

# Behavioural Risk Audit of Gambling Operator Platforms

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Findings Report  
July 2022



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# Executive summary

BIT's Gambling Policy & Research Unit conducted a Behavioural Risk Audit of 10 gambling and betting operator sites between March and April 2022. Researchers explored the user journey from arriving to an operator's site through to closing an account.

## Key findings:

- **It takes longer to close an account than to open one.** This is often due to a lack of clear and accessible instructions about the cancellation process.
- **Gambling management tools exhibit 'frictions'.** On average it took three more actions to set up a deposit limit compared with placing a bet.
- **Several operator sites have a minimum account balance needed to withdraw money.** This may hinder some customers from closing their accounts.
- **Customers often receive no feedback about the time or money they spend gambling from operators.**
- **Operators often use defaults that are not in the customer's best interests.** Examples include defaulted stake and quick deposit amounts, both of which were greater than the minimum amount.

Behavioural Risk Audits are a valuable tool for researching online markets. They can identify practices impacting consumer outcomes and competition, and also provide in-depth information for policymakers and industry participants.

## Next steps



Publish findings report and gather feedback from a broad range of stakeholders



Hold workshops with industry participants, those with lived experience, and policymakers



Publish recommendations following the workshops, and scope out potential field trials

# 1. Background

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## Background

# BIT's Gambling Policy & Research Unit launched in September 2021

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[The Behavioural Insights Team \(BIT\)](#) has conducted research related to gambling since 2017.

[The Gambling Policy & Research Unit \(GPRU\) was launched](#) in September 2021. **The GPRU's mission is to discover, test and scale ways to minimise gambling harm.**

The GPRU is a dedicated team of specialists with a mandate to develop and rigorously test methods and approaches to significantly reduce gambling harms. The GPRU is funded through the [Regulatory Settlements process](#).

## Snapshot of research activities



Evidence reviews



Data science



Qualitative interviews



Reviews of gambling management tools



Mystery shopping



Bank data analysis



Online experiments



Field trials

## Background

# Our Behavioural Risk Audit identified features of operator websites that could put consumers at risk of making choices not in their best interests



### Design features can influence consumer decision making

- Our online behaviour is [shaped by the design and characteristics of the websites and platforms](#) we visit.
- Online environments often require users to process large amounts of information and make quick decisions.
- Cognitive resources demands on individuals mean website designs can thereby influence users' decisions. This can put users at risk of harm.



### The audit aimed to explore ways to reduce gambling harm

- In order to assess risks to users, we identified design features on operators' sites which may cause consumers to make choices not in their best interest.
- We plan to develop policy recommendations and to trial alternative designs on operator platforms based on our findings.



### Behavioural Risk Audits (BRAs) are multidisciplinary and flexible

- Throughout this project, we also aimed to learn about the potential value of sector-wide BRAs as a research and policy tool.
- BRAs can be used to investigate a range of user journeys and materials (e.g. websites, phone apps, adverts, making payments).
- However, to be most effective, BRAs each require a detailed research protocol and data collection framework.

## Background

# Several frameworks and resources from behavioural science informed the design and analysis of this Behavioural Research Audit

Behavioural concept	Definition
<a href="#">Defaults</a>	An individual's tendency to stick with a pre-selected option when presented with a choice
<a href="#">Anchors</a>	Reference points used when making decisions
<a href="#">Friction</a>	Minor actions which can make a task more effortful and may reduce the likelihood of task being completed
<a href="#">Framing</a>	The way in which information is presented to a user
<a href="#">Scarcity</a>	Lack of availability or time associated with a choice
<a href="#">Hot/cold states</a>	Factors affecting decision making related to our emotions (hot) or reasoning (cold)
<a href="#">Toying with emotion</a>	Use of language, colour or style to evoke an emotional response

**BIT operator mystery shopping**  
BIT ran a mystery shopping exercise ([2018](#)) exploring the customer journeys of six operator sites.

**CMA choice architecture report**  
The CMA published a report on [Online Choice Architecture](#) describing how online design features can both help and hinder consumer decision making and competition.

**Academic research on 'Dark Patterns'**  
[Dark Patterns](#) are user interfaces which are intentionally designed to confuse users and manipulate them into making decisions.

**Citizens Advice mystery shopping**  
[Citizens Advice](#) conducted a mystery shopping exercise on 20 most popular betting brands in 2021, as part of a larger piece of work on financial quicksand.

## Background — User Journey

In the Behavioural Risk Audit, we reviewed eight aspects of a typical user journey from opening an account to closing it



# 2. Methodology

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## Methodology — Overview

# We took various measures to build a framework that would minimise variability and researcher bias during the audit

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We designed an **observation framework**, a tool used to collect standardised observations at each phase of the audit. The framework was inspired by existing studies, was designed to include both open-ended and closed-ended questions, and collected quantitative and qualitative data.



The observation framework included **detailed instructions** for each phase of the audit. These instructions incorporated considerations such as ensuring that browsing histories did not interact with each operator site.



We **piloted the framework** on one of the sites. We asked the entire research team to independently audit the same site. We then came together to analyse our findings and explore how we could further refine the framework based on these.



We collected **screen captures** of all our observations so that further inter-researcher checks could be conducted after the initial audit.



We prepared a **central glossary** which defined and provided examples of specific design features so that researchers used consistent terminology across their observations.

# Our methodology comprised three stages: framework design, data collection, and analysis



### Stage 1: Framework design

- We designed an observational framework informed by desk research into operator regulations and behavioural frameworks. Relevant resources included:
  - GamCare [safer gambling standard](#)
  - Gambling Commission [consultation reports](#)
- We completed a project ethics review and researcher safeguarding guidance.
- We amended the framework based on pilot findings.



### Stage 2: Data collection

- We chose 10 of the most popular operator sites ([YouGov](#)) excluding lottery operators. See [Appendix 1](#) for a full list.
- We conducted data collection over a five week period. This primarily focused on browser pages rather than mobile-based apps.
- Data collection involved recording observational notes, taking screenshots of key stages, and reviewing direct operator communications received (for example, emails and notifications).



### Stage 3: Data analysis

- Researchers reviewed and cleaned their own data, e.g. screenshots were reviewed and missing data checked.
- Researchers reviewed each other's data and sense-checked for any missed observations, notes, and screenshots based on the framework.
- We reviewed data in line with our research questions at each stage and condensed our findings in summary tables.



# We conducted our analysis in two stages: shortlisting design features of interest and preparing a rapid evidence review of harm for each feature

### Analysis strategy



We reviewed data about our research questions at each stage of the user journey, for each operator site



We created summary tables of design features, relevant examples, and observations based on behavioural science



We conducted a rapid evidence review to identify the potential harm associated with selected features

### Research questions at each stage (selected)

Landing page	How are you encouraged to create an account? What offers are you shown? Is there restricted content without an account?
Sign up	How easy is it to sign up for an account? Does cross-selling occur? How is gambling harm and the support available for this introduced to customers?
Gambling management tools	How accessible are gambling management tools? What range of tools are there? How are consumers encouraged (or discouraged) to take up gambling management tools?
In-game play	What does it feel like to gamble? Do sites make it attractive to bet for longer or to bet more money? Are gambling management tools suggested before/during/after play?
Comms	What is the range and frequency of communications sent? Do the nature of communications change post gameplay?
Closure	How easy is it to close an account and to withdraw funds?

