

Behavioural risk audit of scratchcards and instant win gambling games

GPRU 2025



BIT is a global research and innovation consultancy that combines a deep understanding of human behaviour with evidence-led problem solving to improve people's lives.

We work with all levels of government, nonprofits and the private sector, applying behaviour science expertise with robust evaluation and data to help clients achieve their goals.

The report is produced by the Gambling Policy and Research Unit (GPRU) within BIT.

GPRU is a multi-year programme, running from 2021-2025, that aims to discover, test and scale ways to minimise gambling harm across Great Britain. Our work is funded through a [regulatory settlement fund](#) via the Gambling Commission, the UK's gambling regulator.

Find out more at [bi.team](#)

If you'd like this publication in an alternative format such as Braille or large print, please contact us at: info@bi.team

Authors:

Eleanor Collerton, Andreea Faluvegi, Laurence Fenn, Craig Johnson, Cindia Li, Ruth Persian

Contents

1. [Executive summary](#)
2. [Introduction](#)
3. [Methodology](#)
4. [Findings](#)
 - a. [Gambling games and promotions](#)
 - b. [Information provided](#)
 - c. [Gameplay](#)
5. [Summary of recommendations](#)
6. [Appendix](#)

Glossary of terms

- **Gambling Commission:** The Gambling Commission is the regulator for gambling in Great Britain.
- **Games / gambling games:** When we use the term games in this context, we mean gambling games - that is, games offered by gambling operators where consumers place bets or stakes with a goal to win money or prizes.
 - **Instant win games:** A class of games of chance that provide players with immediate knowledge of the outcome upon participation, typically without requiring extended gameplay or decision-making.
 - **Online Scratchcards:** A digital version of a physical scratchcard lottery ticket that offers players an immediate result through virtual revelation of hidden symbols or numbers.
 - **Slot game:** A casino game of a reel-based type (includes games that have non-traditional reels).
- **Gambling operator:** A company or entity that provides and manages gambling services and activities, such as casinos, online gaming sites, and betting shops
- **Odds:** A number that describes the chance of an outcome happening.
- **Remote Technical Standards (RTS):** A set of regulatory requirements issued by the [Gambling Commission](#) specifying the minimum technical and consumer protection standards that must be met by remote (online) gambling operators and software providers to ensure fairness, transparency, and player safety.
- **Return to player (RTP):** Percentage odds are also known as 'return to player'. For example, an RTP of 93% means that over a long period of time gambling on, say, a slot machine, the customer may win, on average, 93 pence for every £1 spent.
- **Safer gambling:** Any guides, information and tools that share information about how to stay safe when gambling. This may include policies, practices, individual actions and interventions designed to minimise the risk and severity of gambling-related harms among individuals who gamble.

Executive summary

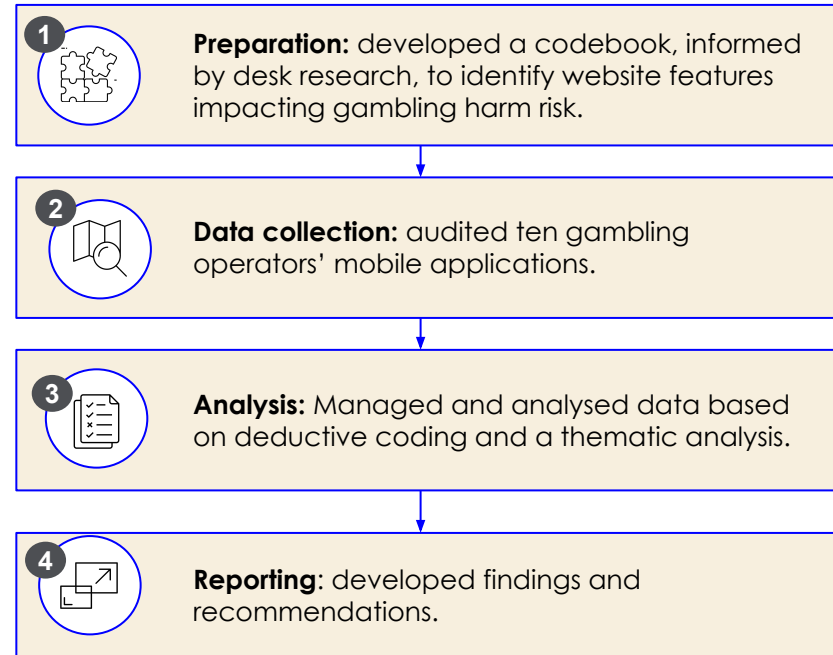


The behavioural risk audit examined features of instant win games and online scratchcards on gambling platforms

BIT's Gambling Policy & Research Unit conducted a **behavioural risk audit** to investigate how the design features of online scratchcards and instant win games vary across different operator platforms, and their potential impact on consumer behaviour. The areas of focus included game design, information provision and game promotion on platforms.

The research aligns with the Gambling Commission's Evidence Gaps and Priorities 2023–2026, particularly theme 5: product characteristics and risk, by offering insights into consumer journeys across multiple operators.

What is a behavioural risk audit? A behavioural risk audit involves systematically mapping online design practices and evaluating their potential impact on consumer behaviour and outcomes.



We identified four themes that point to opportunities for design improvements that can maximise harm reduction

Themes:

1. Safer gambling messaging was less salient than promotions and primarily focused on individual responsibility.
2. It was hard to gain accurate and complete information about how to play, potential wins, and chances.
3. The design of games and promotions encouraged gameplay whilst some discouraged exiting.
4. Slot games, instant win games, and scratchcards had similar structural features and gameplay experiences.

Recommendations:

1. Operators should ensure symmetry between the visibility of safer gambling content and promotional content. Regulation can consider minimum visibility standards to safer gambling information.
2. Further research should be conducted to understand how the location, salience and framing of game specific information impact consumers' understanding of it.
3. Further research could aim to understand the impact of free demos and how reduced gameplay friction may contribute to gambling-related harm.
4. Greater attention should be given from policymakers and industry to the design and presentation of online instant win games and scratchcards, particularly their categorisation, given the structural similarities identified with slot games.

Introduction



Background

BIT's Gambling Policy & Research Unit conducted an exploratory behavioural risk audit aiming to investigate features of instant win games and online scratchcards found on gambling operator platforms and how these compare to slot games. The features included the gambling games' design and mechanisms, product presentation, and advertising strategies. The project sought to map out the variety of different features and their impact on consumer behaviour.

Online Instant win games and scratchcards were compared with slot games across a range of gambling operators, to explore structural similarities and differences.

This research aligns with the Gambling Commission's Evidence Gaps and Priorities 2023–2026, specifically addressing evidence theme 5: product characteristics and risk. It provides a more comprehensive understanding of consumer experiences with instant win games and scratchcards across various gambling operators

Research question: How do the design features of online scratchcards and instant win games vary across different operator platforms, and what is their potential impact on consumer behaviour?

- How may these features contribute to an increased risk of consumers experiencing gambling-related harm?
- How may these design features help protect consumers and promote safer play?

Methodology



We audited the consumer journey for instant win games and scratchcards on UK gambling platforms



1 Desk research

Existing evidence was reviewed to better understand how design features on operator platforms, particularly those involving scratchcards and instant win games, may be associated with risks to consumers (see [Appendix 2](#)).

The aim was to identify which features, or categories of features, could contribute to increased or reduced risk of harm, in order to inform and shape the focus of data collection during the audit.

