



MONEY AND  
MENTAL HEALTH  
POLICY INSTITUTE



# A SAFER BET?

---

Online gambling and mental health

Merlyn Holkar and Chris Lees

# Contents

<b>Executive summary</b>	<b>5</b>
<b>Introduction</b>	<b>8</b>
Our work on online harms	8
Online gambling	8
This report	9
<b>Section one: Gambling-related harm</b>	<b>11</b>
1.1 Summary	14
<b>Section two: Drivers of harm for people with mental health problems</b>	<b>16</b>
2.1 The reasons why we gamble	16
2.2 Our ability to stay in control	18
2.3 Our ability to cut down	20
<b>Section three: Solutions</b>	<b>24</b>
3.1 The role of online gambling operators	24
3.2 The role of financial services providers	28
3.3 The role of online advertising platforms	29
3.4 The role of internet service providers	29
3.5 The future of online gambling regulation	32
3.6 Conclusion and next steps	35

## Publication

The Money and Mental Health Policy Institute,  
July 2020

22 Kingsway, London, WC2B 6LE

© Money and Mental Health Policy Institute, 2020

The moral right of the authors has been asserted.  
All rights reserved. Without limiting the rights under  
copyright reserved above, no part of this publication  
may be reproduced, stored or introduced in a retrieval  
system, or transmitted, in any form or by any means  
(electronic, mechanical, photocopying, recording or  
otherwise), without the prior written permission of both  
the copyright owner and the publisher of this report.

This report represents the research and views solely  
of the authors and of the Money and Mental Health  
Policy Institute.

## Acknowledgements

The Money and Mental Health Team would like to  
express our gratitude and admiration to all those  
members of our Research Community who gave up  
their time and shared their experiences.

A special thanks to the rest of the team at Money  
and Mental Health, in particular to Conor D'Arcy for  
editorial support.

## About the authors

Merlyn Holkar is a Senior Research Officer at  
Money and Mental Health. Merlyn holds a BA  
in Philosophy, Politics and Economics from the  
University of Warwick. Before joining Money and  
Mental Health, Merlyn worked in the Policy and  
Campaigns department at Contact a Family.

Chris Lees is a Research Officer at Money and  
Mental Health. Chris joined Money and Mental  
Health from Survation, where he was lead project  
manager. Prior to this, he worked at the think  
tank British Future and was involved in a range of  
projects including the National Conversation. Chris  
holds an MA and BA from the University of York.



## Executive summary

### Online harms

- For people with mental health problems, the internet can be invaluable, from making essential services more accessible to helping us stay in touch with friends and family.
- But the interaction between common symptoms of mental health problems and the nature of many online spaces – always available, less regulated, frictionless and designed to make money – can lead to financial difficulties.
- This paper is the first in a series exploring a range of these harms and their financial impact on people with mental health problems, with the aim of creating a safer online environment for everyone.

### Online gambling

Online gambling is an enjoyable activity for many of us. But there is a risk of harm for every customer, rising to extreme levels for some of us, some of the time. Struggling to stay in control of online gambling can have a devastating impact on our finances, our mental health and our relationships. We explored these issues with 238 members of our Research Community, a group of people with lived experience of mental health problems.

- A quarter (24%) of respondents have experienced financial problems as a result of gambling online, and one in three (32%) have bet more than they could afford to lose.
- Over a third (36%) have become stressed or anxious because of gambling online and the same proportion have felt guilty about the way they gamble.

### The reasons we gamble

- Mental health problems can drive us to gamble online, including as a form of escape or self-harm, or to try and solve financial problems.
- Common symptoms of mental health problems can also make it hard to resist gambling adverts when unwell. More than eight in ten (85%) Research Community members felt it was impossible to avoid seeing online gambling adverts, and many felt overwhelmed by advertising.

### Our ability to stay in control

- The design of online gambling environments, including the ease of making a deposit and nudges in game design, can be a toxic combination with common symptoms of mental health problems, such as increased impulsivity and reduced problem-solving ability.
- Based on national polling conducted for this report, four in ten (40%) online gamblers who have experienced mental health problems say that it doesn't feel like they're spending real money when they gamble online, and one in three (32%) feel that it is not easy to stay in control of online gambling.

### Our ability to cut down

- Cutting down on online gambling is often a practically and emotionally difficult journey for people with mental health problems. Among Research Community respondents, seven in ten (71%) of those who had tried to cut down did not find it easy to do.
- People with mental health problems can find it difficult to seek help early which means problem behaviours become entrenched. Respondents also told us support tools to help manage gambling are of limited use.

We have worked closely with our Research Community to consider the role that different actors could play in reducing gambling-related harm. We find broad support for making the online gambling environment safer by default and more responsive to emerging problems, starting with gambling operators but including services that promote or enable gambling, including advertisers, internet service providers and current account providers. Each level provides an opportunity to build in friction to reduce harms related to online gambling as well as support for those who are struggling.

**Online gambling operators should:**

- Set limits for all customers, to ensure safety by default
- Use customer account data to identify signs of vulnerability and offer proactive support
- Suspend advertising and marketing for as long as social distancing measures are in place.

**Online advertising platforms should:**

- Create a simple gambling advert self-exclusion tool, to empower users with mental health problems to improve their experience of online spaces and protect themselves from harm.

**Internet service providers should:**

- Offer a tool that blocks access to gambling websites, with separate branding from broader filters aimed at protecting children.

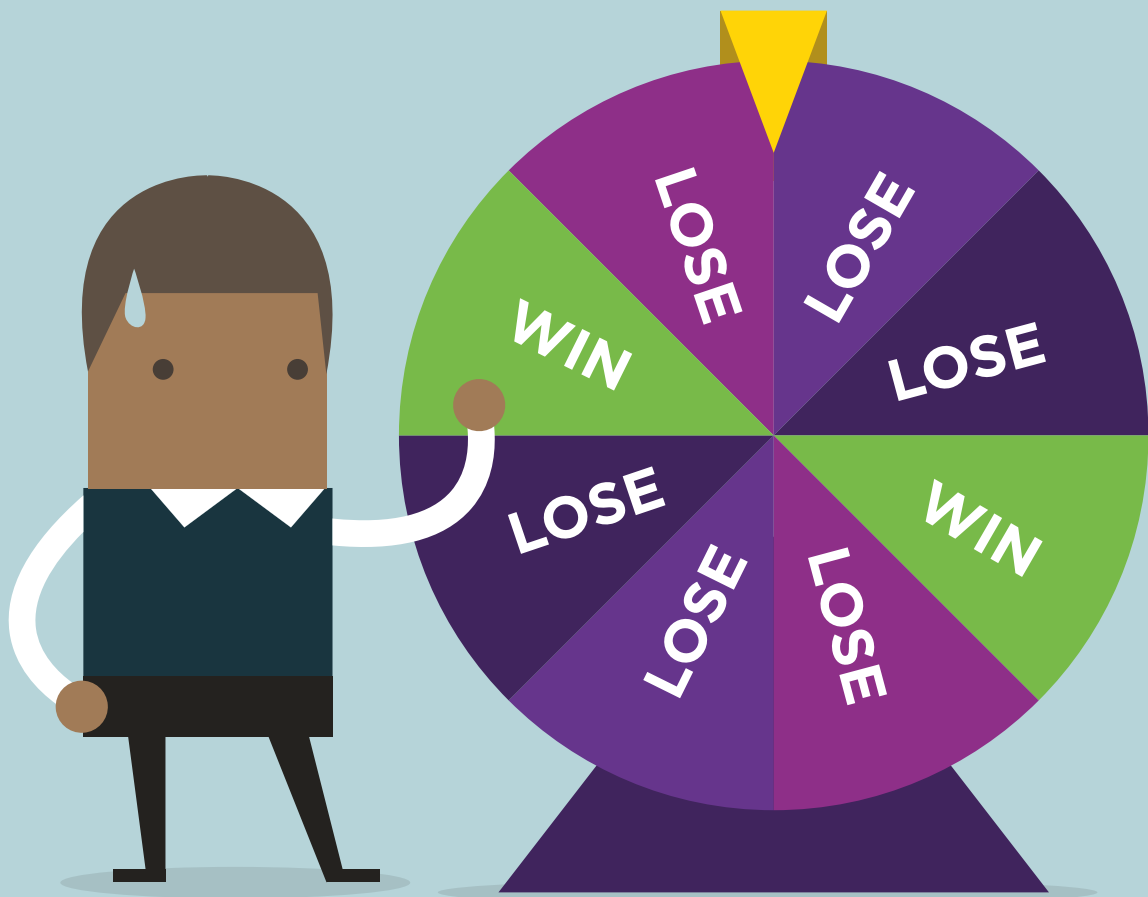
**Financial services providers should:**

