

# Skins in the Game

A high-stakes relationship between gambling and young people's health and wellbeing?



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The report was funded by a grant from GambleAware. The content is solely the responsibility of the authors and does not necessarily represent the views of GambleAware. The recommendations are owned by the Royal Society for Public Health.



## What did we set out to do?

- We explored the views and attitudes of young people aged 11 to 24 towards gambling
- Between November 2018 and November 2019, we spoke to over 1,100 young people around their understanding of the relationship between gambling and their health and wellbeing
- We held six in-depth focus groups with young people across England, Scotland and Wales, with the findings used to develop a survey that was completed by 1,025 11-24 year olds

## What have we found out?

- Young people consider gambling to be an increasingly normalised presence in their lives, with gambling harms associated with a significantly increased risk of health issues such as depression and anxiety
- Young people say that they are more likely to gamble at times of low emotional wellbeing, when they are feeling bored, aimless or lonely
- Young people consider loot boxes and skin betting to be highly addictive forms of gambling
- Individuals between the ages of 11 and 14 are those most likely to be taking part in the forms of gambling and gambling-like activity that young people say are the most addictive
- Young people feel that the relationships between gambling and gaming, and gambling and sports, are both negative ones for their generation

## What do young people want to see change?

- ✓ To be given more information at school on the health risks associated with different forms of gambling and gambling-like activity, the support services available to them, and for this to start earlier in their childhood
- ✓ Teachers and parents to be given more information in order to support young people to avoid gambling harms
- ✓ The purchase of loot boxes and skin betting to be legally recognised as forms of gambling
- ✓ Games developers and platforms to do more to make them aware of the risks associated with loot boxes and skin betting
- ✓ The sports industry to do more to raise awareness of the risks associated with gambling harms and their potential impact upon health

## How can this change happen?

- A broader definition of gambling to be included in the Health Education Curriculum and introduced to young people at primary school
- The development of education programmes for parents and carers around gambling harms
- The introduction of legislation to classify loot boxes and skin betting as legally recognised forms of gambling
- The development of a set of criteria and the technology required to identify problematic spending on loot boxes and in-game content
- The introduction of legislation preventing gambling operators from acting as title sponsors for sports clubs



## Foreword by Shirley Cramer, Chief Executive of the Royal Society for Public Health

Research published by the Gambling Commission in February 2019 found that almost half of adults in the UK had gambled in the last four weeks<sup>1</sup>. For the majority of us, gambling can be a leisure activity enjoyed in moderation, with the individual taking part making an informed and controlled choice to do so.

Sadly, this is not always the case. By its very nature, gambling can be an inherently risky activity, with some people betting with limited resources and the potential for it to become an addiction. It is estimated that there are currently over 300,000 people in the UK with symptoms of gambling disorder<sup>2</sup>, making this an issue of real and growing concern.

Gambling harms have been shown to lead to serious consequences for an individual's health and wellbeing, including a higher risk of debt, mental health issues, substance abuse, physical health disorders, poor educational performance and damage to relationships<sup>3</sup>. It is with growing concern that in recent years, we have increasingly seen the impact of gambling harms on the health of children and young people.

This year, the National Problem Gambling Clinic in London announced that they were expanding their provision to offer specialist help for children and young people aged 13-25<sup>4</sup>. We have also seen the number of gambling related admissions to hospital reach record highs, with more than one in 10 aged 25 and under<sup>2</sup>.

There are also emerging fears around the role that the sports and gaming industries play in normalising gambling activity amongst children and young people.

The Office of the Children's Commissioner and the Department for Digital, Media, Culture and Sport Committee have called for the purchase of loot boxes on mobile and video games, something that nearly a third of young people have bought, to be legally classified as gambling<sup>5</sup>. The advertising and marketing of gambling has increased significantly; such that every matchday, tens of thousands of young people will see their role models play football in a shirt sponsored by a gambling operator.

This is now rightly recognised as a public health issue that is growing and developing at pace, driven by technological advances. It is one that requires an urgent and population-wide response. It is essential that young people are supported to recognise the risks of gambling harms and to develop strategies to deal with them. It is also crucial that the legislation in place to protect young people is updated to recognise the prevalence of advertising and the new forms that gambling can take. It is vital that these aims are achieved through transparent, robust and constructive engagement with industry.

Our report helps us to better understand what young people think about gambling and gaming, how it impacts their health and wellbeing and what can be done to protect them. It provides us with insight on the ways in which gambling manifests itself in their lives and the support they want to see introduced to help them to avoid gambling harms. This is an area of health and wellbeing where the stakes are high, but one where a public health approach can prevent the cost of gambling harms being passed to future generations.

# Gambling and young people –

## The current state of play

### What is gambling?

The Gambling Act 2005 defines gambling as betting, gaming or participating in a lottery. It focuses on activities that require their operators to hold a license; namely arcades, betting, bingo, casino, lotteries and gaming machines<sup>6</sup>. The Act defines gaming as only constituting gambling, if this activity includes an “element of chance and an element of skill”, in an attempt to win a prize of money or something of a fixed monetary value.

The legal age for a young person placing a bet with a gambling operator, gambling at a casino or using a high category games machine such as a fixed-odds betting terminal or a gaming machine, with a potential monetary prize of over £5, is 18<sup>6</sup>. The minimum legal limit for buying a scratchcard or a National Lottery ticket is 16. There is no minimum age for players of category D gaming machines, such as a crane grab or penny-push machine<sup>7</sup>.

The Gambling Act 2005 saw the creation of the Gambling Commission, which acts as a regulator for the gambling industry in the Great Britain. The Gambling Commission carries the responsibility for keeping crime out of gambling, for keeping gambling fair and open and for protecting children and vulnerable people from gambling related harms<sup>6</sup>.

### How many children and young people gamble?

A 2019 study by the Gambling Commission found that approximately one in 10 (11%) of 11-16 year olds had spent their own money on gambling in the past seven days, with boys being twice as likely gamble as girls<sup>8</sup>. This compares to 16% who had drunk alcohol in the past week, 6% who had smoked a tobacco cigarette and 2% who had taken illegal drugs<sup>8</sup>.

The Gambling Commission has identified that 1.7% of 11-16 year olds are classified as ‘problem’ gamblers<sup>8</sup>, reporting activity including lying about gambling, risking relationships through gambling and taking money without permission in order to gamble<sup>9</sup>. This figure has increased since 2017, when 0.9% of 11-16 year olds were identified as problem gamblers<sup>10</sup>.

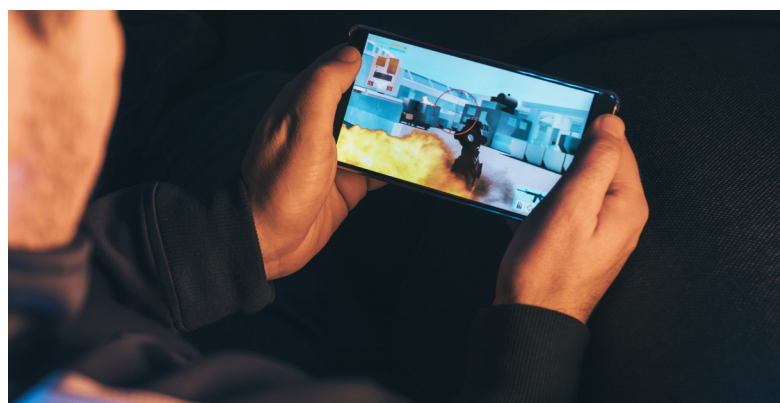
### What are the most popular types of gambling for young people?

For 11-16 year olds, research indicates that the most popular gambling activity undertaken in the last seven days was placing a private bet with friends for money (5%), followed by playing on a fruit or slot machine (4%)<sup>8</sup>. In 2019, an increase was observed in the number taking part in online gambling (3%) compared to the equivalent figure for 2018 (1%).

### What are the reasons that young people give for participating in gambling?

Young people provide a wide variety of reasons for having gambled for the first time, including excitement and wanting to make money<sup>8</sup>. Other factors, such as simply wanting something to do (31%) and family influence (10%) have also been indicated to play a role<sup>8,11</sup>. It has also been indicated that young people attach too much importance to factors such as skill in determining their chances of winning, providing them with the confidence to gamble<sup>12,13</sup>.

