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Gambling Explained

**The truth about gambling harm... and
what the industry has had to say**

Gambling Explained is a high-level summary of the available scientific evidence and industry lobbying efforts across ten topic areas in gambling-harm; independently written and funded by “Affected Other” researchers for the Gambling Act Review 2021.

A piece inspired by WHO: Tobacco Explained by Clive Bates and Andy Rowell

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Executive Summary

Chapter 1: Gambling and health

Publicly the industry denied and continues to deny the significance of gambling harm on a population level. This refusal to accept the reality is compounded by the industry's lack of funding in public health research, despite the WHO commenting on the need to prioritise gambling-harm on agendas due to the magnitude of harm from gambling being comparable to the harm accrued by alcohol-use disorder or major depressive disorder. Harms in affected others challenge the industry in two ways. First, measures to raise awareness and prevent gambling harms in individuals who do not gamble will reduce the appeal of gambling and contribute to its social unacceptability. Second, the 'freedom to gamble' argument is confounded if individuals who do not gamble are harmed. The industry has largely refused to acknowledge the significance of harms in affected others, individuals who gamble and suffer low-risk harms, moderate-risk harms, and legacy harms due to previous gambling. This situation has not been helped by the chronic underfunding and lack of independence in research, education, and treatment.

Chapter 2: Gambling and addiction

The industry consistently emphasises that gambling addiction affects a small minority of individuals, benefitting from the fact that gold-standard prevalence surveys were stopped after 2010 due to funding cuts. The industry reflects on the estimates generated by data from self-completion forms included in health surveys or telephone surveys. On the other hand, more recent online studies have reported much higher gambling addiction rates, but the industry has dismissed these higher rates. Additionally, the industry fails to reflect that harmful gambling and gambling addiction should be viewed as a continuum. Moreover, more than half of the harm in individuals that gamble is expected to occur at the low-risk and moderate-risk harm levels.

Chapter 3: Gambling in children and young people

Evidence from Great Britain reflects that gambling is one of the more popular activities among 11–16 year olds. However, the industry comment that most of this gambling is done legally through private betting, significant numbers of young people enter licensed gambling venues illegally. Brain imaging studies have shown that brain development continues until the age of 25. The brain area related to decision-making and addictive behaviour is among the last to develop. Thus, it is not surprising that gambling harms, similar to other harmful behaviours, are most common in 16–24 year olds. As well as being vulnerable to harms from their gambling with potentially devastating life-long effects, young people are especially susceptible to harms from a family member's gambling, which has not been considered in research until recently.

Chapter 4: Gambling and advertising

The industry maintains that advertising has no effect on consumption but instead helps operators differentiate product offerings and for customers to identify which brands are regulated and therefore can be trusted. Evidence from the Gambling Commission reflects the contrary. Younger adults, in particular, were more likely to be affected by advertising to spend money on gambling when they were not otherwise planning to. Worryingly, this phenomenon has been reported even among 11-16 year olds. The industry is keen to prevent meaningful reform on gambling advertising nationally and internationally because of its importance in driving gambling in the short-term and the long-term through a normalisation effect. The importance of advertising to the industry is highlighted by their lobbying against change and their expenditure.

Chapter 5: Gambling research, education, and treatment

Donations to gambling-harm research, education, and treatment efforts are made voluntarily. RET funding targets are currently based on an arbitrary percentage of net losses, and minimum funding targets have been consistently missed. Some operators have maintained their status as voluntary contributors in reducing and preventing gambling harm by donating as little as £5 across a year. Therefore, unsurprisingly, UK RET funding is also drastically lower than countries, including Canada, New Zealand, and Australia, that hold a public health approach to preventing gambling harm. Chronic underfunding and a lack of independence from the industry have meant that steps to tackle and prevent gambling harm have been woefully limited. Firstly, there is a lack of understanding of the significance of gambling harms on the population's health.

Additionally, there is an absence of dedicated studies, education, and treatment efforts to prevent and tackle disproportionate gambling harm in ethnic minority communities. At the time of writing, gambling-harm is also poorly recognised in health and social care, with gambling absent from guidelines and curriculums for health care professionals. Lastly, current safer gambling initiatives place the onus on the customer and are widely criticised as thin-veiled attempts to advertise brands.

Chapter 6: Design of gambling products

Online gambling has surged over the past decade. With reduced costs and increased accessibility, online gambling is highly profitable to the industry and is unsettlingly addictive for players. Most online games facilitate cognitive biases through the illusion of control and often contain characteristics that particularly appeal to younger customers. The industry has repeatedly resisted reform and suggested that product design has little influence on harm but somewhat down to the individual, despite clear evidence suggesting otherwise.

Chapter 7: Gambling and the way it is conducted

The gambling industry's public opinion has deteriorated significantly over the past decade; there are well-grounded concerns regarding industry exploitation of individuals on the addictive spectrum. Estimates suggest that half of the online industry's profits are generated from harmful gambling, where players are more likely to gamble, lose more money, and gamble at unsociable hours. The Gambling Commission has increasingly fined operators for regulatory failings, yet operators continue to profit substantially from failures and harmful gambling.

Chapter 8: Gambling and voluntary bans

The gambling industry's efforts to promote safer gambling are inadequate and often a thin-veiled effort to drive public relations. Self-exclusion is the most effective tool for individuals to regain control of their gambling. Yet, the process to self-exclude is unnecessarily complicated, which is further compounded by issues with awareness and accessibility of self-exclusion. Moreover, the Betting and Gaming Council's voluntary whistle-to-whistle ban has been unsuccessful despite being regularly proclaimed otherwise; not all operators volunteered, and the ban did not apply to sports sponsorships or online advertising. Without a comprehensive and mandatory ban, similar to tobacco advertising, gambling advertising will continue to shift to less regulated and less scrutinised mediums.

Chapter 9: Gambling operators as multinational corporations

The gambling industry is international; headquarters are based in low-tax and low-regulation countries, and online operators have global customers. The UK is strategically important, not only as a source of income but also for the unique and global exposure of its sports, particularly Premier League Football. Moreover, advertisement through football club

sponsorships can reach millions of fans in countries where gambling may be prohibited. Hence, many of these UK-based gambling corporations have huge worldwide influences.

Chapter 10: Gambling and crime

Although the Gambling Act 2005 clearly states gambling should be prevented as a source of crime or disorder, it has been linked to opportunity, duress, violence, and negligence crimes. Moreover, international and national studies have shown a disproportionate number of individuals suffering from gambling addiction in the prison population. Furthermore, gambling-related harm is omitted from screening as first-stage health assessment in correctional services dictated by NICE guidelines includes substance abuse but omits gambling. The industry has drastically downplayed the magnitude of crimes linked to gambling via blame deflection on the black market.

Chapter 1: Gambling and health

“The gambling-related burden of harm appears to be of similar magnitude to harm attributed to major depressive disorder and alcohol misuse and dependence. It is substantially higher than harm attributed to drug dependence disorder.”

WHO: The epidemiology and impact of gambling disorder and other gambling-related harm 2017 ¹

Summary

Gambling addiction was first formally recognised as a mental disorder by professionals in the US through the Diagnostic and Statistical Manual of Mental Disorders-III in 1980. Over the past two decades, gambling harm has emerged as a pressing public health issue globally. Domestic and international studies have reported statistical links between gambling harm in adults and suicide, mortality, and poor health. When faced with evidence of the links of gambling and harm to health, industry lobbyists have commonly steered away from admitting any responsibility; instead, they have promised research, reform, or reiterated commitments to safer gambling standards. Moreover, the industry has worked to associate itself with the NHS and other health organisations.

Gambling harm may be experienced by individuals that gamble, affected others of people who gamble, and by communities. Research from Australia in 2016 reported a taxonomy of harms over eight domains: financial, relationship, emotional, health, cultural, work or study, criminal activity, life course and intergenerational harms.

Responsible gambling mantras have largely replaced public health messaging in Great Britain. Meanwhile, ideas of risk-free gambling and safer gambling have been furthered. Current safer gambling ads seldom reflect the significance of gambling harm, especially on affected others, due to them being industry-supported. Similarly, specialist treatment options and awareness among health care workers remain challenges and are limited by such efforts being primarily managed with voluntary donations.

Moreover, public health research in New Zealand and Australia have explored the significance of gambling harm on quality of life by reporting disability weights. These disability weights allow researchers and public health stakeholders to understand the significance of gambling harm on the individual and the population through comparison to other health states. Based on this research, a WHO report found an "urgent need to place gambling on national and international public health agendas", among other things.

At the time of writing, little is known about the significance of harm in young people, individuals who previously gambled, and former affected others (legacy harm). Whereas gambling-harm has featured in Australia's Monash guidelines for healthcare professionals for over a decade, the UK's National Institute for Health and Care Excellence (NICE) is yet to begin reviewing the evidence on gambling harm.

What is known?

- Gambling-harm can manifest both in individuals that gamble and individuals that are affected by other people's gambling, as general, crisis, and legacy harms, across the domains of ² (*Detailed taxonomy in the appendix*)
 - Financial harm,
 - Relationship disruption, conflict or breakdown
 - Emotional or Psychological Distress
 - Decrements to Health
 - Cultural Harm
 - Reduced Performance at Work or Study
 - Criminal Activity
 - Lifecourse and Intergenerational Harms

- Harms in Family Member's (Affected Others) ³
 - 93% reported that their loved one's disordered gambling impacted their financial security (64% stating that the impact was significant)
 - 89% reported a reduction in available spending money and 88% a reduction in savings
 - 23% reported losing a major asset such as a car, home, or business, and 12% had become bankrupt
 - 82% reported that their loved one's disordered gambling impacted their work and/or education (37% stating that the impact was significant)
 - 76% reported reduced performance at work or study due to tiredness or distraction
 - 55% and 50% reported being late and absent, respectively
 - 99% reported that their loved one's gambling compulsion had harmed their health (46% stating that the impact was significant, 38% moderate, 15% slight)
 - 95% reported loss of sleep due to stress or worry
 - 64% reported reduced physical activity, 30% increased alcohol use, 33% increased tobacco consumption, 56% eating too much, and 44% eating too little
 - 29% reported neglecting their medical needs, 36% reported increased use of health services, and 21% reported requiring emergency treatment for health issues caused or exacerbated by their loved one's gambling
 - 16% reported committing acts of self-harm, and 8% had attempted suicide
 - 96% reported experiencing relationship harms (67% stating that the impact was significant)
 - 89% and 82% reported greater tension and conflict, respectively
 - 71% reported feeling excluded from others
 - 68% reported threatening separation or ending the relationship
 - 33% reported separating or ending the relationship with the family member who gambles and potentially related others
 - Other harms
 - 21% reported incidents of violence
 - 21% reported feelings of shame within their religious or cultural community
 - 7% reported engaging in petty theft or dishonesty as a consequence of their family member's gambling

- Other addictions
 - Family members of individuals with gambling disorder reported elevated rates of problematic use of substances:
 - Alcohol: 34.6%
 - Drugs: 21.2%
 - Legal highs: 3.2%
 - Prescription drugs: 5.0%
- Severity of gambling-harm on quality of life in Adults ^{4,5}

Disability Weights (where 0 = perfect health and 1 = death)

 - Schizophrenia: acute state: 0.76
 - Heroin and other opioid dependence: 0.64
 - Gambling disorder harm (PGSI 8 or more): 0.54 (NZ 18)
 - Manic episode of Bipolar Disorder: 0.48
 - Gambling disorder harm (PGSI 8 or more): 0.44 (AUS 17)
 - Migraine: 0.43
 - Moderate alcohol use disorder: 0.39
 - Moderate-risk harm gambling (PGSI 2-7): 0.37 (NZ 18)
 - Affected others at gambling disorder harms: 0.36 (AUS 17)
 - Affected others at moderate-risk harms: 0.33 (AUS 17)
 - Stroke: long-term consequences, moderate plus cognition problems: 0.31
 - Moderate-risk harm gambling (PGSI 2-7): 0.29 (AUS 17)
 - Mild alcohol use disorder: 0.26
 - Low-risk harm gambling (PGSI 1-2): 0.18 (NZ 18)
 - Urinary incontinence: 0.15
 - Affected others at low-risk harms: 0.17 (AUS 17)
 - Low-risk harm gambling (PGSI 1-2): 0.13 (AUS 17)
 - Hearing loss: complete, with ringing: 0.09
- Significance of gambling-harm on the population in Years of Life Lost due to Disability (YLD)
 - New Zealand (Adult population: 3.6m) ⁶
 - Combined total of years lost with gambling-harm related quality of life effects in the New Zealand Adult population: 162, 000 years
 - Anxiety and depressive disorders: 106, 000 years
 - Harms from someone else's gambling in adults: 94, 700 years (prevalence: 13.6%)
 - Alcohol – Hazardous drinking (>8 AUDIT): 87, 600 years
 - Harms from own gambling in adults: 67, 200 years (prevalence: 7.3%)
 - Diabetes: 26, 000 years
 - Drug use disorders: 22, 400 years
 - Stroke: 12, 900 years
 - Eating disorders: 3, 980 years
 - Victoria, Australia (Adult population 4.4m) ⁷
 - Major depressive disorder: 148, 000 years
 - Alcohol use and dependence: 148, 000 years
 - Combined total of years lost with gambling-harm related quality of life effects in the Victorian Adult population: 118, 000 years
 - Harms from own gambling in adults: 102, 000 years (past-year prevalence: 12.5%)

- Diabetes Mellitus: 22, 700 years
 - Harms from someone else's gambling in adults: 16, 300 years (past-year prevalence: 2.8%)
 - Cannabis dependence: 5, 780
- Significance of gambling-harm on the population in Years of Life Lost due to Mortality (YLL)
 - Research from the UK involving bank data from over 100, 000 customers found that high levels of gambling were associated with a 37% increase in mortality ⁸
 - The last Adult Psychiatry Morbidity Survey 2007 that considered gambling-harm reported that individuals with gambling disorder were more likely to have thoughts about suicide (19.2% vs 4.1%) and to have made a suicidal attempt in the past year (4.7% vs 0.6%) compared to individuals who do not suffer gambling-harm. ⁹
 - A study of 16-24 year olds living in Great Britain found that Men and Women who indicated gambling disorder harms were 9.0 and 4.9 times more likely to attempt suicide, after adjusting for anxiety, impulsivity, life satisfaction, and other factors ¹⁰
 - Standardised mortality ratios ¹¹
 - Men and Women in Sweden, aged 20-49 year olds and diagnosed with GD, were 19.3 times more likely to suffer from suicide when compared to the general Swedish population of the same ages
 - Men and Women in Sweden, aged 20-49 years old and diagnosed with GD, were 6.2 more likely to suffer from any mortality when compared to the general Swedish population of the same ages

What the industry said?

Michael Dugher, CEO of the Betting Gaming Council ¹²

"The UK's addiction rate stands at 0.5% of the adult population, which is low compared to the international standard. The rates have also remained 'broadly steady around or below one percent for the past 20 years.'"

Dugher frames the topic of gambling harm on the segment of adults suffering the most severe harms due to gambling in the past 12 months while omitting the experiences of affected others, individuals who previously had gambled, and individuals experiencing subclinical levels of gambling harm. Moreover, there are significant concerns with measuring gambling harm using self-completion forms included in health surveys, and as such, the stated 0.5% is expected to be a significant underestimate.

The industry rarely comments on affected others as it recognises that this is likely to be the most damaging to their public relations strategies. Instead, the industry benefits from the fallacious societal stigma that gambling addiction is the individual's fault; however, the same cannot be easily argued for loved ones, especially the children who suffer harm.

Gambling Commission in a briefing paper for Local Authorities and local Public Health providers February 2018 ¹³

"The numbers of those who experience harm as a result of gambling by others will be considerably greater than the number of people who harm themselves."

"These are not small numbers. They suggest a significant public health issue which has received remarkably little attention relative to other population level concerns."

The Gambling Commission makes clear why gambling harm should be considered as a public health issue. Identifying gambling as a significant public health issue is in direct contrast to how the Gambling Commission falls under the remit of the Department of Culture, Media and Sport (DCMS) instead of the Department of Health and Social Care.

Michael Dugher, CEO of the Betting Gaming Council ¹⁴

"NHS Charities said it wouldn't be possible for betting co's to make a direct donation, but they were happy for us to donate all the profits from this special fun virtual Grand National to help the NHS at this difficult time. Most people agree there's nothing wrong with this..."

Dugher states that NHS Charities were not accepting a direct donation from the gambling industry. This quote demonstrates the BGC's interest in associating with the NHS for the 4.8m viewers who tuned in to watch this virtual horse race which raised £2.6m. ¹⁵

"You don't have to bet. If you don't want to have a bet, please make a donation direct to NHS Charities. But millions of people do enjoy an occasional flutter & do so responsibly & safely."

Dugher argues that millions of people enjoy an occasional flutter while ignoring the millions that suffer gambling harm and the individuals who gamble frequently and make up significant amounts of the industry's profit.

Betting and Gaming Council ¹⁶

Betting and gaming companies and their staff play an active role in their communities supporting many charitable causes from Alzheimer's Society, and Prostate Cancer UK to Jessie May Children's Hospice and the Special Care Baby Unit at Borders General Hospital to name but a few.

The BGC is quick to align with health-related charitable causes yet continue to ignore that gambling-harms has significant health impacts while chronically underfunding meaningful research.

Betting and Gaming Council ¹⁶

"Suicide is a complex issue and the examination of any links to gambling or disordered gambling requires great care and sensitivity. We suggest that a collaborative and careful approach to understanding linkages is required. The aim of research should be to explore what is clearly a difficult subject and provide pragmatic solutions."

The BGC creates an aura of doubt around gambling-suicide, despite evidence from studies across the world reflecting that individuals with gambling-disorder are many times more likely to suffer from suicidal harm.

"Through continued funding by our industry over more than 20 years, these charitable services are able to provide free of charge treatment, support & advice services for anyone affected by gambling."

The BGC boasts of their voluntary funding for treatment services for harms caused by their industry. Thus, the industry demonstrates that treatment services are available due to the industry's generosity while ignoring issues with treatment access, awareness, and chronic underfunding.

Mark Etches, CEO of GambleAware ¹⁷

[Britain was] "in great danger of sleepwalking into a future public health storm over gambling-related harm".

Etches reflects on the numbers of 11–16 year olds with a gambling disorder and signifies concern for the future. Contrastingly earlier that year, evidence reported on by the World Health Organisation (WHO) reflected a worryingly significant ongoing neglected public health crisis with an "urgent need to place gambling on national and international public health agendas". ¹⁸

Chapter 2: Gambling and addiction

Summary

The potential for addiction is influenced by intrinsic biological factors, extrinsic factors, and factors related to the addictive agent's ability to activate the brain's risk-reward areas. Like other addictions, dopamine has a crucial and well-documented role in developing and maintaining Gambling Disorder (GD). Gambling addiction is most prevalent among younger people. Other risk factors include a parent who suffered from a gambling disorder, poor mental health status, poor general health status, unemployment, and minority ethnic backgrounds.

