

Timely Interactions with Customers to Prevent Gambling Related Financial Harm

Guidance for financial services, debt advice agencies and gambling businesses on how to identify and help affected customers

September 2020

Overview

Historically, many organisations have not had conversations about gambling affordability with their customers. This is now starting to change, as awareness of gambling related financial harms increases.

Gambling businesses use a variety of techniques to establish whether customers are gambling with their own money (as protection against money laundering etc.), often asking customers to provide their bank statements or pay slips. More recently, the Gambling Commission has instructed gambling companies to run affordability checks on customers to ensure they are gambling within their means. The gambling industry is trialling different ways to identify and assess customer affordability: some operators are using postcode data to estimate household income, others are looking at open banking as a solution.

Back in 2018, challenger banks Monzo and Starling were the first to offer gambling blocks – a feature that allows customers to switch off gambling transactions in their banking app. Currently, eight financial services firms offer bank card gambling blocks to their customers.¹ These innovations presented an opportunity for the banking sector to start engaging their customers in a conversation about gambling, and to refer those experiencing harms to specialist gambling treatment and support.

Debt advice agencies are also reporting a rise in people disclosing gambling problems. Some Citizens Advice branches screen for gambling harm in their routine customer interactions. PayPlan, one of the UK's leading debt advice agencies, have also reported a 280% increase in the number of people who voluntarily disclosed a gambling addiction in the last three years.

In October 2019, GamCare brought together four sectors involved in a gambler's journey, including banks, debt advice organisations, gambling support services and the gambling industry. Our Gambling Related Financial Harm (GRFH) programme is a cross-sector initiative to galvanise organisations to work together to build knowledge and encourage consistent action to tackle GRFH.

Over the last year we have talked to many individuals with lived experience of GRFH and heard real-life stories about gambling problems going undetected for too long. Their collective view is that interventions need to happen earlier, and that banks particularly should play a critical role in helping to identify at-risk customers and stopping a gambling issue from escalating. Mark's story (**see page 4**) illustrates the costs and consequences of inaction.

Consumer opinions can be split when it comes to banks using transactional data to initiate intervention. Barclays qualitative research found that vulnerable customers can be initially more sceptical about banks using data to identify vulnerability (often driven by concerns about negative consequences and past negative experiences). However, once they were taken through the ways in which banks could help they saw the value in use of data for these purposes.² GamCare have been working with Barclays to help them set up a pilot programme to identify and reach out to customers at risk of GRFH. The objective of this intervention was to provide additional support, including facilitating warm transfers to the National Gambling Helpline. Insights from this pilot suggest that customers welcomed the fact that their bank got in touch about gambling and offered support. We are pleased to include details about this pilot (**see page 21**) and many other case studies and would like to thank these organisations for sharing them.

To enable more organisations to develop timely communications and effective interventions, we have developed this guidance document in collaboration with our Advisory Group and our Lived Experience Panel. Our intention is that this acts as a call to action for all organisations to adopt a more proactive approach and to start normalising conversations about gambling affordability and potential financial harms.

¹ <https://cpb-eu-w2.wpmucdn.com/blogs.bristol.ac.uk/dist/6/598/files/2020/07/A-Blueprint-for-Bank-Card-Gambling-Blockers-Report.pdf>

² <https://home.barclays/content/dam/home-barclays/documents/citizenship/our-reporting-and-policy-positions/Consumer-attitudes-to-identifying-vulnerability-through-the-use-of-data.pdf>

Five steps to proactive, timely and effective communications with your customers to mitigate gambling related financial harm:

1. Provide information about gambling advice and support
2. Identify customers affected or at-risk of gambling harms
3. Take action and offer help
4. Protect customer data
5. Evaluate, learn and improve



The following real life stories show what happens when problem gambling goes unnoticed. They demonstrate opportunities where banks, lenders and gambling businesses could intervene before gambling spirals out of control.

GamCare Forum user

"Last week, <my best friend> sent me a screenshot of his online banking to show that "at a click of a button" he was authorised for a £1600 overdraft. He has 3 bank accounts and the one he got his overdraft on is the worst. There are endless charges for going over, the statement is just a list of online gambling sites and the money going in is going straight to these sites. He spent the £1600 in about 30 minutes. He felt really low after. He keeps saying that he can't see no way out and that he can see no future. I went to his house on Monday and he was telling me how easy it was to get the money. He logged on to the same bank account and was authorised then and there for another £1800! I told him to call and get it revoked. Instead, in the time it took me to make a cup of tea he'd lost it all."

