

Expanded Answers to Committee Questions

House of Lords Select Committee on the Social and Economic Impact of the Gambling Industry (25th February 2020)

Liz and Charles Ritchie, and Jo Holloway gave evidence to the HoL Select Committee on Tues 25th February, 2020. The Committee asked for some additional evidence. This has been supplied in a number of notes.

This note briefly expands on 2 of the questions which members of the Select Committee asked during the formal evidence session held on 25th February 2020. We ask that the Committee considers this extra information alongside the answers recorded in the transcript. Unfortunately the evidence session was not able to run for the allotted time and on reflection we felt that our answers to these 2 questions were rather hurried and lacked clarity.

Q175 The Lord Bishop of St Albans: Where are the gaps in the research that we need to fill?

Additional Response:

I would like to summarise the key areas of research which need to be addressed. This does not represent a complete picture of research which is required, rather they are some of the key areas that we have identified as directly arising from our work and investigations.

1. **Suicide and Gambling** – it is clear that there is a long established link between gambling and suicide (and we have provided an additional note on this). However, to the immense frustration of GwL families, there is still no robust assessment of the number of gambling related suicides each year in the UK.

We believe that one of the greatest contributions that GwL has made to the debate and campaign for better regulation of gambling is that we were the first people to highlight the undeniable link and provide an estimate of the scale of gambling related suicides in the UK (250-650 deaths per year). We also provided proof that these deaths involved “bright, happy, ordinary young people from happy families with great futures ahead of them”. The young people dying did not have a range of mental health or social issues; the deaths did not all involve high levels of debt; all the young people had started gambling as children. The clear message is that gambling can kill anyone.

In our earliest meetings with those responsible for gambling regulation, research and treatment providers the link between gambling and suicide seemed to be a revelation and certainly none had any appreciation of the number of deaths. One of our earliest demands of the Gambling Commission and GambleAware was that they should commission a significant quantitative study of gambling and suicide, probably along the lines of the “psychological autopsy” study which formed the basis of the Hong Kong study referenced in our paper.

Some 2 years later, the only study on gambling and suicide which has been commissioned was a small scale exercise involving analysis of the 2007 Adult Psychiatric Morbidity Study. While the study confirmed the higher suicidal ideation and attempts associated with “problem gambling” and identified gambling as a factor in suicidal ideation and attempts even after all other factors were accounted for, this is a totally inadequate response to our demands and the need for us all to know the scale of deaths.

The lack of progress on commissioning any significant research on quantifying gambling suicides highlights a major concern that many people involved in campaigning for the reform of gambling regulation and gambling researchers: the industry still exercises huge influence on those responsible for regulation, education and treatment. The message that gambling contributes substantially to suicides in the UK would provide a massive impetus for change.

In addition to a large scale quantitative study, we would also seek a wider research programme to understand more the motivation and development of suicidal thoughts and attempts which are related to gambling.

2. **Products and Practices** – we have provided a separate note on which products are most addictive and dangerous. That note explores some of the reasons why there has not been adequate research to understand the addictiveness of some products and what characteristics underlie this. Similarly, there is even less research on the impact of a range of practices of the industry including:

- targeted marketing and advertising
- inducements such as free bets/spins and bonuses
- VIP schemes
- affiliate marketing
- lack of affordability checks
- deposit limits
- time limits
- methods for identifying “problematic play” and interventions

This research will require that gambling operators engage fully in the research by providing access to the massive sets of data which they hold on customers. See below requirement for an **Independent Data Repository**.

3. **Longitudinal Studies** – there is a desperate need to be able to understand the development and progress over time of gambling disorder. Currently UK studies have to rely on “cross sectional” data sets (ie. surveys taken at a particular point in time). This allows some exploration of links between different factors, but it is virtually impossible to be able to study “cause and effect” without a longitudinal study.

Sweden has a long running longitudinal study which is partly enabled by the fact that gambling disorder is diagnosed within primary care in Sweden so that it is possible to identify a group of people to be able to follow over time. However, it is necessary to conduct longitudinal studies which include people not diagnosed with gambling disorder in order to be able to understand the development of the disorder.

A major problem with longitudinal studies is the cost and length of time that it takes to get any meaningful results. However, we feel that it is essential to establish a substantial **population wide study** and number of **targeted longitudinal studies** in order to understand the effectiveness of:

- **treatment interventions** – there is a lack of rigorous monitoring and follow up of patients receiving treatment for gambling disorder to understand what treatments work and what further support may be required; we have concerns that some treatments may even be “contra-indicated”. (See additional notes provided on treatment).

- **education interventions** – there is a shocking lack of rigorous studies to understand the impact of the very limited set of ‘educational/awareness’ activities which take place with children and adults; programmes are currently being offered with little theoretical basis and no proof of long term impacts and outcomes.

