Behavioural Audit of Gambling Management Tools
Results Deck

March 2024

THE **BEHAVIOURAL INSIGHTS TEAM**

THE **GAMBLING POLICY & RESEARCH UNIT**

Contents

Executive Summary

BIT's Gambling Policy & Research Unit conducted a behavioural risk audit of the user journey and design of gambling management tools between September 2023 and February 2024. The aim was to identify relevant barriers and enablers to engagement with tools, and to provide recommendations for how to improve tool uptake.

Key Findings

1. **Tool design and offering was inconsistent across operators**. Operators offered different sets of tools, and their functionalities (e.g. regular vs net deposit limits) and designs (e.g. drop down menus vs free text boxes) often differed too.

2. **Gambling management information was hard to find on some platforms**. The design and placement of links to gambling management pages were inconsistent across operators: some were salient, but others lacked contrast, were small and located at the bottom of the home page. Accessing tool-specific pages involved several steps.

3. **Tool designs often included barriers preventing users from taking up or effectively engaging with the tool.** For example, tool pages were text-heavy and operators offered high limit options. Some operators used better designs, such as grouping tools visually.

4. Most operators **did not send any communications about gambling management**, and users did not receive reminders when approaching set limits.

5. Language used on gambling management and tool pages often **focused on users' individual responsibility rather than operators'** in supporting healthy gambling.

Recommendations

Operators should provide a consistent tool offer. Beyond mandatory tools, operators should make their offer of additional tools consistent with that of other operators.

Operators should reduce barriers in finding and effectively engaging with gambling management information and tools. This includes making information and tools easier to find, and designing tools to allow users to make informed choices.

Operators should communicate gambling management information proactively. This includes potentially sending new users a "safer gambling email" and sending reminders when users approach their limits.

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Background

The current online choice architecture of gambling operators may prevent users from engaging with and setting up gambling management tools

Traditional player centric tools allow users to set financial and time-based limits on operator sites to help them stay in control while gambling.[1] However, research shows that uptake of tools is low: **financial limits** are **used by only 11%** of people who gamble online, and even fewer make use of other tools like **time outs (5%)** or **reality checks (6%)**. This suggests that the current offering of tools might not be serving the needs of the gambling population, and that their current designs need improvement.

Two points from the Gambling Commission (GC)'s White Paper informed this piece of research:

Empowered customers: the White Paper lays out that "*[...] gamblers should be informed consumers who are supported to make considered purchasing decisions, and then empowered to manage their own spending through player-centric controls.*".

Safer by design: the White Paper lays out that "*Behavioural barriers and friction should only be used to keep customers safe rather than impede them from taking decisions.*" It specifies that "*Activities such as withdrawing winnings, closing accounts and accessing important information should be made as frictionless as possible.*"

The aim of this project was to conduct a behavioural risk audit of the user journey and design of gambling management tools, to identify relevant barriers and enablers to engagement with tools, and to provide recommendations for how tool uptake can be improved.

[1] See Ladouceur, R., Blaszczynski, A., & Lalande, D. R. (2012). Pre-commitment in gambling: A review of the empirical evidence. *International Gambling Studies, 12*(2), 215-230.; Delfabbro, P. H., & King, D. L. (2021). The value of voluntary vs. mandatory responsible gambling limit-setting systems: A review of the evidence. *International Gambling Studies, 21*(2), 255-271.; Gainsbury, S. M., Angus, D. J., Procter, L., & Blaszczynski, A. (2020). Use of consumer protection tools on internet gambling sites: Customer perceptions, motivators, and barriers to use. *Journal of Gambling Studies, 36*(1), 259-276.

Behavioural audits assess whether features in user journeys and designs of websites help users to make choices in their best interests

The way we behave online is influenced by the design and features of the websites and platforms we use. **Behavioural audits** assess whether the choice architecture of websites (such as their structure, design, and content) help users to make choices in their best interests in light of a certain goal (in this case gambling management through uptake of gambling management tools). BIT previously conducted a **behavioural audit of gambling operator websites**, exploring the user journey from arriving to an operator's site through to closing an account.

This audit built on our previous audit by:

Placing a **focus on access to gambling management information and tools**.

Providing recommendations on evidence-based ways to improve tool uptake and effective use.

This audit aimed to identify barriers and enablers to tool uptake through two focus areas:

User journey: We followed the process a (new) user follows aiming to find, set up, and engage with tools.

Design of tools: We reviewed how the design of gambling management tools influences the behaviour of users towards use of tools.

This audit focused on the following research questions:
1. When and how are tools currently introduced and how can that timing and framing be shifted to increase their uptake and effective use?
2. What are the current designs of tools, and how can they be optimised to increase their uptake and effective use?
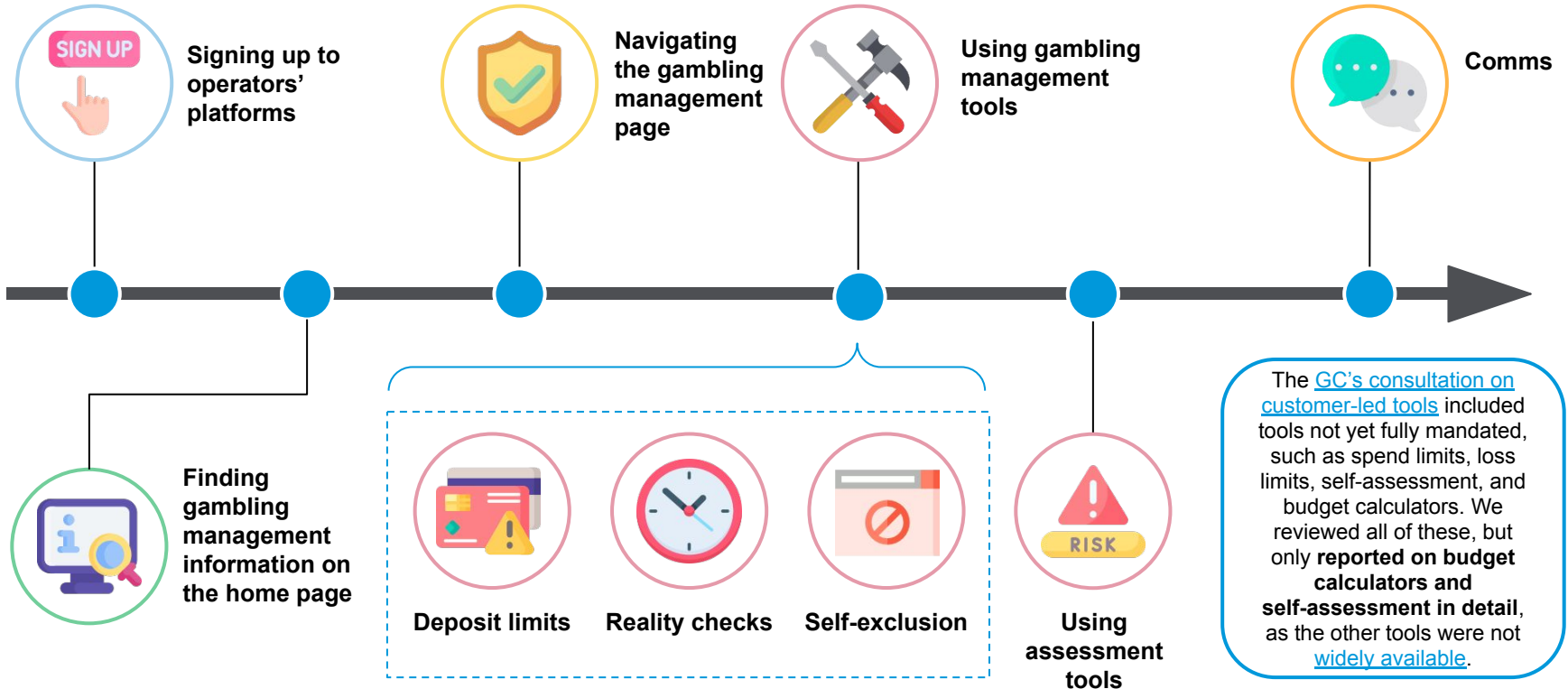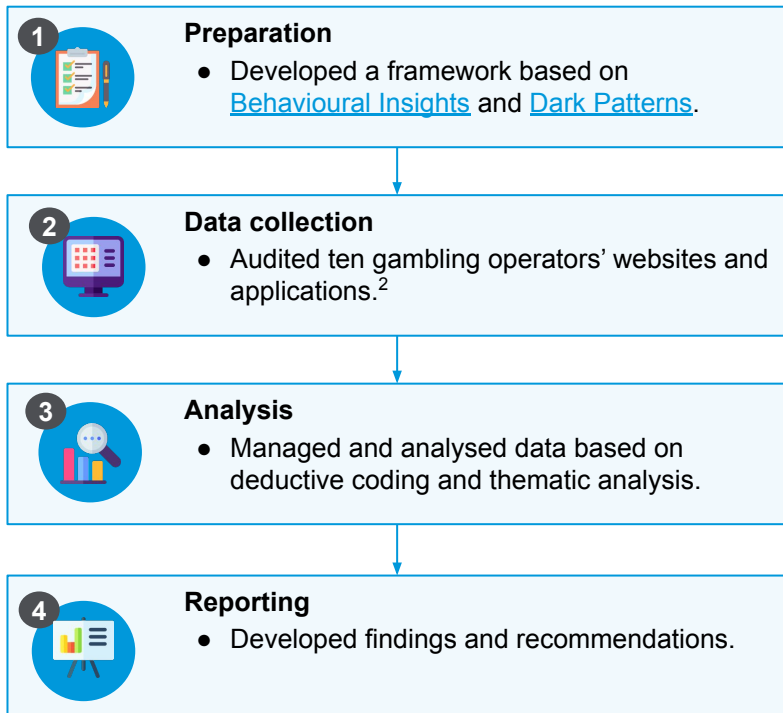
Overview of Methodology