Mark's story

Mark, from Derbyshire, had a successful career in financial markets before his gambling behaviour began to take a toll. When he came to GamCare, he had lost around £1 million, and had served a prison sentence for fraud he had committed to fund his gambling.

His story illustrates that banks and gambling businesses have vital opportunities to intervene and help their customers prevent a gambling issue from escalating.

"I have always gambled, even as a child on the slot machines while on holiday in Skegness. Later in life, health issues, divorce and bereavement over a two-year period left me feeling lonely and I started to gamble as a way to cope. I was earning very good money so this was sustainable for a short time, but as I got into more and more debt through the escalation of losses, I started to commit fraud to fund my addiction. I went from being a very successful financial adviser to being a compulsive gambler."

All my betting was done online through one bank account, which I had set up specifically for this purpose away from my main account. I had some wins, but over a four-year period I managed to gamble away over a million."

I had one contact from a gambling site when I was asked to provide proof of my earnings. My £60k salary was enough evidence for them to allow me continue to gamble and I was made a 'VIP' customer."

During this whole period, I received no contact from my bank to question the amount I was gambling, where the funds were coming from or even just to show concern for my wellbeing."

Eventually, my conscience took over and I admitted my actions to my employer and handed myself in to the police. After losing my job I lost my home, I went bankrupt and was living in a car I did not own – I was suicidal. I ended up serving 20 months in prison."

Most gamblers who are experiencing harm will only stop when all hope is lost. Intervention is needed much earlier. If my problematic patterns had been noticed and reflected back to me much earlier, it could and would have made an enormous difference. If my bank had been in touch notifying me that they had noticed the high levels of gambling spend on my account, and that they were concerned about my wellbeing and offering routes to support, it may have given me that moment of clarity needed to make the change. The gambling business was also at fault – there was no way they should have allowed me to keep increasing the amounts I was gambling, but they let me carry on and made me feel important as I was a VIP customer."

I used to feel like there was no point talking to anyone as they wouldn't understand, but in times of crisis we all need someone. For me, that someone was the team at GamCare. They kept me going and now I'm looking forward to helping others to stop gambling if it's causing them harm."

Step 1 Provide information about gambling advice and support

If your organisation is serious about helping customers affected by gambling, the first step is to provide information about the help and support you can offer.

- Encourage your customers to use gambling management tools (e.g. time limits, deposit limits).
- Gambling support information and tools should be easy to find on your website and searchable. Examine your customer journey carefully and use every opportunity to signpost to gambling support pages from other relevant topic areas. The table on the next page (see Figure 1 on page 6) provides recommendations on the type of information these support pages should cover.
- Make sure this information sits across all your brands, products and communication channels (mobile app, website, posters, leaflets, videos etc.).
- The Gambling Commission states that gambling businesses in Great Britain must make responsible gambling information 'readily available'. As there is no agreed definition of what 'readily available' is and where it should be placed, gambling businesses should make every effort to ensure this information is easy to access and referenced in all communications. You may want to consider looking at existing research, best practice examples within your sector or engage user experience experts.
- Promote gambling support information to your customers during the year through blogs, social media channels as well as in your internal communications. Refer to Appendix 3 in GRFH: A Framework for Continuous Learning in Organisations for a calendar of events that provide opportunities to raise awareness about gambling harms across the year.



42%

of gamblers are not aware they can set financial limits on their gambling account

Gambling Commission (2020)

43%

of survey participants were not aware that bank gambling blocks exist

Personal Finance Research Centre/GambleAware (2020) ³

³ <https://cpb-eu-w2.wpmucdn.com/blogs.bristol.ac.uk/dist/6/598/files/2020/07/A-Blueprint-for-Bank-Card-Gambling-Blockers-Report.pdf>

Figure 1

The table below provides content recommendations for gambling support information pages. Use the [Core Messages and Self-Help Toolkit](#) for further information about different tools, support options and suggested copy.