Several studies have also focused on the impact of the relationship between gaming and gambling in encouraging activity that has been compared to gambling, such as buying a loot box. Nearly half (49%) of young people feel that some games were only fun when they spend money and approximately one in five (18%) feel that they need to spend money to enjoy the game<sup>14</sup>.





### **Where do young people find out about different types of gambling?**

In a 2019 Gambling Commission report, seven in 10 11-16 year olds said that they had heard or seen gambling adverts or sponsorship<sup>8</sup>. There is also evidence to suggest that children and young people follow and actively engage with gambling related accounts on social media, with approximately one in eight (12%) 11-16 year olds follow gambling companies on social media such as Facebook, YouTube and Instagram<sup>8</sup> and 41,000 followers of gambling related accounts in Great Britain estimated to be aged 16 and under<sup>15</sup>.

A number of studies show that the influence of family members and peers plays an important role in exposing young people to gambling activity. It has been shown that for many children and young people, their first experience with gambling was through their parents buying them a National Lottery ticket<sup>16</sup>. Studies have also found that gambling preferences and attitudes are often transmitted to young people by their parents and that social gambling with family members and friends often acting as a bonding opportunity<sup>17</sup>.

### **How aware are young people of the support services available for gambling harms?**

It has been demonstrated that educating young people around the risks of gambling is an important preventative measure that can help protect them from

the dangers associated with disordered gambling<sup>18</sup>. However, in the 2018 Gambling Commission report, approximately one in four (23%) young people were aware of GambleAware and only one in 10 (10%) were aware of the National Gambling Helpline<sup>19</sup>.

### **Gambling and young people's health and wellbeing**

A number of different organisations, including the Gambling Commission, GambleAware and the NHS, have called for gambling to be considered as a public health issue.

This is based on evidence demonstrating that gambling, particularly disordered gambling, is associated with several other risks to health. The Gambling Commission has identified that a young person who has gambled in the past seven days is significantly more likely to have drunk an alcoholic drink, smoked a cigarette and taken illegal drugs, than a young person who is a non-gambler<sup>8</sup>. Numerous studies have shown that the relationship between gambling and risky health behaviours is often bidirectional, creating a self-reinforcing cycle of activity<sup>13,20</sup>.

Over the course of 2019, a number of stakeholders have raised concerns around the wider impact of gambling on the health and wellbeing of young people.

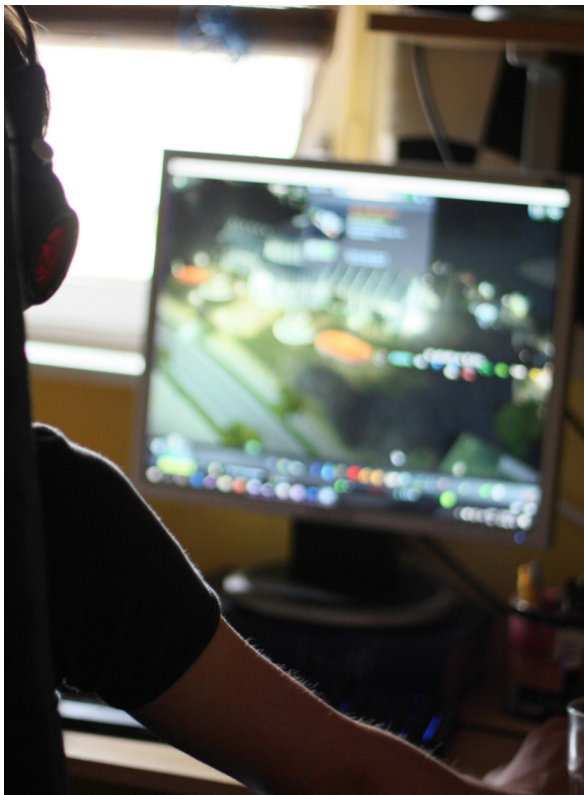
## The UK Government

In April 2019 the Government published the Online Harms White Paper, which included a brief reference to gambling harms and young people<sup>21</sup>. This included endorsing changes due to be introduced by the Gambling Commission in May 2019, designed to ensure that the identity and age of an individual is verified before they are able to gamble online.

In July 2019, the Government announced a consultation on whether to raise the age limit for participation in some or all National Lottery Games to 18, from its current limit of 16, in order to “ensure that young people are rightly protected from the potential risks of gambling related harm”<sup>22</sup>.

## National Health Service

In October 2019, the National Problem Gambling Clinic expanded its provision to provide services for young people aged between 13-25<sup>4</sup>. NHS Chief Executive Simon Stevens has described the service as “a response to an emerging problem, part of the increasing pressures that children and young people are exposed to these days”<sup>4</sup>. Across England there were 335 gambling related admissions to hospital in 2017/18, representing an increase from 263 in 2016/17 and 298 in 2015/16. 44 of the admissions reported in 2017/18 were of individuals aged 25 and under<sup>23</sup>.



## Department for Digital, Culture, Media and Sport Committee

In September 2019, the House of Commons Digital, Culture, Media and Sport Committee published its report on *Immersive and Addictive Technologies*<sup>5</sup>. The report called for ‘loot boxes’, virtual items that can be purchased in-game that contain unspecified and randomised items to improve gameplay, ranging from customisation of the player’s character to equipment such as weapons and armour, to be legally recognised as gambling. The reports states that loot boxes “come at a high cost, particularly for problem gamblers, while exposing children to potential harm”<sup>5</sup>.

## The Office of the Children’s Commissioner

In October 2019 the Office of the Children’s Commissioner published its *Gaming the System* report, exploring the impact of gaming on young people’s wellbeing. It identified a number of concerning links between gaming and gambling, particularly around the purchase of loot boxes. The report noted that “adults who gamble tend to have boundaries and control measures in place to mitigate against harm. Children are unlikely to be able to put these in place for themselves”<sup>24</sup>.

## The All-Party Parliamentary Group (APPG) on Gambling Related Harm

In November 2019, the APPG on Gambling Related Harm released its interim report on online gambling<sup>25</sup>. The report called for the Gambling Commission to “take a closer look” at the emerging world of gaming and loot boxes and for the legal definition of gambling to be changed to allow for this to happen. It also criticised the popular football video game series FIFA, for showing teams and players wearing kits showing gambling sponsors, despite the majority of FIFA players being young people and gambling adverts not being permitted in games or websites that are popular with children.





## Gaming and gambling – Are young people being made to play a dangerous game?

A number of stakeholders have highlighted concerns around links between gambling and online mobile and video games. This is of particular relevance to this report, given that 93% of young people regularly play video games<sup>14</sup>. Stakeholders have expressed fears that the mechanisms underpinning both loot boxes and skin betting, which are explored below, are the same as those that are involved in gambling.

This raises concerns that such activities introduce young people to gambling, before they have been able to develop strategies to avoid gambling related harms. The blurring of boundaries between an activity undertaken by the vast majority of young people and gambling, also creates concern that it could become a normalised feature of their lives.

### What are loot boxes?

Loot boxes are items embedded within games, containing randomised rewards which are uncertain at the point of purchase. These can be cosmetic, such as 'skins' that change the appearance of an in-game character, or functional, providing users with an advantage in gameplay. Developers rarely disclose the odds of winning specific items when purchasing a loot box, meaning that gamers are unaware as to how likely it is that they would win an item that is seen to be rare or of value<sup>26</sup>. Whilst boxes can be bought using virtual in-game currency accumulated through gameplay, players are encouraged to buy this currency using real-world money to expedite the process<sup>26</sup>.

### How many young people use loot boxes?

A 2019 report by Parent Zone found that nine in 10 (91%) young people reported that there were loot boxes available in the games they play and two in five (40%) had paid to open one<sup>14</sup>. The Gambling Commission found that almost twice as many boys (66%) have heard of in-game items such as loot boxes, than girls (37%)<sup>8</sup>. The global loot box market is estimated to be worth £20 billion, with the UK market alone valued at £700 million<sup>27</sup>.

