Gambling Related Financial Harm:
A framework for continuous learning in organisations

September 2020
Purpose

The purpose of this document is to develop consistency between different professional sectors on the topic of gambling related financial harm, and to provide the process to ensure continuous internal learning on the subject.

It is aimed at anyone working in financial services, gambling businesses, gambling support services or money guidance services, but may be particularly useful to learning and development leads, and those leading on vulnerable customer work.

The framework intends to provide top level guidance on the content and mechanisms for ensuring continuous learning and development.

Methodology

This document is part of the Gambling Related Financial Harm Toolkit.

The framework has been developed in consultation with several organisations across the relevant sectors, including financial services, gambling businesses, gambling support services and money guidance organisations.

In this document, “gambling related financial harm (GRFH)” refers to negative experiences by an individual or relating to the interaction between gambling and finance. Examples of GRFH include: debt due to gambling and/or poor credit score due to gambling.

This documents refers to those with “lived experience” and “experts by experience”. This refers to people who have experienced harm related to gambling in the past, either because of their own gambling behaviours, or the gambling behaviour of someone close to them.

In this document, the word “customer” is used to refer to any member of the general public that an organisation may interact with.
How to use this framework

The suggestions in this document are intended to act as a stimulus to further specific conversations in each organisation and teams within organisations.

The framework is split into seven points, which are divided into two sections: implementation strategy and advised content.

1. Assess staff needs for continuous learning on gambling related financial harm
2. Identify touchpoints for continuous learning on gambling related financial harm
3. Evaluate and regularly review continuous learning
4. Equip staff with core information to mitigate gambling related financial harm
5. Use key messages to underpin learning
6. Use case studies and lived experience to enhance awareness and interaction
7. Reinforce soft skills to support work

There are three appendices, which offer additional support to implement areas of this framework. It is advised that this resource is used alongside the other resources in the Gambling Related Financial Harm Toolkit.
Section One
Implementation strategy

This section sets out guidance for ensuring continuous learning on gambling related financial harm. GRFH is an issue that intersects with many other subjects, including psychological, social and financial issues. Although gambling related harm and financial harm are inextricably linked, there is a constantly changing landscape of factors impacting customers’ experience. As such, there are several opportunities for organisations to ensure continuous learning on this topic, both within existing activities and stand-alone pieces of work.
1. Assess staff needs for continuous learning on gambling related financial harm

GRFH intersects with many different operations within organisations. As such, it is recommended that organisations assess which departments, teams and staff members in your organisation may:

- interact with customers experiencing GRFH, or
- influence organisational direction related to GRFH

By compiling a roster of staff who may interact with customers affected by GRFH, organisations will be better equipped to assess who requires training or additional learning, and how this might be administered. A suggested framework is drafted in Appendix 1.

The recommended teams and departments that should be considered for learning and development on GRFH:

- Strategic staff – influencing internal/external policies, strategies and communications relating to GRFH
- Frontline staff – working directly with the public, able to exchange insight and information with customers on gambling harms
- Communications staff – staff responsible for creating external facing messages relating to gambling related harm e.g. social media posts, letters to customers, website information.

Gambling awareness training and further learning should be particularly relevant to staff that work or specialise in the following:

- Vulnerable customers (including addictions, mental health, economic abuse)
- Financial inclusion and wellbeing
- Collections and recoveries
- Customer experience
- Technology and systems
- Communications and marketing
- Product and innovation
2. Identify ‘touchpoints’ for continuous learning on gambling related financial harm

Touchpoints in organisations will vary greatly depending on the nature of work, resource distribution and existing learning and development strategies. Listed below are some opportunities for learning on GRFH:

- **Mandatory training** – Organisations that have mandatory training for staff should include information and skills to deal with GRFH. This could be administered through reading lists, online or face-to-face learning.

- **Additional subject training** – Where organisations already have some information on gambling related harm or financial harm, they may be able to add in optional modules for staff to complete. This could be developed internally or by using a third party (see p.10: Appendix Two).

- **External events** – There are numerous events run by charities, research bodies and trade bodies on the issue of gambling related financial harm. It may also be beneficial to attend finance and gambling specific events to intersect the issue.

- **Use of internal communications** – Organisations should utilise internal communication methods such as intranets, slack, MS Teams, organisational newsletters, and team meetings. There are several cross-industry awareness raising initiatives which can serve as a springboard for highlighting this issue to staff members (see p.11: Appendix 3).

Suggested content for these touchpoints with regard to continuous learning are outlined in Section Two of this document (p.7).

3. Evaluation of continuous learning and regular review

GRFH landscape is rapidly changing with new research, support options and tools becoming more widely available. It is recommended that organisations put plans in place to continually improve staff knowledge about the subject, regularly review customer journeys and identify new staff that may interact with customers affected by GRFH. We have listed some best practices below:

- Where possible, building learning about GRFH into organisational Learning and Development strategy, and/or business plans.

- Ensure that all GRFH learning initiatives have feedback from staff at regular intervals, that can be responded to and learnt from.

- Share insights on what works with other teams and organisations.

- Regularly review training and development resources to ensure they contain most up-to-date content on GRFH.

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1 For Gambling businesses, evaluation of continuous learning efforts can contribute to Assurance Statements for the Gambling Commission.
Section Two
Advised content

As outlined in Section One, there are several touchpoints to continually learn about this issue as a staff team. To ensure safe experiences for customers, it is important that all staff working in relation to this issue have awareness and skills that are consistent. The themes explored in this section look at what content should be included in this ongoing task.
4. Equip staff with core information to mitigate gambling related financial harm

As a minimum, it is recommended that training and learning materials cover the following areas:

- **The nature of gambling and GRFH** – It is important that all members of staff understand gambling behaviour and the nature of gambling related harm. This is to ensure that all organisations policies, communications, and interactions with customers are designed to be sensitive to the subject.

