Responsible Gambling: Collaborative Innovation Identifying good practice and inspiring change

A Revealing Reality Report
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REVEALING REALITY

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Foreword
John Hagan
IGRG

The continued collaboration and ongoing commitment by all sectors of the gambling industry to ensure the consumer remains at the forefront of everything we do is paramount.

This report not only reflects good practice, it highlights where and how the industry can make further improvements. It sets examples of change and provides food for thought as to where and how to implement change.

The report recognises the challenges in agreeing a common approach that works for all sectors, products and customers. The report also acknowledges that there is a trade-off between technically accurate messaging information currently in use and the opportunity to adopt more creative ideas, leading to greater cut through and impact.

The need for further collaboration goes without saying, as does the need to ensure that trialling new approaches should reflect and complement existing messaging and ongoing responsible gambling work that individual companies are undertaking outside of this project. Industry companies will review the key findings collectively and individually and consider their relevance to their business, with everyone working towards clear outcomes for players and finding effective solutions. As the report says and which we would wholeheartedly endorse, “industry is ready for this kind of maturity”.

John Hagan
Chairman, Industry Group for Responsible Gambling (IGRG)

Acknowledgements

About this report

- This report outlines a new vision for Responsible Gambling (RG) within the industry
- In addition to defining new frameworks for understanding key priorities, it provides examples, new ideas & recommendations for how operators of all sizes, across all sectors, might meet these challenges
- The initial chapters provide an accessible guide to findings and recommendations, with extended technical appendices that elaborate on methodological detail, and the wide-ranging primary and secondary evidence that informed this report

About the contributors

The project was independently designed and led by the research team at Revealing Reality.

The project was originally instigated by the **Industry Group for Responsible Gambling** (IGRG) in four parts, focusing on Product Information, In-play Messaging, Social Messaging and Staff Training respectively.

Gamble Aware agreed to IGRG's request to commission the projects, which was supported by the **Gambling Commission** and the **Responsible Gambling Strategy Board** (RGSB), providing both funding and independent governance under the charity's Research Committee. The **Senet Group** part-funded the Social Messaging project.

This project was supported by a wide range of operators and service providers including: (in alphabetical order) *Aspers*, *Betway*, *Caesars*, *Castle Leisure*, *Essex Leisure*, *Gala*, *GamCare*, *Gambling Compliance*, *Genting Casinos*, *Jennings Bet*, *LadbrokesCoral*, *Paddy Power Bet Fair*, *Playtech*, *Pontins*, *Praesepe*, *Project Coin*, *Rank*, *Talarius*, *Tombola and Welcome Break*.

The projects have been advised by a coordination group which included representatives of RGSB, Senet, GambleAware and the Gambling Commission meeting regularly with the IGRG sponsors of the projects – John White (Bacta) for staff training and Miles Baron (The Bingo Association) for the three messaging projects.

For different parts of the project, Revealing Reality collaborated with:

- **Future Thinking**, who conducted additional research on Social Responsibility Messaging
- **18 Feet and Rising**, who worked on creative message development
- **Together Creative**, who worked on developing and communicating other new ideas for concept testing

Research contributors

This report builds on the evidence and hard work of a number of dedicated academics and researchers whose commitment to generating robust knowledge about responsible gambling has underpinned all of our work. Academic contributions have been received from: Professor Alex Blaszczykski, Dr Sally Gainsbury, Tracey Cochrane, Jamie Wiebe, John Kelly, Mike Kenward, Rachel Volberg, Dr Jane Rigbye, Janine Robinson and Professor Mark Griffiths.

We'd also like to thank the many players and staff we interviewed as part of this project (over 160 players and 70+ staff) from across a range of sectors, whose candid and honest reflections about their experiences of gambling and their understanding of current initiatives have led to a great number of insights and ideas.

Structure of this report

This report will start with an exec summary; the objective of which is to give an overview of the report and to provide a short summary of the methodological detail. It will then go on to explore existing good practice and current challenges within the industry, subsequently leading to the following chapter which highlights a vision for change for the industry.

Chapter 5 explains the co-development of the three pillars of RG practice (enabling informed choice, improving self-awareness and creating supportive environments), which acts as an introduction to the three succeeding chapters. Each of these three chapters explores one of the three pillars; highlighting key insights from the research and practice to learn from.

The report is concluded with a final chapter that looks at recommendations and potential next steps. At the end of this report, there are three annexes: one containing four case studies from the primary fieldwork phase of this research; one listing a number of psychological biases relevant and referred to throughout this report; and one containing further methodological detail.

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Executive summary

A pioneering collaboration

This project represented a pioneering collaboration between the UK gambling industry, key stakeholders, independent social researchers, industry experts and innovators.

Its aim was to not only understand the current landscape of Responsible Gambling (RG) within the industry, but to build on the wealth of research conducted to date regarding best practice RG activities.

This project couldn't have happened without the support of a range of operators, some of whom showed exceptional commitment to the process.[1] During the seven working group (WG) meetings, contributors gave their time and experience, and importantly were also honest about areas for improvement and forthcoming with (and supportive of) new ideas.

The conclusions and recommendations of the project were informed by this industry-wide consultative approach, but are the independent views of the research team from Revealing Reality.

Approach and methodological overview

The project was independently designed, facilitated and written up by Revealing Reality (*www.revealingreality.co.uk*).

The approach was designed to:

- **Promote collaboration:** Industry representatives played an integral part of the project (see Annex 3 for participants) – including the attendance at working groups which played a pivotal role in shaping the content of the project & providing industry knowledge that helped to assess the realism and actionability of ideas
- **Share good practice:** Gathering, collating and analysing existing industry practice was the foundation of the work – and all the operators involved in the project (and beyond) openly shared examples of their current practice and practical learnings.
- **Real-world realism& innovation:** Whilst existing practice was important, throughout the research the team used a range of primary and secondary research approaches to identify gaps in current practice and provide challenge to encourage innovation
- **Role-model replicable methods & approaches to RG innovation:** Throughout it was important that the processes, tools and techniques we used could be replicated by operators in developing their own innovation approaches. For example, incorporating 'agile' or commercial market research techniques where appropriate.

1 Refer to page 6: 'About the contributors' section for list of operators

All four workstreams followed a similar methodology:

1. Working group discussion
2. Evidence gathering
3. Analysis

STEP 1

REVIEWING CURRENT PRACTICE AND KNOWLEDGE

Workin Group 1:
Creating a shared vision

Research team gathering and analysing examples of existing practice and reviewing evidence

STEP 2

IDENTIFYING GAPS AND REMAINING CHALLENGES

Working Group 2:
Identifying gaps and challenges

Research team conducting site visits and new primary research players and staff across all sectors

STEP 3

DEVELOP AND TEST NEW IDEAS

Working Group 3:
Identifying gaps and challenges

Research team developing ideas generated within the WGs and testing them with staff and players

A new vision for the industry

The best practice review revealed numerous examples of existing practice (over 200 examples in total). These ranged from well-known campaigns like the 'When The Fun Stops' to less well-known initiatives, such as new staff training programmes – being developed 'behind closed doors' – to integrate responsible gambling practices into everyday customer service training.