- Offer proactive support if customers spend more than usual on gambling
- Provide effective controls, including a gambling transaction block with a cooling-off period
- Set limits on deposits into online gambling accounts by default.

Action from the kinds of organisations listed above would mitigate some of the risks facing people with mental health problems when they gamble online. But given the prevalence and severity of these harms, the government should act, using its review of the Gambling Act and working with the Gambling Commission to introduce firmer regulation, with harsher penalties for online gambling operators who do not comply.

**Future online gambling regulation should:**

- Ensure player safety by setting safe default limits across online gambling markets
- Place more responsibility on operators to intervene early and report on customer outcomes
- Ensure control settings are easy to find, simple to set up, and provide an appropriate level of 'friction'
- Consider targeted interventions to game design where there is evidence of particular harm
- Assess the role of advertising and marketing in driving harm and respond accordingly.



# Introduction

## Our work on online harms

The internet is a lifeline for many people with mental health problems. It can offer support networks and services, distraction and entertainment, even when people are unwell or unable to leave the house. However, online spaces can expose people to risks that are not present offline, or are more acute when people access services in this way. Unlike their 'real world' counterparts, they are available night and day, are often less regulated and transactions are usually quicker and easier. These characteristics can combine with common symptoms of mental health problems, leaving many of us exposed to significant but underexplored financial risks.

This paper is the first in a series of Money and Mental Health publications looking at online harms experienced by people with mental health problems. Our work will focus on financial harms, a form of online harm that has not yet received sufficient attention, but will grow in importance as people spend more time online and are increasingly expected to access services in this way.

Online harms predate coronavirus, but the crisis adds urgency. Lockdown has likely accelerated the shift towards digital channels, forcing some people to access services online for the first time. Broadband providers report up to 60% increases in traffic since lockdown began.<sup>1</sup> The crisis also looks likely to have a lasting impact on the nation's mental and financial health.<sup>2</sup> Many of us are now more reliant on the internet, yet more vulnerable to harm when using it.

## Online gambling

Gambling is an enjoyable activity for many of us. But there is a risk of harm for every customer, rising to extreme levels for some of us, some of the time. At its worst, problem gambling can be detrimental to our financial and mental health, and to those around us. British gambling operators took £5.3bn from online gambling in 2019, up from £1bn in 2009.<sup>3</sup>

"Gambling has destroyed my life, financially and mentally."

*Expert by experience*

People with mental health problems are particularly vulnerable to harm. Our mental health can affect the reasons why we gamble, whether we stay in control, and our ability to cut down. Common symptoms of mental health problems, like increased impulsivity and trouble thinking clearly, can make decision-making more difficult or lead people to see gambling as a solution to their challenges.

The design of the online gambling environment can exacerbate these problems. Online gambling is only ever a click or a swipe away, even when we're at our lowest, struggling to sleep at night or so unwell that we can't get out of bed. It is now widely recognised that UK gambling regulation and consumer protections have not kept pace with innovation and growth in the industry, and the government has committed to review the Gambling Act.<sup>4</sup>

1. Ofcom. Broadband networks stand firm during pandemic. 2020. <https://www.ofcom.org.uk/about-ofcom/latest/features-and-news/broadband-networks-stand-firm-during-pandemic>. Accessed June 2020.

2. Banks J and Xu X. The mental health effects of the first two months of lockdown and social distancing during the Covid-19 pandemic in the UK. Institute for Fiscal Studies. 2020; and Bangham G and Leslie J. Rainy days: An audit of household wealth and the initial effects of the coronavirus crisis on saving and spending in Great Britain. Resolution Foundation. 2020.

3. National Audit Office. Gambling regulation: problem gambling and protecting vulnerable people. 2020.

4. Get Brexit Done Unleash Britain's Potential. The Conservative and Unionist Party Manifesto 2019. 2019; and National Audit Office. Gambling regulation: problem gambling and protecting vulnerable people. 2020.



This provides an opportunity to address harm currently experienced by people with mental health problems and improve player safety for all.

This paper explores people with mental health problems' experiences and views on consumer protection measures, drawing on:

- A nationally representative poll of 2,096 people, conducted 7-10 May and carried out by Populus. Our analysis focuses on the 30% of the population who gamble online, comparing the views and experience of those in this group who have experienced mental health problems (35%) and those who have not (59%)<sup>5</sup>
- Two surveys and a focus group carried out during April-June 2020 with members of the Money and Mental Health Research Community, a group of nearly 5,000 people with lived experience of mental health problems, who are at the heart of everything we do. One survey covered 255 participants' experience of online harms, and the other covered 238 participants' experiences of and views about online gambling.

### This report

- **Section one** explores the harm that people with mental health problems can experience when gambling online.
- **Section two** sets out key drivers of gambling-related harm for people with mental health problems.
- **Section three** explores people with mental health problems' views on how to reduce gambling-related harm, and sets out steps to make the online gambling environment safer by default and more responsive to harm.

5. Money and Mental Health analysis of Populus online survey of 2,096 people, carried out 7-10 May 2020. Data is weighted to be nationally representative.