GD is a behavioural addiction characterised by compulsive involvement in gambling activities, despite severe adverse consequences. GD is defined in the Diagnostic and Statistical Manual of Mental Disorders as "persistent and recurrent problematic gambling behaviour leading to clinically significant impairment or distress". GD has been recently included in the disorder class of "substance-related and addictive disorders".

It is essential to recognise that significant harms can occur in individuals who do not meet GD's clinical threshold as the diagnosis represents the most severe end of addiction and harms. According to research from Australia, gambling harm in individuals with GD makes up only 15% of the overall gambling harm suffered by those that gamble. Most of the harms on a population level are accrued by individuals who may be on the spectrum of addiction but not at GD's threshold. These findings are analogous to the scenario for alcohol harm, where harmful drinking in those without severe dependency is responsible for more significant amounts of harm. However, unlike alcohol harm, which is grouped into a single disorder on a continuum with mild, moderate, and severe sub-classifications, gambling-harm at mild and moderate levels are often treated with contempt.

Industry lobbyists often comment on prevalence statistics of those suffering the most severe harms from their gambling. Through this narrative, the industry can hide behind the idea that gambling affects only a tiny minority of the overall population, neglecting that more than half of the gambling harm in individuals that gamble is attributable to low-risk harm and moderate-risk harm. Moreover, adult prevalence statistics following 2010 are primarily limited to self-completion forms in health surveys due to a funding cut instead of the gold-standard bespoke gambling prevalence surveys.

What is known?

- Twin studies investigating the genetics of pathological gambling have found that: ¹⁹
 - 'heritability of pathological gambling is estimated to be 50–60%;
 - pathological gambling and subclinical pathological gambling are a continuum of the same disorder;
 - pathological gambling shares genetic vulnerability factors with antisocial behaviours, alcohol dependence and major depressive disorder;
 - genetic factors underlie the association between exposure to traumatic life-events and pathological gambling'

- Risk factors for Gambling-Disorder (Odds Ratio): ^{20,21}
 - Parents regularly gambled but did not have a problematic relationship with gambling: 1.58
 - Current cigarette smoker: 2.46
 - 'Other' ethnic minority groups: 2.86
 - Unmanaged hypertension: 3.10
 - Asian/Asian British: 3.55
 - Black/Black British: 3.80
 - Unemployed: 4.02
 - Bad/very bad general health status: 6.17
 - Parents regularly gambled and had a problematic relationship with gambling: 7.32
 - A low Warwick-Edinburgh Mental Wellbeing score: 7.65

- Global rates of gambling-addiction in Adults
 - Great Britain
 - Meta-analysis of British Gambling Prevalence Surveys 2007 and 2010 (Gold-standard) ^{20,22}
 - Low-risk harm: 5.1 – 5.5%,
 - Moderate-risk harm: 1.4% - 1.8%,
 - Gambling disorder harm: 0.8% - 1.2%
 - Meta-analysis of self-completion forms included in health surveys 2012 – 2018 ^{21,23–25}
 - Low-risk harm: 2.5% - 3.9%
 - Moderate-risk harm: 0.8% - 1.1%
 - Gambling disorder harm: 0.5% - 0.9%
 - Meta-analysis of online surveys 2019 – 2020 ²⁶
 - Low-risk harm: 7.0% - 7.2%
 - Moderate-risk harm: 2.8% - 3.3%
 - Gambling disorder harm: 2.6% - 2.7%
 - Meta-analysis of telephone surveys 2016 -2020 ²⁷
 - Low-risk harm: 2.0% - 3.7%
 - Moderate-risk harm: 0.9% - 1.9%
 - Gambling disorder harm: 0.3% - 0.7%

- Isle of Man ²⁸
 - Gambling Prevalence Survey 2017: 7.0% low-risk harm & 1.5% moderate-risk harm & 0.8% gambling disorder harm
- Northern Ireland ²⁹
 - Gambling Prevalence Survey 2010: 8.2% low-risk harm & 5.9% moderate-risk harm & 2.6% gambling disorder harm ²⁹
 - Gambling Prevalence Survey 2016: 6.7% low-risk harm & 4.9% moderate-risk harm & 2.3% gambling disorder harm
- Scandinavia ³⁰
 - Denmark Gambling Prevalence Survey 2016: 3.6% low-risk harm & 1.2% moderate-risk harm & 0.4% gambling disorder harm
 - Finland Gambling Prevalence Survey 2015: 8.7% low-risk harm & 2.8% moderate-risk harm & 0.5% gambling disorder harm
 - Norway Gambling Prevalence Survey 2015: 7.7% low-risk harm & 2.3% moderate-risk harm & 0.9% gambling disorder harm
 - Sweden Gambling Prevalence Survey 2015: 4.2% low-risk harm & 1.3% moderate-risk harm & 0.4% gambling disorder harm ³¹
- Italy
 - Problem Gambling Survey 2018: 4.1% low-risk harm & 2.8% moderate-risk harm & 3.0% gambling disorder harm ³²
- Victoria, Australia
 - Gambling Prevalence Study 2014: 8.9% low-risk harm & 2.8% moderate-risk harm & 0.8% gambling disorder harm ⁷
 - Gambling Prevalence Study 2019: 6.7% low-risk harm & 2.4% moderate-risk harm & 0.7% gambling disorder harm ³³
- New Zealand
 - Meta-analysis of survey results 2010 - 2016: 3.1% low-risk harm & 1.5% moderate-risk harm & 0.5% gambling disorder harm ³⁴
 - Health Survey 2012: 2.0% low-risk harm & 1.0% moderate-risk harm & 0.2% gambling disorder harm ³⁵
 - National Gambling Study 2012: 5.0% low-risk harm & 1.8% moderate-risk harm & 0.7% gambling disorder harm ³⁶

What the industry said?

Betting and Gaming Council ¹⁶

“Rates of problem gambling in Great Britain are stable and low by international standards and we are committed to doing more to ensure safer gambling”

The BGC omits consideration for the vast majority of individuals who suffer gambling-harm and instead focuses on the smaller population who suffer the most severe forms of harm. Moreover, the BGC states that gambling disorder harm rates are stable despite the absence of a gold-standard prevalence study since 2010 due to a funding cut.

Michael Dugher, CEO of the Betting Gaming Council ³⁷

“I recognise the concerns people have when around 0.6 per cent of those who bet are classed as ‘problem gamblers’.”

Dugher demonstrates a lack of understanding of gambling harm by stating that 0.6% of those who bet suffer from a gambling disorder. Contrastingly, the most recent gold-standard study in 2010 reflected that approximately 1.6% of individuals that gambled in the past year suffer from the most severe form of addiction. After excluding individuals who exclusively play on the lottery and those who do not gamble regularly, this rate would be far higher. Moreover, the harms suffered by non-adults are entirely omitted. Notably, the gambling disorder harm rate is much higher in 11-16 year olds where 5.1% of individuals who gambled in the past year or 1.9% of the overall population affected by gambling disorder.

“Of those problem gamblers, a smaller but still significant number are ‘disordered’ or addicted gamblers.”

Dugher also demonstrates a confused understanding of addiction, as the most severe form of harm is at the gambling disorder level. As ever and despite the evidence, the industry refuses to embed an understanding of addiction and gambling-harm as being on a continuum and thus ignore the harms suffered by individuals who gamble and experience low-risk harms and moderate-risk harms.

“That might be a tiny fraction – and we shouldn’t forget of course that millions of people gamble safely – but the effect of addiction on these individuals and their families can be devastating.”

Here the CEO of the BGC, quite unusually, recognises that family members can suffer devastating harms but omits the statistic that between 6% to 7% of adults have reported suffering affected other harms in Great Britain.

Michael Dugher, CEO of the Betting Gaming Council ³⁸

“For millions of people, it is a carefree leisure activity, and they do so perfectly safely and perfectly responsibly.”

Dugher uses the term “millions of people” to describe the number of individuals who gamble with no significant consequences while neglecting that millions of people suffer significant harm from gambling.

“But we recognise, as do the Government, as do campaigners and others that there is a small group of people who can have a problem with this, and in some cases it can be very, very severe.”

Dugher suggests that there is only a small group of people who suffer harm from gambling. Furthermore, Dugher and colleagues often implies that campaigners wanting reform are prohibitionists and have an issue with gambling as a leisure activity, despite evidence from lived experience campaigners showing that this claim is not valid.³⁹

“What we're saying is you've got to get the regulation right because what we don't want is to drive customers away from safer gambling on the regulated high standard sites to the illegal black market offshore companies.”

Paradoxically, Dugher highlights the concern of black market offshore companies while failing to recognise that before 2014, a large number of remote operators were not regulated, and the vast majority of companies continue to base offshore to avoid the UK's corporation tax. Moreover, remote operators are global by nature and thus have customers in the black market in other countries.

Brigid Simmonds, Chair of the Betting and Gaming Council⁴⁰

“Just as we intervene with our customers so banks should as well:”

Simmonds deflects responsibility for safer gambling to banks, such that just like operators, banks should intervene to prevent gambling-harm. However, operator interventions are often limited to safer gambling messages as operators seldom close accounts that are profit-making for the industry.

“We take our responsibility to our customers incredibly seriously and we are determined to raise standards and improve safer gambling,”

Simmonds then repeats vague commitments to raising standards and improving safer gambling.

Brigid Simmonds, Chair of the Betting and Gaming Council⁴¹

... “we have worked together on BetRegret”...

Simmonds comments on her role in developing the “BetRegret” campaign, which has been widely criticised for furthering stigma by placing responsibility on customers, potentially increasing self-blame, and for being drowned out by the sheer volume of contradictory betting advertisements.

Michael Dugher, CEO of the Betting Gaming Council⁴²

“Place you bets now please... #RouletteBoy”

“I thought you liked casinos, young Matt?”

Dugher uses social media to mock someone who is now abstinent; in doing so, he demonstrates his contempt for those who have suffered gambling-harm, the legacy effects of those harms, and the chronic nature of addiction.

Chapter 3: Gambling in children and young people

The Gambling Act 2005 sets out three licensing objectives ⁴³

“preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

ensuring that gambling is conducted in a fair and open way

protecting children and other vulnerable persons from being harmed or exploited by gambling”

Summary

The third licensing objective in the Gambling Act 2005 specifically singles out children as a vulnerable group who should be protected from being harmed or exploited by gambling. Gambling-harms in young people are of particular significance; young people are more vulnerable to harm, and these harms can have a significant impact, both now and in the future. Moreover, as well as experiencing harm from their gambling, young people can also be susceptible to harm from an immediate family member's gambling through parental neglect or from other stresses, as detailed in the appendix.

There is consistent and robust evidence from imaging studies that brain development continues through adolescence and does not complete until the age of 25 or later. Furthermore, the prefrontal cortex, an area of the brain tied to addictive behaviours due to its role in regulating reward regions of the brain and its involvement in higher-order executive function, is among the last to develop. Moreover, similar to other addictive products, such as alcohol and recreational drugs, the age of onset for first gambling is significantly associated with gambling disorder in later life.

In Great Britain, the legal age for gambling varies by product. Some gambling products have no age-restrictions, others restricted for individuals 16 years and older, with traditional gambling products having the legal age of 18. Remarkably, loot boxes, although the most popular wagering activity among under 16s, are not yet considered a form of gambling and therefore unregulated. On top of games of chance where children can lose money, popular video games such as Grand Theft Auto 5 feature simulated gambling where players can gamble for virtual currencies.

Despite all this, young people have profoundly limited access to appropriate treatment, help, or support. Notably, contrasting with the widespread recognition for substance-use harm, gambling-harm does not feature in competency-based curriculums for specialists in child and adolescent psychiatry (CAMHS).

What is known?

- Legal definitions of youth and age of maturity ⁴⁴
 - The age of majority is 18 years in all EU Member States except for Scotland, where children are considered to have full legal capacity from the age of 16 years.
 - In EU Member States, the term 'youth' is the only term used to describe an age group that goes beyond 18 years. It is often used when States want to include young adults as well, sometimes up to the age of 30 years.
 - The UN's definition on the term 'youth' includes all persons between the ages of 15 and 24 years; UNESCO uses a wider and more flexible definition depending on the context.
 - In the EU Strategy for Youth, the term 'youth' refers to teenagers and young adults aged between 13 and 30 years.
 - EUROSTAT statistics consider the youth population to be aged between 15 and 29 years.

- Brain development during adolescence and youth ⁴⁵
 - Brain maturation occurs during adolescence due to a surge in the synthesis of sex hormones.
 - Types of studies that have provided evidence that structural and functional brain development is an active stage of maturation until at least the age of 25
 - neuromorphological,
 - neurochemical,
 - neurophysiological,
 - neurobehavioral,
 - neuropharmacological, and
 - brain imaging studies

- Legal age of gambling by product ⁴⁶
 - No age limit
 - Private or Non-Commercial Betting
 - Equal chance gaming
 - Prize gaming at entertainment centre or travelling fair
 - Category D gaming machines
 - Games of chance in video-games (not considered gambling)
 - 16 years old
 - National lottery tickets and scratchcards in shops (18 from October 2021)
 - National lottery tickets and scratchcards online (18 from April 2021)
 - 18 years old
 - Casino, betting shops or licensed premises
 - Category A, B1, B2, B3, B3A, B4 and C gaming machines
 - Football pools

- Gambling as an activity among secondary school students (11-16 year olds)
 - >1 million 11-16 year olds gambled in the past-year ⁴⁷
 - In 2018, gambling (14%) was more popular as a past-week activity among 11-16 year olds than alcohol use (13%), tobacco use (4%), and drug-taking (2%) ⁴⁸

- In 2019, gambling (11%) was less prevalent as a past-week activity among 11-16 year olds than alcohol use (16%), but more common than tobacco cigarettes (6%), e-cigarettes (7%), and drug-taking (5%) ⁴⁷
- In 2019, the most prevalent past-week gambling activity (excluding video game gambling) among 11-16 year olds was placing a private bet for money (e.g. with friends) at 5%, followed by: ⁴⁷
 - Fruit or slot machines (e.g. at an arcade, pub or club): 4%
 - National Lottery scratchcards which you bought in a shop: 3%
 - Playing cards for money with friends: 3%
 - Personally placing a bet at a betting shop: 3%
 - Lotto (the main National Lottery draw): 2%
 - National Lottery instant win games on the internet: 2%
 - Any other National Lottery games (e.g. EuroMillions): 2%
 - Other Lotteries: 2%
 - Bingo at a bingo club: 2%
 - Bingo at somewhere other than a bingo club: 2%
 - Personally visiting a betting shop to play gaming machines: 2%
 - Playing other gambling machines: 2%
 - Personally visiting a casino to play casino games: 2%
 - Gambling websites/apps where you can win real money: 2%
 - Any other gambling: 3%
- The most popular form of games of chance with money are in video games
 - Ever-played ⁴⁷
 - Used in-game items to open loot boxes/crates/packs to get other in-game items within the game you were playing
 - 11-16 year olds: 28%
 - Paid money to open loot boxes/crates/packs to get other in-game items within the game you were playing
 - 11-16 year olds: 23%
 - Bet with in-game items on website outside of the game or privately (e.g. with friends)
 - 11-16 year olds: 3%
 - Past-year ⁴⁹
 - Paid money to open loot boxes
 - 10-16 year olds: 20%
 - Past-week ⁵⁰
 - Paid money to open loot boxes
 - 11-14 year olds: 27%
 - 18+ year olds: 16%
- The Gambling Commission ran a test at the Royal Ascot in 2014, where all 20 bookmakers served a 16-year old without asking for proof of age, and consequently received a written warning. In 2019, this test was repeated, with 7 out of 17 failing to ask for ID. ^{51,52}
- Gambling-harm among children and young people
 - In 11-16 year olds ^{47,53}
 - Meta-analysis of prevalence in 2018 – 2020 ^{47,48,53}
 - By frequency
 - Past week gambling: 9% - 14%

- Past year gambling: 36% - 39%
- By harm level
 - Low-risk and moderate-risk harm gambling: 2.2% - 2.7%
 - Gambling disorder harm gambling: 1.7% - 1.9%
 - Other gambling: 32% - 33%
- DSM-IV-MR J harms: ⁴⁷
 - Found yourself thinking about gambling or planning to gamble
 - often: 1.7%
 - Gambled to escape from problems or when you were feeling bad
 - sometimes or often: 2.0%
 - Felt bad or fed up when trying to cut down on gambling
 - sometimes or often: 1.2%
 - Needed to gamble with more and more money to get the amount of excitement you want
 - sometimes or often: 1.9%
 - Spent much more than you planned to on gambling
 - sometimes or often: 1.6%
 - Taken money without permission to spend on gambling (any one or more of the following: dinner money or fare money, money from family, money from things you've sold, money from outside the family, or somewhere else)
 - Any one or more of the above: 3.8%
 - Gambling led to risk relationships (any one or more of the following: arguments with family/friends or others, missing school):
 - Any one or more of the above: 2.5%
 - Gambling ever led to telling lies to family/friends or others
 - once or twice or sometimes or often: 2.1%
 - After losing money by gambling, have you returned another day to try to win back the money you lost
 - more than half the time or every time: 1.6%
- Other harms ⁵³
 - Lost sleep at night because you went to bed late because you were gambling
 - rarely or sometimes or often or all the time: 2.5%
 - often or all the time: 1.1%
 - Lost sleep at night because you were worried about own gambling
 - rarely or sometimes or often or all the time: 1.7%
 - often or all the time: 0.3%
 - Stopped you from buying things you wanted
 - rarely or sometimes or often or all the time: 4.3%
 - often or all the time: 1.3%
 - Made it hard for you to concentrate at school
 - rarely or sometimes or often or all the time: 3.8%
 - often or all the time: 1.4%

- Made it hard for you to put effort into your homework or personal study
 - rarely or sometimes or often or all the time: 3.4%
 - often or all the time: 1.4%
 - Made you not feel comfortable around your friends
 - rarely or sometimes or often or all the time: 2.7%
 - often or all the time: 0.9%
- In 11-16 year olds harmed by an immediate family member(s) gambling ⁵³
- Felt bad because of gambling among family members: 5.5% ⁴⁷
 - Lost sleep at night because of worrying about a family member's gambling
 - rarely or sometimes or often or all the time: 4.9%
 - often or all the time: 1.3%
 - Not had enough food (food at home or money on school canteen card/account)
 - rarely or sometimes or often or all the time: 1.8%
 - often or all the time: 1.1%
 - Stopped you from belonging to clubs or doing activities you like doing
 - rarely or sometimes or often or all the time: 1.3%
 - often or all the time: 1.0%
 - Stopped you from going on trips (e.g. family holidays or school outings)
 - rarely or sometimes or often or all the time: 1.8%
 - often or all the time: 0.9%
 - Parent's or guardians have less time to spend with you
 - rarely or sometimes or often or all the time: 1.6%
 - often or all the time: 1.0%
 - More arguments or tension at home
 - rarely or sometimes or often or all the time: 2.1%
 - often or all the time: 1.2%
 - Has made you feel sad
 - rarely or sometimes or often or all the time: 2.4%
 - often or all the time: 0.6%
 - Has made you feel worried
 - rarely or sometimes or often or all the time: 2.9%
 - often or all the time: 0.7%
- In 18-24 year old university students ⁵⁴
- 47% of students gambled in the past 12 months
 - 8% of which suffer low-risk harms
 - 8% of which suffer moderate-risk harms
 - 8% of which suffer gambling disorder harms
 - Overall, 11% of students suffer significant harm from their gambling, and 4% of students suffer the most severe level of harm from their gambling

What the industry said?