Alongside the good practice examples submitted by operators, the research team also conducted a whole range of primary and secondary research activities, including expert interviews, venue visits, auditing online gambling platforms and interviews with both players and staff. It was clear that, despite the array of good practice examples submitted as part of the 'best practice' review, for a range of reasons these initiatives sometimes failed to have real impact on normal customers, during their typical gambling activities.

For example, many operators submitted to us RG 'player advice leaflets' during the best practice review, which when encountered by players in the playing environment could feel overly long and boring (especially when contrasted with the array of exciting games available in venues or online sites). In some cases, they were also hidden in dark corners of venues, buried on websites, or formatted to look like onerous 'terms and conditions'. The problem of RG initiatives lacking player impact was not unique to leaflets, and the examples of poor implementation could be extended to staff training, social messaging, product information etc. So, whilst many RG activities reviewed as part of the 'best practice review' represented *positive progress*, the execution of them in the 'real world' was frequently disappointing.

Working group members showed commendable enthusiasm for recognising that a lot more could be done. Many of the barriers were acknowledged as practical challenges that any business would face in trying to implement new initiatives (e.g. the effective design of solutions, staff compliance, culture change, silo mentalities within organisations). It was also recognised that many RG initiatives had not had the full benefit of in-house marketing and product design skills.

Even those operators who were seemingly the most 'advanced' in terms of RG practice identified numerous challenges that they'd experienced in trying to ensure initiatives were effectively implemented and impactful for players. Examples included ensuring that RG messages sat comfortably alongside (and not in tension with) marketing messages, while many faced understandable difficulties communicating complex product information to players who weren't necessarily interested in 'technical' details at the point of play.

One common misconception was that improving RG would involve 'adding new activities' to operations. However, after spending time in venues it's clear that *removing* some current activities may also be useful. For example, gambling companies who are serious about RG may need to consider discontinuing some communications activities that sit in tension with RG outcomes – for example, high frequency promotional messages or time-limited offers. More specifically, the research team encountered numerous examples of player-focussed communication that would likely trigger well-evidenced psychological biases to the detriment of players, which are clearly at odds with RG principles[2]. For example, operators unashamedly embraced and encouraged player susceptibility to false pattern recognition through the publication of 'hot & cold numbers' which, while excused as part of the 'theatre' of the game, could actively mislead.

At the time of writing it also took seconds to find operator websites with extremely high default spending limits, including one set to £99,999. These will almost certainly have a strong anchoring effect and encourage the setting of unrealistic limits across a playing population – while also likely resulting in higher amounts wagered by players in a session (a responsible approach would be to set the default low and force the player to increase it incrementally). Operators who promote and sign-post limit setting, effectively integrating it into the routine gambling experience, and who set low default limits, should be commended.

2 For a full list, please refer to Annex 2 at the end of this document

Easy-to-find, everyday examples like this, where operators have stated that they are committed to RG (the option to set limits being one such initiative) but have then undermined their efforts in execution – and in extreme cases like the limit-setting highlighted above have deployed them, knowingly or not, in a way that encourages irresponsible behaviour – illustrate clear double standards around RG.

Explanations for the failure to address these problems sometimes came across as well-rehearsed – for example, operators making circular arguments, or choosing to focus on the extreme difficulties they may face with implementing new ideas, rather than the effort they were putting in to solving them. Not infrequently, operators challenged a new idea by evaluating its likely effectiveness within the context of an extreme scenario where the intervention in question, or any other for that matter, may not work – e.g. 'how would this work for the highly transient and non-English speaking customer base of venues within central London's tourist hotspots?' There was also a regular suggestion that ideas would be too expensive or too risky to try without compelling academic evidence to back them up – an objection that clearly does not apply to non-RG aspects of the gambling business, such as the development of sales messages, nor indeed to many of the ideas presented that were low-cost and risk-free for players (e.g. lowering the default limit from £99,999 to a more realistic level, which would cost virtually nothing).

Some of the challenges raised within the working groups were felt to sit outside the control of individual firms. For example, many operators felt that the stringent regulatory requirements (e.g. around testing staff, logging interactions and mandatory product information) 'dulled creativity' and could inadvertently stifle innovation around RG. Operators also raised that they may have little influence over the design of RG measures in the games and the machines they buy from manufacturers – particularly if these originate from a non-UK based firm. Both points suggest that, while there is a whole range of options within the control of individual operators, ensuring the effective implementation of RG measures requires everyone to work better together, including supply chains.

Throughout the process the working group members were open to discussing these issues and, whilst excuses were often top of mind, there seemed a genuine intention to change. The good news is that this report highlights several easy wins that operators could act on immediately (and for little cost) if they so desire, and many other avenues to be further explored – something the working groups felt keen to do.

"The 2005 Act has totally changed the impetus to do RG in the gambling industry. Before there was nothing, now at least people are trying"

Working Group Member

"As an industry, we're good at making excuses for why we can't do something"

Working Group Member

A vision for change

Through reflecting on current practice and consolidating the key learnings from the research process, the operators collaborating on this project developed what they considered to be a coherent vision of requirements needed for the industry to achieve lasting change

Proactive & inclusive:
Operators need to proactively embed RG practice for all players

Not waiting for individuals to show signs of problems before RG becomes relevant; instead, moving away from reactive and medical models of 'gambling addiction', towards more inclusive and pre-emptive approaches

Integrated:
RG activities must be integrated with all other business activities

Encouraging RG measures across all business functions and customer-facing touchpoints – minimising inconsistency in messaging and incentives for both players and staff

Impact-focused:
RG activities need to be designed, delivered and assessed with customer impact in mind

Judging the success of RG efforts on the level of commitment invested to ensure impact with customers – drawing on a range of skills (e.g. creative, insight, innovation – many often already employed by larger operators) to achieve it

Empowering:
Staff and players must be supported with appropriate RG tools

Empowering staff and players with tools and techniques that give them confidence to engage flexibly and appropriately with RG activities

Continuous improvement:
The industry must cultivate a culture of ongoing learning

Operators require more by way of customer insight, design, and innovation/evaluation techniques to share practice, learn from existing progress and develop RG solutions and messages, which are more meaningful for staff and players

Three pillars of responsible gambling

- Over the course of the project, it became clear that the key areas of challenge and opportunity regarding RG fall clearly into three categories – as seen from the player's point of view
- Together, these different, outcomes-focused 'pillars' span all the four areas of work currently being undertaken by the Industry: Product Information, In-play Messaging, Social Responsibility Messaging and Staff Training[3]
- The user-centred 'pillars' represent a new, player-centric theoretical model for RG intended to be holistic, flexible and easy to understand

Enabling informed choice

Helping players to make more informed decisions about which games they play and how they play them (e.g. how long for, what stake).

Ensuring that players understand key gaming concepts and are able to critically reflect on cues and messages that form part of the game.

RG: Pillar 1

Improving self awareness

Providing appropriate tools and support to ensure that players are able to stay in control whilst gambling making decisions that are in line with their priorities and helping them to avoid regretting their choices.