# 3. Findings

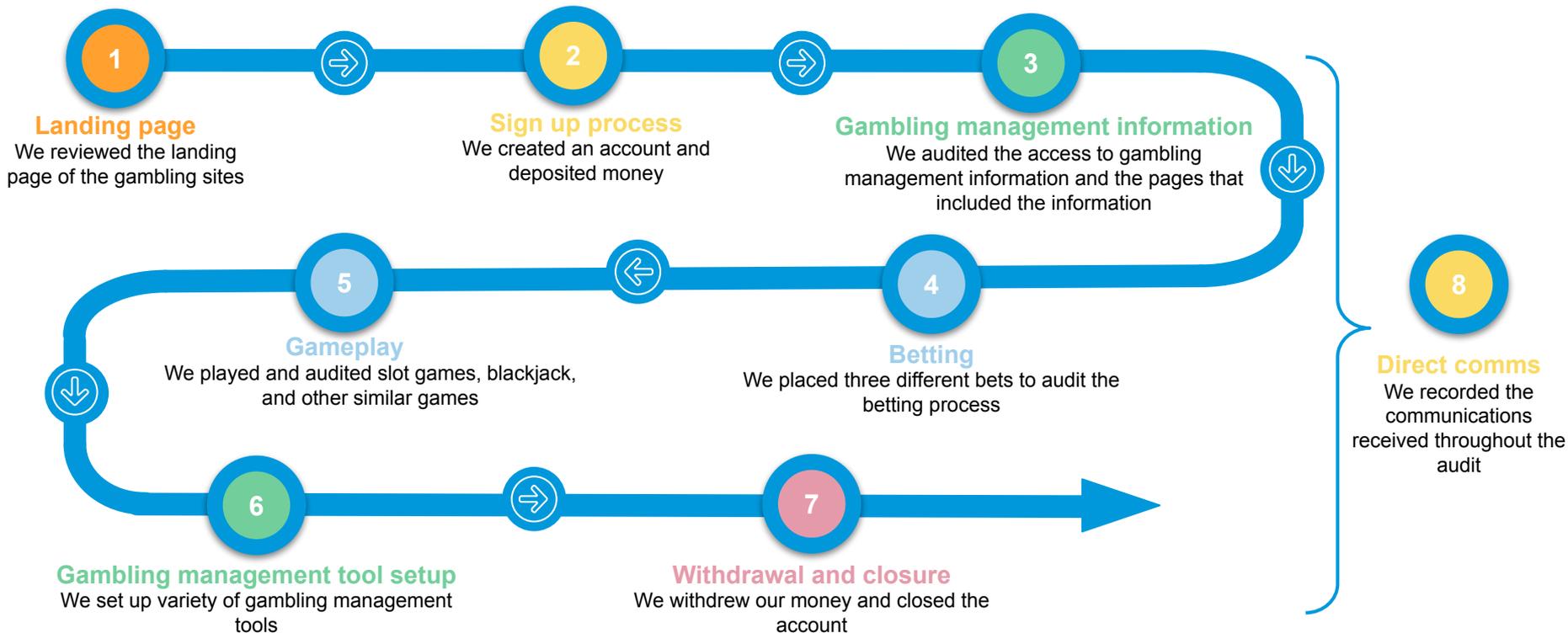
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## Findings

# We reviewed each stage of the user journey and organised our findings around these areas



## We visited the landing page of each gambling site



## Landing pages were information-heavy with limited references to gambling harm

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### Findings

1. For all operators, there were **no age reminders when entering a site prior to registering for an account**. For many operators there were no salient age reminders on-site. This can result in under-18s entering sites, which may in turn potentially increase the prevalence of underage gambling.
2. The landing pages on operator sites **tended to be too large to fit on one screen**. As a result of this users typically needed to scroll down to the bottom to see information about gambling management or ways to access support services, making these easy to miss.

### Solutions to explore



How can the number of under-18s visiting operator sites be minimised?



How can landing pages be designed so that gambling management, T&Cs, and help information are easier to locate?

## Finding 1: There were no age restrictions when entering a site prior to registering for an account.

### What we observed:

Key areas of several operator sites, such as virtual betting races, could be accessed without any age verification and watched on a live stream.

### How could this design be harmful?

Exposure to gambling at an early age can [lead to an increased interest in gambling in later life](#). Young people being exposed to gambling, e.g. via virtual races, could result in greater gambling behaviour once these people are legally old enough to sign up to a site.

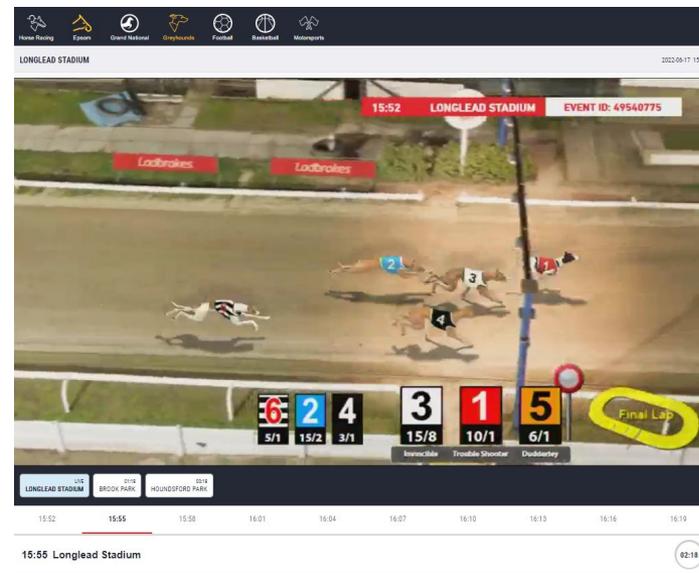


Image 1: Captured from [Ladbrokes website](#)

### Solutions to explore:

How can the number of under-18s visiting operator sites be minimised?

## Finding 2: The landing pages on operator sites tended to be long and require scrolling to access all the information

### What we observed:

- Offers and adverts tended to be positioned at the top of each operator's page alongside quick links to a customers' favourite bets and games.
- Scrolling down was usually required to view links to gambling support services, terms & conditions, and customer service support.

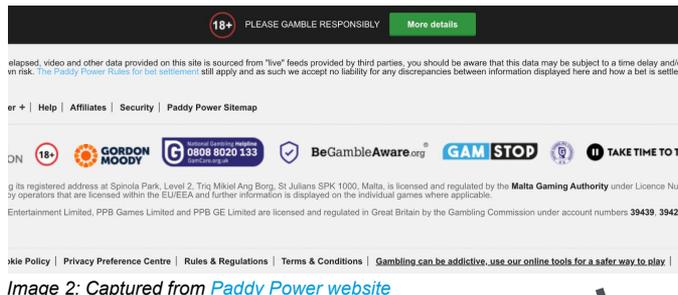


Image 2: Captured from [Paddy Power website](#)

### How could this design be harmful?

The visual hierarchy of the landing page focuses customer attention towards betting & gaming experiences and offers. The added friction of needing to scroll down the page for information related to gambling management tools and support services may result in some customers missing this information.

### Solutions to explore:

How can landing pages be designed so that it is easy for customers to access gambling management information from the start and throughout their user journey?



Image 3: Captured from [Paddy Power website](#)

For each operator, we created an account and deposited money in it



# It was much easier to sign up for an account compared to closing one

## Findings

1. For most operators, the sign up process was frictionless and straightward to complete. Notably, this process was much easier and faster compared to closing an account.
2. For 5/10 operators the customer was **automatically signed up to other brands/products** of the same parent company when creating an account. This resulted in the customer receiving communications advertising a partner brand and other types of gambling opportunities.
3. For the majority of operators there was a **default minimum deposit amount** to open an account. At least 3/10 operators used anchoring with amounts greater than the minimum deposit required.
4. At least two operators sent **customers welcome emails prior to them completing the sign up process**
5. At least four operators used a **defaulted quick deposit amount that was not the minimum amount to deposit**. For example, on one operator site there was a button that enabled the customer to deposit £20 in one click.

## Solutions to explore



How might we build steps into the sign-up process to make it easier to manage spending (e.g. setting a deposit limit)?



How can we give customers choice over the brands and products they are exposed to?



How can we design effective defaults that are aligned with consumer preferences?



How can we ensure that customers do not feel pressured to sign up?



How do we ensure customers do not deposit more money than they plan to?

## Finding 1: It was much easier to open an account than to close one

### What we observed:

There were minimal steps and limited frictions when opening an account: [86% of online gamblers say it's easy to sign up to online gambling websites](#). Information required included name, DOB, email, mobile, postcode and consent to operator privacy policies, as depicted in the screenshots to the right.

Please fill in all fields of this short form. It will help us validate your identity to comply with our legal obligations and allow you to enjoy our services.

**Title**

Mr Mrs Ms Miss

**First name** **Surname**

**Date of birth (dd/mm/yyyy)**

DD MM YYYY

**Email**

e.g. john.smith@company.com

**Mobile**

e.g. +44 07400 123456

**Postcode**

e.g. SW51JW **Find address**

**Continue**

Image 5: Captured from [William Hill website](#)



**Username**

e.g. PeterSmith\_1978

**Password**

Show

**Security question**

Anniversary date

**Your answer**

**Set a deposit limit**

Daily Weekly Monthly

**Choose limit**

**Add a promo code**

I want to receive news about bonuses, offers, free-to-play games and services via email, SMS or telephone. You can update/adjust your preferences at any time.