This audit followed the user journey of sign-up, locating gambling management information, using gambling management tools, and receiving communications

Signing up to operators' platforms

Navigating the gambling management page

Using gambling management tools

Comms

Finding gambling management information on the home page

Deposit limits

Reality checks

Self-exclusion

Using assessment tools

The GC's consultation on customer-led tools included tools not yet fully mandated, such as spend limits, loss limits, self-assessment, and budget calculators. We reviewed all of these, but only **reported on budget calculators and self-assessment in detail**, as the other tools were not widely available.

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We used a multi-step methodology[1] to analyse barriers and enablers in the user journey and design of gambling management tools

1 **Preparation**
- Developed a framework based on Behavioural Insights and Dark Patterns.

2 **Data collection**
- Audited ten gambling operators' websites and applications.[2]

3 **Analysis**
- Managed and analysed data based on deductive coding and thematic analysis.

4 **Reporting**
- Developed findings and recommendations.

Our analysis focused on the three main categories of gambling management tools:

Financial tools: limit or provide information on the amount of money a user can spend with a certain operator.

Time-based tools: limit or provide information on the amount of time a user has spent with certain gambling activities.

Exclusion-based tools: allow a user to block access to certain operators (to specific games, or the operator and family brands entirely).

Within each category, we focused on mandatory tools as they were offered by the highest number of operators and thus allowed for meaningful comparison:

Deposit limits: are the most widely offered financial tool in line with the GC's Remote Technical Standards (RTS 12).[3]

Reality checks: are mandatory for remote gambling under the GC's Time Requirements and Reality Checks (RTS 13).

Self-exclusion: all online gambling operators must participate in the multi-operator self-exclusion scheme GAMSTOP.

[1] Full details of our methodology can be found in Appendix 1.
[2] Data was collected between October 2023 and early January 2024.
[3] Operators are required to offer either a deposit limit, loss limit, or spend limit.

Behavioural audits allow us to systematically identify relevant barriers and enablers to tool uptake. However, this methodology also has limitations, which we mitigated.

Limitations & mitigations:

➔ Working with researchers from similar demographic backgrounds (and without lived experience of gambling-related harms) could result in a one-sided approach to data collection, management, and analysis, with researchers potentially missing important findings.
We designed standardised data collection, management, and analysis frameworks, and conducted data collection through a Google Form with specified analysis rules to reduce the influence of researchers' background.

➔ We conducted a second round of data collection after having analysed our first set of data, following the Gambling Commission's release of their consultation on customer-led tools. Integrating these two sets of data could have resulted in inconsistencies in analysis.
The same researchers conducted data collection using the same protocols as in the first round.

➔ Our sample included the 10 most popular gambling operators in the UK. However, practices among smaller operators might differ from the larger ones we analysed.
We acknowledge that our findings cannot be generalised beyond the analysed sample.

➔ Our Behavioural Audit did not analyse all tools we found in depth and instead focused on a selection of tools.
We justified our reasons for focusing on specific tools and specified that our findings should not be generalised beyond the scope of this research.
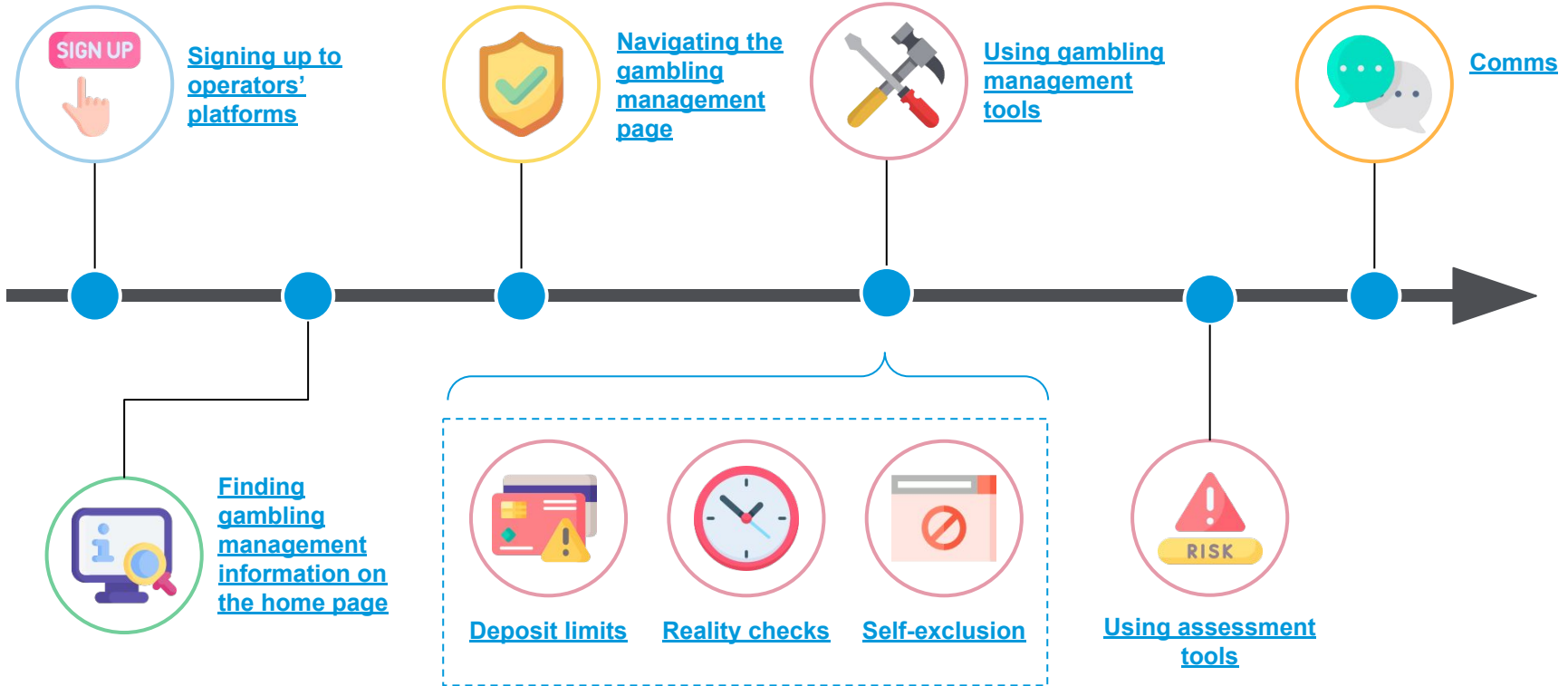
Findings

