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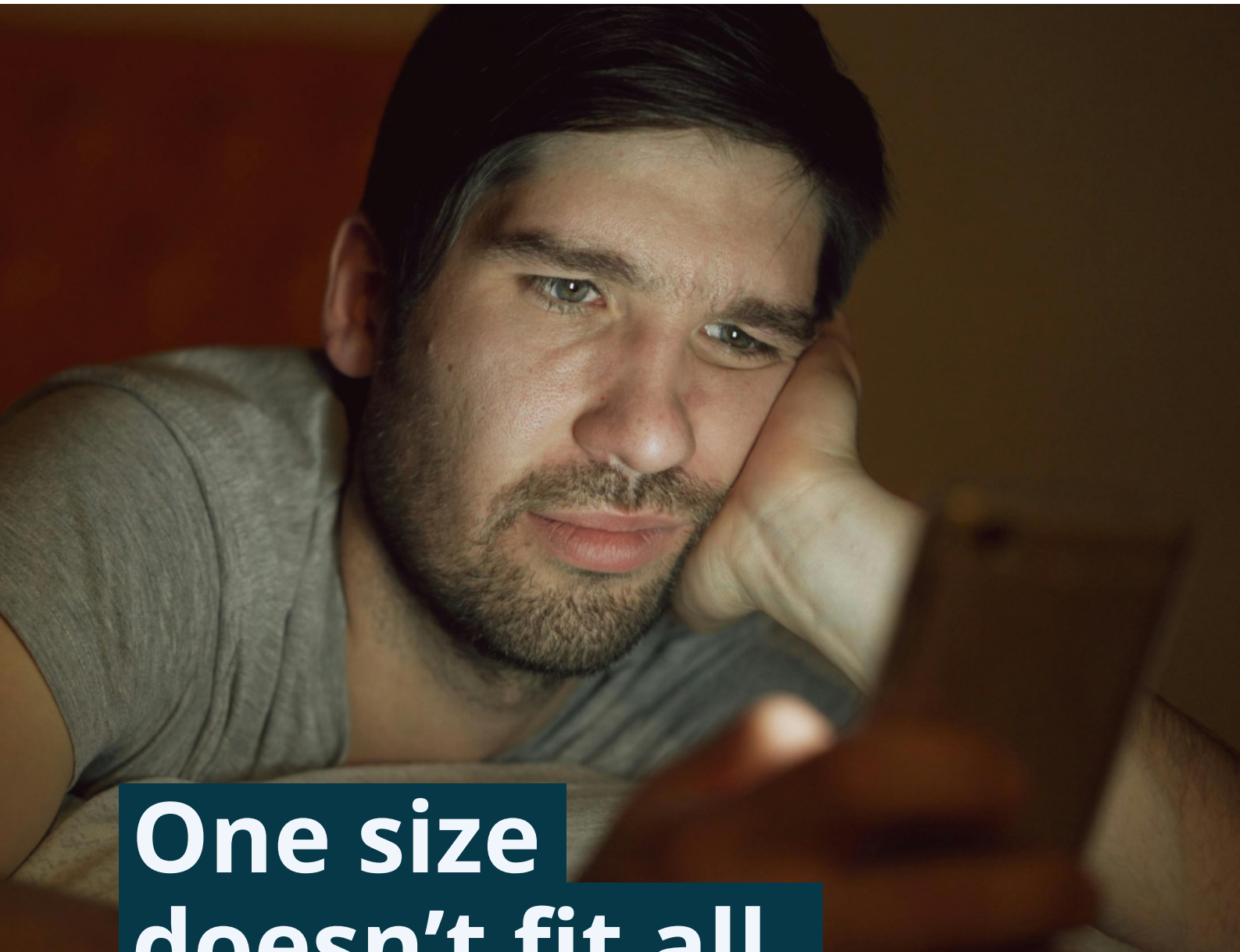


GAMBLING HARMS
ACTION LAB

BY MONEY AND MENTAL HEALTH
FOR FINANCIAL SERVICES

October 2026

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One size doesn't fit all

Designing customer-centred gambling
harms engagement strategies

Introduction

For some, gambling can lead to significant harm – including harm to people’s finances, relationships and mental health. With gambling products designed to maximise engagement, it can be hard for an individual to change their gambling behaviour, even if they have the desire, motivation and ability to. Banks and building societies are well placed to support customers who want to change the way they gamble – whether that’s the customer who wants to spend a little less on gambling, or the customer who is experiencing significant harm as a result of their gambling.

