An Integrated Approach To Safer Gambling

*A roadmap for how the industry can prevent gambling harm

REVEALING REALITY
Acknowledgements

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Five operators from across a range of sectors took part in the full innovation programme throughout 2019–20 - Gamesys, Genting Casino, 888, Buzz Bingo and Betfred.

The Behavioural Insights Team was commissioned by GambleAware to provide advice on evaluation design, data collection and analysis. A report detailing the Impact and Process evaluations will be published independently in early Spring 2021.

We would also like to thank the many players who took part in the customer research and user testing phases of the project, whose input helped ensure all interventions were rooted in customer perspectives.
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Executive summary

Why we need a fresh approach to safer gambling

Everybody agrees we need to prevent gambling harm, not just react to it

Safer gambling interventions and messages are supposed to equip people with the knowledge and ability that enables them to remain in control while gambling. Everyone who was engaged throughout this project, across the industry, regulatory network, academia and customer base, agrees with this premise.

Should people experience gambling related harm – significant financial loss, harm to their relationships, anxiety and stress – they need to be offered support. But this is clearly too little, too late. Gambling should be a safe, enjoyable activity. Operators should be aiming for the prevention of these problems, not just reactive intervention once they occur.

Safer gambling efforts should be, in the main, preventative. This means that safer gambling needs to become the default way to play at all times.
“The Gambling Commission has been really clear that we want everyone to work together to seek to make gambling safer. And by that we mean having much more of a focus on trying to prevent gambling harms happening in the first place.

There’s been lots of great work done over the years, but often that’s been focused on trying to reduce those harms after they’ve already happened. We’re challenging the industry, ourselves and others, to try and focus on making those measures much more upfront, so we can actually stop those harms from happening in the first place.”

**Tim Miller,**
Executive Director
Gambling Commission
Friendly Advice

STAYING IN CONTROL

The Golden Rules of playing Poker Machines

- Playing machines is being fun. SET LIMITS on how much you will spend.
- Set LIMITS on how much you will spend.
- Play within your means can be fun and exciting.
- Excessive gambling can cause problems for yourself and others.

GamCare: 0800 8020 133

PLAYING THE MACHINES

STAYING IN CONTROL

ALLERGENS AND CHANGES
Existing interventions are consistently outgunned by the rest of the gambling customer experience

Most operators do offer some messaging and interventions that aim to prevent harm. Many of these have been developed and validated by academic institutions, and some are even statutory requirements. The challenge is that these interventions sit within a complex ecosystem of marketing, design and communications developed by gambling operators with the primary aim to sell their product; to encourage people to gamble. The entire environment has been engineered with that in mind.

In this context, it should be no surprise that these individual and isolated safer gambling efforts do not have the impact hoped for.

Operators need to take responsibility for integrating safer gambling into everything they do

There is never going to be a ‘silver bullet’ message or solution to making gambling safer for everybody. Even the most refined and robustly evidenced message will fall short once it is out in the real world, drowned out by competing sales efforts. Equally, even the best message would quickly date and become part of the ‘wallpaper’ for customers.

It is the responsibility of the industry itself to rebalance the scales and integrate a safer gambling approach into everything they do. Every touchpoint, communication and design decision should have safety incorporated into it, rather than considered as an add-on.

This report sets out a roadmap for how the industry can prevent gambling harm

This project builds on evidence that operators need to do far more to embed safer gambling into everything they do. This report represents the second phase of a four-year programme of work designed to change the way the industry approaches safer gambling.

In 2017, we released the report Responsible Gambling: Collaborative Innovation, Identifying good practice and inspiring change. In it, we explored what safer gambling communications could and should look like if it were to be more effective at preventing people coming to harm in the long-term.

This work shows how safer gambling efforts should be:

- Proactive & inclusive
- Integrated
- Impact-focused
- Empowering
- Continuously improving

It also became clear that while many operators have highly skilled marketing, creative and product design teams, safer gambling efforts rarely benefit from this expertise. The operators involved expressed a desire to find a way to bring their best talent together with their ambition to improve safer gambling.

This report represents ‘phase 2’ of this work, working collaboratively with operators on their commitment to make these ambitions a reality.

1 Responsible Gambling: Collaborative Innovation Identifying good practice and inspiring change
2 Ibid
Five operators took part in a collaborative innovation programme, proving what can be achieved when they apply the creative skills they already hold to safer gambling

The overall aim of this project was to build capacity amongst operators to develop effective messaging to prevent gambling harms. Revealing Reality worked collaboratively with operators to demonstrate and share more widely with the industry and other stakeholders what safer gambling messaging is possible and feasible for operators to produce, implement and test in their own spaces.

The objectives were to:
- Prove the industry is able to create quality safer gambling messages (i.e. based on a sound premise and behaviour change theory)
- Improve industry knowledge around good safer gambling message development, both in theory and practice
- Identify and share best practice in operator-led message development and testing
- Identify and share a range of evaluation opportunities that would enable operators to evaluate the effectiveness of their interventions
- Produce recommendations for larger scale messaging development

Five operators from a range of sectors took part in a 9-month programme of innovation, development and delivery, designed and facilitated by Revealing Reality. The participating operators were Betfred (both retail and digital), Genting Casino, Buzz Bingo, Gamesys (Jackpotjoy brand) and 888 (Casino brand). The programme ran from autumn 2019 to summer 2020.

Despite some disruption due to COVID-19, all five operators were able to develop and implement safer gambling interventions that took steps towards the stated aims: preventative, pro-active and integrated with their existing brand. Details of all the interventions can be found in Section 4: Operator case studies.
Project findings:

This report is both a call to action and a guide for anyone seeking to make gambling safer

This project set out to establish whether operators could be supported to develop better safer gambling strategies; preventative, creative and integrated with the gambling experience. We found that with the right tools and support, they can achieve significant positive steps.

The design principles in Section 2: How to develop an integrated safer gambling approach were found to be empowering for participating operators, enabling them to unlock skills and creativity within their organisations.

This project has shown that operators are able to apply new approaches to the design and development of safer gambling communications and interventions which are a marked departure from how safer gambling has previously been conducted.

Drawing on what the project found, this report sets out recommendations for how the rest of the industry can take similar steps.

Design tools

Tone of voice:
You’ve got a strong brand, use it

Project findings: Operators were able to capitalise on the investment they had already made in their product branding by using it to engage customers with safer gambling.

Touchpoints:
Use every opportunity to engage your customers

Project findings: Operators used a wider range of touchpoints across the customer experience than they had previously to engage customers with safer gambling.

Changing behaviour:
Motivate and enable customers to remain in control

Project findings: Operators drew on behaviour change theory to design their interventions, making safer gambling easier and more appealing for customers.

Setting targets:
Identify the behaviours you want to change

Project findings: Operators used a range of measures, beyond simply exposure to a message, to track the effectiveness of their interventions, particularly patterns in play, spend and time.

Don’t undermine your efforts:
Be consistent across your customer experience

Project findings: Operators sought to present a consistent safer gambling message, but there remain big challenges in reshaping the wider gambling environment to align with these messages.
This report has been written for operators but moving towards a more pro-active and integrated safer gambling approach will require wider collaboration. Anyone across the industry, regulatory, research or customer community can use this report as a foundation for how we want gambling to look in years to come. We hope that a range of audiences can take away useful ideas and inspiration.

For Operators

if you are committed to making your product safe and enjoyable for all your customers, this report shows you how to use the skills and approaches you already hold to do so. In order to take safer gambling seriously, you need to be using all the tools outlined in this report to make this a reality.

For Regulators and Researchers

if you wish for the industry to take greater responsibility for making gambling safer, we must commit both to working collaboratively and holding them to the standards laid out in this report.

For People Who Gamble

if you want to enjoy gambling safely, this report can show you what to look out for when choosing who to give your money and custom to.
“Importantly, this has been based on working with real gambling companies and real customers, trialling real messages in the real world. This isn’t a dry academic report – this is drawing upon the experiences of consumers and using those experiences to make gambling safer for everyone.”

Tim Miller
Executive Director
Gambling Commission
Why we need a fresh approach to safer gambling
Safer gambling efforts should be preventative as well as reactive

Everyone across the industry agrees that gambling should be a safe, enjoyable activity. People who gamble should be in control, self-aware and should not be encouraged to play in a way that they may regret.

It is easy to think of ‘problem gambling’ as a discrete issue that a minority of players experience. While there is a threshold beyond which we consider someone to ‘have a gambling problem’ or disorder, it is not true that everybody else is always safe. There is a broad spectrum of harmful gambling and negative impacts and we should be seeking to reduce these for all people, not just for whom it has reached a particularly damaging point.

To have the greatest impact, the majority of effort and investment should be made to prevent gambling harms from occurring. Our primary goal should be to treat the problem, not the symptom.

This does not mean that the industry is not obliged to provide support for those with a gambling disorder or who are suffering harm. Should prevention fail, the industry has a responsibility to signpost people to (and fund) support for the harms that their product has facilitated.

This report sets out a vision for a gambling sector where fewer people require this type of intensive help, because fewer people suffer from the harms in the first place.

There is consensus that operators could do more to prevent gambling harm

All operators that were consulted during this project reported that they wanted to do more to prevent harm and acknowledged that their current approach to safer gambling fell short of this aim.

Operators said that preventing harm was a core part of their long-term strategy, not only because of the moral argument but because they believe it will result in more sustainable relationships with their customers and better business outcomes over time.

The Gambling Commission agrees that more of a focus on prevention is needed and that current efforts are too focused on helping customers once harm has already occurred.

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3 We are referring here to the diagnosable condition “problem gambling”, as recognised by the Royal College of Psychiatrists, in contrast to gambling harm as described by the Gambling Commission, which covers a far broader set of experiences that are not diagnosable in the same clinical sense.

4 Gambling Commission: National Strategy to Reduce Gambling Harms
Most safer gambling efforts are not aimed at prevention. Those that are get lost in a sea of competing messages, all engineered to encourage customers to gamble.

When mapping out the typical ‘customer experience’ across operators, the majority of safer gambling messages appear once risk of harm has already been identified. Most digital operators have ‘triggered’ interventions when a customer’s behaviour is showing warning signs, and in venue, staff are required to intervene only once a customer is displaying troublesome signs of distress or compulsion.

Messages that appear throughout the customer journey are usually targeted at customers who are already experiencing harm. For example, there are posters and leaflets that remind people of the “warning signs” of a “gambling problem” or signpost them to services like GamCare or self exclusion programmes.

However, most customers do not self-identify as having a “gambling problem” and so immediately discount these messages as not being relevant to them.

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5 Responsible Gambling: Collaborative Innovation Identifying good practice and inspiring change
6 Appendix 2: Summary of Customer Research
7 For the vast majority gambling is a journey – people rarely experience significant gambling harm the first time they play. Even people who go on to experience the most serious gambling harms may have spent a long time playing without experiencing harms or being considered ‘at risk’. People are also able to move in and out of harmful states. All customers are somewhere on a broad journey, and at any one point it is not possible to determine exactly who may experience harm in future. (For example, see Reith, G & Dobbie, F: Gambling careers: A longitudinal, qualitative study of gambling behaviour. Addiction Research and Theory, October 2013; 21(5): 376–390.)
"I think it’s a good idea, but I don’t have a problem so I wouldn’t read them [safer gambling leaflets]”
Dan*, 37, Customer research participant

“I don’t use it [deposit limit setting] because I don’t get to that point, but it’s there if I need to”
Jill, 43, Customer research participant

Many operators do make efforts to place preventative messages somewhere in the customer journey. The presence of limit setting functions intends to give customers a tool to prevent problematic behaviours from emerging. The ‘When the fun stops, stop’ message is designed to help customers monitor their own behaviour and avoid potentially problematic outcomes. Customers are often asked to “please play responsibly” at the bottom of a webpage or app.

The challenge is that these preventative messages make up a miniscule proportion of the gambling environment, on or offline. These are organisations with sophisticated marketing and creative capabilities, who are constantly engaging with their customers. When you consider every message, communication and design decision that is made across a gambling customer experience, the overwhelming majority are intended to encourage customers to gamble.

As a result, active efforts to prevent people experiencing gambling harm are consistently and decisively outgunned by the surrounding messages, all engineered to engage customers with gambling and persuade them to play in a way that suits the operator.

This is exacerbated by the fact that safer gambling messages are usually presented in a distinctly different tone and brand from the rest of the gambling experience. What may be a well-intentioned effort to help messages stand out can often lead to customers ignoring or dismissing safer gambling messages, as they are perceived as a ‘tick box’ exercise by the operator.

“They send the email because they [have] to, not because they wanted to and actually care”
Kamran, 26, Customer research participant

“[Safer gambling messaging] feels statutory – it’s not good for the business model of the casino”
Archith, 34, Customer research participant

8 Please note, all names of customer research participants used throughout the report are pseudonyms.
9 Responsible Gambling: Collaborative Innovation Identifying good practice and inspiring change
10 Ibid
“One of the things this project made us crystallise in our minds is that a normalisation of responsible gambling tools and information is the way to go in order to touch as many customers as possible – long before they get into any space of harm.”

Yaniv Schwartz, SVP Customer Risk Management, 888 Casino

Preventing people from harm requires a different approach, and a different toolbox

Safer gambling should be the default way to play

When we get in a car, we put on a seatbelt without a second thought. To drive without one would feel like a conscious decision to put ourselves at increased risk. Wearing a seatbelt is a normalised part of driving. Everyone does it, even if they think they are a good driver.

When we gamble, we should do so safely, by default and without effort. Engaging with safer gambling messages, tools and interventions should be a seamless part of the gambling experience, as easy and natural as putting on a seatbelt. It should be easy to play safely, and uncomfortable to opt not to.

During this project, operators reflected on what this might mean in each of their businesses. When they explain how to play at a roulette table, or an online slots game, those instructions should have safer gambling integrated into them. When a customer first signs up to an online betting platform, their welcome email should reinforce expectations that the customer will engage with safe behaviours, tools, norms.

Operators must rebalance the scales and rethink every single touchpoint with their customers:

- Gambling in a safer way should be normalised across every communications touchpoint with customers
- Safer gambling efforts should be distributed across the entire customer journey, from sign-up through to withdrawal of winnings
- All communications should use the power of an operator’s brand and tone of voice, not only those designed to encourage gambling

The industry already has the marketing, design and digital skills required to make this a reality

In a highly competitive sector, the industry already invests significantly in its creative and communications capabilities. These skills are applied to acquisition, retention, maintaining high levels of customer satisfaction and the promotion of products, special offers and deals.

The operators who took part in this project have spent years developing and optimising their unique brand and tone of voice that appeals to their customer base.

Fast, iterative ‘A-B testing’, customer research and sophisticated data science are also all being used to continually improve each organisation’s ability to engage with players.

Operators recognised that currently, the efforts of these teams are oriented almost exclusively at encouraging people to gamble.

For safer gambling messages to have any chance at success, operators should apply the same level of skill and effort to preventing gambling harm as to encouraging customers to play.
Moving towards an **integrated** safer gambling approach

Marketing teams across the sector will be familiar with the idea of ‘integrated marketing’. The participating operators in this project recognised how their businesses used integrated techniques to engage customers.