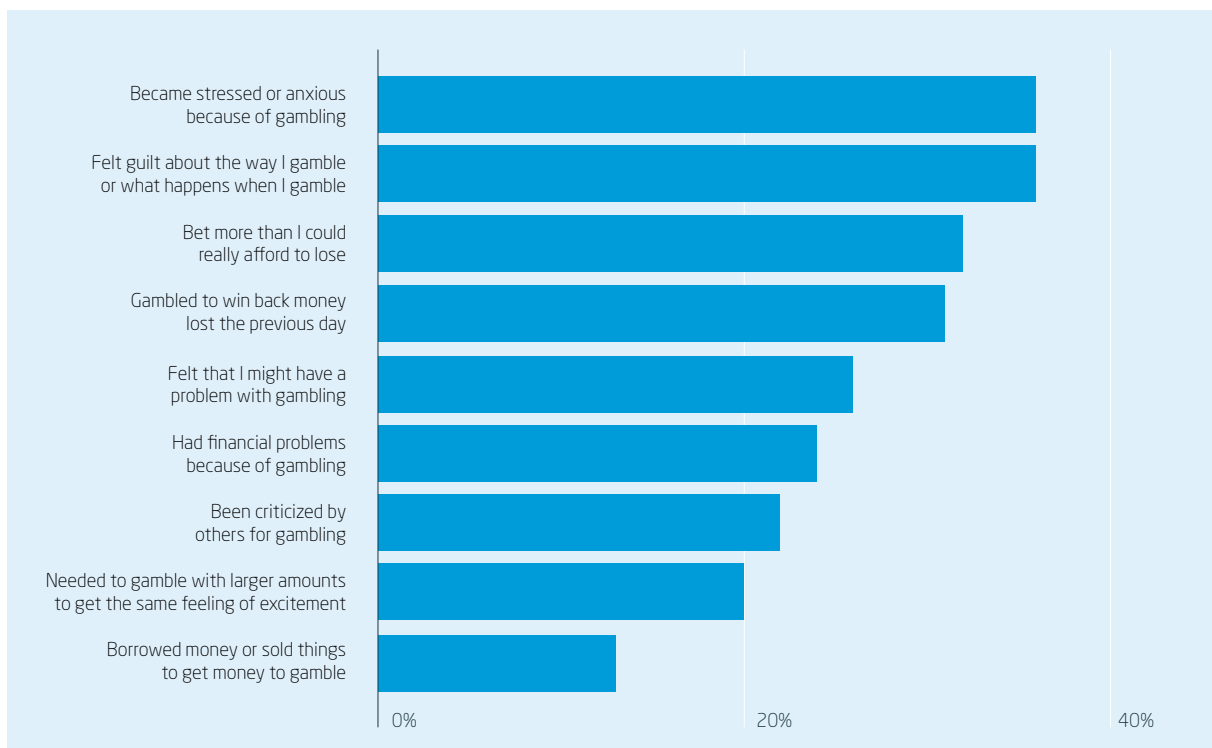


## Section one: Gambling related harm

Gambling online can be an enjoyable activity. But when we struggle to stay in control it can have a detrimental impact on our financial and mental health, and affect those around us. The extent of that detriment can vary. Approximately 1% of the population are considered 'problem gamblers' – those experiencing significant harm as a result of gambling – with a further 4% at risk.<sup>6</sup> Data from 2016 found that rates are higher among online gamblers, with 4% considered problem gamblers and one in four (24%) considered at risk.<sup>7</sup>

But beyond those meeting these definitions, our research suggests that a much broader group experiences some online gambling-related harm, some of the time. Almost half of Research Community respondents we surveyed (45%) had experienced at least one indicator of problem gambling while gambling online, such as it causing financial problems, guilt or anxiety.<sup>8</sup>

**Figure 1: Percentage of Research Community respondents who have experienced indicators of problem gambling while gambling online**



Source: Money and Mental Health Survey of 238 people with lived experience of mental health problems. Base varies by row, between 128 and 135 people who have gambled online.

6. Gambling Commission. Gambling participation in 2019: behaviour, awareness and attitudes. 2020.

7. Conolly A et al. Gambling behaviour in Great Britain in 2016. NatCen Social Research. 2018.

8. Money and Mental Health Survey. Base for this figure: 113 people with lived experience of mental health problems who have gambled online and gave a valid answer, either 'Yes' or 'No', for every indicator of problem gambling. Bases for individual indicators will be larger as a result.

“I have to watch myself [so] that I do not spend more than I can afford as it is easy to get carried away.”

*Expert by experience*

Given how widespread these negative experiences of online gambling are, and their connections with mental health, in this paper we consider the risks facing anyone who gambles online and has a mental health problem.

### Financial harm

One of the key harms that can come as a result of struggling to stay in control of online gambling is the impact it can have on our finances.

“[Online gambling] has ruined me financially and in the past, I maxed out credit cards and payday loans to fund this habit.”

*Expert by experience*

As Figure 1 shows, one in four (24%) Research Community respondents have experienced financial problems as a result of gambling online, and one in three (32%) have bet more than they could afford to lose.<sup>9</sup> Nine in ten (92%) of our Research Community respondents agreed that it is too easy to spend lots of money gambling online.<sup>10</sup>

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

*Expert by experience*

People with a mental health problem are more likely to be financially insecure,<sup>11</sup> which means the financial impact from gambling related harms can be severe.

### Impact on our mental health

Difficulties staying in control of online gambling can impact on our mental health, sometimes with devastating results. More than one in three (36%) Research Community respondents have become stressed or anxious because of gambling online and the same proportion have felt guilty about the way they gamble.<sup>12</sup>

“Gambling online makes my stress levels and anxiety worse. Even when I win it doesn't really make me happy but I can't stop the urge to play.”

*Expert by experience*

Analysis of the Adult Psychiatric Morbidity Survey shows that problem gamblers are almost eight times more likely to attempt to take their own life than people who show no signs of problem gambling.<sup>13</sup> Some Research Community respondents directly attributed suicidality to problems with online gambling.

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

*Expert by experience*

9. Money and Mental Health Survey. Bases for these questions respectively: 134 and 135 people with lived experience of mental health problems who have gambled online.

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

11. Bond N and D'Arcy C. Income in Crisis. Money and Mental Health Policy Institute. 2020.

12. Money and Mental Health Survey. Base for these questions: 131 people with lived experience of mental health problems who have gambled online.

13. Wardle H et al. Problem gambling and suicidal thoughts, suicide attempts and non-suicidal self-harm in England. GambleAware. 2019.

### Impact on relationships

When we struggle to keep in control of online gambling, it can harm our relationships. An estimated 7% of people in Britain have been negatively affected by someone else's gambling, with the most common negative impact being on relationships.<sup>14</sup> The stigma around problem gambling can often lead to people hiding it from their loved ones, which can be facilitated when remotely gambling online through mobile devices.

"It's easier to hide online and not be physically seen to be losing money."

*Expert by experience*

"My mental health is low now. Lockdown has made it worse. I know I should not be wasting money playing online bingo but the excitement of possibly winning keeps tempting me. Because I am depressed I feel I need some excitement in my life."

*Expert by experience*

The pause in sports during lockdown could explain why many (50%) had reduced their online gambling,<sup>17</sup> which could be reversed by its resumption.

"I've used the lockdown to try and withdraw as [there was] no sport to bet on. However this last week I've been drawn back in as games have restarted."

*Expert by experience*

### The impact of coronavirus on gambling related harm

The harms identified above predate the coronavirus pandemic. But the crisis looks likely to have a lasting impact on the nation's mental and financial health. Despite unprecedented disruption and uncertainty, our national polling found that almost half (47%) of online gamblers were gambling at least as much as usual at the start of May, with one in ten (11%) gambling more than usual.<sup>15</sup> This rate was higher among Money and Mental Health's Research Community respondents,<sup>16</sup> and some respondents directly attributed an increase in gambling to challenging circumstances during the pandemic.

14. Dinios S et al. Treatment Needs and Gap Analysis in Great Britain. NatCen Social Research. 2020.

15. Money and Mental Health analysis of Populus online survey of 2,096 people, carried out 7-10 May 2020. Data is weighted to be nationally representative.

16. 26% were gambling more than usual and 38% about the same as usual. Money and Mental Health Survey. Base for this question: 50 people with lived experience of mental health problems who have gambled online.