Necessary information	Going above and beyond
Signs of problem gambling to look out for	Link to supplementary information pages such as step-by-step instructions (e.g. how to activate gambling blocks or how to use blocking software)
Specific ways your organisation can help (e.g. tools you have available or and additional support you can offer)	Include an anonymous real-life experience example and explain how you have helped customers in similar situations
Provide signposting information to gambling treatment and support services	List different ways they can access support from you (e.g. telephone, in branch, webchat)
Equip your customers with a self-help toolkit by letting them know about bank gambling blocks, self-exclusion schemes and blocking software	Signpost to external support organisations and tools (e.g. free debt advice, budgeting tools)
Provide information to customers who are affected by someone else's gambling (e.g. help and support available to them, how they can help the gambler)	
Invite customers to disclose gambling problems, explain what happens and the steps you will take to help them. Reassure them with what information you can keep confidential.	



How a debt advice agency helps clients affected by gambling

PayPlan is one of the UK's leading free debt help providers. Their approach is that if a client discloses a gambling problem they need to be treated as vulnerable, and offered additional support. The PayPlan website has a dedicated information page highlighting how they help their clients affected by gambling or alcohol and drug addiction. The website provides information about what extra support an individual can receive when they disclose a gambling problem to a PayPlan adviser.

PayPlan have seen a 280% increase in the number of people who voluntarily disclosed a gambling problem in the last three years.

"Clients appear to be growing in the confidence required to disclose a gambling addiction. We believe this is due to more campaign awareness around responsible gambling, combined with us growing our own knowledge and experience in spotting the signs of addictions and then providing ongoing support for our clients."

Emma Gibbons, Vulnerable Client Manager at PayPlan

How do we help gambling addicts with debt?

Tell us once, and we will be able to help. It takes a lot of courage to speak up about an addiction and we have a dedicated [Vulnerable Client Team](#) who specialise in talking to clients about their money worries. We recognise that an addict might need extra support, so our team offers non-judgemental and confidential advice to anyone who tells us about their circumstances. Advisers offer extra help including information about:

- Self-exclusion options for gamblers
- Specialist support & advice services

Advisers can also work closely with creditors (companies you borrow money from) to explain the situation and ask them to offer extra support like [breathing space](#) so you can take a break from worrying about debt and focus on your own wellbeing. We will then offer support and a [debt solution](#) to help you get back on track with repaying your debts.

On the link between debt and gambling, GamCare said:

"Each year, around two thirds of the people we speak to on the National Gambling HelpLine disclose some form of debt and related financial difficulties because of their own gambling, or because of a loved one's gambling. We frequently signpost clients to debt advice as part of supporting them."

PayPlan will always be happy to discuss any gambling problems in confidence.

(screenshot from PayPlan website July 2020)

Case Study – Sky Betting and Gaming



Gambling operator Sky Betting and Gaming have been running tests to start talking to customers about affordability when their net deposit amounts hit a certain threshold.

"The emails focus on encouraging customers to set deposit limits and we've been evolving them based on our customer research into language and tone. Our findings suggested that more reflective language in our communications would lead to a higher likelihood of them being read and should also lead to customers feeling more informed and cared for."

Whilst these tests are targeting specific groups of customers initially, we also want to explore how we can introduce the concept of affordability even earlier in the customer journey, as we feel this will help normalise the topic in the gambling space. However, initial analysis suggested engagement rates were higher when the net deposit threshold was higher, so further consideration will be needed to determine the right message to deliver at the right time."

Stacy Harper, Safer Gambling Manager
at Sky Betting and Gaming

sky bingo

CAN YOU AFFORD WHAT
YOU'RE GAMBLING WITH?

Hi

We're all able to budget for the things we want and need, from holidays and phones to broadband and energy deals.

And if you like to gamble, setting aside an amount you can afford to play with is just as important.

HOW MUCH CAN YOU AFFORD?

If you do one thing today, why don't you take a few moments to work out how much you're happy to spend with us from your disposable income? You can use a [budget calculator](#), like the one the Money Advice Centre provides, to help you.



That way, you can be super sure you're not spending more than you can afford.

47%

of customers said they would be very uncomfortable if a gambling operator asked them about their occupation and income status

(The survey was carried out with Sky Betting and Gaming research panel, an engaged customer cohort.)

Step 2 Identify at-risk and affected customers

Your organisation may hold customer data that can help identify those that might be at risk or have already been affected by gambling harms.