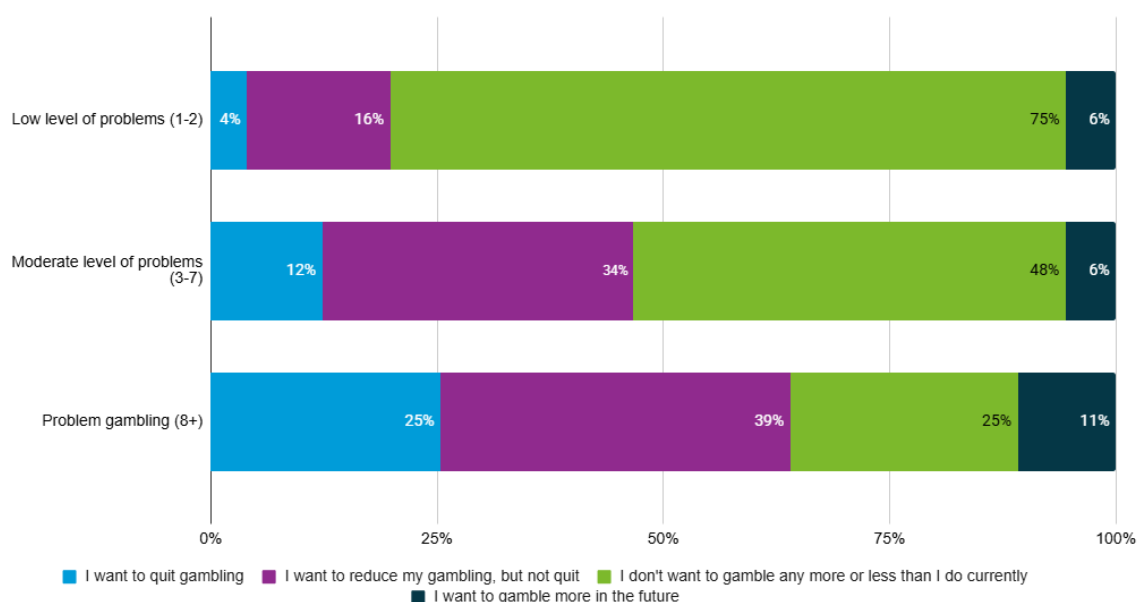
This guidance is designed to help current account providers to consider the different stages a customer may go through when attempting to change their gambling, and the most effective ways to support them at each stage. It is particularly aimed at teams involved in the day-to-day design, delivery and evaluation of gambling harm engagement strategies, as well as those working on vulnerability, customer care and conduct and compliance. The aim is not to classify customers based on these stages but to ensure that a bank’s overall strategy on gambling harms includes providing interventions and tools that reach people at all stages in this journey and enable them to make the changes they want to make.

Many people who gamble would like to change their behaviour

The scale of gambling harm in Great Britain is vast. The Gambling Commission's Gambling Survey for Great Britain (GSGB) 2024 found that among people who have gambled in the past 12 months, nearly one-third (32%) are at risk of or experiencing problem gambling, defined as those who scored one or more on the Problem Gambling Severity Index (PGSI). The PGSI consists of a series of questions which are used to measure both behavioural symptoms of gambling disorder and adverse consequences from gambling.¹ This means that current account providers can assume that roughly one in three customers who have gambled in the past 12 months are at risk of or experiencing problem gambling.²

Many people want to change their gambling behaviour too. According to GambleAware's Annual GB Treatment and Support Survey 2023, nearly two-thirds (64%) of people experiencing problem gambling (those with a PGSI score of more than eight) said that they wanted to either quit or reduce their gambling.³ It's not only those at the most acute end of harm who want to change their gambling; one in five (20%) of those with low levels of problems, and nearly half (47%) of those with moderate levels of problems, said that they wanted to quit or reduce their gambling.⁴

Figure 1: Proportion of people who want to quit or reduce their gambling by PGSI score



Source: GambleAware's Annual GB Treatment and Support Survey 2023. Question G5. "Which of the following best describes your current thoughts on your own gambling?" Base: 11,051.