## Is there a link between loot boxes and gambling?

A 2019 report by the Children's Commissioner identified many features of purchasing loot boxes, including spending money to try and win an unknown reward and examples of young people buying multiple loot boxes to 'chase losses', to conclude that "other than the fact that these rewards come in the form of in-game benefits rather than real-world currency, this behaviour is much like gambling"<sup>24</sup>. The Department for Digital, Culture, Media and Sport Committee has stated that "buying a loot box is playing a game of chance and it is high time the gambling laws caught up"<sup>5</sup>.

A large-scale survey of gamers carried out in 2019 identified evidence demonstrating that disordered gambling is closely linked to spending on loot boxes<sup>28</sup>. Whilst the study was unable to identify a causal link, the author of the report has stated that loot boxes represent a way in which "video games companies may, accidentally or incidentally, be profiting from problem gambling among their consumers"<sup>5</sup>.

## How are concerns around loot boxes being addressed in other countries?

In both the Netherlands and Belgium, gambling regulators have taken the position that loot boxes violate their gambling laws and introduced a number of regulations to protect gamers<sup>29,30</sup>. Following the introduction of this legislation, a number of games developers have ended the sale of the in-game virtual currency required to buy loot boxes<sup>29</sup>. The Belgian Government has called for a European Union-wide ban on loot boxes, arguing that "mixing gambling and gaming, especially at a young age, is dangerous for the mental health of the child"<sup>31</sup>.

## What is the current position taken by authorities in the UK?

In June 2019, the Gambling Commission reaffirmed its position that loot boxes should not be considered as gambling under the Gambling Act 2005<sup>32</sup>, as they considered that there is no official way to attach a fixed monetary value to the contents of a loot box. The Gambling Commission has, however, acknowledged that there are "serious concerns" around loot boxes and that "there is unquestionably a demand for a secondary market", referring to the unofficial third-party sites where the content of loot boxes are sold for both virtual currency and real-world money<sup>32</sup>.

## Skin Betting

### What is skin betting?

Skins are downloadable graphic or audio-based items that change the appearance of a character within a game. Whilst other items obtained through loot boxes can affect gameplay and improve the player's abilities within the game, skins are purely cosmetic.

Skin betting involves the 'skins' obtained whilst gaming to be used as a virtual online currency, in order to gamble on the outcome of a real-life or virtual event. Individuals are able to effectively use the skins in their possession as poker chips, in order to gamble in an attempt to obtain more valuable skins<sup>33</sup>.

### How many young people take part in skin betting?

A study published in 2018 found that 30% of 13-18 year olds in the UK were aware of skin betting and that 10% (nearly 450,000 young people) had taken part in skin gambling in some form<sup>33</sup>.

### What is the link between skin betting and loot boxes?

The skins that are used by gamers to take part in skin betting are often the items obtained through purchasing a loot box. The combined value of the loot box and skin gambling market is anticipated to reach \$50 billion by 2022<sup>34</sup>.

### Is there a link between skin betting and gambling?

A number of third party sites have been set up allowing users to exchange the skins they own in return for cash. This establishes clear financial inputs and outputs to gambling activity on games, with gamers able to:

1. Use real-world money to purchase a loot box, in the hope of obtaining a skin that is considered to be valuable
2. Gamble these items on an event, in the hope of obtaining something that is considered to be more valuable
3. Cash these items out for real-world money, based on a value determined by an unregulated online market

## How are the concerns around skin betting being approached?

The Gambling Commission has committed to “cutting off the oxygen to unlicensed gambling websites or those who provide opportunities to cash-in in-game items”<sup>35</sup>. Whilst the Gambling Commission has stated loot boxes do not currently fall within its remit, it has

recognised the interplay between loot boxes and skin betting has the potential to move this activity closer to the legal definition of gambling, stating that “where in-game items that are derived from loot boxes can be readily exchanged for cash, the loot boxes themselves are likely to fall within the definition of gambling”<sup>36</sup>.



## Case studies

### Case Study 1 - FUT Galaxy

In June 2017, the owners of a website called FUT Galaxy were fined £265,000 by a UK court for inviting children to gamble on real-life football matches, using the virtual in-game currency from the popular FIFA games series<sup>37</sup>. This currency can be purchased in-game using real-world money, with vouchers available up to the value of £79.99. Coins won through the gambling that took place through FUT Galaxy could be exchanged for real-life money on third party websites. The impact of the website in encouraging children to gamble was described as ‘horrific’ by the court, after being shown a video of 12 year old gambling using the site. Another 14 year old user of FUT Galaxy lost £586 in a single day<sup>37</sup>.

### Case Study 2 – Skin Betting

One young person from Wales lost over £2,000 between the ages of 15 and 19, after becoming involved in skin betting. At times, the individual in question was unable to buy food, as he considered this to be a lower priority than buying skins to gamble online<sup>38</sup>. The individual summarised his motivation for taking part in skin betting by saying that “it’s hard to ask your parents for £1,000 to buy a knife on CSGO (the multiplayer first-person shooter game Counter Strike: Global Offensive), it’s a lot easier to ask for a tenner and then try and turn that into £1,000”<sup>38</sup>.

### Case Study 3 – Hidden Artifacts

Between February and May 2019, a 22 year old with cerebral palsy, complex epilepsy and learning difficulties spent his life savings of £3,160 on in-game purchases on an online game called Hidden Artifacts<sup>39</sup>.

# Sports and gambling –

## Are young people watching an unhealthy match?

A number of stakeholders have highlighted concerns around links between gambling and the sport industry. This has largely centred around the high visibility of gambling related advertising and sponsorship surrounding sporting events, with fears that this can contribute to the normalisation of gambling as part of their day-to-day lives.

### What is the nature of the relationship between gambling and sport?

A great deal of attention has been focused on the relationship between gambling and football, a sport that 44.7% of all 11-15 year olds play at least once a month<sup>40</sup>. In the current 2019/20 season, half of Premier League clubs have gambling operators as shirt sponsors, generating nearly £70 million in revenue for those clubs<sup>41</sup>. In the second tier of English football, the Sky Bet Championship, 17 of the 24 teams have gambling operators as shirt sponsors<sup>41</sup>.

There is evidence to suggest that the relationship between gambling and sports is growing. In 2019, Major League Soccer, the top division of football in the USA, changed their regulations to allow commercial sponsorship by gambling operators<sup>42</sup>. Also in 2019, the Professional Golf Association Tour relaxed their regulations to allow gambling companies to be considered as 'Official Marketing Partners' for professional tournaments and players<sup>43</sup>.

### What is the impact of the relationship between gambling and sport?

Over one third (41%) of 11-16 year olds say that they see a gambling sponsorship on the TV or radio at least once a month and 37% say that see a gambling sponsorship in sports venues at least once a month<sup>15</sup>. An analysis of the advertising shown on UK television during the 2018 Football World Cup found that viewers in the UK saw nearly 90 minutes of gambling advertising over the course of the tournament<sup>44</sup>.

This had led to fears from a number of academics that gambling has become a normalised feature of football, with the game strongly associated with gambling in the minds of supporters, a process described by as the "gambification of football" by one academic at the University of Bath<sup>45</sup>. A paper published by Cardiff Metropolitan University argues that the esteem in which young people hold footballers as role models,

also contributes to the normalisation of gambling across this audience, stating that "high-profile footballers play a further role in normalising drinking and gambling. They are role models whose actions influence others"<sup>46</sup>.

### How are the concerns around the relationship between gambling and sport being approached globally?

There are currently very few examples of authorities in other jurisdictions acting to disrupt the relationship between gambling and sport. However in 2018, the Italian Government announced a ban on all gambling adverts, which included any sponsorship deals held by sports clubs with gambling operators<sup>47</sup>. This meant that any organisation with an existing sponsorship arrangement with a gambling operator had to terminate their relationship by August 2019<sup>47</sup>.

### How are the concerns around the relationship between gambling and sport being addressed in the UK?

There have been calls for the relationship between gambling and sport in the UK to be investigated, with Tom Watson, the then Deputy Leader of the Labour Party, calling in 2017 for shirt sponsorship to be banned, as it "puts gambling brands in front of fans of all ages"<sup>48</sup>.