The findings follow the user journey of sign-up, locating gambling management information, using gambling management tools, and receiving communications
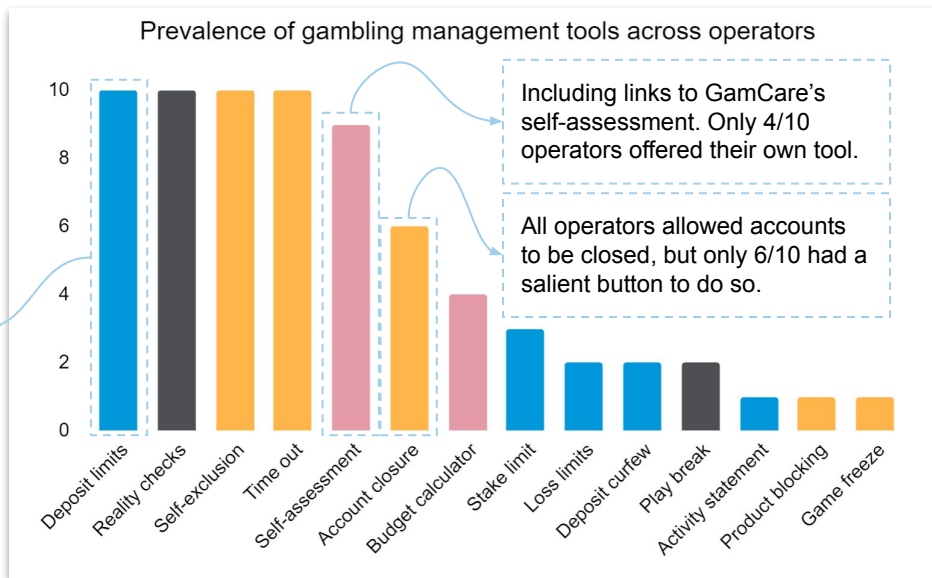
Signing up to operators' platforms

Navigating the gambling management page

Using gambling management tools

Comms

Finding gambling management information on the home page

Deposit limits

Reality checks

Self-exclusion

Using assessment tools

We collected data on a range of financial, time-based and exclusion-based tools across ten operators. Operators offered few non-mandatory tools.

The most frequently offered tools were **deposit limits**, **reality checks**, **self-exclusion,** and **time outs.** We focused our detailed review on mandatory tools* (deposit limits, reality checks, and self-exclusion), but also captured data on other available tools offered by operators. We also conducted analysis on assessment tools offered.

Including both regular deposit limits and net limits. Following recent changes, 4/10 operators offered regular deposit limits only, 3/10 operators offered net limits only, and 3/10 operators offered both.

Prevalence of gambling management tools across operators

Including links to GamCare's self-assessment. Only 4/10 operators offered their own tool.

All operators allowed accounts to be closed, but only 6/10 had a salient button to do so.

■ Financial tools

■ Time-based tools

■ Exclusion-based tools

■ Assessment-based tools

*Mandatory tools in accordance with LCCP 3.3.1. include: (a) tools to help monitor or control duration or amount of money that can be spent (e.g. deposit limits), (b) timers or other forms of reminders (e.g. reality checks), (c) self-exclusion options and (d) information about the availability of further help or advice.

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Signing up to operators' platforms

SIGN UP

All operators offered optional deposit limits during sign-up, but other tools were not introduced

I. All operators offered an optional **deposit limit** during the sign-up process or when the user first deposited money. However, the prompts to set a limit were **not always salient**, e.g., users saw simple links or buttons instead of popups, and other tools were not introduced at this stage. As the sign-up page is the first point of contact with the customer, this is a **missed opportunity** to prevent harm at the earliest stage.

Risks to effective engagement with tools

Simple links to deposit limits with muted colours are harder to notice than pop ups or colourful buttons. Users are unlikely to click on hidden links whilst they are setting up their account.

Set up a deposit limit now or later in your account.

you can set limits at any time in the gambling controls section of your account

NO, MAYBE LATER   YES, SET LIMIT NOW

Image 1: Captured from Ladbrokes website

Recommendations

✅ **Default** users into setting up mandatory tools upon sign-up, with an **option to opt out** by deselecting those they do not want to use. There is strong evidence that defaults have an impact on consumer choices.

✅ **Apply automatic limits to the accounts of young users.** One operator set a spend limit for all new users under the age of 25, and we encourage others to adopt this good practice.

✅ Evidence available to support implementation

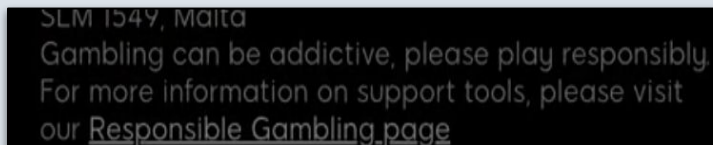🧪 Recommendation to be implemented and tested

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Finding gambling management information on the home page

Hidden buttons made it difficult to locate gambling management pages

I. All operators had a **button or link that navigated users from the home page to the gambling management page**, but on 3/10 websites, these were **less salient** than other buttons, such as those directing to games, or were not visible before scrolling to the bottom of the landing page.

Risks to effective engagement with tools

Salient elements on websites draw users' attention. Buttons to the gambling management page are not salient if they are small, located at the bottom of the page, or their colours do not contrast with the background. These characteristics make users less likely to find and click on them.

SLM 1549, Malta
Gambling can be addictive, please play responsibly.
For more information on support tools, please visit
our Responsible Gambling page

Image 2: Captured from 888 website

The link to the gambling management page was located at the bottom of this home page, using colours with low contrast and small fonts.

Recommendations

✅ **Add salient buttons that link to the gambling management page**. This would enable users to quickly find and engage with gambling management information. We recommend that the buttons use contrasting colours, are at least as large as other buttons on the home page, and are positioned where they can be found without scrolling, such as the top header.
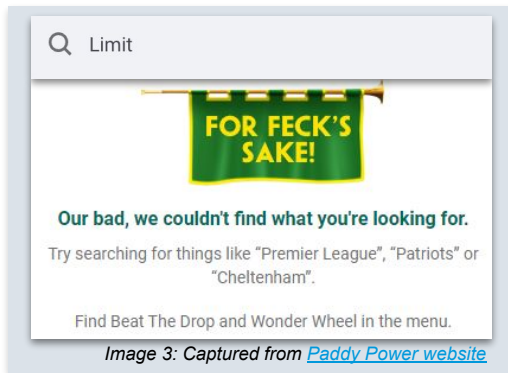
✅ Evidence available to support implementation

🧪 Recommendation to be implemented and tested

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Search bars did not find or show gambling management information

II. 9/10 operators did not have a **permanent direct link** from the home page to the tool setup page, and 9/10 operators did not have a **search bar that could find gambling management tools** or relevant information when we searched "Limit".