Integrated marketing is deployed when the communications environment is complex and fragmented. It uses all available channels and touchpoints to deliver a consistent, seamless and customer-centric experience.

With an integrated marketing strategy, there are no ‘bolt on’ messages that sit outside of the overarching brand message. Every touchpoint is geared towards reinforcing the same marketing objectives.

**Safer gambling should be integrated with every organisation’s brand strategy**

The principles of integrated marketing should be applied to safer gambling. An integrated safer gambling approach makes use of every touchpoint to reinforce and normalise safer gambling behaviours.

From a customer’s point of view, all aspects of the brand experience should be making it easier and more natural to gamble in a way that is safe. Throughout the project, operators were able to build up a clear picture of what an integrated safer gambling strategy does, and does not, look like.

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**An integrated safer gambling strategy**

<table>
<thead>
<tr>
<th>Is</th>
<th>Is not</th>
</tr>
</thead>
<tbody>
<tr>
<td>Integrated across all operator touchpoints, at all points of the customer journey</td>
<td>Only presented in a small number of touchpoints across the customer experience</td>
</tr>
<tr>
<td>Preventative rather than reactive</td>
<td>Only targeted at customers once they have shown signs of problem gambling</td>
</tr>
<tr>
<td>Framing safer gambling as the default way to play for all customers</td>
<td>Outweighed by competing sales and marketing messages</td>
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<tr>
<td>Presented in the brand and tone of voice of the operator</td>
<td>A single, ‘silver bullet’ message</td>
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<tr>
<td>Continually evolved in line with emerging insight and iterative testing</td>
<td>Undermined by contrary messaging elsewhere in the customer experience</td>
</tr>
<tr>
<td>Alongside more statutory reactive support such as signposts to GamCare, self-exclusion programmes, etc.</td>
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</table>
This project demonstrated that operators have both the skills and desire to pursue an integrated safer gambling strategy

All operators that took part in the project said that an integrated safer gambling approach aligns with their long-term goals.

All operators said that the prevention of harm was a moral obligation and a business objective, producing a more sustainable and trusting relationship with customers.

All operators stated that they intend to continue to use the approaches, tools and skills that they gained throughout the duration of the project.

“The vast majority of our players take pride in being responsible. They want to be supported in their positive choices rather than being constantly warned of the dangers of being irresponsible. That’s why we have overhauled our tone of voice and strategy when it comes to the preventative side of safer gambling. Safer gambling messages now sit alongside other messages from the brand and have become part of the day-to-day conversation we have with our players.”

Rose Tomlins
Head of Brand & Consumer Insight, Gamesys

The five operators who participated in this project took steps towards an integrated safer gambling approach

The interventions and communications developed by the participating operators drew on a wide range of the principles and approaches explored in this report (see ‘How to develop an integrated safer gambling approach’ section).

However, it is important to note that the interventions and trials put in place do not themselves represent fully realised integrated approaches to safer gambling. There was never the expectation that operators would be able to fully adopt all of the ideas within this single project. Instead, the project aimed to encourage operators to do something different, and take a first step towards a more preventative approach.

They are valuable examples of the principles of integrated safer gambling being put into practice and are shared here to show what many of the individual elements required to create an integrated approach can look like.

Full case studies can be found later in the report in Section 3: What can be achieved by taking an integrated approach, but summaries are provided below.

The detailed data and findings from each operator evaluation have been independently analysed by the Behavioural Insights Team to determine the relative effect of each intervention. Their Impact and Process evaluation reports are published separately, but where data was evaluated by the operator we have included summaries of their findings at points throughout this report.

11 The Impact and Process evaluation reports will be published in early Spring 2021
Gamesys

To encourage safer gambling behaviours across their whole customer base Gamesys developed the #Sharethejoy comms campaign. #Sharethejoy was developed and deployed by the marketing team using the same processes they would on any other promotional campaign. The intention was to:

“More naturally integrate [safer gambling] messaging within brand campaigns and communications to players”

Rose Tomlins
Head of Brand & Consumer Insight, Gamesys

The #Sharethejoy campaign developed by the team aimed to encourage players to strike a balance between their time on and off the site by actively encouraging people to take breaks, consider how to spend their time not playing and think about how they should spend any winnings rather than continuing to play. The key integrated elements the Gamesys team focused on were using a tone of voice consistent with the rest of their playful and community-focused brand and using multiple touchpoints to put consistent messages in front of their customers through everyday comms channels.

The #Sharethejoy campaign was discontinued and indefinitely postponed after only a few days, following the COVID-19 lockdown in March 2020. Some integrated principles were adopted across Jackpotjoy’s activities during the following months.

Betfred (digital)

The Betfred Digital team ran a communications-focused intervention targeting a wide range of customers, including those considered ‘lower risk’. The key aim for these communications was to increase players’ self-awareness of their gambling activity – as recommended in this report. To try and land these messages successfully with their customers, the Betfred team employed a change in tone from their normal safer gambling content, and utilised new touchpoints previously unused for safer gambling-focused comms. A combination of email, SMS and the inbox embedded in the website and app were used to reach players directly.
Betfred (retail)

As part of this project the Betfred Retail team engaged their marketing team to help develop new safer gambling messages that could be integrated directly into advertising and marketing materials. The materials in question were developed for the Cheltenham and Aintree festivals in March and April 2020. These updated materials included short, simple slogans that were tested with Betfred customers and were trialled in 20 stores. With the marketing team on board, the resulting materials looked markedly different from the separate safer gambling resources usually displayed in stores.

The target audience was broad, and the communications were designed to be relevant for all land-based retail customers. The team also had a particular target audience of new, first-time players in mind.

The commitment from Betfred to test the new campaign over Aintree and Cheltenham demonstrated the enthusiasm the team had in this new approach and the buy-in they were able to secure internally.

While the creatives were put up in the trial stores, the COVID-19 lockdown on March 23rd, 2020 meant that the intervention was not in place long enough to be trialled fully.

Buzz Bingo (digital)

The Buzz team focused heavily on how they could include consistent safer gambling messages at many more points in the customer journey and on making access to tools and information simpler. Where previously customers had to seek out tools on the responsible gambling tab, the intervention introduced permanent additions to their homepage menu and a set of action-triggered prompts at different points of the customer journey. This made safer gambling messaging more visible and reinforced it across the customer experience.

While only the first step towards a totally integrated approach, the principles employed by the Buzz team aimed to normalise the use of tools in the long run. The marketing and digital teams worked on the feel of their interventions, ensuring that they were ‘soft’ enough to feel closely integrated with the wider Buzz brand, and that all language was positive and inclusive.
As part of this project the 888 team ran two workstreams.

One was a discrete intervention that aimed to increase uptake of the deposit limit tools on the 888 Casino website/app and normalise the idea that setting a limit is expected by inserting it into the normal customer journey. This is an example of the kind of interventions an operator could include in a fully integrated safer gambling approach.

The second workstream, development of the 888 Control Centre, provides players with an area on the 888 Casino site and app where they can see data about their play over time and access a series of safer gambling tools. Giving players greater access to their data aims to increase self-awareness of their actual behaviour, a key component for building long-term safer gambling habits and behaviours. The Control Centre was also designed to sound, look and feel like a settings page on any other website, rather than something explicitly about safer gambling. The neutral name ‘Control Centre’, for example, was chosen over alternatives like ‘Safe Zone’.

The Genting team developed and implemented several new customer communications as part of this project, utilising new touchpoints in the retail and digital customer journey. In casinos they rolled out new messages on gaming machines and even used the ATM display as a new opportunity to deliver a safer gambling message to customers. Affordability and safer gambling emails to customers during COVID-19 employed a more casual, friendly tone than had been used in safer gambling communications previously, hoping to engage more effectively with the audience.

Due to the COVID-19 lockdown on March 23rd, 2020 the Genting team were only able to collect very limited data on the retail interventions.
How to develop an integrated safer gambling approach
Your toolkit for an integrated approach

Based on a wealth of previous safer gambling research and the learnings from this collaborative project, we have set out a toolkit for how every operator across the industry can develop their own integrated safer gambling strategy.

The toolkit contains five design principles for an integrated safer gambling strategy.

Nothing across these pages is new. Each design principle takes cues from marketing practice - something all operators have experience of.

The operators found these principles empowering and often intuitive, as they align with many of the wider activities of the business outside of safer gambling. Many of them simply require using the skills and knowledge the business will already have.

Different elements of the toolkit were tried and tested by the participating operators and their experiences have shaped our recommendations. These experiences are highlighted throughout.

“It was challenging at first, but once we got into it there was a lot of enthusiasm within the team to do this kind of messaging”

Kevin Purnell
Head of Retail Compliance, Betfred

We know that the industry has the will to better protect customers by making safer gambling the default and relevant to all. This section provides the means to achieve this. Operators should no longer be able to say they do not know what to do.

Questions for operators: Is this toolkit for you?

› Are you committed to making safer gambling relevant and effective for all your customers?

› Do you have experience of marketing and of running an effective business?
Tone of voice: You’ve got a strong brand, use it

As an operator, you have probably invested significantly in building a brand and tone of voice you use to engage customers. But are you using it to encourage and enable people to play more safely?

How messages are framed is central to overcoming the fact that safer gambling communications often feel separate and less relevant than wider marketing. Safer gambling comms need to appeal to customers in the same way marketing does, and an operator’s brand and tone of voice is a key part of that.

Use the brand – its tone, feel and look – to package safer gambling messaging and interventions.

Use language that aligns with how you usually talk customers – being inclusive and framing things positively should help messaging and interventions to go from irrelevant to appealing.

Touchpoints: Use every opportunity to engage your customers

Each touchpoint you have with a customer – online or in person – is an opportunity to introduce, reinforce, support, or enable a safer gambling behaviour. From a marketing perspective they are all an opportunity to develop a relationship with the customer or encourage certain behaviours, an integrated safer gambling approach will use them in the same way.

Gaps where there are currently no safer gambling messages are an opportunity to include them, and places where other marketing and promotional messages exist are an opportunity to adapt what is already there.
Changing behaviour: Motivate and enable customers remain in control

There is a wealth of insight available on how to change customer behaviour. Marketers and behaviour change experts have spent decades establishing best practice ideas for how to nudge customers.

At its core, much of this work points to two key levers you can pull – motivation and ability. Safer gambling messages should aim to make safe behaviours more appealing (increase motivation) and easier (increase ability).

For safer gambling to be motivating – it must be socially normal, aspirational and associated with status.

For safer gambling to be easy – players need to understand how the games work, be self-aware of their own play behaviour, and have tools and strategies for staying in control. Engaging with safer gambling interventions should be seamless and frictionless.

Set targets: Identify how you will measure safer gambling change

Any business leader or manager will say that setting the right KPIs is essential to creating change in large organisations. Getting them wrong can lead to damaging unintended consequences.

The KPIs that are used to develop, evaluate and iterate on safer gambling messages are equally crucial to achieve genuine change. They enable an operator to:

- Align everybody in the business behind the same targets
- Publicly state their safer gambling objectives and promote accountability and transparency
- Demonstrate positive impact and progress

Building a “logic model” for how safer gambling messages are expected to create the desired change can help identify both problems and opportunities with the strategy.

Don’t undermine your efforts: Be consistent across your customer experience

If safer gambling is to be effective, it cannot be outgunned by competing sales messages that fail to reinforce, or in some cases undermine, the desired safer gambling behaviours.

A truly integrated safer gambling strategy means that the desired behaviours are reinforced at every touchpoint, across the entire gambling environment.

This means the changes you need to make might involve removing or changing sales messages, as well as introducing new safer gambling messages.

To identify these potentially undermining influences, operators need to understand the biases and heuristics that players use to interpret the world around them. A gambling environment will inevitably be influencing people to play in a certain way, such as nudging them to place higher stakes, underestimate their spend, or misunderstand their likelihood of winning.
Tone, language and branding:
You have a strong brand, use it

The operators participating in this project found that changing the tone, language and branding of their safer gambling messages was one of the easiest changes they could make to safer gambling interventions.

Key learnings from the project

Safer gambling messages should not feel distinct from the wider customer experience

Safer gambling messaging and interventions tend to feel separate to the wider customer experience or get drowned out by competing messaging.

How messages are framed is central to overcoming this challenge. To appeal to customers, interventions and messages need to feel consistent with other communications in the gambling environment.

Making this happen is straightforward. Operators already have powerful means of appealing to customers – they simply need to use these when designing safer gambling interventions and messages.

All the operators participating in this project have a distinctive brand(s). This is not unique: most gambling businesses have one or more strong customer facing brands, underpinned by huge amounts of pre-existing research, strategy and investment.

Using this branding – its tone, feel and look – to package safer gambling messaging and interventions is the best way to make safer gambling feel like the default option to customers. Adopting language around safer gambling that aligns with how you usually talk customers – being inclusive and framing things positively – helps messaging and interventions to go from irrelevant to appealing.

“Responsible gambling content was traditionally ‘silenced’ within the business. Unlike other content on the site, it was not always developed in collaboration with the brand team. This led to RG content often taking on a more compliance or legal tone of voice that was not in keeping with the brand and as a result, did not always feel relevant or interesting to players”

Rose Tomlins
Head of Brand & Consumer Insight, Gamesys

You have already invested in developing a tone and brand that your customers love and trust

Your brand is the strongest tool you have to engage customers – it’s part of what drew them to you in the first place, and it’s what they’re familiar with in day-to-day play.

Using your brand is key to integrating safer gambling more closely and consistently into the customer journey. The closer safer gambling messages feel to the brand, the less customers will dismiss them as ‘not for me’ or ‘just a box-ticking exercise’. It will simply become part of the gambling experience.
View from customer research:
Safer gambling content being seen as separate/divorced from operator’s brands is a consistent finding when speaking with people who gamble.
During the customer research and comms testing conducted with people who gamble during this project, consistency with brand came out as an important factor. When safer gambling activity was noticeably off-brand, it was considered less sincere. This impacted how people thought about the brand they were playing with, and how seriously they thought the operator took safer gambling. Starkly different tone and branding does make safer gambling communications stick-out, but not necessarily in a positive way – it is much easier to ignore if it does not feel relevant to you.

Reflecting on the importance of branding, tone and language, the contrast between other marketing content and safer gambling communications was often stark, and the participating operators saw immediate value in addressing this:

“I hope [this report] will see more brands integrating safer gambling messaging into their day to day communications with players. For that to be truly effective, safer gambling messaging must be treated with the same love and care as an above the line campaign. If it doesn’t fit with the brand look and feel and tone of voice, it’s going to feel like a half-hearted, box-ticking exercise that lacks sincerity.”

Rose Tomlins
Head of Brand & Consumer Insight, Gamesys

The participating operators all felt that emphasising the safety of their brand to customers was important and the participating operators saw immediate value in addressing this:

Changing how the concepts are talked about is key to changing who they feel relevant to. The language used across the customer journey enables a switch from "you might need to engage with safer gambling if you have a problem", to "everyone who gambles with us, gambles safer".

