

Carolyn Harris MP
Chair of the APPG for Gambling Related Harm
House of Commons
London
SW1A 0AA

15 October 2020

By email: carolyn.harris.mp@parliament.uk

Dear Ms Harris,

I am replying on behalf of the Safer Gambling Campaign Board to your letter dated 29th September that details your concerns over the Bet Regret campaign – Tap Out advertisement. In responding, I hope it will be helpful to explain the context within which this campaign has been developed.

GambleAware advocates for gambling harms to be understood as matters of health and wellbeing, and that keeping people safe from gambling harms requires a public health response simultaneously delivered on three levels of prevention:

- **Primary prevention** - universal promotion of a safer environment
- **Secondary prevention** - selective intervention for those who may be 'at risk'
- **Tertiary prevention** - direct support for those with gambling disorder or for those who may be directly affected.

A public health response requires action at a co-ordinated series of levels, including national legislation and as well as promoting individual healthy behaviours. Thus, whilst legislation for regulating gambling is principally a matter for government, politicians, and regulatory bodies in discussion with industry, GambleAware works to empower individuals to act for themselves as well as enabling support from local agencies.

GambleAware plays its role by producing and disseminating tools and resources, including www.BeGambleAware.org, delivering prevention campaigns such as [Bet Regret](#), working with trusted intermediaries such as Citizens Advice, teachers and GPs, and by commissioning the [National Gambling Treatment Service](#) (NGTS). Our work is supported by research and evaluation to better understand and promote a safer environment and ensuring our work to support those who are harmed by gambling is effective.

To be clear, the Bet Regret campaign is directed at harm prevention among young men aged 18-34 years who are frequent sports bettors, and as such may be 'at risk' of suffering harm. It is **not** targeted at those with gambling disorder.

Alongside the Bet Regret campaign, GambleAware is funding a separate campaign to drive awareness of the **National Gambling Treatment Service**. This campaign is targeted at those who are high risk or are suffering from gambling disorder and it focuses on the all-consuming nature of gambling. It is being delivered across outdoor, print, radio and digital inventory and quantitative research results are positive in making this target audience aware of support services.

We note the concerns you have raised about Bet Regret, especially from the perspective of those suffering high levels of gambling harms. However, we have undertaken a great deal of consumer research, from strategy development, to creative implementation, to tracking impacts. We have also taken advice from subject matter experts and have engaged in wider stakeholder engagement, all of which have helped to shape and inform the development of the Bet Regret campaign. In addressing your concerns, I have tried to summarise our responses below, which is followed by more detailed explanations. I hope this is helpful:

- In the context that the majority of gamblers do so safely, the specific remit of this campaign is prevention – to encourage moderation, self-reflection and awareness of risks and the use of behavioural 'nudges'.
- Research consistently shows that, in engaging with this audience, references to cessation, disordered gambling, or treatment services leads to 'othering' – gamblers simply opt out: 'this is for people with problems, not me'.
- We (along with others) are engaged in other activities, such as commissioning the National Gambling Treatment Service, which are aimed at helping those who already experience gambling disorders and which we are promoting through our ongoing campaign to drive awareness and contacts for the NGTS.
- The betting app is how the majority of sports bettors gamble. Any effective communications intervention has to work within this reality. The desirability and design of apps more broadly is a regulatory issue.
- The 'Tap Out' intervention is a behavioural tool which we are encouraging bettors to adopt while in a 'cold' state, embedding a behaviour that becomes the norm and reduces the chance of them entering the 'hot' state which we know can affect the decision making process. Our detailed development research (including user trials) shows that many bettors find the 'Tap Out' heuristic useful and are prepared to use it (and we are now tracking its adoption in market).
- Gambling operators (and broadcasters) have been prevailed upon by DCMS to provide funding but our governance structure is designed to ensure complete independence from the industry, who are informed of plans after they have been set as a courtesy but have **no** involvement in decisions on campaign development.

- 1) **Bet Regret is part of a public health campaign:** This campaign has been devised to address an overall public health policy stated in 2017 to prevent risky impulsive sports betting behaviours that result in harms. As such, the campaign objectives are to encourage **moderation** and to promote safer gambling behaviours, rather than cessation of gambling. In this regard, this is a **prevention** campaign to prevent harm amongst those who are not currently experiencing gambling disorder – and is **not** targeted at those suffering from gambling disorder. The campaign target audience is defined as frequent, (those who bet two times a week or more) male sports bettors aged 18-34 years old.

Any message that directly instructs this audience to stop gambling is rejected by bettors and has been evidenced by detailed quantitative and qualitative research, alongside a consultation process with academics and behaviour change specialists in the early planning phase of the campaign – see <https://about.gambleaware.org/media/1767/item-5a-blaszczynski-gainsbury.pdf>. This review – and multiple stages of consumer research supporting campaign development – concluded that messages that focus on gambling harm lead our audience to dismiss the message as not relevant; is ‘not for people like me’ or is ‘just for people with a problem’. In this respect, to add in links to GamStop, NHS, Gamban, or indeed the Helpline, would simply lead to our specific (non-problem gambler) audience to opt out or ignore the message. Instead we need to engage our football-loving audience with a relevant message that they can relate to and in doing so, motivate them to moderate their behaviour. Meanwhile all the assets include the URL to our landing page (www.begambleaware.org/betregret) and includes tips and tools as well as the helpline.