The output of this desk research was a codebook, which served as the data collection matrix (see [Appendix 3](#)).

2 Data collection

Pilot: To ensure the codebook's relevance and reliability, a pilot audit was conducted by two researchers.

Data collection: The final audit was conducted by three researchers using the updated codebook to assess gambling operators by following an intuitive consumer journey (see [Figure 1](#)). The team included researchers both under and over 25 years of age, allowing assessment of the extent to which recent slot game regulations applied to other types of games. All data were collected using mobile phones in April and May 2025.

Sample: A diverse sample of operators was chosen, representing a mix of traditional and newer operators offering casino games, lotteries, bingo, or betting, including the National Lottery (see [Appendix 4](#)).

3 Analysis

The data was managed and analysed using deductive coding and thematic analysis (see [Appendix 4](#)).

Figure 1. The typical consumer journey on an operator App from logging in to finishing and exiting a game



Findings



Gambling game promotions

This section includes information about how scratchcard and instant win games are promoted and framed on websites and in emails.

Game promotion - key findings



Gambling advertisements were generally more prominent than safer gambling messages. When safer gambling content did appear, it was often displayed briefly or was only visible at the end of a platform.



Safer gambling content did not convey the potential risk associated with gambling. There was a missed opportunity to educate customers about gambling risks and how to identify harm.



Instant win games were promoted as a quick way to win money. Additionally, lottery websites emphasised that certain forms of gambling, such as scratchcards, contributed to social causes and charitable initiatives.



Promotions frequently created a sense of urgency. They also highlighted winning examples, and encouraged people to play regularly or at specific times.

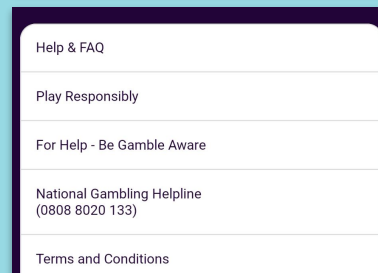
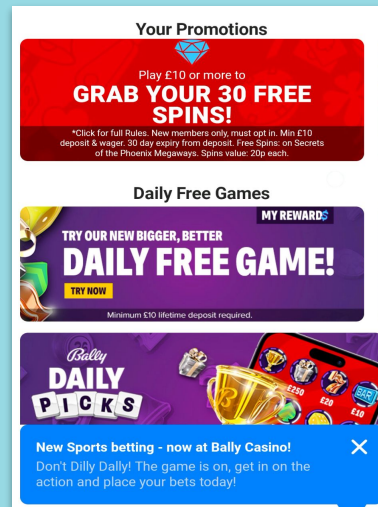
Gambling promotions were more visible than safer gambling content

Gambling promotions were highly visible, often appearing as eye-catching banners at the top of landing pages. Some operators also used private messages, full-screen pop-ups, and smaller in-game placements.

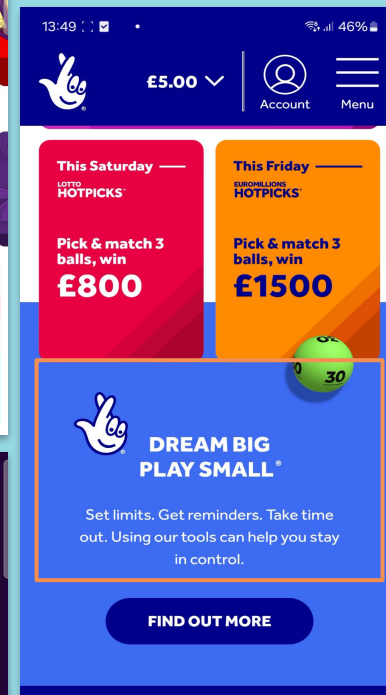
In contrast, safer gambling messages were less prominent, typically appearing as the last promotion on the top banner, displayed briefly for only a few seconds.

The National Lottery was the only operator to provide visible safer gambling information before the end of their main landing page. This included prompts to set limits, get reminders, and use safer gambling tools.

Why it is important: A high volume of gambling promotions, alongside a limited number of low-visibility safer gambling messages, may [distort consumers' perception of risk](#) and hinder their ability to make informed decisions about gambling.



Promotions on top of game selection page vs safer gambling content located at the bottom – Bally Casino



Visible safer gambling messages on the game selection page – The National Lottery

There was a lack of consistency in how safer gambling content was displayed

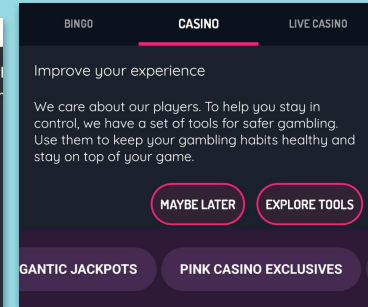
All operators, with the exception of the National Lottery, featured logos for multiple safer gambling organisations. The National Lottery, however, only included the GamStop logo. A few operators also provided the following:

- **Links to additional safer gambling information**, alongside information on regulation and measures taken to protect customer funds, at the bottom of their landing pages.
- **Visible messages at the top of the screen** urging consumers to set up safer gambling tools.
- **Icons leading to safer gambling content**, sometimes in the form of a shield icon at the top of the landing page. However, on other operator platforms, the same icon linked to general game information instead of safer gambling content.

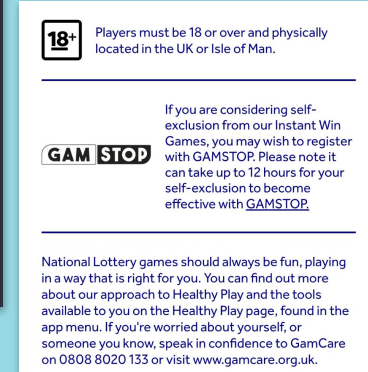
A lack of consistency and bottom-page positioning can make it hard for consumers to locate information about safer gambling messages.



Logos for safer gambling organisations at the bottom of page – Ladbrokes



Information on safer gambling tools on the game selection page – PinkCasino



Safer gambling information – National Lottery

[Theme 1 - Safer gambling](#)

Safer gambling promotions did not convey the potential risk associated with gambling

Prominent safer gambling slogans sometimes used framings that may promote gambling or place the responsibility on the individual. Examples included 'trusted around the world,' 'keep it foxy,' 'Dream big, play small,' and 'keep it fun.' In contrast, texts that offered practical safer gambling advice, such as setting limits, tended to be smaller.

Little to no information was provided on how to recognise the signs of gambling harm.

The National Lottery's main safer gambling messaging was limited to instant win games and predominantly focused on setting tools and self-exclusion.

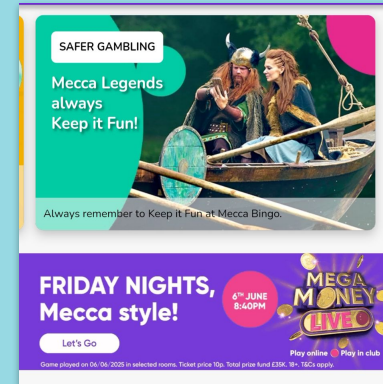
Why it is important: Safer gambling language that shifts responsibility to individuals, or make gambling seem harmless or fun, may [lead to more stigma for those experiencing harm](#) by implying that they failed to manage their personal responsibility.



