

Bank Gambling Blocks

Gambling Related Financial Harm Workshop #7 Summary of key insights and recommendations for banks to consider

GamCare's Gambling Related Financial Harm (GRFH) programme is a cross-sector initiative to share knowledge, develop resources, and enable organisations to help customers affected by financial harms as early as possible. GRFH Insight Workshops bring relevant sectors (financial services, debt advice, gambling businesses and gambling support services) together to share knowledge and raise awareness about key and emerging issues relating to gambling and finances. You can read more about GamCare's GRFH work <u>here</u>.

The most recent event in our series of Workshops (held on 29 March 2023) explored how bank gambling blocks can be improved to better support vulnerable clients experiencing gambling harms, and the opportunities for banks to go beyond the blocking tool to support those affected.

Bank gambling blocks are free tools that help consumers control their gambling through their current account. They work by blocking transactions that are categorised as gambling – whether you're gambling online or at a physical venue – offering an additional layer of friction to customers who are at risk of acting compulsively. All main UK banks now offer gambling blocks, and GamCare recently published a comprehensive consumer guide to bank gambling blocks.

This Insight Workshop was a virtual event, bringing together 67 professionals from across different sectors: researchers, the financial and gambling industries, gambling support, debt and money advice sectors, as well as those who have experienced GRFH first-hand. The panel of expert speakers included representatives from the Financial Ombudsman Service, Behavioural Insights Team, TSB Bank, Betting and Gaming Council as well as a lived experience speaker.

This was the second event on bank gambling blocks - we held our first Gambling Related Financial Harm Insight Workshop in 2021 to better understand how consumers might be able to circumvent these blocks. You can download the summary from this past event <u>here</u>.

The recent session highlighted barriers that consumers still face in accessing and using gambling management tools from their bank and opportunities for banks to better support affected customers. We heard from TSB Bank about their gambling block development and design process, while the Behavioural Insights Team shared their ideas for improvements to these tools. Representatives from the Financial Ombudsman Service emphasised <u>the new</u> <u>obligations on financial services firms</u> to continuously test, monitor and analyse products and services that are offered to consumers – including gambling management tools – to ensure that they fulfil consumer needs. We also heard from the Betting and Gaming Council about the steps they have taken, in collaboration with Monzo, to address one of the loopholes in bank gambling blocks.

This document summarises key recommendations arising from our event, and covers the entire user journey: from awareness to gambling block activation, de-activation and ensuring that customers receive additional support.

At GamCare, we believe in cross-sector collaboration to address gambling related financial harm. If you work in financial services, we can provide resources, guidance, and help you implement gambling-related initiatives. Please get in touch: raminta.diliso@gamcare.org.uk.

Presentations from the panellists, including the Q&A, have been recorded and are available to watch on demand.

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"The gambling block offered by my bank has been a key pillar in my recovery, but more publicity is needed to raise awareness of bank gambling blocks, especially amongst those struggling with their gambling. Having this block in place, coupled with self-exclusion from online gambling, gives me a breathing space and a sense of security, especially when big sporting events are on."

JONATHAN, EXPERT BY EXPERIENCE

😟 1. Awareness of gambling management tools

The Challenge

Most banks in the UK now offer gambling blocks, but <u>research shows</u> that consumer awareness of these tools remains low. Bank gambling blocks can be difficult to locate within the banking app and firms do not tend to proactively promote these tools to customers who would benefit from them. Many people who have been affected by gambling harms tell us that whilst gambling blocks are a key component of their recovery toolkit now, they learnt about the blocks only *after* their gambling escalated.

Potential Solutions

- The financial services industry should collectively raise awareness about gambling blocks amongst UK consumers via media campaigns.
- Each bank should use every opportunity in the customer journey to educate consumers about gambling support tools (e.g. routine communications, account onboarding, when supporting customers who are in financial difficulties or have disclosed gambling).
- Customers should be able to find gambling management tools easily across all platforms (e.g. online banking as well as the mobile banking app).
- Gambling support information should be easy to locate and search for, and explain how the gambling block works.
- Banks should proactively offer gambling blocks to customers who are vulnerable and at-risk of gambling harm and financial difficulties (e.g. they
 have been refused credit because of high volumes of gambling or have disclosed gambling harm).
- Frontline staff should be trained to discuss gambling management tools and provide information to customers about the gambling block, and ideally (with the customer's consent) activate the block for them.
- Financial services firms should work towards a standard naming convention for gambling blocks to help drive the normalisation and adoption
 of these tools. Banks should also standardise where these tools are located and ensure that gambling blocks are placed in intuitive locations.

2. Turning the gambling block on

The Challenge

While most banks in the UK now offer gambling blocks, some are more accessible for consumers than others, and misconceptions still exist among consumers around how these tools work and the implications of using them. It is therefore important for gambling blocks to be as user-friendly, intuitive and easy to access as possible. In turn, gambling blocks do not currently offer the level of personalisation needed to suit the diverse needs of customers.