RG: Pillar 2

Creating supportive environments

Ensuring that all staff and players recognise the value and see the personal relevance of responsible gambling activities.

Ensuring all staff feel confident to deliver and promote responsible gambling practice within and beyond the business.

RG: Pillar 3

3 For more information on how we reached this categorisation, see page 26

Pillar 1: Enabling informed choice

If players are to make informed decisions about which games to play, they must clearly understand the cost of play and likelihood of losing the game. To achieve this, operators (and game manufacturers) must make a concerted effort to ensure that players understand the cost and relative risk profile of different games.

Most current practice around 'informing player choice' seemed like it was designed to be technically accurate and 'available' (although often only if you looked for it). However, player feedback suggested that it was not easy to understand and there was little to motivate them to engage with it. Specifically, information was often poorly formatted, to the point of sometimes being totally illegible. Moreover, the length and technicality of language used to explain games was found to confuse players, with its placement often so far from the point of purchase that there was limited likelihood of it ever influencing decision-making. When contrasted with other information in the playing environment (e.g. marketing messages, membership information, game-play), this information was perceived to lack any kind of stand-out, and be boring, unengaging and overly complex.

In addition, the consistent focus on prizes and winning across numerous touchpoints appeared to be leading to a skewed perception of how likely 'winning' is. Similarly, the presence of certain 'theatrical' cues[4] and misinformation was also leading to a reinforcement of false-beliefs among players – for example, 'hot and cold numbers' potentially encouraging false pattern recognition, or messages that imply games are not random (e.g. reserving chairs).

Good practice and areas to improve

- Clearer, more visually engaging & comprehensible product information communicated at point of purchase – with player comprehension prioritised over technical accuracy
- Staff training in explaining product information and highlighting responsible gambling features of games – ensuring that staff do not endorse false beliefs or reinforce misunderstandings
- Better and more compelling ways of engaging players with product information (e.g. incorporation of product information in game-play or incentivising players to engage with information)
- Re-evaluation of the role of potentially misleading 'product information' within the gambling environment (e.g. 'theatrical' use of 'hot & cold numbers' or continuous reinforcement of 'likelihood of win' vs. 'likelihood of loss')

4 The term "theatrical cues" refers to all of the elements within a gambling environment that work together to build an overall experience, e.g. decorations, colours, sounds, staff uniforms, ambiance, advertising, information, signage etc. It can also be thought of as staging, experiential cues, or the theatre of experience

Pillar 2: Improving self-awareness

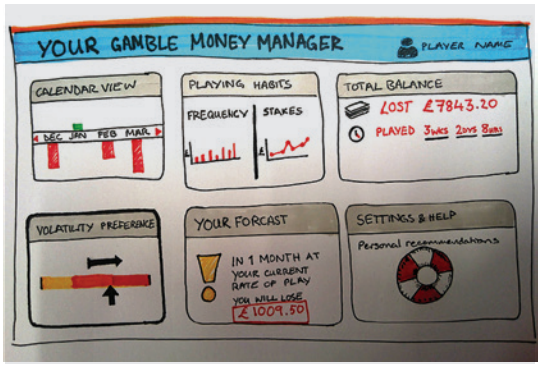
Players from a range of sectors sometimes describe a sense of 'dissociation' and narrowing of focus when gambling, which can impair self-awareness and result in them making decisions on the 'spur of the moment' that they may later regret. While many players are aware of the common-sense messages around gambling responsibly (e.g. not spending more than you can afford, setting limits), this information is often difficult to apply when 'in the zone'.

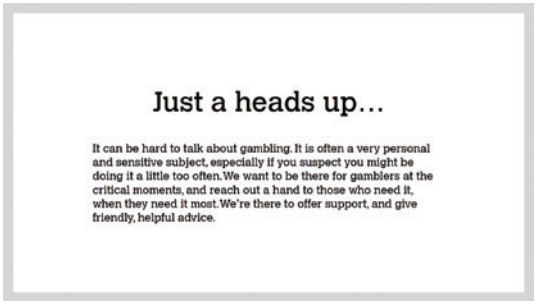
Player feedback suggests that, if done well, tools and strategies for helping players to be more self-aware and stay in control could be useful. Some players highlighted some examples of existing tools they did find helpful; others, however, drew our attention to practices they felt to be disingenuous and potentially harmful (e.g. extremely high default spend limits and difficulty in finding spend limits within their online player information settings).

A significant problem identified with current RG activity was that it is regularly perceived to be aimed at problem gamblers (and therefore appreciated by mainstream players as protecting 'vulnerable people', but not relevant for someone who doesn't yet have a problem). This challenge needs to be overcome if messaging is ever going to make any kind of preventative impact. Other 'awareness-raising' activity was perceived to be problematic because it simply repeated back obvious messages, without giving players any practical guidance on how to achieve the suggestions (e.g. a message saying 'stay in control' was perceived to simply state an obvious bit of high-level advice, without providing any realistic suggestion of how one might achieve this whilst gambling).

Good practice and areas to improve

- Social responsibility messaging that encourages self-awareness and provides practical tips/strategies to help players stay in control whilst gambling (helping players to **notice** messages, **think** about them and **do something** as a result)
- Incorporating, and making more readily available, easy-to-understand summaries of individual playing behaviour (e.g. receipts with clear spend summaries, pre-commitment devices with realistic default spend and time limits, player statements that enable individual tracking of time and spend, end-of-game play and spend summaries that provide a fair representation of losses)
- Training staff to feel more confident promoting preventative self-awareness strategies and to engage with players earlier and before problems emerge
- Using behavioural tools to provide positive distractions from the game (e.g. reasons to take a break, rewarding breaks and offering fun non-gambling games)





Pillar 3: Creating supportive environments

While staff regularly said that 'problem gamblers' were a priority, RG behaviours were often not top of mind beyond the licensing requirement. Staff regularly described lacking confidence in delivering RG messages (e.g. how to communicate effectively with players) and sometimes held myths & assumptions that were directly at odds with RG messages (e.g. helping players develop 'winning strategies' for random games, or encouraging players to 'chase their losses').

For the most part, few had ever received training in how to practically deliver and integrate RG practice into their day-to-day role. That said, many operators were developing some genuinely innovative practice – for example, integrating RG practice into core customer service training, ensuring RG was written into job role and performance reviews, and creating RG champions to act as role models: advocating good practice among their peers.

A key area that needs more work is what happens when staff have identified a potential problem at an early stage – for example, a conversation which leads a staff member to believe that a player doesn't properly understand the game they are playing or may have a personal issue that is impacting their ability to think clearly. Some operators had started to develop tools to help staff provide the right support (and avoid straying into territory beyond their remit) – for example, links with local advice-giving organisations or tools to better explain game features. However, these kinds of activities were far from mainstream and often limited in scope.

Good practice and areas to develop

- Training strategies that ensure RG activities are easy to apply and remember for staff in different roles
- Positive reinforcement and incentives for the promotion of RG, which are not contradicted by other business priorities
- Support for staff who may experience problems related to gambling themselves
- Strategies for ensuring players receive effective support for issues outside of operators' remits

What does 'best practice' look like?

Operator participants in this project spanned all gambling sectors, including larger and smaller businesses, land-based and online.