Matthew Hill, Director of the Gambling Commission ⁵¹

“This was a pretty poor result. Preventing under 18s from gambling is one of the most basic obligations every bookmaker has, on or off the course. The industry must do better or operators are likely to find themselves facing formal sanctions.”

Hill warns operators of the possibility of sanctions for failing to protect children from gambling as all twenty operators tested allowed a 16 year old to gamble at the Royal Ascot 2014.

Richard Watson, Executive Director of the Gambling Commission ⁵²

“Every single gambling business must protect children from gambling but the on course bookmakers results have remained unacceptable.

Despite various educational attempts to raise standards, by ourselves and the trade bodies, the on-course sector has historically performed poorly in both underage gambling test purchase exercises and Think 21 testing.

Pass rates have failed to meet the standards expected and the sector has consistently performed to levels below those we see in other gambling and age restricted products. By way of example, over the past four years, the on-course sector has a pass rate of around 35% for Think 21 testing.”

Watson reports that on-course bookmakers fail to meet the standards expected in preventing underage gambling following an investigation where 7 out of 17 operators allowed a 16 year old to gamble at the Royal Ascot 2019.

Michael Dugher, CEO of the Betting Gaming Council ¹²

“We have already done a lot and we are ready to go even further to prevent underage gambling”

Dugher refuses to accept responsibility for industry failings in meeting one of the three licensing objectives. Instead, he uses a vague statement and commitment to defend the prevalence of underage gambling.

Michael Dugher, CEO of the Betting Gaming Council ¹²

“far from trying to entice children to gamble, regulated members of the BGC have a zero tolerance approach to betting by under-18s,” and that they welcome the raising of the age limit from 16 to 18 for lottery products.

Dugher suggests that regulated members of the BGC have a zero-tolerance approach to underage gambling, despite prevalence statistics and undercover investigations by the Gambling Commission reflecting the contrary.

Michael Dugher, CEO of the Betting Gaming Council ³⁷

“I’m also pleased to see that new age-verification and ID checks have resulted in literally hundreds of thousands of accounts being closed recently, where the customer was unable or unwilling to meet the new strict criteria.”

Dugher reports feeling pleased that the Gambling Commission set rules that mandate operators to verify customers age and identity before allowing them to gamble.

Tim Miller, Executive Director of the Gambling Commission ⁵⁵

“There's no doubt that today's figures on children and gambling should make people sit up and listen, he said. But while discussions about children gambling might conjure up images of kids sneaking into bookies or sitting alone on their iPad gambling on an online casino, our latest research paints a more complex picture. The most common activities that children gamble on are not licensed casinos, bingo providers or bookies. Instead we found children preferred to gamble in informal environments, out of sight of regulation - private bets between friends or playing cards with their mates for money.”

Miller states that gambling figures for young people are worrying but argues that underage gambling is not happening mainly in betting shops or online. Although non-regulated forms of activity such as video game gambling and private betting may be more common among 11-16 year olds, staggering numbers of this population are able to enter licensed betting premises and gamble.

Marc Etches, CEO of GambleAware ¹⁷

“Computer gaming with gambling presents real future challenges to the current regulatory framework. We've been saying for some time we have concern about the normalisation of gambling for young people...”

Etches points to the regulatory gap in recognising games of chance in computer gaming as part of gambling.

Michael Dugher, CEO of the Betting Gaming Council ⁵⁶

“tackling betting by under 18s is a top priority. BGC members have a zero tolerance approach to underage betting - unlike the illegal, online black market - but are determined to do more to protect young people.”

Dugher acknowledges that betting by under 18s is an issue and that it is a top priority. He also states that BGC members have a zero-tolerance approach to underage betting despite consistent statistics of 11-16 year olds entering licensed betting premises such as casinos and betting shops in the past week.

Chapter 4: Gambling and advertising

Summary

Over the past decade, gambling advertising has grown exponentially. In the present day, gambling advertising is ubiquitous, with a distinct presence across various mediums, including online advertising, social media, affiliates, television, radio, newspapers, sponsorships, and physical ads in stores. The widespread nature of gambling advertising has meant inevitable exposure to vulnerable groups, such as young people and individuals with special educational needs and disabilities. Moreover, the volume of ads has led to a normalisation effect, such that young people are growing up in an era where gambling is seen as a normal part of everyday life. This phenomenon is particularly noticeable in sport.

Advertising is vital to the gambling industry for one encompassing reason: increasing consumption and increasing yields. Increased gambling can be broken down into activity among new customers and returning customers. The importance of advertising to the industry is demonstrated by the sheer size of investments made and its fierce opposition to meaningful regulation in Great Britain and abroad.

Like the tobacco industry, the gambling industry maintains the notion that advertising does not affect consumption but merely helps promote safer gambling by directing customers to regulated brands and helps customers differentiate offerings between brands. However, the industry would not spend as much on advertisements if it did not increase customers' gambling losses and increase industry profits.

Online advertising is particularly significant for the gambling industry as it benefits from targeting and the accessibility of online gambling, where ads facilitate a more direct link to the product.

According to the Advertising Standards Authority, there are several themes to the concerns around gambling advertising and these are:

- Links to problem gambling
- Children's exposure
- Online media
- Societal expectations
- Aggressive advertising
- Misleading advertising

Some of the industry has recognised that there are significant issues with advertising, including the sheer volume of ads, their presence in sports, and ads' ability to reach young people in sports and online. However, despite these well-grounded concerns, little meaningful action has been taken. Instead, industry efforts have been self-heralded as successes demonstrating the industry's ability to self-regulate. Recent industry measures, which have been criticised for include the 'whistle-to-whistle' advertising ban and the use of safer gambling messages during the pandemic, are discussed in more detail in the voluntary bans chapter.

What is known?

- Advertising spend by the UK Gambling Industry
 - According to the Advertising Association, the UK's gambling industry advertising spend grew from £0.17bn to £0.24bn between 2010 and 2013 (after adjusting for inflation) at an increase of 40% or a year on year increase of 13.3% ⁵⁷
 - 2010 = £0.15bn (0.95% of total spend)
 - TV: £0.07bn
 - Press: £0.04bn
 - Internet: £0.01bn
 - 2011 = £0.17bn (1.07% of total spend)
 - TV: £0.08bn
 - Press: £0.04bn
 - Internet: £0.03bn
 - 2012 = £0.21bn (1.27% of total spend)
 - TV: £0.12bn
 - Press: £0.05bn
 - Internet: £0.03bn
 - 2013 = £0.24bn (1.36% of total spend)
 - TV: £0.14bn
 - Press: £0.05bn
 - Internet: £0.02bn
 - According to Regulus Partners, the UK's gambling industry advertising spend grew from £1.07bn to £1.56bn between 2014 and 2017 (after adjusting for inflation) at an increase of 46% or a year on year increase of 15.3% ⁵⁸

Prior to 2014, remote operators were not required to have a GB gambling license (discussed in more detail in chapter 9: gambling operators as multinational corporations)

- 2014 = £1.00bn (5.4% of total spend) ⁵⁹
 - Internet: £0.72bn (9.9% of all online advertising spend)
 - Online Marketing: £0.40bn
 - Affiliates: £0.28bn
 - Social Media: £0.04bn
 - TV: £0.16bn (3.2% of all TV advertising spend)
 - Sponsorship: £0.03bn
 - Other Offline: £0.09bn
- 2017 = £1.56bn (7.0% of total spend) ⁶⁰
 - Internet: £1.20bn (10.4% of all online advertising spend)
 - Online Marketing: £0.75bn
 - Affiliates: £0.30bn (54.3% of all affiliate advertising spend) ⁶¹
 - Social Media: £0.15bn (5.9% of all social media spend)
 - TV: £0.23bn (4.6% of all TV advertising spend)
 - Sponsorship: £0.06bn
 - Other Offline: £0.07bn

- Advertising exposure
 - Young People
 - 11-24 year olds in the past month ⁶²
 - 85% reported seeing gambling advertising on TV (including national lottery adverts)
 - 70% noticed gambling adverts in betting shops on the high street, window displays as well as promotions on shop floors and near tills
 - 66% reported seeing gambling promotions on their social media channels
 - 11-16 year olds ⁴⁷
 - 70% were exposed to gambling advertising or sponsorship at all in the past year
 - Exposed at all in the past year (exposed at least once a week)*
 - 59% (33%) were exposed to ads on TV
 - 52% (24%) were exposed to ads linked to sports events
 - 50% (24%) were exposed to social media websites
 - 45% (20%) were exposed to other websites (excluding social media)
 - 43% (21%) were exposed to sponsorships on TV or radio
 - 40% (18%) were exposed to sponsorships in sports venues
 - 37% (13%) were exposed to ads on posters/billboards
 - 31% (11%) were exposed to ads in newspapers
 - 12% follow gambling companies on social media platforms like Facebook, YouTube and Instagram
 - 11% had ever received direct marketing from gambling companies about gambling
 - Emails: 4%
 - Messages via Youtube: 3%
 - Texts: 3%
 - Messages via Instagram: 3%
 - Messages on Facebook: 2%
 - Messages via Snapchat: 2%
 - Messages via Twitter: 2%
 - Messages on another social media website: 1%
- In adults (16+ year olds)
 - 87% of adults (16+) has seen or heard gambling advertisements or sponsorships in the past year ²⁴
 - Exposed at all in the past year (exposed at least once a week)*
 - 79% (50%) were exposed to ads on TV
 - 72% (45%) were exposed to gambling sponsorships on TV or radio
 - 65% (33%) were exposed to gambling sponsorships on sports merchandise
 - 64% (33%) were exposed to gambling sponsorships in sports venues

- 63% (31%) were exposed to gambling advertisements online (non-social media sites)
 - 62% (23%) were exposed to gambling advertisements on posters/billboards
 - 61% (27%) were exposed to gambling associations with sporting competitions
 - 58% (31%) were exposed to gambling advertisements on social media
 - 51% (23%) were exposed to gambling advertisements in newspapers
 - 45% (18%) were exposed to gambling advertisements on the radio
 - ODDSbible, an emerging affiliate brand that is part of the LADbible Group, boasts over 1m followers in under 1 year of operation, with 79% of these followers being between 18 and 34 years old and 96% being male ⁶³
- Significance of targeting and data analytics ⁶⁴
 - A case-study of Sky Bet and companies used by Sky Bet and an individual with Gambling Disorder (Flutter Entertainment)
 - TransUnion: a large credit scoring agency that owns CallCredit, Signal, and Iovation
 - CallCredit
 - 34 page breakdown of financial history including information on:
 - bank accounts,
 - loan defaults,
 - debts,
 - mortgages
 - and monthly payments.
 - Iovation
 - A spreadsheet containing 19, 000 fields of data including:
 - device identification numbers
 - network information about
 - Signal
 - A document containing personal characteristics including:
 - history of playing slots
 - favourite sports to bet on
 - Interpretation of data by Sky Bet
 - “win back” customer worth about \$1, 500 if he started gambling again
 - customer would be receptive to gambling promotions that featured Las Vegas
 - Actions by Sky Bet
 - sent emails to customer promoting a chance to win more than \$40,000 by playing slots

- Advertising effects
 - Spent money on gambling after seeing a gambling ad or marketing when they were otherwise not planning to
 - 11-16 year olds: 5% (1 in 20) ⁴⁷
 - 16+ year olds who gamble online: 44% (1 in 2) ²⁴
 - By age
 - 18-24: 61%
 - 25-34: 56%
 - 35-44: 49%
 - 45-54: 45%
 - 55-64: 31%
 - 65+: 26%
 - By type
 - Free bets and bonuses: 29%
 - TV: 20%
 - Online: 16%
 - Social Media: 16%
 - Newspaper: 11%
 - Billboards: 9%

What the industry said?

William Hill PLC Annual Report and Accounts 2015 ⁶⁵

"[Gambling has] increased over time, with the National Lottery and TV advertising making gambling more socially acceptable as a leisure activity while mobile devices are making the product more accessible"

William Hill recognises the role of advertising over the long-term in normalising gambling and the growing role of mobile devices in increasing accessibility of gambling products.

Stephen van Rooyen, CEO of Sky in the UK and Ireland ⁶⁶

"Yet again, the gambling industry are ignoring the fact they spend five times more on online marketing than they do on TV," van Rooyen said. "By cutting TV ads, they'll simply spend more online, bombarding people's smartphones, tablets and social media feeds with even more gambling ads."

Van Rooyen recognises that the industry is keen to avoid meaningful change with online advertising as this is the most effective form of advertising.

GVC Holdings PLC Annual Report 2019 ⁶⁷

"The Group also unilaterally ended all UK football shirt sponsorship and perimeter board advertising and has encouraged others in the industry to follow suit."

GVC Holdings recognises an issue with football sponsorships and takes steps to address it, leaving space for other operators to take their place.

Betting and Gaming Council ¹⁶

"The fact that only companies licensed by the Gambling Commission may advertise in the UK provides an important means for customers to identify legal from illegal operators. It also provides a means for companies to inform gambling consumers about the products that they enjoy."

Like the Tobacco Industry in the past, the Betting and Gaming Council publicly denies or omits the role of advertising in increasing gambling-harm. In this statement, the BGC paraphrases Philip Morris, who in 1987 said that advertising 'may influence the choice of one brand over another'. ⁶⁸

Philip Bowcock CEO of William Hill, Annual Report 2018 ⁶⁹

"This issue is one I have been speaking about for some time. I was on the record in 2016 saying I had concerns about the level of gambling advertising, for example, at 4 pm on a Sunday afternoon. The tone of the adverts, the number of them and the potential impact on young people have all been raised as concerns."

Unusually for the industry, Bowcock recognises issues with advertising including the tone of the content, the volume, and the potential for impact on young people.

Philip Bowcock CEO of William Hill, Annual Report 2018 ⁶⁹

"Most of our advertising is during live sport and it's then that we find young people are most likely to see gambling advertisements. The average under-18 audience of a Premier League match on Sky Sports is 96,000. Major events like the World Cup attract hundreds of thousands more young viewers. That is far too many young people seeing a product that isn't appropriate for them."

Hypocritically, Bowcock highlights an issue with advertising during live sports, while William Hill is the Scottish Cup's official sponsors. Moreover, William Hill also sponsored England and the FA Cup in 2014, through the FIFA World Cup in 2014, and secured the boxer Anthony Joshua as a brand ambassador in 2018.

Bet365 ⁷⁰

"The business said it spent more in marketing as it tried to entice betters with offers linked to the 2018 World Cup, which was part of this period."

Bet365 look to benefit from the exposure of events like the World Cup.

Mr Green Annual Report 2017 ⁷¹

"Digital communication gives us useful data for us to analyse which messages and channels are effective. In this way, we are constantly expanding our knowledge about what is relevant to the customer."

Mr Green, a subsidiary of William Hill, recognise that digital targeted advertising can benefit from data analytics.

William Hill PLC Annual Report and Accounts 2015 ⁶⁵

"Historically, affiliates drove a lot of traffic to our sites. Now, as we have increasingly focused on our core, regulated markets, TV advertising, search engine optimisation and PPC [pay-per-click] account are much more important. These channels accounted for [circa] 73% of our marketing spend and all drive a lower cost per acquisition."

William Hill recognises the increasingly important role of digital advertising in lowering costs and increasing ad effectiveness to shareholders.

Ladbrokes PLC Annual Report 2015 ⁷²

"We have helped to run a high impact TV and advertising campaign to educate people about the risks of gambling and how to stay in control. We are fully aligned with the GB Gambling Commission's objectives to ensure that gambling is crime free, fair and open and children and vulnerable people are protected and indeed commit to these objectives across the whole of our business wherever we operate"

Ladbrokes reports their role in educating people about gambling-risks and their commitment to being fully aligned with the Gambling Commission's objectives. Despite this commitment, Ladbrokes failed multiple customers between November 2014 and October 2017 and was fined £5.9m in 2019.

Michael Dugher, CEO of Betting Gaming Council ⁷³

“We welcome the Committee’s understanding of the role of advertising and the lack of real evidence of any link between gambling advertising and problem gambling.”

Like the tobacco industry in the past, Dugher’s statement reflects the idea that advertising does not affect consumption. Moreover, Dugher fails to recognise evidence from the Gambling Commission that reflects approximately 1 in 20 11-16 years old go on to gamble when they were not otherwise planning to because of gambling advertising.

Chapter 5: Gambling research, education, and treatment (RET)

Summary

Investment into gambling-harm research, education, and treatment (RET) is currently made voluntarily. At present, minimum funding targets are not set on need and are based on an arbitrary percentage of net losses. However, due to donations' voluntary nature, the minimum funding targets have been missed for the past two consecutive years. Meanwhile, operators have maintained their status as voluntary contributors to RET efforts by donating as little as £5 across a period of 12 months.

RET funding in the UK is significantly lower than in other countries where a public health approach to gambling harm has been enacted. Notably, RET funding shortfalls reflect a disparity between the industry's purported commitments to reducing gambling harm and their lack of actions in delivering meaningful change. Moreover, some of the more substantially funded RET initiatives have been criticised for industry ties and a lack of independent and critical evaluations evidencing their effectiveness.

The UK is relatively far behind in terms of research into gambling-related harms relative to some other countries. Research evaluating the significance of harm to health on the UK population through measurements of disability-adjusted life years, and studies measuring the costs of impact, are desperately needed as part of a public-health approach. Despite being the primary funding source of research, the industry has created an atmosphere of doubt and regularly calls for more research.