By clicking the Agree and Join button below you confirm that you are 18 or over and you accept the [Terms & Conditions](#), [Privacy Notice & Age & Verification Policy](#) as published on this site. This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply. In order to comply with our legal obligation to meet UK Gambling Commission guidance on affordability checks, we use TransUnion to provide verification services which involves sharing some of your personal data with TransUnion. You can read more on how we use your personal data in our [Privacy Notice](#). Our affordability checks will not negatively impact your credit score.

**Agree and Join**

**< BACK**

Image 6: Captured from [William Hill website](#)

### How could this design be harmful?

- Holding a greater number of accounts with different operators has been [associated with a higher level of risk](#) of gambling related harm.
- The lack of friction in the sign up process could result in a customer signing up to more accounts whilst in a hot state. Increased friction would slow down the process, allowing customers to pause and move into a cold state, and reflect whether they need another account.

### Solutions to explore:

How might we build steps into the signup process to make it easier to manage spending?

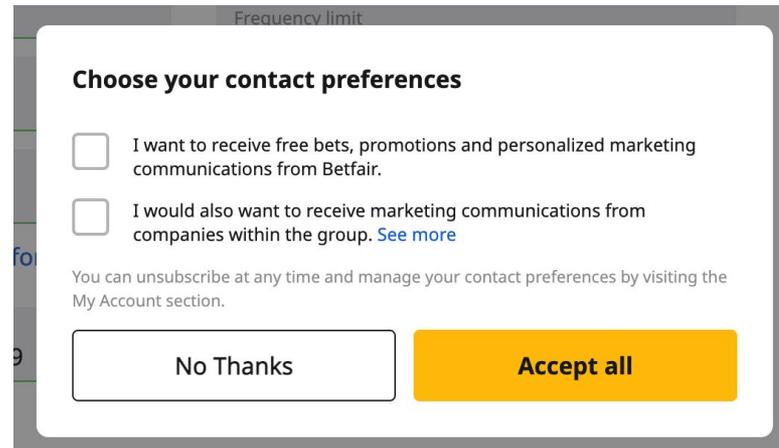
## Finding 2: For 5/10 operators, customers were automatically signed up to other products of the same parent company when creating an account

### How could this design be harmful?

- Researchers began to receive emails from other brands of the same parent company advertising related products
- A user who initially joined to bet may view offers for casino games and begin gambling across multiple different types of games, which is known to be more [harmful](#)

### Example of good practice

Some operators were **more proactive** in giving customers choice over contact preferences compared to other brands during the signup process.



The screenshot shows a contact preference form titled "Choose your contact preferences" with a "Frequency limit" header. It contains two unchecked checkboxes: "I want to receive free bets, promotions and personalized marketing communications from Betfair." and "I would also want to receive marketing communications from companies within the group. See more". Below the checkboxes is a note: "You can unsubscribe at any time and manage your contact preferences by visiting the My Account section." At the bottom are two buttons: "No Thanks" and "Accept all".

Image 7: Captured from [Betfair website](#)

### Solutions to explore:

How can we give customers choice over the brands and products they are exposed to?

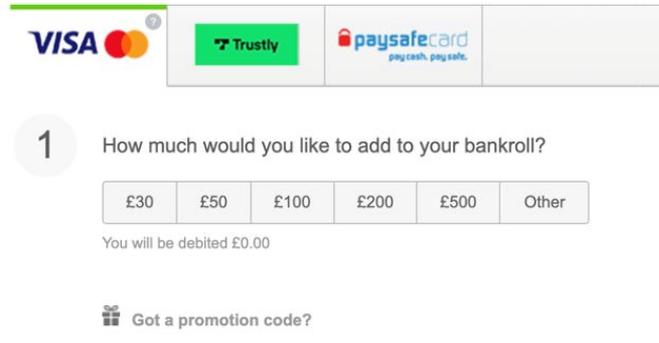
## Finding 3: Anchors were used across the sign-up process, including when asking customers to make a deposit

### What we observed:

- The majority of operators required an initial deposit to set up an account
- For 3/10 operators, anchors were used where customers were shown an option that exceeded the actual minimum deposit amount. Often customers would need to click 'other' in order to see a free text box that they could type into.

### How could this design be harmful?

When making a decision, people can easily be influenced by a suggested reference point — that is, an [anchor](#). Exposure to higher deposit options when selecting an initial deposit may influence customers to make a higher initial deposit than needed.



The screenshot shows a payment selection interface. At the top, there are logos for VISA, Mastercard, Trustly, and PaysafeCard. Below this, a question asks 'How much would you like to add to your bankroll?'. The answer options are £30, £50, £100, £200, £500, and Other. Below the options, it states 'You will be debited £0.00'. At the bottom, there is a checkbox for 'Got a promotion code?'.

Image 8: Captured from [888 website](#)

### Solutions to explore:

How can we design effective defaults that are aligned with consumer preferences?

## Finding 4: At least two operators sent customers welcome emails prior to users completing the sign-up process

### What we observed:

- When researchers were delayed in completing the sign up process, they observed that they had still received emails welcoming them to the site
- The sites appeared to send the emails once they had entered their name and email address, to encourage them to complete the registration process

Hi,

We noticed that you didn't quite finish signing up for your **tombola account!**

We just need a few more details, then you can start playing with up to **£50 extra** with your **200% first deposit bonus**.

Need a hand? Contact our **24/7 support team** if you have any issues or you need a little bit more information on becoming a **tombola player!**

[Register Now](#)

Image 9: Captured from [Tombola website](#)

### How could this design be harmful?

Sending follow up emails highlighting potentials offers may incentivise people to continue the sign up process, despite having a good reason for not completing it previously e.g. moving from a hot to a cold state.

### Solutions to explore:

How can we ensure that the customers do not feel pressured to sign up?

## Finding 5: At least four operators used a defaulted quick deposit amount that was not the minimum amount needed to deposit

### What we observed:

- Operators offered a quick deposit button that allowed the customer to deposit money easily. However the defaulted amount was much higher (£20) than the minimum required (£5)
- Having a one click 'deposit' button made the transaction very easy and appealing

### How could this design be harmful?

Customers often take the [path of least resistance](#), accepting the defaulted option — an option that will remain if the chooser does nothing. If the default can't be changed so it aligns with their preference, the customer may spend more money than they can afford.

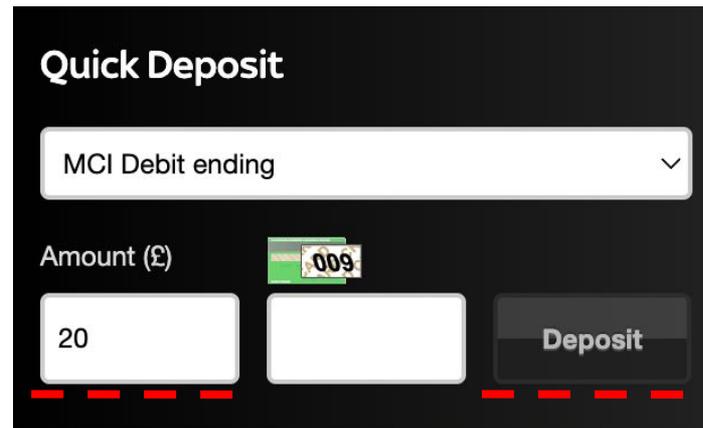


Image 10: Captured from [SkyBet website](#)

### Solutions to explore:

In what ways could we ensure that customers do not deposit more money that they plan?

## We audited the access to gambling management information and other pages that included that information



## Gambling management pages were not easy to find and contained too much information

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### Findings:

1. Gambling management pages were often **difficult to find** due to discrete links to the webpages. For half of the operators, it was more difficult on an app compared to the website, which may reduce the uptake of gambling management tools further as [more than 3 in 5 people who gamble online use their smartphone](#)
2. Gambling management tool pages **contained much more text** than the other pages on operator sites. Examples of information overload were found in 6/10 operators, where their gambling management tool pages contained significantly more information in comparison to other pages on the operator site
3. For 6/10 operators, customers could **see promotions when on the gambling management page**. This can be distracting and encourage the user to click on promotions, rather than read the gambling management information

## Solutions to explore



In what ways could we make it easier to find gambling management information?



How might we make gambling management information more accessible?



How can we design gambling management pages with minimal visible promotions?