In July, Huddersfield Town unveiled a new kit featuring Paddy Power as their title sponsor. The logo used on the kit was unusually large and breached Football Association regulations around sponsorship, for which Huddersfield were fined £50,000<sup>49</sup>. Following a week of significant publicity around the shirt, Paddy Power announced that the kit was part of a publicity stunt and that Huddersfield would play in a shirt without a logo, as part of the fan-led Save our Shirts campaign, which has the aim of removing all forms of sponsorship from football shirts<sup>49</sup>.

However, the incident did not receive universal support, with the Football Association stating that the decision “to enlarge the advertisement in such an overt manner was irresponsible, particularly in the current climate regarding gambling”<sup>49</sup>. Similarly, the aforementioned All-Party Parliamentary Group on Gambling Related Harm also stated that “while Paddy Power (Flutter) made a joke out of football shirt sponsorship in recent months, that such a joke could be made is an indictment of the current state of gambling sponsorship proliferation”<sup>25</sup>.

There are also a number of safeguards and regulations in place that are intended to protect children and young people from some of the exposure incurred by gambling sponsorships of sports leagues, teams and stadia. This includes the logos of gambling operators not being featured on replica shirts sold in children’s sizes, as well as the recent announcement of a whistle-to-whistle ban on gambling advertising during sports broadcasts<sup>50</sup>. However, a number of case studies suggest that these safeguards are neither watertight nor insurmountable.

## Case studies

### Case Study 1 – Junior Fans

In 2018, a BBC investigation found links to gambling websites or the logos of gambling operators in the junior sections of 15 different football clubs<sup>51</sup>. This included a logo for the lead sponsor of Wolverhampton Wanderers Football Club, the gambling operator W88, on the page for ‘Junior Fans’.

### Case Study 2 – Wayne Rooney and 32Red

In 2019 Derby County, a Championship football club sponsored by the betting operator 32Red, announced the signing of former England captain Wayne Rooney. When announcing the signing, the Chairman of the club said that “obviously, the commercial opportunities this creates are widespread and significant. On the back of Wayne joining the club, we have just been offered a record-breaking sponsorship deal with our principal shirt sponsor, 32Red”<sup>52</sup>.

The club have since announced that Rooney will wear the number 32 on the back of his shirt, which mirrors the 32Red logo on the front of the shirt<sup>52</sup>. Whilst the logo for 32Red would not be featured on any replica shirts sold to children, it is likely that

a number of young people will choose to have the number 32 printed on the back of their shirt.

This move has been criticised by the Church of England and a number of health organisations. A UK Government Minister called for the club to “to look within themselves and think about the impact that problem gambling can have on some in society, particularly vulnerable people and youngsters”<sup>53</sup>.

### Case Study 3 – Neymar Jr and PokerStars

In 2015 Neymar Jr, the world’s most expensive footballer, was hired as a brand ambassador for the online poker company PokerStars<sup>54</sup>. As part of the role, Neymar Jr took part in a number of events to promote the organisation, with one video of him playing poker with his teammates having been viewed over 1.5 million times on YouTube.

Neymar Jr is the ninth most-followed Instagram user, with over 128 million followers. Whilst it is unknown how many of these followers are aged below 25, it is estimated that over 35% of all Instagram users fall into this age category<sup>55</sup>.

# Methodology

Our research aim was to better understand how young people aged between 11 and 24 in England, Scotland and Wales understand gambling, particularly emerging forms of online gambling, and the impact this can have on their health and wellbeing.

We used a mixed-methods approach to conduct this research.

## Focus Groups

From November 2018 to August 2019, we held a series of six focus groups with a total of 79 young people across England, Scotland and Wales. In each of the three countries, we held a focus group with participants aged between 11 and 16 and another with participants aged between 17 and 24.

## Survey

The qualitative findings and learning taken from the focus groups were used to design questions for a survey that was distributed to young people across England, Scotland and Wales by RSPH and several partner organisations, between September and November 2019. The survey was conducted through Survey Monkey and promoted through social media channels.

The survey was responded to by 1,025 young people who met the inclusion criteria.

## Survey Inclusion Criteria:

Being a young person aged between 11 and 24, living in the United Kingdom.

## Survey Demographics

The full demographic data on survey respondents is included in the appendix of this report.

The ethnicity of respondents is broadly representative of the UK population, with the vast majority (87%) identifying as White. This is the same figure as that reported in the 2011 census<sup>56</sup>. There is a slight underrepresentation in the proportion of respondents identifying as Black/African/Caribbean/Black British in the survey (1%) compared to the national figure reported in the 2011 census (3%). For all other ethnic groups, the survey is broadly representative.

The location of respondents is also broadly representative of the UK population. The vast majority of respondents (79%) live in England (this includes those who had responded with 'Other' and provided a location in England), with the 2011 census identifying a similar figure overall (84%). The proportion of respondents living in Scotland (10%) and Wales (4%), are broadly similar the respective figures identified by the 2011 census for both Scotland (8%) and Wales (5%)<sup>56</sup>.

# Limitations

## Gender

The majority of take-up in the survey was by males (83%), compared to females (14%) and respondents who preferred to either not to say (2%) or to self-describe (2%). This limits the extent to which our survey is representative of the general population. However, there is evidence to suggest that there are significant differences related to awareness and participation around gambling-like activity and some of the themes referenced in this report, between males and females<sup>8</sup>. This includes more males participating in both gambling and attending football matches<sup>8</sup> and a greater awareness amongst young males of the purpose of both loot boxes and skin betting<sup>8</sup>.

A worldwide study of 270,000 gamers found that males have significantly higher participation rate in the video and mobile game genres that have been most heavily associated with loot boxes and skin betting, such as the FIFA series and Fortnite. The study found that just 2% of players of sports games, such as FIFA, were female, with 14% of players of open-world games, such as Fortnite, being female.<sup>57</sup>

## Age

The majority of take-up of the survey was by those aged between 11 and 17 (70%), compared to those aged between 18 and 24 (30%).



# What did young people tell us?



## Young people consider gambling harms to be a risk to multiple areas of their health and wellbeing

- **Eight in 10 (85%)** young people say that gambling harms increase the risk of a peer experiencing depression and nearly three quarters (73%) say that they increase the risk of a peer experiencing anxiety
- **Nearly three quarters (73%)** say that gambling harms increase the risk of a young person engaging in alcohol misuse and six in 10 (63%) say that they increase the risk of a young person engaging in substance misuse.
- **Nearly eight in 10 (79%)** say that young people could find loot boxes to be addictive, with around seven in 10 (69%) saying that skin betting could be addictive
- **Over half of young people (53%)** say that educational initiatives around gambling harms should focus on the health impact of disordered gambling, rather than the financial impact
- **Less than half of young people (46%)** would be confident in knowing where to signpost a friend for support around disordered gambling

**This research has found that young people see gambling as an activity that is strongly associated with health and wellbeing.**

The call from a majority of young people for education around gambling harms to be delivered with a focus on health, rather than solely on financial wellbeing, is an important finding when considering future educational interventions. In the focus groups, when asked to define the relationship between gambling and health, young people often made analogies between participation in gambling and drinking alcohol or taking drugs.

In the focus groups undertaken as part of this research, young people often stated that they would like additional information and guidance on the specific nature of the impact of gambling harms upon health. Although they felt that gambling represented a risk to health and wellbeing and could suggest a myriad of ways in which they thought it could be affected by gambling harms, they often were unable to suggest where they would go to look for information, advice and support.

In the focus groups, participants often felt that a key difference between gambling harms and other health risks, was the lack of a simple and well-known explanation of how gambling can specifically impact upon health and wellbeing.

*I think the reason that it's sometimes not taken as seriously by people our age is that there isn't always that one really obvious way it affects your health. Like with smoking, everyone knows straight away it's your lungs that get hurt. I know that gambling can be bad for you, I'm never 100% confident in saying how*

14 year old female focus group participant from Scotland





The findings around gaming and gambling will be further explored later in this summary. It is however important to note that the vast majority of respondents considered gambling-like activity through gaming, such as buying loot boxes and taking part in skin betting, to be addictive. In both the survey and the focus groups, a number of cases were identified that demonstrated the potential for young people to find this activity to be addictive.