¹ 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. Numbers extrapolated from 2.7% of adults in Great Britain from 2024 mid-year estimates experiencing problem gambling, and 11.9% of adults in Great Britain from 2024 mid-year estimates at risk of problem gambling.

² Gambling with products excluding the lottery draw.

³ Gosschalk K et al. [Annual GB treatment and support survey 2023](#). YouGov on behalf of GambleAware. 2023..

⁴ Gosschalk K et al. [Annual GB treatment and support survey 2023](#). YouGov on behalf of GambleAware. 2023.

Current account providers have a privileged view of their customers' spending behaviour. This means they are uniquely positioned to identify potential indicators that gambling harm may be arising.⁵ Where appropriate, firms can use these insights to offer support that is consistent with the Financial Conduct Authority's Consumer Duty.⁶ This includes taking reasonable steps to help customers avoid foreseeable harm and supporting them to pursue their financial objectives.⁷

Financial services firms can not only see how much we gamble but also key behavioural indicators of harm, such as gambling late at night, chasing losses, or gambling across multiple operators.⁸ Moreover, as they can see the wider financial circumstances as the context to our gambling, current account providers can look for indicators that might suggest where our gambling might be leading to harm – for example, gambling before paying rent, or relying on an overdraft to fund gambling.

One in six (16%) customers who gamble want to reduce or quit their gambling.⁹ However, these customers will be at different stages of understanding and evaluating their relationship with gambling. Firms should therefore consider how to best support customers at varying levels of readiness to change. For some, abstinence-based tools like a Bank Gambling Block (BGB) will be exactly what a customer wants and needs; for others, a strict all-or-nothing abstinence tool may feel too extreme, and people may want alternative levels of support from their bank.

The ideas we provide here are rooted in behavioural change theory and designed to serve as a jumping-off point for firms as they design their proactive engagement strategies. As with all Action Lab work, our work in the Gambling Harms Action Lab (please see appendix for more details) is intended as a practical starting point rather than a prescriptive approach. We encourage firms to adopt a test-and-learn mindset, using pilots and evaluation to understand what works best for their customers and context. We also encourage firms to share their learning and emerging good practice across the sector, to help strengthen the evidence base and create better outcomes for customers at risk of or experiencing gambling harms.

Why readiness to change matters

Regardless of desire or motivation, behaviour change is hard. As anyone who has tried to eat healthier, stick to a regular exercise regime, or give up smoking can attest, wanting to change your behaviour and taking the sustained action required to do so are two entirely different things. On top of this, the stigma and shame that continue to surround gambling means that people who would like to change their relationship with gambling can struggle to reach out for the support they need to help them make these difficult changes.^{10 11}

⁵ Lee J, Crossley E. [Gambling in the red](#). Money and Mental Health Policy Institute. 2026.

⁶ Financial Conduct Authority. [A New Consumer Duty](#). 2022

⁷ Financial Conduct Authority. [FG22/5 Final non-Handbook Guidance for firms on the Consumer Duty](#). 2022

⁸ Clifton L, Bond N, and Heffron J. [Shining a light](#). Money and Mental Health Policy Institute. 2024.

⁹ Gosschalk K et al. [Annual GB treatment and support survey 2024](#). YouGov on behalf of GambleAware. 2024.

¹⁰ Lloyd J et al. [Stigmatisation and discrimination of people who experience gambling harms in Great Britain: Synthesis report](#). National Centre for Social Research. 2025.

¹¹ Fulton C. [Secrets and secretive behaviours: exploring the hidden through harmful gambling](#). Library and Information Science Research, 41(2). 2019.

When firms design gambling harm engagement strategies, they should consider a key factor that can influence the effectiveness of their interventions: the customer's readiness to change. Even among customers who express a desire to modify their gambling behaviour, individuals may be at very different stages in terms of their motivation, commitment, and preparedness to take action. Some may only just be recognising that gambling is becoming harmful, while others may already be actively seeking tools and support to help them change.

By designing interventions with this in mind, firms can meet customers where they are and empower them to make decisions that help move them toward their goals. A one-size-fits-all approach risks offering support that feels irrelevant or poorly-timed, therefore reducing the likelihood that a customer will engage.