## Finding 1: Gambling management information was often difficult to find, and for 5/10 operators it was more difficult on apps

### What we observed:

- It was harder to locate the gambling management page on apps compared to webpages. For 5/10 operators, the link to the page could not be seen anywhere on the homepage and extra steps were needed to find the information
- On the webpage, the gambling management button was hard to locate and was embedded within other options

### How could this design be harmful?

Using features that make it difficult to notice the link leading to gambling management page, or not including it at all can result in people not being aware of the tools that they can use. For example, in 2020, [63% of gamblers were not aware of the existence of the reality check tool](#) and [72% were unaware of gambling blocking software](#).

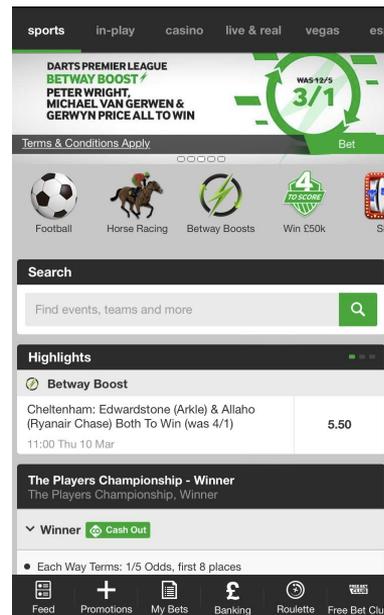


Image 11: Captured from [Betway](#) app

### Solutions to explore:

In what ways could we make it easier to find gambling management information?

## Finding 2: Gambling management tool pages contained much more text than other pages on an operator's site for 6/10 operators

### What we observed:

The design of gambling management tool pages were much more information-heavy than other pages. This could appear overwhelming to customers.

### How could this design be harmful?

Information overload is [almost always harmful to the customer](#) as it has too much information for the user to process and the most important information is difficult to find and access. In this case, it may reduce the likelihood of them setting up tools.

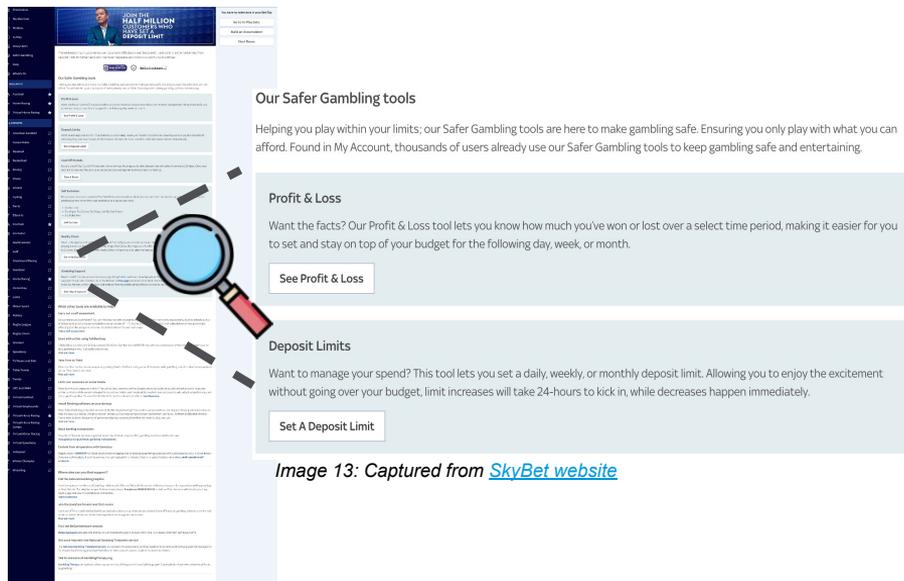


Image 12: Captured from [SkyBet website](#)

### Solutions to explore:

How might we make gambling management information more accessible?

## Finding 3: For 6/10 operators, customers could see promotions when on the gambling management page

### What we observed:

Across multiple operators, the gambling management page contained offers and promotions which could not be closed.

### How could this design be harmful?

Customers who are at higher risk of experiencing gambling harm are [more likely to use more promotions](#). Higher-risk customers are more likely to need to use the gambling management tools, and are therefore at risk of being distracted from setting up the tool.

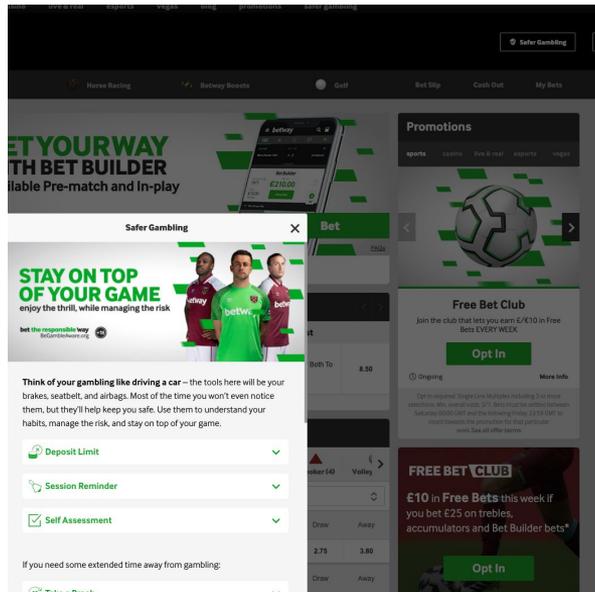
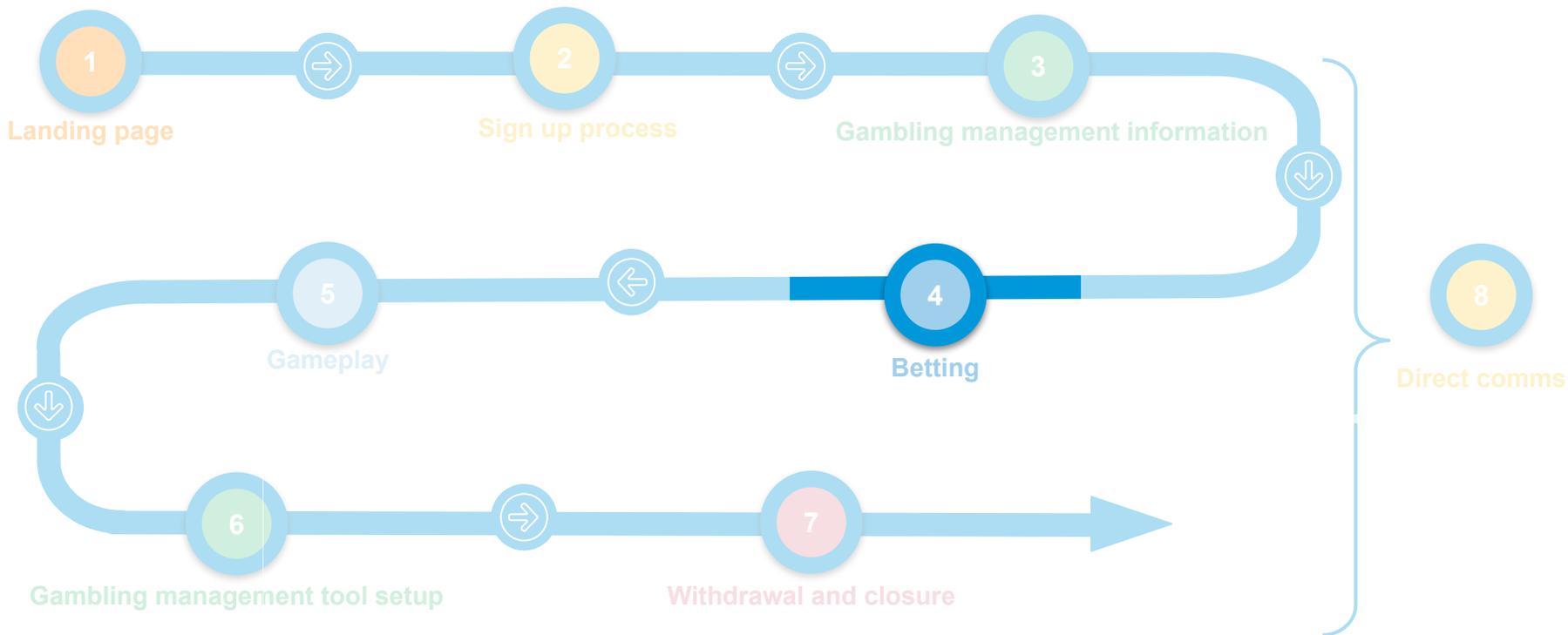


Image 14: Captured from [Betway website](#)

### Solutions to explore:

How can we design gambling management pages so no promotions are visible?