When the aim is for all customers to build safer gambling habits, rather than being solely for those with a "problem", messaging can be used to frame safer gambling strategies and tools in more aspirational terms. Reinforcing the idea that the use of the tools and strategies that are there to protect all players is partly about helping to remove the stigma associated with safer gambling.

“Clever”, “smart”, “sensible” and “wise” are all terms that have been used in marketing to insinuate people can make ‘good’ bets, so why not also use them to describe people who understand and ensure they play within their boundaries?

The idea of positive framing is also particularly relevant when providing customers with tools. As they are currently set up, tools are almost always presented as a way to “limit” or set “rules” around a customer’s own behaviour. When viewed in this way, customers do not see them as relevant, especially when matched with language around them being a last resort, or a way to stop a problem getting worse.

There are opportunities to change the way tools and strategies are talked about, focusing on them as a way to “plan ahead”, outline “aims” or “targets” for a session. To prompt self-awareness, messaging should emphasise positives: “how was your session?”, “did you stick to your plan?”, “last time you played did you spend what you wanted?”

Should it even be called ‘safer’ gambling?
We talk about ‘safer’ and ‘responsible’ gambling as they are widely understood terms in the industry. Similarly, we have suggested the idea of integrated safer gambling as a useful phrase to distinguish the broader approach pursued in this project from other approaches. However, the ultimate aim is that all gambling is safe, by default.

By integrating safer gambling into the wider customer experience, we are trying to ensure it is the only way people play. Describing it to customers as ‘safe’, ‘responsible’, or anything other than normal, may in fact be unhelpful.

Many of the messages operators developed as part of this project steered away from this, and simply spoke to players as though the behaviours they were suggesting or prompting people to do were not specifically to do with ‘safer’ gambling, but just a normal behaviour the operator expected players to exhibit.

View from customer research:
During a user testing group for 888 Casino’s Control Centre, participants disliked names that emphasised safety or responsibility (one potential name was the ‘Safe Zone’), as they felt these had negative implications about the rest of their play. Instead, they preferred ‘neutral’ terms that focused on the intervention’s play-tracking features.
Examples of progress from the participating operators

**Gamesys:**

The centre of the Gamesys team’s intervention was a comms campaign based on the premise of #Sharethejoy. The underlying message was about being careful not to spend longer playing bingo than planned and setting an expectation that players will spend on things outside of bingo that make them happy.

As the Gamesys team said: “#Sharethejoy is our way of inviting our players to embrace the fun they have on site but to also make time for all the other things in their life that bring them joy”.

The Gamesys team knew that their target customers see themselves as “in control” or as “casual” players, and that standard safer gambling messages did not feel relevant to them. Instead they tapped into what they felt customers liked about Jackpotjoy – the social, community feel and inclusive, friendly tone of voice.

The Gamesys marketing team re-designed their session reminders so the language was more in line with the wider Jackpotjoy brand. They also planned to vary the text shown to help try and keep people engaged / less likely to ignore it.

The team specifically moved away from traditional responsible or safer gambling language, instead filling their campaign with references and prompts to safer gambling behaviours, tools and strategies, around this central message, while ensuring the campaign sounded like “something that we might say in one of our everyday brand campaigns”.

The Gamesys team also used prompts and messages at different points to set expectations about customer behaviour.

**888 Casino:**

The 888 team used the same creative and communications agency who develop their site and promotional content to create content for their new Control Centre, ensuring it aligns closely with their brand, and resonates with their customers.

“We just thought we need to package [it] a little bit differently. We called it the Control Centre because we didn’t want to impress upon the customer again that this is an area where you go to if you land up in trouble, or anything like that. It’s like a settings page in any kind of application.”

Yaniv Schwartz  
SVP Customer Risk Management, 888 Casino

**Betfred:**

During the development of the comms for the Betfred retail trial, the marketing team were involved from the beginning of the process. The team provided mock-ups and drafts for comms testing with customers and developed a range of options for feedback before taking through the best ideas.

**Buzz Bingo:**

Some of the content developed by the Buzz team made clear reference to the notion that the game was in fact “better” or “more” fun for customers when they were in control.

Though only live for a short period of time due to COVID-19, the campaign resulted in a notable increase in the number of customers using the range of safer gambling tools on the Jackpotjoy site – especially time limits. Individual social media posts were some of the most engaged with content the team had produced.
Touchpoints:

Use every opportunity to engage your customers

Each touchpoint you have with a customer - online or in person - is an opportunity to introduce, reinforce, support, or enable a behaviour. Being aware of all these touchpoints is an invaluable part of designing an integrated safer gambling strategy and better protecting customers. Gaps where there are currently no safer gambling messages are an opportunity to include them, and places where other marketing and promotional messages exist are an opportunity to adapt what is already there.

The operators participating in this project found the process of mapping out all their customer touchpoints, both with and without safer gambling messages, to be an eye-opening experience and valuable for identifying a wealth of opportunities.

For every operator, there are several broadly similar stages of the customer journey where safer gambling interventions can sit – although a customer may well not reach every stage with every operator:

- initial marketing / player acquisition
- the sign-up / registration process
- time on site or in store playing games, making bets or managing their account
- later points at which time a customer’s behaviour may be considered as demonstrating a higher risk of harm.

Sitting alongside this is an ongoing marketing and communication strategy aimed at building a long-term relationship between customer and brand.

Key learnings from the project

Use your full range of touchpoints

We have discussed how current safer gambling content is often limited to certain points in the customer journey. Online, emails at sign-up and separate safer gambling pages are most common, but these limited touchpoints are often only engaged with once someone identifies as having a ‘problem’, and this can undermine what might otherwise be effective messages to customers. In retail environments, posters and leaflets are the most common touchpoint for safer gambling messages.

Going beyond these limited touchpoints is essential to helping safer gambling behaviours become relevant for all who gamble and encouraging them to adopt these behaviours before they encounter harm.

Using multiple customer touchpoints reinforces key messages – the more someone sees something, the more they think it’s what they are supposed to do or think. This is the process of normalising safer gambling behaviours that sits at the heart of a more integrated approach. At the same time, we do not know when a customer may need or benefit from a message or intervention that reinforces specific safer gambling behaviours, so it is important they are repeated throughout the customer journey, so they are there when people need them.

“It doesn’t have to be complicated. It’s sitting down and looking at the journey of the individual customer – as we would do with marketing, exactly the same principles as that – but looking at it and going ‘right, the customer joins, what information do they get?’ When they sit down at a slot machine or start playing online, ‘What information do they get?’ How easy is it for them to access it? Is it on the screen, is it on a leaflet? Is in the right language? Where do we then need to guide, teach [or] reinforce behaviours to that individual customer? It doesn’t have to be complicated – we do this for other things, just do it for safer gambling.”

Ross Ferguson
Head of Responsible Gambling, Genting Casino
Use a customer journey map to explore every opportunity

As part of the programme we worked with the five operators to identify all the points at which online and retail operators might have an opportunity to engage with a customer:

<table>
<thead>
<tr>
<th>PRE CUSTOMER RELATIONSHIP</th>
<th>EARLY CUSTOMER RELATIONSHIP</th>
<th>ONGOING CUSTOMER RELATIONSHIP</th>
<th>CUSTOMER AT RISK</th>
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<tbody>
<tr>
<td>MARKETING</td>
<td>REGISTRATION</td>
<td>VISITING WEBSITE/APP</td>
<td>NEGATIVE INDICATORS</td>
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<td>&gt; Advertising</td>
<td>&gt; Registration process</td>
<td>&gt; Account log in</td>
<td>&gt; Direct comms/ messages</td>
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<tr>
<td>&gt; Promotions - special offers and free bets</td>
<td>&gt; Emails on sign up</td>
<td>&gt; Site menu(s)</td>
<td>&gt; Promotional offers</td>
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<tr>
<td>&gt; Brand building activity</td>
<td>&gt; Terms and conditions</td>
<td>&gt; Pop-ups</td>
<td>&gt; Player/account information or history</td>
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<td>&gt; Sponsorship</td>
<td>&gt; House rules</td>
<td>&gt; 'Toasters'</td>
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<td>&gt; Chat room</td>
<td>&gt; Loyalty schemes</td>
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<td>&gt; Chat host interaction</td>
<td>&gt; Web chat/ support</td>
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<td>&gt; Marketing</td>
<td>&gt; Game introductions/ tutorials</td>
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<td>&gt; Rich inbox</td>
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<td>&gt; Responsible gambling page(s)</td>
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</tbody>
</table>

Example customer touchpoints

Each operator’s touchpoint map will look different, but the above demonstrates how many opportunities there are to engage with customers. The operators taking part in this project helped us populate similar customer journeys and found them a useful tool for planning their interventions.

While mapping out each customer touchpoint and where existing safer gambling content exists is a valuable exercise, understanding what this looks like from the customer’s perspective is even more helpful.
Make it hard to ignore

Engaging with most safer gambling content, tools and resources is currently optional for customers, but it does not have to be if engaging with something specific is a crucial part of a safer gambling strategy.

Much like wearing a seatbelt in a car is no longer optional, operators have the power to make certain actions compulsory if they feel they are genuinely in the best interests of a customer. This often already happens with safer gambling interventions in more extreme cases where preventing a customer from doing something is considered the right thing to do to prevent them from harm.

All interactions with customers – whether safer gambling related or not – can be seen as more or less interventionist. We used the following simple scale when working with operators to assess how their existing safer gambling interventions were intended to engage customers and decide what approach might be taken with specific interventions:

› Lowest impact = must be actively sought out, is unavailable or difficult to find/engage with (e.g. a ‘safer gambling’ page on a betting website)
› Low impact = visible but easily ignored (e.g. a strapline or banner at the bottom of a poster)
› Medium impact = clearly presented, but player still has a choice about how much to engage with it (e.g. a dedicated safer gambling email sent to all players)
› Highest impact = clearly presented and interaction is required (e.g. a mandatory limit setting function for depositing money)

Most of the pre-existing operator interventions explored during this project met the ‘lowest’ and ‘low’ impact levels.

When designing an intervention, therefore, it is important to consider whether you need customers to interact with it for it to have the intended impact.

View from customer research:

As part of this programme we mapped the safer gambling content and activities that customers recalled when playing with different operators.

Customer research allowed us to demonstrate the differences between operator expectations and how customers actually experience safer gambling touchpoints.

Dan, 37, a regular customer at Victoria Gate casino, felt that the safer gambling leaflets simply were not relevant to him.

“I think it’s a good idea, but I don’t have a problem so I wouldn’t read them [RG Leaflets]”
Dan, 37, Victoria Gate customer

Archith, 34, a Genting Casino customer, did not realise that a section of the screen on Genting roulette machines displayed safer gambling messaging, despite playing on them regularly. He assumed that this screen only displayed the casino’s food menu.

“That one is for eating when you play... Why would I look? I know the menu”
Archith, 34, Genting Casino customer

Ross, 63, played regularly at a variety of online gambling operators. He reflected that he was unlikely to take in safer gambling messaging as he had seen it so many times.

“It’s plastered with them... it’s meaningless because I’ve read it a million times”
Ross, 63, Betfred Online and Genting Casino customer
Examples of progress from the participating operators

Participating operators used a wide range of customer touchpoints in their interventions, with some focusing on breadth and multiple touchpoints, and others focusing on a more limited number of previously unused touchpoints. All operators recognised that these interventions were just a first step on the journey to rethinking how to use all their customer touchpoints to greatest effect.

888 Casino

For their trial, 888 presented deposit limit setting across two different touchpoints to see which worked best—deposit limits upon registration, and deposit limits after a first-time deposit. 888 felt that both could be beneficial; offering tools at sign up sets player’s expectations right from the beginning, but offering it once they’ve had a chance to play and understand the site might make it more likely they will engage with the tool.

888’s deposit limit test involved mandatory interaction from customers in one of the trial groups. Being presented with the deposit limit tool in the registration process meant that customers who did not set a limit had to make an active choice not to do so. Unsurprisingly, this test resulted in a significant increase in the number of people setting deposit limits at sign-up (although it is important to note that the relationship between deposit limits and harm reduction is the subject of longer-term analysis at 888).13

Gamesys

Though the full extent of the trial was limited by COVID-19, Gamesys intended to integrate their campaign across their entire customer journey. Touchpoints included emails, social media and chat, on-site banners, promotions and pop-ups.

In terms of customer interaction, Gamesys’ #Sharethejoy campaign was visible but could be easily ignored by customers if they felt it was not relevant to them. They opted to focus on tone of voice and branding as a lever to try to make messages appealing. The high level of customer engagement with the content that they did test14 suggests this strategy can also lead to interaction.

Buzz Bingo

The Buzz Bingo team added re-worked safer gambling messages to multiple areas of the site: a permanent homepage banner, messages at the top of every bingo chat area, pop-up and ‘toast’15 messages, emails, social media posts, promotional video content and within their live streams. This intervention did appear to lead to increased uptake of certain safer gambling tools.

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13 Independent analysis of the data from the trial can be found in the Behavioural Insights Team reports, published separately.
14 See operator case studies for more detail
15 A toast notification or message, or ‘toaster’ advert, is a small message that shows up in a box at the bottom of the screen
Betfred

The Betfred retail team intended to use a range of in-store touchpoints, some of which are not normally used for safer gambling messages.

These included advertising and marketing materials, such as the large advertising banners that typically draw people into shops and messaging on screens, as well as other customer-facing communications like betting slips and leaflets. Alongside in-store communications, the Betfred team also used the store’s social media accounts to share the creatives.

The intention was that someone in-store would struggle to miss the messages but would not see them as standing out from everything else in a negative way. The messages were consistent at different touchpoints, even if someone is only in-store for a short period (e.g. popping in to place a bet).

Though these touchpoints were introduced in trial stores, the COVID-19 lockdown of March 2020 meant they were not in place long enough to be trialled fully.

Genting Casino

In the retail environment, the messages were displayed in new locations not previously used for safer gambling messages: secondary screens on the gaming machines and on the in-casino ATM. The messages were not across the entire customer journey, but the Genting team saw the importance of trialling the messaging in new, novel points where they interact with customers.

The ATM was identified as one of many touchpoints when we mapped out the customer journey with Genting customers, and the Genting team identified an opportunity to have a bespoke message added.

It is important to re-affirm that the position of messages alone is not enough. The messages customers see at each touchpoint have to be effective in the first place, and part of a wider integrated system of messages and expectations about how customers will behave.

The ATM messages implemented by the Genting team, for instance, made good use of a novel location where there was an opportunity to deliver a targeted message. However, the message itself was largely lost due to how the on-screen display was designed.
Changing behaviour:
**Motivate and enable customers to remain in control**

There is a wealth of insight available on how to change customer behaviour. Marketers and behaviour change experts have spent decades establishing best practice ideas for how to nudge customers. During this project, we worked closely with operators to explore all the different behaviour change techniques that they could use and identify which felt most appropriate given their objectives.

### Key learnings from the project

There are numerous frameworks and tools available for building a behaviour change strategy, many of which are supported both by academic evidence and validated by their continued use in marketing.

At its core, much of this work points to two key levers you can pull – motivation and ability\(^\text{16}\). Safer gambling messages should aim to make safe behaviours more appealing (increase motivation) and easier (increase ability).