17. Money and Mental Health analysis of Populus online survey of 2,096 people, carried out 7-10 May 2020. Data is weighted to be nationally representative.

### Section one summary

- Struggling to stay in control of online gambling can have a devastating impact on our finances, our mental health and our relationships.
- A quarter (24%) of Research Community respondents have experienced financial problems as a result of gambling online, and one in three (32%) have bet more than they could afford to lose.
- Over a third (36%) of Research Community respondents have become stressed or anxious because of gambling online and the same proportion have felt guilty about the way they gamble.



## Section two: Drivers of harm for people with mental health problems

Given the harm that online gambling can cause for some, it is important to understand its drivers. In this section, we explore how common symptoms of mental health problems can affect the reasons why we gamble, our ability to stay in control and our ability to cut down. We also highlight how the design of the online gambling environment can compound these problems.

### 2.1 The reasons why we gamble

Many of our Research Community respondents told us that symptoms of their mental health problems had led to them gambling for the wrong reasons. The online gambling environment, through its constant availability and the prevalence of advertising, was often cited as enabling this behaviour. Based on what we heard from our Research Community members, we have grouped these drivers into three broad areas.

#### Gambling as an escape

Many Research Community respondents described gambling online as a way to try and escape poor mental health, as a short-term means of lifting their mood.

"Gives you [a] buzz, excitement when you're feeling down and depressed."

*Expert by experience*

Online gambling environments are designed to be exciting and immersive, which can be particularly appealing during periods of poor mental health, when people are often unable to leave their homes to access this feeling in other ways.

"Winning would be the only way out when I couldn't get out of bed."

*Expert by experience*

#### Gambling as a form of self-harm

Mental health problems can drive feelings of hopelessness and self-destructive behaviours.<sup>18</sup> Some people with mental health problems describe gambling online as a form of self-harm, seeking financial losses to confirm negative feelings about themselves. The constant availability of online gambling means that it is there when people are at their lowest, and the lack of limits in online gambling environments offers a large scope for harm.

"I gamble for the pain of losing as it reinforces my thoughts about myself... I do it to hurt myself."

*Expert by experience*

"My behaviour is not just about gambling, it's a form of self abuse."

*Expert by experience*

18. Bond N and Fitch C. The need to know: Understanding and evidencing customers' mental health problems. Money and Mental Health Policy Institute and Money Advice Trust. 2020.



## Gambling to solve financial problems

People with a mental health problem are more likely to be in problem debt,<sup>19</sup> and some respondents described seeing online gambling as a way to solve financial problems.

“[Mental health problems] made me not care, made me think I can win all my money that I need to get out of debt.”

*Expert by experience*

Common symptoms of mental health problems, such as increased impulsivity and difficulty thinking clearly, can make it harder for people to weigh up decisions and lead to an unrealistic view of what gambling can offer.<sup>20</sup> This can be particularly problematic when the design of online gambling environments encourages continued play, downplays losses and minimises friction when placing deposits and bets.<sup>21</sup>

“Gambling is like believing in a fairy tale. That something will come along one [day] to make everything better and take all your troubles away.”

*Expert by experience*

## The pull of online advertising and marketing

Adverts, particularly those that contain specific offers such as free bets for registering an account, have been found to lead to increased bets,<sup>22</sup> as well as longer and riskier forms of gambling.<sup>23</sup> As we are increasingly exposed to adverts for online gambling,<sup>24</sup> people with a mental health problem report feeling overwhelmed by this. Three-quarters (73%) of Research Community respondents said they always or often see a gambling advert when they go online,<sup>25</sup> and 85% felt it was impossible to avoid seeing online gambling adverts.<sup>26</sup>

“The online adverts are horrendous, there feels like there is no escape at times.”

*Expert by experience*

Common symptoms of mental health problems, particularly increased impulsivity, can make it hard to resist online gambling adverts when unwell, and the journey from advert to bet is often quick and easy.

“I find it really hard to resist the pop up adverts for gambling online. It's really tempting to click and have a go.”

*Expert by experience*

19. Holkar M. Debt and mental health: A statistical update. Money and Mental Health Policy Institute. 2019.

20. Holkar M. Seeing through the fog. Money and Mental Health Policy Institute. 2017.

21. Gambling Related Harm All Party Parliamentary Group. Online Gambling Harm Inquiry Final Report. 2020; and The Behavioural Insights Team. Can behavioural insights be used to reduce risky play in online environments? 2018.

22. Gambling Commission. Gambling participation in 2019: behaviour, awareness and attitudes. 2020; and Hing, N et al. Do advertising and promotions for online gambling increase gambling consumption?. An exploratory study. International Gambling Studies 2014; 14, 3; 394-409.

23. The Behavioural Insights Team. Can behavioural insights be used to reduce risky play in online environments? 2018.

24. GambleAware. Spend on gambling marketing. 2018; and Gambling Related Harm All Party Parliamentary Group. Online Gambling Harm Inquiry Final Report. 2020.

25. Money and Mental Health Survey. Base for this question: 130 people with lived experience of mental health problems who have gambled online.

26. Money and Mental Health Survey. Base for this question: 129 people with lived experience of mental health problems who have gambled online.

## 2.2 Our ability to stay in control

Based on our national polling, one in three (32%) online gamblers who have experienced a mental health problem feel it is not easy to stay in control of online gambling.<sup>27</sup> Among gamblers with no experience of mental health problems, a quarter (23%) felt the same.<sup>28</sup> This both highlights the increased risk of harm for people with a mental health problem, and that everyone could benefit from measures to help online gamblers stay in control.

Our Research Community respondents shone more light on this gap, with half (53%) having gambled online during a period of poor mental health,<sup>29</sup> and 85% agreeing that it is harder to stay in control of gambling when unwell.<sup>30</sup>

### Ease of spending

Almost all (94%) Research Community respondents agree that it is too easy to gamble at any time of day or night.<sup>31</sup> Online gambling is available at all hours and is easy to engage with, even when people are acutely unwell. This ease is particularly problematic for people experiencing increased impulsivity, which is a common symptom of several mental health problems.

"I gamble online because it is easy and I don't have to go anywhere."

*Expert by experience*

Several respondents highlighted the ease of making deposits, including while playing a game, as making it harder to stay in control of gambling.

"It's easy peasy making a deposit which you can do mid-game if you run out."

*Expert by experience*

Conversely, some respondents felt that online gambling operators deliberately make it difficult to withdraw funds, with convoluted journeys and repeated prompts asking people to confirm that they want to withdraw. This can lead to people with mental health problems playing on instead.

### Game design

Games online are often designed to be exciting and to keep people playing. Eight in ten (82%) Research Community respondents agreed that online gambling is more addictive than offline gambling.<sup>32</sup>

Players are nudged through time pressures and offers mid-game, while 'near misses' and bonuses can encourage those who have just lost money to spend more.<sup>33</sup> These features can make it difficult for people with a mental health problem to stay in control.

27. Money and Mental Health analysis of Populus online survey of 2,096 people, carried out 7-10 May 2020. Data is weighted to be nationally representative.

28. Money and Mental Health analysis of Populus online survey of 2,096 people, carried out 7-10 May 2020. Data is weighted to be nationally representative.

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

30. Money and Mental Health Survey. Base for this question: 121 people with lived experience of mental health problems who have gambled online.