Recognising that customers differ in their readiness to change raises an important question for firms: how can they design gambling harms engagement strategies that consider these differences? To think about this, we can draw on learnings from behaviour change theory.

This guidance aims to help current account providers to consider the different stages a customer may go through in their gambling journey, and how best to support them at each stage. The contents are underpinned by a widely-accepted model of behaviour change and the lived experience of our Research Community of 5,000 people with lived experience of mental health problems.

Although many customers may want to reduce or stop their gambling, there will be significant differences in how ready they are to make that change. This means that the same intervention is unlikely to be equally effective for everyone. By understanding customer readiness to change, firms can ensure that their engagement strategies are designed for maximum effectiveness, supporting customers across a spectrum of readiness to change – from the customer who has only just started considering change to the customer who is ready to take concrete action.

Understanding readiness to change for gambling harms engagement strategies

Fortunately, banks aren't starting from scratch when it comes to understanding behaviour change; many theoretical models of behaviour change exist for them to draw on. One such model is the transtheoretical model, which has been widely used to develop public health interventions and, as such, offers many useful insights that can be applied to the context of gambling.

The transtheoretical model proposes that behaviour change is a dynamic, non-linear process, and that successful interventions must be tailored to an individual's current 'stage of readiness', rather than treating change as a single event.¹² As shown in Figure 2 on the next page, the model consists of five stages of change that individuals move through, often

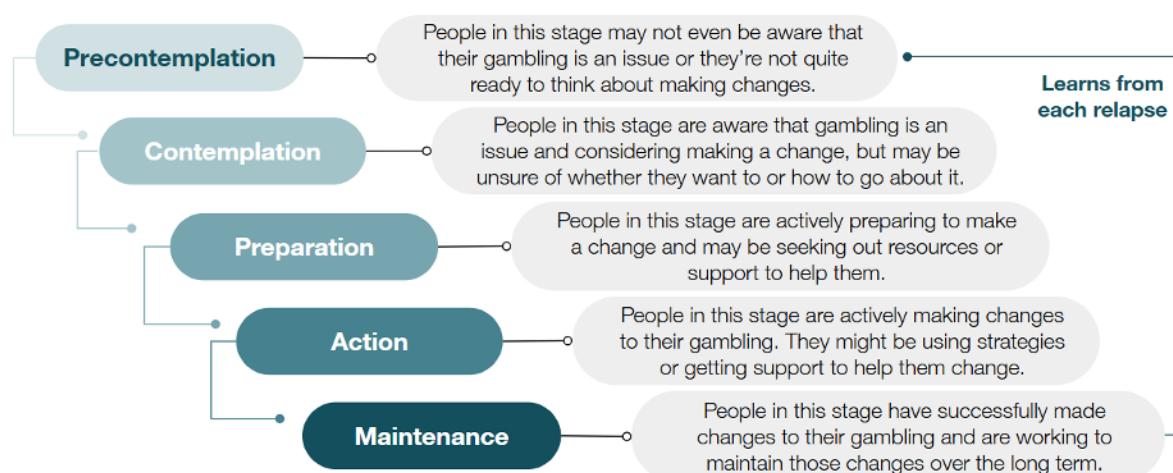
¹² Prochaska J, Velicer W. [The transtheoretical model of health behaviour change](#). American Journal of Health Promotion. 12 (1), 34-48.

cyclically. These are: precontemplation, contemplation, preparation, action, and maintenance. It's possible for individuals to relapse from later stages to earlier ones, or remain in the same stage for a long time without progression.

One of the reasons that this model is so valuable to the context of banks' gambling harms engagement strategies is that it allows us to consider the necessity of these earlier stages – precontemplation, contemplation, and preparation – in an individual's journey to change their gambling behaviour. It is all too easy to associate change only with action, thereby skipping the earlier work necessary for lasting behavioural change.

Rather than seeking to classify customers into these stages, firms can use this model to consider how interventions might land differently depending on an individual's readiness to change. The goal is not to diagnose where a customer is in their journey, but to maximise the effectiveness of gambling support by ensuring different tools, communications, and interventions are available when they are most likely to help.