- Financial services firms (such as banks, building societies, lenders and e-wallet providers) are particularly well placed to detect financial detriment through transactional data or credit applications. Providers should use this data to identify vulnerable customers and offer tools and information, and signpost to support organisations.
- There are a wide range of indicators associated with problem gambling and we have listed some of the warning signs for different sectors that should prompt intervention (**see Figure 2 on page 10**). We would encourage organisations to expand this list based on the knowledge they have about their customers and the data they hold.
- Gambling businesses should refer to the Gambling Commission's formal guidance on identifying and interacting with customers to minimise harm.⁴ We included a small sample of these 'markers of harm' used by gambling businesses (**see Figure 2 on page 10**).
- Gambling related harm does not happen in isolation from the rest of the gambler's life. It's important to be aware not only of existing gambling behaviour, but any pre-existing vulnerabilities or life events that can make a customer more at-risk of gambling harms. Refer to the list provided by gambling support organisation Betknowmore (**see Figure 4 on page 12**), which they use to build a holistic profile of their customers and develop tailored support plans.
- Research by Barclays bank suggests that the public would feel more comfortable with banks contacting customers to discuss risky behaviour such as gambling when there is also clear financial detriment.⁵ Refer to the six indicators of financial difficulty from debt charity StepChange (**see Figure 3 on page 11**).
- Banks and building societies should use Money and Mental Health Policy Institute's best practice recommendations if considering to analyse customer financial data to identify potential problems.⁶



⁴ <https://www.gamblingcommission.gov.uk/PDF/Customer-Interaction-Formal-Guidance-Remote-July-2019.pdf>

<https://www.gamblingcommission.gov.uk/PDF/Customer-Interaction-Formal-Guidance-Non-Remote-July-2019.pdf>

⁵ <https://home.barclays/content/dam/home-barclays/documents/citizenship/our-reporting-and-policy-positions/Consumer-attitudes-to-identifying-vulnerability-through-the-use-of-data.pdf>

⁶ <https://www.moneyandmentalhealth.org/wp-content/uploads/2019/10/Data-Protecting-report.pdf>

Figure 2

Sample list of indicators and behaviours that could trigger an intervention

Financial services sector	
If combined with high value and high frequency gambling transactions	Missed repayments (loans, mortgages)
	Previous use of gambling block/Request to enable gambling transactions again
	Unusually frequent and/or declined credit applications
	Late night gambling transactions
	Additional accounts/e-wallets and transfers between them
	Customer shows signs of financial difficulty
If combined with one or multiple gambling transaction(s)	Use of high cost credit (e.g overdraft, payday loans)
	Large sum deposited into bank account (redundancy payment, loan)
	Customer attempts to gamble, but transaction declined due to an active gambling block

Debt advice sector	Gambling businesses
High value/high frequency transactions on bank statements	Chasing losses
Unexplained budget surplus	Late night gambling
Missed repayments	Gambling on higher risk products
Unexplained frequent cash withdrawals (especially if they happen within a small timeframe or after salary/benefits being paid into account)	Large losses
Additional accounts/pre-paid cards/e-wallets and transfers between them	Changing deposit limits
Money owed to family and friends	Failed deposits
	Frequent or repeated use of the time out facility
	Multiple gambling accounts

Figure 3

The six indicators of financial difficulty

1	Making minimum repayments on credit commitments for three months or more
2	Falling behind on essential bills
3	Using credit to pay essential bills
4	Using credit to keep up with credit commitments
5	Using credit to get through to payday
6	Getting hit with overdraft or late payment charges on a regular basis

Life on the Edge (2013) and The New Normal (2015) – both by StepChange debt charity ⁷

StepChange debt charity define people reporting three or more of these indicators as being in severe financial difficulty. Those reporting one or two are considered to be in moderate financial difficulty.

4 in 10

Money and Mental Health Research
Community members would like their
bank to take immediate action
(e.g. blocking payments) if they
spend an unusual amount of
money on gambling

Only **7%** thought
that a bank just telling them about
the issue would be sufficient

Money and Mental Health
Policy Institute (2019)

⁷ <https://www.stepchange.org/policy-and-research/life-on-the-edge.aspx>

Figure 4

Risk factors that make a person more vulnerable to gambling harms. Referring to these key drivers may help you to better identify customers that could be more at-risk of gambling harms.