For safer gambling to be motivating – it must be socially normal, aspirational and associated with status.

For safer gambling to be easy – players need to understand how the games work, be self-aware of their own play behaviour and have tools and strategies for staying in control. Engaging with safer gambling interventions should be seamless and frictionless.

### Motivate customers to gamble safely by making it appealing

Safer gambling messaging and interventions cannot only focus on what people should do or how they can do it. It also needs to reinforce a reason why – motivation.

Previous in-depth research with gambling customers published by the Senet Group illustrates a range of different motivations for people to gamble safely:

- **Avoiding loss**: people do not want to lose more than they can afford or are willing to spend on gambling

### Make safer gambling socially normal, aspirational and associated with status

A common feature of conventional safer gambling communications is the idea that only a small number of people will ever need to think about their behaviour.

An integrated approach assumes that everyone will benefit from knowing or thinking about how to ensure they remain in control of their play, and the language used in these communications must reinforce this. Just referring to “everyone”, “us”, or “we” is a simple way to use language to build on this concept.

- **Maintaining positive relationships**: people do not want their gambling behaviour to impact negatively on their personal relationships
- **Avoiding stigma**: people do not want to be associated with the idea of ‘problem gambling’ (this could be seen as one reason why messages about problem gambling fail to resonate with so many people)
- **Positive self-image**: people want to feel they are the kind of person who stays in control

These motivators drive different people to varying degrees, but all customers who were interviewed reflected with at least some of them.

To tap into these motivators, messaging should associate safer gambling behaviours with positive desired outcomes.
Most operators’ marketing departments will already be thinking about how to associate their brand with aspiration and social status. In a variety of different ways, operators are good at making customers feel that their brand is cool.

This same strategy can be used to motivate customers to play in a way that is safe. The goal should be that risky gambling behaviours are seen as uncool, and gambling in control and safely is seen as aspirational.

“It should be that all customers use this, it’s something that’s great. It’s not a negative thing, it’s not because you have a problem, it’s because this is what we do. This is a normal journey, use it as a backstop, not because you have a problem, just to look after the way you play, and control the way you play.”

Ross Ferguson
Head of Responsible Gambling, Genting Casino

Enable customers to gamble safely by making it easy

Currently, huge efforts are put into making gambling an easy, seamless and fun experience. Good customer service aims to remove stress and irritation from the process of playing. Good user experience of a website aims to make sign-up, depositing and play and as easy as possible.

To change behaviour, operators already make sure as little friction sits between customers and the desired behaviour (gambling) as possible.

These principles must also be applied to safer gambling. Operators must aim to empower customers with all the skills and knowledge required to play safely, and they must remove any barriers to doing so.

Make sure customers are aware of their own play behaviour

Improving self-awareness is about empowering customers with objective, accurate knowledge of their own behaviour. People who gamble often under-estimate their losses or over-estimate their wins17 and play in a way that they come to regret as a result.

View from customer research:

Inez, 35, a regular customer with Jackpotjoy, told researchers that she had a £20 daily deposit limit, and that she would never spend more than £20 on any given day.

However, when looking through her account with a researcher, Inez realised that she would often deposit up to £60 a day and had at one point increased her deposit limit to £400 a day.

Make sure customers understand the games they are playing

In order to make safer decisions about how to gamble, players need to understand how the games they are playing work.

In 2017, we wrote about player’s ability to make informed choices based on an accurate understanding of games and bets:

“Most current practice around ‘informing player choice’ seemed like it was designed to be technically accurate and ‘available’ (although often only if you looked for it). However, player feedback suggested that it was not easy to understand and there was little to motivate them to engage with it. Specifically, information was often poorly formatted, to the point of sometimes being totally illegible. Moreover, the length and technicality of language used to explain games was found to confuse players, with its placement often so far from the point of purchase that there was limited likelihood of it ever influencing decision-making. When contrasted with other information in the playing environment (e.g. marketing messages, membership information, game-play), this information was perceived to lack any kind of stand-out, and be boring, unengaging and overly complex.”19

17 In control: How to support safer gambling using a behaviour change approach, a Revealing Reality report for the Senet Group
18 Research conducted in 2018 by the Behavioural Insights Team around remote interventions has demonstrated that “reducing friction (for example, making ‘responsible gambling’ tools easier to access) was an effective way of increasing the number of players setting deposit limits and setting a cool-off period.” See https://about.gambleaware.org/media/1869/gambleaware-phase-iii-report_updated-v1.pdf. There is further new research into this area due to be published in late 2020. See https://about.gambleaware.org/research/research-projects/’Remote Interventions, Phase II - Behavioural Insights Team’ for a summary.
19 Responsible Gambling: Collaborative Innovation Identifying good practice and inspiring change
Examples of progress from the participating operators

All the participating operators encouraged customers to engage with the tools they currently have in place to help them stay in control of their own gambling. The teams used different methods to advertise and normalise the idea of engaging with safer gambling.

**888 Casino**

The 888 Casino trials encouraged the use of the deposit limit tool in different ways. One group was presented with the option to set a deposit limit during the 888 Casino registration process, setting up the idea for new customers that this was a default, normal, expected thing to do. Another trial group was prompted to set a limit the next time they logged on after they had made a first deposit. Here the 888 team acknowledged that choosing a deposit limit may be more feasible once a customer has played on the site at least once and knows the cost of games.

The development of the 888 Control Centre, meanwhile, is an example of providing people with accessible tracking tools with the goal being increased self-awareness. The Control Centre is focused specifically on providing customers with accurate and timely data on their own behaviour on the site or app. It currently shows customers a range of information about their gaming history, and customers can change the durations this data relates to (e.g. last 7 days, month, year). In future, the team are hoping to integrate it with a wide range of personalised customer activity.

Some of the design decisions were intended to make access to this information as easy and frictionless as possible, such as accessing the Control Centre from the site menu (where customers see their account balance and go to deposit or withdraw money).

The branding and framing of the Control Centre was also carefully considered with the objective being to make engaging with it seem aspirational, and not associated with ‘problem gambling’. 888 felt their customers would be attracted to the ‘technical’ branding and sense that a player would be more in control – savvier and smarter – if they used it.

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**Gamesys**

Gamesys’ campaign intervention primarily focused on improving customer awareness of their time spent on site and directing people specifically to their time management tools. The campaign also aimed to influence spend, by encouraging players to celebrate small wins and withdraw their winnings.

**Genting**

The messaging on gaming machines in the Genting casinos was aimed at encouraging people to use the limit-setting tools and reminders built into the machines. Messages were tailored to appear as players hit certain time thresholds playing on a machine (e.g. 1 hour).
**Betfred**

For one group of customers the Betfred digital team implemented a trial in which customers were sent a breakdown of some key playing behaviours / statistics. The intention was to get these customers to reflect on whether the information they were being shown matched their expectations. This targeted approach used data points such as the amount of time spent playing after midnight and showed changes over time (e.g. previous 7 days vs. last 7 days).

The straightforward messaging used in some of the Betfred comms encouraged people to adopt strategies for managing their time outside of the tools available on the site or app (e.g. “Plan ahead and decide how long you want to gamble for”).

The Betfred communications utilised different approaches for different groups. One group of more frequent players were shown more personalised data about their own play behaviour, while other customers were shown more general messages.

The Betfred retail team developed a range of messages focused on encouraging customers to plan their play and reflect on their behaviour. These had a simple, central message of “Watch your spend”.

Another message aimed to directly tackle customer’s understanding (or misunderstanding) of games - “The fact of the matter is the more you gamble, the more likely it is you will lose even more money”.

We would not expect these individual messages to have a significant impact on customer behaviour alone, but as part of a wider strategy this kind of targeted intervention certainly has a role in improving awareness and understanding among customers.

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**Buzz Bingo**

The Buzz team took a very direct approach in some of their messaging to make it clear to customers that the use of safer gambling tools is not restricted to just some people who experience harm or are more likely to with the line “Our tools are for everyone – lots of Buzz Bingo members use them.”

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![Betfred Safer Gambling Tools](image-url)
Set targets:
Identify how you will measure safer gambling change

Any business leader or manager will tell you that setting the right KPIs is essential to creating change in large organisations. Getting them wrong can lead to damaging unintended consequences. The KPIs that are used to develop, evaluate and iterate safer gambling messages are therefore crucial to achieve genuine change.

Key learnings from the project

The operators who participated in this project all recognised that their current safer gambling efforts are in many ways driven by the KPIs set by their organisation. For example, securing the time of marketing teams to work on safer gambling was a challenge for some because of the commercial targets those teams are working towards. If key performance metrics sit in tension with safer gambling objectives, changing commercial KPIs as well as adding in additional safer gambling ones needs to happen to rebalance priorities.

During the project, operators reflected that establishing the right KPIs for their interventions helped them to:

- Align the teams working on interventions behind relevant and impactful goals
- Incentivise staff to meet safer gambling targets, e.g. through bonuses
- Establish transparency and clarity around their safer gambling strategies, making it clear to all stakeholders why they were pursuing a given path
- Design robust and valid evaluation plans
- Demonstrate positive impact and progress as a result of their interventions

What makes a good safer gambling KPI?

The best measure of any desired behaviour change is an observable change in that behaviour. In the context of safer gambling this would usually be a reduction in harm or concerning gambling behaviour. Some of the participating operators in this project were able to measure these outcomes as a result of their intervention – for example measuring a reduction in self-exclusions or staff interventions with players as a result of their behaviour.

In many cases, measuring the actual desired behaviour change is not possible or prohibitively difficult or expensive. Several operators developed metrics which were indicative of the behaviour they were intended to change, if not direct evidence of it. All operators had to weigh up the balance between how direct and how measurable their metrics were.
Build a logic model to explain your metrics

A logic model is a useful tool for mapping out your desired behaviour change and identifying the best metrics for tracking it.

A logic model is a visual representation which explains the theory of how an intervention produces its outcomes. It represents, in a simplified way, a hypothesis behind how an intervention works.

If it is not possible to measure direct evidence of the intended outcome of your safer gambling intervention, a logic model can help you identify and justify what the ‘next best’ metric is for judging whether it has worked.

In general, combining a variety of measures is the best way to maximise the chances of establishing change. A logic model is helpful for establishing what combination of metrics would provide the best evidence for the impact of an intervention. When a single measure becomes an end-goal in and of itself, it ceases to be a good measure\(^2\) as it can lead to unintended consequences or perverse incentives. For example, if the sole measure of success for a safer gambling campaign was ‘awareness of the campaign slogan’ and all activities were organised to meet this target, then staff might make every effort to put the message in front of customers, whether or not it has any actual impact on their gambling behaviour.

During this project, all five operators developed a bespoke logic model for their individual safer gambling interventions. During this process they were able to:

- Make a case for why they felt their intervention would work
- Establish what they would measure in an ‘ideal world’ as well as what was practical given logistical and financial constraints
- Identify potential unintended consequences or perverse incentives and mitigate them

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20 Goodhart’s law: When a measure becomes a target, it ceases to be a good measure
Feed evaluation into continual improvement

Any safer gambling strategy should not be a one-off effort. Your insight into your customer base is continually evolving, and so should your safer gambling efforts. The operators who took part in this project saw their efforts as just one step on a journey towards a fully realised integrated safer gambling strategy.

Continual improvement requires insight, and the metrics and data gathered as part of evaluation are an essential ingredient for fuelling this process. While large scale randomised control trials are the ‘gold standard’ of evidence, this is not the only form of evidence for successfully evolving a safer gambling strategy. Quick, iterative ‘test and learn’ approaches to developing interventions can often be fast and effective.

Operators in this project utilised their existing methods for testing and iterating marketing and product development, including tapping into user insight, A-B testing and detailed analysis of player data (see section 3 for more detail on evaluation approaches).

‘We tend to put a lot of emphasis on testing, so if we have one product version versus the next product version, we spend a lot of time testing the one versus the other in A-B testing or a controlled testing environment. The same with marketing – one marketing campaign versus another. And responsible gambling is no different. We often test one message versus another message, one control versus another control.’

Yaniv Schwartz
SVP Customer Risk Management, 888 Casino

Examples of progress from the participating operators

**Gamesys**

The Gamesys team focused on time as a measure, particularly improving customer awareness of time spent on the Jackpotjoy site and encouraging customers to strike a balance between time on and off the site. This was an intentional decision by the Gamesys team to focus more on this area:

“Research showed that players felt we were bombarding them with messages about multiple tools during responsible gambling week. Therefore, for this campaign, we had a more single-minded focus on session reminders and taking a break from gameplay on site”

**Gamesys marketing team**

The campaign also aimed to change the way players manage spend, e.g. asking players to celebrate after small wins and withdraw their money.

Gamesys set out to measure session durations, response to session reminders and likelihood to withdraw winnings as their more ‘direct’ measures of impact. They also measured engagement with their safer gambling campaign content via social media activity, sentiment analysis and click throughs from emails.

**888**

The primary area of focus for the 888 team was spend and their approach focused on the introduction of deposit limit setting. The trials they implemented were designed to test the effectiveness of encouraging the use of deposit limits at key points in the customer journey in order to reduce spend-associated risk indices in their player data.

The metrics 888 chose to track included the rate of setting deposit limits, size of chosen limits and subsequently whether players hit these limits compared to a control group who had not received the intervention.

**Buzz Bingo**

The Buzz team developed a suite of messaging that encouraged a range of behaviours related to both time and spend, with a focus on measuring the use of the range of safer gambling tools available on their website (usually accessed only from going directly to their ‘responsible gambling’ page). The comms focused on the whole toolkit, as well as having a specific theme in certain weeks (e.g. deposit limits, gameplay reminders).
Do not undermine your efforts: Be aware of competing messages

If safer gambling is to be effective, it cannot be outgunned by competing sales messages that fail to reinforce, or in some cases undermine, the desired safer gambling behaviours.

A truly integrated safer gambling strategy means that the desired behaviours are reinforced at every touchpoint, across the entire gambling environment.

Throughout the project, operators were encouraged to reflect not only on their safer gambling messaging, but also on the wider range of influences which exist within the gambling environment. Only by assessing all aspects of the customer experience, including engagement with both safer gambling and sales techniques, can a fully integrated strategy be established.

Key learnings from the project

Safer gambling should not be overshadowed by sales techniques

Almost every available surface and display in any gambling environment, off or online, has been optimised for encouraging people to gamble. In-store, posters, screens, flashing lights, noises and staff interactions have often been designed with this in mind. Online, every aspect of the user interface and journey, graphics and banners are designed to encourage sales. Notifications, email, direct marketing and offers are all served as prompts to tempt customers to engage with each brand.

Against this sheer volume of sales techniques, and even with the best-intentions, safer gambling messages alone are likely to be insufficient. To compete, safer gambling messages need to have the same visibility as sales messages. Or even better, all the messages should be promoting safer approaches to gambling.

Safer gambling should not be contradicted by sales techniques

Layering safer gambling messages with others which directly contradict them is confusing to players.

Being totally consistent about safer gambling might mean removing other messages and cues the customer is exposed to, not just adding new things into the environment.