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

32. Money and Mental Health Survey. Base for this question: 119 people with lived experience of mental health problems who have gambled online.

33. Gambling Related Harm All Party Parliamentary Group. Online Gambling Harm Inquiry Final Report. 2020; and The Behavioural Insights Team. Can behavioural insights be used to reduce risky play in online environments? 2018.

“The site is colourful and often times mesmerising (especially the slots). There are offers to try other games for free, which is in their interest because that might just be your game of addiction.”

*Expert by experience*

Certain types of offline gambling such as slot games or fixed odds betting terminals have stake limits; but online, players are able to place larger bets, without stake limits, on faster paced versions of the same game.<sup>34</sup>

“£500 [per] spin on roulette is a good example as you can bet up to £250k if you wanted to, every 30 seconds or less.”

*Expert by experience*

The prizes on offer can often draw in those of us with mental health problems, as our ability to process and weigh up information can be inhibited, making it difficult to assess the associated risks.

“You fantasize about how all your problems would magically be fixed if you win.”

*Expert by experience*

### Doesn't feel like real money

The design of online gambling can contribute to a feeling that players aren't gambling with real money, which can lead to people spending more than they can afford.<sup>35</sup> This appears to particularly affect those with a mental health problem. In our national polling, 40% of online gamblers who have experienced a mental health problem agreed that it doesn't feel like they're spending real money when they gamble online, compared to a still significant one in four (26%) of those who have never experienced a mental health problem.<sup>36</sup>

Many Research Community respondents also highlighted this issue; some described gambling online as feeling more like spending “monopoly money”, and reported that spending can feel less tangible during periods of poor mental health.

“It's too easy to lose your money, because you're only pressing [a] button, you don't actually have the cash in your hand.”

*Expert by experience*

“I don't feel like I am in real life somehow. I am just addicted to winning or just playing.”

*Expert by experience*

The combination of the ease of spending, game design, and losses not feeling like real money can make it difficult for those with a mental health problem to stay in control and avoid harms.

34. Gambling Related Harm All Party Parliamentary Group. Online Gambling Harm Inquiry Final Report. 2020

35. The Behavioural Insights Team. Can behavioural insights be used to reduce risky play in online environments? 2018; and Gambling Related Harm All Party Parliamentary Group. Online Gambling Harm Inquiry Final Report. 2020.

36. Money and Mental Health analysis of Populus online survey of 2,096 people, carried out 7-10 May 2020. Data is weighted to be nationally representative.

## 2.3 Our ability to cut down

People experiencing gambling-related harms may try to reduce their online gambling. But mental health problems can make it harder, meaning trying to cut down can be a difficult journey, practically and emotionally. Among Research Community respondents who had tried to cut down, just 6% agreed this was easy, while 71% disagreed.<sup>37</sup>

Symptoms of common mental health problems can mean people struggle to seek help promptly and find it difficult to keep on track. When people do seek help, the available support tools can have limitations and are deemed inadequate by some people with mental health problems.

"I am very lucky that I have managed to get to a good place now but it's not been long and it's been a really hard road."

*Expert by experience*

When attempts to cut down on online gambling fail, this can compound feelings of guilt and shame, and have disastrous consequences for people's mental and financial health.

"I've tried to stop gambling many times and each time I've screwed it up when I have an episode [of poor mental health] either high or low. It drives me mad that the access is so easy."

*Expert by experience*

### Difficulty seeking help

People with a mental health problem may be particularly slow to seek help, even after recognising they have a problem. Avoidance is a common coping mechanism, particularly for those experiencing anxiety, and behaviours can become more entrenched and harder to address if people delay action.

"This slogan of "When the fun stops, stop" is ridiculous ... No one is going to recognise that it's time to stop until it's too late."

*Expert by experience*

Some respondents described feeling dependent on online gambling and being scared to take the first step to cut down.

"My mental health is worse when trying to cut down."

*Expert by experience*

Earlier intervention can therefore be beneficial. But low motivation, a hallmark symptom of depression, can impact our ability to take the first steps. For many people with mental health problems, the significant stigma associated with gambling problems can exacerbate these difficulties, leaving people feeling isolated and further delaying seeking help.

<sup>37</sup>. Money and Mental Health Survey. Base for this question: 49 people with lived experience of mental health problems who have tried to cut down on the amount of money they spend gambling online.

### Limitations of available tools

While online gambling companies provide a variety of tools for people who want to cut down, from spending limits to self exclusions, take-up and awareness is low. The Gambling Commission found that more than half (53%) of gamblers are unaware of self-exclusion and four in ten (42%) haven't heard of financial limits.<sup>38</sup>

Research Community respondents that had used tools described various drawbacks. Several felt that 24-hour 'cooling-off' periods when changing deposit limits were too short, enabling customers to raise limits and bet again in a relatively short amount of time. Others felt that any controls at the operator level are ineffective, as there are so many alternative ways to gamble online; more than half (56%) of online gamblers have multiple accounts.<sup>39</sup>

"Spending limits only work so far, as there are hundreds of ways to bet with different companies."

*Expert by experience*

"It only takes 24 hours to increase the limits, so you can request the increase and move to another site then go back again."

*Expert by experience*

Several respondents reported that multi-operator self-exclusion had been effective for them, but that they had experienced significant harm before triggering this option.

Many Research Community respondents felt powerless to protect themselves from online gambling adverts, both online and offline, and some described the negative impact this had on their attempts to cut down on online gambling. Few described using tools to limit exposure to ads.

"Facebook adverts cannot be turned off for gambling, only reported as spam, so even after you've tried quitting you still get bombarded with them."

*Expert by experience*

<sup>38</sup>. Gambling Commission. Gambling participation in 2019: behaviour, awareness and attitudes. 2020.

<sup>39</sup>. Ibid

## Section two summary

Mental health problems can impact:

### The reasons why we gamble

- Mental health problems can drive us to gamble online, including as a form of escape, to self-harm or to try and solve financial problems.
- It can be difficult to resist gambling adverts while unwell. 85% of Research Community respondents felt it was impossible to avoid seeing online gambling adverts.

### Our ability to stay in control

- The design of online gambling environments can combine with common symptoms of mental health problems to make it difficult to stay in control.
- Nationally, four in ten (40%) online gamblers who have experienced mental health problems say that it doesn't feel like they're spending real money when they gamble online, and one in three (32%) feel that it is not easy to stay in control of online gambling.

### Our ability to cut down

- Cutting down on online gambling can be a difficult journey for people with mental health problems. Just 6% of Research Community respondents who had tried to cut down found this easy, while 71% disagreed that it was easy.
- It can be difficult for people with a mental health problem to seek help early, and support tools to help manage gambling can often be limited.



## Section three: Solutions

Our work with our Research Community respondents revealed broad support for steps to make the online gambling environment safer by default and more responsive to emerging problems. A considerable number of respondents favoured going further and banning online gambling outright, as it can cause such severe harm. While recognising this view, in this section we focus on practical changes that would prevent or reduce harm related to online gambling for people with mental health problems.

The changes we recommend would affect all those who gamble online. Universal adjustments to the online gambling environment are required to effectively reduce harm for people with mental health problems. Mental health problems are both common – one in four of us will experience a mental health problem each year<sup>40</sup> – and underdiagnosed – more than one third (36%) of people experiencing a common mental disorder have never received a diagnosis.<sup>41</sup> Therefore, effective protection cannot rely on people with mental health problems disclosing their condition to an online gambling operator.