*When I was 13, I spent all my birthday money on packs on FIFA and then starting to use my mum's card to buy more when that had gone. I knew it was wrong, but I couldn't stop. I'd spend all my time thinking about when I could next get a pack. It's so easy to get caught up in – I was definitely addicted*

14 year old male focus group participant from Wales

*Our generation is growing up faster than all the ones before us. There are lots more risks for us and we need way more support on things like this*

22 year old female focus group participant from England

In the focus groups, participants often placed the risks associated with this form of activity, alongside the potential harms that can arise from a number of aspects of modern life for their generation, such as using social media. This was often the basis for them to call for education-based initiatives, supporting them to manage these risks. This was reinforced by our survey, with these programmes being the most popular calls to action from young people.



## Gambling-like activity is seen as a normal part of young people's lives

- **Nine in 10 (90%)** young people believe that buying a loot box is normal for someone their age, with approximately seven out of 10 (67%) agreeing that it was normal for a peer to take part in skin betting
- **Over one third (38%)** of young people said that a young person is likely to take part in gambling, because they are unaware that what they are doing is classed as gambling
- When asked to state that which groups of people were most likely to gamble, **a quarter (25%) of young people** felt that it was something undertaken by teenage males between the ages of 11 and 19.

*I think it's one of those issues that nobody really talks to us about. There's been loads of stuff on things like social media and health lately, but nothing on gambling*

13 year old male focus group participant from Scotland

**Young people see gambling and gambling-like activity as an increasingly normal part of their lives.**

*We need to stop acting like repeated gambling is normal and healthy for teens when it is destructive and should be viewed like drugs and alcohol*

Female survey respondent aged 15-17



The gambling-like activities that young people considered to be the most potentially addictive, including buying a loot box and taking part in skin betting, were also the activities that most respondents considered to be the most normal for their peers to take part in. In focus groups, young people often felt that more could be done to raise awareness of the risks associated with participation in gambling, in order to disrupt this perceived normality.

*It needs someone to come out and say it's a problem. Otherwise we'll just get on with it*

14 year old focus group participant from Wales



In both the survey and the focus groups, young people raised concerns that this growing normality made it likely that their peers could participate in gambling-like activity, without being aware that they were doing so. In the focus groups, this was particularly clear when discussing the relationship between gaming and gambling. When participants were asked to name forms of gambling, loot boxes and skin betting were very rarely offered as a response. However, when asked if there was an association between the two activities and gambling, participants almost always agreed.

*It should happen at primary school. I think that younger children are more receptive to topics like this and by the time they get to our age, they'll have taken in a lot of false information about gambling*

19 year old female focus group participant from Scotland

*I wouldn't have said that at first. But when you think about it, there's not actually much difference*

13 year old male focus group participant from Scotland

Across both the survey and the focus groups, gambling-like activity was seen to be more of a pertinent issue for young males, than it was for young females. In the focus groups, young people often felt that this was due to the fact that young males were more likely to play the genre of games where loot boxes and skin betting are most prominent, including sports games such as FIFA and first-person shooter games such as Call of Duty, and also because they were more likely to show an interest in sports with a strong association with gambling, such as football.

When outlining ways in which the growing normality of gambling for young people could be disrupted, participants tended to favour early interventions, taking place as early as primary school. Young people felt that this more proactive approach was essential, due to what they saw as growing relationships between gambling and many different aspects of a young people's lives, including gaming and sports.



## Health and wellbeing issues are relevant to participation in gambling activity amongst young people

- **Over half (54%)** of young people said that being bored would make it more likely that they would gamble
- **Over a third (37%)** of young people said that feeling aimless would make it more likely that they would gamble
- **One in five (21%)** young people said that they were more likely to gamble if they were feeling lonely (21%) or if they were short on money (20%)
- **Nearly one in five (18%)** young people said they were more likely to gamble if they were worrying about something
- **One in 10 (10%)** young people said that being in debt would make a young person more likely to gamble

**The findings of our research suggest that the emotional wellbeing of a young person has a significant impact on the likelihood of them participating in both gambling and gambling-like activity.**

In the focus groups, when discussing the reasons why young people engaged in gambling and gambling-like activity, young people often suggested escapism as a key motivation. In some cases, the escapism they suggested was more temporary and small-scale in nature, such as the hope of winning a small cash prize on a scratchcard being a part of their day that they could look forward to. In other cases, young people said that gambling represented a potential 'golden ticket', something that could be the opportunity they needed to transform their everyday lives.

*I think it's a distraction for young people. If you've got a lot going on in your life, buying a scratchcard gives you a bit of hope and excitement*

21 year old female focus group participant from Wales

*This isn't a great area and a lot of young people here have a lot to deal with. Gambling might be that chance to get out and have something new*

23 year old female focus group participant from England

This suggests that for young people, financial and emotional wellbeing both act as important drivers for participation in gambling activity. This feedback was reinforced by the findings of our survey, which identified that two states of emotional wellbeing that were most likely to increase the likelihood of a young person participating in gambling activity, were feeling bored and feeling aimless. Whilst typically, young people saw gambling as an activity more likely to be done by people with large amounts of disposable income, a significant proportion said that being short on money or being in debt would make it more likely that they would gamble.

It is also important to consider the role played by social wellbeing in influencing the likelihood of a young person engaging in gambling and gambling-like activity. In the focus groups, young people often stated that peer pressure and wanting to bond with friends and family, were key influences in participation in gambling and gambling-like activity. This was reinforced by the findings of our survey, with over a third (37%) of young people saying that being friends would make it more likely that they would gamble and over two-thirds (68%) saying that gambling in order to have friendly competition with friends and family was either definitely or fairly normal for someone their age.



## Young people see gambling-like activity undertaken through gaming as a form of gambling

- **Approximately six out of 10** young people classify both purchasing a loot box (58%) and taking part in skin betting (60%) as a form of gambling
- **Over half of young people (55%)** believe that playing a mobile or video game could lead to a young person gambling
- **Over half (54%)** of young people see the relationship between gambling and gaming as a negative one for young people
- **One in 10 (11%)** young people said they took part in gambling-like activity on games because they did not want to have a worse character or team than their friends.

**Our research has found that young people consider the relationship between gambling and gaming to be a negative one.**

*Countless mobile and video games incorporate gambling, available to young people who are oblivious to the addictive and reckless behaviour it encourages*

Male survey respondent aged 15-17

Of all of the options listed in our survey, gambling-like activity through video and mobile gaming was the form that young people say they participate in most frequently. Across both gambling-like activity and activity legally recognised as gambling, it was also the form that they consider to be the most addictive. Whilst these findings held across all age groups included in our research, both the focus groups and the survey highlighted some interesting differentiations in the way in which younger and older participants viewed this issue.

Across our research, there was often a strong sense of frustration from respondents in the older age groups towards the relationship between gaming and gambling. This generally manifested itself in one of two ways.



*Gambling in gaming is ridiculous. It is jarring and depressing to see a form of media you used to love be held back from its true potential by people [games developers] who don't even understand it*

Male survey respondent aged 22-24

Firstly, there was a feeling that a past-time that they enjoyed and associated with many benefits to their wellbeing, had been quietly polluted by mechanisms they associated with gambling. This often involved comparisons made to games they played earlier in their childhood, which did not feature loot boxes or skins. Across all three focus groups with 17-24 year olds, young people commented that they felt that modern games were designed in a way that made enjoying or completing them difficult without buying loot boxes. This meant that they were being made to run the risk of engaging with content they perceived as a form of gambling, simply to continue with their game.

This was reinforced by our survey, with around one in seven (15%) of those who had bought loot boxes or taken part in skin betting saying that they had done so in order to reach a certain level to continue their game.

*That's the line from the games developers isn't it? They say that you can win loot boxes through normal gameplay but the grind to do that is impossible. If it really was easy to get loot boxes that way, they'd make no money. They know full well what they're doing*

18 year old male focus group participant from England

Secondly, there was often a sense of concern towards younger players of games, who they felt could be less well-equipped to manage the risks associated with loot boxes. This was attributed to them having less experience of participation in gambling and therefore fewer protective strategies to avoid harm. It was also felt that younger gamers had less experience of older games that did not feature items such as loot boxes and skins and were therefore less critical of them and likely to consider them as a normal aspect of gaming.