To identify these potentially undermining influences, operators need to understand the biases and heuristics that players use to interpret the world around them. It may be that your play environment is affecting customers in ways you did not intend, such as nudging people to place higher stakes, underestimating their spend, or misunderstanding their likelihood of winning.

There is a rich literature and evidence base for the heuristics and biases that as humans we all fall prey to, including many papers which specifically discuss how these work in different gambling environments. A summary of the relationships between these and the gambling environment was analysed and presented in our previous report: Responsible Gambling: Collaborative Innovation, Identifying good practice and inspiring change. 

21 Annex 2: Underlying behavioural economics concepts
The gambling environment can undermine safer gambling messages

An overwhelming focus on ‘winning’ over ‘losing’ in messages is likely to lead people to overestimate their chances of winning22

- More attention-grabbing sounds and noises associated with ‘money out’ over ‘money in’ are likely to mean people more keenly remember what they won but forget what they spent23
- High defaults on stake sizes and limit setting tools act as anchors and encourage people to spend more than they otherwise would24
- Cues such as ‘machine reserving’ services and ‘hot and cold number’ displays are likely to reinforce false beliefs about random fixed odds games25
- Lack of cues for the passing of time (e.g. lack of natural light and clocks in casinos) are likely to lead people to spend more time playing than they may intend to26

Careful attention must be paid to ensure these negative influences do not undermine the safer gambling objective.

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23 Ibid
What can be achieved by taking an integrated approach?
Conclusions & recommendations

Participating operators have taken an important first step to making safer gambling preventative. They have shown they have the commitment and ability to move towards an integrated approach to safer gambling, and that they intend to continue on that journey. This is important progress for the industry.

If these five operators can take this first step, so can others. Operators, regulators, researchers, and people who gamble now need to move together towards the vision set out in this report. We all know what we want gambling to look like. To get there we need to hold each other to account.

This project provides a roadmap to make this vision a reality

- Single safer gambling interventions are almost certain to be outgunned or contradicted by the wealth of sales messages and encouragements to gamble.
- For safer gambling to become the default, players need to experience consistent, appealing and motivating support to stay in control. Operators must take responsibility for integrating safer gambling into everything they do.
- The skills and expertise required to improve the quality and appeal of safer gambling approaches already exist in abundance at most operators - they just aren’t being put to best use.
- Marketing approaches within gambling operators are extremely successful. When marketing practices - design, testing and evaluation - are aimed at safer gambling, radical improvement can be made.
- Innovation in safer gambling must be operator-led. Operators are not only responsible for their customers’ welfare, they have the design skills, the budgets, and the testing capability to best protect them.

The case studies in the following section illustrate how participating operators put some of these ideas into action.

In all cases, the interventions represent just a small number of ways in which integrated safer gambling approaches can be utilised. Each individual intervention could no doubt be improved upon, but the most important development or next step for participating operators would be to embed these ideas in everything they do.
Operator case studies
Gamesys

Overview: Treating safer gambling like any other marketing campaign

Gamesys developed the #Sharethejoy comms campaign to encourage safer gambling behaviours across their Jackpotjoy customer base. The campaign intended to encourage players to strike a balance between their time on and off site, by actively encouraging people to take breaks, consider how to spend their time not playing and reminding them to spend winnings offline.

#Sharethejoy was designed to feel just like any other Jackpotjoy comms campaign might, repurposing familiar touchpoints and the brand’s existing playful and community-focused feel. The campaign was developed and deployed by Gamesys’ marketing and insights teams.

Integrating messaging into the existing Jackpotjoy brand in this way aimed to ensure the campaign felt relevant to a subset of customers who typically see themselves as ‘in control’.

“The plan for #Sharethejoy was to more naturally integrate [safer gambling] messaging within brand campaigns and communications to players”

Gamesys marketing team
Gamesys’ interventions

During the project the Gamesys team ran the #Sharethejoy campaign as well as using some of the same design principles in their safer gambling work during COVID-19.

#Sharethejoy

The #Sharethejoy campaign that was rolled out across the whole Jackpotjoy site. It aimed to influence the time that customers spent playing games on Jackpotjoy.

Specific aims were:

› To encourage players to strike a balance between their time onsite and time away from site.
› To encourage players to celebrate even small wins, either by withdrawing money or taking a break.

As the Gamesys team said:

“#Sharethejoy is our way of inviting our players to embrace the fun they have on site but to also make time for all the other things in their life that bring them joy”.

Gamesys marketing team

The campaign used a number of channels to reach customers and focused on encouraging the uptake of safer gambling tools (particularly session reminders) and promoting non-gambling related behaviours.

Impact of COVID-19

Unfortunately, the #Sharethejoy campaign was discontinued and indefinitely postponed after being live for just three days following the COVID-19 lockdown in March 2020 as its call to action messages – e.g. spending time with friends and family – were no longer appropriate.

COVID-19 Safer gambling activities (across all brands)

Though #Sharethejoy was halted, the Gamesys team were keen to embed the learnings into their safer gambling work during COVID-19, notably tone of voice, integration within regular day-to-day content and ensuring look and feel was more integrated with the brand.

How Gamesys used the toolkit

Gamesys’ interventions aimed to be relevant to customers who see themselves as ‘casual’ or ‘in control’, meaning that existing messaging does not appeal or seem relevant.

To encourage safer behaviours across their whole customer base, Gamesys worked to ensure the campaign felt like any other communication they might have with their customers.

This had two key components. First, the Gamesys team aimed to use a tone of voice that was consistent with the rest of their brand. Second, they worked to integrate safer gambling messaging into existing everyday comms. Both intended to make safer gambling feel part of the customer experience, rather than something separate.

Throughout, Gamesys’ interventions were led by the marketing and insights team. With a comms campaign as the core of the intervention, the marketing team applied the same development and deployment process as they would on any other promotional campaign.

#Sharethejoy objective

“How can we design a comms campaign to tackle the barriers to adoption of responsible gambling tools among a more female, community led player group, who pride themselves in being in control of their play?”

“Responsible gambling content was traditionally ‘silod’ within the business. Unlike other content on site, it was not always developed in collaboration with the brand team. This led to RG content often taking on a more compliance or legal tone of voice that was not in keeping with the brand and as a result, did not always feel relevant or interesting to players”

Rose Tomlins
Head of Brand & Consumer Insight, Gamesys

Integrating safer gambling messages into existing comms to ensure they no longer felt additional or were outgunned by other messaging.

In this case, a #Sharethejoy banner signposting customers to session reminders was a constant addition to the homepage, with a similar view from before the trial for comparison.
An Integrated Approach To Safer Gambling

| Operator Case Studies |

Key features of Gamesys’ Interventions

How were Gamesys’ interventions designed in a way that aligned with the key principles of the project?

**Set targets:**
What behaviours were Gamesys aiming to change?

#Sharethejoy focused on encouraging players to set boundaries around the time they spend on and off the site. Specific target behaviours included: increased awareness of safer gambling tools and setting session reminders and time limits.

Gamesys chose time as their focus to ensure the intervention had a clear target outcome.

“Research showed that players felt we were bombarding them with messages about multiple tools during Responsible Gambling week. Therefore, for this campaign, we had a more single-minded focus on session reminders and taking a break from gameplay on site”

**Gamesys marketing team**

Influencing behaviours around time also tied in with helping players manage their spend. For example, one of the campaign’s key messages was asking players to celebrate small wins and withdraw their money.

**Touchpoints:**
What opportunities did Gamesys take to engage their customers?

Though the full extent of the #Sharethejoy campaign was curtailed by COVID-19, Gamesys used a wide range of touchpoints to communicate with their players, repurposing existing communications to engage their customers.

As with any other comms campaign, these touchpoints were across multiple channels and messages were consistent across the journey.

**Social media pages** were updated with the campaign logo and hashtag.

**Social media posts** included signposting to tools in a more integrated way.

Using a tone of voice consistent with the wider Jackpotjoy brand. Below are examples from before and during the intervention.

“We want you to know all the tools available that can help you stay in control” becomes “nothing beats an uninterrupted chat with a good pal, so at your next session reminder . . .”
Large banners were added on the Jackpotjoy homepage to signpost players to session reminders:

Emails were used to raise awareness of the campaign. Though only one email was sent out before the campaign had to be halted as a result of COVID-19, Gamesys planned to send out 2-3 more.

COVID-19 Activities

As in the #Sharethejoy campaign, Gamesys aimed to use a range of existing touchpoints with customers, integrating safer gambling messages where promotional material may have been previously.

On site banners on Jackpotjoy were re-purposed for all ventures. This space is generally prioritised for product promotions and was instead used for safer gambling comms during the lockdown period.

Email footers containing promotional content were removed, and safer gambling messaging put in their place instead. These messages were re-written utilising the tone of voice developed as part of the #Sharethejoy campaign.

Emails were sent to the full player base, reminding them of the different safer gambling tools available to them as well as reassuring them that customer support remained open 24/7.

Social media campaigns’ promotional content was paused, with a focus given instead to entertainment and community related posts to help boost morale. Every social media post across all brands promoted safer gambling tools and behaviours, while keeping the overall tone fun and light-hearted.

Gamesys used pop-up overlay on their Android app to remind people to set safer gambling tools and keep things fun. This is a touchpoint that is usually used for promotional materials.

Chat and community promotion promoted awareness of free content and community tools on site.

Tone of voice:

How did Gamesys talk to customers?

Gamesys were keen that #Sharethejoy felt like any other comms campaign, aligning with the look and feel of their humorous and community-focused brand.

Reviewing previous work for responsible gambling week, Gamesys recognised that safer gambling content could seem slightly at odds with their wider brand. Since then, Gamesys had been taking steps to integrate safer gambling content into their branding, by changing its look and feel and adding ‘gamified’ elements. These learnings were taken even further during the #Sharethejoy campaign, as the team aimed to integrate safer gambling messages into existing communications.

The Gamesys marketing team re-designed their session reminders so the language was more in line with the wider Jackpotjoy brand. They also planned to vary the text shown to help try and keep people engaged / less likely to ignore it.

For example, the team specifically moved away from traditional safer gambling language, instead filling their campaign with softer references and prompts to safer gambling behaviours, tools and strategies, around the central message of spending time off site. Throughout they aimed to ensure the campaign sounded like ‘something that we might say in one of our everyday brand campaigns’.

The Gamesys team also recognised that the social element of their bingo and slots offer is important for Jackpotjoy customers. The new approach was therefore intended to be more holistic and social. Building on the idea of inclusivity and the community feel the brand tries to create for customers, Gamesys encouraged players to look out for each other and become ambassadors for some helpful safer gambling messages, aiming to use the community to “share the burden of responsibility”. The bingo and slots chat rooms therefore featured in their intervention.

Integrating messages into community-focused messaging

Social media posts integrated prompts to use session reminders within wider posts encouraging engagement with the community (e.g. sharing photos of pets), ensuring that it did not feel separate or for a certain type of customer.
Using inclusive language

The Gamesys team used prompts and messages at different points to set expectations about customer behaviour. Here, they are assuming that customers might already be using session reminders, further normalising the idea that these should be a default part of play.

COVID-19 Activities

As above, the tone and feel of messaging was intended to align with Gamesys’ brand, emphasising positivity, inclusivity, and a community feel.

Opportunities for future iterations

As the #Sharethejoy campaign was halted in March 2020, Gamesys were unable to evaluate whether the campaign appeared to have any long-term impact on customer behaviour. In future, monitoring this kind of data will provide ongoing evidence for what works to help customers play safer, and enable successful iteration.

There are also opportunities for Gamesys to trial alternative tones of voice in future iterations. Some participants in the comms testing did not understand the calls to action in the #Sharethejoy messaging (e.g. to spend winnings offline) or struggled to find an obvious motivation to engage with activities. Future interventions provide an opportunity to address these challenges.

Evaluation

Trial details

Gamesys intended to do a full pre and post evaluation of #Sharethejoy, however this was cut short due to COVID-19.

Instead, the impact of the campaign was analysed by the Gamesys team using the kind of metrics used to measure other comms campaigns. An independent impact evaluation of data has also been conducted and will be published separately.

Despite limited data, the initial findings suggested that safer gambling communications designed in this way were extremely successful at engaging customers compared to other safer gambling content.

“Overall, the campaign was successful in encouraging session reminders in order to promote time off with friends and was likely to have continued to enjoy increasing success as further emails were sent”.

Rose Tomlins
Head of Brand & Consumer Insight at Gamesys

Outcomes

› Session reminders saw a significant increase on the day of launch, with the number of players setting reminders rising from 4 to 781.

› The #Sharethejoy email campaign had a 33% open rate and 12% click through Rate. Given the low percentage of active players during the trial period, this is a positive result.

› #Sharethejoy content was the top performer for Jackpotjoy across Twitter and Instagram in March 2020. For example, the single Instagram post released before the campaign was pulled achieved the “highest engagement rate in recent times” (3.45% engagement – up from a next highest of 3.22%).
Outcomes – operator reflections

“The safer gambling intervention helped prioritise several ongoing workstreams within Gamesys and acted as a catalyst to pilot our hypothesis and ideas through the #Sharethejoy campaign. We wanted to prove that better integration of responsible gambling messages within the daily activity of a brand would lead to more positive player perceptions around safer gambling content.”

“While our intervention was cut short due to COVID-19, we had learnt enough to know that our hypothesis and ideas were working. This gave us the confidence to apply the learnings across our brands, resulting in a better outcome for our players and very positive player sentiment.”

Rose Tomlins
Head of Brand & Consumer Insight at Gamesys

Looking forward: project legacy

Gamesys are keen to continue using the principles of an integrated approach across all of their business, and recently kicked-off a project to continue developing a new tone of voice for safer gambling messaging across all of the company’s brands.

“Raising responsible gambling awareness and normalising the conversation will remain a part of our ongoing strategy. As we move out of lockdown, we will reintroduce product-led and promotional activity but continue to weave in responsible gambling messaging on a more ongoing basis. A-B testing continues as we overhaul the tone of voice of all of our responsible gambling campaigns across all our ventures, with a commitment to replacing all old content on our ventures within the coming months with the new tone of voice.”

Rose Tomlins
Head of Brand & Consumer Insight at Gamesys
Buzz Bingo

Overview: Using more of the customer journey

The Buzz team developed a four-week intervention to encourage the uptake of safer gambling tools among their online players. This centred on directing customers to their safer gambling ‘toolkit’, as well as specific tools in certain weeks (e.g. deposit limits, gameplay reminders). The new communications ran throughout April 2020.

The Buzz team focused heavily on how they could include consistent safer gambling messages at many more points in the customer journey than had been used previously, as well as making access to tools and information simpler. Buzz’s marketing and digital teams worked closely on the feel of their interventions, ensuring that they were ‘soft’ enough to align with the wider Buzz brand, and that all language was positive.

While only the first step towards a totally integrated approach, the principles employed by the Buzz team aimed to normalise the use of tools in the long term.

Impact of COVID-19

The Buzz team actually brought forward some of the plans they had been developing as part of this programme to be able to run a series of safer gambling interventions in response to the COVID lockdown. Their new communications/interventions ran through April 2020.