Recommendations

✅ **Improve search bars** so that they help users locate relevant tools when searching for terms such as "limit" or "budget". We recommend that operators identify other search terms indicating interest in gambling management tools, and ensure that searching these terms lead to relevant hits.

✅ **Include direct links to individual tool setup pages** on the home page, not just to the gambling management page.

Risks to effective engagement with tools

- If gambling management information and tools are difficult to locate, users are less likely to engage with them.
- Search bars suggesting to look up betting-related terms actively encourage users to gamble, even if they are at the risk of experiencing harm.

🔍 Limit

FOR FECK'S SAKE!

Our bad, we couldn't find what you're looking for.

Try searching for things like "Premier League", "Patriots" or "Cheltenham".

Find Beat The Drop and Wonder Wheel in the menu.

Image 3: Captured from Paddy Power website

No results after searching "Limit" on the home page. Instead, users were advised to search for sports terms.

✅ Evidence available to support implementation

🧪 Recommendation to be implemented and tested

Navigating the gambling management page

Gambling management pages contained promotions, offers, and other references to gambling

I. We found visually attractive **references to gambling**, e.g. promotions, game icons and betting slips, **on 4/10 gambling management pages**. They were visible in the background, in sidebars or as pop-ups on the gambling management page.

Risks to effective engagement with tools

Users who are at a higher risk of experiencing gambling harm are [more likely to be distracted by gambling-related cues](). Therefore, they may be disproportionately affected by seeing these elements on the gambling management page. This can result in failing to set up a tool they intended to.
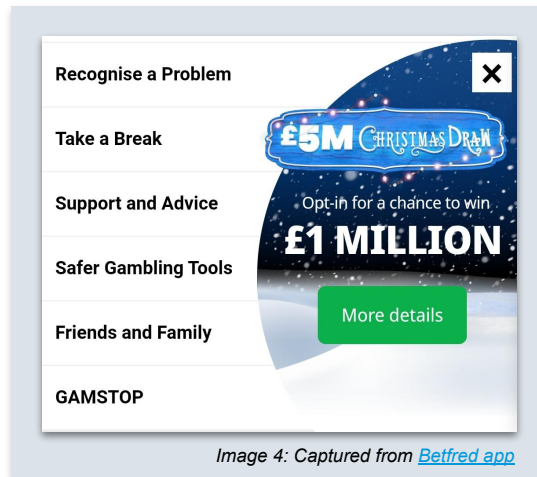
Image 4: Captured from [Betfred app]()

Recommendations

✅ **Ensure that users cannot see any promotions or offers whilst reading about gambling management or setting up tools**, for example, by making gambling management pages full screen or blurring out the background.

✅ **Evidence available to support implementation**

🧪 **Recommendation to be implemented and tested**

# Gambling management pages were text-heavy and had bland design choices compared to the home page

II. 5/10 gambling management pages were **more text-heavy and used fewer appealing and engaging visual elements** (e.g. contrasting colours or icons) than the rest of the website.

> *Risks to effective engagement with tools*
>
> Long and complex texts without visual aids can lead to information overload. This creates difficulties in processing information and makes it challenging for users to concentrate on the content and make well-informed decisions.

Deposit Limits

Research shows that the risk of problem gambling may be reduced if customers decide in advance how much money they want to commit to play. We openly encourage you to set a deposit limit to manage the amount of money that you can deposit into your account. Limits can be set for a 24 hour, 7 day or 30 day period and cannot be overridden.
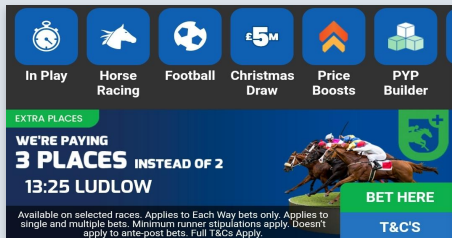
Images 5 and 6: Captured from Betfred app

The deposit limit description was text-heavy and used complex language, while the same operator's home page had colourful visuals and short descriptions.
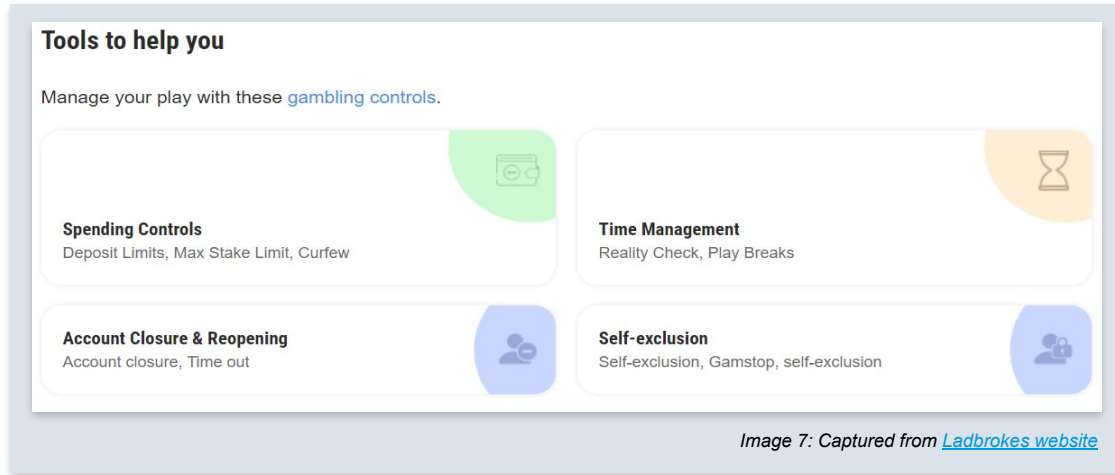
Recommendations

✅ **Use short sentences and visuals,** and **group information and tools** in order to simplify tool choice and reduce information overload. Ensure that direct links to individual tool pages are included within the groups.

See the next slide for a good practice example.

✅ **Evidence available to support implementation**

🧪 **Recommendation to be implemented and tested**

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Good practice example: Design features that help information processing on gambling management pages

Tools to help you

Manage your play with these gambling controls.

Spending Controls
Deposit Limits, Max Stake Limit, Curfew

Time Management
Reality Check, Play Breaks

Account Closure & Reopening
Account closure, Time out

Self-exclusion
Self-exclusion, Gamstop, self-exclusion

Image 7: Captured from Ladbrokes website

We believe that including visual elements, short sentences, and intuitive grouping makes the gambling management pages more engaging and easier to navigate.

✅ *Use of visuals and salient titles*

✅ *Grouping information and tools*

Navigating from the gambling management page to tool setup pages often involved friction

III. **3/10 operators'** gambling management pages did not have a direct link or button to tool setup, and these buttons were not salient on three other operators' platforms. When there was no direct link, navigating to tool setup often included **multiple steps without a clear benefit** or goal, such as confirming tool selection.

Risks to effective engagement with tools

Adding extra steps to the navigation process causes friction and reduces the likelihood that the user successfully navigates to the tool setup page.

Profit & Loss
Choose a time frame and see how much money you've won or lost for that period. 〉

Deposit Limit
Limit the amount you want to deposit, over 24 hours or up to 30 days. 〉

Image 8: Captured from Skybet website

Deposit Limits
Want to manage your spend? This tool lets you set a ⏽ to enjoy the excitement without going over your budg while decreases happen immediately.