Our Research Community respondents identified opportunities for a range of actors to protect gamblers, starting with online gambling operators themselves, but also including financial services providers and online advertising platforms. Action from such firms would mean online gamblers are better protected, but relying solely on voluntary steps is likely to be insufficient, given the severity of harm experienced by some people with mental health problems who gamble online. To that end, we have also set out recommendations for the government as part of its reform of the Gambling Act and modernisation of online gambling regulation, including the role of the Gambling Commission and the Advertising Standards Authority.

### 3.1 The role of online gambling operators

We welcome recent steps that the gambling industry has taken to improve standards, and the growing focus on fair treatment of vulnerable customers. But further action is needed to support customers with mental health problems. We have identified three key actions that online gambling operators should take to demonstrate their commitment and improve outcomes for customers with mental health problems:

- Ensure safety by default
- Offer proactive support
- Suspend advertising and marketing during the pandemic.

#### Ensure safety by default

Many Research Community respondents suggested that online gambling operators should take steps to safeguard all customers by default, rather than relying on customer action to enable opt-in controls. Suggestions included placing default limits on the amount of spending over a time period, on deposits, on time spent gambling online, and on stakes.

“Set limits for everyone per week. If people reach their maximum every week, the limit should go down.”

*Expert by experience*

40. McManus S et al. Adult psychiatric morbidity in England, 2007: results of a household survey. The NHS Information Centre for health and social care. 2009.

41. McManus S et al (eds.) Mental health and wellbeing in England: Adult Psychiatric Morbidity Survey 2014. NHS Digital. 2016. Covers England only.



Setting default limits would directly reduce harm and also act as useful friction, disrupting customers with mental health problems who are struggling to control online gambling before problems escalate further. Customers who reach limits should be provided with information about support tools and services.

"I would want them to have some sort of welfare triage system to direct me to appropriate help and support, and for them to immediately freeze my account in the meantime."

*Expert by experience*

### Offer proactive support

Gambling companies routinely collect a wealth of data on customer behaviour, and many people with mental health problems feel that this should be used to identify signs of vulnerability and offer proactive support.

Some respondents described specific actions that they felt would help in certain situations. Operators should explore the benefits of personalisation: allowing customers to specify factors such as the trigger for intervention, adding personal messages that may be more salient and specifying preferred communication channels.

"Having been so out of control, I would want somebody to step in. I wish somebody had with me years ago."

*Expert by experience*

"I would want the company to reach out to me personally, not send me a blanket "Are you gambling too much?"

*Expert by experience*

This approach could directly address the difficulties that people with mental health problems can have staying in control of online gambling and seeking help promptly when required.

To intervene effectively, operators should:

To explore options for intervention, we presented Research Community members with a range of scenarios, and asked what, if anything, respondents would want their online gambling company to do in each case.

- Frame interventions as an offer of support, rather than a judgement of behaviour
- Develop and test messaging with people who have experienced gambling problems
- Ensure that customer-facing staff understand mental health problems and can respond appropriately. Staff must be equipped to refer customers to mental health, debt advice and gambling support services, given the close relationship between these issues
- Monitor customer behaviour post-intervention, and take further action if there are signs that problems persist.

We found high levels of support for gambling companies to be proactive: more than nine in ten respondents favoured action in each case. Many respondents felt that simply alerting them to a change in behaviour would be insufficient, particularly if they were unwell at the time, and favoured practical support or immediate action to prevent harm from escalating.

The extent to which online gambling operators have taken protective steps such as these should be a consideration in the government's review of the Gambling Act.

**Table 1: Action that Research Community members would like their online gambling company to take in different situations**

	Nothing	Tell me about this change	Tell me and tell me where to find support	Tell me and offer practical support (e.g. help me to set up a spending limit on my account)	Take immediate action to protect me (e.g. freeze my account)
<b>You started gambling for long periods of time without taking a break</b>	2%	5%	9%	24%	59%
<b>You started spending significantly more money than usual</b>	2%	6%	5%	30%	57%
<b>You repeatedly turned deposit limits on and off</b>	4%	3%	13%	34%	46%
<b>You started gambling at unusual times - for instance in the middle of night</b>	4%	10%	13%	30%	43%
<b>You started to bet on unusual things - for instance small-scale sporting events in different countries</b>	6%	14%	9%	36%	35%

Source: Money and Mental Health Survey of 238 people with lived experience of mental health problems. Base varies by row, between 163 and 165 people with lived experience of mental health problems.

## **Suspend advertising and marketing during the pandemic**

Nationally, six in ten (58%) online gamblers believe that gambling companies should not advertise online during the coronavirus crisis, with just 13% disagreeing.<sup>42</sup> People who have experienced mental health problems are more likely to hold this view. While the Betting and Gaming Council's recognition of the increased potential for harm during the crisis, and its temporary cessation of television and radio advertising was welcome, this was a very limited measure and not proportionate to the scale of the crisis.

People with mental health problems can find it harder to resist the pull of online advertising and marketing, which can lead to difficulties staying in control of online gambling. At a time of unprecedented pressure on the nation's mental and financial health, there is an increased risk that this will drive problematic gambling behaviour, such as people seeing gambling as the solution to financial problems brought on by the pandemic.

In recognition of the increased and continued risk of harm, online gambling operators should reinstate and extend their voluntary ban on advertising.

For it to be effective:

- It should last for as long as social distancing measures are in place. At this point, operators should review the evidence to see if there is still an increased risk of gambling adverts driving harm, before removing the ban. This review should involve independent experts
- The ban should include online advertising and safer gambling adverts
- Also included should be promotions, such as new customer offers, bonuses and free credit.

<sup>42</sup>. Money and Mental Health analysis of Populus online survey of 2,096 people, carried out 7-10 May 2020. Data is weighted to be nationally representative.

### 3.2 The role of online advertising platforms

The vast majority (85%) of Research Community respondents feel that it is impossible to avoid seeing online gambling adverts.<sup>43</sup> Some respondents who were recovering from gambling problems described the detrimental effect this can have.

“No escape with online adverts... they remind me of the mess I am in and I feel sick.”

*Expert by experience*

While online advertising platforms such as Google and Facebook do allow users to block certain advertising categories, few Research Community respondents had used this functionality to block gambling adverts, and some reported that this was a complex process. Common symptoms of mental health problems can make it harder for people to navigate complex websites and find necessary information. This inaccessibility may mean the users who would most benefit from this functionality currently find it harder to locate and use.

Online advertising platforms should repackage existing functionality into a simple gambling advert self-exclusion tool. This small change could empower users with mental health problems to improve their experience of online spaces and protect themselves from harm. Almost all (96%) Research Community respondents favour this idea.<sup>44</sup>

To maximise effectiveness, advertising platforms should:

- Involve people with lived experience of gambling problems in the design of the tool. This will help to ensure that it is framed as an empowering self-control tool, and that language used is sensitive and not stigmatising
- Work together to provide users with a single point of entry to self-exclude from gambling advertising across major online advertising platforms.

43. Money and Mental Health Survey. Base for this question: 129 people with lived experience of mental health problems who have gambled online.