Source: Betknowmore UK

Pre-existing or new complex vulnerabilities:	Gambling behaviour vulnerabilities:	Past and current life events:
Mental health condition	Physical & verbal signs of distress/anxiety	Lack of self-care
Cognitive impairment	Mood swings/elation/despair	Substance or alcohol dependency
Learning capabilities	Regularly gambling until all money is lost	Age
Dementia	Multiple EGMs ⁸ /rapid gameplay	Homelessness
Parkinsons	Gambling without a break	Exploitation
Anxiety or depression	Returning to gamble after losing money	Language barrier
Post-traumatic stress	Trying to borrow or loan money	Criminal behaviour
Abuse or trauma	Superstitious rituals	Loneliness/isolation
Bereavement	Blames EGM or staff for losing	Unemployment
Support or health services helping customer	Gambles in red zone	Stigma/shame expressed



⁸ EGM - Electronic Gaming Machine

The following case study describes a partnership between GamCare and NatWest to deliver gambling treatment in bank branches.

Case Study – NatWest



GamCare is working with NatWest to offer gambling treatment service in consulting rooms within NatWest branches.

In October 2019, NatWest partnered with GamCare to launch a new scheme aimed at supporting people who are impacted by problem gambling. NatWest recognised that the number of people impacted by gambling was increasing and wanted to ensure that support was easily accessible for those that needed it the most. Through the partnership, NatWest offered GamCare and their delivery partners private meeting space in branches for face-to-face treatment sessions.

By introducing services in the high street, GamCare was able to increase accessibility and choice for clients who are seeking support, reducing traditional barriers to access. The service is open to both customers and non-customers and was initially launched in 17 branches throughout London and the South East. The intention is to expand the programme once social distancing measures in branches have been lifted.

In addition to the in-branch programme, GamCare has provided training to a number of NatWest specialist teams to ensure that frontline staff are able to identify any customer affected by gambling problems – their own or someone else's – compassionately and effectively, and ensure that they are swiftly referred to a specialist team who can provide the appropriate support.

"Although the initial feeling of delivering a service in a high street bank is a little odd, it seems to work well with clients. It gives them a cover of normality and anonymity. Also, being at the NatWest branch, most people know where it is so there is no confusion of where the session will take place. It also gives us the opportunity to reach out to clients who live further away."

"Being in the bank has also helped me to in turn assist my clients better as I now better understand gambling from a bank's perspective. Some of my clients say they are afraid to admit their gambling addiction to the bank in case there are consequences (i.e. refusal for a loan or mortgage). Bank staff have told me that an admittance of gambling would not be the sole reason for a refusal for an application. In the end, banks already have all our transactional data – whether we disclose the problem to them or not."

Eamonn, Gambling Treatment Practitioner

"The environment at NatWest is easily accessible and a familiar, confidential setting for clients, helping them to feel more comfortable during a difficult time. I had clients that were able to work their appointments with me around their jobs, because of the location."

"Most of the clients I saw there were in financial difficulties and many have entered into the sessions in a very dark place but left with hope and the confidence to continue their lives without gambling. If they banked with NatWest, I was able to support them in making the decision to talk to one of the bank staff after the session. Hopefully in the near future we can get direct referrals from the bank and help NatWest customers, whose financial difficulties are related to gambling problems."

Sally, Gambling Treatment Practitioner

The partnership between NatWest and GamCare, as described on the previous page, had a positive impact on John, who previously wasn't able to access gambling treatment face-to-face.

John's story

Gambling treatment practitioner Eamonn tells us about John, who accessed gambling treatment sessions in a NatWest branch.

(Name and some personal details have been changed for anonymity)

"I worked with John, who had previously worked with us as a phone client because he was unable to get to one of our counselling offices. When we started offering sessions in NatWest, it gave him the chance to get help face-to-face.

John suffered with mental health issues, in particular schizophrenia and at times the voices in his head would talk to him and encourage him to gamble. The gambling in turn would compound his mental wellbeing and so in effect we had two cycles to contend with. One day John missed his session – it turned out he had arrived early and went into an arcade. Our next session gave us the opportunity to look further at his triggers and the dynamics of his relapse and it also gave John the chance to reassess his relationship with his gambling and take necessary action such as excluding himself from gambling places and talking openly to his father, who helped John take control of his finances.