Safer gambling message emphasising potential wins – The National Lottery



Safer gambling message building trust in the operator – Betano



Safer gambling message focused on keeping it fun – MeccaBingo

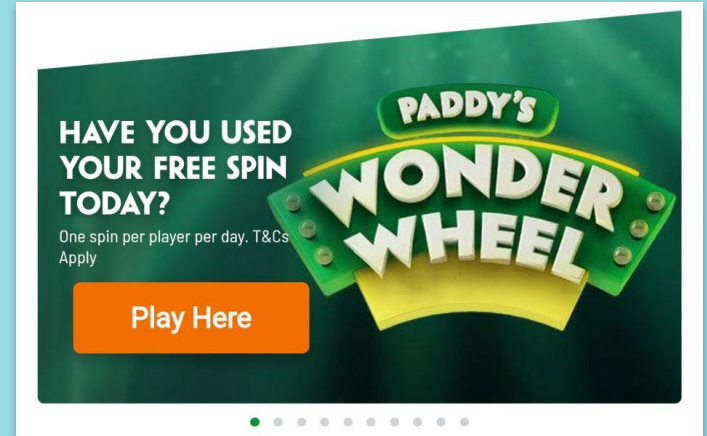
Promotions highlighted time sensitive offers

Promotions often used elements that created a sense of urgency, such as jackpot countdowns and prizes that could only be won during certain timeframes or on certain days.

To claim the offers, customers often needed to **deposit a certain amount of money and play** (i.e. to receive free spins or bonuses) or **return to the game daily**. Information about these conditions was sometimes presented in smaller text or was less prominent.

Promotions also used direct commands (e.g., 'dive in', 'walk into'), emotionally descriptive terms (e.g., 'thrill', 'show-stopping'), and metaphorical phrases (e.g., 'golden era', 'light up the Strip').

Why it is important: Prompts and language that leverage urgency and emotions [can reduce customers' ability to pause and carefully consider their choices](#), potentially leading to riskier bets and longer play.



Daily promotion – PaddyPower

Other promotions highlighted 'real wins' and positive social causes


Some operators used promotions that highlighted other people's success stories, such as in emails, promotional moving banners, and dedicated sections on their websites showcasing other consumers' wins.

Lottery-focused operators featured promotions emphasising how **gambling supports good causes and charities**. For example, the National Lottery used email messaging to promote the idea that gambling benefits the UK, stating: 'Every time you play, the UK wins.'

Why it is important: Showcasing top prize winners, and depicting winning as life-changing can [create misleading impressions of winning prospects and risks](#).

Marketing gambling as a socially beneficial activity could provide [moral licensing](#), making consumers justify their participation by viewing it as a good deed. While this is an accepted fundraising method for lotteries, [which are associated with relatively lower risks of gambling harm](#), the impact of these techniques on newer and [higher risk](#) products like online scratchcards and instant win games is not yet well-understood.

RESTORING A HISTORIC LIDO



Ruth de Mello has happy childhood memories of Saltdean Lido and is excited that the historic site is being fully restored with support from The National Lottery.

MEET RUTH

EVERY TIME YOU PLAY, THE UK WINS

By playing The National Lottery, you help raise over £30 million every week for good causes*. So every time you play, the UK wins!

Associating gambling with good causes – The National Lottery



Scratch for **Pets!**

TOP PRIZE **£50,000**

Support the **Blue Cross for Pets** charity! Blue Cross is dedicated to helping sick, injured and homeless pets since 1897. Their vision is that every pet will enjoy a healthy life in a happy home. So, scratch your way to **£50k** and support this fantastic charity as you do. **20p of every £1 staked goes directly to Blue Cross for Pets.** Return to player rated at 50%.

Linking scratchcards with charitable action – Lottoland

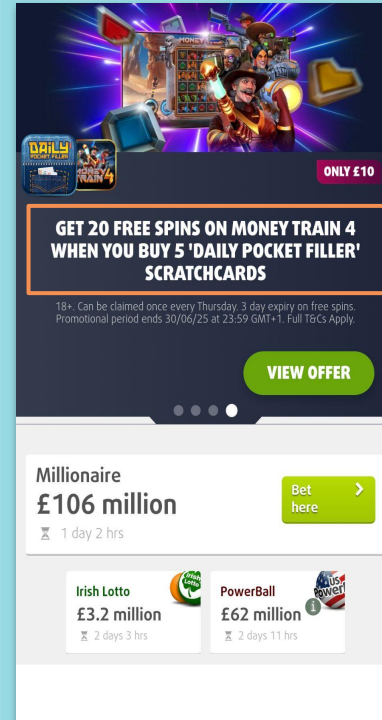
Theme 3 - Low friction to gameplay

Instant win games were promoted as a quick way to earn money

A few additional promotional techniques were common across instant win games, scratchcards, and slots, such as **highlighting previous wins** by displaying how many prizes were won within specific time periods.

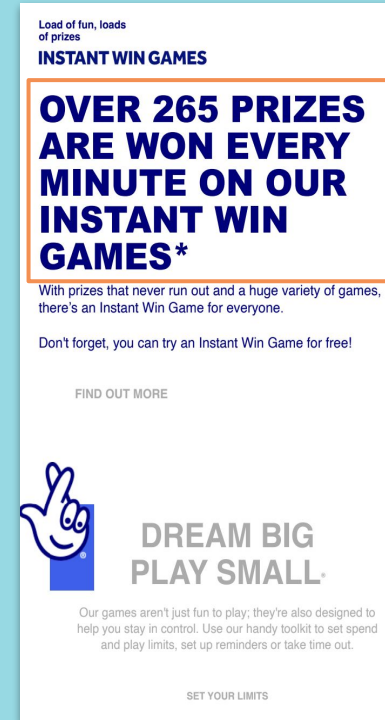
When promoted directly, **instant win games were presented as an 'opportunity to win money instantly.'** The word 'instantly' could create a sense of urgency and excitement, making the prospect of winning more imminent than it actually is.

Scratchcards were sometimes offered at a discounted rate for playing other games. Such cross-promotions across games may encourage consumers to engage with products they might not have otherwise tried.



The screenshot shows a mobile app interface with a dark background. At the top, there's a colorful illustration of a person holding a scratchcard. Below it, a green banner reads "GET 20 FREE SPINS ON MONEY TRAIN 4 WHEN YOU BUY 5 'DAILY POCKET FILLER' SCRATCHCARDS". A small text below the banner says "18+ Can be claimed once every Thursday. 3 day expiry on free spins. Promotional period ends 30/06/25 at 23:59 GMT+1. Full T&Cs Apply." A green button labeled "VIEW OFFER" is positioned to the right. Below this, there's a section for "Millionaire" with a prize of "£106 million" and a "Bet here" button. At the bottom, there are two smaller cards for "Irish Lotto" (£3.2 million) and "PowerBall" (£62 million), both with "Bet here" buttons.

Promotion to buy daily scratchcards for free spins – Lottoland



The screenshot shows a mobile app advertisement with a white background. At the top, it says "Load of fun, loads of prizes" and "INSTANT WIN GAMES". Below this, a large orange-bordered box contains the text "OVER 265 PRIZES ARE WON EVERY MINUTE ON OUR INSTANT WIN GAMES*". Below the box, it says "With prizes that never run out and a huge variety of games, there's an Instant Win Game for everyone." and "Don't forget, you can try an Instant Win Game for free!". A "FIND OUT MORE" link is present. On the left, there's a blue hand icon pointing up. To the right, the text "DREAM BIG PLAY SMALL." is displayed. Below that, it says "Our games aren't just fun to play; they're also designed to help you stay in control. Use our handy toolkit to set spend and play limits, set up reminders or take time out." and "SET YOUR LIMITS" at the bottom.