## We placed three different bets to audit the betting process



## The betting process contained minimal frictions with limited feedback on the outcome of bets

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### Findings:

1. No **receipts or direct communications were received after placing a bet** for any of the operators. Furthermore, no web based notifications were sent sharing the outcome of the bet
2. 6/10 operators had **prompts to place another bet immediately after placing one**, buttons such as 'Add previous selection to Betslip' were shown to prompt the user to bet the same again with one click
3. For 8/10 operators, **a bet could be placed with one click**, making it easy with minimum friction
4. 6/10 operators had **scarcity or popularity claims on their site** such as countdown timers or flashing icons for bets
5. Across all the operators there was evidence of colour being used to encourage customers to place bets. Often, **the more desired behaviour was made more salient** e.g. showing 'bet now' in a big, bright button

## Solutions to explore



How can bet slips and the bet placing process be **designed to minimise harm** and help customers make an informed choice?



How can we encourage customers to **reflect and take a break** between placing bets?

## Across all operators, betslips present placing a bet as the most attractive option to customers, and repeat bets could be placed with one click

### Ease of betting:

The sites were designed for bets to be placed with minimum friction. For eight operators, a bet could be placed with only one click

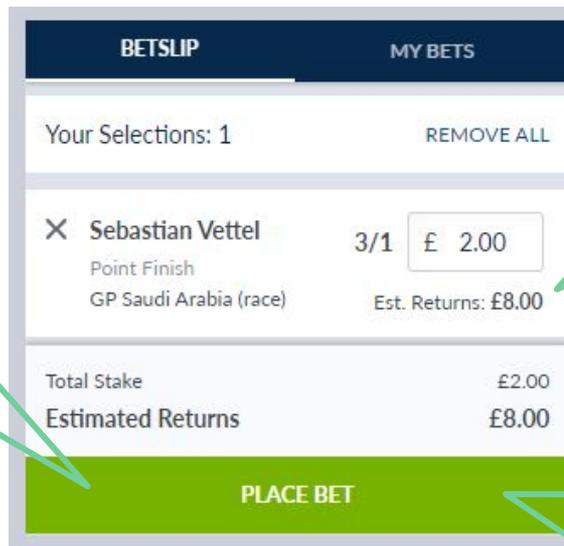


Image 16: Captured from [Coral website](#)

### Salience of estimated returns:

Across the majority of operators, estimated returns were in a larger font, bolded and repeated. This design makes it more likely to be attended to and focused on by customers as opposed to the bet they are placing

### False hierarchy example:

For 7/8 operators, the 'place bet' button is colourful and highlighted, which makes it more salient to a customer, whilst the 'remove all' option is much smaller. Furthermore, the cancel button is often in muted tones and greyed out

### Solutions to explore:

How can bet slips and the bet placing process be designed to minimise harm and help customers make an informed choice?

After placing a bet customers are prompted immediately to bet again. This sense of urgency is increased further by the presence of countdown clocks

**Prompts to bet again:**

- 6/8 operators prompt customer to place the same bet again
- 5/8 operators prompt customers to place another bet on a different sport or match

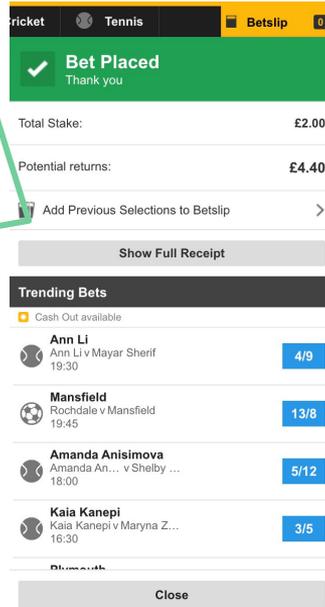


Image 17: Captured from [Betfair website](#)

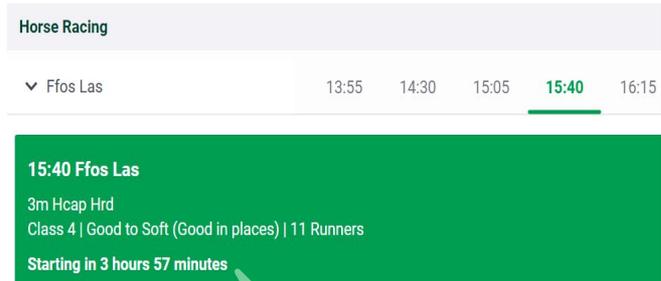


Image 18: Captured from [Paddy Power website](#)

**Lack of result updates sent:**

No updates were received for any of the operators regarding the outcome of a bet. It required a customer to go into their betslip and look at previous bets to see their losses/ winnings

**Sense of urgency:**

4/10 operators included features such as timers or clocks, which counted down to when a bet can no longer be placed. Customers may feel under greater pressure to place a bet due to fear of missing out on an opportunity

**Solutions to explore:**

How can we encourage customers to reflect and take a break between placing bets?

## We played and audited slot games, blackjack, and another similar games



## It was difficult to keep track of wins and losses during gameplay

### Findings:

1. **There was a lack of prompts during gameplay for customers to understand the time and money spent during gameplay.** 5/10 operators did not have net position shown during gameplay, meaning customers may not know how much they have won or lost
2. **Losses were not made clear during gameplay for 7/10 operators.** Information could also be misleading e.g. for one operator when betting £0.20 and losing £0.10, a message of 'Won £0.10' appeared, which could make the customer think they had won
3. 7/10 operators used defaults in games, where **the defaulted stake amount was higher than the minimum stake values**; for example the default stake was £1, when the minimum was £0.10
4. 6/10 operators had **prompts to keep playing or play a new game during or immediately after finishing a game**

## Solutions to explore



How can games be designed so players are informed of their spend and time spent?



How can casino game environments be designed to help players remain in control of their decisions?

## During gameplay, it was easy to lose track of the amount won and lost, with no overall summary or receipts provided to customers after each session

**Added friction to access instructions:** Customers have to click on the menu to find instructions on how to play the game after the initial tutorial, which could be skipped easily

**No net position is shown:** 5/10 operators did not show the net position of the customer, **meaning they may not know how much they have won or lost. For an additional three operators it was not easily noticeable**

**Losses are not clear:** For 7/10 operators losses were not made clear during gameplay, and could be misleading

**Defaults:** 7/10 operators used defaulted stake amounts that were higher than the minimum stake amount

**Use of intermediate currency:** Several operators used coins or chips as opposed to currency values, which can disconnect a customer from their real spend



Image 19: Captured from [Paddy Power website](#)

### Solutions to explore:

How can games be designed so players are informed of their spend and time spent?

## Some operators focused on re-creating the casino experience within their games, or adding in online chats with other players

**Prompts to keep playing:** 6/10 operators had prompts to keep playing after each round ended. This can result in customers playing more than they intend to due to being in a hot state already

**Colours and music:** Use of both to keep the user more engaged and create a more realistic depiction of a casino



Image 20: Captured from [Ladbrokes website](https://www.ladbrokes.com)

**Social/ community prompts:** 3/10 operators had a live chat window open during game play, whereby players could talk to one another and with staff members

**No information on game play time:** Length of gameplay was **not** shown for 5/10 operators, and was not made salient for an additional four operators

### Solutions to explore:

How can casino game environments be designed to help players remain in control of their decisions?

## We set up a variety of gambling management tools



## There were a lot of steps and friction when trying to set up gambling management tools

### Findings:

1. For all operators, it was far **more challenging to set up gambling management tools than to play games or place bets**. The complicated and extra steps needed to find the information and set up the tools may discourage consumers from taking up these tools, resulting in potentially greater harm during gameplay and depositing money
2. 6/10 operators used gambling management tool **defaults** that guided the user to set tools in a way that may not be effective. For example, the default for reality check tools was set at four hours, when actual options ranged from 15 minutes to four hours
3. 5/10 operators **did not provide free text boxes to users when changing or setting up a deposit limit**, as was found most effective at reducing gambling harm in BIT's previous field experiment. In our [previous work](#), we recommended that deposit limit tools should provide a free text box for customers to enter their desired limit rather than pre-defined denominations

## Solutions to explore



How might we make gambling management tool set up as easy as placing a bet?



How could we ensure that customers make the best choices during gambling management tool setup to reduce harm?



How could operators be encouraged to incorporate free text boxes in their gambling management tools?