After a few weeks, John was feeling more empowered and his mental health was better (we had spoken about a possible medication review with his GP). Opening up to his father had brought them closer together and he had another outlet for himself. With a reduction in his preoccupation with gambling he was taking up new activities and spending quality time with his daughters, who he would see on pre-planned weekends with his ex-partner.

When we finished his sessions, John was feeling strong in character and was buoyed by the feeling that he now had a comprehensive understanding of not just his triggers, but how to successfully deal with a non-gambling lifestyle. At my last point of contact with John for his three-month catch-up, life was still bright and optimistic."



Step 3 Take action and offer help

Many people can be unaware their gambling is causing harm, and simply highlighting their current gambling behaviour can be a powerful motivator for change. Outlined here are some key principles to follow when targeting your communications to specific cohorts affected by gambling harms.

- When you are concerned that a customer may be at risk or affected by gambling, acting early and quickly could help stop harm from occurring or prevent the harm worsening.
- Decide the best way to interact with your customers about their gambling based on the harm the customer is experiencing and using their communication preferences.
- When deciding on the intervention required, be clear about the expected outcome. For customers experiencing low to medium levels of harm, automated messages signposting to information and tools may be enough. Customers experiencing medium to high levels of harm may need more support and require human intervention (for example, where a customer is applying for credit but their transactional or account data suggests a gambling problem). The table on the next page (see **Figure 5 on page 16**) has some tips for telephone and mailing communications with your customers affected by gambling.
- Telephone and face-to-face interventions should always come from an experienced colleague trained to help vulnerable customers. For details about training, refer to our **GRFH: A Framework for Continuous Learning in Organisations** ([link](#)) resource. Use the **Referral Pathways** ([link](#)) flowchart for your sector to guide your interactions with customers affected by gambling.
- Always signpost customers to the National Gambling Helpline and where possible, facilitate warm transfer. Hot-key transfer offers a seamless pathway to support and increases the likelihood of the customer getting help. More information about setting up warm transfers can be found [here](#).
- GamCare provide gambling support leaflets which can be downloaded [here](#). You can also order printed leaflets if you are helping customers face-to-face or would like to include them in your mailed communications.



¹⁰ https://www.moneyandmentalhealth.org/wp-content/uploads/2020/07/A_Safer_Bet.pdf

Figure 5

Tips for telephone, face-to-face and written communications with customers

Telephone and face-to-face conversation	Written communications
<ul style="list-style-type: none">• Always seek permission before giving advice• Ask open questions• Don't be judgemental or make assumptions about why they're gambling• Listen carefully and if you have any safeguarding concerns, act immediately following your organisational procedures	<ul style="list-style-type: none">• Make sure advice is personalised and tailored for that customer's circumstances• Explain the reasons that triggered this communication from you• Let them know this is not a standard message for all customers, it will help draw customer's attention and encourage action

In Barclays quantitative research¹¹, participants looked at a scenario where a customer had recently begun spending increased amounts of money on online gambling, including poker. The customer was not showing any signs of financial difficulty at that moment. Here is how the respondents thought the bank should act:

16

72%

were in favour of the bank taking some sort of action

(e.g. offer direct support, refer to external organisations or send general information)

20%

favoured the bank doing nothing

¹¹ <https://home.barclays/content/dam/home-barclays/documents/citizenship/our-reporting-and-policy-positions/Consumer-attitudes-to-identifying-vulnerability-through-the-use-of-data.pdf>

The following case studies are good practice examples of banks and lenders intervening where potential gambling related financial harm has been identified.

Case Study – UK retail bank

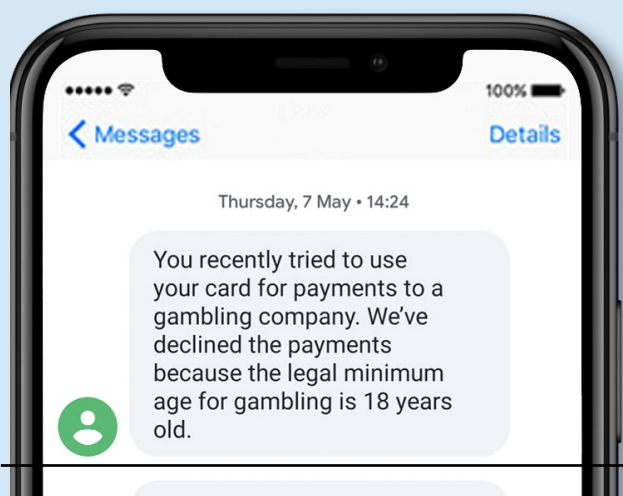
One of the major UK retail banks is preparing to trial a mailing intervention