Figure 2: The transtheoretical model, applied to gambling behaviour change



Source: Money and Mental Health Policy Institute, based on the transtheoretical model of behaviour change and Gambling Help Online's [Stages of Change article](#). [Accessed 01/07/2026]

What people experiencing gambling harms want from their bank

While the theoretical model provides useful insights that firms can apply to their gambling harms engagement strategies, at Money and Mental Health, we aim to ground our research and policy recommendations in lived experience. We surveyed members of our 5,000-person Research Community to understand when and how often offers of support from banks might land best. We surveyed a select group of the Research Community who have direct experience of gambling and gambling harms.¹³ These findings then fed into our recommendations to firms, applying learnings from behaviour change theory.

¹³ This research draws on findings from two surveys. The first was in the field between 11/02/2026 and 23/02/2026, sent to 528 people with lived experience of gambling harm, and received 78 responses. The second was in the field between 08/04/2026 and 20/04/2026, sent to 710 people with lived experience of gambling harm, and received 54 responses. other loans (3%), and payday loans (2%). Percentages do not sum to 100% as respondents could select more than one type of borrowed money.

It is important to note that this group of Research Community respondents may have a greater appetite for intervention due to their lived experiences of gambling and gambling harms; therefore, their insights should not be taken as representative of the general population, but they could inform firms' test-and-learn approaches.

Regular communications provide a steady drumbeat to signal support

Almost two in three (63%) respondents to our survey said that receiving communications monthly or every other month from their bank about gambling would be helpful.¹⁴ Regular communication can create a steady drumbeat with two key effects. Firstly, it can raise customers' consciousness of their gambling and remind them that support is available should they want it. Secondly, it can help to break down the stigma that perpetuates the shame and secrecy around gambling by bringing it out into the open as an issue that many people face.

"It [monthly communications] would be more impactful in making me aware. It would also make it known that the bank is keeping this as a priority and they are seeing the impact it's having on my credit."

Expert by experience

"It needs to be frequent, so if a person is unsure about getting support, they are reminded that support is available."

Expert by experience

Interventions feel most effective when they arrive at a critical moment

Alongside regular communication, respondents also highlighted the importance of structuring interventions around critical moments or decision points. Overall, there was high receptivity for communications that arrive at the point of making a gambling deposit, with two-thirds of respondents (66%) saying this would be helpful.¹⁵ Respondents were also receptive to communications that arrive just after they receive their income, with over half (55%) saying this would be helpful.¹⁶

"I spend £10 a week on gambling... But if I am depressed, it will accelerate quickly and go to £300 a week. If the bank routinely alerts me, I would ignore it. If they could react to a trigger point, it could have more impact."

Expert by experience

¹⁴ Base for this question: 46. Includes responses of 'helpful' or 'very helpful'.

¹⁵ Base for this question: 47. Includes responses of 'helpful' or 'very helpful'.

¹⁶ Base for this question: 47. Includes responses of 'helpful' or 'very helpful'.

Promoting customer autonomy is essential

Respondents had a strong preference for control over whether and how they engage with banks about gambling support. There was a clear preference for communication channels that put the onus on the customer to contact the bank. For example:

- 61% said they would find it helpful to message on a live chat with a real person at the bank¹⁷
- 59% said they would find it helpful to be able to call the bank themselves¹⁸
- 51% said they would find it helpful to have links to external support organisations that they can navigate to themselves.¹⁹

Interventions that enable customers to take action, rather than direct it, are received much more positively.

"It's better for the initiative to come from the customer rather than from the bank."

Expert by experience

Examples of tools that offer customers greater autonomy include spending insights and limits. By giving customers the option to see how much they are spending on gambling and to limit how much they can spend in a given period, banks can enable customers to make more informed choices that allow them to meet their financial goals. More than half (54%) of respondents said they would like to be shown how much they were spending so they could set a limit on their gambling accordingly.²⁰

"... a customised statement specifically outlining exactly how much I had spent on gambling in a given timeframe to outline just how much I was putting in. Maybe even a spreadsheet-style page with my current gambling transactions, and a side-by-side comparison on stuff I could have bought with that money instead (groceries, leisure, savings etc)."

Expert by experience

57% of respondents said they would use a bank spending limit tool.²¹ Respondents felt a spending limit tool would help them see how much they were spending and control their gambling spending.

¹⁷ Base for this question: 47. Includes responses of 'helpful' or 'very helpful'.

¹⁸ Base for this question: 47. Includes responses of 'helpful' or 'very helpful'.