- 2) **Tap Out – Encouraging time out instead of gambling cessation:** As above, this campaign is designed to help frequent sports bettors cut down by avoiding risky, impulsive bets and therein encourage them to moderate their betting behaviour. Any messaging which conveys that bettors must stop gambling is rejected, and indeed is the role of regulation rather than a prevention campaign. Whilst no specific time frame is provided, the TV is supplemented by direct (digital) communication which contains much simpler messaging and includes the word ‘**Always**’ to encourage the habit. For this audience, a direct cessation message is likely to be rejected, and deemed to be ineffective. Our development research, including user trials, showed high potential for the behaviour to be adopted, help reduce the number of ill-considered bets being made in the heat of the moment, and contribute to moderation and the reduction in risk of harms overall.
- 3) **Once betting in app, is the Tap Out action meaningless?:** Here we are asking people to delay decision making to ensure sure rational and considered decisions, thereby adding friction to an otherwise frictionless journey. As a result, we needed to deliver the message in a way that grabs attention and motivates them to adopt the behaviour. In other words, to make it appealing and engaging, not negative

and nagging. This campaign was researched at three stages during the creative development and production process. At each stage it received a highly positive response with impact, differentiation, appeal, relevance, comprehension, and motivation marked as 'high' (Outsiders Research).

In a two-week trial, 44% of participants used the Tap Out technique each time they considered placing a bet, 52% about half the time – and feedback was overall very positive:

"I come off the app for maybe 5-10 minutes to finish cooking a snack or something, just to take my mind off the sport and then go back to the app and think that maybe this bet isn't so sound. I don't have that instant regret"

"I definitely will be using this app in the future because I feel that it's been saving me from using money unnecessarily".

"Sometimes you put the app off, go and do something else and you actually forget to put it (the intended bet) on".

We acknowledge that any action is more difficult to address when in the 'hot state' and ideally would require the operator to implement a technical interruption – for example a pop up within app asking people to reconsider placing a bet, and whilst we cannot mandate for this, we will work with the industry to encourage this. What our campaign aims to do is to embed a behavioural mechanism amongst the target audience who, importantly, are not yet experiencing gambling disorder. The argument that gamblers are already in a 'hot state' of decision making when entering a betting app is based on evidence which suggests that activity in the ventromedial prefrontal cortex of the brain is reduced amongst those who do have a gambling disorder. However, it is important to note that this 'hot state' may be entered following the outcome of a bet, rather than during events which precede placing it, and that gamblers not experiencing gambling disorder may not be in this 'hot state' at all. This is particularly true for the group we are aiming to reach who define themselves as bettors with skills as opposed to gamblers. This is why it is so important to invest in preventative action, embedding behavioural mechanisms to maintain 'cold state' decision making and therefore reducing potential gambling harms.

4) Industry involvement with the Bet Regret campaign: In October 2017, when launching a consultation as part of a wider policy review, DCMS announced a new responsible gambling campaign to be funded by the industry and broadcasters, but to be delivered independently by GambleAware. The published consultation document states:

5.84. GambleAware, broadcasters and gambling industry groups have drawn up proposals for a major responsible gambling advertising campaign, to run for two years with a budget of £5-7 million in each year. This will include television adverts, including around live sport, as well as radio, cinema, print and online. The scale is equivalent to or larger than the scale of a major Government public awareness

campaign. The aim will be to raise public awareness of risks associated with gambling, as well as signposting to further advice and support where necessary.

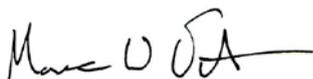
5.85. Proposals for the campaign involve new funding from online gambling operators, with airspace and digital media provided by broadcasters. The bodies which are members of the responsible gambling group, Senet, will continue to fund its existing messaging and responsible gambling advertising work but bring this in line with the wider campaign. We would encourage others who benefit from gambling advertising, including social media platforms and sports bodies, to look at how they can contribute to raising awareness of the potential risks.

5.86. GambleAware will lead the campaign, ensuring the content is independently approved and meets the campaign objectives. It intends to set up a Campaign Board and Delivery Unit, appointing an independent chair of the Board and approving all campaign content.

The Safer Gambling Campaign Board is chaired by Professor Sian M Griffiths who is highly regarded for her work in public health including public health campaigns. Other board members include Sheila Mitchell, recently retired from being Marketing Director for Public Health England; Professor Marcantonio Spada, Professor of Addictive Behaviours and Mental Health at London South Bank University; Teresa Owen Executive Director of Public Health for The Betsi Cadwaladr University Health Board and myself. No industry members are board members. Brigid Simmonds (Chair of the BGC) has attended three board meetings but in observer capacity only. The campaign has been funded by the industry with donations of £3.9m in 2020 and £3.8m in 2019 alongside broadcast media inventory donations accruing to £1.6m per annum to cover two bursts of activity. However, at no stage has the industry contributed to the campaign development or implementation.

I hope that the above addresses your comments sufficiently. The Bet Regret campaign is being fully evaluated and another wave of the Ipsos MORI Tracking Study will be carried out at the end of the current burst (early November) to assess the campaign performance against KPIs on campaign recognition, knowledge of the technique and claimed adoption. At this stage, we will then review campaign performance against the agreed the policy objective. In the interim, if you would like to discuss this in any more detail or any other issue relating to our work, I am more than happy to arrange a Zoom call to do so.

With kind regards



Marc Etches
Chief Executive