For over a decade now, research has consistently reflected that individuals from ethnic minority backgrounds are several times more likely to be affected by gambling harm. However, dedicated studies to explore this phenomenon further have been limited and largely absent. Furthermore, treatment statistics reflect that individuals from ethnic minority backgrounds are far less likely to receive specialist help and support. Similarly, despite significant evidence of the effect of gambling-harm on health, gambling is yet to feature in medical education curriculums for medical students, speciality curriculums for Psychiatry and General Practice, or NICE guidelines for health care practitioners. Instead, gambling-harm specialist services reach a fraction of the harmed population, which is relatively far fewer than the results achieved by substance use treatment services.

Gambling education was recently introduced into the PSHE statutory guidance; however, the framework does not apply to independent schools and is only statutory for years 10 and 11. Additionally, gambling features as one of the learning objectives in "internet safety and harms" contrastingly, "drugs, alcohol, and tobacco" are covered as a separate topic with their distinct learning objectives.

Safer gambling initiatives and awareness campaigns organised or funded by the industry place the onus for safe gambling on the consumer. Such campaigns are in stark contrast to the evidence, which reflects a significant genetic component to addiction. Thus, responsible gambling messages have been widely criticised as being thinly veiled advertisements.

What is known?

- Research, Education, and Treatment (RET) spending in Great Britain is comparable to that of some states in the US, and is relatively a fraction of what is spent in Canada, Australia, and New Zealand
 - GambleAware (the charity responsible for managing and distributing RET efforts and funding in Great Britain) asks all those who profit from the gambling industry in Great Britain to donate a minimum of 0.1% of their annual Gross Gambling Yield (GGY) directly to GambleAware
 - 2017 - 2018: 0.07% (£9.5m/£14.4bn) ⁷⁴
 - 2018 - 2019: 0.07% (£9.6m/£14.3bn) ⁷⁵
 - 2019 - 2020: 0.07% (£10.1m/£14.2bn) ⁷⁶
 - A review by the Gambling Commission in 2018, which drew on input from GambleAware and the Advisory Board for Safer Gambling (RSGB), reported that hypothetical RET scenarios could cost between £21.5m to £67.0m ⁷⁷
 - The Gambling Commission compared RET spending in Great Britain with other countries in 2018 ⁷⁷

Jurisdiction	RET spend (£m)	Number of PGs	RET spend per PG (£)
Great Britain	8.26	430,000	19
Canada			
British Columbia	3.40	26,974	126
Manitoba	1.93	2,006	964
New Brunswick	0.43	6,201	70
Nova Scotia	1.97	5,462	361
Ontario	22.27	66,703	334
Prince Edward Island	0.13	1,068	125
Quebec	11.32	26,935	420
Saskatchewan	2.49	10,498	237
USA			
California	6.33	511,781	12
New York	2.17	186,475	12
Nevada	1.02	61,044	17
Florida	0.69	180,709	4
Pennsylvania	4.71	222,190	21
Australia			
New South Wales	10.55	39,840	265
Queensland	3.40	16,698	204
Victoria	22.63	35,600	636
New Zealand	9.70	23,500	413

- Treatment
 - Source of referrals into treatment services
 - Gambling ⁷⁸
 - Self, family, and friends: 92%
 - Health services and social care: 3%
 - Criminal justice: 1%
 - Substance misuse services: 0%
 - Other: 3%
 - Alcohol only ⁷⁹
 - Self, family, and friends: 66%
 - Health services and social care: 22%

- Criminal justice: 6%
 - Substance misuse services: 3%
 - Other: 4%
 - Non-opiate and alcohol ⁷⁹
 - Self, family, and friends: 64%
 - Health services and social care: 17%
 - Criminal justice: 10%
 - Substance misuse services: 3%
 - Other: 6%
 - Non-opiate only ⁷⁹
 - Self, family, and friends: 66%
 - Health services and social care: 15%
 - Criminal justice: 10%
 - Substance misuse services: 2%
 - Other: 7%
 - Opiate only ⁷⁹
 - Self, family, and friends: 56%
 - Health services and social care: 9%
 - Criminal justice: 25%
 - Substance misuse services: 7%
 - Other: 3%
- Percentage of populations reached by National Gambling Treatment Services ⁷⁸
 - 0.02% of individuals who gamble and suffer low-risk harm
 - 0.03% of affected others completed treatment
 - 0.30% of individuals who gamble and suffer moderate-risk harm
 - 1.00% of individuals who gamble and suffer gambling disorder harm in Great Britain completed treatment
- Disproportionately affected population groups ⁸⁰
 - (*Observed = % of population receiving treatment in 2019/20, Expected = % of population affected by gambling disorder harms from the last British Gambling Prevalence Study*)
 - Age
 - 16-24 year olds: Observed: 11% & Expected: 30%
 - 25-34 year olds: Observed: 42% & Expected: 26%
 - Ethnicity
 - White: Observed: 89% & Expected: 66%
 - Asian or Asian British: Observed: 5% & Expected: 19%
 - Black or Black British: Observed: 3% & Expected: 9%
 - Other: Observed: 3% & Expected: 7%
- Research
 - Gaps in the literature
 - Population health measures of loss of healthy life have never been conducted in the GB population (discussed in more detail in chapter 1: gambling and health)
 - Prevalence of affected other harms were not measured at all prior to 2019

- Great Britain has only had one cost of impact studies, and this has been limited to some of the direct costs to the government
 - Cost of impact studies for gambling disorder gambling in Sweden and Czech Republic have reported that costs are approximately twice the amount of tax revenue generated ^{81,82}
- The last gold-standard prevalence study was conducted in 2010
- The only dedicated quantitative study of gambling-harm in ethnic minority communities was published in 2020 using secondary data following a consistent picture of disproportionate harms in ethnic minority communities across prevalence studies since 2007 ^{83,84}
- Out of 116 registered clinical studies, only one is in the UK ⁸⁵
- Funding gaps
 - The Adult Psychiatry Morbidity Survey (APMS) 2014 omitted gambling despite finding a significant relationship between gambling and suicidal harm in 2007
 - Gambling Commission spending on prevalence studies research ⁸⁶⁻⁹⁴
 - 2009/10: < £446,000
 - 2010/11: < £368,000
 - 2011/12: £192,000
 - 2012/13: £51,000
 - 2013/14: £169,000
 - 2014/15: £275,000
 - 2015/16: £652,389
 - 2016/17: £651,634
 - 2017/18: £778,357
 - 2018/19: £795,143
- Education
 - PSHE Curriculum (updated September 2020 to include gambling) ⁹⁵
 - Internet safety and harms
 - the similarities and differences between the online world and the physical world, including: the impact of unhealthy or obsessive comparison with others online (including through setting unrealistic expectations for body image), how people may curate a specific image of their life online, over-reliance on online relationships including social media, the risks related to online gambling including the accumulation of debt, how advertising and information is targeted at them and how to be a discerning consumer of information online.
 - how to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviours.
 - Drugs, alcohol and tobacco
 - the facts about legal and illegal drugs and their associated risks, including the link between drug use, and the associated risks, including the link to serious mental health conditions.
 - the law relating to the supply and possession of illegal substances.
 - the physical and psychological risks associated with alcohol consumption and what constitutes low risk alcohol consumption in adulthood.

- the physical and psychological consequences of addiction, including alcohol dependency.
- awareness of the dangers of drugs which are prescribed but still present serious health risks.
- the facts about the harms from smoking tobacco (particularly the link to lung cancer), the benefits of quitting and how to access support to do so.

What the industry said?

Betting and Gaming Council ³⁷

“Importantly, the largest BGC members are committing an additional £100 million to research, education and treatment (RET) over the next four years.”

The BGC announced a voluntary commitment to increase RET funding following calls for a statutory levy that would mean independence between the industry and prevention and treatment efforts. At the end of the four years, funding will increase ten-fold, demonstrated the industry’s ability to fund RET despite it chronically underfunding it for several years. This voluntary commitment also signals the industry’s acceptance that existing RET measures are insufficient.

Initially, the funds were to be allocated to Action Against Gambling Harms. However, with little notice, the BGC revoked this and instead changed the recipient to GambleAware. Researchers have stressed their concerns to decision-makers and highlighted the need for a levy that funds prevention and treatment while being free from real or perceived industry influence. The researchers also reflected that the unilateral decision-making in funding allocations is one way of the industry exerting influence. ⁹⁶

Peter Jackson, CEO of Flutter Entertainment PLC ⁹⁷

“GambleAware has a long track record in commissioning treatment services and working with providers for the benefit of problem gamblers. Through the provision of this unprecedented level of financial support, we aim to achieve a step-change in the treatment and counselling available to those experiencing gambling-related harm.

Through the provision of this unprecedented level of financial support, we aim to achieve a step-change in the treatment and counselling available to those experiencing gambling-related harm.”

Jackson focusses on the need for a step-change in treatment services, implying that most of the incoming funds for RET will be spend on treatment. Worryingly, public health monitoring of gambling-harm is still limited to counting the numbers of individuals affected in the past-year. To allow gambling-harm to be considered in the context of other issues and for efforts to tackle gambling-harm to be monitored appropriately, there is a desperate need for research that evaluates the significance of harms instead of simply the numbers affected.

Nigel Huddleston, Minister for Sport, Tourism and Heritage ⁹⁸

“We have been clear that the gambling industry has a responsibility to protect people from gambling-related harm and support those who have been affected. I welcome the Betting and Gaming Council now outlining how it will deliver on leading operators’ pledges to bolster research, education and treatment. We will monitor closely the progress of these new measures and continue to encourage the wider industry to step up”

Huddleston reports on the industry's need to keep up with the Gambling Commission’s licensing objectives and reflects trust that the industry will now tackle and prevent gambling-harm voluntarily.

Betting and Gaming Council ¹⁶

“The vast majority of gambling activity in Great Britain is carried out in a fair and transparent fashion”...“most people who gamble in this country do so with companies licensed by the regulator.”

The BGC take the minority view as only about a third of the population agree that gambling is carried out in a fair and transparent fashion.

Ian Proctor, Chairman of Flutter UK & Ireland ⁹⁹

“We believe the way forward is taking a risk-based approach founded on evidence. This means not considering affordability in isolation, but in the context of many other data points including frequency of bets and deposits, personal circumstances, time, products used and, crucially, changes in usual patterns of behaviour for each customer. When all these inputs are considered together, we can take an impactful approach to player protection.”

Proctor identifies the need to be evidence-led and for affordability to be judged alongside other data points, implying that such basic measures are not utilised already in player protection.

Responsible Gambling Fund ¹⁰⁰

“RGF said the funding partnership with the Great Foundation was unworkable thanks to increasing interference from gambling industry stakeholders pressuring the Great Foundation as to how to spend the money. A spokesman for the RGF said the gambling industry “has much stronger interest in funding treatment than it does in funding research”.

The RGF reported that the industry had a substantial interest to interfere and disrupt RET efforts.

Martin Lycka, Senior VP of US Regulatory Affairs & Responsible Gambling at Entain Group ¹⁰¹

“Our approach, Advanced Responsibility and Care (ARC), will combine the best academic research and life experience with industry-leading data science and AI to create what we believe is the first pro and personalised approach to player protection. And we’ll be trialling this in the UK this summer.”

Lycka associates the ARC with academic research and other technologies to suggest that emerging player protections efforts will be more meaningful.

Chapter 6: Design of gambling products

Summary

The Gambling Industry has grown over the past decade, primarily due to the upsurge of online gambling.

Online gambling products are subject to:

- reduced costs,
- increased accessibility,
- improved advertisement effectiveness,
- increased vulnerability to cognitive biases,
- and increased potential for neurostimulation.

Electronic gaming machines and online casino products have been repeatedly associated with unsettlingly high gambling addiction levels among players. These products have structural characteristics that affect human decision-making and behaviours, and therefore addiction potential, such as:

- free bet offers,
- high event frequencies,
- random ratio reinforcement schedules,
- near misses,
- losses appearing as wins,
- multiline betting, and
- exaggerated audible and visual reinforcements ¹⁰²

In the UK, fixed-odd betting terminals (FOBTs), a type of electronic gaming machine, quickly proliferated in clusters before drawing attention and campaigns for change due to their addictive potential. Recently, the maximum individual stake allowed for FOBTs was reduced from £100 to £2. However, this change took several years to be enacted with resistance from the government, primarily due to the sector's concerns regarding job losses. The estimated job losses resulting from reducing the maximum stake were greatly overstated, as, before the regulation change, physical betting shops were already in decline due to the ongoing increase in online operations.

Though similar in style and addictiveness to FOBT's, operators and legislation have not attempted to alter the wagering limits of online fixed-odds betting. Early evidence on live in-play sport-betting and cash-out features are also hypothesised to contain structural characteristics that facilitate cognitive biases through illusions of control to consumers. Gambling products are also designed to maximise appeal among possible customers. Notably, a significant number of online slot games are expected to appeal to younger customers who have some familiarity with particular names, characters, animations, or other graphics. Furthermore, these products often contain animated characters, which are expected to disproportionately attract younger customers and propagate cognitive biases around the level of risk involved. The same issues are also expected to be suffered in fantasy-team styled products, which essentially involve adapting popular sport fan games into gambling games. One example of this, the Football Index, which contains structural characteristics that lead towards cognitive biases and appeal to young people, worryingly has been allowed to operate with a license under a fraudulent business model.

Newly introduced changes to online slot games include rules on the speed of play and near misses; and are due to be implemented in November 2021. Characteristically and despite

clear evidence, the industry has previously denied any association of gambling-harm and the type of gambling product. Characteristically, the industry has instead sought to deflect blame on to the individuals who suffer harm until changes are mandated by regulation.

What is known?

- Gross gambling yield of remote betting, bingo, and casino ¹⁰³
 - 2013: £0.9bn
 - 2014: £1.1bn
 - 2015: £2.2bn (remote operators required to register for a GB license)
 - 2016: £4.2bn
 - 2017: £4.8bn
 - 2018: £5.3bn
 - 2019: £5.7bn

- Football Index (Great Britain Gambling Commission license: 09/09/15 – 11/03/21) ¹⁰⁴
 - 09th September 2015: License approved
 - 2nd October 2015: Launched
 - January 2018: 100k users
 - July 2018: Shirt sponsor for Bristol Rovers announced ¹⁰⁵
 - June 2019: Shirt sponsor for Nottingham Forest announced ¹⁰⁶
 - Late 2019: 500k users
 - January 2020: Gambling Commission warned “an exceptionally dangerous pyramid scheme under the guise of a ‘football stock market’” ¹⁰⁷
 - August 2020: Shirt sponsor for QPR ¹⁰⁸
 - 11th March 2021: Administration and license suspended

- A non-exhaustive list of examples of gambling products that utilise cartoon animals, fairy tales, colourful exaggerated graphics, and names, that may appeal particularly to children and young people
 - Adventure Trail
 - Age of the Gods
 - Age of Dragons
 - Aquaman
 - Batman The Riddle Riches
 - Berry Berry Bonanza
 - Captain’s Treasure
 - Djinn of Storms
 - Dragon Champions
 - Dragon Spark
 - Dynamite Digger
 - Fluffy Favourites
 - Halloween Fortune
 - Hansel and Gretel
 - Jack and the Beanstalk
 - Justice League
 - Kings Court
 - Lara Croft Temples and Tombs
 - Loco the Monkey
 - Mad Max Fury Road
 - Monopoly
 - Norse Book of Dwarves
 - Norse Gods and Giants
 - Piggy Payout
 - Pirate Princess
 - Prince of Olympus

- Rainbow Rewards
- Rainbow Riches
- Reacttoonz 2
- Red Riding Hood
- Rick and Morty
- Sahara Riches Cash Collect
- Sinbad
- Spartacus Super Colossal Reel
- Terminator
- The Goonies
- The Mask of Zorro
- The Nutcracker
- Transformers
- Voyage of Adventure
- War of Gods

- Proportion of individuals who gambled in the past year with gambling disorder per type of activity
 - Great Britain ^{20,22,109,110}

Activity	BGPS 1999 % (DSM-IV)	BGPS 2007 % (DSM-IV)	BGPS 2010 % (DSM-IV)	BGPS 2010 % [at least monthly gambling] (DSM-IV)	Health Survey 2016 % (DSM-IV or PGSI)
National Lottery Draw	0.7	1.0	1.3	1.5	1.0
Any other Lottery	2.0	2.1	1.3	2.8	1.5
Scratchcards	1.5	1.9	2.5	4.0	1.8
Football pools	1.0	3.5	7.5	9.9	7.2
Bingo	2.0	3.1	2.9	4.1	3.9
Slot machines		2.6	4.0	8.7	6.4
Online slot machine style games/instant wins			9.1	17.0	9.2
Horse races	1.8	1.7	2.9	9.1	3.3
Dog races	3.7	5.2	7.1	19.2	9.5
Events [other than horse or dog races] with a bookmaker	5.8	6.0			13.1
Sports betting			4.4	8.1	5.1
Betting on non-sports events			7.8	13.8	
Fixed Odds Betting Terminals		11.2	8.8	13.3	13.7
Betting exchange		9.8			5.4
Spread betting		14.7	7.5	10.7	8.0
Table games in a casino	5.6	5.2	6.8	13.9	7.4
Private betting	2.1	2.3	3.1	7.6	2.5
Fruit machines	2.6				
Poker at a pub/club			12.8	20.3	8.5

- Sweden ¹¹¹

Activity	In Store: Sweden 2015 % (PGSI)	In Store: Sweden 2018 % (PGSI)	Online: Sweden 2015 % (PGSI)	Online: Sweden 2018 % (PGSI)
Lotteries	2	2	3	3
Horse-racing	5	2	10	4
Sports betting	7	5	8	6
Poker	11	19	19	26
Slot machine/casino games	9	18	23	30
Bingo	7	3	11	7

- Timeline of Fixed Odds Betting Terminals ¹¹²
 - 2001 - Fixed Odds Betting Terminals (FOBTs) introduced
 - 2005 - approximately 20,000 FOBTs ¹¹³
 - 2007 - approximately 30,000 FOBTs ¹¹³
 - 2016 - The APPG on FOBTs recommends a reduction to £2 spin
 - 2017 - Treasury ignores Gambling Commission advice that FOBTs are high-risk
 - 2018 - DCMS recommends £2 maximum
 - 2019 – 32,810 FOBTs ¹⁰³
 - 2019 - the maximum bet on FOBTs was changed from £100 to £2

What the industry said?

Neil Goulden, Chair of the Association of British Bookmakers ¹¹⁴

"There is very clear evidence that problem gambling is about the individual and not any specific gambling product or products.

"Altering stakes and prizes is not an effective form of player protection, nor does it balance the constant regulatory dilemma of allowing the vast majority of our eight million customers to enjoy their leisure time as they see fit, whilst protecting the small minority who do develop problems with their gambling.