Instant win games advert – The National Lottery

Information provided

This section includes information about how game-specific details are displayed. Such information can help customers make informed decisions about their chances of winning and the game's mechanisms.

Game promotion - key findings



Gambling games were presented and categorised inconsistently across platforms. Scratchcards and instant win games were sometimes grouped with traditional casino products or placed in multiple categories, which could create confusion for consumers.



Operators consistently highlighted visual and promotional features, while information about odds, probabilities, and game rules was harder to locate. Although available, this content was often less visible and inconsistently placed across platforms.



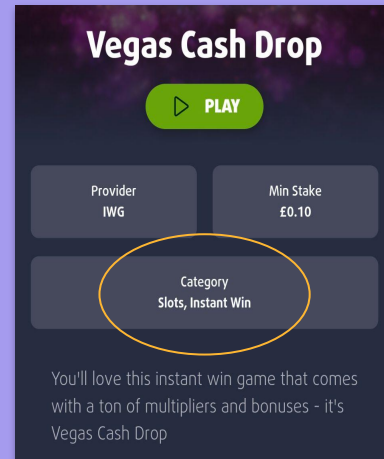
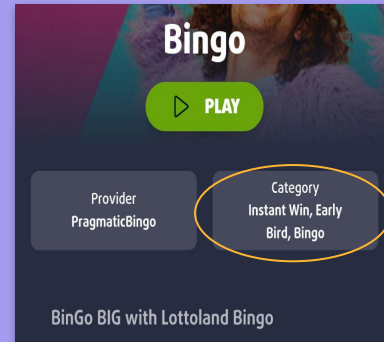
Where provided, game descriptions frequently used vague, incomplete or technical language and tended to emphasise positive outcomes. This reduced clarity about game mechanisms and odds, potentially encouraging play without a full understanding of the risks involved.

Product categorisation varied inconsistently across operators

Scratchcards and instant win games were often broadly categorised as 'games', 'gaming', or 'casino games', alongside traditional casino offerings like slots or table games. However, **operators varied in their categorisation:**

- Some created distinct categories for instant or scratch games.
- Others grouped them with bingo, slingo, or slot games.
- Sometimes games were not immediately visible as a dedicated category but were accessible via the search function.
- Instant win games and scratchcards were occasionally treated as interchangeable.

The inconsistent categorisation of games across different platforms may lead to a lack of clarity around the regulatory protections applicable to a specific game (e.g., stake limits), as well as the nature and risks of a game without playing it.



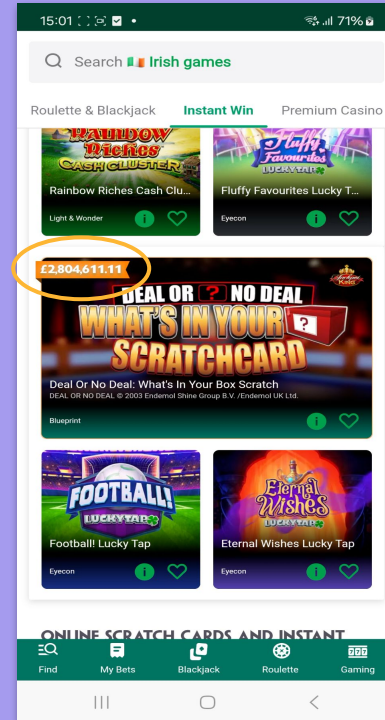
Examples of games with multiple categorisations – Lottoland

Pre-game interfaces prioritised visual features over key information

All operators prioritised visual representations of games and promotional features over informational or safer gambling content:

- Both game selection and game-specific landing pages **featured prominent game-related visuals and sometimes promotional features** (e.g., jackpot updates, promotional banners) that took up the majority of the space.
- Similar visual themes were used across instant win, scratchcard, and slot games (e.g., coins, diamonds, sports references), with stylised text sometimes used to highlight winning potential.
- By contrast, **information on game mechanisms and odds (e.g., Return to Player, or RTP) was almost never present on game selection landing pages.** It was also inconsistently and less prominently presented on game-specific landing pages.

Why it is important: The emphasis on appealing visual features and [promotional elements may create choice environments that lead to higher perceived chances of winning](#), encouraging impulsive play over informed decision-making.



Prominent visuals and live Jackpot on game-selection page – PaddyPower

Theme 2 - Unclear information

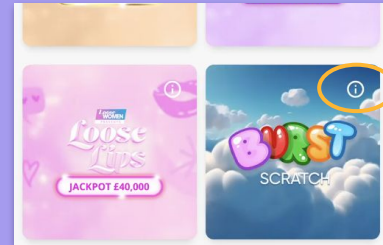
The location of game information was inconsistent

There was limited consistency in how customers accessed game specific information, such as details about chances or how to play:

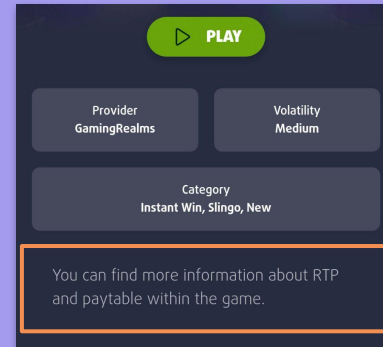
- Some operators made it mandatory to view game-specific information before proceeding to a game.
- Others required consumers to click low-visibility buttons on game selection pages to access this information.
- In some cases, consumers had to enter the game itself to find details. There, information appeared as visual pop-ups providing minimal detail, or **was hidden behind low-visibility buttons or menu bars**.

Information about **RTP was often the last item displayed on pages**. One instant win game had 22 pages of rules accessible within the game, with the RTP located at the very end.

Difficulty accessing game-specific information can lead consumers to rely on incomplete assumptions, especially problematic for new consumers who may not know what information to seek or why it matters.



Pre-game information accessible only via clicking on small information icon on game posters – Mecca



Small text indicating that RTP and payable can be found within the game – Lottoland



Game rules and payable accessible (bottom) after clicking on small in-game drop-down button on top-right of interface (top) – Ladbrokes

Theme 2 - Unclear information

When information was present, this was often incomplete or vague

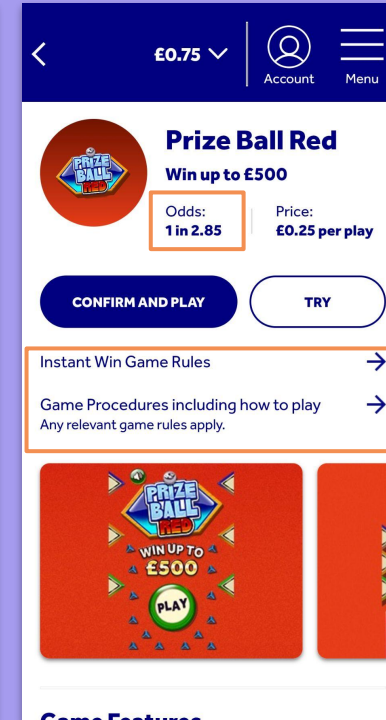
While simple odds and RTP were presented in a consistent format, other information that helps understand potential wins, chances of winning, and the game's rules was inconsistent and unclear:

- Information about the amounts that customers may potentially win, such as paytables, sometimes **offered only partial information**. Examples included listing prize amounts without their corresponding probabilities, or requiring users to do their own calculations to understand their chances.
- Information provided tended to use vague thematic language, such as 'a golden lobster in the Maine triggers the pelican bonus', explaining actions that may happen in the game over simple instructions, such as 'the game only consists of one click of the spin button'.
- The National Lottery was an exception as it offered information about the games in a clear and more complete manner.