*Loot boxes in video games are becoming increasingly common and dangerous especially for young people who lack the impulse control or understand the ramifications of purchasing them*

Male survey respondent aged 22-24

*Loot boxes and packs ingrain a betting culture into young players. I believe this would make them to be more likely to be affected with a gambling addiction in the future and this is what I believe caused myself to spend excessive amounts on online betting*

Male survey respondent aged 22-24

Again, our survey also identified that factors relating to social and financial wellbeing can both drive a young person's decision to take part in gambling-like activity through games, whilst also being affected by gambling harms. In relation to social wellbeing, the direct and indirect consequences of peer pressure and competitive drive were again evident, with one in 10 (11%) fearing that without buying loot boxes, they would have an inferior team or character to their friends. In terms of financial wellbeing, whilst the majority of young people who had taken part in this activity did so using their own money, a number used a credit card (5%), a parent's card (7%) or money borrowed from friends or family (2%).

*I think the main harm comes from "cosmetics" in Fortnite and similar games. The flashy skins create a sort of peer pressure and the target demographics is way younger – they don't know much about gambling and not having to have the coolest skin ever, every time*

Male survey respondent aged 15-17



## Respondents aged between 11-14 are more likely to be taking part in the forms of gambling-like activity considered to be the most addictive and more likely to take a permissive view towards it

- **Over a quarter (27%)** of young people aged between 11-14 had bought a loot box in the week before completing our survey, compared to 16% of those aged 18 and above
- In the past week, **twice as many** 11-14 year olds said that they had bought loot boxes than 22-24 year olds and almost **twice as many** had taken part in skin betting
- **Those aged under 18** were significantly less likely than older respondents to classify an activity as gambling
- **Those aged under 18** were significantly less likely than older respondents to associate gambling harms with an increased risk of a young person experiencing health issues such as anxiety and alcohol consumption.
- **Only a quarter (25%)** of young people aged between 11-14 strongly support classifying loot boxes as gambling, compared to nearly three quarters (73%) of those aged between 22-24.

Our survey found that respondents aged between 11-14 were significantly more likely to purchase a loot box and take part in skin betting, than those aged 18 and above. These trends are reversed when looking at participation rates for other forms of gambling and gambling-like activity, especially those that are legally recognised as gambling. It is highly likely that a contributing factor to this is the minimum age limit associated with each of these forms of activity.

Of those who had bought loot boxes or taken part in skin betting, it was those in the 11-14 age group who most commonly said that they did so in order to have fun. This was a recurrent theme in the focus groups, with younger participants often seeing loot boxes as exciting and something that they perceived to be a form of risk-taking with relatively few potential negative consequences.

However when this perception was explored further in the focus groups, this sense of excitement was often associated with a certain feeling of relief experienced when the content of a loot box or the outcome of a skin bet meant that a young person could progress or perform better in the game they were playing.

This was reinforced by our survey, which found that those in the 11-14 age group were most likely to say that they had bought a loot box or taken part in skin betting in order to reach a certain level to continue with their game.

The survey found that respondents aged under 18 were significantly less likely to classify an activity as gambling, with this trend being particularly pronounced for those aged between 11-14. This included both gambling-like activity undertaken through mobile and video games, such as buying a loot box, as well as activity that is legally recognised as gambling, such as buying a scratchcard.

Whilst respondents aged under 18 were significantly less likely to support more prohibitive measures to addressing gambling harms, the manner in which this idea polarised opinion amongst respondents is notable. Amongst 11-14 year olds, classifying loot boxes as gambling was both strongly supported (25%) and strongly opposed (28%) in roughly equal measure. Amongst 22-24 year olds, this measure was strongly supported by nearly three quarters (73%) of respondents and strongly opposed just one in twenty-five (4%) .

It is important to note that when respondents and participants aged between 11-14 were asked to say whether they would classify various activities as a form of gambling, they were more likely than any other age group to say that they were unsure. This potentially suggests that a lack of awareness and experience of gambling and the mechanisms associated with it, may be of relevance to their views on these issues.

However, it is also important to consider that this would mean that these young people will have had fewer opportunities to experience gambling, to identify activity that closely resembles it and to develop protective strategies to avoid and manage gambling harms. The fact that the gambling-like activity that young people classify as being the most addictive, is being undertaken by those who are youngest and who are resistant to more prohibitive measures to restrict it, should be treated as an area for both concern and for further research.



## The impact of the relationship between sports and gambling is of concern to young people

- **In the past month, one in 10** respondents had been to a stadium sponsored by a gambling operator
- **One in 10 (11%)** respondents who gambled on sports events said they did so to fit in with friends or family members who were doing the same thing
- **Approximately a quarter (26%)** of 18-21 year olds who gambled on sports events said they did so to try and make money to pay regular bills and outgoings
- **One in 10** respondents who gambled on sports events, did so using their parents credit or debit card
- **The majority (55%)** of young people see the relationship between sports and gambling as negative for young people

The majority of respondents felt that the relationship between sports and gambling was a negative one for young people, with only one in twenty (5%) saying that it could be positive. A significant proportion said that they had been exposed to gambling operators, through sports-related activity.

A number of similarities were identified between gambling related activity undertaken by young people through sport, and that engaged in through gaming. In our survey, a number of respondents said that they gambled on sports events to fit in with a friend or family member doing the same, underlining concerns around the role of peer pressure, parental involvement and social wellbeing in driving this activity. In the focus groups, a number of participants built on this to talk about friends who often gambled on the outcomes of sports matches, despite not actively following the sport they were betting on.



*I've got plenty of friends who don't really like football but will have an accumulator on a weekend. It makes something they're not interested in fun and means they can be part of the group still*

20 year old male focus group participant from Scotland



In both the focus groups and the survey, it was clear that young people were aware of and influenced by the close relationship between gambling and sports. In the focus groups, the vast majority of participants said that they had seen advertising and promotional offers for gambling on sports events on social media or on the TV. The main source of scepticism towards initiatives such as free bets or enhanced odds on sports events, was around the terms and conditions of the offer, rather than the fact it was being offered as an encouragement to gamble.





***I mean of course you look at them [free bets] when you see them. It's free money – it makes sense to look at them***

14 year old male focus group participant from Scotland

The survey found that the proportion of young people who consider the relationships between sport and gambling and gaming and gambling to be negative, are almost identical. However in the focus groups, young people had less of a sense of injustice around the relationship between sport and gambling. In many cases, young people had more apathetic and fatalistic attitudes towards the relationship, accepting that gambling was often part and parcel of sports.

***I think they just sort of go together. Everyone likes a bet on the football***

13 year old female focus group participant from Wales

Whilst young people perceived a close relationship between sport and gambling, choosing to actually gamble on the outcome of a sports event was still generally seen as ultimately being a more optional activity, than buying a loot box was to being successful at the video game played by a gamer. Similarly, it was generally seen to be an activity that relied more on the skill and knowledge of the person gambling, compared to the random nature of buying a loot box or a scratchcard.

Nevertheless, the focus groups raised a number of examples demonstrating the impact of the close relationship between sports and gambling, particularly in relation to gambling adverts on social media. One young person talked about the regret he has experienced since not taking up a boosted-odds offer for an unlikely scorer in the 2018 UEFA Champions League semi-final.

***The worst things with sports and gambling is I always regret not betting on something. I remember seeing a really good promotion on social media for Origi to score in the Champions League Semi-Final. He'd not played all season and I knew he'd probably score. I didn't go for it and was gutted when he did score. Ever since, I've made sure that I don't miss promotions like that because it really haunts me***

16 year old male focus group participant from Scotland

In keeping with other forms of gambling or gambling-like activity, the participation of young people in gambling around sports also raised concern around financial wellbeing. The proportion of young people who used a credit card, their parent's card or borrowed money to gamble on sports event, was similar to those who had done so to take part in gambling-like activity through gaming. However, the survey identified a particularly significant spike in the proportion of 18-21 year olds gambling on sports events in an attempt to pay bills and regular outgoings, something which would benefit from further research.