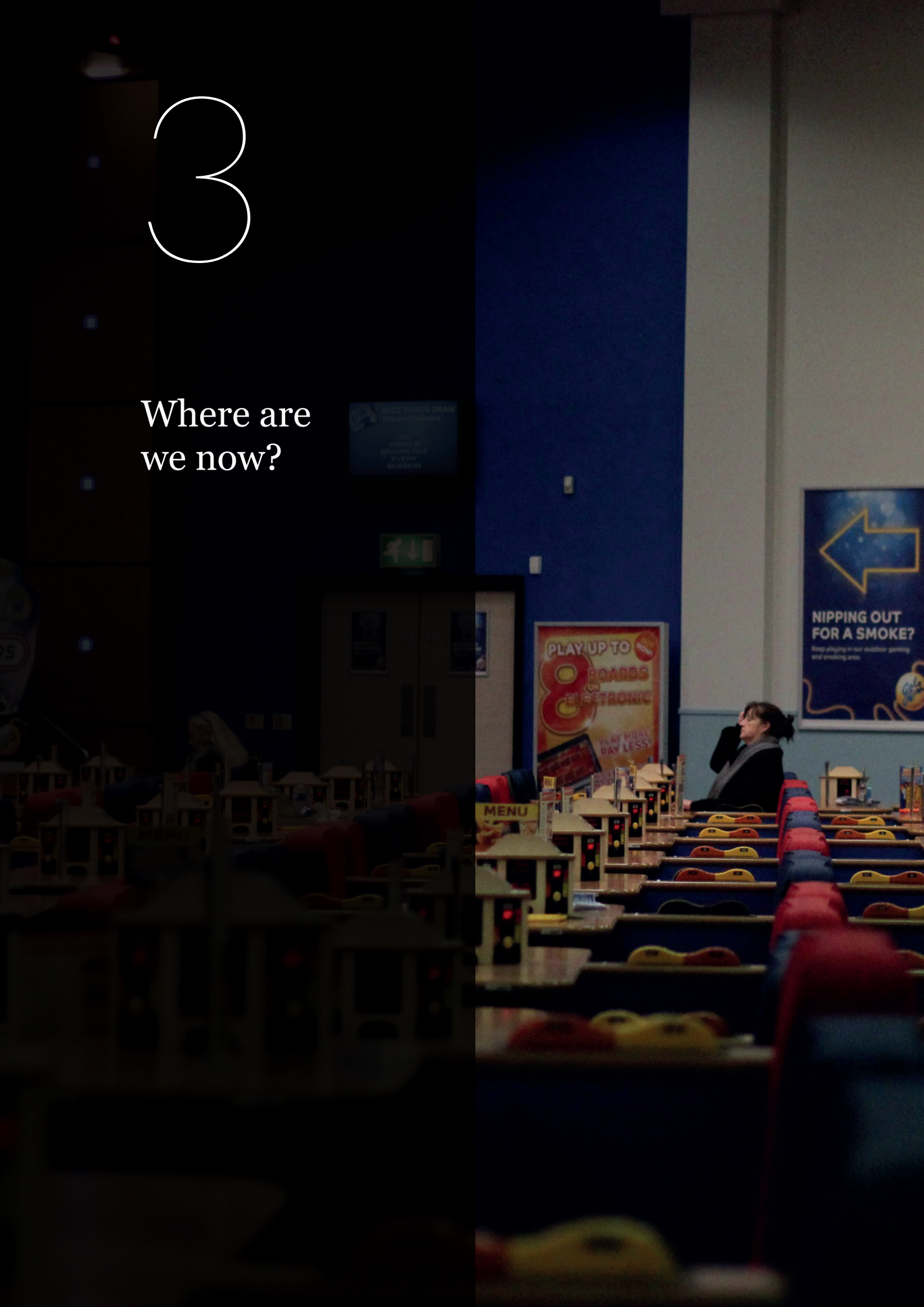
There is unlikely to be a 'single answer' to the challenges of RG which can be universally applied across operators of all shapes and sizes. RG strategies will therefore need to be tailored to the specific size and specialisms of different businesses (and in some cases, a greater impact will be achieved through collaboration between operators).

What is clear is that, for individual operators, effective RG activity requires a coherent approach to prevention and harm mitigation – one in which *all operator actions* across *all customer-facing* touchpoints mutually reinforce each other. It was also evident that, working alone, compliance teams may lack the out-reach and skills to make real impact. For example, current RG materials clearly lack the creativity that is invested in marketing materials, and training materials for customer service activities were often described by staff to be more memorable, easier to apply and more actively reinforced than those used in RG training. To credibly claim 'best practice' in RG interventions, gambling operators need to ensure that the skill and talent applied to RG activity is at least equal to (if not better than) that applied to other parts of the business.

Because of the need for solutions to be adapted and owned by individual businesses, we have resisted putting forward a 'set menu' of RG actions for each operator to 'comply with'. Instead, this report highlights examples of good practice, along with 'lessons to learn from'. In this way, it hopefully provides both flexible solutions but also guidance on key areas to improve. We believe this is a mature way to help communicate ideas – empowering operators to make the decisions that are right for them, rather than directing them. However, without more effort, greater powers may decide on alternative approaches to increasing RG-related performance.

3

Where are we now?



The industry perspective

Throughout the project we were struck by the commitment of operators across all sectors[5] to ensure that gambling remains an enjoyable leisure activity for all. Indeed, the collaborative nature of the project is testament to the increasing fiscal investment, effort and value placed on RG by the industry. Many held the view that promoting 'healthy gambling' was not only good for players, but also – in the long term – would be good for business (retaining customers throughout long 'playing careers', and helping re-cast gambling establishments as positive work/leisure environments, accessible to a wider range of people).

While keen to celebrate what they were currently doing – from hiring staff with the right attitudes, to embedding RG practice into staff roles, delivering RG messages alongside core customer service training, and reviewing RG skills in performance reviews – the working groups also spoke candidly about the range of difficulties they faced.

Despite their best efforts in solving these problems, and a general willingness to share good practice, there was a collective recognition that this project represented only one part of long a journey – as well as an acknowledgement of the modest progress made to date.

This chapter therefore aims to explore existing good practice whilst also highlighting a range of challenges to overcome that were identified as part of this research process.

Existing good practice

It's clear that there have been a lot of changes in the industry around responsible gambling. The best practice review revealed numerous examples of existing practice (over 200) – ranging from well-known campaigns like the 'When The Fun Stops' and the well-publicised development of sophisticated algorithms that are beginning to help operators proactively identify potentially problematic behaviours for online players. In addition, the process uncovered multiple international examples of campaigns, such as 'Bet Regret' and 'Stop the Chase', which need to be acknowledged and considered. The process has also revealed many less well-known initiatives – for example exciting new training programmes, being developed 'behind closed doors', which integrate RG practices into everyday customer service training, and simple tools being developed by customer service staff to help explain important product information.