When key information is vague, consumers cannot effectively assess game risks or compare options, potentially leading to less-informed gambling decisions.



No information on odds/RTP or more information on game-specific landing page – Mecca



Visible odds and easy access to more information on game-specific landing page – The National Lottery

Gameplay

This section includes findings on the features encountered when somebody plays an instant win game or scratchcard. Where relevant, these are compared to similar features when playing online slots.

Gameplay - key findings



Some operators present hypothetical winnings after demos, which may encourage consumers to play with real money.



Default stakes were often set above minimum amounts which may lead to consumers betting more than intended, as people tend to follow default options.



Games were designed for fast, simple, and continuous play, with each round typically lasting only a few seconds, and prominent 'play again' buttons combined with less prominent 'exit buttons'.



Bright colours, upbeat sounds, and celebratory animation, were common. These may enhance engagement and encourage continued play through positive reinforcement.



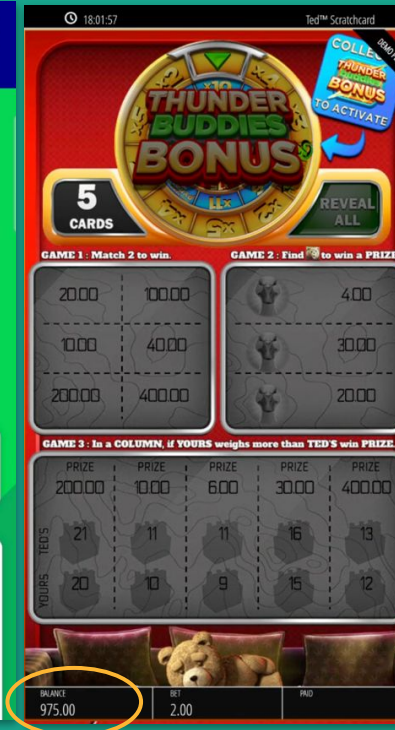
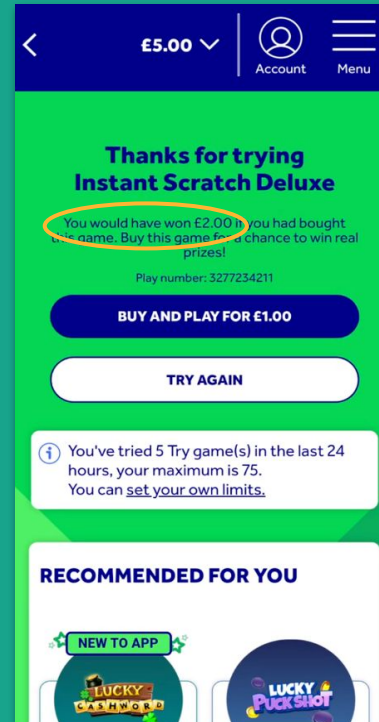
Balance and timer information were often less prominent than other game features, including those encouraging continued play, such as in-game top up options.

Winnings from demos may encourage subsequent play with real money

Two operators offered demos for some games. No difference was observed between the demos and sessions played with actual money, except that for one game, a consumer's balance was displayed as a **high hypothetical amount (e.g., £975)**.

After winning in a National Lottery demo, **hypothetical winnings were highlighted** (e.g., 'you would have won £2.00 if you had bought this game') alongside a salient button to buy a card.

Presenting free demos with identical gameplay to paid versions, displaying high hypothetical balances, or highlighting small 'would-have-won' amounts may create unrealistic expectations, downplay the risks of gambling, and encourage consumers to transition to real-money play.



Prompt given after playing the free demo – The National Lottery

High hypothetical balance when playing a demo – Bally Casino

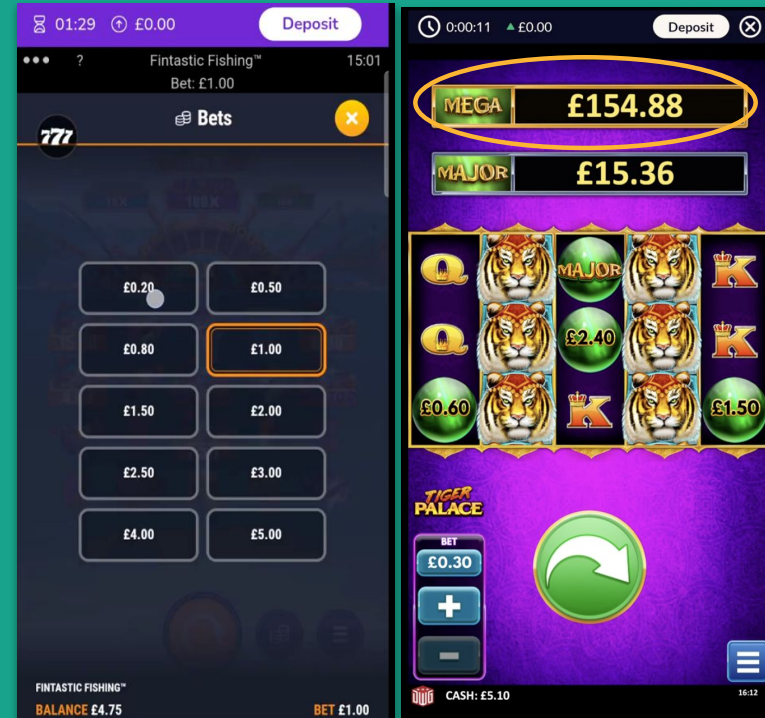
Default stakes and in-game jackpots encourage higher spending

Most operators and games allowed consumers to set and change stakes during gameplay. However, the National Lottery and one other operator's scratchcards required consumers to select fixed stakes before entering games.

The **default stakes were typically set above the minimum stake required.** The maximum win was sometimes shown and moved up and down as the stake was adjusted.

Some games incorporated jackpots during gameplay. One operator displayed a notification saying, 'This is too low to qualify for the jackpot,' when a low stake was entered.

Why it is important: [Defaults](#) can shape consumer behaviour because people tend to follow initial salient options. When default stakes are set above the minimum amount and linked to higher potential wins, consumers may be encouraged to bet more than intended. In-game jackpot entries highlighting big winnings may also prompt consumers to bet more than intended for a chance at bigger winnings.



Default bet stake above the minimum amount – Mecca slot game

In-game jackpot – Betano

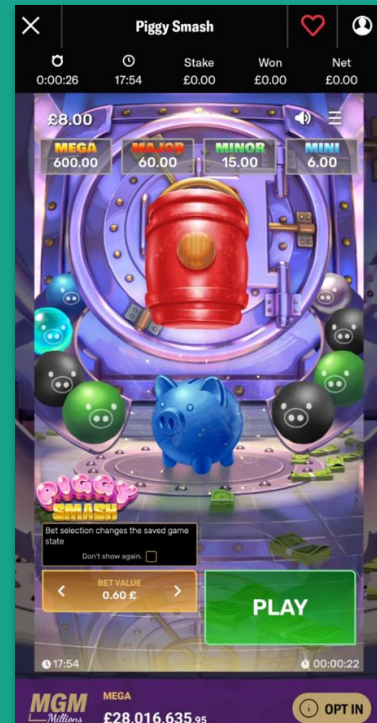
Games were fast and easy to play

Most games could be played in **under 30 seconds**, often with a single click.