¹⁹ Base for this question: 45. Includes responses of 'helpful' or 'very helpful'.

²⁰ Money and Mental Health survey of 56 people with lived experience of gambling or impacted by someone else's gambling. Base for this question: 24 people.

²¹ Money and Mental Health survey of 79 people with lived experience of gambling or impacted by someone else's gambling. Base for this question: 49 people.

“Some people with mental ill health have very limited impulse control, either all the time or periodically. During these times, we can find it extremely difficult to even recognise what a limit is. Therefore, a pre-agreed hard limit, beyond which no further gambling spending can go, would seem to be a sensible arrangement.”

Expert by experience

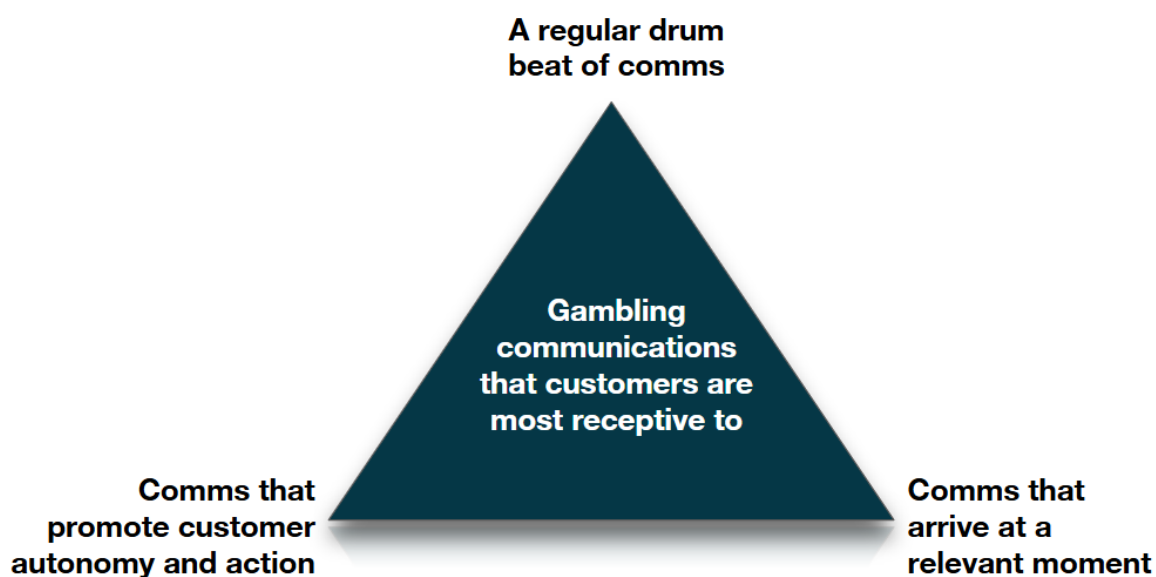
When asked about how they would want their bank to respond if they removed or increased a gambling spending limit, the option with the highest average ranking was ‘provide a cooling off period’.²²

“Provide a ‘cooling off period’ – for example, 72 hours to give me time to think before the spending limit is removed.”

Expert by experience

Taken together, these findings provide three overarching themes that can inform how firms apply behaviour change models to their gambling harms engagement strategies. Figure 3 below shows these themes.

Figure 3: Three interconnected factors that create effective gambling communications



Source: Money and Mental Health Policy Institute.

²² Money and Mental Health survey of 79 people with lived experience of gambling or impacted by someone else's gambling. Base for this question: 21 people.

Designing customer-centred gambling harms engagement strategies

Most engagement strategies for gambling harm prevention tend to use a one-size-fits-all approach, with the same message broadcast to the whole population without consideration of differing levels of readiness to change.²³ Whilst this approach offers simplicity and consistency, it may overlook important differences in how customers respond to gambling-related communications. Customers who are only recently aware of the harms associated with their gambling are likely to require a different approach than those who are actively trying to change their behaviour. As a result, there is likely to be a trade-off between wide-reaching communications and the potential impact of more tailored interventions.