"At the same time, the ABB recognises the need for effective consumer protection and we will be introducing a 'Code of Responsible Gambling in LBOs', which will build on current best practice and give consumers the self-help tools they need to avoid excessive or irresponsible gambling.

"In doing so, the ABB is putting consumer and player protection at the core of responsible gambling in the UK."

Goulden purports evidence that is distinctly against a consistent global evidence base which has repeatedly demonstrated that some gambling products are more addictive and harmful than others. Notably, Goulden shifts the responsibility from the industry who benefits from addiction to the individual who suffers from it.

Michael Dugher, Member of Parliament for Barnsley East ¹¹⁵

"More gamblers have problems with scratchcards and slot machines than FOBTs. The review must be widened. And they have to stop beating up on high street betting shops."

While still an MP and three years before taking the CEO role for the industry lobbying group the BGC, Michael Dugher opposed a government crackdown on FOBTs, citing a couple of different reasons. First, Dugher states that individuals with gambling disorder played the national lottery more than FOBTs. Although the national lottery is vastly more popular as a product, this sentence is worryingly misleading as FOBTs have significantly higher addiction rates than the national lottery.

Secondly, Dugher said such action would harm jobs in high street betting shops. Both excuses fail to tackle the issue of gambling harm caused by FOBTs. Such statements are designed to derail the conversation by deflecting other issues while providing zero solutions.

Betting and Gaming Council ⁷³

"The BGC are already working with the Gambling Commission on new affordability checks and a new code of conduct for game design, including slowing spin speeds on games and removing some in game features."

The BGC in working with the Gambling Commission, admit that they have responsibility and control over harmful gambling. In this statement, the BGC also acknowledges the need for reform in affordability checks and the structural characteristics of products such as game features and speed of play.

The Gambling Commission ¹¹⁶

“Proposals around the design of slots games are just the first step in keeping players safe. Slots is an area which has seen technological innovation in terms of product design and we expect operators to continually show an equal, and indeed greater, commitment to innovate in terms of consumer protection.

Regulatory intervention needs to keep pace with this and the proposals in this consultation form part of a comprehensive package of work we are taking forward to make online gambling safer”

Gambling Commission suggests that efforts on online slot game design are just a first step in keeping players safe. Research since 2010 has reflected that online slot games have among the highest rates of addiction by activity, suggesting a significant delay between evidence and action.

Brigid Simmonds, Chair of the Betting and Gaming Council ¹¹⁷

"I am pleased with our members' hard work and continued commitment to delivering substantial progress on the three safer gambling challenges set by the Gambling Commission on high value customers, advertising and game design.

The progress reported today including restricting under 25's from qualifying for high value customer accounts; strengthened advertising rules and games with slower speeds and the removal of some functionality comes despite difficult operating circumstances during the COVID-19 crisis.

These measures, along with our recently announced 10 pledge action plan for COVID-19 safer gambling and our 22 industry safer gambling commitments will significantly transform and improve the environment for our customers and the wider public.

We agree with the Gambling Commission that there is still more work to do and we will rise to the ongoing challenge."

Following pressure from campaigners and the Gambling Commission, Simmonds acknowledges significant issues with industry practices surrounding high-value customers, advertising, and game design. Simmonds then vaguely comments on the industry's progress and commitments and again acknowledges the need to transform industry practices.

Chapter 7: Gambling and the way it is conducted

Summary

Over the past decade, public opinion of gambling and the way it's conducted in Great Britain has consistently and significantly deteriorated. There are well-grounded concerns of the regulated industry's exploitative nature towards individuals on the addiction spectrum. Ultimately, there is no requirement for operators to prevent harm in those showing signs of addiction, and evidently, the industry's bottom-line benefits from these high-value customers.

There is significant analysis reflecting that individuals on the addiction spectrum:

- wager larger amounts,
- lose more money,
- gamble more frequently, and
- gamble at less social hours

relative to individuals who gamble but do not suffer gambling harm. By utilising this understanding, estimates indicate that more than half of the industry's profits are derived from players who are on the addiction spectrum. In line with this analysis, the Gambling Commission's evidence using data from nine different operators reflects that significant percentages of deposits are universally derived from a small minority of VIP scheme customers.

Over the past few years, the Gambling Commission has increasingly fined operators who are found to have exploited customers or for other failings through regulatory settlements. Moreover, operators have been reported to coerce individuals into settlements that repay victims of thefts related to gambling on the condition of non-disclosure agreements or confidentiality provisions that may, in turn, discourage the Gambling Commission from being informed by incidents of failings.

Lastly, there are concerns that gambling-harm disproportionately affects ethnic minority communities and individuals in areas of deprivation, which may be in part due to the agglomeration of betting shops in these areas.

What is known?

- Percentage of adults agreeing that gambling is conducted fairly and can be trusted¹¹⁸
 - 2010: 48%
 - 2011: 49%
 - 2012: 49%
 - 2013: 42%
 - 2014: 41%
 - 2015: 39%
 - 2016: 34%
 - 2017: 33%
 - 2018: 30%
 - 2019: 29%

- Gambling industry profits from harmful gambling
 - Research of bank data reflects that the top 1% of individuals that gamble surveyed spent 58% of their income on gambling⁸
 - Online gambling
 - VIP Schemes and Deposits comparison (online)¹¹⁹

Operator	Customers %	Deposits %
1	0.30	26
2	0.01	1
3	5	58
4	2	83
5	3	35
6	1	21
7	3	36
8	0.004	1
9	3	48

- Republica estimates 58.6% of online gambling profits are from individuals who gamble and who suffer significant amounts of harm¹²⁰
 - Individuals suffering low-risk harm: 17.0%
 - Individuals suffering moderate-risk harm: 17.1%
 - Individuals suffering gambling disorder harm: 24.5%
 - Kindred's self-reported data reflects that approximately 33.6% of the company's revenue was accrued by individuals with probable gambling disorder in 2020¹²¹
- Betting shops in Great Britain are overwhelmingly in areas of deprivation by multiple deprivation
 - 19% of betting shops are in the top 10% most deprived postcodes by multiple deprivation
 - 16%, 2nd decile
 - 16%, 3rd decile
 - 13%, 4th decile
 - 10%, 5th decile
 - 8%, 6th decile

- 6%, 7th decile
- 5%, 8th decile
- 4%, 9th decile
- 2% of betting shops are in the bottom 10% of most deprived postcodes by multiple deprivation (least deprived postcodes)

- By ethnicity ⁸⁴
 - Relative difference between ethnic distribution of populations around betting shops and national averages (2011 census)
 - All betting shops
 - White: -6.7%
 - Mixed: 22.1%
 - Asian: 40.6%
 - Black: 49.8%
 - Other: 56.5%
 - Betting shops in postal districts with 10 or more betting shops
 - White: -27.7%
 - Mixed: 88.6%
 - Asian: 160.5%
 - Black: 231.5%
 - Other: 222.6%

- Gambling Industry Fines by UK Gambling Commission ^{122,123}
 - 2015: £1.88M
 - 2016: £2.01M
 - 2017: £10.74M
 - 2018: £27.20M
 - 2019: £15.77M
 - 2020: £33.93M

What the industry said?

Brigid Simmonds, Chair of the Betting and Gaming Council ¹²⁴

“But you are right in that if people start asking them for their tax return, as somebody as suggested, people will start walking away - I mean, I wouldn't share my tax return with anybody. We will be driving people to a black market. We will be doing what they've done in Sweden, where the numbers are up to about 40% of people, because they've been too tight. We've got to be balanced.

We believe the way forward is taking a risk-based approach founded on evidence. This means not considering affordability in isolation, but in the context of many other data points including frequency of bets and deposits, personal circumstances, time, products used and, crucially, changes in usual patterns of behaviour for each customer. When all these inputs are considered together, we can take an impactful approach to player protection.

The vast majority of gambling activity in Great Britain is carried out in a fair and transparent fashion.”

Simmonds utilises a strawman argument by failing to recognise that gambling companies already have access to financial data through credit check companies. Still, instead of using data analytics to protect customers, operators use data analytics for profit.

Ian Proctor, Chairman of Flutter UK and Ireland ⁹⁹

“At Flutter we believe it is important to ask ourselves the big questions and that the Government's review of the Act represents a chance for real change. Gambling has gone through a technical transformation over the last 15 years, and the rules have not kept pace.”

Proctor states that Flutter believes in self-reflection and that the review of the Act represents a chance for real change. Notably, Proctor points out that the need for gambling reform is due to a technical transformation instead of concerns for gambling-harm as a public health issue with evidence that emerged as early as 2007. Proctor also reflects a sentiment that there is a need for rules with this industry, which suggests that the industry cannot self-regulate.

Brigid Simmonds, Chair of the Betting and Gaming Council ¹²⁵

“Just as pubs, in my former incarnation, are important to high streets so are betting shops. Betting shops and their managers really care about their customers, and they want to make sure that they have the right experience but they also stay safe”

Simmonds states that betting shops are important to the high-street and compares them to pubs. The Chair of the BGC also states that betting shops and managers care about their customers and that they want to make sure that they stay safe.

Neil Goulden, Chair of the Responsible Gambling Trust and the Association of British Bookmakers ¹²⁶

[Issue of problem gambling] “dwarfed by problems with drug use, alcohol abuse and obesity”

“[Bookmakers] would not have released data or have taken the actions it continues to take in prevention of harm without my personal influence and urging,”

[urging] “the industry to take consumer product protection more seriously or face more bad press and a loss of government and consumer confidence”.

Goulden mendaciously diminishes the significance of gambling-harm relative to other public health issues such as drug use, alcohol abuse, and obesity. Scientific evidence and commentary from the World Health Organisation, directly contrasts with these statements. Goulden states that his ties and influence with the industry, combined with his role within safer gambling efforts have caused the industry to be more open and prevent harm.

Goulden reflects that he could push the industry to take matters more seriously with the warning of public relation repercussions and a loss of government and consumer confidence. Through this, it is clear that the action against gambling-harm by the industry would still be motivated by profits and factors relating to profit-making, instead of a desire to be principled in not causing harm.

Ulrik Bengtsson, CEO of William Hill ¹²⁷

“Claiming the black market doesn’t exist is like saying the Earth is flat”

“I do realise we have a huge obligation to make sure our customers play within their means. We should do a reasonable amount of affordability checks, but it can’t be to the extent where it is so intrusive that we force these people out. So it’s all about finding the right balance to keep the customers in the UK ecosystem; to keep them safe, to secure the tax base and to secure the industry”

Bengtsson implies that individuals with lived experience and other campaigners for reform deny the existence of the black market.

Spokesperson for Ladbrokes ¹²⁸

“we recognise that (name removed) has problems with his gambling and have therefore shared the details of our multi-operator self-exclusion scheme with him”

Ladbrokes reflects that their process for preventing gambling-harm in individuals with a loss of control is to send these individuals a message referring them to self-exclusion schemes.

Chapter 8: Gambling and voluntary bans

Summary

Over the past decade, the gambling industry has increasingly come under fire for quasi-safer gambling efforts, which appear to be driven by public relation efforts instead of a public-health approach. Some of the critical issues surrounding gambling-harm prevention include the design and characteristics of products, how gambling is conducted, and the volume and content of advertising.

The Betting and Gaming Council (BGC) have widely proclaimed the success of their voluntary whistle-to-whistle (W2W) ban in reducing exposure of gambling to children. The W2W ban meant that operators who are part of the BGC group voluntarily opted out of displaying gambling ads in TV commercial breaks during and immediately surrounding sports fixtures except for horse-racing. However, the W2W ban did not apply to all licensed UK operators, nor did it affect sports sponsorships or advertising through other media channels such as online.

Moreover, during the COVID-19 pandemic, the BGC responded to gambling advertising concerns by voluntarily committing to remove all TV and radio advertising for six weeks. In this period, ads were replaced with social responsibility messages, advising customers to gamble responsibly, and thus, were widely criticised as thinly veiled adverts. Like tobacco advertising, without a comprehensive and mandatory ban, advertising will simply be displaced to less regulated and less scrutinised marketing areas such as online advertising or sponsorships.

The most effective tool that individuals that gamble can utilise to regain control is self-exclusion, whereby individuals can opt-out of gambling. Self-exclusion still faces issues with awareness, accessibility, and in the past, coverage too. Notably, self-exclusion does not affect marketing. Since April 2016, the Gambling Commission has required all non-remote operators in the land-based arcade, betting, bingo, and casino sectors to participate in multi-operator self-exclusion schemes. Before multi-operator schemes were mandated for as a licensing requirement, self-exclusion was limited to individual operators and could easily be circumvented. All self-exclusion schemes, except for betting shops and online gambling, require an individual to enter a betting venue or contact the gambling industry, thus significantly reducing accessibility for those suffering from a compulsion to gamble. It should also be noted that the scheme for online gambling only became mandatory in March 2020, despite initially being announced in June 2017 and released for use in 2018.

What is known?

- Whistle to whistle ban
 - What is covered
 - TV commercial ads 5 minutes before, during and 5 minutes after sports broadcasts before 9pm ¹²⁹
 - TV = 15% of all industry marketing spend; 80% is spent online ⁵⁸
 - What is excluded
 - sponsorships
 - online casino's, lotteries, bingo, poker, and scratch cards
 - non-BGC gambling companies which are not subject to the voluntary commitment
 - ads during horse racing and greyhound racing
 - Significance of sport sponsorships
 - Frequencies of gambling reference in sports per broadcast minute ¹³⁰
(Percentage of marketing references that were commercial ad breaks)
 - Boxing: 4.70 (0%)
 - Football: 2.75 (2%)
 - Rugby Union: 0.55 (0%)
 - Tennis: 0.11 (12%)
 - Formula 1: 0.00 (0%)
 - Issues with industry interpretation of evidence ¹³¹
 - Industry claim: the "whistle to whistle" ban has slashed the amount of TV gambling ads seen by 4 to 17 year olds by 97 per cent.
 - Reality: From Aug - EOY 2018 to August - EOY 2019, BGC results show that the total number of gambling ads views across all TV channels fell by 11.3% (15, 222 million views to 13, 499 million views)
- COVID-19 TV & radio ban
 - Industry claim: BGC members to remove TV and radio gaming product advertising during covid-19 lockdown ¹³²
 - What was proposed
 - To be implemented for six weeks, by no later than Thursday 7th May 2020, and remain in force until 5th June 2020 (4 weeks)
 - Existing TV and radio advertising for casino, slots and bingo to be replaced by safer gambling messages, donated to charities or removed from broadcast where contracts permit.
 - BGC members currently account for around 50 per cent of all gambling advertising on TV and radio.
 - Criticisms ¹³³
 - BGC criticised for running thinly veiled ads as social messages which still feature the widely criticised "When the FUN stops, stop"
 - Online casino Mr Green, a brand owned by William Hill, aired a safer gambling message which ended "Enjoy award-winning online casino with Mr Green".
 - A message from SkyVegas also said "That's why I play at SkyVegas",
 - A Paddy Power message aired on Comedy Central didn't seem to contain any safer gambling advice at all.

- Multi-operator self-exclusion schemes
 - Online: GAMSTOP
 - Option 1
 1. Verify email
 2. Complete online form
 - Arcades: British Amusement Catering Trade Association (BACTA)
 - Option 1
 1. Attend local Adult Gaming Centre
 - Option 2
 1. Phone BACTA
 - Betting: MOSES part of the Betting Gaming Council
 - Option 1
 1. Phone MOSES
 2. Send a copy of photo ID and a recent photo by post or by email
 - Bingo: Bingo Association
 - Option 1
 1. Attend local bingo
 - Option 2
 1. Telephone local venue or contact them by their website
 - Option 3
 1. Contact bingo association who will provide telephone number for their venue (leads to Option 2)
 - Casino: Betting and Gaming Council
 - Option 1
 1. Attend a local casino
 - Option 2
 1. Download and print enrolment application form
 2. Fill in the form
 3. Scan or take a digital picture of the completed form
 4. Send an email to BGC with:
 - Completed enrolment application form
 - A recent photo
 - A photocopy of your driving license or passport
 - Proof of your current home address

What the industry said?

Michael Dugher, CEO of the Betting Gaming Council ¹³⁴

“And all adults who open a new gambling account are asked at the outset if they want to opt in to marketing and advertising. If they do opt in but change their mind and want to take a break or self-exclude, tools are available online to pause or stop receiving marketing.”

Dugher suggests that adults with accounts with operators have control of whether they receive gambling marketing and advertising. Although this may be true for direct marketing, there is not much that can be done to prevent those who suffer from gambling addiction from being exposed to the sheer volume of non-direct marketing online and offline.

Brigid Simmonds, Chair of the Betting Gaming Council ¹³⁵

“The success of the whistle to whistle ban – which has reduced the number of TV betting commercials seen by children during live sport pre-watershed by 97 per cent – is a perfect example of what we can achieve together.”

Simmonds uses the industry-funded research statistic of a decrease of 97% but fails to recognise that the same research partner, Enders Analysis, has reported that industry efforts have been an ‘inadequate solution to online harm’. Moreover, the overall number of gambling ads on TV fell by around 10%.

Gambling Commission ¹³⁶

“It is up to you to stick to your self-exclusion agreement, but if you try to gamble during that time the gambling business should take reasonable steps to prevent you from doing so. Once you have made a self-exclusion agreement, the gambling company must close your account and return any money in your account to you. It must also remove your name and details from any marketing databases it uses.”

According to the Gambling Commission, responsibility for not gambling still falls on customers who have identified that they have a compulsion to gambling and need help to stop them from doing so. Moreover, little consideration has been given to the fact that self-exclusion processes are inaccessible and burdensome, often requiring individuals to attend a gambling venue or contact the industry to exclude.

Peter Jackson, CEO of Flutter Entertainment ¹³⁷

“It has been suggested in recent weeks that football clubs should be banned from carrying sponsorship by betting brands. But, unlike tobacco, gambling is not inherently harmful for an individual if done responsibly and commensurately with someone’s financial means.”

Jackson suggests that gambling should not be considered in the same way as tobacco as not everyone who gambles will suffer harm. Here, Jackson fails to recognise that the magnitude of quality-of-life harm accrued from gambling on a population level is expected to be as significant as the harm accrued by tobacco use, and just like tobacco, gambling is a harmful and addictive product.

Lord Browne, House of Lords debate 23/11/17 ¹³⁸

"My first engagement with online gambling came in 2014, when I responded to the Gambling (Licensing and Advertising) Act, which was narrowly concerned with online gambling. During the debates on the Bill I argued that online problem gamblers are discriminated against because they cannot access one of the main protections for problem gamblers—self-exclusion—on anything resembling a level playing field with offline problem gamblers.