One firm is looking to proactively engage with customers through a mailing initiative. Customers who have been identified (through transactional analysis) as being at greater potential risk of experiencing financial harm due to their gambling spend will be sent a letter. The aim is to offer support, highlighting a number of tools that could be used by the customer to keep on top of their spending habits. The letter will also include reference to external support and national helplines that may further help and support them.

Case Study – Santander



The bank sends text messages to under-18s attempting to gamble



Whilst preventing underage gambling is the responsibility of licensed firms, gambling transactions attempted by under-age customers are automatically declined by Santander. When an under-18 year old customer attempts to make a payment to a recognised gambling merchant (identified by the merchant category code), Santander decline the transaction and send the account holder the following text message to explain why their transaction has been refused:

"You recently tried to use your card for payments to a gambling company. We've declined the payments because the legal minimum age for gambling is 18 years old."



Case Study – London Mutual

This case study provides an example of how a credit union prevents problem gamblers from getting into debt and signposts rejected applicants to gambling support.

London Mutual is a credit union serving Southwark, Lambeth, Westminster, Camden and all HM Forces. London Mutual offers access to affordable credit and their underwriters look out for problematic gambling on bank statements when assessing loan applications. Between 1 Jan 2020 and 31 July 2020, London Mutual rejected £380,000 worth of loan applications and potentially prevented almost 100 members from getting into problem debt.

“Depending on the income we allow around £50 per month for gambling. Where problem gambling has been identified, we send an email to those explaining the reason their credit application has been declined and signpost them to external support organisations. Some customers would contact us over the phone and say that they are aware of the issues and going to take some action, others say this is not our business.”

Lakshman Chandrasekera, CEO, London Mutual

Below is a sample letter London Mutual would send to members when underwriters identify that their excessive gambling would affect their ability to meet credit repayments:

We regret that your loan application has been unsuccessful. We carefully consider all applications, and work for a positive outcome wherever we can. This includes looking at your bank statements, pay slips and other documents provided. Our team take into account both affordability, as well as any circumstances which might affect your ability to repay.

In this case, your bank statements show frequent payments to online gambling providers. These payments make up a significant proportion of your income and monthly expenditure, and we have concerns that your current level of gambling puts you at risk of harm. Your financial wellbeing is our top priority, and it would be irresponsible for us to approve your loan in such circumstances.

The letter also provides signposting information to encourage customers to seek help with their gambling.

Step 4 Protect customer data

- Proactive communications with customers may involve obtaining, storing and sharing personal data. Ensure that you continue to comply with the relevant requirements of the General Data Protection Regulation (the GDPR) and Data Protection Act 2018 (the DPA 2018).
- Identifying customers affected by gambling harms in order to provide support can be done in two ways: through self-disclosure (where a customer has already discussed their problem), or through the use of account and/or transactional data (e.g. when a bank looks at customer's transactional and account data to identify those that would benefit from additional support).
- Your teams helping customers affected by gambling harms should work closely with GDPR experts to ensure that any communications or interventions with customers comply with the relevant GDPR requirements. Establish a legitimate basis for your intervention before commencing any activity.
- The Money Advice Trust are due to publish recommendations for financial services firms about recording vulnerable customer data following disclosures.
- Debt advice agencies should refer to the Money Advice Trust guide "Recording client vulnerability for debt advisers"¹² when helping clients affected by gambling.



¹² <http://www.moneyadvicetrust.org/researchpolicy/research/Documents/Vulnerability%20-%20the%20experience%20of%20debt%20advisers%20Nov%202018.pdf>

Step 5 Evaluate, learn and improve

- Test different messaging with customers to find out what works with your customer base.
- Test different ways to understand which communication channels your customers respond to.
- Record actions taken by customers – this will help you evaluate the effectiveness of your interventions and communications.
- Continuously analyse data and use this insight and learning to inform more effective communications and interventions.
- Share any learning with other organisations that would benefit from your insight (even if this highlights what hasn't worked for you).