All of the operators involved throughout the project submitted positive examples of work they were doing within their own businesses – some had many such examples to share. However, there were few examples of operators who had 'universally good' RG practice and more typically, operators had *some* good examples of excellent practice, but progress in other areas was patchy or inconsistent. In addition, working group members agreed that in some key RG activities covered by this review (e.g. Product Information & In Play Messaging), there were few examples of 'really good practice'. Many suggested that they had plans to address some of these issues, but for the time being they had nothing to share.

Operators also confessed that, at times, it was sometimes a struggle for RG activities to be anything more than 'tick box exercises'. Some suggested that this was changing, however it was still clear in primary fieldwork interviews with staff (with staff themselves describing the routine RG training they received as a 'tick box exercise' and some holding even more worrying views about RG interventions being 'pointless' or 'futile').

It's worth also pointing out that the operators involved in the working groups and who supported fieldwork on this project are likely to be some of the most advanced in terms of RG practice (after all, they actively volunteered to take part in a project that was about 'best practice' and were keen to share their examples with us). During the project, we also researched several other operators and the findings were similarly mixed.

5 A range of operators were asked to join the Working Group via the IGRG, Working Group Chairs, or via 'snowballing' from existing participants. It should be noticed that this process is likely to have resulted in some 'self-selection bias' – i.e. the engagement of operators who put themselves forward to sit on a group focussing on 'industry best practice' is unlikely to be representative of the industry overall

Challenges to overcome

Working group members were keen for us to acknowledge in the report that the array of challenges that are limiting the industry's ability to appropriately protect players from harm. While these were not experienced by all operators in our working groups, they were acknowledged as common in the industry and often reinforced during our own research.

Specific observations from those tasked with promoting RG and culture change in their businesses included:

Systemic/structural barriers

- Limitations in interiors and gaming infrastructure (e.g. older machines with no screens), making the challenge of solving 'legacy' design issues seem expensive and difficult
- Lack of operator control over how RG features are designed or embedded within machines, games or software
- Some operators (especially smaller ones and independents) often don't have access to the financial resources or skills available in the bigger operators, making RG a steep learning curve, which can be perceived as expensive and time-consuming
- Operators often have high staff turnover, meaning internal knowledge & practice is easily lost and providing appropriate training to all staff is potentially costly
- The need to be compliant can at times divert resources away from what could potentially be more productive investments in RG

Internal tensions

- Poor leadership around RG and an organisational culture that favours other priorities
- A difficulty in transitioning staff and intervention focus from only 'problem gamblers' to responsible gambling for all players
- Competition and tension with colleagues in marketing and product development, whose 'missions' were sometimes at odds with RG – and which can create confusion for customers (for whom sales and marketing messages dominate)
- Basic RG messages being overwhelmed by prominently-positioned, promotional and sales messages that evidently received greater investment
- Failure of the prioritisation of RG at a policy level to filter into day-to-day frontline practice
- Some frontline staff inadvertently giving out misleading, counter-productive messages – e.g. suggesting that players 'play for longer to increase chances of winning' or advocating certain strategies for 'winning' at random machines
- A lack of resources (time, money & skills) making it hard to implement good ideas effectively
- Lack of evidence of the effectiveness for RG interventions – although it must be noted that a lack of hard evidence does not seem to impede ongoing commitment and innovation in relation to operators' promotional activity[6]
- Focus on superficial actions designed to capture headlines, but which do little to address real issues for players

Industry diversity

- The business and operating models of operators across and within sectors are diverse, with different staffing levels and profit models. This means the case for investment in different RG activities varies considerably and few generalisations can be made about what might work in different contexts
- The staff base and culture of different businesses are variable – meaning that ideas may need significant adapting to work effectively
- Customer profiles between gambling types and across brands also vary – with different kinds of

6 It is also true that the impact of specific interventions and campaigns may be limited, and that attributing outcomes to specific actions can be challenging for evaluators.

behaviour and risk more or less prevalent within certain groups

- The presence of transient and unknown customers – a complicating factor to many RG activities – was also agreed to be highly variable across sectors
- Inconsistent commitment levels to RG undermining the efforts of those at the forefront of good practice – and potentially leading players towards less scrupulous providers
- Different gambling sectors pose different challenges and risks for players. Although many opportunities could work in different settings, there are few 'one size fits all' solutions

The player perspective

The focus of this project was 'mainstream' gamblers. Therefore, all the players we studied did not have gambling problems.[7] Over 95 players and 90 staff were also interviewed using a range of methods including interviews, workshops and ethnography[8].

Despite this, it was clear that many players, as per their own definitions, had intermittently experienced some form of gambling-related harm – whether prolonged visits to gambling establishments during times of stress, missed opportunities, overspending, relationship problems, financial stress, or losing focus on other priorities.

Some individuals often described feeling regret when thinking about previous negative experiences resulting from gambling. Some felt they had 'learned the hard way' how to control their gambling. Others said they have had to remind themselves (or be reminded by partners, friends or family) to keep their gambling under control.[9]

> *"My mum says I hope you're not going too mad on these games, and I have to bite my tongue and say Nah, it's just a bit of fun... I know she'll go ballistic if she knew I was wasting all that money..."*
>
> **Male, 27,**
> Machines

It was common for those we interviewed to maintain a clear distinction between themselves as 'leisure gamblers' and the type of person they deemed to be a 'problem gambler'. From their perspective, the latter were 'addicts', 'highly vulnerable' or 'financially stressed' people. While rationally our respondents could understand and relate their own negative experiences to 'problem gambling', the idea of being classed as a 'problem gambler' was highly stigmatising and something they actively fought against.

> *"Problem gamblers are proper addicts. It's like a junky isn't it – spending all money and time to get their fix"*
>
> **Male, 32,**
> Arcades

This creates a big problem for responsible gambling activities which are perceived by players to be targeted at *problem gamblers* rather than themselves – thus making messages and interventions feel less relevant to them personally.

When exploring current practice in relation to RG, many players had awareness of measures that were in place

7 All players for both depth interviews and focus groups were vetted according to the PGSI scale of problem gambling. Though none of our players were deemed to have a gambling problem prior to meeting with them, it became clear that a number had experienced some form of gambling-related harm over the course of their lifetimes – and that the framing of the questions on the PGSCI scale may actually increase the likelihood that people diminish or downplay their self-reported behaviours. An assessment of the PGSI scale can be found here: https://www.researchgate.net/publication/23172305_Evaluating_the_Problem_Gambling_Severity_Index

8 For further methodological detail, see annex 3 at the end of this report

9 Being a 'true gambler' was defined as someone who had become accustomed to considerable losses and overspend, whilst many players reported in some way diminishing or hiding ('telling white lies') to some extent, the true scale of their gambling activities from their partners or friends.

to support 'problem gamblers', like leaflets or helplines. A minority had noticed and often appreciated measures put in place to help support them set limits – however, the clear majority lacked any awareness of RG initiatives that were in place to specifically support them personally.

Players were open to and receptive to most ideas put forward as part of this project. Some like the fact the industry was thinking more about how to better support players and prevent harm – and some suggested they personally would have benefited from this kind of approach. Others pointed out that they didn't think it fit for operators to take a 'finger pointy' or 'nagging tone', but that offering genuinely useful advice, tips and strategies could help to build trust and loyalty.