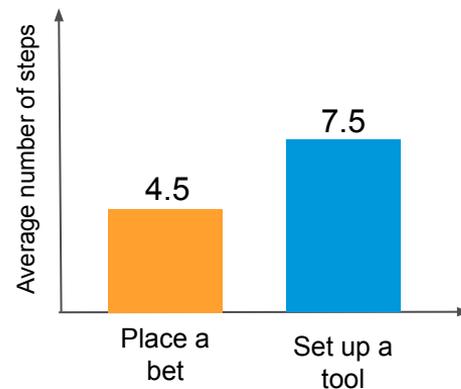
## Finding 1: it was far more challenging to set up gambling management tools than to place bets

### What we observed:

On average, it took 3 steps more to set up deposit limit than to place a bet. In addition to the extra steps, there was more friction around setting up tools, such as having to log out of the account, or contact customer service.

### How could this design be harmful?

- If the effort to set up a tool is very high it may put people off setting up tools.
- In BIT's [previous work](#) we found an increase in the number of tools being set up when the process was made easier by removing frictions.



### Solutions to explore:

How might we make gambling management tool set up as easy as placing a bet?

## Finding 2: Ineffective anchors and defaults may lead customers to spend more time and money in long run

### What we observed:

- **Anchors:** Deposit limits are anchored to the highest amount, rather than providing a free text box
- **Ineffective defaults:** 6/10 operators used defaults that guided the user to set tools in a way that may not be most effective e.g. reality check length options were defaulted to four hours, when actual options ranged from 15 minutes to four hours

### How could this design be harmful?

People often choose the easiest options, such as defaults or first option on a list. Thus, having anchors or defaults can lead customers to set up tools that might not be useful and, in turn, spend more time and money on gambling.

#### Deposit Limit

Set a limit on the amount you can deposit for a period you choose. This will reset at the end of each frequency limit.

Frequency limit  
Daily

✓ 10000  
1000  
500  
200  
100  
50  
20  
10  
5

Image 21: Captured from [Betfair website](#)

#### Session Reminder

Session reminders help track the time you spend playing. If you reach your selected time we'll notify you and you can continue playing, log out or view your account history.

The timer starts when you log in. You can change the frequency of reminders at any time. The new time will take effect the next time you log in.

Live & Real games from Evolution have their own notification settings within the game.

On Scientific Games slots the session reminder will reset when you exit a game. We advise you set a shorter session reminder if playing these games.

Reminder Period

1 hour

Image 22: Captured from [Betway website](#)

### Solutions to explore:

How can customers be supported to make the safest choices during tool setup

### Finding 3: Free text boxes are not consistently used in gambling management tool setup, despite evidence suggesting they are effective at reducing harm

#### How could this design be harmful?

Using anchors in deposit limits is likely to influence customers to select a higher deposit limit amount that enables them to deposit and spend more money

#### Example of good practice

A previous [BIT trial](#) found that replacing deposit limit anchors with free text boxes led to a 45% reduction in the size of deposit limit chosen by customers.

During the audit **only 5/10 operators** used free text boxes during the deposit limit setup process, as shown in this example. **Only two operators** used a free text box for the deposit limit during the signup process (the point at which people are most likely to set a limit).

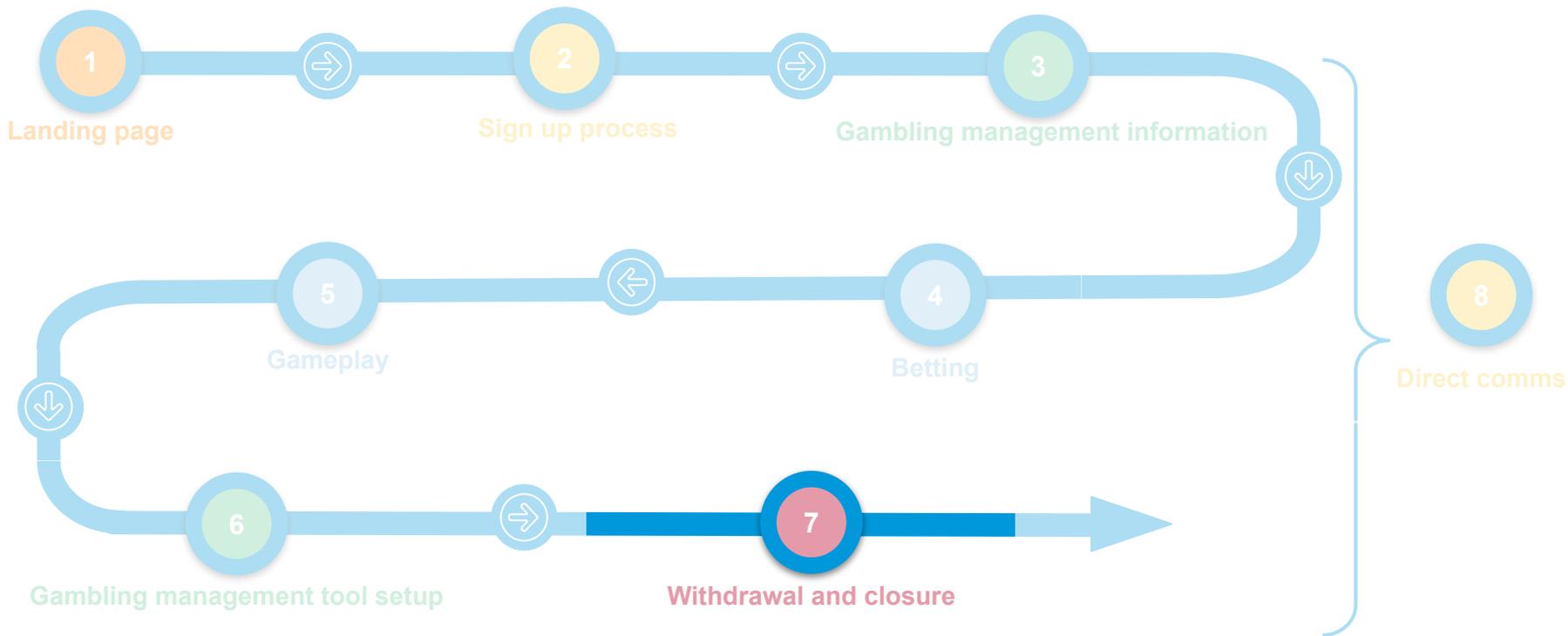
The screenshot shows a user interface for setting a deposit limit. It includes a dropdown menu for a security question with the value 'Father's first name?', a text input field for the security answer, a section titled 'Deposit Limit' with explanatory text, a dropdown menu for the time period set to 'Daily', and a text input field for the limit amount in GBP.

Image 23: Captured from [Paddy Power website](#)

#### Solutions to explore:

How can operators be encouraged to incorporate free text boxes in their gambling management tools?

## We withdrew our money and closed our accounts



## We observed a lot of friction in the closure process

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### Findings:

1. 8/10 operators had a **minimum account balance required to withdraw funds**. If a user wanted to withdraw their money, this is a substantial barrier. This was similar to [Citizens Advice findings](#), where 49% of the people who gamble online said that they were required to have a minimum amount in their account to withdraw their funds
2. For 6/10 operators, there were **substantial barriers to finding any information on the account closure** process in the website search feature. For some operators searching for 'cancellation' brought up no relevant pages — users had to type 'closure' — making it difficult to find the information
3. For 6/10 operators we had to **contact customer support in order** to close our account. This adds friction to the process and may discourage customers from closing their accounts
4. 7/10 operators had **'immortal accounts'** which could be very easily re-opened or not be closed

## Solutions to explore



How can operators remove barriers for consumers wanting to withdraw their money?



How can we make it easier for customers to find information on how to close their account?



How can we ensure that customers can easily close their accounts?