This case study describes how Barclays bank piloted an initiative to identify customers that may have been affected by gambling harms and proactively contacted them to offer support. Two types of messages were tested as part of this trial.



Case Study – Barclays

An initiative to identify and contact customers showing signs of financial vulnerability relating to their gambling.

Gambling and financial difficulty can often go hand in hand and Barclays acknowledged that customers can find it hard to ask for help. To address this, the bank designed a test and learn pilot to identify customers who were potentially financially vulnerable through problem gambling to offer them help and support.

Identification

At the start of 2020, Barclays identified a cohort of customers they believed they could help through this pilot by combining data on a number of variables, such as:

- Customers who had used the gambling merchant control feature (turning on/off)
- Different gambling behaviours including volume, size and regularity of gambling transactions
- Potential signs of financial vulnerability such as overdraft usage and return payments

At no point did Barclays try to identify or diagnose addiction or any associated mental health illnesses related to gambling.

Contact

Barclays proactively contacted customers by sending an SMS asking them if they wanted to speak to the bank about their use of the merchant category control function (the gambling block). They tested two types of SMS: one referring to gambling and one not.

If a customer replied 'yes' to the SMS, Barclays proactive team arranged a time to speak to them. If a customer replied 'no', no further contact was made.

Support

GamCare provided training to Barclays staff to equip them with the necessary skills to address the needs of those adversely affected by problem gambling.

When Barclays contacted the customers who consented to the call, they talked them through how to track their gambling spend through Barclays spend feature and provided guidance on money management.

Customers were also offered a warm transfer into the National Gambling Helpline where they would be able to access free confidential advice, information, treatment and emotional support from one of GamCare's trained advisers.

Outcomes and feedback

- There was no statistical difference in the response rate between the two types of SMS messages. Over six weeks, Barclays spoke to 86 customers, conducted 6 warm transfers into the National Gambling Helpline and 5 transfers into Barclays Financial Assistance Team.
- Customers welcomed the proactive contact and were open to discussing their gambling habits.
- Many customers had already taken other steps to control their gambling and told Barclays they wanted more friction to make it harder to turn gambling transactions back on.
- Customers appreciated the warm transfer to the National Gambling Helpline.
- Throughout the Test & Learn pilot, Barclays did not receive any complaints from customers relating to this intervention.

"I'm shocked and horrified to see how much I've spent in black and white." Barclays customer

"Thank you so much for the phone call and stepping in – you've changed my life." Barclays customer

"I'm feeling really positive about the future and for the first time in a long time I feel like the shackles have been released." Barclays customer

It is good practice to facilitate warm transfers into the National Gambling Helpline. Kate's story shows the positive impact such a referral can have.

Kate's story

Barclays identified Kate as being at risk of gambling harm as part of the bank's Test & Learn trial (see page 21) and utilised GamCare's warm transfer service. This enables customer service teams to transfer customers, wishing to receive specialist support for a gambling problem, directly into the National Gambling Helpline via a dedicated line.

(Name and some personal details have been changed for anonymity)

Kate was unable to work and a disability benefit was her only source of income. She said gambling started off as a few "fun" games on a bingo site, which then escalated to her spending all her money on online slots. She spoke about going without food or essentials for her house, with all the benefit money going on gambling.

Kate was ashamed of her gambling habit and did not open up to anyone about the problem. Despite having a very close relationship with her sister, she hadn't discussed gambling with anyone until Barclays called her.

"It went from £10-20 a week to all my benefit in a matter of hours. I might as well just throw it down the drain. There is stuff that I need at home that I don't buy. I feel guilty, but the guilt hasn't been enough to make me stop."

Kate previously used bank's gambling block via the online app. The GamCare adviser explained there are also other tools, such as the online self-exclusion scheme GamStop and GamBan, which blocks gambling websites and apps on devices. Kate was signposted to the GamCare website and forum for further support and accepted a facilitated referral for treatment.

With help from the adviser, for the first time she was able to recognise deeper rooted issues that contributed to her gambling. Towards the end of the call, Kate said that admitting the problem to the bank and the National Gambling Helpline adviser had made it real and had reduced the chance of her gambling.

"The minute the money hits my account, I have this overwhelming urge to spend it on gambling. I have got debt, but right now it's not insurmountable - but it will be if I carry on. I have to deal with it now."



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