4. **Independent Data Repository** – gambling operators hold a massive amount of data on all aspects of their customers. This data is a very powerful resource in terms of being able to understand an individual’s engagement with gambling, including the development of serious problems. It also holds the clue to what products are the most dangerous and addictive.

We recognise that this data is both individually and commercially highly sensitive. But we believe that independent researchers should have free access to an anonymised version of this data set in order to be able to undertake a wide and powerful set of studies. We also recognise that it is a substantial undertaking to establish and maintain such a data set.

Therefore, we recommend that an **Independent Data Repository** should be established. We also recommend that gambling companies should be required to supply data to the repository in an agreed format as part of their licensing conditions. We are aware that there has been an initial feasibility study of such a repository, undertaken by at Leeds University. We commend this report to the Committee.

5. **Research Structures** – in addition to the suggestions for research to be carried out. We believe that changes do need to be made to the basic structures and processes for commissioning gambling research as follows:

- **Independent funding of research through a statutory levy on the gambling industry** – we believe that the inadequacies of the research programme around gambling is largely due to the influence of the gambling industry in both determining the content and scale of the programme. This must change. The statutory levy should be used to pay for research, education and prevention, and treatment and needs to be administered completely independently of the industry.
- **Gambling research centres** – the gambling research community in the UK is far too small. This is partly due to the funding and reputation of gambling. We believe that a small number of gambling research centres should be established – probably linked to universities. This would allow both the development of a healthy and diverse gambling research community and access to a pool of expert researchers who could provide ‘immediate’ advice for policy makers, regulators and others.
- **Open call for research** – however gambling research money is allocated, we believe that one element should be an open call for research proposals. While it is sensible to construct a research programme to meet the identified needs of policy makers, we need to recognise that researchers, experts by experience of gambling harms and others are likely to be able to identify issues for research based on their own detailed knowledge of gambling and gambling harms. We believe that there should be an open call for research ideas against a substantial fund allocated from the statutory levy.

Q182 **The Chair:** Give us your best single recommendation.

In addition to Charles Ritchie’s call to say that the industry cannot be left to self-regulation and that it had “demonstrated its inability to implement change without pressure from outside”, he would like to have added:

“A key illustration of the industry’s inability to implement change is the example of GAMSTOP. Back in 2013 the development and implementation of GAMSTOP was handed over to “the industry” by DCMS and the Gambling Commission.

By a terrible coincidence, on the 23rd November 2017 – the day after our son Jack had taken his own life because of his gambling addiction – Lord Browne had secured a debate in the House of Lords on online gambling. During the debate he referred to the fact that during the debate in 2014 he had been persuaded to withdraw his amendment to require a ‘multi operator self-exclusion scheme’ for online gamblers with the guarantee that this was in hand and that substantial progress would be made in 6 months. In fact development took a further 5½ years.

Now in 2020, the Gambling Commission has only just introduced the requirement that online operators must sign up to the resulting product GAMSTOP. There are still concerns about its reliability. It is inconceivable that a multi-billion high tech industry could not develop a self-exclusion tool within months if it had been to their advantage. However, they prevaricated and dragged their feet delaying implementation for 5 years.

If they and the Gambling Commission and DCMS had developed GAMSTOP in anything approaching their promised timescale, our son Jack would have been here today.

This is not an industry that can be relied upon to “do the right thing” or to do it quickly enough. The days of light touch and inadequate regulation must be consigned to the past.

The transcript of the HoL debate on 23/11/17 can be found at:

<https://hansard.parliament.uk/Lords/2017-11-23/debates/4939B7F6-844C-40C0-A420-38E931AE7DDB/OnlineGambling>

The key extract is as follows:

“My first engagement with online gambling came in 2014, when I responded to the Gambling (Licensing and Advertising) Act, which was narrowly concerned with online gambling. During the debates on the Bill I argued that online problem gamblers are discriminated against because they cannot access one of the main protections for problem gamblers—self-exclusion—on anything resembling a level playing field with offline problem gamblers.

...

In response to this I proposed, through amendments, multi-operator self-exclusion, whereby the online problem gambler needs to self-exclude only once with the Gambling Commission or its nominated body, and all online sites with a Gambling Commission licence are required to respect the self-exclusion. On Report the Government announced that they were finally persuaded of the need for multi-operator self-exclusion, but explained that they did not want to implement it on a statutory basis. I was asked to withdraw my amendment on the basis that the Government had asked the Gambling Commission to introduce multi-operator self-exclusion and it would make substantial progress towards its realisation in the next six months. Mindful of the Government’s willingness to compromise, I decided to withdraw my amendment. In June this year it was finally announced that the Remote Gambling Association would run multi-operator self-exclusion—or MOSES, as it is now referred to—for the Gambling Commission, and that it would be called GAMSTOP and would be up and running by the end of the year.

As we address this subject nearly four years later, I make the following points. ...

First, it is regrettable that nearly four years on from when the commitment was made we still do not have multi-operator self-exclusion up and running. We cannot afford to waste any more time.