Set A Deposit Limit

Image 9: Captured from Skybet website

Users first needed to click on this "Deposit Limit" button…

… and then on "Set A Deposit Limit" to get to the tool setup page.

Recommendations

✅ **Add clear Calls To Action** to the gambling management page. The buttons should be found at relevant places, such as below a tool description, have contrasting colours, and large size. Calls To Action can help users identify relevant next steps and take these steps without experiencing friction.

See the next slide for a good practice example.

✅ **Evidence available to support implementation**

🧪 **Recommendation to be implemented and tested**

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Good practice example: Salient Calls To Action and creative messages to promote the use of tools

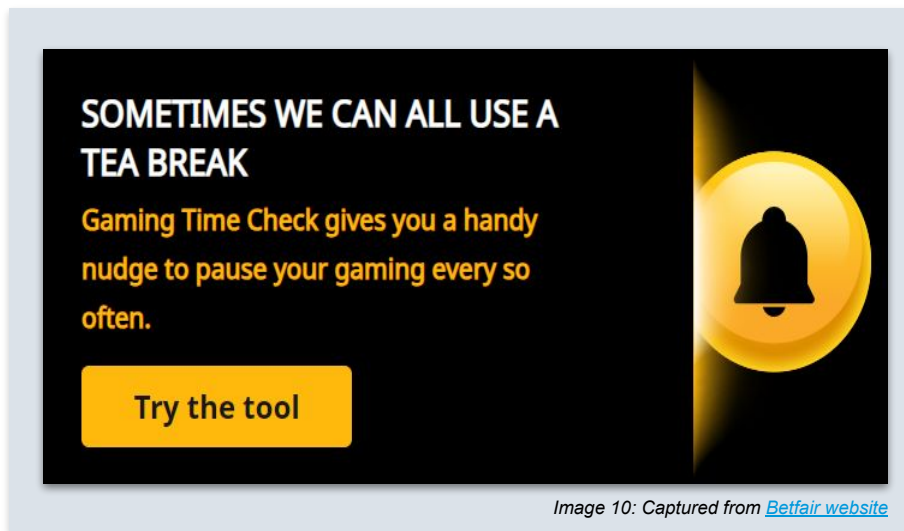

SOMETIMES WE CAN ALL USE A TEA BREAK

Gaming Time Check gives you a handy nudge to pause your gaming every so often.

Try the tool

Image 10: Captured from Betfair website

✅ *Salient and clear Call To Action*

Operators used language focused on individual responsibility

IV. Across operators, we found multiple examples of language use that **placed the responsibility on the individual to manage their own gambling behaviour** instead of acknowledging the **operator's duty of care**. These included statements such as "we ask that you only wager funds you can afford to lose" and "do you have a gambling problem?". A focus on individual responsibility was also present in the **lack of guidance on which tools users should use and when.** Users typically needed to determine this themselves.

> ### *Risks to effective engagement with tools*
>
> Using language that places the responsibility on the customer to manage their gambling behaviour might [result in stigma towards those experiencing gambling harm](). These phrases also fail to emphasise operators' duty to implement measures to prevent gambling harm.

> ⚙️ Online gaming is an exciting pastime for adults and at tombola we want the gaming experience to stay fun.
>
> We want you to stay in control and we ask that you only wager funds you can afford to lose - it's all about playing safely and staying in control!

Image 11: Captured from [Tombola website]()

Recommendations

✅ **Avoid framings that place the responsibility solely on the user.** Instead, demonstrate that the operator prioritises its duty of care by explaining how available tools can help.

🧪 **Test whether providing tool recommendations** on the signup page improves tool uptake. The recommendations should explain for whom certain tools are designed or when users should try them.

✅ Evidence available to support implementation

🧪 Recommendation to be implemented and tested

Using gambling management tools: deposit limit

limits the amount a customer can deposit into their account over a particular period

Users setting up deposit limits faced friction on 3/10 websites

I. We observed **extra steps in the process of setting up the tools** on 3/10 websites, such as needing to enter password or needing to confirm tool preferences.

> *Risks to effective engagement with tools*
>
> Adding extra steps to the tool setup process causes friction and reduces the likelihood that the user completes the intended actions.

Image 12: Captured from Bet365 website

Recommendations

✅ **Ensure that setting up a deposit limit is at least as easy as removing or editing it**. This can for example be achieved by making setup buttons easier to find, and removing extra steps from the setup process.

✅ Evidence available to support implementation

🧪 Recommendation to be implemented and tested

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Operators have begun to introduce a new deposit limit design with uncertain implications for users

II. Some operators have replaced their regular deposit limit with a net limit, taking withdrawals into account. 3/10 operators offered net deposit limits only and 3/10 operators offered both regular and net deposit limits.

Risks to effective engagement with tools

The net limits allow users to continue depositing after withdrawing winnings, which can lead to a higher total amount gambled. Furthermore, inconsistencies across operators in what the limits are called and how they work could lead to confusion and lack of transparency.
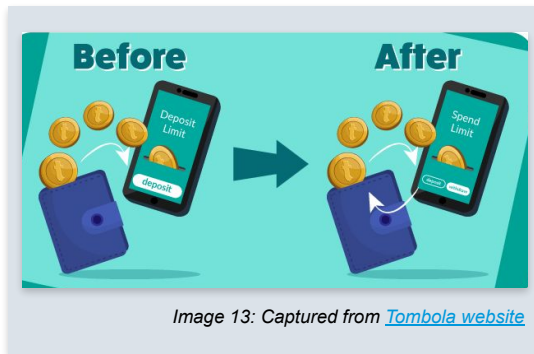

Image 13: Captured from Tombola website

Recommendations

✅ Ensure that **tool names and functionalities are clear and consistent** across operators.

🧪 **Compare the impact of different deposit limit designs** on comprehension of functionalities, uptake, and, among those at high risk of gambling harm, on gambling activity.

✅ **Evidence available to support implementation**

🧪 **Recommendation to be implemented and tested**

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Setup pages were missing clear information on how the tool works

III. 6/10 operators' setup page **did not provide a clear and short summary of how the tool works**. Accessing detailed information often required **leaving the setup page, searching for different web pages and reading long and complex texts.**

Risks to effective engagement with tools

Without short and simple summaries and clear headings, users might experience high cognitive load, making it difficult to make well-informed decisions.

Furthermore, having to leave the setup page to access information about a tool creates friction. Therefore, users will be less likely to understand how tools work.
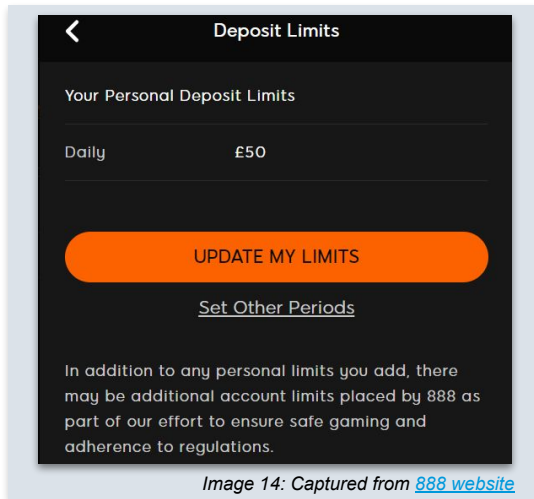

Deposit Limits

Your Personal Deposit Limits

Daily   £50

UPDATE MY LIMITS

Set Other Periods

In addition to any personal limits you add, there may be additional account limits placed by 888 as part of our effort to ensure safe gaming and adherence to regulations.

Image 14: Captured from 888 website

Recommendations

✅ **Add an easy-to-read, short text to the setup page about how the tool works**. **Signpost users to an FAQ-style page** with more detailed information about setting deposit limits, its benefits, and best practices, such as setting low limits and allowing oneself to "cool off" before increasing the limit.