In response to this I proposed, through amendments, multi-operator self-exclusion, whereby the online problem gambler needs to self-exclude only once with the Gambling Commission or its nominated body, and all online sites with a Gambling Commission licence are required to respect the self-exclusion. On Report the Government announced that they were finally persuaded of the need for multi-operator self-exclusion but explained that they did not want to implement it on a statutory basis. I was asked to withdraw my amendment on the basis that the Government had asked the Gambling Commission to introduce multi-operator self-exclusion and it would make substantial progress towards its realisation in the next six months. Mindful of the Government's willingness to compromise, I decided to withdraw my amendment. In June this year it was finally announced that the Remote Gambling Association would run multioperator self-exclusion—or MOSES, as it is now referred to—for the Gambling Commission, and that it would be called GAMSTOP and would be up and running by the end of the year.

As we address this subject nearly four years later, I make the following points. ...

First, it is regrettable that nearly four years on from when the commitment was made we still do not have multi-operator self-exclusion up and running. We cannot afford to waste any more time"

Lord Browne reflects on the influence of industry on Government and the shortfalls of voluntary commitments to reduce or prevent gambling-harm.

Brigid Simmonds, Chair of the Betting and Gaming Council (BGC) ¹³⁹

"We will implement a ban on credit cards and indeed our members will go further to study and improve the early identification of those at risk,"

"The use of credit cards were previously used as a potential marker of harm which might lead to further intervention with customers."

When the Gambling Commission announced that it would introduce a ban on the use of credit cards from the 14th of April 2020, Simmonds stated that they would implement the ban. Simmonds also reflects that previously, signs of harmful gambling were indicated through credit cards, were used to help stratify customers such that intervention may be considered. However, it is unclear what interventions would look like and if they would be helpful or meaningful.

Chapter 9: Gambling operators as multinational corporations

Summary

The gambling industry is an international one; company headquarters are commonly based in low-tax and low-regulation countries, and online operators often have customers worldwide. The UK is not only strategically valuable as a source of income for operators, influence as an example of a liberalisation case-study, but it also boasts a unique global exposure of sports, particularly Premier League Football. Interestingly, despite the industry being critical of non-regulated brands in the UK, many UK operators often profit from unregulated markets themselves.¹⁴⁰

Before December 2014, remote operators based outside of the UK were not required to pay UK gambling duty on profits made from UK residents. After being legally mandated to hold a UK license and pay UK gambling duty, the number of remote operators licensed more than doubled in a year.

The prohibition of gambling products remains in numerous countries such as Turkey and China. Top English football clubs, which have millions of fans in these countries, are closely involved in betting companies' promotional efforts, either through prominent shirt sponsorships, pitch-side advertising, and the direct use of player endorsements. Countries in Africa, the United States, and Latin America provide growth opportunities due to increased digitalisation and legalisation. Many of the larger businesses dominating the global online gambling industry are UK-based, demonstrating the size and global influence of these operators.

What is known?

- Football sponsorships and international brands
 - Premier League Clubs with an association with a betting brand in the 20/21 season (18 out of 20) ¹⁴¹

Team	Betting Partnerships
Arsenal	Sportsbet.io (official betting partner)
Aston Villa	LT (sleeve sponsors)
Brighton	betway (official betting partner)
Burnley	LoveBet (shirt & sleeve sponsors), dafabet (other partner)
Chelsea	
Crystal Palace	W88 (shirt sponsors)
Everton	Parimatch (shirt sponsors)
Fulham	BetVictor (shirt sponsors)
Leeds United	SBOTOP (shirt sponsors), bet365 (betting partner)
Leicester United	Yabo Sports (official betting partner), Parimatch (official training kit partner), bet365 , W88 , betway (other partners)
Liverpool	Draftkings (unknown partnership) ¹⁴²
Manchester City	MarathonBet (training kit sponsors)
Manchester United	Yabo Sports (official betting partner)
Newcastle United	Fun88 (kit sponsors), MansionBet , bet365 (other partners)
Sheffield United	
Southampton	Sportsbet.io (shirt sponsors), Unibet (other partner)
Tottenham Hotspur	William Hill (official betting partner)
West Bromwich Albion	12bet (sleeve sponsors), bet365 (other partner)
West Ham United	Betway (shirt sponsors)
Wolverhampton Wanderers	ManBetX (shirt sponsors), bet365 (other partner)

- SportPesa (based in Liverpool)
 - Arsenal sent its former star, Sol Campbell, to Nairobi for children's coaching sessions with SportPesa ¹⁴³
 - Took £1.15bn in revenue from Kenya (95% of its total global income) ¹⁴⁴
 - Hull City players went to a Nairobi shanty town, where they handed out SportPesa branded wristbands and football strips to schoolchildren ¹⁴³
 - Families watch television adverts featuring Arsenal, which is sponsored by a betting firm. The slogan is "They play, you win" ¹⁴⁵
- Editec (based in London) ¹⁴³
 - Trades in Kenya as PremierBet, made pre-tax profits of £17m on a turnover of £51m in 2017, almost entirely from Africa
 - The "casino" section of PremierBet's Kenya website includes a number of cartoon-character gambling games that appeal to children. They have names such as Lucky Pirates, fronted by a friendly toucan; Spellcraft, with smiling witches; and Rainbows
 - In Cameroon, PremierBet has sponsored a school with its corporate logo on the wall
- Bet365, like others, operates in many countries where it does not have a license ¹⁴⁶
 - Important betting markets where Bet365 is available include:
 - Australia,

- Austria,
 - Argentina,
 - Bulgaria,
 - Canada,
 - China,
 - Croatia,
 - Denmark,
 - Germany,
 - Great Britain,
 - Hungary,
 - Iceland,
 - Ireland,
 - Italy,
 - Norway,
 - Russia,
 - Spain,
 - Sweden and
 - Switzerland
 - Countries that Bet365 is licensed in as of Q4 2019:
 - Australia,
 - Denmark,
 - Gibraltar,
 - Great Britain,
 - Italy,
 - Malta, and
 - Spain
- Number of licensed gambling software operators ¹⁰³
 - 2013: 96
 - 2014: 89
 - Prior to November 1st 2014, online operators were not required to have a Great British Gambling Commission licence and did not have to pay UK betting duty taxes)
 - 2015: 216
 - 2016: 241
 - 2017: 254
 - 2018: 299
 - 2019: 314
 - 2020: 321
- Number of licensed remote casino, betting, and bingo operators ¹⁰³
 - 2013: 182
 - 2014: 173
 - Prior to November 1st 2014, online operators were not required to have a Great British Gambling Commission licence and did not have to pay UK betting duty taxes)
 - 2015: 499
 - 2016: 506
 - 2017: 528
 - 2018: 608
 - 2019: 626

- 2020: 596
- A few of the UK's largest gambling businesses, where they are based, and subsidiary trading names ¹⁴⁷
 - 888 Holdings PLC: Gibraltar: (Market Cap: £1bn, Great British remote license from 1st November 2014)
 - 888 UK Limited: Gibraltar
 - 777.com, 888.co.uk, 888.com, 888.info, 888bingo.com, 888casino.com, 888ladies.com, 888poker.co.uk, 888poker.com, 888poker.net, 888pokercam.com, 888pokeruk.com, 888responsible.com, 888sport.com, 888vipcasinoclub.com, angrybingo.com, bbqbingo.com, beatlebingo.com, betyoucan.com, bingoappy.com, bingoallroom.com, bingofabulous.com, bingohearts.com, bingohollywood.co.uk, bingohollywood.com, bingostreet.com, casino-www.888poker.com, casino-www.888sport.com, celebbingo.com, citybingo.com, costabingo.com, costagames.com, daisybingo.com, dinobingo.com, fancybingo.com, frozenbingo.com, giantbingo.com, magic888casino.com, monkeybingo.com, online-casino.com, play-www.777.com, poshbingo.co.uk, redbusbingo.com, riobingo.com, seasonbingo.com, singbingo.com, snowybingo.com, sparklybingo.com, tastybingo.com, treasurebingo.com, trexbingo.com, winkbingo.com, winkbingo.net, wishbingo.com, www.888poker-promotions.com, www.bigteasebingo.com, www.bingoloft.com, www.bringobingo.com, www.crocodilebingo.com, www.deepseabingo.com, www.easterbingo.com, www.fantasticspins.com, www.farmyardbingo.com, www.farmyardbingo.info, www.jinglebingo.com, www.kingdomofbingo.com, www.realdealbingo.com, www.rewindbingo.com, www.scarybingo.com, www.skyhighslots.com, www.slotcrazy.com, www.snowybingo.com, www.spybingo.com, www.sweetshopbingo.com, www.winkslots.co.uk, www.winkslots.com, www.winkslots.net, www.winkslots.uk
 - William Hill: England (Market Cap: £3bn, Great British remote license from 1st November 2014) *purchased by Caesar's Entertainment for £3bn due to be concluded in April 2021*
 - WHG (International) Limited: Gibraltar
 - www.williamhill.com
 - Mr Green Limited: Malta
 - www.mrgreen.com
 - Bet365: England (Market Cap: £5bn, Great British remote license from 1st November 2014)
 - Hillside ENC: Malta
 - bet365.com

- Entain plc: Gibraltar (Market Cap: £9bn, Great British remote license from 1st November 2014)
 - LC International Limited: Gibraltar
 - betdaq.com, bwin.com, cheekybingo.com, coral.co.uk, foxybingo.com, foxygames.com, galabingo.com, galacasino.com, galaspins.com, gamebookers.com, ladbrokes.com, partycasino.com, partypoker.com, sportingbet.com, sportingbet.uk
- Flutter Entertainment: Ireland (Market Cap: £29bn, Great British remote license from 1st November 2014)
 - PPB Entertainment Limited: Malta
 - www.betfair.com, www.paddypower.com
 - Stars Interactive Limited: Isle of Man
 - www.betstars.uk, www.fulltilt.uk, www.pokerstars.uk, www.pokerstarscasino.uk, www.uk.fulltilt.com
 - FanDuel Limited: USA
 - www.fanduel.com
 - Bonne Terre Limited: England
 - www.skybet.com, www.skybingo.com, www.skycasino.com, www.skypoker.com, www.skyvegas.com
- Kindred Group: Gibraltar (Market Cap: £34bn, Great British remote license from 1st November 2014)
 - 32Red Limited: Gibraltar
 - 32red.com, 32redbingo.com, 32redpoker.com, 32redsport.com
 - Platinum Gaming Limited: England
 - touch.unibt.co.uk, www.unibet.co.uk
- Taxes paid
 - Kindred Group
 - 32 Red, which is based in Gibraltar, paid just £812,000 in corporation tax in the ten years to 2016 – an effective tax rate of 3 per cent ¹⁴⁸
 - Entain plc (formerly GVC)
 - 2017 ¹⁴⁹
 - UK
 - corporation tax: £14m,
 - business rate & other taxes: £34m
 - betting duties: £396m
 - employer national insurance: £37m
 - irrecoverable VAT: £72m
 - Foreign
 - taxes: £244m
 - 2019 ¹⁵⁰
 - UK
 - corporation tax: £-17m
 - business rate and other taxes: £29m

- betting duties: £393m
- employer national insurance: £34m
- irrecoverable VAT: £68M
- Foreign
 - taxes: £420m

What the industry said?

William Hill PLC Annual Report 2019 ¹⁵¹

"The US remains our most significant near-term opportunity. As we continue to hold leading positions in existing states, and work to launch in newly accessible states, the complexity of our US business"

William Hill identifies to shareholders that the US represents the source of the most significant growth in the near-term due to online sports betting's legalisation.

Kindred ¹⁴⁸

"Kindred Group and all our brands – including 32Red – pays all taxes required in every market we operate including the UK."

Kindred states that they pay all their taxes required but omits the concern that UK corporation tax is being avoided and instead corporation tax is being paid in low tax and low regulation countries.

GVC (Entain Group) ¹⁴⁸

"GVC is a global business. Nevertheless, group companies paid more than £2.5billion of UK taxes from 2015 - 2019, making it one of the top 20 largest taxpayers in the country."

GVC had conveniently reported figures from 2015 when remote operators had to register for a license and could no longer avoid UK betting duties and UK corporation tax. Businesses like GVC still benefit from their offshore bases by avoiding UK corporation tax in place of lower rates in Gibraltar.

Bet365 ¹⁵²

"A geographical analysis of turnover has not been given, as in the opinion of the directors, such a disclosure would be severely prejudicial to the interests of the group"

Bet365 is primarily owned by the Coates Family (93%) and a minority stake owned by Will Roseff (7%). A lack of investors means that Bet365 has no need to be transparent about risks and opportunities, and thus, it refuses to identify the significance of its revenues from 'black-market' regions.

Michael Dugher ¹²

"Unfortunately, in the same way that it is true that regulated betting employs 100,000 people and pays around £3 billion in tax, none of this evidence suits the anti-gambling lobby."

Dugher refers to the levels of employment and tax revenue provided by regulated betting. Ironically, Dugher is keen to avoid discussion of the harms caused by gambling to society and the scale of tax avoidance on the part of gambling companies

Sam Chibambo, Premier Bet (Editec) Sales Manager ¹⁵³

“We are here to change people’s lives. With little money, one wins huge amount of money. I can only encourage people to visit our shops and our agents to place their bets. They can also bet online.”

A sales manager for a UK-headquartered operator with customers in Africa encourages the idea of gambling to achieve a better life.

Fady Younes, Malawi Marketing Manager of Premier Bet (Editec) ¹⁴³

“We hope that everyone who places bets will win up to 20m [kwacha — about £21,000].”

A marketing manager for another UK-headquartered operator with customers in Africa, disingenuously implies that the operator hopes that everyone will win a small fortune.

Mor Weizer, CEO of Playtech ¹⁵⁴

“Being too focused on regulated markets actually comes with a lot of risks, not just rewards.”

There is a balance companies, bookmakers and operators – definitely the pan-European ones – need to maintain between unregulated and regulated income streams.

It is extremely important to enjoy the benefits of operating in certain unregulated markets, generating income that can then be deployed in the same markets as they become regulated, and in other markets where online gaming is already regulated.”

Weizer highlights the strategic importance of unregulated markets', recommending that operators involve themselves as part of the black-market.

GVC ¹⁵⁵

“Unregulated gambling markets in Asia and North America make up a big portion of the global online gaming market. About 4% of the company's revenue currently comes from these markets, and GVC said by the end of the year the number would be cut to 1%.”

Interestingly, 4% of GVC's revenue in 2020 was accrued from black market gambling in Asia and North America. The 4% is relatively higher than the 1.2% valuation of the black market in the UK, which is so often proclaimed as the bogeyman of gambling in Britain.

Shay Segev, CEO of GVC ¹⁵⁶

“making great progress towards being the leading operator in the US”.

Segev reports on the growth opportunity of the US and customer acquisition efforts in a recently legalised market.

Philip Bowcock, CEO of William Hill ¹⁵⁷

“Just one year on since PASPA [Federal Ban on Sports Betting] was overturned William Hill has doubled the sports wagering it handles in the US, seen record performances at the Super Bowl and March Madness, is live in all seven states to have allowed sports betting and expects to enter

further states soon, with Indiana and Iowa the most recent states to pass bills to legalise sports betting.”

Bowcock reports on the success of expansion to the US as sports betting becomes legalised.

Chapter 10: Gambling and crime

Summary

The Gambling Act 2005 sets out three licensing objectives⁴³

preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

ensuring that gambling is conducted in a fair and open way

protecting children and other vulnerable persons from being harmed or exploited by gambling.

Gambling has been linked to crimes of:

- opportunity such as theft,
- duress such as drug trafficking to pay debt, &
- negligence such as leaving children unsupervised

As well as crimes to facilitate gambling, gambling can conversely be used to facilitate crime by offering a means for money laundering. Moreover, crimes of abuse, intimidation, and violence can be related to gambling and may be induced by the psychologically taxing effects of harms on individuals that gamble. Familicide, which is at the extreme end of family violence harms, has seldom been measured or reported in research. Moreover, as well as potentially being victims of gambling-related crime, affected others have also been reported to commit crimes such as petty theft and illegal drug use.

Studies worldwide have identified that prison populations contain disproportionate numbers of individuals who have suffered gambling harm. Furthermore, a significant percentage of the crime committed by individuals suffering from gambling disorder is directly gambling-related.

NICE guidelines on "Mental health of adults in contact with the criminal justice" at first-stage health assessment include alcohol and substance misuse but omits gambling.

The industry downplays the significance of gambling-related crime in Great Britain, primarily by suggesting that Great Britain's situation is somehow better than in other countries and by deflecting blame for crime to black market operators.

What is known?

- Agree that gambling in this country is associated with criminal activity ¹¹⁸
 - 2010: 37%
 - 2011: 37%
 - 2012: 40%
 - 2013: 40%
 - 2014: 41%
 - 2015: 40%
 - 2016: 39%
 - 2017: 41%
 - 2018: 38%
 - 2019: 43%

- Prevalence of gambling-related crime in individuals that gamble
 - A review found that approximately 50% of the crime committed by individuals with gambling disorder was gambling-related; this is in line with studies (presented in the same review) that reflect between 4%-9% of all crime is gambling-related crime committed by individuals with gambling disorder. ¹⁵⁸
 - A study in Hong Kong reported the prevalence of suicidal ideation and familicidal-suicidal ideation among individuals presenting to gambling disorder treatments services of 20.0% and 0.6%, respectively ¹⁵⁹
 - In 2010, 1 in 500 or 0.2% of adults in Great Britain reported committing crimes to finance their own gambling in the past year such as forgery, fraud, theft, and embezzlement ²⁰ (1 in 1000 or 0.1% of adults in 2007) ²²

- Prevalence of gambling-related crime in affected others ³
 - 18% reported not fully attending to needs of children
 - 7% reported engaging in petty theft or dishonesty as a consequence of their family member's gambling
 - 5% reported leaving children unsupervised
 - 4% reported taking money or items from friends or family without asking first
 - 3% reported feeling compelled or forced to commit crime or steal to fund family member's gambling or pay debts

- Prevalence of gambling-harm among prison populations
 - Multi-centre studies of gambling harm in Great Britain's prisons have reported significantly elevated rates of prevalence compared to the general population
 - In a 2017 study, 34.3% of those surveyed in English and Scottish prisons suffered gambling harm due to their gambling in the past year ¹⁶⁰
 - 11.2% suffered low-risk gambling harm
 - 11.0% suffered moderate-risk gambling harm
 - 12.1% suffered gambling disorder harm
 - A study in two English prisons (one male and one female) reported that 13.4% of males and 7.2% of females admitted to committing a crime to finance gambling or pay off debts ¹⁶¹

- Estimated cost of crime

- According to the IPPR, between £40m (0.9% of the overall spend on prisons) and £190m (4.3%) are spent on gambling disorder related incarcerations in Great Britain ¹⁶²
- Czech Republic (population: 10.7m) ⁸²
 - Total: £61.1m - £69.6m
 - Police (4.7 – 6.5% of all major cases, and 0.6 – 0.8% of all minor cases were related to gambling): £22.3m to £30.8m
 - Courts: £1.8m
 - Prisons (15.8% of prisoners were in jail because of crimes related to gambling): £37.0m
- Sweden (population: 10.2m) ⁸¹
 - Total: £10.1m
 - Police: £7.4m
 - Courts: £0.9m
 - Prisons: £1.8m
- Location of betting shops and deprivation by crime decile
 - Betting shops in Great Britain are overwhelmingly in areas of deprivation by crime ¹⁶³
 - 29% of betting shops are in the top 10% most deprived postcodes by crime
 - 16%, 2nd decile
 - 13%, 3rd decile
 - 11%, 4th decile
 - 10%, 5th decile
 - 8%, 6th decile
 - 6%, 7th decile
 - 4%, 8th decile
 - 2%, 9th decile
 - 1% of betting shops are in the bottom 10% of most deprived postcodes by crime (least deprived postcodes)

What the industry said?

