. High Stakes: gambling reform in the digital age. 2023.
- ⁶⁴ University of Oxford. Oxford gambling study: The 'fun' can stop with financial problems, addiction, unemployment, ill-health and even death. 2021. Accessed: (17/11/25).

⁶⁵ The Gambling Harms Action Lab is funded through a regulatory settlement by the UK Gambling Commission. When the Gambling Commission takes regulatory action against a gambling operator, one of the outcomes of that action can be a payment in lieu of the financial penalty the Commission might otherwise impose for breach of a licence condition. The Gambling Commission regularly reviews proposals for destinations of regulatory settlements and awarded funding for the Gambling Harms Action Lab project in July 2023.