# What do young people want to see change?

1. To be given more information at school on the health risks associated with different forms of gambling and gambling-like activity, the support services available to them and for this to start earlier in their childhood

*I think it's one of those issues that nobody really talks about. There's been loads of stuff on things like social media and health lately, but nothing on gambling*

13 year old female focus group participant from England



Throughout this research, young people have consistently called for improved education around gambling, gambling-like activity and gambling harms. They believe that young people should be introduced to these topics at an early age. This is associated with the way in which they perceive gambling to be an increasingly normal part of their lives and one which is steadily permeating other activities that they undertake from a young age.

*As well as e-safety and anti-bullying in school, the risks of gambling should be taught to students throughout their childhood*

Male survey respondent aged 11-14

Young people agree that gambling is a public health issue for their generation. They have told us that they are more likely to gamble at times when their wellbeing is low and they associate gambling harms with increased risk to many different areas of their physical and mental health. Despite this, they feel that there is a lack of general awareness amongst their peers of the specific impact of gambling harms and where they can go to access support around them.

Young people are not universally opposed to gambling, but they want the ability to navigate these activities safely. They would like to be able to recognise when gambling or gambling-like activity appears in their everyday lives and to be able to approach it safely.

Over 8 in 10 (**86%**) of the young people who responded to our survey support the inclusion of gambling harms in the PSHE curriculum



## 2. Teachers, parents and carers to be given more information in order to support young people around gambling harms

*Parents do need a better awareness of what could possibly happen (for example, the stories of parents that lost many thousands due to their child spending on skins)*

Male survey respondent aged 18-21

Young people believe that their generation faces a unique set of challenges to health and wellbeing, often driven at a rapid pace by technological developments. They see the increased visibility and normalisation of gambling in their day-to-day lives, as one of these challenges. At the same time, they believe that there is a significant knowledge deficit around these issues when it comes to older generations.

Whilst parents and teachers were not always the very first people that respondents said they would raise concerns around gambling with, young people clearly value the support and the potential safety net that these individuals could provide. They believe that having parents and teachers who are aware of the risks associated with gambling-like activity, particularly the more modern forms such as loot boxes and skin betting, would be a valuable protective factor.

*Parents and tutors always underestimate our generation. There's so much stuff going on that they have got no clue about*

23 year old female focus group participant from England

Over 8 in 10 **(85%)** of the young people who responded to our survey support the idea of parents and teachers being given support to spot the signs of disordered gambling

### 3. The purchase of loot boxes and skin betting to be legally recognised as forms of gambling

*The biggest risk right now is loot boxes and in-game purchases of skins. It is completely running the game industry as every game is now aiming to be a glorified casino*

Male survey respondent aged 22-24

As has been discussed, this opinion was not held universally by all young people, with significant differences in opinion noted across the different age groups we analysed. We believe that further research is required to better understand the rationale underpinning these trends. Nevertheless, it is clear that a majority of young people see these activities as forms of gambling, which are normalised, addictive and carry the potential to lead to significant harm. It is important that we put forward their call for the law to be changed in order to reflect this.

Our research found that a majority of young people believe that buying a loot box and participating in skin betting are a form of gambling, as well as being activities that young people are highly likely to find addictive. We also identified several cases of young people experiencing significant harm as a result of participation in the two activities.

*Loot boxes should definitely be classified as gambling. It's no different from online bingo to be fair*

Female survey respondent aged 22-24

Nearly six in 10 (**56%**) of the young people who responded to our survey support the purchase of loot boxes being legally recognised as a form of gambling



#### 4. Games developers and platforms to do more to make them aware of the risks associated with loot boxes and skin betting

*Running tallies of money spent on in-game gambling or sport gambling should be provided visibly and clearly. I personally spent a lot of money in the past, mostly because I wasn't aware of how much money I had spent or lost. I didn't personally find gambling itself addictive, but definitely used more money than I could through not being aware/ignorant of my finances*

Male survey respondent aged 22-24



*Requiring game developers and publishers to put clear warnings and checks in-place to warn people of gambling harms when purchasing loot boxes would go a long way to helping reduce these harms*

Male survey respondent aged 22-24

Over seven in 10 (72%) of the young people who responded to our survey support the introduction of a pop-up warning around gambling harms when buying a loot box

Whilst the introduction of stronger measures such as classifying loot boxes and skin betting as forms of gambling often divides opinion, our research found that there was a much clearer sense of consensus amongst young people that more could be done to clarify the boundaries between gaming and gambling.

Not all the young people we spoke to were opposed to loot boxes and skin betting, with many feeling that they represented a fun, optional activity that they took part in safely. Nevertheless, the majority of the young people we spoke to and who responded to the survey, felt that games developers and platforms could do more to offer in-game items in a more responsible way. They felt that this was an important step in supporting them to make informed decisions around whether to participate in these activities and to recognise the potential harms.

Over seven in 10 (72%) of the young people who responded to our survey support the introduction of self-imposed limits on the amount of money someone can spend on loot boxes in a week or month

One suggestion put forward was the introduction of a pop-up warning when purchasing loot boxes, featuring guidance around gambling harms and signposting gamers towards support where necessary. A majority of young people also suggested measures that would help them to self-regulate their spending on loot boxes, with spending limits and running spending totals suggested as ways in which they could “snap out” of the early signs of problematic behaviour.

## 5. The sports industry to do more to raise awareness of the risks associated with gambling harms

*It [gambling advertising] is everywhere you look when you go to the football. It would probably look weird if it all disappeared now*

16 year old male focus group participant from England

Whilst participants in both the focus groups and the survey were more likely to show open frustration towards the relationship between gaming and gambling, our survey found that more young people see the relationship between gambling and sports as being negative for their generation. They see this relationship playing an important role in normalising gambling as both an individual and a social activity.

Young people want the sports clubs and competitions that benefit financially from relationships with gambling operators, to make a proactive contribution in helping young people to avoid and manage gambling harms. It was suggested that this could include clubs carrying out awareness programmes in schools. Young people felt that this would be a way in which influence that sports clubs have over young people could be used positively, reversing what they see as the current risks associated with the relationship between the two industries.

It was also suggested that the 'influencer' position held by footballers and other sports stars should be exploited, by using well-known figures to front campaigns aimed at young people, around the risk of gambling harms. Young people suggested other similar initiatives, such as the recent Heads Together campaign around mental health involving Prince William and the footballer Peter Crouch, as a template for similar initiatives around gambling.

*The campaign that Peter Crouch has done about mental health has been good. They should do something like that for gambling*

15 year old male from focus group from Scotland

Nearly six in 10 (**58%**) of the young people who responded to our survey support the delivery of gambling harms awareness programmes by clubs sponsored by gambling operators

Nearly seven in 10 (**68%**) young people support the idea of a high-profile media campaign raising awareness of the impact of gambling related harms

# How do we make this change happen?

In order to make the voices of young people heard, RSPH is making the following policy recommendations.

## Raising the Bar – Gambling and Education

### 1. Department for Education to broaden the focus on gambling included in the new Health Education Curriculum and make it a mandatory subject for primary schools

The new Health Education (HE) curriculum, which will be launched in schools from September 2020, states that by the end of secondary school “pupils should know... the risks of online gambling and the accumulation of debt <sup>58</sup>”.

Any focus on gambling is welcome. However, this definition alone is far too vague and narrow to provide teachers with the knowledge and guidance needed to safeguard young people from the gambling-like activity they consider to be most addictive – loot boxes and skin betting. It creates a postcode lottery as to whether a young person is fortunate enough to attend a school that has identified that these issues can be problematic for young people.

It is also risks being too little, too late. Our research has identified that it is 11-14 year olds that are most likely to be buying loot boxes and taking part in skin betting. The current guidance only specifies that young people need to know about online gambling by the time they leave secondary school. It would be inadequate to only begin a conversation with young people about alcohol misuse at 16; the same applies to education around gambling harms.