- **Slot games were particularly fast**, typically lasting 5–10 seconds, but many instant win games and scratchcards also shared this brief duration.
- Instant win games took various formats (e.g., slingo, roulette, or slot-style games), but typically had fast learning curves.
- Scratchcards typically involved a virtual rubbing action to reveal results. Some featured multiple mini-games on one card, though most included a **'reveal all' button** that instantly displayed outcomes without interaction.

Why it is important: Fast and easy gameplay design [appeals to the desire for immediate rewards, can reduce impulse control, and encourages repeated play during heightened emotional states.](#)

Scratchcards are often viewed as low-risk, but given their speed and similarity to slot games, this perception may warrant reconsideration.



Instant win game resembling video game graphics, which is quick and easy to play – Bet MGM



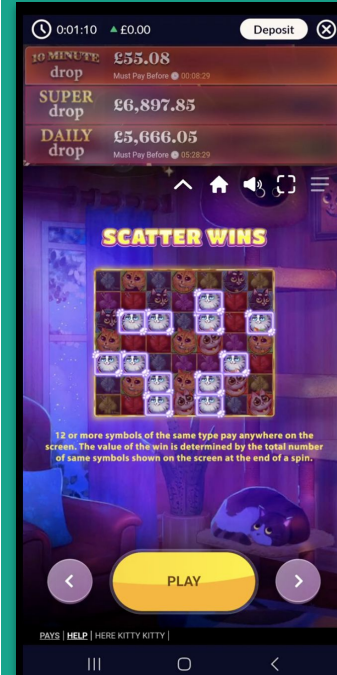
Scratchcard with salient 'reveal all' button – Mecca Bingo

Visual and audio features were used to enhance game experience

Attention-driving visual and audio features were typically used during play:

- **Bright colours** were used across games and operators (e.g., elements such as game bonus features were highlighted against dark backgrounds on scratchcards).
- Game designs were typically **themed** (e.g., animals, films, mythology) and some resembled video games.
- Gameplay featured **upbeat background music and sounds**. Some also featured playful noises and humorous comments.

These themes may heighten emotional arousal through evoking excitement, luck, and optimism.



Highlighted winning pattern – Betano



Irish/luck theming – Paddy Power



Film themed scratchcard – Paddy Power

Wins were celebrated whereas losses were typically downplayed

Wins and losses typically triggered very different responses:

- **Winnings were celebrated** with joyful sounds and visual effects including flashing animations and prominent display boxes. This happened even when the amount won was less than the stake placed.
- **Losses typically led to minimal or no reaction or prompted continued play** (e.g., 'Better luck next time' messages with sad music, or 'Try again.').

Why it is important: Positively highlighting wins while downplaying losses can distort consumers' perceptions of their overall outcomes and [encourage play through positive reinforcement](#). Losses that are not clearly signalled could confuse consumers as to whether the game had actually taken place, or encourage continued play to trigger a reaction.



The game display after a loss – Bally Casino



Highlighting of win – Pink Casino

Safer gambling features were typically present but not prominent

Consumer balance and timers were present across all operator platforms and games **except for the National Lottery**. However, the prominence of this information varied:

- Some had bold displays, whereas others were small and barely readable.
- Some operators used multiple banners to display information, making the winning amounts or balances more prominent while the net balance less visible.

Few operators enabled consumers to navigate to safer gambling information via menus whilst in the game. One operator required consumers to set a time limit before entering a slot game.

Why it is important: [Clear display of balance, net spend, and session duration are legally required and helps consumers stay informed and in control](#). When this information is hidden or overshadowed by more prominent features, it can mislead consumers about their overall outcome and encourage continued play.



The balance is salient, the net win/loss is more obscure – Ladbrokes

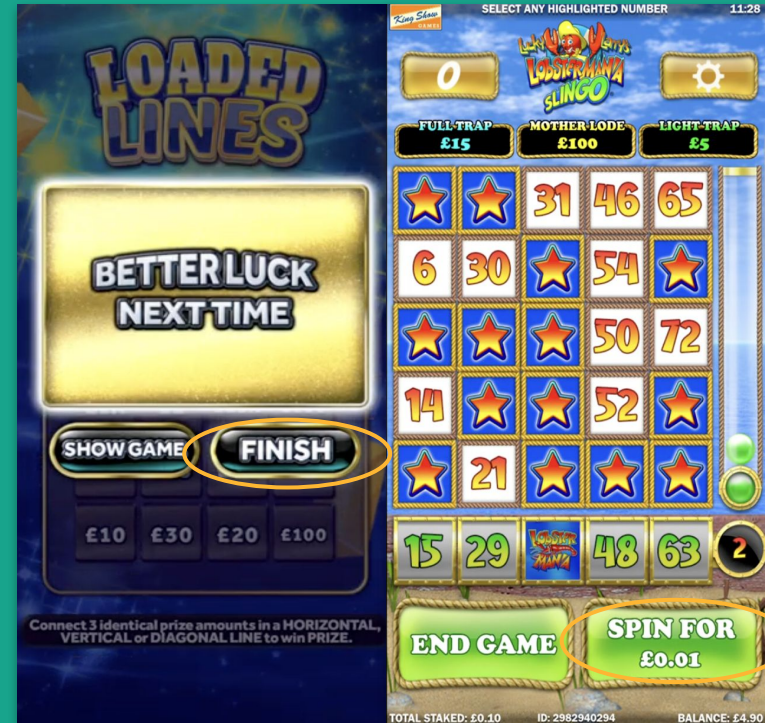
Game designs typically facilitated continued play

Across categories, games typically used features that were conducive to continued play:

- Many games featured prominent **'play again' buttons** during gameplay.
- For some instant win games, the first play required multiple clicks, but **subsequent plays/ spins could be bought with a single click.**
- Consumers could typically **add funds without leaving the game.**

By contrast, the National Lottery required consumers to exit the game and return to the landing page before deciding to play again.

Why it is important: [Reducing the barriers and friction to a behaviour encourages people to perform that behaviour.](#) By reducing the effort required to replay, game designs can shift consumer behaviour from deliberate decisions to [more automatic behaviours, which can increase the likelihood of gambling harm.](#)



A consumer must leave to play again – National Lottery

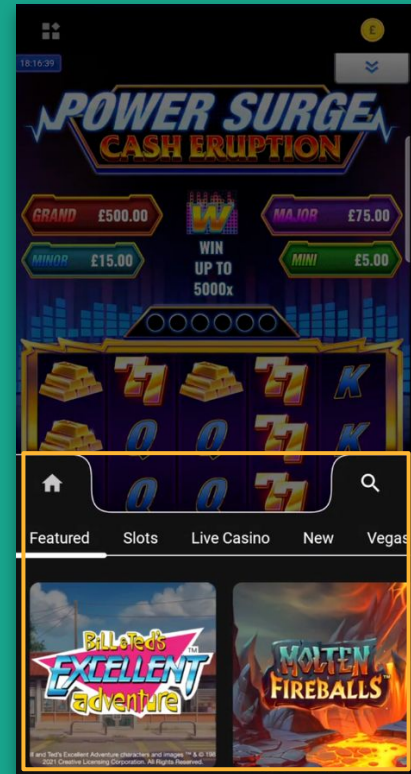
Salient button to spin again – Foxy Bingo

Some exit designs may promote further gameplay

For all games and operators, exiting the game required users to click on exit button(s), which were clear and sometimes salient. However:

- A few operators **positioned the exit button next to the more visually prominent deposit button.**
- For one operator, clicking the 'back icon' to exit a game did not lead to immediately exit but instead **revealed a menu bar with more games** and a small home button.
- In some instances, the exit button stopped working once play began, or simply refreshed the page rather than taking the consumer out of the game, potentially due to technical errors.