Potential Solutions

- Banks should reassure customers that the use of gambling blocks will not appear on their credit file or affect future credit applications.
- Banks should provide customers with clear information about how the gambling blocks work and their limitations (e.g. informing the customers that certain gambling transactions may not be blocked, without exposing loopholes and ways to circumvent the block).
- Banks could explore how these blocks can be personalised, e.g. the ability to customise the days or times when the block is active, or adding a personalised message that would appear when the customer decides to turn off the block, an option to track goals or even save the money that is no longer being spent on gambling.
- Banks should be inquisitive and ask customers why they're activating the block. Understanding why somebody wants to use the gambling block
 could create an opportunity for the customer to disclose vulnerability and allow the bank to tailor support accordingly.
- When a customer turns the block on, banks should prompt further action and tell customers about other tools and support options available (e.g. the TalkBanStop partnership). This could be done, for example, through a pop-up message or in a follow-up email.

3. Turning the gambling block off

The Challenge

Most banks allow customers to self-deactivate the gambling block within the mobile banking app. To prevent customers from acting compulsively, there is usually a waiting period of 48 or 72 hours ("cooling-off period") before they can gamble again. Some banks have also introduced positive friction, which requires the customer to speak with the bank's customer support team to discuss their reasons for turning the block off.

Potential Solutions

- Bank blocks should only be disabled by the customer, and banks should never time out or expire the tool automatically after a certain period.
- Banks should ensure that an active block is carried over to a new card issued by the bank (e.g. when the card with an active gambling block expires
 or is lost or stolen).
- To meet diverse customer needs, banks should offer a range of cooling-off periods or allow customers to set their own cooling-off time limits. Banks should also consider introducing an option to set up a permanent block to support the most vulnerable.
- Banks should consider adding more positive friction (particularly for customers with existing vulnerability markers on their account) before the
 gambling block can be disabled (e.g. requiring customers to call or chat to customer support before the block is disabled). This would give the
 customer some time to reconsider their decision.
- Customers toggling the block on and off could indicate compulsive behaviour and should trigger an intervention from the bank (see Section 5 Additional gambling support for vulnerable customers).



4. Addressing gambling block loopholes

The Challenge

Due to the rise of non-card based transactions offered by gambling operators, e.g. e-wallets or open banking initiated faster payments, there are now more ways to make transactions which do not carry the merchant category code. This has resulted in loopholes which allow customers to continue gambling despite an active gambling block being in place.

Potential Solutions

- Gambling blocks should be active when a card is within an e-wallet and/or mobile wallet.
- Banks should enhance their gambling blocks by ensuring that faster payments to gambling operators are covered by an active gambling block. The Betting and Gaming Council can provide access to a secure registry containing gambling operator bank account information.
- The banking sector should explore ways they can prevent gambling transactions to unlicenced and overseas gambling operators, as these transactions often bypass gambling blocks.
- Banks should have a simple mechanism for customers to report when the gambling block does not work. There should also be a system for banks to report these merchants to payment providers, card schemes (e.g. VISA or Mastercard) and the Gambling Commission.

5. Additional gambling support for vulnerable customers

The Challenge

Bank gambling blocks represent just one tool in a package of measures that can support customers. Some banks have started looking beyond the block and introduced additional tools, e.g. gambling limit setting. The use of a bank block is an important and timely moment to reach out and offer support to customers, including developing proactive approaches to communicate to customers at risk of gambling harm. Options that are not gambling specific but could help customers manage their gambling (e.g. ATM withdrawal limits or gambling spend limits) could be more widely considered.

Potential Solutions

- In addition to gambling blocks, banks should allow customers to set gambling spend limits.
- Training (or refresher training) should be provided for frontline staff to ensure they have all the necessary information to support customers who want to switch on gambling management tools and/or need further gambling support.
- Gambling block activation should trigger communications from the bank outlining other gambling support options.
- Banks could set up warm transfers into the National Gambling Helpline and facilitate warm referrals into specialist gambling support.
- Banks should consider whether a gambling block should be automatically applied when the account is overdrawn, particularly if the customer has vulnerability markers on their account.
- When discussing the gambling block with a customer, bank staff should try to understand the customer's situation and how they are gambling, and
 explore whether other types of transactions could be blocked to prevent further harm. For example, if transactional data shows that the customer
 is gambling using e-wallets, the bank could suggest blocking e-wallet payments.
- Banks should allow customers to exclude themselves from lending products and the marketing of these products so they can't access credit impulsively.
- Bank statements and money management tools within mobile banking apps should separate gambling transactions from other categories (e.g. entertainment) so that customers have a clear picture of their total gambling spend.
- Banks should offer customers an option to limit ATM withdrawals, which could support customers gambling at physical venues using cash.
- Banks should consider how to broaden their card block proposition and allow customers to stop transactions that, while not classified as gambling, cause similar harms (e.g. transactions to high-risk trading platforms and cryptocurrency exchanges, gaming).