Key features of Buzz’s intervention

**Set targets:**
What behaviours were Buzz aiming to change?

Buzz aimed to encourage a range of behaviours related to both time and spend, focusing on directing customers to the range of responsible gambling tools available on their website, and then encouraging their uptake.

Three of the key tools (Deposit Limits, Game Play Reminders and Time Out / Self Exclusion) were each a focus of a week of the intervention.

**Touchpoints:**
What opportunities did Buzz take to engage their customers?

The Buzz team used a wide range of touchpoints to encourage customers to engage with their tools.

These tools were previously accessed solely through the responsible gambling page, and the intervention aimed to integrate them better into the everyday customer experience.

These touchpoints were consistent and repeated across different areas of the customer experience. Some of the touchpoints were also permanently visible, rather than having to be sought out or appearing only at certain moments.

There were constantly visible banners, interactions triggered by certain actions (e.g. upon the third deposit of each week) and prompts at regular intervals.
Additional touchpoints included:

A permanent banner on the homepage (deliberately “loud and proud”)

Before

![Before Image]

After

![After Image]

Buzz’s intervention introduced new permanent additions to their homepage menu and a set of action-triggered prompts at different points in the customer journey.

Tools as menu items. The Buzz team added tools as new permanent items on the permanent mobile menu (86% of Buzz activity is on mobile), rather than including them only within the responsible gambling tab.

Safer gambling messages in Bingo rooms. Constant safer gambling messages were added to the top of every live bingo room, reminding players of responsible gambling options.

A ‘toaster’ video pop-up. An interactive video explaining safer gambling and explaining tools ‘in language our customers will understand’, triggered by the third deposit in any week.

A ‘toaster’ pop-up upon first login within anti-social hours (1am–6am).

A weekly email to all players. Initially pushing Buzz’s safer gambling tools and then a different tool with more in-depth explanation each week.

Changing behaviour: How did Buzz help their customers stay in control?

The focus for the series of Buzz communications was on improving self-awareness and encouraging the use of tools and strategies among players.

Each week of the campaign was focused on promoting a different tool available on the Buzz site, as well as driving traffic consistently through to the safer gambling pages on the website.

Tone of voice: How did Buzz talk to customers?

Buzz were keen that the language used in their intervention was inclusive and appealing to customers, rather than something that felt separate to the general customer experience.

Making language inclusive

The Buzz team took a very direct approach in some of their messaging to make it clear to customers that the use of safer gambling tools is not restricted to just some people who experience harm or are more likely to.

“Our tools are for everyone – lots of Buzz Bingo members use them.”
Positive framing

Some of the content developed by the Buzz team made clear reference to the notion that the game was in fact better or more fun for customers when they were in control. Language was also softened across communications with customers, for example comparing setting a gambling budget to managing day-to-day spend on groceries.

Opportunities for future development

Given the timeframe the Buzz team were operating in to get their interventions live, there was no time for testing communications with customers, something that ‘business-as-usual’ development of safer gambling messages would certainly benefit from.

There were also opportunities to focus messages at broader strategies beyond the use of existing tools – for instance, encouraging self-awareness more generally.

The communications focused on “safer gambling” which means people need to have some active interest in engaging with this concept. Future iterations may benefit from talking about the behaviours they are encouraging players to take up not as “safer gambling” behaviour, but normal, expected things everyone does – which some of their messages were already suggesting directly.

Evaluation

Trial details

Due to the circumstances caused by COVID-19, the Buzz team were not able to set up a specific trial to test the new interventions and messages. Instead, they employed them across the site for all customers. A simple pre-post analysis focused on observable changes in key measures from the point at which the interventions went live on the site.

An independent impact evaluation of data has been conducted and will be published separately.

Key outcome(s) being measured

The Buzz team looked specifically at the use of the in-built safer gambling tools on the site as the communications were intended to direct people to these and encouraged people to use them.

The team also used traditional marketing communications measures to track the relative effectiveness of their communications, looking at impressions and click-through rates on the safer gambling content, and traffic generated to their safer gambling pages.

Early outcomes

- Use of time-outs and session reminders increased
- Use of self-exclusion decreased – a hypothesis was that people were using a range of different tools rather than resorting to self-exclusion
- A significant amount of traffic was generated to the safer gambling website pages, which was sustained over the campaign period
888 ran two workstreams for this project. One focused on the uptake of deposit limits by adding additional touchpoints to the 888Casino signup process. The other was the development of 888’s ‘Control Centre’ – an area where customers could easily access data on their gambling activity, and which provided easy access to a range of safer gambling tools and other account settings.

888’s interventions are a good example of how the positioning of interventions and messages in the customer journey can be used to start to normalise the idea of engaging with tools and information that can help people develop and maintain safer gambling behaviours.

888’s interventions were designed in collaboration with their marketing teams to look and feel like any other content on the site. For example, the Control Centre was designed to look like any other settings or account information page, rather than something safety focused. The 888 team have also engaged a creative agency to help with the language used in the Control Centre.

888 were keen to test and iterate their interventions, as they would with any other campaign.

Impact of COVID-19

888’s interventions were not impacted by COVID-19.

“One of the things this project made us crystallise in our minds is that a normalisation of responsible gambling tools and information is the way to go in order to touch as many customers as possible — long before they get into any space of harm.”

Yaniv Schwartz
SVP Customer Risk Management
**888’s Interventions**

As part of this project the 888 team ran two workstreams:

**Intervention #1: Deposit limit uptake trial**

A discrete intervention inserted into the normal customer journey to encourage greater uptake of the deposit limit tools on the 888Casino website/app. The final trial that was conducted tested two designs, both intending to directly increase the use of deposit limits among the trial groups.

1. One group of new customers was shown a deposit limit option as part of the registration form.
2. Another group received a pop-up reminder after they had deposited for the first time, suggesting they set deposit limits.

The deposit limit trial ran for a fixed period between 03 June and 15 July 2020. Those involved in the trial groups were monitored for a longer period to determine if there were any longer-term impacts not covered in the initial evaluation.

**Intervention #2: 888 Control Centre**

888 worked on an existing programme to develop an area of the casino app and website that would act as a hub for all safer gambling tools and information. Principles and ideas from this project were used to develop the plan and execution of this.

The aim of the Control Centre is to provide an area where players can access a series of safer gambling tools as well as seeing other data about their play over time. The intention behind this is to give players even greater access to their data, aiming to increase awareness of their actual behaviour. The development and implementation of the Control Centre is an ongoing process.

“It’s basically an area where a customer can come and reflect on their gambling activity, have it presented to them in a very visual and easy to understand manner, and be able to at easy clicks of a button, with very appealing logos and visuals, set controls for themselves.”

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**How did 888 use the toolkit?**

Both interventions drew on important integrated safer gambling principles, aiming to influence customer behaviour in slightly different ways.

Including a mandatory deposit limits page during sign up helped to normalise the idea that setting a limit is expected by inserting it into the normal customer journey.

Giving players greater access to their data via the Control Centre aims to increase self-awareness of their actual behaviour, a key component for building long-term safer gambling habits and behaviours. We have demonstrated previously how people’s awareness of their actual playing behaviour – spend, time, win-loss etc. – is often quite different to what they perceive initially or are able to tell us about their playing habits.

The Control Centre was also designed to feel like something a customer might expect from 888 Casino, rather than something separate or for those experiencing harm. The name ‘Control Centre’, for example, was chosen over alternatives like ‘Safe Zone’.

“We thought we need to package that a little bit differently. We called it the Control Centre because we didn’t want to impress upon the customer again that this is an area where you go to if you land up in trouble… It’s like a settings page in any kind of application - we tried to give it that kind of feel”

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Yaniv Schwartz  
SVP Customer Risk Management
Key features of 888’s intervention – Deposit Limits Trial

Set targets: What behaviours were 888 aiming to change?

This intervention focused on spend as the key area to influence and took a direct approach to trying to increase the control customers have over how much they are depositing, and most likely, spending.

- Immediate term: The target goal behaviour was that people would use the deposit limits available on the site.
- Medium and longer term: The longer-term goals are to reduce the chances that people encounter gambling harm by placing limits on their spend much earlier in their customer journey (i.e. at or near to registration).

Touchpoints: What opportunities did 888 take to engage their customers?

A key feature of deposit limits intervention was placing it within the registration process – either during initial signup or after depositing for the first time.

- This removed barriers / ‘friction’ for people – making access of the deposit limit tool easier. This is one of the elements we discuss in the approach section, forcing people to engage with the intervention, or at least actively choose not to.
- It was an attempt to normalise the idea that people set deposit limits or that they are expected to do so. If, for example, setting a deposit limit was part of the registration process on every site, then all new customers would assume this is standard practice, rather than something which is currently done only by a small minority of players.

Outside of the trial

Outside of the trial, there is no prompt during signup to set a deposit limit. During the trial period, this was a mandatory part of the registration process for one test group:
Changing behaviour: How did 888 help their customers stay in control?

The focus for this specific intervention was on the use of tools, specifically the use of deposit limits.

Tone of voice: How did 888 package their intervention?

In the 888 trial the language was direct, and instructive. Given its location in the registration process the text was limited simply to instructions about what a customer could do.

It is important to note there is no perfect framing for this intervention. The choice of language can potentially be used to improve the outcomes and can be tested in just the same way as marketing content is.

Opportunities for future iterations – Deposit limits trial

The trial was focused on the practical application of inserting deposit limit setting into the customer experience, but less on using language and tone to influence how people responded to this or used the tool.

For the deposit limit and the pop-up there were opportunities to do more with the language and tone to provide people with the motivation to use/engage with the intervention.

For example, there were opportunities here to clarify additional points about how and why people might use a deposit limit:

- What it is: a way of spending no more than you intend to
- Make it seem easy: a low effort way to ensure you only spend what you intend to
- Make it motivating: give people a reason to set a limit – people could be encouraged to think about what else they might spend the money on, what their priorities are, how 888 fits into the customer’s wider life and routine.

Evaluation – Deposit limits trial

Trial details

To ensure the trial could be evaluated effectively, the 888 team ran a randomised control trial. Each part of the trial – the registration deposit limit and the post first-time deposit limit reminder – had a different target group, each with a matching control group who received no intervention.

The registration deposit limit was targeted at players who are considered to be “higher risk” based on some additional risk factors identified by the 888 team and collected at registration.

The post first-time deposit limit reminder group was a sub-section of all customers making a first-time deposit.

Key outcome(s) being measured

- Proportion of customers setting a deposit limit within 7 days of setting up their account (for evaluating the deposit limit tool).
- Proportion of customers setting a deposit limit within 7 days of their first deposit (for evaluating the first-time deposit prompt).
- Value of deposit limits being set (only defined for those who do set a limit).
- Total relative value of deposits over the trial period.
- Proportion of customers being flagged as potentially experiencing harm (according to 888’s internal measures).

An independent impact evaluation of data has been conducted and will be published separately.
Key features of the intervention – The Control Centre

Set targets:
What behaviours were 888 aiming to change?

This intervention focuses on a range of behaviours, but ultimately rests upon the idea of giving players greater and more immediate access to information about their own play.

- Immediate term: The target goal behaviour is that people will use the zone to check their own data, raising awareness of personal behaviours.
- Medium and longer term: The longer-term goals are to reduce the chances that people encounter gambling harm by providing players with greater awareness of key metrics such as time spent playing, win-loss, and deposit amounts.

Changing behaviour:
How did 888 help their customers to stay in control?

The primary element of safer gambling behaviour the Control Centre addresses is self-awareness, empowering players with detailed information about their activity on 888.

Within the Control Centre, there are opportunities to provide people with more information about why they might want to use or take note of certain pieces of information.

Tone of voice:
How did 888 talk to their customers?

Over the programme, we had a number of discussions about the tone and language used within the Control Centre, including around its naming. We also tested some initial language ideas with 888Casino customers as part of the comms testing, and the 888 team continued to test ideas and iterations with users as they developed the Control Centre further.

888Casino players we engaged liked messaging that felt subtle, disguised but also 'genuine'. Anything too obvious or clinical was seen as something the operator was doing because they had to by law. The more personalised interventions and messages were, the more likely they were to appeal to customers. Reactions to early mock-ups of the Control Centre focused on this idea – "[it's] responsible gambling in disguise – they’re not pushing it on you".

The name itself came from testing ideas with users – originally in development as the “Safe Zone”, the name Control Centre was seen as far more accessible to all customers and aligned with the aim for customers to take control of their data and stats.
The 888 team have engaged a creative agency to help with the language used in the Control Centre, ensuring it aligns with their brand look and feel. While a seemingly small element of the process, this is an important example of approaching safer gambling with the explicit intention of ensuring it is relevant and accessible for customers.

**Opportunities for future iterations**

Though the development of the Control Centre is an ongoing process, there are some key opportunities for future iterations.

Integrating elements of the Control Centre in more places across the journey provides further opportunities for players to engage. This could even take the form of a miniature Control Centre that is always visible, displaying key information to improve awareness of behaviour (e.g. profit and loss) and signposting customers to tools in the moment.

**Looking forward: project legacy**

The 888 team are keen to use learnings from both workstreams to continue to integrate safer gambling messages and interventions into the customer journey:

“One of our ideas for the future is taking those elements, which have been made very user friendly and easy to use... and implementing those at different touchpoints during the customer journey that they are more relevant for. What we have then is a language throughout the customer journey where these tools are being recommended to customers at the most relevant points.”

**Yaniv Schwartz**
SVP Customer Risk Management

The 888 team also expressed excitement about continuing to use the principles of the project to normalise safer behaviour across their customer base:

“We’re here for the customer to enjoy the games. We don’t want to profit from anyone who the games are not intended for. The way we’re thinking about it now is this normalisation of responsibility into everything that we do. So that ultimately everything that you’re left with... is just an entertaining environment that’s safe for customers to enjoy.”

**Yaniv Schwartz**
SVP Customer Risk Management

Similarly, the development process should ensure messaging best motivates customers to stay in control and makes doing so easy. Prompts to set or change deposit limits could include copy to justify why having them in place is important. The ordering of content in the Control Centre should also make remaining aware of behaviour easy. The most useful stats/data according to customers was profit and loss.

Specific design features within the Control Centre also need careful attention – as found when testing mock-ups with users, simple design choices like having a progress bar to show how much of a deposit has been spent can be interpreted by customers as a target to work towards rather than a cap to avoid hitting.
**Betfred.com (digital)**

Overview: using new touchpoints and language to engage customers who wouldn’t normally see safer gambling messages

The Betfred team ran a communications-focused intervention targeting a wide range of customers, including those considered “low” risk. The key aim for these communications was to improve self-awareness among players of their own gambling activity – one of a number of areas integrated safer gambling approaches focus on. To try and land these messages successfully with their customers, the Betfred team employed a change in tone from their normal safer gambling content, and utilised new touchpoints previously unused for safer gambling-focused comms. A combination of email, SMS and the rich inbox embedded in the website and app were used to reach players directly.

**Betfred’s intervention**

The team developed new communications targeted at two different audiences:

- Customers who would not normally receive any targeted safer gambling messages or interventions from the responsible gambling team, but who had been identified as being slightly higher risk than the “low risk” customers (based on time spent playing on the site).
- Customers who are considered “higher risk”.