We can draw on the ideas provided by the transtheoretical model, alongside learnings from our lived experience research, to support customers who want to change their gambling behaviour. The objective is not to classify customers based on their gambling behaviour, but to provide progressive support pathways so interventions are appropriately matched to customer actions. In doing so, firms' actions align well with the FCA's Consumer Duty principles to 'support their customers by giving them the information they need, at the right time, and presented in a way they can understand'.²⁴ In Table 1 below, we set out our key considerations and recommendations for firms when designing interventions to support customers at each stage of change.

²³ Gaudett G et al. [Evaluating the Effectiveness of Responsible Gambling Messages: A Rapid Evidence Assessment](#). 2025.

²⁴ Financial Conduct Authority. [A New Consumer Duty](#). 2022

A stage-based support model

Table 1: Key considerations for firms when designing engagement strategies that meet customers at different stages of readiness to change

Stage	What this might look like	Key design objectives for firms	Recommendations
Precontemplation	Customer does not recognise their gambling as harmful. They may engage only under external pressure.	Ensure support is continuously visible and easy to access without requiring customers to actively seek it out.	1) Prominently display links to gambling support resources in frequently visited areas of the website or apps.
Contemplation	Customer recognises there may be a problem and is considering whether to change. They are open to information but remain ambivalent.	Provide neutral, stigma-reducing information about gambling harm and available support to aid informed decision-making.	2) Offer clear information about gambling support tools and external support services without applying pressure to take a specific action.
Preparation	Customer intends to change and is gathering information, but has not yet taken action. They may explore tools or start setup processes, but not complete them.	Reduce friction between intention and action by making tools easy to understand, simple to activate, and reassuring to use.	3) Design user journeys with minimal steps, include default options in the setup of tools to reduce cognitive load and use simple explanations of how tools work. 4) Provide reassurance that settings can be amended later.

Action	Customer has activated a gambling support tool or contacted the bank for help.	Build on customer motivation by offering timely, proactive support and facilitating access to specialist help.	5) Reach out after a BGB or other gambling support tools are activated. 6) Offer digital or in-person warm referrals to specialist services.
Maintenance	Customer continues to use support tools over time and develops confidence in managing their gambling.	Support long-term engagement by providing flexible, friction-based tools that maintain customer autonomy.	7) Allow customers to adjust their gambling controls as their needs change. 8) Ensure continued easy access to support.

We encourage firms to consider all the recommendations in Table 1 when designing their gambling harms engagement strategies, to provide support that meets customers' needs across the full spectrum of readiness to change. In particular, we encourage firms to capitalise on the opportunity to offer personalised support when a customer signals they are ready to take action. By switching on a BGB or disclosing a gambling problem to the bank, a customer shows they are ready to take action and open to support. Firms should seize this opportunity to ensure that the customer has the support they need to sustain this change.

To ensure that support is available to customers across the spectrum of readiness to change, banks should offer a range of tools in addition to a BGB. As a self-exclusion tool, a BGB is most suited to customers who want to abstain from gambling, either permanently or temporarily. The BGB may be useful to customers at different stages of their readiness to change, as a means of taking initial action or as a longer-term maintenance tool, but our surveys with those with lived experience of gambling harms have shown that there is an appetite for tools that help customers to gain greater awareness of their spending and to limit the amount they spend on gambling.

Practical ways to apply these recommendations to gambling support tools

Below are some practical ways to apply these recommendations to gambling support tools like customer spending insights and limits. These are starting points, and we encourage firms to apply the behavioural change model we've laid out in this paper ambitiously and creatively to their gambling harms engagement strategies.

Using gambling operator merchant category codes, banks should offer gambling as a category in their in-app or online customer spending insights

- This would allow customers to clearly see how much they have spent on gambling over a defined period they choose, such as a week or a month.
- Banks could also offer customers choice about what point in the month they see such insights, for example, after payday. They could also let customers choose when they see insights during the day. We would encourage banks to experiment and offer options that work best for their customer base.

Enable customers to pre-set limits on how much they can spend on gambling transactions each week or each month from their account

- For some people, using certain gambling products that are highly addictive by design can lead to gambling spend escalating quickly. This is particularly the case during periods of poor mental health.
- The ability to set limits would give customers an alternative tool to the BGB, which is an abstinence-based tool that blocks all spending to legal gambling operators.
- Banks should consider setting a default monthly spending limit of £30. This offers customers a quick, simple option. Online lab research by the Behavioural Insights Team found that a default amount of £30 per month led to marginally higher rates of participants setting a limit compared to other options such as the ability for customers to choose their own limit amount.²⁵

Build in a 'cooling off' or 'thinking it over' period, for example 72 hours, before customers can remove or access an increased spending limit

- The addictive or impulsive behaviour that can be experienced during periods of using gambling products that are designed to maximise the money and time people spend on them can sometimes mean that people seek to remove or increase spending limits to enable them to spend money that they might not be able to afford.
- A 'cooling off' or 'thinking it over' period before customers can access further funds could give them time to reflect on and consider their spending on gambling.