44. Money and Mental Health survey. Base for this question: 161 people with lived experience of mental health problems.

### 3.3 The role of internet service providers

Internet service providers can play a key role in supporting customers with mental health problems to protect themselves from online gambling. Broadband providers routinely offer customers content filters, enabling them to block access to websites that contain sexual content, violence or gambling. While branding varies between providers, in most cases these tools are presented as a means of protecting children. This branding is inappropriate for adults who are trying to protect themselves from online gambling, and may drive shame and stigma, or dissuade customers from using these valuable tools altogether.

Internet service providers should reframe these tools and provide content controls for adults, to empower them to protect themselves from online gambling websites, and promote this offering as part of their strategy for supporting vulnerable customers. This functionality could be hugely beneficial for customers with mental health problems who struggle with impulsivity and vulnerable customers who are recovering from gambling problems.

### 3.4 The role of financial services providers

Almost half (47%) of online gamblers in our national polling believe that banks should do more to help people stay in control of their gambling,<sup>45</sup> and some Research Community respondents felt that support from banks would be more effective than intervention at the operator level. Many financial services providers have stepped up support for customers who struggle with gambling in recent years, and the Financial Conduct Authority has recognised this as good practice.<sup>46</sup>

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

*Expert by experience*

We have identified three key steps that financial services providers should take to further support customers' financial wellbeing:

- Offer proactive support
- Provide effective controls
- Set safe limits.

45. Money and Mental Health analysis of Populus online survey of 2,096 people, carried out 7-10 May 2020. Data is weighted to be nationally representative.

46. Financial Conduct Authority. GC19/3: Guidance for firms on the fair treatment of vulnerable customers. 2020.

## Offer proactive support

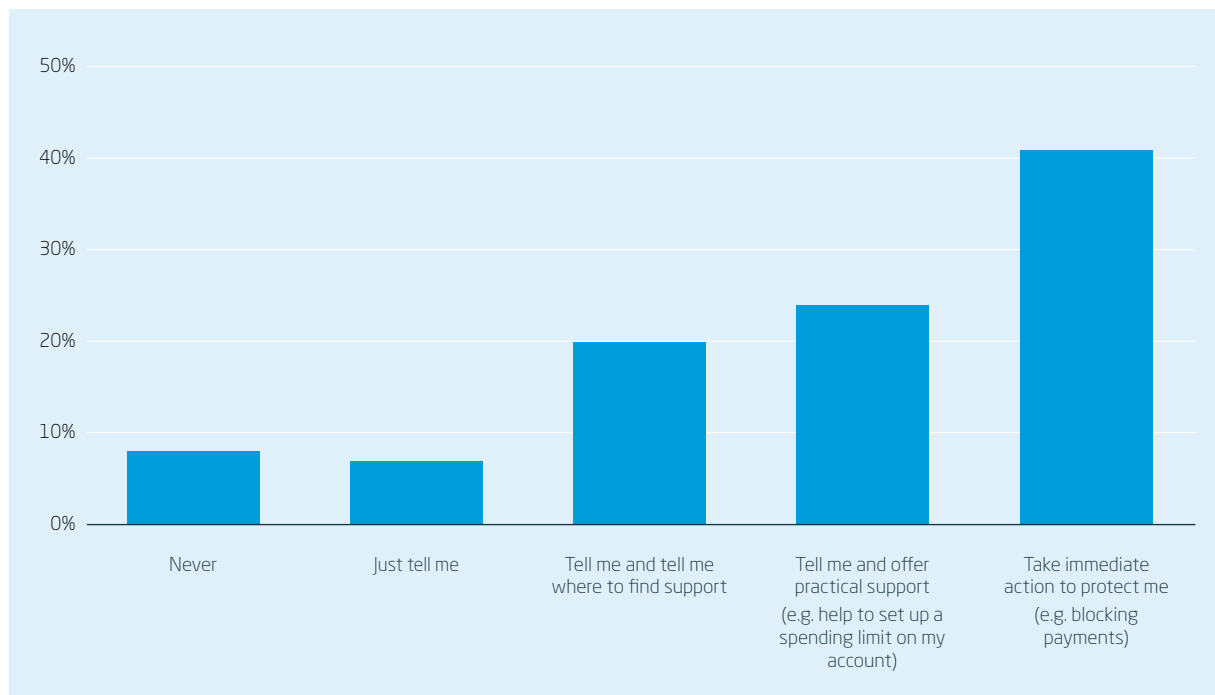
Research Community members demonstrated a significant appetite for financial services providers to take practical action if they identify an increase in gambling spending.<sup>47</sup> As Figure 2 shows, four in ten (41%) respondents would want their bank to take immediate action to protect them, with just 7% feeling that simply being alerted to this issue would be sufficient.

The volume and time of gambling transactions, transfers to e-wallets and the number of different gambling companies used, could all be useful indicators of gambling problems.

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

*Expert by experience*

**Figure 2: Action that Research Community members would like their bank to take if it spotted an unusual amount of spending on gambling**



Source: Alpin K and Holkar M. Data Protecting. Money and Mental Health Policy Institute. 2019. Money and Mental Health survey of 540 people with lived experience of mental health problems. Base for this question: 403.

<sup>47</sup> Some respondents did raise concerns about their data being used in the way, particularly if action from their provider was unexpected or was felt to be intrusive or insensitive. For a detailed exploration of best practice for designing proactive interventions see our report Data Protecting.

## Provide effective controls

Simple tools like gambling transaction blocks can be transformative for customers with mental health problems who otherwise struggle to control their gambling. All banks should offer this functionality and should explore additional flexible controls, such as the ability to cap spending or restrict spending at certain times.

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

*Expert by experience*

Flexible controls would enable customers to protect themselves from the risk of overspending during periods of poor mental health, as well as benefiting customers who want to cut down but do not feel able to stop gambling completely.

For control settings to be effective, providers should always impose a cooling-off period before removing or loosening restrictions. There is a significant risk of harm if customers are able to disable restrictions and gamble immediately during a period of poor mental health.

Nationally, just one in three (33%) online gamblers report knowing what tools banks can offer to help them stay in control of gambling,<sup>48</sup> and some Research Community respondents raised concerns that existing functionality was not reaching customers who would benefit most.

“[The gambling block] is on their app but it's not well publicised and it's a nightmare to find it.”

*Expert by experience*

Providers must ensure that control settings are easy to find and use, and should have a concerted strategy for raising awareness, to enable more customers to apply settings preemptively and protect themselves from harm.

## Set safe limits

Given both the lasting impact that online gambling problems can have on our financial and mental health, and the increased vulnerability of customers with mental health problems, financial services providers should consider setting safe gambling spending limits by default.

“[Financial service providers should] monitor spending on gambling websites, and set a limit beyond which payments will be blocked.”

*Expert by experience*

Providers should design limits with the aim of protecting customers from gambling spending that is likely to be unaffordable, and should consider lower limits for customers who are overdrawn, to account for the increased vulnerability of this group and the extra cost of gambling in this way. Providers already routinely limit customer cash withdrawals, and can limit gambling spending when transactions reach fraud or money laundering triggers.

Safe limits would make no difference to the majority of customers and would protect some of the most vulnerable from escalating harm. Providers should carefully weigh this against inconvenience to customers who wish to pass safe limits and can afford to do so. To minimise restriction, providers could allow customers who actively request to pass a limit to do so, and use this interaction as an opportunity to offer support.

48. Money and Mental Health analysis of Populus online survey of 2,096 people, carried out 7-10 May 2020. Data is weighted to be nationally representative.