See the next slide for a good practice example.

✅ Evidence available to support implementation

🧪 Recommendation to be implemented and tested

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Good practice example: Design features that help users quickly understand how the tool works

Clear, simple, and short description of what the tool does, what it applies to, and what timeframes are available.

Detailed information is made salient and is one click away.

Deposit Limit   ?

Control the amount you can deposit into your Sky Betting & Gaming account every day, week or month.

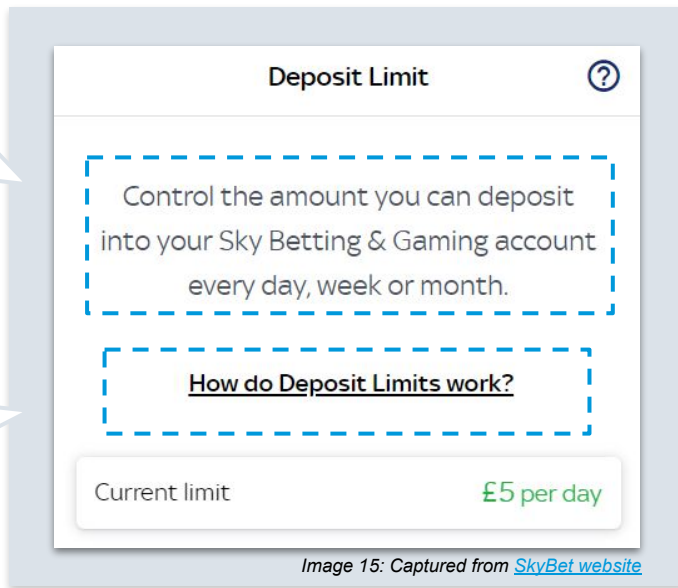How do Deposit Limits work?

Current limit   £5 per day

Image 15: Captured from SkyBet website

We believe this tool setup page design makes it easier to quickly understand how the tool works and to access detailed information.

Tool setup interfaces used anchors in drop-down lists and high maximum limits

IV. 9/10 operators had **unreasonably high maximum limits,** up to £10 million in free text boxes and up to £5000 in drop-down lists. 3/10 operators used drop-down lists and others had free text boxes.

Risks to effective engagement with tools

High limit options, especially in drop-down lists, act as anchors, prompting users to set higher limits than they may have set otherwise. A previous BIT randomised controlled experiment found that using lower anchors or free text boxes leads to a 45% reduction in the size of the deposit limit chosen by participants.

Image 16: Captured from Coral website

Image 17: Captured from SkyBet website

Recommendations

✅ **Use free-text boxes** (as previously tested by the Behavioural Insights Team) for tool setup to enable free choice and avoid anchoring through high values in drop-down lists.

✅ **Lower limit maximums and do not show them** unless users enter an invalid value to minimise anchoring effects.

✅ Evidence available to support implementation

🧪 Recommendation to be implemented and tested

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We observed limit defaults that anchor users to high values

V. 2/10 operators **used a high deposit limit or "no limit" as a default**. Users preferring lower limits had to change these pre-selected options before setup.

Risks to effective engagement with tools

Users often choose pre-selected options (e.g. to minimise effort, or perceiving them as "recommended" options), even if these options do not reflect their preferences. This is known as the default effect, which can ultimately lead to users depositing and gambling more money than they would have, had there been no limit default.

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lock limits in place for   24 hours

○ per day   ● per week   ○ per month

select a new limit   £   250

Enter new limit between £10 & £250

Set Spend Limit

Image 18: Captured from Tombola website

Recommendations

✓ **Remove high default limit amounts and timeframes** from tool setup pages.

✓ Evidence available to support implementation

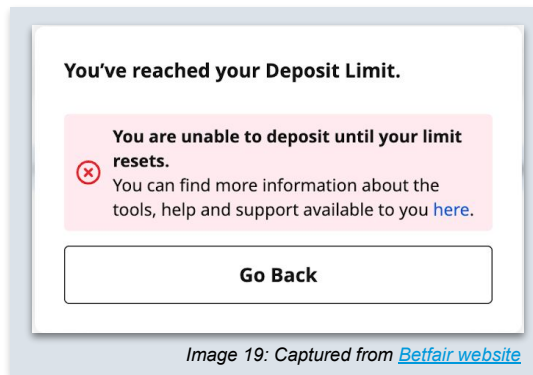🧪 Recommendation to be implemented and tested

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There was a lack of notifications or alerts as users approached their deposit limit

VI. No operator sent notifications as users approached a set deposit limit. We tested this by depositing approximately 90% of the set daily deposit limit. Warning messages only appeared when users tried to deposit more than their set limit.

Risks to effective engagement with tools

Research on gambling limits found that a warning message shown to users when they approach their deposit limit can help reduce subsequent spending.

Reminders about previously deposited amounts and how they compare to set limits can also help users track their gambling behaviour without increasing cognitive load.

You've reached your Deposit Limit.

❌ **You are unable to deposit until your limit resets.**
You can find more information about the tools, help and support available to you here.

Go Back

Image 19: Captured from Betfair website

Recommendations

🧪 **Introduce messages that warn users as they approach their deposit limit** and signpost to further tools and support. Test the impact of the messages' wording, timing, and channel on uptake of further tools and support, as well as on gambling behaviour.

✅ Evidence available to support implementation

🧪 Recommendation to be implemented and tested

Using gambling management tools: reality check

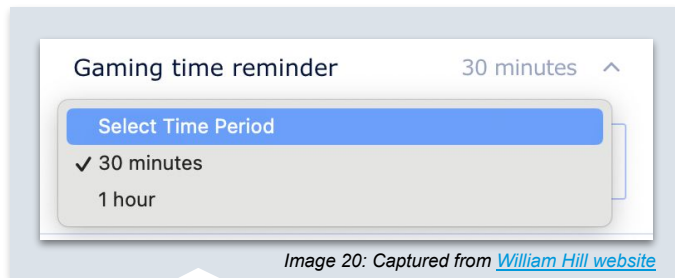*provides information on the amount of time a customer has spent gambling*

Reality checks offered a limited number of options in drop down lists

I. User choice was limited by **few available options**, as 6/10 reality checks had four or fewer available timeframes. The options ranged between 10 and 60 minutes with outliers of 3-4 hours, and often increased by intervals of 15 or 20 minutes.

Risks to effective engagement with tools

If the presented options do not align with users' expectations or preferences, or if users are anchored to longer time periods, they might need to select less frequent checks than intended or defer their choice and not set up a limit.

Gaming time reminder   30 minutes ⌃

Select Time Period

✓ 30 minutes

1 hour

Image 20: Captured from William Hill website

This reality check only offered two time frames to choose from, which might not align with user preferences.

Recommendations

🧪 **Test the impact of defaulting customer into seeing a reality check every 10 minutes,** and offering an option to delay or remove future reality checks (with options ranging from 10 to 60 minutes in intervals of 10 minutes).

✅ **Evidence available to support implementation**

🧪 **Recommendation to be implemented and tested**

35

Researchers could change and remove reality checks without a cooling-off period

II. There was no cooling-off period when researchers reduced the frequency of reality checks or removed them completely. Changes took place immediately when a new session started or after logging out and back in again, as opposed to the changes to financial limits, which normally required a 24-hour cooling-off period before taking effect.

Risks to effective engagement with tools

If users are in a <u>hot state</u>, when decisions are quick and influenced by emotions, they might increase the timeframe of reality checks or remove the tool entirely, resulting in a higher likelihood of harmful gambling.

