



Betknowmore UK's Response to the Consultation: City of Bradford Metropolitan District Council Gambling Policy Review

About Betknowmore UK

Betknowmore UK was launched in 2014 and today we are a growing charity based in London. Our mission is to reduce gambling-related harms and we provide support to people from diverse communities who are experiencing gambling harms, empowering them and building hope. Our aims are to increase awareness of gambling-related harm, improve the health and wellbeing of the people affected, increase access to our services and strengthen the impact of lived experience.

Our response to the Call for Evidence

Our evidence comes from working with our clients over the previous seven years. We also have lived experience of gambling-related harms embedded within our organisation, from our founder and CEO through to our frontline staff and volunteers, and we draw upon this lived experience in our response below.

General comments

1. While the term 'problem gambling' is still in use with regard to the Problem Gambling Severity Index, as a general term it is now recognised to be offensive to those experiencing harmful gambling. The term implies that the 'problem' rests with the gambler, rather than with the operators, licensing authorities, structural inequalities within society etc. People with lived experience prefer the term 'harmful gambling' and this is now becoming the established terminology.
2. Given the high correlation between gambling harms and suicide (estimated to be one per day¹), suicide first aid training should be required for all frontline staff.

¹ House of Lords (2020) *Gambling Harm: Time for Action*, Select Committee on the Social and Economic Impact of the Gambling Industry, House of Lords, London.

Specific comments

3. Section 7.7 refers to:

- People who gamble more than they want to;
- People who gamble beyond their means;
- People who may not be able to make an informed or balanced decision about gambling due to a mental impairment, or intoxication by alcohol or drugs.

In our experience, people who are experiencing gambling harms often do not recognise that their gambling is causing them (and others) harm. They may be experiencing very high levels of harm and yet want to gamble more – this is the nature of addiction. This makes the category of ‘people who gamble more than they want to’ problematic. Similarly, many people who experience gambling harms can afford to ‘gamble beyond their means’; financial harms are just one indicator of a wide range of gambling harms. For example, someone who can afford to spend a high percentage of their income gambling may be neglecting their relationships, their health and their work. Finally, while some people may not be able to make an informed or balanced decision due to mental impairment, many more cannot because compulsive gamblers experience cognitive distortions that give them an illusion of control, that reduce their understanding of risk and reward, leading them to chase their losses. Some products are deliberately designed by gambling operators to stimulate such cognitive distortions. In sum, harmful gambling is very complex and cannot be reduced to simplistic indicators such as your three bullet points. The focus should be on the harms gambling causes, rather than the people who are doing the gambling.

4. Section 7.9 states that ‘Problem gambling can affect anyone at any time. Whilst rates of problem gambling among all adults in Britain tend to be less than 1% (1.4% in large metropolitan areas such as Bradford), there are some groups that are more likely to experience problems’. This percentage encompasses those experiencing only the most significant levels of harm i.e. PGSI 8+. This ignores all those people who are experiencing significant levels of harms, those at risk of harm (who need interventions such as awareness raising in order to prevent harm), and all those people who are affected by someone else’s gambling (estimated at 6-15 people, most of whom are women).

Recent research² based on big financial data and a very large sample of 6.5 million people tracked over seven years in the UK, found that nights awake (with a resulting health impact), unemployment and mortality increased markedly for the highest-spending gamblers, but gambling is also associated with negative outcomes even at lower levels of gambling. For example, a 10% increase in

² Muggleton, N., Parpart, P., Newall, P., Leake, D., Gathergood, J. and Stewart, N. (2021) The association between gambling and financial, social and health outcomes in big financial data, *Nature Human Behaviour*, <https://doi.org/10.1038/s41562-020-01045-w>

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gambling spend is associated with an increase in payday loan uptake by 51.5% and the likelihood of missing a mortgage payment by 97.5%. Also, tracking individuals between 2014 and 2019, the researchers found that higher gambling is associated with a higher risk of future unemployment and future physical disability. Gambling at high levels is also associated with levels of mortality at about one third higher than non-gamblers.

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