²⁵ The Behavioural Insights Team [Can spending limits in a banking app support safer gambling?](#) 2023, p.28.

Require customers to make contact with their bank by phone to remove or increase a spending limit rather than in an app or online

- During periods of intense gambling activity, particularly where someone is chasing losses, they may seek to remove or increase a spending limit to gain access to further funds to spend on gambling.
- Adding this extra layer of friction to removing or increasing a spending limit may give customers an opportunity to reflect and avoid financial difficulty.
- This is good practice that is already used by Monzo when a customer who has already spoken to their team about gambling wants to turn off their bank gambling block.²⁶
- Feedback from our Research Community suggests that being required to speak to someone to make changes could strongly deter people from doing so.
- We usually encourage essential services to avoid requiring customers to contact them by phone, in light of our research which finds that many people with mental health problems have serious difficulties using the phone to carry out essential admin.²⁷ But in the case of adding necessary friction for a customer who is struggling with their gambling, we see this as an appropriate recommendation.

Banks who introduce insights and limit tools should actively promote their availability to their customers

- Customers may not always be aware of new tools their banks introduce, as they may not specifically search for these features on their websites or in their apps. Customers also may not come across them naturally as part of their day-to-day banking.
- Actively promoting gambling spend insights and limits tools will help banks increase customers' awareness of and use of these features.
- Banks could use universal marketing campaigns or targeted messages based on transaction data analysis,²⁸ to identify which of their customers are most at risk of experiencing gambling harms, to promote greater awareness of the gambling insights and limits tools that they introduce.

²⁶ Monzo. Managing your gambling spend. <https://monzo.com/gambling-block>. Accessed [30/09/2026]

²⁷ Holkar M, Evans K, Langston K. Access Essentials. 2018.

²⁸ Clifton L, Bond N. [First line of defence](#). Money and Mental Health Policy Institute. 2025.

Conclusion

Current account providers have an important role to play in supporting customers who are at risk of or experiencing gambling harms, but the impact of their interventions depends on delivering the right support at the right time. Firms can move beyond a one-size-fits-all approach and consider how different approaches may be more effective depending on how ready and motivated a customer is to change.

Drawing on behaviour change theory and lived experience research, this guidance offers firms initial recommendations for designing interventions that support customers at different stages of readiness to change. We encourage firms to adopt a test-and-learn approach, evaluating and refining interventions over time and sharing learning across the sector to grow the evidence base for reducing gambling harms.

Appendix: The Gambling Harms Action Lab

The Money and Mental Health [Gambling Harms Action Lab](#) (GHAL) is a three-year programme that began in May 2024 and works directly with seven current account providers to explore how firms can best support customers at risk of or experiencing gambling harm. The firms taking part are: Barclays, First Direct, HSBC, Monzo, Nationwide, Starling and Virgin Money.

As part of the GHAL programme, the seven providers took part in an 18-month Action Learning Set series to explore common challenges banks face in supporting their customers experiencing gambling harms. The seven firms also committed to test and pilot at least one new or improved tool, process, or communication to support customers at risk of, or experiencing, gambling harms.

The programme is driven by insights from research with members of the Money and Mental Health Research Community. The Research Community is made up of people with personal experience of mental health problems, or of supporting someone who does. The GHAL carried out research with Research Community members who opted to take part in research as someone who has gambled and experienced gambling harms or as someone who has been impacted by someone else's gambling.

The GHAL has produced a series of reports to share the insights and findings from the programme, including:

- [Shining a light](#) – Exploring the role of financial services in tackling gambling harms
- [First line of defence](#) – How banks can use transaction data to support customers at risk of or experiencing gambling harm
- [Gambling in the red](#) – How banks can introduce safeguards to tackle harm from gambling in overdrafts.