Difficult or unclear exit options can make it harder for consumers to leave the game, increasing the chance of prolonged and continued play.

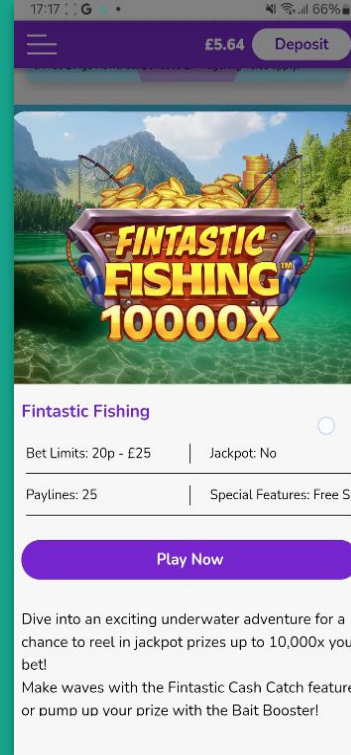


Attempt to exit leads to options to play other games – Bally Casino

Advertised stake limits sometimes did not reflect actual in-game limits

Across games and operators, a few instances of **discrepancies between the advertised and actual stake limits** were observed. For example, one slot game advertised a stake of £25 while the actual in-game maximum bet was limited to £5 ([the UK legal limit for over 25s](#)).

This could lead to false expectations and potentially encourage consumers to expect higher betting limits than are legally permitted.



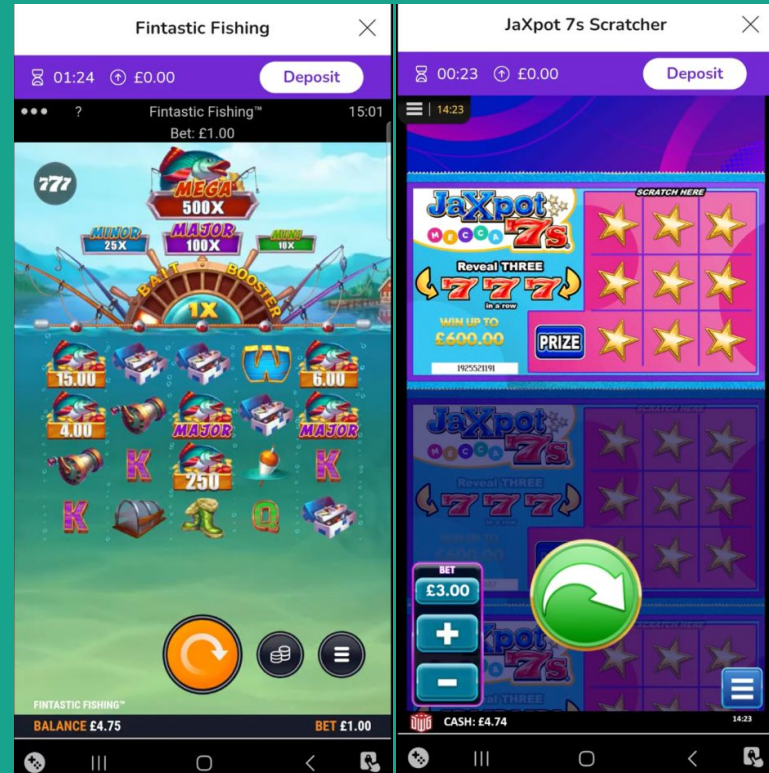
Landing page shows maximum bet of £25 – Mecca Bingo

Some slot games and other games have similar features, but different limits

The following comparison of a slot game (left) and a scratchcard (right) from the same operator demonstrates Theme 4 in practice. A person under 25 could place a bet above £2 on the scratchcard which is [above the legal limit for slot games](#).¹ However, there are many structural similarities between these games:

- Bright visual displays
- Both games could be played in around 5 seconds
- Gridlike appearance
- Wins occur from matching symbols
- Salient button to replay with lack of friction
- Exit buttons placed next to deposit button

The findings prompt consideration of whether the current regulatory framework, which applies stricter stake limits to slot games than to instant win games, is consistent with the observed similarities between these two game types



Visual design of a slot game – Mecca Bingo

Visual design of a scratchcard – Mecca Bingo

1. In Great Britain, online slot games have a legal maximum stake per spin of £2 for players aged 18 to 24, and £5 for those aged 25 and over. No similar caps currently apply to scratchcards or instant win games.

Summary of findings and recommendations

This section summarises the key findings and outlines potential actions. The four main themes cover all findings from the previous section, with each finding labeled by its theme in the top left corner of the slide.

Each recommendation was chosen based on its clear potential benefits to consumers, the existing evidence for what works to reduce gambling harm, and its ability to be implemented quickly.



Theme 1. Safer gambling messaging was less salient than promotions and often focused on individual responsibility

Theme summary: Safer gambling information was often less visible than promotional content in emails, on landing pages, and within games. Operators also presented the information inconsistently.

- Safer gambling messages were typically placed at the bottom of pages, displayed briefly, or were less prominent than promotional messages.
- During gameplay, player balances and winnings were more prominent than timers and net deposits.
- Safer gambling emails were less frequent than promotional emails.

Safer gambling messaging, when included, tended to focus on individual responsibility and management tools (e.g., deposit limits or reminders). It did not educate customers about risks, signs of harm, or support services. Some messaging unintentionally encouraged gambling by framing it as fun or socially beneficial. While promoting charitable contributions is positive, it can downplay potential harms if not balanced with clear risk communication.

Recommendations: Operators should ensure symmetry between the visibility of safer gambling content and promotional content. Regulation should consider minimum visibility standards for safer gambling information.

- Operators should ensure that safer gambling information is equally visible across all parts of their site, including landing pages, emails, and games.
- Timers and net deposits should have minimum visibility standards and be as prominent as the balance and winnings.

Additionally, messaging should provide clear, accurate information on gambling risks, signs of harm, and how to access support. It should also avoid language that might encourage gambling.

Theme 2. It was hard to find accurate and complete information about how to play, potential wins and chances

Theme summary: Information about how to play, stakes, odds, and potential prizes was often inconsistent and hard to find. Promotional visuals took priority on platforms. While some games presented this information clearly before customers played, others only made it available after a game started, requiring players to navigate through menus. Typically, the RTP percentage was the last detail shown.

Information that allowed users to infer the chances of winning were missing or incomplete, for example pay-tables were often difficult to read because they lacked information or required calculations.