The aim was to test the effectiveness of different styles of messaging to Betfred’s normal safer gambling communications, presented to customers at points in the customer journey where safer gambling content is not normally seen.

The communications were developed and implemented during the spring and summer of 2020, during COVID-19.

**Impact of COVID-19**

Betfred’s digital interventions were developed after the COVID-19 lockdown and referred directly to the current situation.

“We were concerned that doing a trial during the pandemic wouldn’t be the right time, but we were committed to understanding if there was more that we could do to prevent customers developing potentially harmful behaviour. We wanted to ensure that customers were reminded of the tools available and that they were informed about their gambling behaviours, so they can make informed decisions.”

**Norma Campbell**
Head of Digital Compliance, Betfred
An Integrated Approach To Safer Gambling
Operator Case Studies

Key features of Betfred’s Intervention

The key principles employed by the Betfred team revolved around language and tone of communication, with a specific focus on encouraging self-awareness.

Set targets: What behaviours were Betfred aiming to change?

- **Immediate term**: Time spent playing is an important marker of harm for the Betfred team. Particularly during COVID-19, the Betfred team wanted to ensure that people were aware of spending increased time on the site/app and, if they were, ensuring decisions to play more were being made consciously.
  
  The immediate actions the communications were intending to elicit from customers were reflection on their play behaviour and time spent gambling, as well as use of the existing safer gambling tools available on the site/app.

- **Medium and longer term**: The longer-term intentions were for customers who received the interventions to have more stable patterns of play and spend, and to reduce the likelihood they experienced gambling harm in future (identified by triggering existing harm identification measures in place). The trial was too short to determine if this outcome was achieved, but the Betfred team intend to continue monitoring the cohorts to analyse outcomes from 6 months and onwards.

Touchpoints: What opportunities did Betfred take to engage their customers?

- The Betfred communications happened at a number of points in the journey. The messages were focused on established players and were targeted directly, utilising email, SMS and the rich inbox embedded in the website and app.
  
  Including other comms channels, particularly SMS, was important for the Betfred team as they know from experience that phone interactions tend to have far higher rates of success than emails which can often go unread.

- Comms were sent out on a regular basis, with targeted customers receiving a communication every month over a 6-month period. Different channel combinations were used so the team could assess which approach had the greatest success rate in terms of customer interaction.

Changing behaviour: How did Betfred help their customers stay in control?

- **Self-awareness**: The content of the communications focused on encouraging people to question their behaviour and reflect on whether they are playing within their boundaries (e.g. "Are you spending more time gambling than before?")

- **Strategies and tools**: The communications pointed people to the safer gambling tools available on the Betfred site/app, but also encouraged people to develop their own strategies, specifically around planning how much to spend and how long to play.

- **Understanding of games and gambling**: The messages used were intended to directly address some common misconceptions with gambling, taking a very matter of fact tone to set expectations and remind customers of the realities of gambling: "The fact of the matter is the more you gamble, the more likely it is you will lose even more money".

Tone of voice: How did Betfred talk to their customers?

- **Inclusivity**: The messages developed by the Betfred team specifically referenced COVID-19, as a lot of communications over this time have done, with the hope this would increase the relevance to a lot of customers with everyone being in a similar, unusual, situation. The recommendations in the comms were described as "tips that people find helpful", intentionally avoiding the use of any terms or phrases that suggest tools and strategies are not universally important for players.

- **Input from customer research and comms testing**: During comms testing a common perception among customers was that talking directly and honestly about the risks of gambling was preferable. From their perspective, it helps to foster a sense of trust with the operator and a belief that the safer gambling messages were sincere.

- **Encouraging self-awareness**: For one group of customers the Betfred team implemented a trial in which customers were sent a breakdown of some key playing behaviours / statistics. The intention was to get these customers to reflect on whether the information they were being shown matched their expectations. This targeted approach used data points such as the amount
of time spent playing, the percentage of activity after midnight, deposit values, and how some of these had changed over the previous seven days.

**Actively encouraging certain behaviours**

The straightforward messaging used in some of the Betfred comms encouraged people to adopt strategies for managing their time outside of the tools available on the site or app (e.g., “Plan ahead and decide how long you want to gamble for”). The language was used to set an expectation that people would and should be using tools and reflecting on their behaviour (e.g., “here’s some tips on things you should do”).

**Opportunity for future iterations**

The intervention was focused on getting some new messages in front of customers, using new built-in touchpoints and using a trial to determine whether they had any impact. There are some areas which this specific style of intervention can benefit from in future iterations:

- Utilising the digital marketing and design teams to further develop the messages as well as the look and feel of the intervention. This would help to integrate the messages in terms of style and visuals, as well as tone.
- Testing the messages with customers to provide actionable feedback would have been a valuable exercise had the team had time.

**Evaluation**

**Trial details**

The Betfred team set up a randomised control trial, with several treatment groups receiving different combinations of new safer gambling communications (email, SMS, rich inbox) and a control group who received no new communications.

Analysis was focused on differences between the groups in terms of key metrics such as uptake of the site’s safer gambling tools, as well as a range of safer gambling indicators the Betfred team track. Overall time spent playing, and patterns of time (e.g., amount of time spent in the early hours of the morning), were particularly important.

**Outcomes**

An independent impact evaluation of data has been conducted and will be published separately.
Outcome – operator reflections

“The trials were very informative and have provided us with a basis upon which to build our messaging and how to deliver those messages to ensure that they have the greatest impact. We are now working on a larger trial taking into account the lessons learnt and outcomes that came out of this trial.”

Norma Campbell
Head of Digital Compliance, Betfred

Looking forward: project legacy

The Betfred digital team are hoping to continue using the principles in their safer gambling communications to customers. A key aspiration for the team is to set up a long-term programme, tracking customers through their whole journey with Betfred and developing a suite of new interventions and communications that can be integrated throughout.

“The initial results were encouraging and being able to build upon them is a key focus for the safer gaming team in the coming months. This approach supports our focus upon ensuring our customers are informed so they can enjoy gambling in a sustainable way.”

Norma Campbell
Head of Digital Compliance, Betfred
Overview: integrating new safer gambling messages into a high-profile marketing campaign

As part of this project the Betfred marketing team were engaged to help develop new safer gambling messages that could be integrated directly into advertising and marketing materials developed for the Cheltenham and Aintree festivals in March and April 2020. These updated materials included short, simple slogans that were tested with Betfred customers and trialled in 20 stores. With the marketing team on board, the resulting creatives looked markedly different from the separate safer gambling resources usually on display.

The target audience was broad, and the communications were designed to be relevant for all land-based customers. The team also had a particular target audience of new, first-time customers in mind.

The commitment from Betfred to test the new campaign over Aintree and Cheltenham demonstrated the enthusiasm the team had in this new approach and the buy-in they were able to secure internally.

Impact of COVID-19

Unfortunately, while the creatives did go up in the trial stores, the COVID-19 lockdown on March 23rd, 2020 meant that the intervention was never in place for long enough to be trialled fully.

Key features of Betfred’s interventions

Employing the skills of the marketing team was key to the development of the new messages and creatives. The elements of the toolkit that were most relevant were tone of voice use in the messages and the touchpoints where they would appear.

Set targets:
What behaviours were Betfred aiming to change?

- A key focus of the messages developed by the Betfred team was customer spend. The messages were trying to communicate that people should be setting a budget before gambling, sticking to it, and reflecting on what they had spent afterwards.
- With new customers as a particular target, the team felt it was especially important to have messages that set expectations about people’s gambling behaviour early.
- Impact of COVID-19: Due to the COVID-19 lockdown on March 23rd 2020 the Betfred team were only able to collect very limited data on the retail interventions.

Touchpoints:
What opportunities did Betfred take to engage their customers?

- The new safer gambling messages were displayed at a number of points in the retail journey, some of which were not normally used for safer gambling messages.
- The large advertising banners intended to draw people in were likely to be the first place the messaging was seen, while other in-store adverts and communications were also used, such as TVs, leaflets and betting slips. The intention was that someone in-store would struggle to miss the messages but would not see them as standing out from everything else in a negative way. The messages were consistent at different touchpoints, even if someone is only in-store for a short period (e.g. popping in to place a bet).
- Alongside the in-store communications, the Betfred team also used the store’s social media accounts to share the creatives.

“It was challenging at first, but once we got into it there was a lot of enthusiasm within the team to do this kind of messaging”

Kevin Purnell
Head of Retail Compliance, Betfred
An Integrated Approach To Safer Gambling  |  Operator Case Studies

Changing behaviour:
How did Betfred help their customers stay in control?

- **Self-awareness:** Betfred’s messages focused on self-awareness – encouraging people to plan and reflect on their behaviour (e.g. “Set your budget, watch your spend”).

Tone of voice:
How did Betfred talk to their customers?

- **Brand:** Where most safer gambling content was usually designed separately from normal marketing material, a key change for the Betfred team was integrating the new messages directly into the marketing creatives. They utilised brand colours, font and general aesthetic, as well as where they were positioned in the creatives, to try and make them far less distinguishable and avoid them being considered as safer gambling ‘add-ons’.

- **Tone:** The messages developed by the Betfred team were intended to be simple and straight-talking, matching the tone that Betfred uses in all its other communications with customers.

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Evaluation

**Trial details**

The Betfred team had set up a trial, with 20 ‘test’ stores carrying the new creatives and messaging. Pre and post intervention data was going to be collected in the form of a customer survey, qualitative interviews with staff and collection of management data. The trial stores would be compared with a set of control stores which did not have any of the new messaging.

The trial was cut short by the COVID-19 lockdown on 23 March 2020, and it was not possible to conduct an evaluation of the trial.

**Key outcome(s) being measured**

Outcomes in the customer survey focused on people’s perceived propensity to consider and reflect on how much they had spent; whether they were happy with their own behaviour, as well as awareness of the messages and communications.

The Betfred team also intended to capture more novel data – such as staff incident reports in the trial stores – to try and ascertain whether the campaign had any impacts on customer behaviour beyond the attitudinal and self-reported data from customers.

Interviews with staff would complement this, providing insight into perceived customer behaviour and attitudes from the perspective of the staff.
An Integrated Approach To Safer Gambling | Operator Case Studies

Genting Casino

Overview: using new touchpoints to reach customers with safer gambling messages

The Genting team developed and implemented a number of new customer communications as part of this project, utilising new touchpoints in the retail and digital customer journey. In casinos they rolled out new messages on gaming machines and even used the ATM display as a new opportunity to deliver a safer gambling message to customers. Affordability and safer gambling emails to customers during COVID-19 employed a more casual, friendly tone than had been used in safer gambling communications previously, hoping to engage more effectively with the audience.

Impact of COVID-19

Due to the COVID-19 lockdown on March 23rd 2020 the Genting team were only able to collect very limited data on the retail interventions.

Key features of Genting’s intervention

A key part of the toolkit the Genting team embraced was thinking about all the touchpoints in the gambling environment that could be used to deliver safer gambling messages.

Targets: What behaviours were Genting aiming to change?

The retail intervention focused on the time spent playing. All the messages encouraged people to use safer gambling tools provided on the Genting site and machines.

Touchpoints: What opportunities did Genting take to engage their customers?

In the retail environment, the messages were displayed in new locations not previously used for safer gambling messages: secondary screens on the gaming machines and on the ATM. The messages were not across the entire customer journey, but the Genting team saw the importance of trialling the messaging in new, novel points where they interact with customers.

(Below – the ATM screen message. The ATM was identified as one of many touchpoints when we mapped out the customer journey with Genting customers, and the Genting team identified an opportunity to have a bespoke message added. Left – the email sent to all customers during COVID-19).
Changing behaviour: How did Genting intend to help their customers remain in control?

- **Self-awareness**: The messages in casinos were intended specifically to get players to reflect on the amount of time spent playing. The messages were tied to specific times and aimed to make it clear to customers exactly how long they had been on the machine.

As the Genting team explained:

“Reality checks are for all customers, whether or not a card is used. On play commencing, the timer will start on that machine, and on every hour reached whilst playing the customer will be presented with the following messages. We have gone from green to red in an attempt to visually escalate the seriousness of the message in relation to the time spent on the machine. We have also used variations in the messages to highlight different options for the customer.”

**Ross Ferguson**
Head of Responsible Gambling
Genting Casino

**Evaluation**

**Trial details**

The aim was to rollout the messages on screens across a large number of Genting casinos, providing a trial group that spanned the country and could be compared with a control group of casinos that did not receive the intervention. Unfortunately, the COVID-19 lockdown on 23 March 2020 meant the trial was significantly impacted.

An independent impact evaluation of data has been conducted and will be published separately.

**Opportunities for future iterations**

The retail trial could have used additional touchpoints in the customer journey – during the customer research phase some respondents had described how they did not tend to look at/notice the screens used for the trial.

The digital trial was limited in scope to emails to players – it would certainly have been interesting to know if additional use of customer touchpoints in the digital journey engaged players more or differently.

**Outcome – operator reflections**

“Ultimately we are achieving a better experience for the customer. Hopefully what this does is reduce problematic play… It allows the customer to have a better experience. And that’s ultimately what we want to achieve – we want to look after the customer, we want the customers to be happy, and enjoy coming to the casino or playing online.”

**Ross Ferguson**
Head of Responsible Gambling
Genting Casino
Appendix 1: Glossary
Safer gambling:
Safer gambling is a term used to describe the industry’s approach to limiting the risk of people experiencing gambling harm and problem gambling\(^2\). The term is often used interchangeably with responsible gambling and can also be referred to as the industry’s ‘social responsibility’.\(^2\)

Safer gambling removes some of the onus from the player and shares it with the gambling product or place. Safer gambling is the preferred term in this report.

Interventions, communications and messaging:
We talk throughout about the idea of ‘interventions’, ‘communications’ and ‘messaging’. All are important and there is a reasonable amount of overlap, but for clarity what we mean by these is:

- **Intervention**: the action or process an operator puts in place to encourage or enable a customer to behave in a certain way. An intervention might rely on messaging but might also be broader than this (e.g. providing a customer with information about their playing behaviour).

- **Communications**: specific interactions with a customer that rely solely on communication to inform customers or influence a behaviour (e.g. an email or website/app pop-up).

- **Messaging**: the actual words, phrases used to encourage a customer to do something or do something in a certain way (e.g. the words that sit around a customer’s playing behaviour data, recommending they regularly review it to keep on top of their spending, for example).

When we refer to interventions throughout, we are referring to the wide range of safer gambling activities employed by operators and the messaging and communications within that. At other times we will refer specifically to messaging and communications where this is the focus of the section or relevant to specific examples from this project.

‘Integrated’ safer gambling:
This is the concept of developing a holistic approach to safer gambling which has long-term prevention as its focus. It involves teaching and reinforcing safer gambling behaviour and attitudes as default, rather than as a reaction to negative indicators or potential harm. It relies on embedding safer gambling consistently throughout the customer journey; iterating and developing safer gambling approaches based on what works and utilising skills in marketing, behaviour change and design to do so.