The Betting and Gaming Council ¹⁶

“By international standards, Great Britain has a well-regulated and well-functioning gambling market with high levels of consumer choice and low levels of crime and problem gambling.”

Firstly, the BGC argues in relation to international standards to deflect responsibility, despite there being no reliable evidence to support this claim. Great Britain has low levels of gambling-related crime, demonstrating the industry’s refusal to accept evidence and scientific consensus.

“On the basis of data available, licensed gambling in Great Britain is almost entirely free from criminal involvement from an operational or ownership perspective.”

The following statement offers a favourable view that, crucially, focuses on criminal involvement on owners and operators. In doing so, the BGC omits consideration of crime committed to fund gambling or gambling used to facilitate crime such as money laundering.

“...the percentage of respondents who bet more than they could afford has fallen. The same is true of those borrowing money, selling items or committing a crime in order to gamble.”

The last statement contrasts with the last series of gold-standard gambling prevalence studies, which reflect an increase in gambling-harm and gambling-related crime.

Denise Coates, Joint-CEO of Bet365 ¹⁶⁴

“[Bet365] recognises its responsibility to minimise gambling-related harm and to keep crime out of gambling. The group is committed to developing an evidence-based approach to responsible gambling. To this end, the group continues to work with research partners on a number of projects to improve its methods of identifying harmful play and deliver more effective harm-minimisation interventions.”

Coates, CEO of Bet365, acknowledges gambling-related harm and the risks of crime associated with gambling. While donating millions to the Denise Coates Foundation, which now has a burgeoning balance sheet of over £300m funds and yet no donations had been made to either gambling or addiction charities. ¹⁶⁵

Ulrik Bengtsson, CEO of William Hill ¹⁶⁶

[The black market] is a problem we must keep pace with and confront. Not doing so, risks an increase in crime and problem gambling.

Bengtsson conflates crime with the black-market industry despite evidence reflecting significant issues with gambling-related crime in Great Britain despite the unregulated market making up approximately 1.2% of total stakes.

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Appendix

Taxonomy of harm experienced by people who gamble

2

	General	Crisis	Legacy
Financial Harm	<ul style="list-style-type: none"> • Reduction or loss of capacity to purchase luxury items such as holidays, electronics • Reduction or loss of discretionary spending such as non-gambling related entertainment or other family members' activities (ie. children's sports) • Erosion of savings • Activities to manage short term cash-flow issues: <ul style="list-style-type: none"> o Additional employment or other forms of income generation o Accessing more credit o Use of credit cards (kite flying) o Selling or pawning items o Pay day loans o Non-payment or juggling of large bills such as utilities or rates • Cost of replacing items sold or pawned as part of short term cash strategies • Reduction or loss of non-immediate consequence expenditure <ul style="list-style-type: none"> o Insurance (health, home, car, income protection, business) o Repairs or maintenance costs (home, car, business) o Health promotion activities (check-ups, long term medications, allied health support) o Household items • Reduction or loss of expenditure on items of immediate consequence: <ul style="list-style-type: none"> o Children's expenses (education) o Medication or health care 	<ul style="list-style-type: none"> • Loss of sources of additional funds (ie no further credit available) • Loss of capacity to meet requirements of essential needs (food) • Loss of normal accommodation requiring temporary accommodation or resulting in homelessness • Loss of major assets (car, home, business) • Bankruptcy 	<ul style="list-style-type: none"> • Reliant on welfare • Restrictions due to bankruptcy or credit rating • Ongoing financial hardship • "Forced" cohabitation or involvement in unhealthy relationship due to financial constraint • Further financial harm from attempts to manage debt (ie. Non-reputable finance providers for debt consolidation) • Ongoing issues relating to financial security, poverty, or financial disadvantage. • Higher costs associated with poor credit rating including premium cost of pay as you go services or increased security bonds.

	General	Crisis	Legacy
	<ul style="list-style-type: none"> o Clothing o Food (including use of food parcel) o Housing or accommodation o Needing assistance with bill payments from welfare organisations or inability to pay bills (eg utilities) o Transport costs (petrol, fares) 		
Relationship Disruption, Conflict or Breakdown	<ul style="list-style-type: none"> • Dishonest communication within relationships with spouse, partner, children, family, friends or community • Unreliable or unavailable to spouse, partner, children, family, friends or community • Reduced amount of time spent with spouse, partner, children, family, friends or community • Reduced quality of time spent with spouse, partner, children, family, friends or community • Disengagement or withdrawal from relationship responsibilities. • Increased levels of neglect of relationships • Pervasive neglect or disengagement from relationships • Reduced engagement in family or social events, • Tension with spouse, partner, children, family, friends or community • Minor or occasional conflict due to increased involvement in gambling or suspicion of increased involvement with gambling • Serious or regular conflict due to increased involvement in gambling or suspicion of increased involvement with gambling • Major or constant conflict due to increased involvement in gambling or suspicion of increased involvement with gambling • Loss of trust from relationship with spouse, partner, children, family, friends or community • “Punishment” by spouse, partner, children, family, friends or community • Episodic distortion of relationship roles (infantilising the 	<ul style="list-style-type: none"> • Threat of separation or rejection from relationship with spouse, partner, children, family, friends or community • Actual separation or rejection from relationship with spouse, partner, children, family, friends or community • Social isolation • Loss of relationship (temporary or permanent) with spouse, partner, children, family, friends or community • Distortion of relationship roles (infantilising the person gambling, others including children having to take parental type role) • Incidence or escalation of family violence or intimate partner violence 	<ul style="list-style-type: none"> • Social isolation due to ongoing estrangement from relationships with spouse, partner, children, family, friends or community • Vulnerability to problematic gambling relapse due to isolation or relationship breakdown • Inability or reluctance to participate in social functions at gambling venues • Ongoing “punishment” or resentment from spouse, partner, children, family, friends or community • Relationship rebuilding or reconciliation • Ongoing involvement of family court in parenting or co-parenting • Long term damage or estrangement from relationship/s with spouse, partner, children, family, friends or community • Ongoing distortion of relationship roles (infantilising the person gambling, others including children having to take parental type role) • Loss of psychological development through lack of appropriate social interaction • Incidence or escalation of family violence or intimate partner violence

	General	Crisis	Legacy
	<p>person gambling, others including children having to take parental type role)</p> <ul style="list-style-type: none"> • Incidence or escalation of family violence or intimate partner violence 		
Emotional or Psychological Distress	<ul style="list-style-type: none"> • Emotional and psychological distress caused by living outside of your value system • Experience of distorted cognitions or erroneous beliefs • Emotional or psychological distress of hiding gambling from others (including lying and creating alibis for lost time and money) • Reduced feelings of self-worth and pride • Increased feelings of shame • Increased feelings of inadequacy or personal failing because of inability to control gambling to recreational levels • Perceptions of being stigmatised • Emotional or psychological distress of inability to control gambling • Increased feelings of insecurity and vulnerability • Emotional or psychological distress caused by other harms • Emotional or psychological distress due to harm caused to others (guilt) • Loss of “face” or reputation due to impact of other harms • Desperation from not being able to recoup losses. • Emotional or psychological distress of not wanting to accept problems with gambling • Loss of sense of future or ability to get ahead • Increasing feelings of powerlessness • Fear and distress from follow up and harassment by creditors (legal and illegal) 	<ul style="list-style-type: none"> • Extreme emotional or psychological distress in relation to other harms • Extreme emotional or psychological distress due to harm caused to others • Extreme emotional or psychological distress caused by living outside of your value system • Complete loss of feelings of self-worth and pride • Extreme shame • Extreme sense of hopelessness and powerlessness • Suicidal ideation • Loss of “face” or reputation (stigma) if problem with gambling becomes publicly known • Shame from utilising responsible gambling measures such as exclusion or seeking treatment. • Extreme fear and distress from follow up and harassment by creditors (legal and illegal) 	<ul style="list-style-type: none"> • Experienced, perceived and internal stigma • Ongoing guilt and shame • Emotional and psychological impacts of managing recovery or harm minimisation strategies including constant vigilance and behavioural adaptation • Ongoing feelings of insecurity and vulnerability • Ongoing emotional and psychological distress in relation to other harms • Ongoing emotional or psychological distress due to harm caused to others • Ongoing emotional or psychological distress caused by having lived outside of your value system • Ongoing vulnerability to suicidal behaviours

	General	Crisis	Legacy
Decrements to Health	<ul style="list-style-type: none"> • Increased sedentary behaviour during time spent gambling • Biological manifestation of emotional and psychological distress eg. increased blood pressure, loss of sleep • Reduced levels of self-care: <ul style="list-style-type: none"> o nutrition o hygiene o sufficient sleep o compliance with medical care o physical activity o reduced quality of living circumstances (ie. cannot afford heating) • Incidence of disease or injury due to reduced levels of self care • Increased risk due to gateway effect, interaction with, or exacerbation of other health risk factors (drinking, smoking, illegal substances) • Increased risk due to gateway to, interaction with, or exacerbation of comorbidities (depression, anxiety, biophysical chronic disease) • Increased experience of family violence due to involvement in gambling • Incidence of self-harm • Minor health ailments (headache migraine) relating to focussing on a screen for long periods of time with particular gambling products 	<ul style="list-style-type: none"> • Physical impacts of living rough due to homelessness, including increased risk of disease, violence and impact of poor living conditions • Experience of violence due to involvement in gambling • Medical emergency (including mortality) due to onset, exacerbation, or failure to diagnose condition due to gambling • Serious self-harm • Attempted (or completed) suicide 	<ul style="list-style-type: none"> • Ongoing disability or decrement to health through attempted suicide or other forms of self-harm • Ongoing increased risk of disease or decrement to health due to legacy effects of risk factors or poor self-care • Ongoing disability or decrement to health due to other medical conditions exacerbated or advanced due to involvement with gambling.
Cultural Harm	<ul style="list-style-type: none"> • Reduced engagement in cultural rituals • Culturally based shame in relation to cultural roles and expectations • Reduction of contribution to community and cultural practices of the community • Reduction of cultural practices • Reduced connection to cultural community • Harm to individual through reduced connection to 	<ul style="list-style-type: none"> • Extreme cultural shame in relation to culturally based roles and expectations • Loss of ability to contribute to community • Impact (loss) on cultural practices • Damaged or lost connection to community and culture 	<ul style="list-style-type: none"> • Ongoing cultural shame in relation to roles and expectations • Ongoing reduction or loss of contribution to community • Ongoing reduction or loss of cultural practices • Ongoing loss of connection to community

	General	Crisis	Legacy
	community and culture in terms of increased social exclusion or isolation	<ul style="list-style-type: none"> • Harm to individual through reduced or lost connection to community 	<ul style="list-style-type: none"> • Ongoing harm to individual through reduced connection to community
Reduced Performance at Work or Study	<ul style="list-style-type: none"> • Reduced performance due to tiredness or distraction • Increased absenteeism due to time spent actually gambling, tiredness, ill health or lack of transport due to gambling • Workplace or educational institution consequences of use of work or educational institution resources for gambling activity • Reduced availability to contribute to the community through volunteer work 	<ul style="list-style-type: none"> • Loss of job due to theft or fraud involving employment or educational institution • Loss of job, suspension or exclusion from educational institution due to poor performance • Exacerbation or contribution to other harms due to job loss (including loss of wage) • Rejection from volunteer work 	<ul style="list-style-type: none"> • Reduced opportunity for employment or enrolment due to past poor performance or criminal activity • Ongoing impact in participation in volunteer work (linked to reputation and restriction of activities)
Criminal Activity	<ul style="list-style-type: none"> • Vulnerability to illegal activities that can provide fast access to funds • Engagement in crimes of negligence - acts such as child neglect (leaving children unsupervised) • Engagement in crimes of opportunity - petty theft including from family members • Engagement in crimes of opportunity - property crimes for funds, illicit lending, fraudulent efforts to attain funds • Engagement in crimes of duress - relating to repaying debt such as drug trafficking and prostitution 	<ul style="list-style-type: none"> • Arrest and/or conviction of criminal activity of opportunity • Arrest and/or conviction of criminal activity of duress • Arrest and / or conviction of criminal activity of negligence 	<ul style="list-style-type: none"> • Impact of criminal record on future employment opportunities, voluntary and community opportunities, travel restrictions • Disruption to relationships of custodial sentence • Ongoing impact on spouse, partner, child, family and friends due to impact of criminal record or custodial sentence through other mechanisms • Trans-generational impact of criminal record or custodial sentence • Shame and stigma of criminal conviction or involvement in criminal activity
Lifecourse and Intergenerational Harms <ul style="list-style-type: none"> • Generational loss relating to financial security or stages of financial achievement (ongoing impact caused by inability to secure or loss of major asset, superannuation) • Loss of lifecourse events such as engagement/marriage/having children (generational loss) • Loss of primary relationships and social connection (including parents/children/community) • Having to move towns/states due to impact of gambling or other harms • Homelessness 			

	General	Crisis	Legacy
<ul style="list-style-type: none">• Change to career due to impact of gambling or other harms• Incarceration due to gambling			

Taxonomy of harm experienced by affected others

2

	General	Crisis	Legacy
Financial Harm	<ul style="list-style-type: none"> • Additional costs due to lack of capacity of person who gambles to meet their costs or joint costs (minor to major items) • Reduction or loss of capacity to purchase luxury items such as holidays, electronics • Reduction or loss of discretionary spending such as non-gambling related entertainment or other family members' activities (ie. children's sports) • Erosion of savings • Activities to manage short term cash-flow issues: <ul style="list-style-type: none"> o Additional employment or other forms of income generation o Accessing more credit o Use of credit cards (kite flying) o Selling or pawning items o Pay day loans o Non-payment or juggling of large bills such as utilities or rates • Cost of replacing items sold or pawned as part of short term cash strategies • Reduction or loss of non-immediate consequence expenditure <ul style="list-style-type: none"> o Insurance (health, home, car, income protection, business) o Repairs or maintenance costs (home, car, business) o Health promotion activities (check-ups, long term medications, allied health support) o Household items • Reduction or loss of expenditure on items of immediate consequence: <ul style="list-style-type: none"> o Children's expenses (education) o Medication or health care o Clothing o Food (including use of food parcel) o Housing or accommodation o Needing assistance with bill payments from welfare organisations or inability to pay bills (eg utilities) o Transport costs (petrol, fares) 	<ul style="list-style-type: none"> • Loss of capacity to meet requirements of essential needs (food) • Loss of normal accommodation requiring temporary accommodation or resulting in homelessness • Loss of major assets (car, home, business) • Bankruptcy 	<ul style="list-style-type: none"> • Reliant on welfare • Restrictions due to bankruptcy or credit rating • Ongoing financial hardship • "Forced" cohabitation or involvement in unhealthy relationship due to financial constraint • Further financial harm from attempts to manage debt (ie. Non-reputable finance providers for debt consolidation) • Ongoing issues relating to financial security, poverty, or financial disadvantage. • Higher costs associated with poor credit rating including premium cost of pay as you go services or increased security bonds.