Some game descriptions also used long paragraphs with jargon and misleading phrases like 'double chance to win.' In some cases, the advertised stakes were higher than the actual stakes available to play.

Recommendations: Further research should be conducted to understand how the location, salience, and framing of game-specific information impact consumers' engagement and comprehension. This includes:

- Testing where game information should be placed to increase engagement.
- Testing what minimum information is needed when discussing odds and potential wins so that customers can accurately understand their chances.
- Testing different ways of presenting game rules to improve comprehension and exploring how customers use this information when they decide to play.

Overall, a consistent, evidence-based approach to information provision across the industry would be valuable, as it would ensure customers have complete and accessible information before they begin to play.

Theme 3. The design of games and promotions encouraged gameplay whilst some discouraged exiting

Theme summary: Promotions created a sense of urgency to play and win quick money. In some cases, real-money gameplay was further encouraged by offering free demos and showing players what they could have won.

Game design features encouraged continuous engagement and higher spending:

- Default stakes were set above the minimum.
- Games were quick and easy to play, with scratchcards offering 'reveal all' buttons.
- Prominent 'play again' buttons appeared as soon as games ended.
- Some games allowed one-click spin purchases and instant in-game deposits.
- Wins were celebrated with music and animations, whilst losses were downplayed, often without a clear end to the round.

Additionally, exit buttons were sometimes placed next to prominent deposit buttons, or did not actually exit the games.

Recommendations: Further research should be conducted to understand the impact of free demos and reduced gameplay friction on the likelihood of experiencing gambling-related harm:

- Test whether offering free demos and showing hypothetical winnings makes real-money gameplay more likely.
- Investigate how the process for exiting a gameplay session can be made as easy and accessible as the option to continue playing.
- Test how to best mark losses.

Insights from this research can help inform evidence-based guidelines for safer game design.

Theme 4. Slot games, instant win games & scratchcards had similar structural features and gameplay experiences

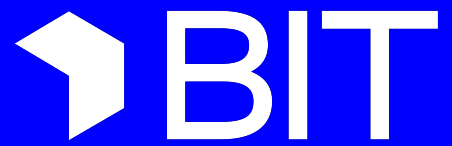
Theme summary: While scratchcards mimicked the look of physical cards, instant win games offered more visual and gameplay variety. Many of these games, however, operated like slot games. There was also inconsistency in how operators classified the three game types.

- The different game types generally shared similar themes and designs.
- Many instant win games, including most scratchcards and slots, featured a simple grid of icons and a single play button. Most were quick to play (under 10s), with scratchcards often offering a 'reveal all' option to speed things up. Some games were more complex, incorporating elements from bingo or video games.
- Almost all games didn't automatically exit between rounds. The National Lottery being a notable exception, whereby players had to leave the game after each round.

See [page 39](#) for a visual demonstration of these similarities in practice.

Recommendations: Greater attention should be given by policymakers and the industry to the design and presentation of online instant win games and scratchcards, particularly their categorisation, given the structural similarities identified with slot games.

This should include a clear definition of what an instant win product is. These products have traditionally been seen as lower-risk than slot games; however, this audit found notable similarities between instant win games, scratchcards, and slot games. As these products become more popular, their design and presentation should be carefully reviewed to prevent unintended harm. Further research could be conducted to better understand the harm profile of these products.



Get in touch:

gambling@bi.team

APPENDIX

Appendix 1: Regulatory overview

Instant win games and scratchcard games:

Commercial instant win games and scratchcards (excluding those offered by the National Lottery) are regulated by the Gambling Commission under the Gambling Act 2005.

All commercial remote instant win games must comply with different rules in order to be licensed. These are outlined in the Remote Gambling and Software Technical Standards (RTS), except where provisions only apply to certain gambling types (e.g., RTS 15 for in-play betting).

There is no statutory definition of 'instant win' games.

Instant win games offered on operators websites are different from Interactive Instant Win Games (IIWGs)- which are an instant lottery product which can be played through the Licensee Platform. All IIWGs have an outcome that is pre-determined at the point of play.

The National Lottery:

Games issued by The National Lottery do not have to comply with the same regulations as other operators.

The National Lottery is regulated by the Gambling Commission under the National Lottery etc. Act 1993.

Online instant win games (and online scratchcards) provided by the National Lottery must comply with the Interactive Instant Win Games Licence 2021, issued under the National Lottery licence.

The RTS issued by the UK Gambling Commission **do not legally apply** to the National Lottery.

However, the Commission has stated that National Lottery operators are expected to adopt RTS where appropriate, as a matter of good practice, especially for consumer protection and fairness.

Appendix 2: Desk research supplementary information

The desk research focused on two key areas:

1. **Influential website features and elements:** which gambling features and design elements had been previously studied, their associated risks, and the existing gaps in the literature. It also examined how these design features are regulated across different types of games and operators. The final chosen gambling features and design elements were outlined in the codebook.
2. **Harm risk factors:** key factors that can be influenced by game designs and the wider gambling environment, which may increase or decrease the likelihood of consumers experiencing gambling-related harm (for example, attention, arousal, or other psychological responses).

Appendix 3: The codebook outlined the steps researchers had to follow whilst conducting the audit

Areas of interest

These included the focus areas for data collection:

- 1. Marketing before gameplay.** Content seen from app entry to game selection, including adverts, promotions, or safer gambling messaging.
- 2. Instant games/scratchcard landing pages.** Any screens encountered while navigating and choosing which gambling games to play.
- 3. Landing page of the game itself (if exists).** Informational pages about a specific game before gameplay begins (if available).
- 4. During the game (playing the instant win game/scratchcard).** All consumer interactions and content during the gameplay itself.
- 5. After the game has finished.** What occurs after the consumer exits the screen with the game.

Highlighted elements:

For each area of interest, the codebook noted elements linked to potential gambling harm, such as:

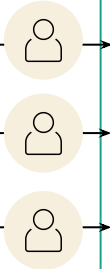
- 1. Visual elements**
 - a. Colours used
 - b. Symbols and imagery
 - c. Other attention driving elements
- 2. Texts**
 - a. Framing of the information
 - b. Clarity in texts
- 3. The 'mechanical' game design** (relevant for gameplay)
 - a. Speed of play
 - b. Game flow/consumer journey
- 4. The winning mechanism** (relevant for gameplay)
 - a. Feedback and game outcome
 - b. Exiting process

Appendix 4: Audit data collection process

Agree sample

The final agreed sample consisted of:

1. The National Lottery
2. Lottoland
3. Pink Casino
4. Bally Casino
5. Foxy Bingo
6. Mecca Bingo
7. PaddyPower
8. Ladbrokes
9. Betano
10. BetMGM



Data collection

After a pilot, three researchers collected data following these steps:

- Followed the areas of interest from the codebook
- Played 1 scratchard, 1 instant win game and 1 slot game on each operator platform, until they won or lost once on each game.
- Screen recorded the whole process.
- Wrote descriptions of their observations in the codebook. This included an analysis of playing behaviour and observations of game design features.
- Answered yes and no questions about the inclusion of certain elements.

Collection timeframe: 28 April - 19 May 2025

Analysis

Deductive coding was used to organise the data. This involved applying existing theories and frameworks to the qualitative dataset. This approach was adopted because the audit focused on factors that could increase or decrease the risk of harm, as well as specific design features, allowing some categories to be defined in advance.

The data were then further analysed using thematic analysis, with the aim of identifying key themes emerging from the qualitative material.