‘Current’ or ‘compliance-led’ safer gambling:
This refers broadly to the approach taken to safer gambling by the industry at the time of writing. It focuses primarily on safer gambling interventions that sit outside the day-to-day customer experience and are designed to comply with current regulations. These approaches tend to focus on warning customers about experiencing harm, rather than encouraging and enabling customers to play safely. Compliance-led safer gambling also tends to place emphasis on identifying and supporting customers who have experienced harm. The concept is explored in the report in more detail (also see Appendix 2).

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27 We are referring here to the diagnosable condition “problem gambling”, as recognised by the Royal College of Psychiatrists. Gambling harm covers a far broader set of experiences that are not diagnosable in the same clinical sense.

28 [https://www.safergamblingstandard.org.uk/what-is-the-standard/what-is-safer-gambling/](https://www.safergamblingstandard.org.uk/what-is-the-standard/what-is-safer-gambling/)
Appendix 2: Summary of customer research
The importance of customer perspectives

Customer perspectives are crucial for developing integrated safer gambling interventions. Interventions intend to engage customers and influence their behaviour, so grounding them in customer needs is crucial. Even if an intervention seems likely to have a positive impact in theory, if it does not land with customers it is unusable.

Customer perspectives are a key element in a culture of iteration, testing and evaluation. They allow us to identify opportunities, ensure interventions are impactful, and then review how well they work.

Customer perspectives also help to frame the need for an approach that goes beyond compliance-led safer gambling. Being able to show operators how their current approaches to safer gambling are actually experienced by customers is a vital way to bring their work to life, challenge their assumptions, and reinforce the need for an integrated approach.

This project encouraged operators to use customers’ perspectives at two points in the intervention development process:

1. Auditing current experiences of safer gambling to aid intervention development
2. Comms testing during intervention development

Phase 1: Auditing current experiences of safer gambling to aid intervention development

Phase 1 intended to explore how customers experienced operators’ existing safer gambling interventions and messaging and help them identify opportunities for designing integrated safer gambling interventions.

Phase 1 also allowed operators to check their assumptions about what effectively engages customers and helps build motivation to commit to integrated safer gambling.

Phase 1 objectives:

- Use customer experiences to identify opportunities to develop integrated interventions

Specific areas of focus included:

- Which safer gambling messages and interventions do customers see and not see?
- How do they interpret the safer gambling messages and interventions they do see?
- What operator tools do they use and how?
- Which of their own strategies do they use?
- How do customers perceive operator brands, and what sorts of communications feel appropriate?

Phase 1 methodology:

We explored customer experiences across all 5 participating operators.
For each participating operator, we interviewed and conducted shadowed play with 3 customers (for a total of 15 customers).

Interviews were conducted from December 2019 to February 2020. All names used in this report are pseudonyms.

**Sampling considerations**

The customers for each operator were chosen to represent a range of demographics, including age, gender, ethnicity and socio-economic group.

They were also selected to demonstrate a range of gambling behaviours, including frequency and spend.

As an integrated approach aims to make safer gambling relevant to all customers, we were not looking to talk to those who had experienced gambling harm, instead hoping to talk to a range of ‘typical’ customers.

Customers were recruited through a combination of free-find recruitment partners, operators, and by our researchers during site visits.

**The methodology had three key phases:**

- **Depth Interviews:** In-home interviews lasting 2–3 hours to understand the customer’s wider life and in-depth exploration of their gambling routines, perceptions of messaging and attitudes to operators.

- **Shadowed Play:** Following the depth interviews, we accompanied respondents as they played with their chosen operators. This allowed us to see in real time how they interacted with existing messaging – going beyond self-reported reflections to see their real behaviours. We also looked at their historic play, for example examining their online play history.

- **Intercept Days:** For operators with land-based venues, we visited their venues, observing existing messaging, staff behaviour and conducting impromptu interviews with customers.

**Key findings from Phase 1:**

Many of the findings from phase 1 were operator-specific, for example helping them to understand customer experiences of engaging with their brand, or the awareness and appeal of particular safer gambling touchpoints.

However, there were some overarching findings that fed into the changes operators made when designing integrated interventions. These findings are consistent with a wide range of research with people who gamble.

**Awareness of safer gambling messaging and comms is low**

Across both online and land-based operators, awareness of safer-gambling communications was uniformly low.

Even when the safer gambling messaging was visible to people, customers often did not notice it, felt it was not obvious, or that it was obscured by other messages.

This was true even at sign-up, which is where the majority of messaging is currently targeted.

“You aren’t going to go back, check your emails or read all of that stuff, you just want to place the first bet!”

*Sean, 21*

Even when customers were aware of interventions or messaging, these tended to feel separate from their broader gambling experience. Safer gambling was seen to be an ‘add-on’ to the rest of their experience (e.g. other comms from the operator), and quickly faded into the background, particularly during the excitement of play.

In some cases this meant that customers who were aware of messaging or interventions had become ‘numb’ to the message itself – though they might be able to repeat...
straplines through familiarity, they were not aware of or had not acted upon any calls to action.

“It’s plastered with them… it’s meaningless because I’ve read it a million times”

Ross, 63

Low awareness of messaging and interventions tended to correspond to low awareness of the safer gambling principles that the messaging tried to get across. As a result, customers also had limited awareness of tools, and struggled to locate them when prompted.

Current safer gambling messaging and interventions did not feel relevant to most customers

Even when aware of messaging or interventions, most customers felt these were not aimed at them, but instead at those with ‘problems’. The way that most messaging was pitched, or the existing associations customers had with messaging of any kind, meant that it was commonly dismissed as not relevant.

‘I think it’s a good idea, but I don’t have a problem so I wouldn’t read them’ [SG Leaflets]

Dan, 37

Similarly, customers frequently felt that safer gambling messaging was in place for ‘statutory reasons’, rather than as an integrated or seamless part of their experience. Again, this meant that such messaging was easily dismissed.

“They say ‘good luck’ and give you the Gamble Aware card… if they said anything else, you’d be frightened”

Archith, 34

If safer gambling messaging does not feel relevant, then neither do tools

In the same way that most safer gambling messaging did not feel relevant, tool use also tended to be unappealing. Though many felt that tools were a good idea, they did not see them as relevant to their own experience. In some cases, customers were only aware of tools aimed at those already experiencing harm, like self-exclusion.

In the few cases where customers were using tools, as they did not feel relevant, they tended to be used ineffectively. For example, one respondent was using a deposit limit but had set it deliberately high so as not to change the way she played.

This does not mean these customers are not at risk

However, despite a widespread disavowal of safer gambling messaging and interventions as being for those with a ‘problem’, most customers exhibited behaviours that indicated they were at risk of, or were already experiencing, harm. One of the benefits of shadowed play was that we could verify customers’ claims about how they played using their real behaviour (either through observing play in real time or reviewing their historic play).

Risky behaviours included gambling outside of self-imposed limits, lack of awareness of their historic profit and loss ratios, focus on wins over losses, and also consequences in their wider financial life (e.g. struggling to pay off debts).

For example, one respondent claimed to spend no more than £20 a day, and that she had set a deposit limit for this amount. However, on reviewing her account history with a researcher, she had recently increased her deposit limit to £400 per day and would frequently make multiple deposits within a short space of time – often depositing up to £60 per day.

Phase 2: Comms testing during intervention development

As part of the iterative development process, we also helped operators test their intervention ideas with customers. Findings from this phase, along with internal testing processes run by operators, were then used to improve interventions. The groups were run during January and February 2021.

Phase 2 objectives included:

- Exploring customer perceptions of proposed integrated safer gambling messages and interventions
- Understanding what operators could do to improve their proposed materials

Phase 2 Methodology:

We conducted comms testing groups covering proposed interventions for all participating operators.
Where operators had proposed online and land-based interventions, these were tested separately.

Sampling considerations
As above, customers were chosen for their regularity of play with each operator and to represent a range of demographic characteristics and gambling behaviours (e.g. spend and time). These were chosen to be “typical” customers with the relevant operator, rather than those who had experienced serious gambling harm.

Comms testing groups
Each of the 5 comms testing groups had 6-8 customers and lasted 90 minutes. Customers were encouraged first to discuss reflections on operator brands, and then to reflect on the appeal and relevance of mock-ups of proposed interventions.

This process obviously could not replicate the experience of encountering messaging and interventions during an authentic customer journey but was a useful proxy.

Findings from comms testing
Findings differed for each operator but helped to ensure operators were using the principles underpinning an integrated approach. For example, the groups provided reflections around the impact of using certain touchpoints within the customer journey, how tone of voice and association with brand influence the relevance of messaging, and whether interventions were likely to influence customer behaviour. Following the groups, operators were given a summary of the findings and some simple recommendations.

Not all findings from these groups were incorporated into operators’ eventual interventions. Some examples of where findings influenced the development of messaging and interventions include:

888 Casino – The Control Centre
Customers responded positively to the idea of a Control Centre to display historic patterns of play and signpost them to tools.

Customers felt that more ‘neutral’ names – names that did not reference safety or responsibility, but which focused on play or statistics – were more appealing. For example, customers felt that names like ‘Safe Zone’ felt negative and were more likely to be ignored.

“It’s responsible gambling in disguise... they’re not pushing it on you”

888 Casino Customer

Customers also had a preference for the Control Centre to be positioned somewhere ‘permanently there’, that could be checked at any time. This was factored into the Control Centre design, with the 888 team intending for it to sit permanently within the site/app menu.

Gamesys – #Sharethejoy
Participants liked the proposed messaging within the #Sharethejoy campaign. While positive responses to messages does not tell us if they will be effective, it was important that customers reacted favourably, as many did actively reject the idea of engaging with more overt safer gambling messaging. The tone of the messaging also resonated with participants as something that aligned with Jackpotjoy’s brand and felt relevant to their personal experience.

Customers also responded most positively to the more ‘playful’ session reminders, like “It’s been 30 minutes. You’ve earned yourself a tea break”. This aligned with Gamesys eventual reworking of their session reminders.
Appendix 3: Methodological overview
Methodological overview

This section provides a brief overview of the overall project process that operators and the Revealing Reality team worked through. Full methodological notes covering the primary research elements of this work can be found in Appendix 2: Summary of customer research.

Project objectives

The specific objectives set out at the beginning of the project were:

› To develop practical applications of harm minimisation for the gambling industry
› To deliver best practice principles
› To develop some specific tested and evaluated ideas which are consistent with those principles and can be used widely across the industry

Note on the impact of COVID-19 on the project

COVID-19 disrupted the overall project quite dramatically. Most notably, the closure of all land-based gambling venues on 24 March 2020 meant that none of the retail-based interventions could take place. Significant amendments to some of the digital interventions were also necessary.

The wide-ranging impact on businesses – in terms of redundancies, furlough and changes in working practice and priorities – also raised challenges in ensuring the project continued to be a priority for participating operators. There were also knock-on effects for the feasibility of conducting evaluations based on pre-to-post analysis.

However, the digital operators were able to implement their interventions either in the original form or adapted in response to the situation. In some cases, this meant using the principles and ideas explored as part of the project to inform their COVID-related safer gambling response. Despite the disruption COVID caused, it also provided an opportunity for operators to take the principles and approach and apply them (although in an unusual environment).
Project stages

The project ran between June 2019 and August 2020 and had multiple stages and parallel strands of work. Broadly it followed a linear process, outlined in the diagram below.

Phase 1

On-boarding operators
- Initial conversations and meetings
- Operator workshop

Development of intervention brief and toolkit
- Create design brief for operators
- Create safer gambling behaviour change toolkit (see Part 2)
- Take operators through toolkit and provide ad hoc direction

Customer research
- In-depth qualitative research with customers from all participating operators (feed into intervention development)
- Ad hoc feedback to operators

Phase 2

Intervention and messaging development
- Operators respond to design brief with intervention plan
- RR team review and feedback
- Operators develop first designs/iteration of intervention
- RR team review and feedback
- Second iteration interventions and comms tested with operator customers
- RR team feed back to operators

Intervention implementation
- Operators develop intervention and evaluation plans
- Pre-intervention data collection (where relevant)
- Interventions live

Phase 3

Evaluation reporting
- Operators evaluate intervention data and BIT
- Reports written
On-boarding operators

Operators were approached by the Gambling Commission and invited to join the project. Once interest was registered, the Revealing Reality team met with the operators to talk in detail about the process and vision for the programme.

All of the operators were brought together for a workshop, providing an opportunity for all operators to share their perceptions of the challenges and opportunities in the project, and to ensure there was a shared vision for what the project should try to achieve as well as its objectives.

The following operators began the project: Betfred; 888; Gamesys; Victoria Gate Casino; Praesepe; Genting UK and Buzz Bingo. Victoria Gate and Praesepe withdrew from the project in spring 2020.

Development of intervention brief and toolkit

We developed a design brief for operators to respond to. Sitting alongside this was a toolkit that explained various elements of the design process and behaviour change theory that would underpin the interventions. The toolkit explained and expanded upon the underlying principles for designing interventions (all of these elements are covered in detail in the “How” section of this report).

Customer research and journey mapping

We conducted in-depth qualitative interviews and observation with customers of each of the participating operators. The intention was to understand their experience of safer gambling interventions and messages so that this perspective could feed into the development of the interventions. We also mapped every touchpoint that participating operators have with customers, to help them identify opportunities for interventions.

Details of the research approach, including sampling and analysis can be found in Appendix 2: Summary of customer research.

External evaluation

A key aim for the project was to work with operators to develop pragmatic ways to evaluate and test their interventions. The intent was to deliver high quality evaluations in every instance, while ensuring the approach used is something replicable for the operator. Without replicable evaluation, the ability to iterate and test is limited. Operators were encouraged to consider:

- How these specific interventions could be tested utilising appropriate trial design
- How existing approaches used across their business could be applied to safer gambling interventions and messages (e.g. the same way marketing exercises are evaluated for success)
- How these specific interventions could be tested utilising appropriate trial design
- How the planned interventions and others transferred the principles across to their COVID-19-related safer gambling response. Wherever possible, data was collected and analysed to determine the effectiveness and impact of the interventions. This data was shared with BIT for a separate impact evaluation.

BIT were commissioned to run an independent evaluation on the effectiveness of the individual interventions/ trials developed by the operators (impact evaluation), and how well the general process that operators went through during the programme worked in helping them to innovate (process evaluation). The BIT team provided guidance and recommendations to operators around evaluation planning and delivery.

This directly supports the National Strategy to Reduce Gambling Harms, specifically the evaluation enabler

The Behavioural Insights Team, acting as the independent evaluator on the project, provided guidance to operators as well as conducting a formal impact and process evaluation of the project. This provided learning opportunities around evaluation design as well as the opportunity to share the detailed outcomes from each operator’s set of interventions more widely.

29 See Appendix 2: Summary of customer research for further information
30 BIT were commissioned to run an independent evaluation on the effectiveness of the individual interventions/ trials developed by the operators (impact evaluation), and how well the general process that operators went through during the programme worked in helping them to innovate (process evaluation). The BIT team provided guidance and recommendations to operators around evaluation planning and delivery.
31 This directly supports the National Strategy to Reduce Gambling Harms, specifically the evaluation enabler
32 The Impact and Process evaluation reports will be published in early Spring 2021
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