## Finding 1: 8/10 operators had a minimum account balance required to withdraw funds

### What we observed:

- This restriction was not made clear to customers during the sign up process with limited guidance on next steps.
- For at least one operator, we found that this 'minimum amount' could be overcome by contacting customer services. However, this information was only available upon searching in the help pages, which many users may not do

### How could this design be harmful?

Being unable to withdraw funds could create an extra barrier for a customer wanting to close their account, due to concern over losing out on money they're owed. Keeping an account open means they may keep gambling

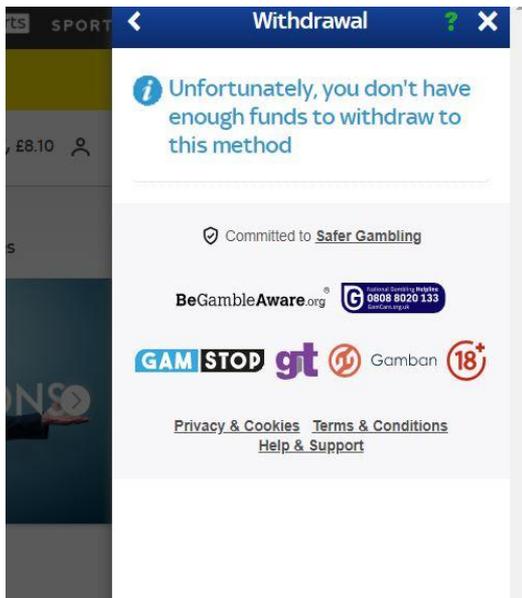


Image 24: Captured from [SkyBet website](#)

### Solutions to explore:

How can operators remove barriers to customers being able to access their funds?

## Finding 2: For six operators, we encountered barriers when trying to locate information on their closure process

### What we observed:

- For some operators, searching for “cancel/close my account” did not find any results on how to close the account
- For other operators searching for ‘cancellation’ brought up no relevant pages, whereas ‘closure’ did
- In some cases, a separate Google search was required to locate guidance

### How could this design be harmful?

The added friction from having to locate information on how to cancel your account could be enough for many customers to give up trying to. Customers who are at risk of harm, who are wanting to close their account, may be unable to work out how to, therefore creating a further barrier.

### Solutions to explore:

How can we make it easier for customers to find information on how to close their account?

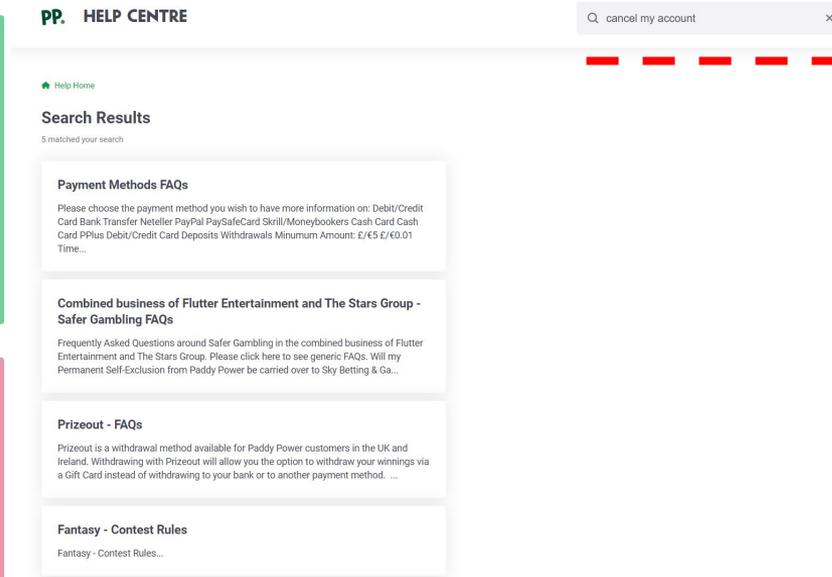


Image 25: Captured from [Paddy Power website](#)

## Finding 3: It was much easier to reopen an account than it was to close it

### What we observed:

- Guidance on how to reopen an account was readily available to customers and accounts were easy to reopen if requested
- Using a green button to quickly contact the customer support to re-open an account removes friction

### How could this design be harmful?

The visual design of the reopen account pages implies to customers that the preferred option is to reopen their account. This framing could result in customers reopening their account, despite it being more beneficial to keep them closed

### Solutions to explore:

How might we make it more difficult for customers to re-open their account?

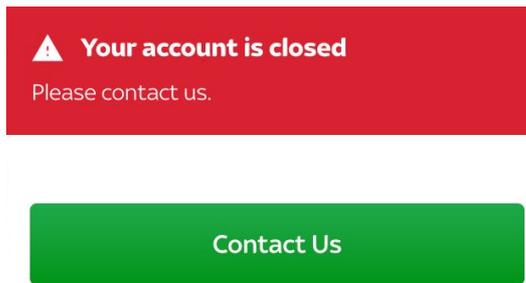


Image 26: Captured from [Skybet website](#)



Image 27: Captured from [William Hill website](#)

## Finding 4: 7/10 operators had 'immortal accounts', whereby we were unable to fully close the account, or the account could be easily re-opened

### What we observed:

- Account closure processes was complicated and unclear for the majority of operators audited
- For some operators, account closure was referred to as a reversible 'block' as opposed to complete closure
- When closing an account customers were reminded of the minimal steps required to reopen it

### How could this design be harmful?

The account closure process shows **multiple examples of added friction**. These added steps can make closing an account appear more challenging and **impact the likelihood** of a customer going through with the process. A customer may be less likely to close their account because of this.

### Solutions to explore:

How can we ensure that customers can easily close their accounts?

Please choose one of the options below.

- I want to close my account or sections of it
- I'd like to take an irreversible time-out or exclude myself from gaming

If you want to close your account or only specific sections of it (Bingo, Casino, Poker or Sports) please consider this option.

Please note you will still be able to:

- Withdraw funds online
- Reopen the closed sections at a later date

You will no longer be able to:

- Perform any game activity on the closed section of your account
- Open a new account

CONTINUE

CANCEL

Image 28: Captured from [Coral website](#)

## We recorded communications received during the audit



## In the communications, we did not receive any receipts, security updates or activity statements

### Findings:

1. In the emails we received from the operators, **we did not receive any receipts of deposits, security updates when logging in from a new device, or updates about activity on the site.** These are all communications online retailers and services typically provide. In addition, there were few emails where the main purpose was gambling management. In general:
  - 80% of the emails we received were offers and direct marketing
  - 9% of emails focused on gambling management
  - 6% of emails were account updates (such as verification update, and balance updates)
  - 5% were other emails (such as asking for feedback on the betting process)
2. We did **not receive any communications from any of the operators around activity statements** that would have showed the amount of money or time spent on the site, or any updates on our existing bets/games. In addition, it was difficult to find this information on the sites — it was usually hidden away and took several steps to locate
3. For 7 operators, customers faced **extra friction when trying to unsubscribe from communications**, including receiving scarcity type messages

## Solutions to explore



What would happen if consumers were sent receipts for their deposits and withdrawals?



In what ways might we be able to inform customers of their wins, losses and spending?



What would happen if there were fewer offers sent to customers?

UNSUBSCRIBE



How can we ensure that customers are not discouraged from unsubscribing from marketing?

## Finding 1 (1/2): The main communication received were offers and direct marketing that guided the user to the site

### What we observed:

There was evidence of Dark Patterns being used within the direct communications sent to customers:

- **Use of colour and toying with emotions:** the offers in the emails were colourful and eye-catching
- **False hierarchy:** the use of green buttons in contrast to the plain text made it more attractive to accept the offer

### How could this design be harmful?

Bold designs with colourful buttons and emotive language can easily influence a users intended behaviour. Humans are attracted to salient messages and images, and the visual design used in these comms subtly imply the correct decision a customer should make. The recipient may not be intending to gamble, but could then receive this email and fail to resist doing so.



Image 29: Captured from [Betfred](#) email

### Solutions to explore:

How can app notifications inform customers about gambling management in addition to offers?

## Finding 1 (2/2): The main communication received were offers and direct marketing that guided the user to the site

### What we observed:

- **Offers:** app notification included many offers that were very easy to click on and use
- **Use of urgency and scarcity claims:** 7/8 operators used time-limited messages in their communication, which included offers or information on upcoming bets/games

### How could this design be harmful?

This plays on the sense of urgency and encourages users to go on the site and use the offers as they might feel that otherwise they might lose a “good deal”.

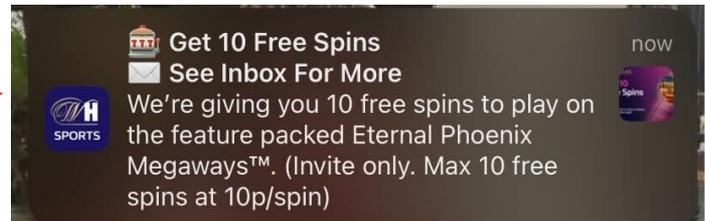


Image 30: Captured from [William Hill](#) app notification

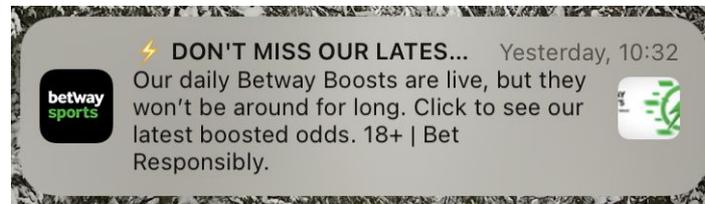


Image 31: Captured from [Betway](#) app notification

### Solutions to explore:

How can app notifications inform customers about gambling management in addition to offers?