	General	Crisis	Legacy
Relationship Disruption, Conflict or Breakdown	<ul style="list-style-type: none"> • Dishonest communication within relationship from person who gambles to affected other • Person who gambles is unreliable or unavailable to affected other • Reduced amount of time spent with person who gambles • Reduced quality of time spent with person who gambles • Feelings of unequal contribution to relationship with person who gambles • Disengagement or withdrawal from relationship responsibilities by person who gambles • Increased levels of neglect of relationship by person who gambles • Reduced engagement in family or social events with person who gambles, • Tension in relationship with person who gambles • Tension in other relationships due to emotional and/or material demands of trying to manage relationship with person who gambles • Minor or occasional conflict due to increased involvement in gambling or suspicion of increased involvement with gambling by person who gambles • Serious or regular conflict due to increased involvement in gambling or suspicion of increased involvement with gambling by person who gambles • Major or constant conflict due to increased involvement in gambling or suspicion of increased involvement with gambling by person who gambles • Loss of trust from relationship with person who gambles • Episodic distortion of relationship roles (infantilising the person gambling, others including children having to take parental type role) • Significant disruption to other relationships due to emotional and/or material demands of trying to manage relationship with person who gambles • Episodic distortion of relationship between affected others (ie. Spouse of person who gambles using children of relationship as confidant) 	<ul style="list-style-type: none"> • Contemplation of separation or rejection from relationship with person who gambles • Actual separation or rejection from relationship with person who gambles and potentially related others • Loss of other relationships due to emotional and/or material demands of trying to manage or remaining in relationship with person who gambles • Social isolation due to feelings of shame or being stigmatised • Loss of relationship (temporary or permanent) with spouse, partner, children, family, friends or community • Distortion of relationship roles (infantilising the person gambling, others including children having to take parental type role) • Incidence or escalation of family violence or intimate partner violence 	<ul style="list-style-type: none"> • Feelings of guilt over ending relationship with person who gambles and potential impact • Social isolation due to ongoing estrangement from other relationships • Vulnerability to continuing in ongoing unhealthy relationship with person who gambles (episodic reconciliations) for reasons of guilt or inadequacy • Inability or reluctance to participate in social functions at gambling venues to protect person who gambles • Ongoing resentment and shame within relationship with person who gambles • Relationship rebuilding or reconciliation • Ongoing involvement of family court in parenting or co-parenting • Long term damage or estrangement from person who gambles and potentially related others • Ongoing distortion of relationship roles (infantilising the person gambling, others including children having to take parental type role or confidant role) • Inability to form trusting relationships with others or hypervigilance within relationships • Incidence or escalation of family violence or intimate partner violence

	General	Crisis	Legacy
	<ul style="list-style-type: none"> • Incidence or escalation of family violence or intimate partner violence 		
Emotional or Psychological Distress	<ul style="list-style-type: none"> • Feelings of frustration over person who gamble's behaviour • Anxiety when person who gambles does not respond to normal communication methods • Emotional and psychological distress caused by difference to own value system • Emotional or psychological distress of feelings of suspicion or being lied to • Reduced feelings of self-worth • Feelings of shame or guilt • Loss of feeling safe and secure in life • Increased feelings of inadequacy or personal failing because of inability to help person who gambles • Emotional or psychological distress from being manipulated or threatened (threats to the affected other or threats of self harm by person who gambles) • Perceptions of being stigmatised • Anxiety when person who gambles disappears for extended periods of time without contact (days) • Emotional or psychological distress of being blamed for other person's gambling • Emotional or psychological distress at people arguing because of gambling behaviours (children) • Increased feelings of insecurity and vulnerability • Emotional or psychological distress caused by other harms • Loss of "face" or reputation due to impact of other harms • Loss of sense of future or ability to get ahead • Increasing feelings of powerlessness • Guilt over harms to other affected others • Increased feelings of anger and frustration • Fear and distress from follow up and harassment by creditors (legal and illegal) • Feelings of guilt if affected other was the person who introduced the person who gambles to gambling 	<ul style="list-style-type: none"> • Extreme emotional or psychological distress in relation to other harms • Extreme emotional or psychological distress due to harm caused to other affected others • Extreme emotional or psychological distress caused by living in constant feelings of insecurity and vulnerability • Complete loss of feelings of self-worth and pride • Extreme shame • Extreme sense of hopelessness and powerlessness • Emotional or psychological distress of dealing with person who gambles problems including their distress, self harm, suicidal ideation or completion. • Loss of "face" or reputation (stigma) if person who gambles' problem with gambling becomes publicly known • Emotional or psychological distress of supporting and/or assisting person who gambles to seek treatment • Extreme fear and distress from follow up and harassment by creditors (legal and illegal) • Grief and/or resentment for loss of security, lifestyle, relationship • Feelings of rejection that gambling is chosen over them 	<ul style="list-style-type: none"> • Experienced and perceived stigma • Ongoing guilt and shame • Emotional and psychological impacts of supporting recovery or harm minimisation strategies including constant vigilance and behavioural adaptation • Ongoing feelings of insecurity and vulnerability • Ongoing emotional and psychological distress in relation to other harms • Ongoing emotional or psychological distress due to harm caused to other affected others • Ongoing emotional or psychological distress of vigilance to mental health status of person who gambles including distress, self harm, suicidal ideation or completion • Ongoing feelings of grief, resentment and anger

	General	Crisis	Legacy
	<ul style="list-style-type: none"> • Increased risk to emotional or psychological wellbeing of affected other in the care of the person who gambles due to their distraction or tiredness 		
Decrements to Health	<ul style="list-style-type: none"> • Physical impacts of other harms • Biological manifestation of emotional and psychological distress eg. Feeling tired, increased blood pressure, loss of sleep, migraine, nausea, diarrhoea • Reduced levels of self-care: <ul style="list-style-type: none"> o nutrition o hygiene o sufficient sleep o compliance with medical care o physical activity o reduced quality of living circumstances (ie cannot afford heating) • Incidence of disease or injury due to reduced levels of self care • Increased risk due to gateway effect, interaction with, or exacerbation of other health risk factors (drinking, smoking, illegal substances) • Increased risk due to gateway to, interaction with, or exacerbation of morbidities (depression, anxiety, biophysical chronic disease) • Increased experience of family violence due to involvement with person who gambles • Incidence of self-harm • Increased risk to physical wellbeing of affected other in the care of the person who gambles due to their distraction or tiredness 	<ul style="list-style-type: none"> • Onset of health condition due to exacerbation of risk factors or continued stress from other harms • Physical impacts of living rough due to homelessness, including increased risk of disease, violence and impact of poor living conditions • Experience of violence due to involvement with person who gambles • Medical emergency (including mortality) due to onset, exacerbation, or failure to diagnose condition due to impacts of person who gamble's behaviours • Serious self-harm • Attempted (or completed) suicide 	<ul style="list-style-type: none"> • Ongoing disability or decrement to health through attempted suicide or other forms of self-harm • Ongoing increased risk of disease or decrement to health due to legacy effects of risk factors or poor self-care • Ongoing disability or decrement to health due to other medical conditions exacerbated or advanced due to involvement with person who gambles
Cultural Harm	<ul style="list-style-type: none"> • Reduced engagement in cultural rituals • Culturally based shame in relation to cultural roles and expectations • Reduction of contribution to community and cultural practices of the community • Reduction of cultural practices • Reduced connection to cultural community 	<ul style="list-style-type: none"> • Extreme cultural shame in relation to culturally based roles and expectations • Loss of contribution to community • Impact (loss) on cultural practices • Damaged or lost connection to community and culture • Damage to individual through 	<ul style="list-style-type: none"> • Ongoing (including intergenerational) cultural shame in relation to culturally based roles and expectations • Ongoing reduction or loss of contribution to community • Ongoing reduction or loss of cultural practices • Ongoing loss of connection to

	General	Crisis	Legacy
	<ul style="list-style-type: none"> • Harm to individual through reduced connection to community and culture in terms of increased social exclusion or isolation 	<ul style="list-style-type: none"> reduced or lost connection to community 	<ul style="list-style-type: none"> community • Ongoing (intergenerational) damage to individual through reduced connection to community
Reduced Performance at Work or Study	<ul style="list-style-type: none"> • Reduced performance due to tiredness or distraction • Increased absenteeism due to time spent supporting or addressing problems of person who gambles • Reduced availability to contribute to the community through volunteer work 	<ul style="list-style-type: none"> • Theft or fraud involving employment or educational institution • Loss of job, suspension or exclusion from educational institution • Exacerbation or contribution to other harms due to job loss (including loss of wage) • Impact on others of loss of job or education 	<ul style="list-style-type: none"> • Reduced opportunity for employment or enrolment due to past poor performance or criminal activity • Trans-generational impact of loss of income and reduced future ability to participate in employment • Ongoing impact in participation in volunteer work (linked to reputation and restriction of activities)
Criminal Activity	<ul style="list-style-type: none"> • Victim of crime from person who gambles – petty theft of items or small amounts of cash. • Vulnerability to illegal activities that can provide fast access to funds • Engagement in crimes of opportunity - petty theft including from family members • Engagement in crimes of opportunity - property crimes for funds, illicit lending, fraudulent efforts to attain funds • Engagement in crimes of duress - relating to repaying debt such as drug trafficking and prostitution 	<ul style="list-style-type: none"> • Victim of crime from person who gambles – fraud • Victim of crime from person who gambles – significant theft of money or items • Victim of crime from involvement of person who gambles in illegal activities • Arrest and/or conviction of criminal activity of opportunity • Arrest and/or conviction of criminal activity of duress • Arrest and/or conviction of criminal activity of negligence 	<ul style="list-style-type: none"> • Ongoing impacts from being victim of crime • Impact of criminal record on future employment opportunities, voluntary and community opportunities, travel restrictions • Disruption to relationships of custodial sentence • Ongoing impact on spouse, partner, child, family and friends due to impact of criminal record or custodial sentence through other mechanisms • Trans-generational impact of criminal record or custodial sentence • Shame and stigma of criminal conviction or involvement in criminal activity
Lifecourse and Intergenerational Harms			
<ul style="list-style-type: none"> • Delay in life course events and matters of financial security and achievement 			

	General	Crisis	Legacy
	<ul style="list-style-type: none">• Generational loss relating to financial security or financial achievement (ongoing impact caused by loss of major asset, superannuation)• Loss of lifecourse events such as engagement/marriage/having children (generational loss)• Loss of primary relationships and social connection (including parents/children/community)• Homelessness• Having to move towns / states due to impact of person who gambles or other harms• Incarceration		

Taxonomy of harms experienced by communities

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Financial Harm	Relationship Disruption, Conflict or Breakdown	Emotional or Psychological Distress	Decrements to Health
<ul style="list-style-type: none"> • Increased reliance on welfare both community and government provided. • Increased levels of debt and bankruptcy (administration of these) • Broader impact to the community of business closures. • Perpetuation of poverty and welfare reliance from a generational perspective. • Redistribution of community funds through biased processes. • Impact on fundraising ventures for community organisations. 	<ul style="list-style-type: none"> • Costs to the family law courts, and associated organisations. • Costs of caring for dependents no longer supported • Damage to social cohesion and social capital through isolation and exclusion. 	<ul style="list-style-type: none"> • Decline in social and cultural capital. • Costs associated with provision of services to assist people with emotional and psychological harms • Burden of disease from related psychological harms • Harms to venue workers. 	<ul style="list-style-type: none"> • Increased costs to the health system (direct and indirect) both in terms of treatment for gambling and costs associated with other medical conditions caused or exacerbated by gambling.
Cultural Harm	Reduced Performance at Work or Study	Criminal Activity	Lifecourse or Intergenerational Harms
<ul style="list-style-type: none"> • Community must make up for lost contributions (roles, time, finance) due to disconnection of members • Use of cultural norms and practices to promote gambling (disrespectful to the culture) • Exacerbation of hopelessness through negative narrative associating culture with gambling problems • Disconnection of youth (generational loss) 	<ul style="list-style-type: none"> • Cost of job turnover, absenteeism. • Impact on employment at other businesses affected by gambling harm (ie. where a business closes and businesses that interacted with it lose sales). • Decreased participation in volunteering and other community activities. 	<ul style="list-style-type: none"> • Direct costs of criminal activity in terms of the investigation of crime, costs to the judicial system, incarceration, probation and parole. • Cost to victims of crime both financial and emotional. 	<ul style="list-style-type: none"> • Normalisation of gambling and gambling related harm • Cumulative impact of generational losses • Transgenerational loss creating dependence

Taxonomy for gambling-related crime

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Category of crime	Subtype	Licensing objective			Sector							
		Keep crime out	Protect young and vulnerable	Fairness	Legislation	Enforcement agency	Land-based	Remote	Perpetrator	Victim	Harms	Measure
Illegal or unlicensed gambling	Illegal gambling machines		Yes	Yes	Gambling Act 2005	Crown Prosecution Service/Gambling Commission	Yes		Organised crime	The State; Individuals	Economic; Societal	Enforcement; Conviction
	Unlicensed gambling (Black market)	Yes		Yes	Gambling Act 2005 (s27 & s28)	Crown Prosecution Service/Gambling Commission	Yes	Yes	Organised crime; Individuals	Gambler	Problem gambling; Violence and intimidation; Debt	Convictions
	Match fixing	Yes		Yes	Criminal Law Act 1977; Bribery Act 2010; Proceeds of Crime Act 2002	Crown Prosecution Service/Gambling Commission	Yes – Betting	Yes – Betting	Syndicate; Athlete	Athletes; Gambler; Society		
	Unfair practices	Yes	Yes	Yes	Consumer Protection Act 1987;	Competitions and Markets Authority	Yes	Yes	Organised crime; Individuals	Gambler	Financial loss	Convictions
Non-compliance	Gambling non-compliance	Yes		Yes	Gambling Act 2005	Gambling Commission	Yes	Yes	Licensees	Society	Impact on economy and society	Enforcement actions
	Underage gambling				Gambling Act 2005	Gambling Commission	Yes	Yes	Licensees	Children	Impact on education; Depression; Family cohesion	Enforcement actions
	Cheating			Yes	Gambling Act 2005 (s42)	Gambling Commission	Yes	Yes	Licensees	Gambler	Financial loss; Indebtedness	Convictions; Complaints
	Tax evasion	Yes			Criminal Finances Act 2017	HM Revenue & Customs	Yes	Yes	Licensees	The State; Society		Convictions
	Health & safety				Health & Safety at Work Act 1974	Health and Safety Executive	Yes	Yes	Licensees	Employees; Customers	Health service costs	
	Data protection			Yes	Data Protection Act 1998	Information Commissioners Office	Yes	Yes	Licensees	Gambler	Financial loss; Anxiety	Commission rates; Convictions
	Unfair practices			Yes	Consumer Protection Act 1987	Competitions and Markets Authority	Yes	Yes	Licensees	Gambler	Financial loss; Anxiety; Problem gambling	Convictions
	Unfair advertising			Yes	Advertising Standards	Advertising Standards Authority	Yes	Yes	Licensees	Gambler	Problem gambling	Complaints; Convictions
Gambling-centred crime	Cheating	Yes		Yes	Gambling Act 2005 (s42)	Gambling Commission	Yes	Yes	Organised crime; Licensees	Gambler	Debt	Complaints; Convictions

Money laundering	Yes	Terrorism Act 2000; Anti-terrorism, Crime and Security Act 2001; Proceeds of Crime Act 2002; Serious Organised Crime and Police Act 2005; Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017	National Crime Agency/Gambling Commission	Yes	Yes	Organised crime	Society	Economic; Social	Reports; Prosecutions; Convictions
Proceeds of crime	Yes	Proceeds of Crime Act 2002; Criminal Finances Act 2017	National Crime Agency/Gambling Commission	Yes	Yes	Organised crime	Society	Terrorism	Reports; Prosecutions; Convictions
Terrorist financing	Yes	Terrorism Act 2000	National Crime Agency/Gambling Commission	Yes	Yes	Terrorist groups; Organised crime	Society	Terrorism	Reports; Prosecutions; Convictions
Illegal moneylending (loan-sharking)		Consumer Credit Act 2006	National Trading Standards/Financial Conduct Authority	Yes		Organised crime	Problem gamblers	Financial harm; Depression; Anxiety; Family problems	Debt advice surveys
Fraud	Yes	Fraud Act 2006	Crown Prosecution Service/Serious Fraud Office	Yes	Yes	Organised crime; Individuals	Gamblers; Licensees	Financial loss; Trauma; Bankruptcy	Reports; Prosecutions; Convictions
Theft	Yes	Theft Act 1968	Crown Prosecution Service	Yes		Organised crime; Individuals	Gamblers; Licensees	Financial loss; Trauma	Reports; Prosecutions; Convictions
Robbery	Yes	Theft Act 1968	Crown Prosecution Service	Yes		Individuals	Licensees	Financial loss; Trauma	Reports; Prosecutions; Convictions
Assault	Yes	Criminal Justice Act 1988; Anti-social behaviour, Crime and Policing Act 2014	Crown Prosecution Service	Yes		Individuals	Gamblers	Physical harm; Trauma	Reports; Prosecutions; Convictions
Solicitation (for prostitution)	Yes	Sexual Offences Act 2003	Crown Prosecution Service	Yes		Organised crime	Society		Reports; Prosecutions; Convictions
Vandalism	Yes	Criminal Damage Act 1971	Crown Prosecution Service	Yes		Individuals	Licensees; Gamblers		Reports; Prosecutions; Convictions
Antisocial behaviour	Yes	Anti-social behaviour, Crime and Policing Act 2014	Crown Prosecution Service	Yes		Individuals	Licensees; Gamblers		Reports; Prosecutions; Convictions

	Passing counterfeit currency	Yes		Forgery & Counterfeiting Act 1981	Crown Prosecution Service	Yes		Organised crime	Licensees; Gamblers; Society		Prosecutions; Convictions; Percentage of counterfeit monies found in gambling system
	Drug dealing	Yes		Misuse of Drugs Act 1971	National Crime Agency	Yes		Organised crime	Gamblers; Society		Reports; Prosecutions; Convictions
	Match fixing/spot fixing		Yes	Criminal Law Act 1977; Bribery Act 2010; Proceeds of Crime Act 2002	Crown Prosecution Service/Gambling Commission/Interpol	Yes – Betting	Yes – Betting	Organised crime			Suspicious betting incidents; Prosecutions; Convictions
	Cybercrime – extortion	Yes		Computer Misuse Act	National Crime Agency		Yes	Organised crime; Individuals	Licensees		DDOS incidents; DDOS threats; Prosecutions; Convictions; Funds spent on prevention; Funds spent on paying blackmail
	Cybercrime – identity theft	Yes		Data Protection Act 1998	National Crime Agency		Yes	Organised crime; Individuals	Individuals	Financial loss; Trauma	Reports; Prosecutions; Convictions
	Bribery	Yes	Yes	Bribery Act 2010	Serious Fraud Office	Yes	Yes	Business; Officials	Officials; Society		Prosecutions; Convictions
Criminogenic gambling	Blackmail			Theft Act 1968	Crown Prosecution Service	Yes	Yes	Organised crime; Individuals	Problem gambler		Reports; Prosecutions; Convictions
	Theft			Theft Act 1968	Crown Prosecution Service	Yes	Yes	Problem gambler	Family and friends; Vulnerable people	Bankruptcy; Debt	Prosecutions; Convictions
	Embezzlement			Fraud Act 2006	Crown Prosecution Service/Serious Fraud Office	Yes	Yes	Problem gambler	Employers; Fellow employees		Prosecutions; Convictions
	Forgery		Yes	Forgery & Counterfeiting Act 1981	Crown Prosecution Service	Yes	Yes	Problem gambler	Society	Financial harms	Prosecutions; Convictions
	Vandalism	Yes		Criminal Damage Act 1971	Crown Prosecution Service	Yes		Problem gambler	Licensee		Reports; Prosecutions; Convictions
	Assault	Yes		Anti-social behaviour, Crime and Policing Act 2014	Crown Prosecution Service	Yes		Problem gambler	Gambling employees; Other gamblers		Reports; Prosecutions; Convictions

Anti-social behaviour	Yes		Anti-social behaviour, Crime and Policing Act 2014	Crown Prosecution Service	Yes	Problem gambler	Gambling employees; Other gamblers; Neighbouring businesses; Community	Reports; Prosecutions; Convictions	
Spousal abuse	Yes		Serious Crime Act 2015	Crown Prosecution Service	Yes	Yes	Problem gambler; Organised crime	Family members	Prosecutions; Convictions
Child abuse	Yes		Serious Crime Act 2015	Crown Prosecution Service	Yes	Yes	Problem gambler; Organised crime	Children	Prosecutions; Convictions
Kidnapping	Yes		Offences Against the Person Act 1881; Child Abduction Act 1984	Crown Prosecution Service	Yes	Yes	Organised crime	Family members	Prosecutions; Convictions
Burglary/home invasion	Yes		Theft Act	Crown Prosecution Service	Yes	Yes	Organised crime	Family members	Prosecutions; Convictions
Intimidation & violence	Yes		Protection from Harassment Act 1997	Crown Prosecution Service	Yes	Yes	Organised crime	Family members	Prosecutions; Convictions
Match fixing	Yes	Yes	Criminal Law Act 1977, Bribery Act 2010, Proceeds of Crime Act 2002	Crown Prosecution Service/Gambling Commission/Interpol	Yes	Yes	Syndicate; Athlete	Athlete; Gambler	Reports; Prosecutions; Convictions