Overcoming the challenge of personal relevance is absolutely key to the success of future RG ideas.

"I don't think I've ever seen anything that's been about helping me to avoid making mistakes. Nah. I don't think there's much out there"

Male, 28,
Online Betting

"If my bills are being paid then it's fine – even if it means I don't have money to buy food for the rest of the month, because I know I'll eat at work"

Female, 42,
Bingo

Defining a vision for change

A key aspect of our brief was to help the industry develop a set of principles for Responsible Gambling across different areas of practice. Over the course of the project a number of key principles emerged for how the industry might work together to promote more meaningful, lasting change.

This 'vision' signals an ambitious, determined future: one in which a full range of organisations come together to recognise and support what 'one size fits all' solutions there are, while also developing the flexible solutions needed to fit within specific operating environments.

Proactive & inclusive

Operators need to proactively embed RG practice for all players

All the operator representatives in the working groups agreed on the pressing need to move away from reactive and medical models of 'gambling addiction', towards more inclusive and pre-emptive approaches. In practical terms, this means taking more steps to protect players who are yet to experience any signs of problem behaviours – while also ensuring the tools are in place to support those affected by more significant issues

- Initiatives designed to have impact with all gamblers, not just problem gamblers
- Providing the strategies and tools to protect players and help avoid problems, rather than waiting until they occur

Integrated

RG activities must be integrated with all other business activities

To achieve the goal of being more proactive, operators agreed that RG behaviours need to be encouraged by all business functions and across all customer facing touchpoints. Compliance Managers highlighted the tensions between RG and sales pressures – but felt that looking after customers (and protecting them from harm) was a long-term business strategy that shouldn't be over-shadowed by short-term promotions and marketing campaigns

- Ensuring RG is a high priority and has clear relevance to all business functions and roles
- Addressing conflicting messages and priorities within the business (e.g. between sales targets and RG practice; resolving tensions between 'theatrical gambling myths' and informed choice around games)

Impact-focused

RG activities need to be designed, delivered and assessed with impact on customers in mind

Throughout the research it was evident where operators genuinely cared about the impact of their RG measures – compared with those who were simply 'ticking boxes', or were more interested in superficial solutions. It was felt that operators should judge the success of RG efforts on the level of commitment invested in ensuring impact with customers

- Commitment to ensuring RG activities are designed to have impact with target customers
- Ensuring RG activities are supported with the skills and resources needed to achieve the stated objectives (marketing, design, innovation, player insight, media space etc.)

Empowering

Staff and players must be supported with appropriate RG tools

Operators were keen to ensure staff and players were empowered with tools and techniques that gave them confidence to engage appropriately with RG activities. Staff regularly raised a lack of confidence and fear in delivering RG interventions (and some on our working groups felt this fear was also sometimes shared by operators themselves)

- Ensuring staff feel empowered to act on RG policies (and not fearful of being criticised for making wrong decisions or going against other priorities)
- Having clear progression pathways for staff within RG – with a basic level of expectation from all staff, and opportunities to develop more advanced skills

Continuous improvement

The industry must cultivate a culture of ongoing learning

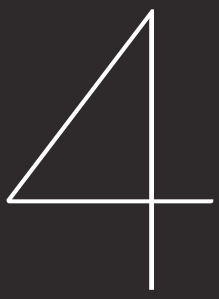
Participants in the working groups recognised that, while much had been achieved, there remained a long way to go in developing effective RG actions and embedding a socially responsible culture within their businesses. They were therefore keen for more knowledge to help them make the right decisions: embracing new technology and research evidence, working out what works and doesn't, and learning from other research. For many, this project represented a commitment to collaboration and innovation which they would like to see continue

- Industry sharing – learning from each other, sharing with those who have less resources and more limited in-house capability
- Ensuring the industry pools resources to encourage more permissive regulation (e.g. greater creativity around how to present product information) and more effective lobbying of machine suppliers
- The project revealed the importance of ensuring RG interventions are tested & developed with feedback from players, for example using 'user-centred' design methods

Summary

In summary, this project has exemplified the commitment of many stakeholders within the gambling industry in advocating for responsible gambling practice and behaviours amongst mainstream players.

This chapter discusses the numerous good practice examples that were identified from within the industry during the research process. Furthermore, through collaboration and dialogue amongst the various stakeholders involved in this project, a new vision for the industry was developed to try and overcome some of the common challenges cited by players, staff and operators.



Three pillars of Responsible Gambling practice

This project was originally commissioned as four separate work streams: Product Information, In-play messaging, Social Responsibility Messaging and Staff Training. During the project, however, it became clear from WG members that publishing four separate reports may not be helpful to operators already overloaded with information. It also became increasingly important that RG interventions should be framed in terms of 'player outcomes' rather than industry practice. As such, we propose a new framework that puts player outcomes at the heart of RG initiatives.

The 'Three Pillars of Responsible Gambling Practice' incorporate most issues and opportunities identified across the project. Each contains insights and recommendations relating to all four of the original work streams, and each has implications across different areas of business operation – including communication, product information, staff interactions and a full range of customer touchpoints.

The following section breaks down the component parts of each of these Pillars: outlining the key challenges associated with each one, the principles by which change needs to occur, and specific ideas for how to achieve it.

Enabling informed choice

Helping players to make more informed decisions about which games they play and how they play them (e.g. how long for, what stake).

Ensuring that players understand key gaming concepts and are able to critically reflect on cues and messages that form part of the game.

RG: Pillar 1

Improving self awareness

Providing appropriate tools and support to ensure that players are able to stay in control whilst gambling making decisions that are in line with their priorities and helping them to avoid regretting their choices.

RG: Pillar 2

Creating supportive environments

Ensuring that all staff and players recognise the value and see the personal relevance of responsible gambling activities.

Ensuring all staff feel confident to deliver and promote responsible gambling practice within and beyond the business.

RG: Pillar 3

Pillar 1: Enabling Informed Choice

Summary of key challenges & principles

Pillar 1 objective – Ensuring all players have a good understanding of the cost, risk and play experience of the games they play

Challenge: Player education messages are hard to understand

Principle: Clear and effective communication about key game features is needed so players can make an informed choice about which games they play and how they play them

- Information must be easily and immediately understandable at the point of purchase/play (e.g. with customers able to easily process the most important messages 'at a glance')
- Players should always be communicated with the simplest way possible – ensuring player understanding is the key priority (over technical accuracy if necessary)
- Messages should be accessible to the broadest range of players (and staff)
- Use of 'industry jargon' needs to be carefully considered. It shouldn't be assumed that players understand key terms or acronyms (e.g. RTP/return to player or 'volatility')
- Care and consideration must be made to the presentation of numerical information, for players who struggle with numeracy (e.g. percentages and ratio)

Challenge: Responsible Gambling information is often recessive, and lacks stand-out and appeal (especially when viewed in contrast with other non-RG information present in gambling environments)

Principle: Operators need to apply at least the same level of communication expertise and creativity to RG communication as they apply to marketing & sales communication