## Finding 2: We received minimal feedback from operators regarding time or money spent during a gambling session

### What we observed:

We did not receive any communications from any of the operators that showed the amount of money or time spent on the site, or any updates on our existing bets/games outcomes. In addition, it was difficult to find this information on the sites themselves: the information was usually hidden away and took several steps to locate.

### Example of good practice

There is growing evidence to suggest that sending customers [activity statements](#), which summarise their monthly spending behaviour has been beneficial in reducing customer spend and increasing awareness of their spending behaviour.

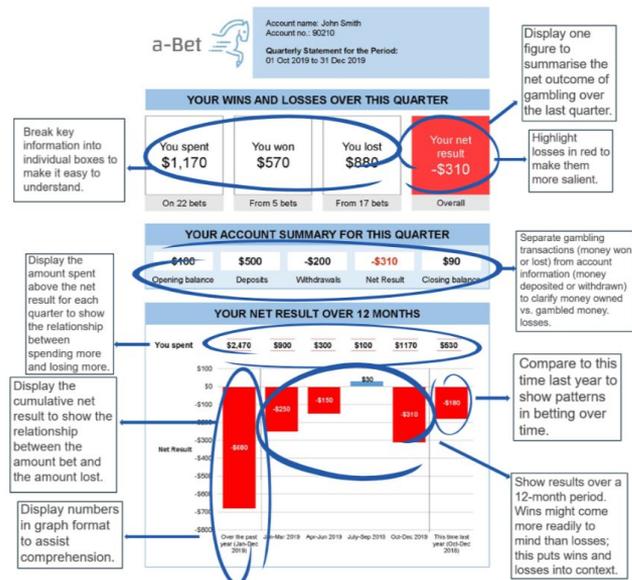


Figure 3: Example of activity statement from [Anderson et al. \(2020\)](#).

### Solutions to explore:

In what ways might we be able to inform customers of their current wins, losses and spending?

## Finding 3: For 7/10 operators, it was not easy to unsubscribe from communication due to the extra steps and friction

### What we observed:

There were several examples of Dark Patterns within the communications customers received when they tried to unsubscribe from marketing including:

- **Toying with emotions:** The customer was made to feel guilty about wanting to unsubscribe
- **False hierarchies:** The link to view offers was a more salient green, compared to the white box used for the 'unsubscribe' option

### How could this design be harmful?

Customers who want to unsubscribe may not follow through with their decision when faced with added frictions and offers. They may have continued to receive direct marketing which could result in them gambling more.

### Solutions to explore:

How can we ensure that customers are not discouraged to unsubscribe from marketing?

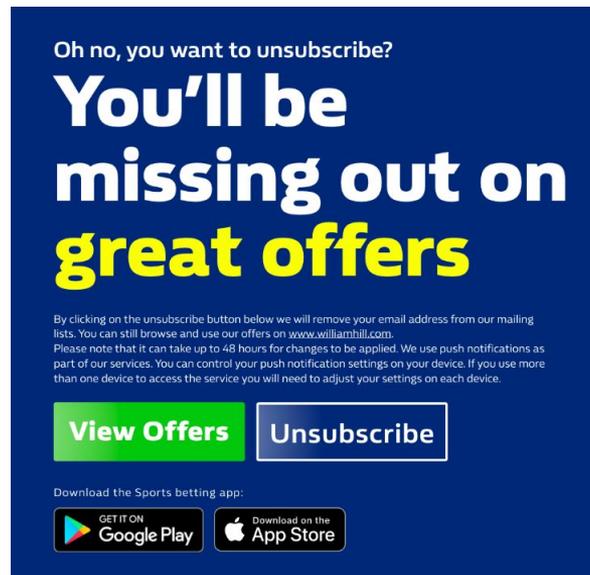


Image 32: Captured from [William Hill](#) email

# 4. Next steps

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## Next steps

# Behavioural Risk Audits have significant potential as a tool for researching online markets to identify practices impacting consumers and competition



### Opportunities

- Identify positive and negative practices impacting consumers and competition.
- Help prioritise areas for testing to reduce harm or increase competition.
- If run regularly, they can be a good resource for observing changes.
- Useful for policymakers, operators, research and consumers.



### Best practice

- Ensure a standardised framework and timeline is followed by all researchers.
- Pilot materials ahead of full audit launch.
- Capture as much data as possible to refer back to (screenshots).
- Build in time to review researcher observations against screenshots.



### Improvements to method

- Endeavour for researcher demographics to be varied to capture greater range of experiences.
- Investigate automation options where possible to reduce data collection time.
- Complement findings with user observations from consumers from the general public and observe how they interact on the sites.

## Next steps

# We will gather feedback on our findings, develop policy recommendations, and scope field trial proposals



*We warmly welcome your feedback on the findings and proposed next steps*



# THE BEHAVIOURAL INSIGHTS TEAM

## Get in touch:

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**Chiara Cappellini**, Research Advisor

# Appendix

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THE  
BEHAVIOURAL  
INSIGHTS  
TEAM

### List of operators audited

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1. 888
2. Betfair
3. Betfred
4. Betway
5. Coral
6. Ladbrokes
7. Paddy Power
8. SkyBet
9. Tombola
10. William Hill/ William Hill Vegas

#### Note on operators included:

- The list of top UK operators was sourced from [YouGov](#) in November 2021 and excluded all lottery operators.
- We were unable to collect information on the direct communications from SkyBet and Tombola (aside from initial welcome emails due to Skybet being a pilot operator, and accidental unsubscription to Tombola communications).
- We originally selected bet365 as one of the top operators for inclusion for auditing. However, due to technical issues accessing the site we had to remove them from our sample. bet365 appeared to have security controls which interacted with our own company's internet security settings, effectively blocking access to certain areas of the site. It was not possible to rectify this within the project timeline. We did collect some data for the operator but did not include in the analysis as it would not be a fully representative view of the operator's site.

#### Note on screenshots used:

In this deck we selected screenshots that most clearly demonstrate our findings. The number of screenshots for each operator is not representative of which operator has more features that might cause harm.

# Methodology at each stage

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### Landing page:

We reviewed the landing page of operator websites and app homepage, focusing on design features around:

- **Adverts/offers**
- **Sign up information**
- **Range of bets and games on offer**
- **Gambling management information**
- **Gambling harm**

### Sign up process:

We signed up for each operator account focusing on design features around:

- **Information required to sign up**
- **The sign up process**
- **Any promotions shared**
- **Gambling management information**
- **Gambling harm**

# Methodology at each stage

---

### Gambling management information:

We audited the gambling management information, which was often found on a page or a few pages that related to operator tools available for gambling management. We mainly focused on:

- **Accessibility and ease of finding gambling management information.**
- **How the gambling management information was presented**
- **The range of tools available**
- **Warnings of gambling harm**

### Betting experience:

We looked out for specific features of the betting process including:

- **The process to place a bet (including the design of the interface)**
- **Presence or absence of certain features (prompts to bet, gambling management prompts)**
- **Information updates after a bet was placed**

# Methodology at each stage

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### Gaming:

We looked out for specific features of the gaming process including:

- **The gaming interface (e.g. the presence of clocks, account balance, net loss, colour & sound)**
- **Information updates during the game regarding winning or losing a round**
- **Gambling management information**

### Betting experience:

We set up the most common tools, such as deposit limits, reality checks, time outs and self exclusion mainly focusing on:

- **The ease of setting up gambling management tools**
- **Features that could discourage the customer from setting up tools**

# Methodology at each stage

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### Withdrawal and closure:

We unsubscribed from communication, withdrew their remaining funds and tried to close our account. We focused on:

- **The ease of unsubscribing, withdrawing funds and account closure**
- **Friction around all the steps**

### Direct communications

Throughout the audit, we recorded all communications we received from the operators, including emails (for 8 operators), app notifications (for 3 operators) and text messages. We focused on:

- **The purpose of the comms**
- **Frequency**
- **Features used**