- **Identifying gambling related harm** – Members of staff should have skills training in identifying gambling related harm in customers. The markers of harm will differ for each organisation (see: Referral Pathways document in the GRFH toolkit)

- **Taking action where harm is identified** – If staff can identify GRFH, they should be equipped to signpost, refer and/or support customers. The nature of action is highly dependent on a staff members role and nature of organisation. (see: Timely Interactions with Customers to Prevent GRFH resource in GRFH Toolkit)

5. Use key messages to underpin learning

Experience suggests that consistent messages will improve outcomes for customers. Three key messages have been identified as being a foundation for helpful, meaningful interactions with customers. It is suggested that the following key messages, developed in collaboration with ‘experts by experience’, are used as a basis for learning to take action on gambling related financial harm.

(To see this resource in full, please read: Core Messages resource in the GRFH Toolkit)

The three advised key messages are:

- Gambling is not a way to make money
- There is hope, and help is available if you need it
- Gambling can be harmful; not talking about it makes it worse
6. Use case studies and lived experience to enhance awareness and interaction

GRFH can be a sensitive issue, and for many staff it may be something that they have little knowledge or experience of addressing. Numerous organisations have underlined the importance of using case studies as integral to enhancing colleagues’ understanding of this issue. Please refer to the Core Messages and Self-Help Toolkit for examples. The following tips seek to maximise the effectiveness of case studies within continuous learning.

- **Case studies based on your real-life customers are desirable.** If an organisation is able to produce case studies from their own customers, looking at specific issues (e.g. debt, co-morbidity with other vulnerabilities), this will help to bring the topic to life and make it easy to identify with their own work.

- **Case studies should represent diverse experiences.** It is preferable to represent a variety of experiences including:
  - Levels of severity – using examples of people at low and moderate risk of GRFH
  - Type of harm experienced – try to use examples of different types of gambling, and different types of financial harm
  - Customer experience and outcomes – case studies that showcase different pathways to support and positive outcomes after interaction

- **Case studies should intersect with other vulnerabilities.** GRFH is rarely an issue in isolation for a customer. Using case studies that illustrate a range of different and or linked impacts (see p.5: Section One Point One) will give a realistic picture of harm.

Further information to support the development of case studies:

- GamCare Forum (personal testimonies and a huge diversity of experience, first-hand from those affected by problem gambling)
- Refer to real-life stories of those with lived experience of GRFH in Timely Interactions with Customers to Prevent GRFH resource in GRFH Toolkit
- Money Saving Expert Forums

7. Reinforce soft skills to support work

Interactions with customers affected by gambling related financial harm will often be sensitive in nature. It is important that staff develop soft skills to ensure that interactions are as helpful as possible, and that the wellbeing of your staff is taken into consideration. Key soft skills for staff helping affected customers should include:

- **Being non-judgemental.** GRFH can be stigmatising for customers who are impacted. Cultivating a non-judgemental outlook and communicating this to customers will likely lead to better outcomes.

- **Having empathy.** In some instances, customers may ignore important messages or support because they feel people do not fully understand the circumstances they are in. Using phrases and tone to convey empathy will help the customer.

- **Providing reassurance where possible.** Issues of finance and problem gambling can be extremely stressful for customers and their loved ones. Wherever possible, staff should provide reassurance about an outcome; this will be greatly valued.
**Appendix 1:**
Planning continuous learning in your organisation

<table>
<thead>
<tr>
<th>Staff team/Role</th>
<th>Interaction with GRFH</th>
<th>Information and skills required</th>
<th>Continuous learning opportunities</th>
</tr>
</thead>
<tbody>
<tr>
<td>e.g. Customer service agent</td>
<td>Frontline adviser, specialising in vulnerabilities</td>
<td>Awareness, identification and intervention skills</td>
<td>Mandatory training, additional e-learning module, internal comms</td>
</tr>
</tbody>
</table>

**Appendix 2:**
External training providers

There are several organisations that provide specialist training on gambling related harm. A summary is listed below of current known providers, as of August 2020. This list is not exhaustive and not intended to be a recommendation or endorsement of available services.

**Betknowmore:** Betknowmore is an award-winning provider of gambling support and training services. Please contact Stella Comber, Head of Learning and Development stella@betknowmoreuk.org or Frankie Graham, CEO frankie@betknowmoreuk.org.

**Citizens Advice:** Citizens Advice provide training of Reducing Gambling-Related Harm. Please contact 01443 409284 or Caitlin.tempest@carct.orh.uk for further information.

**EPIC Risk Management:** EPIC deliver training on gambling related harm to a variety of different audiences. Please contact 1942 494913 or info@epicriskmanagement.com to find out more.

**GamCare:** GamCare provide training on gambling related harm to the gambling industry, financial services sector and to a range of other audiences. Visit www.safergamblingstandard.org.uk/training-and-resources or contact us at industryservices@gamcare.org.uk.

**Money Advice Trust:** MAT provide training for staff working with gambling, alcohol, and substance misuse issues, to frontline, customer-facing staff, management, specialist teams, back office staff and relevant suppliers. Contact training@moneyadvicetrust.org or 020 7653 9734.
Appendix 3:  
Calendar of campaigns and events to help raise awareness about GRFH

- World Health Day - April
- Mental Health Awareness Week – May
- Men’s Health Week – June
- Suicide Prevention Day – September
- World Mental Health Day - October
- Talk Money Week – November
- Safer Gambling Week – November
- Alcohol Awareness Week – November