- Information needs to be designed to grab customers' attention and communicate messages effectively, reducing risk of misunderstanding/ misinterpretation
- Consideration should be given to the placement and delivery of information to ensure it is noticed and processed by players (e.g. spaces with higher footfall and/or dwell time)
- Consideration should be given to the 'player journey' and when there are moments that players are more receptive to RG messages (e.g. new player inductions, registration, when people ask questions about the game, complaints, cashing in winnings)

Challenge: Presentation of misinformation within gambling environments can reinforce false beliefs and can confuse players about the facts regarding gambling products

Principle: Operators need to ensure that players fully understand the games they are playing and are able to accurately distinguish between information provided for 'theatrical purposes' and fact-based information

- Operators should review (with a consideration to removing) potentially misleading information within the gambling environment – ensuring 'theatrical information' does not contribute to or reinforce false beliefs
- Operators should review the tools and techniques they use as part of their sales and marketing to ensure that they are not inadvertently encouraging behavioural biases which contribute to misunderstanding

The evidence for greater 'informed choice'[10]

The need for simple risk information

Most experts and operators agree that RG is ultimately the responsibility of the gambler – as a 'rational actor' who is free to make their own decisions and take personal risks.[11] [12] However, there are compelling arguments that to take responsibility for their actions, the gambler must be *fully* informed (i.e. educated) about how the games they play work, the probability of winning, and how to gamble responsibly.[13]

> *"I don't really get the percentages. All I know is that if I play long enough, I'll win"*
>
> **Machine Player,**
> Casino

Gamblers are a diverse population, with a broad range of knowledge and understanding of the games they play. However, the qualitative research conducted for this project suggests that players (even more experienced ones) often lack detailed knowledge about the technical aspects of the games they play. Even the most experienced players can struggle with some of the language used to explain games (e.g. 'return to player' rates and 'volatility'). This difficulty in understanding was felt to be compounded by the often boring and 'mathsy' presentation, which was considered off-putting and difficult to process. Many players we interviewed also described themselves as struggling with maths (1/4 of the working population has 'below functional' numeracy[14]) and were immediately put off by even the sight of a percentage. Even for the more numerical players, evidence shows that knowledge of mathematics and probability does not necessarily protect one against numerical misunderstandings about confusing topics, such as randomness.[15] [16]

Research suggests that simple, uncomplicated presentation of risk information is more rapidly comprehended, and therefore more likely to stimulate behaviour change in players.[17]

Understanding behavioural biases to improve 'informed choice'[18]

Walk into any gambling premises or review the direct marketing from an operator and it's clear a lot of thought has been put into informing the player perception of gambling, with a heavy emphasis on 'winning'. However, according to

10 Additional evidence supporting each of the challenges identified is contained in Annex 2

11 A caveat for this proposition relates to those who have 'impaired control' – either through pathological addiction, medical condition, or other forms of vulnerability – where it is the duty of the gambling provider to have measures in place which protect them from harm.

12 There has been significant debate about the role that information can play in changing the behaviours of players. Though information alone may have a muted impact on behavioural outcomes, it is imperative that operators provide 'sufficient information' for players to make informed 'RG choices'. See the following article for more details: Blaszczynski, A. Ladouceur, R., Nower. L & Shaffer, H. (2008) 'Informed choice and Gambling: Principles for consumer protection' in The Journal of Gambling Business and Economics, 2:1

13 Wohl, M. Gainsbury, S. Stewart, M. and Sztainert, T (2012) Facilitating Responsible Gambling: The Relative Effectiveness of Education-Based Animation and Monetary Limit Setting Pop-up Messages Among Electronic Gaming Machine Players

14 Millions more have below-functional numeracy skills—an estimated 8 million adults and nearly a quarter of the working age population Source: https://fullfact.org/economy/counting-cost-poor-literacy-and-numeracy-skills/)

15 Pelletier and Ladouceur (2007) 'The effect of knowledge of mathematics on gambling behaviours and erroneous perceptions.'

16 Turner et al (2006) The Experience of Gambling and its Role in Problem Gambling

17 Wogalter et al (2002) Research-based guidelines for warning design and evaluation

18 See Annex 2 at the end of this document for behavioural economics concepts

behavioural economic theory, the single-mindedness of this communication could be detrimental to 'enabling informed choice' for many players.

For example, the Availability Heuristic is a well-evidenced psychological bias whereby people have been proven to be more likely to make poor judgements about the probability of an event occurring based on how easily an example or instance of the event comes to mind. This has been well documented in a wide variety of situations – for example, people tend to overestimate how frequently plane crashes occur due to the amount of news coverage they receive, making them more 'available' to come to mind than say, car crashes.[19]

> *"1 in 10 odds would mean that for every pound I spend, if I win I get a tenner. If it was 3 in 10, I would get... erm... actually, I'm not sure"*
>
> **Male, 34,**
> Sports Betting

This effect has been clearly evidenced in relationship to the National Lottery – where large wins draw a huge amount of media attention and are widely publicised, causing them to stand out more in people's minds.[20] There is no reason to think it doesn't apply cross-sector, especially given the careful attention paid to drawing customer attention to wins (with many strategies deployed to accentuate the knowledge of and experience of winning – such as making loud noises, flashing lights, the sound of clattering coins, loud speaker announcements etc.) which effectively make 'knowledge of wins more available'. Importantly for coming up with solutions to improve player outcomes around Pillar 1, the evidence would imply that a reduction in these cues, or a balancing of cues relating to both wins and losses would decrease this effect – and put players more in control of their own decision making.

19 Brinol, P.; Petty, R. E.; Tormala, Z. L. (2006). "The Malleable Meaning of Subjective Ease". Psychological Science. 17 (3): 200–206. doi:10.1111/j.1467-9280.2006.01686.x. ISSN 0956-7976. PMID 16507059

20 Rogers, P., 1998. The cognitive psychology of lottery gambling: A theoretical review. Journal of gambling studies, 14(2), pp.111–134

Another well-known gambling bias is the 'gambler's fallacy[21] and studies have repeatedly argued that a misunderstanding of the notion of randomness underlies many erroneous beliefs about gambling.[22] [23] The evidence also runs a lot wider than just the gambling sector, with hundreds of peer reviewed studies (including well-known evidence from leading behavioural economist Daniel Kahneman.[24]) These inaccurate beliefs were present throughout the qualitative fieldwork for this project, with many players believing, at some level, that they can control or predict outcome – for example, many players told us about 'lucky' or superstitious behaviours or objects, skilful ability (e.g. rolling the dice in a certain way), knowledge (e.g. sports statistics), or betting strategies.

At times, these beliefs or superstitions could be reinforced or validated by communication or staff interaction within the gambling environments. Examples include the use of concepts like 'hot and cold numbers', which encourage players to identify patterns within random play, advertising that encourages players to associate gambling with skill or talent (e.g. the Ladbrokes – 'once is lucky, twice is talent' campaign) or the 'helpful' offer to temporarily reserve a machine to ensure another player cannot immediately 'benefit' from the money put in previously. During our own research, we saw staff sometimes failing to take the opportunity to correct player misunderstanding (or even choosing to reinforce false beliefs – 'you always win when you sit at this table don't you!') which clearly needs to be addressed through training and performance monitoring.