### 2. Sector experts to develop education programmes for parents and carers on gambling related harms

There is little research available on the extent of parents’ and carers’ awareness of the gambling-like activity undertaken by young people. This is especially true when considering more modern gambling-like activity, such as skin betting and purchasing loot boxes. Through this research, young people have told us that they are concerned that their parents do not know enough about the newer forms gambling-like activity and the harms it can present.

It is particularly important that parents are made aware of what young person perceive to be the potentially addictive nature of activity such as buying loot boxes. An addiction should be seen as a health

and wellbeing issue, not a purely behavioural one. Supporting a young person with a problematic relationship with loot boxes or skin betting is likely to require specialist support from health experts, rather than an approach based on discipline and punishment.

In the absence of further research on this topic, all avenues should be explored to make parents and carers aware of the impact of gambling harms on health and wellbeing. Schools should be supported and provided with materials to introduce these topics with parents and carers, including at open evenings and parents’ evenings. A range of free and accessible educational initiatives, such as e-learning programmes, should also be considered.

### 3. Department for Education to ensure that Mental Health Support Teams are trained to provide support to teachers around gambling harms

The 2017 Green Paper for Transforming Children and Young Peoples’s Mental Health saw the establishment of Mental Health Support Teams (MHSTs) <sup>59</sup>. The role of MHSTs is to support schools and colleges to proactively protect and improve the mental health and wellbeing of students.

This report has identified that young people view gambling as an increasingly normalised aspect of their lives and that they associate gambling harms with a heightened risk of mental health conditions such as anxiety and depression. They have also told us that they would be more likely to gamble at times when their emotional wellbeing is low and that it often driven by social factors, such as peer pressure and participation in group activities such as gaming.

The Department for Education should ensure that MHSTs are aware of the impact of gambling harms and the growing normalisation that young people perceive around gambling and gambling-like activity. The MHSTs would be responsible for proactively supporting schools and teachers around this issue, ensuring that they are provided with up-to-date information around gambling harms and providing signposting services for young people when required.

# Changing the game – Gaming and Gambling

## 1. Department for Digital, Culture, Media and Sport to propose legislation to classify loot boxes and skin betting as legally recognised forms of gambling

The Gambling Act 2005 states that gaming only constitutes gambling when a reward of fixed monetary value is at stake<sup>5</sup>. The many routes to market for the goods obtained through purchasing loot boxes and taking part in skin betting, including being able to ‘cash out’ winnings on unregulated third party sites, means that these items won through a game of chance, have a monetary value.

This is an unregulated and fast-evolving market with no safeguards in place, where items that young people consider to be highly addictive are bought and sold, operating in the back alleys of the internet. The fact that their value is determined by an unregulated online market, only increases the urgency required to address this issue.

In countries where this step has been taken, loot boxes have been taken off the market. We recognise that this may be frustrating for those who consume them safely. However, if games developers wish to offer a product that young people tell us represents an addictive form of gambling, it is their responsibility to ensure that they are doing so with recognition of the potential harms their product can have and with appropriate safeguards in place to manage this.

## 2. Games developers to develop solutions to ensure gamble-free games for children and young people aged under 18

Gambling harms are a significant risk to the health of young people. The same level of rigour and scrutiny applied to shielding them from other risks to health and wellbeing, such as buying alcohol, should be applied to gaming. Online age-verification is problematic and a number of studies have shown that the technology can often be bypassed by children and young people. However, this technology should continue to be explored with real urgency and the lack of an appropriate online age verification tool should not be used as an excuse to do nothing.

A number of organisations such as AgePass and AgeID, have suggested that the limitations of online age verification could be addressed through the sale of physical vouchers that could be bought in shops to

prove a consumer’s age, allowing for measures such as the Think 25 policy to be applied<sup>60</sup>. Without one of these passes being used, games developers should lock certain features in games that have the potential to expose young people to gambling related harms, including loot boxes and virtual in-game casinos.

Recently a number of games have replaced loot boxes with battle passes. This involves a gamer paying a fixed fee and in return being able to access a fixed and transparent list of in-game rewards, through gradual gameplay and completing in-game challenges. It is hoped that developers will continue to take this step in the right direction.

## 3. Games developers and consoles to develop technology to identify problematic spending on loot boxes

The two previous measures are designed to prevent children and young people under the age of 18 from engaging in activity which ought to be classified as gambling. Young people aged 18 and over who purchase loot boxes and other in-game content should be supported to avoid gambling harms, as a form of secondary prevention.

This should include the introduction of mandatory spending limits for purchases of loot boxes and in-game content, as well as banning any spending using a credit card in order to reduce the likelihood of disordered gambling being financed by debt. This should be underpinned and reinforced by the development of a set of criteria to identify problematic in-game spending. This should include spending that is substantially in excess of the original spending limit set by the user, as well as instances where an individual has raised their spending limit repeatedly in a short space of time.

When problematic spending is identified by this criteria, a harms prevention pathway for young people should be triggered. This would include signposting the individual to information, support and guidance from organisations such as the NHS and specialist charities.



## Levelling the playing field – Sports and Gambling

### 1. The Department for Digital, Culture, Media and Sport to propose legislation preventing gambling operators from acting as title sponsors for sports clubs

Young people consider the close and deepening relationship between gambling and sport to be a negative one. Our report has found that it increases the visibility and normalisation of gambling to young people. The safeguards in place to protect children and young people from this exposure are often unreliable and porous. Furthermore, both clubs and operators are developing new arrangements which place them at risk of becoming obsolete, as evidenced by the aforementioned relationships between 32Red and Derby County and Paddy Power and Huddersfield Town.

The visibility that they afford means that high-profile sponsorship arrangements between sports clubs and gambling operators can sweep over the safeguards designed to protect children and young people from gambling harms. At a time where 55,000 children in Great Britain are classed as problem gamblers and we have seen the National Problem Gambling Clinic commission specialist services for 13-25 year olds<sup>4</sup>, the close relationship between the industries is not one should remain unaddressed.

This measure alone would not provide a conclusive solution to the problematic aspects of this relationship. However, preventing young people from watching their heroes representing brands from an industry that they see as representing an increasingly normalised risk to their health, should be the baseline of any public health approach to this issue. This approach to sponsorship has long been applied to other sectors, such as the tobacco industry. It is time that it was used to protect young people from another issue that they see as a real risk to their health.

### 2. Governing authorities in sports to review rules and regulations in light of ‘second generation’ links between sport and gambling

Like many risks to health, the relationship between sport and gambling is one that is constantly evolving. The case studies set out earlier in the report, such as the relationship between 32Red and Derby County, demonstrate that the relationship between gambling operators and the sports industry is moving beyond the simple sponsorship or kits, stadia, leagues and events.

This type of sponsorship arrangement could be considered to represent an example of the ‘second generation’ relationship between gambling and sport, operating at the margins of existing rules and regulations. The fewer the safeguards for minimising exposure to young people, the higher the risk that they will be affected by gambling harms.

Following the introduction of a ban on title sponsorship by gambling operators, governing authorities in sports should carry out a review of the rules and regulations currently in place around sponsorship, to ensure that ‘second generation’ relationships are pre-empted and prevented. This should be conducted with relevant sector experts, who are able to frame such measures within the context of the gambling harms experienced by young people.

### 3. Employers and sports governing bodies to contractually prevent sports professionals from endorsing gambling activity

Our research found that a young person’s peers and role models have a significant impact on their choices in relation to gambling. Sports professionals are expected to demonstrate a range of healthy behaviours. It is time to broaden the definition of healthy behaviours, to recognise the importance of role modelling a healthy and balanced relationship with gambling.

Existing regulation in the UK stipulates that individuals can only advertise gambling products if they appear to be over 25<sup>61</sup>. This is far too narrow and limited to be applied to sports professionals, who are often idolised by young people for the duration of their careers and beyond. A role model does not suddenly lose any credibility when the clock strikes twelve o’clock on their 25th birthday and many sports professionals continue to play well into their thirties.

A legal obligation to not endorse any kind of gambling or gambling activity should be included as a clause in the contracts between sports professionals and their employers. This should be overseen by the governing bodies of their sports, such as the Football Association or the Rugby Football Union. In line with the call made by young people through this research, this should be built upon by professionals supporting educational outreach initiatives to raise awareness of gambling harms.

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December 2019

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