Recommendations

✅ **Add cooling-off periods to reality checks**, which introduce friction to tool removal. **Ensure the cooling-off mechanisms and time frames are consistent** across tools in order to increase comprehension and transparency.

✅ Evidence available to support implementation

🧪 Recommendation to be implemented and tested

36

There was inconsistency across operators regarding which products reality checks applied to

III. **8/10 operators offered a reality check that only covered a selection of games, and applied per gaming session only**. Furthermore, **it was inconsistent which games and products these reality checks applied to.** In some cases, the tool applied to gaming products, while on other platforms, the tool applied to casino games. In one case, it was unclear which games or products the tool covered.

Risks to effective engagement with tools

If not all games are covered under a reality check, the tool is not as effective as it could be in helping customer manage their gambling behaviour.

Set a Gaming Time Reminder

Set an automated reminder letting you know how long you've been gaming for.
How does this work?

This is only available for gaming products. Please note that gaming products do not include sports, poker, virtual or free play tournament. To set a reminder for Evolution Gaming content, launch a game, choose "Settings" and then "Game Session Settings".

Image 22: Captured from William Hill website

Set a Reality Check

Set an interval-based reminder detailing the length of time you have been playing across Sky Bingo, Sky Casino, Sky Vegas and Sky Bet Games.

Image 23: Captured from SkyBet website

Recommendations

✅ **Ensure** that reality checks **apply at the account level, across all available products**, and communicate their scope clearly.

✅ **Evidence available to support implementation**

🧪 **Recommendation to be implemented and tested**

37

Using gambling management tools: self-exclusion

allows a customer to block access to specific games, the operator or entire family brands

⊘ Using gambling management tools: self-exclusion

Self-exclusion options and suggestions were not standardised across operators

I. The process of setting up self-exclusion and the presentation of options were inconsistent across operators. 8/10 operators had their own exclusion schemes, while the others offered self-exclusion via GAMSTOP only. Some operators offering both schemes presented GAMSTOP saliently, while others offered their own scheme first, mentioning GAMSTOP further down the page.

Risks to effective engagement with tools

If some operators present GAMSTOP only as an alternative to their own self-exclusion scheme without making this option salient, users wanting to self-exclude from all gambling platforms might fail to do so.

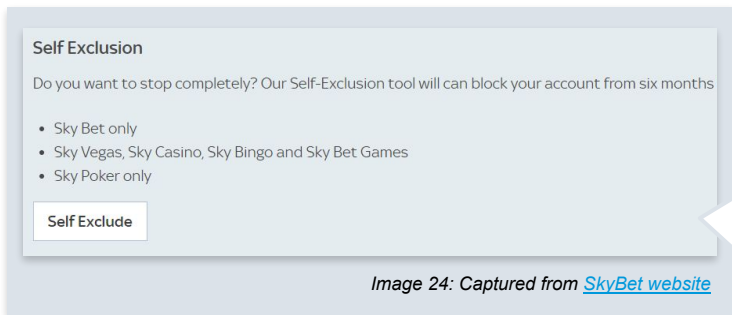
Self Exclusion

Do you want to stop completely? Our Self-Exclusion tool will can block your account from six months

- Sky Bet only
- Sky Vegas, Sky Casino, Sky Bingo and Sky Bet Games
- Sky Poker only

[Self Exclude]

Image 24: Captured from SkyBet website

On this gambling management page, GAMSTOP was not mentioned under the "Self Exclusion" heading, only towards the bottom of the page, among further tools.

Recommendations

✅ **Make links to GAMSTOP's self-exclusion scheme salient** on the gambling management page by using GAMSTOP's logo and clear Calls To Action.

✅ Evidence available to support implementation

🧪 Recommendation to be implemented and tested

Text-heavy self-exclusion pages created further friction

II. On 2/10 operators' platforms, **the self-exclusion setup page was text heavy** and did not include visual elements.

Risks to effective engagement with tools

Reading long texts without guidance or visual aids is cognitively taxing. If users face text-heavy pages, they are unlikely to read them. This can ultimately lead to uninformed decisions and lower uptake of the tool.

Self Exclusion Procedure

On request, Betfred.com will close any customer's account(s) for a minimum period of six months and for any period up to 5 years. During the agreed period of time the customer will not be able to place any bets nor will the customer be allowed to revoke the agreement. Betfred.com will remove the customer's name from our mailing and marketing lists and will do everything it can to prevent a new account from an excluded customer from being re-opened during the period of self-exclusion.

To self-exclude you can use the online facility below. Simply confirm you wish to self-exclude by selecting the check box, select the amount of time you wish to self-exclude yourself for and enter your password. Hit the 'Self-Exclude' button. You will receive an email as soon as your request has been processed.

Alternatively inform Betfred of your intentions in writing. You can do this by emailing us at **support@betfred.com**. When you email us please include your PF Number, account username, your full name and address as well as the period of time you would like to self-exclude for. Please note by sending an email you agree to the following terms and conditions:

Image 25: Captured from Betfred website

Users needed to read or scroll through a long text before setting up the tool

Recommendations

✅ **Reduce the complexity of text** on the tool setup page by shortening sentences, removing complicated words, and structuring information with sub-headers. **Add visual elements** that help illustrate how the tool works and what options users have.

✅ Evidence available to support implementation

🧪 Recommendation to be implemented and tested

40

Using assessment tools: budget calculators and self-assessment

allow a customer to assess their own gambling and make plans for management

Budget calculators and self-assessment tools did not provide personalised next steps

I. 6/10 operators did not offer budget calculators and 2/10 did not offer self-assessment questions. Four of those offering self-assessment did so on their own platform and others by signposting to GamCare. **None of these operators suggested specific, personalised next steps**. However, two budget calculators prompted users with a negative budget to ask for help, and three self-assessment tools displayed **generic advice** to all users, suggesting setting limits if they answered "yes" to self-assessment questions asking about harmful gambling habits.

Risks to effective engagement with tools

People are more likely to perceive messages as relevant and take action if they are personalised. If budgeting and self-assessment tools only display generic messages, they might not have an impact on tool uptake or gambling behaviour.
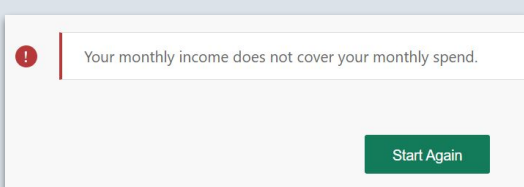

❗ Your monthly income does not cover your monthly spend.

Start Again

Image 26: Captured from Bet365 website

A user with a negative budget was not prompted to use financial tools or contact helplines.

Recommendations

🧪 Test whether offering **budget calculators and self-assessment questions** can **increase engagement with gambling management tools** by signposting users and providing specific next steps (e.g. which tools they could use).

✅ **Evidence available to support implementation**

🧪 **Recommendation to be implemented and tested**

Self-assessment questions were not standardised across operators

II. The self-assessment questions on operator platforms **were not standardised** and did not align with questionnaires developed by researchers, such as the Problem Gambling Severity Index (PGSI).

Risks to effective engagement with tools

- If self-assessment questions differ across operators, assessment results might not align, leading to confusion about appropriate next steps.
- If the wording does not follow standard questionnaires, they might include harmful elements, such as putting the blame on the individual.

Operators asked different questions on the self-assessment page, leading to confusion and unreliable assessment. Title questions were putting the blame on the individual, increasing the risk of stigmatisation.

Do you have a gambling problem? Ask yourself the following questions:

1. Do you feel guilty about the amount of money you spend gambling?
2. Do you need to gamble with larger amounts of money to get the same feeling of excitement?

Image 27: Captured from Bet365 website

Do you have a gambling problem?
- Do you stay away from work or college to gamble?
- Do you gamble to escape from a boring or unhappy life?