### 3.5 The future of online gambling regulation

Above, we have set out practical changes that online gambling operators and others can make to prevent or reduce harm for people with mental health problems. We also see an important role for reform of gambling regulation. Currently, the onus is on players to take action to protect themselves from harm, which fails many people with mental health problems. Reform should focus on player safety, adjusting the online gambling environment to prevent severe harm, and better aligning operators' incentives with outcomes for vulnerable players.

While the Gambling Commission has considerable powers to adjust regulation, it has been slow to do so and its ability to adapt is somewhat constrained.<sup>49</sup> We welcome the government's commitment to review the Gambling Act, and its recognition that consumer protections have not kept pace with innovation and growth in the industry. The review should consider the powers, objectives and resources of the Gambling Commission, to ensure that it is able to make the changes set out in this section and respond to future developments in this innovative sector.

Future online gambling regulation should:

- Ensure player safety
- Place more responsibility on operators
- Ensure control settings are effective
- Make adjustments to game design
- The role of advertising and marketing.

#### Ensure player safety

Player safety should be a key focus of gambling reform. We welcome government action to limit harm for users of fixed-odds betting terminals, and recommend setting safe default limits across online gambling markets. This is a proportionate, preventative measure that would protect those who struggle to stay in control, without affecting most other players. We have urged online gambling operators to voluntarily introduce safe default limits to protect their customers, but in the long run, action across the market is required to ensure consistent safe outcomes.

"You shouldn't be able to bet £500 on a roulette spin, it's ridiculous... the local bookies are limited to £2 and that's bad enough as it is."

*Expert by experience*

Customers should be allowed to gamble beyond default limits if they request a higher limit and can demonstrate that they can afford to spend more. Higher limits should only be granted based on reliable evidence, for instance through bank data or credit checks, and the Gambling Commission should produce guidance to support operators with these decisions. Crucially, these customers should still be set limits to protect their safety, and higher limits should be regularly reviewed. This combination of safe limits and affordability checks should make the online gambling environment significantly safer, without requiring checks for most players.

<sup>49</sup>. National Audit Office. Gambling regulation: problem gambling and protecting vulnerable people. 2020.



### Place more responsibility on operators

Almost all (97%) Research Community respondents favour requiring online gambling companies to monitor how much customers are gambling and offer support if they spot problems.<sup>50</sup> Online gambling operators are data-rich and many employ sophisticated techniques to understand their customer base and target customers with specific messages at certain times. The Gambling Commission should require operators to deploy this capability to intervene early when customers show signs of problems.

“Early intervention would have saved me wasting my thirties wasting tens of thousands of pounds.”

*Expert by experience*

To support operators, and align their incentives with outcomes for vulnerable customers:

- The Gambling Commission should develop guidance on best practice for early intervention from gambling operators. This should include collaboration with people with lived experience of gambling problems and behavioural economists
- Online gambling operators should be required to report on the effectiveness of steps they have taken to identify and support customers showing signs of potential harm. If actions taken by operators are ineffective, and this results in customer harm, they should be subject to compliance action. This should include customer compensation, fines and ultimately loss of license.

### Ensure control settings are effective

Even if safe default limits are introduced across gambling markets, opt-in control settings can still play an important role, empowering people to regulate their gambling behaviour.

Online gambling operators should be required to make control-settings easy to find and simple to set up. Evidence shows that small adjustments to this process can increase uptake,<sup>51</sup> so the Gambling Commission should regularly review control-setting customer journeys and take action if enabling control settings is judged to be more difficult than other transactions.

The Gambling Commission should also review the speed with which users can loosen control settings to ensure that they are effective.

### Adjustments to game design

The steps outlined above should considerably reduce gambling-related harm while minimally disrupting most gamblers. However, regulation must balance harm to the most vulnerable with disruption to other customers. If harms to vulnerable customers persist, direct intervention to tackle the elements within the design of online gambling environments that drive harm may be warranted.

Research Community members suggested a number of specific adjustments to game design that could help.

“Ask them if they're sure they wish to bet. Have a message about what they could buy with the same amount of money.”

*Expert by experience*

50. Money and Mental Health survey. Base for this question: 164 people with lived experience of mental health problems.

51. The Behavioural Insights Team. Can behavioural insights be used to reduce risky play in online environments? 2018.

“I also think that there should be at least a two-step process for gambling that amounts to a large sum, to ask people if they’re sure they want to do so.”

*Expert by experience*

The government should equip the Gambling Commission to closely monitor customer outcomes across online gambling operators and game types, including granular data on player behaviour, losses, and indicators of problem gambling. The Gambling Commission should be empowered to make targeted interventions to game design where there is evidence of particular harm. This could include:

- Adding extra steps to deposit and spending customer journeys, to increase “friction”
- Steps to make spending feel more tangible (more like real money)
- Steps to make online gambling environments less immersive and appealing.

## The role of advertising and marketing

Nine in ten (88%) Research Community respondents favoured permanently banning online gambling advertising.<sup>52</sup> Many respondents felt overwhelmed by gambling adverts, and some felt that they were particularly difficult to resist during periods of poor mental health, which can lead to significant harm.

“All gambling [companies] should be banned from advertising on radio, tv and online. It destroys [the] lives of even the strongest people.”

*Expert by experience*

The coronavirus pandemic has heightened these risks. The Advertising Standards Authority has warned that many of us are currently more vulnerable to harm, and that lockdown has created a “captive audience” for advertisers.<sup>53</sup> Public opinion mirrors this concern, six in ten (58%) online gamblers believe that gambling companies should not advertise online during the coronavirus crisis, with just 13% disagreeing.<sup>54</sup>

In recognition of this unprecedented situation, we have called on the online gambling industry to reinstate and extend its temporary ban on advertising, for at least as long as social distancing measures are in place. If the industry fails to act, the government should consider introducing new rules to suspend gambling advertising at times when economic, or other conditions, put people at greater risk of harm driven by gambling advertising.

52. Money and Mental Health survey. Base for this question: 159 people with lived experience of mental health problems.

53. The Advertising Standards Authority and Committee of Advertising Practice. Gambling advertising and ‘lockdown’. 2020. <https://www.asa.org.uk/news/gambling-advertising-and-lockdown.html>. Accessed June 2020.

54. Money and Mental Health analysis of Populus online survey of 2,096 people, carried out 7-10 May 2020. Data is weighted to be nationally representative.

In the longer term, as part of its review of the Gambling Act, government should closely examine the role that advertising and marketing plays in driving gambling related harm, with a specific focus on vulnerable customers, including those experiencing mental health problems. If steps are taken to make the online gambling environment safer, the risks posed by advertising and marketing may lessen considerably and public attitudes may soften, but the government should consider whether the Gambling Commission and Advertising Standards Authority have sufficient powers to deal with harm in this area and if not, address this.

### 3.6 Conclusion and next steps

The internet has transformed our lives. This has frequently been for the better but it has brought new risks too. While gambling is a particularly striking example of how online spaces can interact negatively with symptoms of mental health problems, it is far from the only case. The government's recognition of these risks is welcome but financial harms online have not been given sufficient attention. The upcoming papers in this series on online harms will explore a number of these, showing how online environments are too often exposing people with mental health problems to a range and severity of dangers that would not be deemed acceptable offline. Action is needed to make sure everyone, regardless of their mental health, can enjoy online spaces.





MONEY AND  
MENTAL HEALTH  
POLICY INSTITUTE