Image 28: Captured from Tombola website

Recommendations

✅ **Standardise self-assessments** through integrating industry standard tools in operators' platforms, e.g. the GamCare self assessment tool or PGSI questions.

Some operators already signpost to GamCare's tool, but we also recommend increasing the tool's salience and its full integration into the operator website.

✅ Evidence available to support implementation

🧪 Recommendation to be implemented and tested

Communications

There was limited information about gambling management tools in communications sent to users

I. 7/10 of the operators **did not send out communications about "safer gambling"** and available gambling management tools and support to users during the period this study was conducted. Furthermore, **none of the operators prompted users to explore further tools** once one has been set.

Risks to effective engagement with tools

Users might be more likely to open and read the first emails they receive from an operator. Furthermore, users might be more receptive to messages about tools after setting up a deposit limit during the signup process.

Therefore, the lack of emails encouraging the use of gambling management tools is a missed opportunity to inform users about available tools when they have not yet developed harmful habits and are more likely to engage with the messages.

Recommendations

✅ Send out a "**safer gambling email"** to all new users.

✅ **Signpost** to gambling management tools and support organisations in all communications.

🧪 Test the **optimal timing** of **prompting users to set further tools**, such as after setting a deposit limit or at the end of gaming sessions.

✅ **Evidence available to support implementation**

🧪 **Recommendation to be implemented and tested**

Messages shifted responsibility to the individual and did not acknowledge difficulties

II. Those operators that showed "safer gambling" messages in their emails often emphasised the **responsibility of the individual** to stay in control, and **portrayed gambling as risk-free and exciting**, without acknowledging that staying within one's limits can be difficult.

> *Risks to effective engagement with tools*
>
> Research with individuals engaged in gambling has found that there's an agreement across demographic groups that messages should not blame individuals and should avoid patronising language. Messages that focus on individual responsibility can stigmatise those experiencing gambling harm.
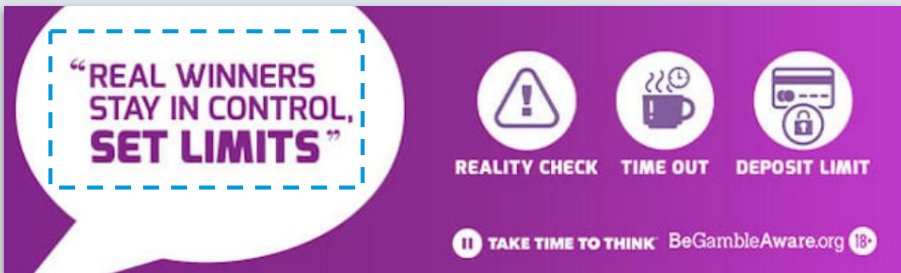

Image 29: Captured from Betfred email communications

Recommendations

✅ **Frame "safer gambling" messages around how gambling management tools can benefit users and avoid stigmatising language.** For example, messages should highlight that tools help stay within limits when it is difficult to do so, but **refrain from depicting gambling harm or failure to gamble safely as a result of weakness or error of the individual.**

✅ Evidence available to support implementation

🧪 Recommendation to be implemented and tested

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Summary of Recommendations

Operators can take immediate steps to increase effective engagement with tools, while they can test potentially innovative recommendations

Recommendations to implement
We believe these should be implemented immediately

Provide a consistent tool offer. Beyond mandatory tools, operators should make their offer of additional tools consistent with that of other operators.

Reduce barriers in finding and effectively engaging with gambling management information and tools. This includes making information and tools easier to find (e.g. by reducing the number of clicks involved in the process or making links more salient), and designing tools to allow users to make informed choices (e.g. by removing high defaults and providing guidance on when to use tools).

Communicate gambling management information proactively. This includes potentially sending new users a "safer gambling email" and sending reminders when users approach their limits.

Recommendations to implement and test
We believe these benefit from testing

Test the impact of changes in tool structures on effective engagement with the tools. This could include the introduction of, or changes in, budget calculators and self-assessments, as well as regular vs net deposit limits.

Test optimal messaging, timing, and channel of gambling management communications. This includes limit reminders, as well as prompting users to set further tools.

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Appendix

Appendix 1:
Methodology and sample

We created a framework informed by behavioural insights and dark patterns research that allowed us to center our analysis around barriers and enablers

1

Preparation

- We **used our framework** to **design data collection questions** focusing on 1) capturing each stage of the user journey from sign up through to tool management, and 2) identifying specific design features in tools themselves.

- These questions were transferred into a Google Form, structured around the user journey of setting up, using, and disabling gambling management tools.

Concept used	Definition
Anchors	Reference points used when making decisions.
Choice overload	A reduction in decision making ability due to having too many choice options.
Defaults	An individual's tendency to stick with a pre-selected option when presented with a choice.
Framing	The way in which information is presented to a user.
Friction	Minor barriers which can make a task more effortful and may reduce the likelihood of a task being completed.
Salience	Tendency to focus on items or information that are more noteworthy while ignoring those that do not grab our attention.
Hidden information	Options or actions relevant to the user that are not made immediately or readily accessible.
Toying with emotion	Use of language, colour or style to evoke an emotional response.

We reviewed ten gambling operators' websites and apps, including direct communications

2

Data collection

- Our **Google Form standardised data collection** between three researchers.

- We followed a similar sampling strategy to our previous audit and selected our **sample of ten gambling operators** based on the most popular operators websites in the UK.

- Data collection comprised of researchers creating new accounts and gambling, reviewing the signup process, websites and apps of each operator, in line with questions in the form.

- We reviewed **websites, apps, and direct communications** received from operators. Our researchers were guided by previously agreed questions and took screenshots **of observations** to refer back to in later stages of the audit.

Section 7 of 12

Deposit Limit

Some things to think about for this stage: *How easy is it to set up the gambling management tool? What are different gambling management tools called and how do they work? How can you change/deactivate them after you set them up?*

Instructions for this stage:
- Stay logged into your account
- Navigate to the operator's informational or set-up page of this tool. All questions in this section relate to this page.
- Answer the questions in this section

The Google Form included several elements that allowed us to standardise data collection:

? **Open and closed prompt questions** directing focus of researchers

Detailed data collection rules and instructions, allowing for smoother data management and analysis.

We used qualitative analysis methods to manage our data and find main themes of barriers and enablers to tool uptake

3

Analysis

- We used a process of **deductive coding** to manage the data. Deductive coding involved applying existing theories or frameworks to new qualitative data. Given we were interested in barriers and enablers to uptake of tools, as well as specific design elements, we could predetermine our analysis categories.

- We then used **thematic analysis** to categorise our data further. The thematic analysis focused on pinpointing themes that emerge from qualitative data.

Main code categories of interest included:

Barriers and enablers to uptake of tools at each stage of the user journey

Features in the designs of gambling management tools that prevented or enabled the uptake of tools

As part of the thematic analysis, we managed our data, organised it by the specific website features we observed, and included information on:

Whether a feature **prevented or encouraged tool uptake**

The **number of operators** displaying each feature

Whether evidence existed for each features potential risks to effective tool engagement

We audited the websites of 10 of the most popular operator brands in the UK.

Sampling approach

- As in our previous behavioural risk audit, we based our sample on the 10 most popular operators brands in the UK, initially excluding lottery, bingo, and scratchcard sites.

- Our analysis of their websites and applications allowed for a similar sample, meaning our findings could be compared across time and we could track changes for specific operators.

Final sample

1. Coral
2. Ladbrokes
3. Paddy Power
4. Betfair
5. Tombola
6. Bet365
7. 888 Sport
8. William Hill
9. SkyBet
10. Betfred