Monaghan and Blaszczynski (2010)[25] found a range of evidence to suggest that increasing awareness of probability amongst gamblers – in particular, improving their understanding of randomness – fosters more sound decision-making. Similarly, Benhsain, Taillefer and Ladouceur (2004)[26] studied the effect of reminding gamblers about the principle of independence in gambling and they discovered that these reminders were associated with fewer erroneous perceptions. Several other cognitive behavioural treatment programs and educational prevention programmes have demonstrated moderate success at educating people about randomness.[27] [28]

> *"You obviously watch to see which machines have paid out. You want one that's got a lot of money in it, but hasn't paid out for a while..."*
>
> **Player,**
> Arcades

21 This bias is rooted in the fact that people often mistakenly believe the outcome of a random event is influenced by the outcome of previous random events in the sequence (a string of Tails make the next outcome more likely to be a Head). It's been demonstrated that subtle cues in the presentation of sequences (e.g. gambles) can increase or decrease people's subjectivity to this bias. Roney and Trick (2003) found that when a gamble was presented as part of a 'block' or 'run' of other gambles, people were much more likely to predict its outcome based on the outcome of those gambles that preceded it - when the gamble was presented as independent from the previous run, this effect was greatly reduced.

22 Ladouceur (2004) Prevention of Problem Gambling: Modifying Misconceptions and Increasing Knowledge Among Canadian Youths

23 Turner (2008) Pathways to pathological gambling: Component analysis of variables related to pathological gambling

24 Kahneman, D., & Tversky, A. (1972). Subjective probability: A judgment of representativeness. Cognitive Psychology, 3, 430 – 454. (The study found that found that when asked to indicate which exact order of outcomes from a coin toss is more likely, HTHHTT or HHHHHH, people reliably choose the former

25 Monaghan and Blaszczynski (2010) Impact of mode of display and message content of responsible gambling signs for electronic gaming machines on regular gamblers

26 Benhsain, Taillefer and Ladouceur (2004) Awareness of independence of events and erroneous perceptions while gambling

27 Ladouceur et al (2003) Group therapy for pathological gamblers: a cognitive approach.

28 Life skills, mathematical reasoning and critical thinking: curriculum for the prevention of problem gambling

This research suggests it's not just players who could do with support to understand the basic concepts and improving player (and staff) understanding and operators need to do more to demonstrate that players understand the facts, before defending cues that have the potential to mislead.

Key insights from our research

Within our own qualitative research, we asked both players and staff questions relating to informed choice. Key findings are summarised here, categorised by different customer touchpoints.

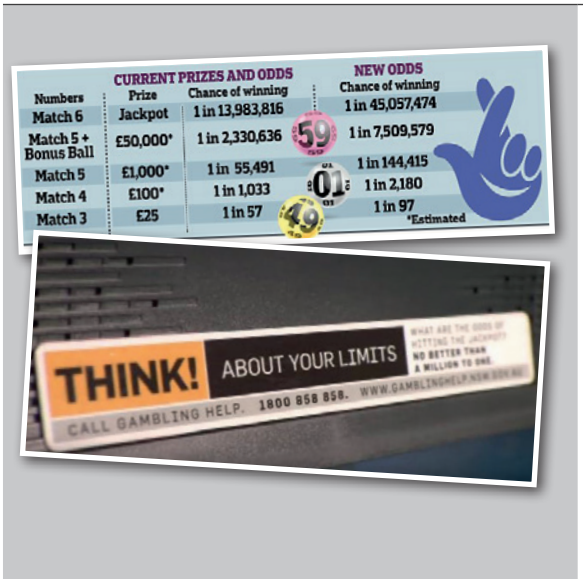
Touchpoints	Challenges to resolve
Information at point of play	■ Players felt product information is hard to find and lacks stand-out, especially relative to other information communicated at the same time ■ Players felt 'vital statistics' (e.g. house edge, return to player) were communicated in a complicated and difficult to understand manner ■ Players felt there was limited attempt to explain or convey numerical concepts in a meaningful way (e.g. through visuals or metaphors) ■ Most information within the gambling environment is framed around 'winning' or 'likelihood of win' – which players felt reinforced 'winning' as a likely outcome
Product reference information	■ Few players felt they would spontaneously engage with detailed product information as currently offered ■ Product information can be perceived to be 'wordy' and 'long', with too much being communicated at once ■ Some felt games lacked transparency regarding how they worked and most players were unaware of additional information that may be available (e.g. on the website)
Other communication and messaging	■ The engaging qualities of marketing messages can make RG messages seem less visually appealing and recessive ■ Misinformation and cues to 'false beliefs' within the gambling environment potentially perpetuate player misunderstanding ■ Introductions to games can fail to highlight the importance of understanding the game/making an informed choice about which games to play
Staff interventions	■ Staff can fail to explain key product differences between games, and have limited tools to communicate them ■ Through their own misunderstanding or carelessness, staff can reinforce misperceptions about games (e.g. 'slot machines are like ticking time bombs') ■ Staff often don't know how to find out more information about games, or where to suggest players look for more information ■ Opportunities are often missed to ensure new customers have a good understanding of the relative risks and costs of play
Environment	■ A wealth of highly appealing visual information (flashing lights, money-orientated messages) means RG messaging must work far harder to be distinctive

Practice to learn from

Creating communications that more effectively educate players about the costs and risks of different games is challenging, and few specific examples of 'best practice' arose from our working groups. However, a range of ideas and inspiration emerged with the help of the working groups.

Better communicating key concepts – including 'chance of winning' & 'cost of play'

Currently, the industry is obliged to display product information that is 'compliant'. However, players felt that this 'compliant' information was often meaningless or presented in a way that was illegible or difficult to understand. They struggled to understand 'industry jargon' and associated mathematical concepts (e.g. 'house edge', 'return to player' rates & 'volatility'). Although such better information design is critical to enabling informed choice.

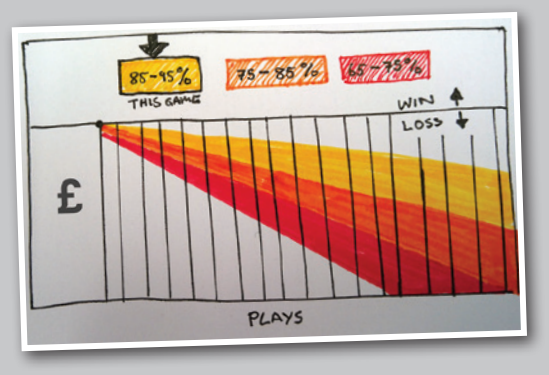


Communicating risk

- When asked about 'risk' players often asked for such information to be presented as a '1 in X' chance of winning certain jackpots
  - *Example (left): A newspaper reporting on odds changes to the National Lottery and a sticker describing the chances of winning the jackpot as 'no better than a million to one'*
- To players, information presented like this would aid comparability across games and help them relate to odds in 'real' terms – especially if presented at the same time (e.g. comparing likelihood of win against being struck by lightning, being eaten by a shark, needing to go to hospital after a pogo stick accident, or dating a millionaire)

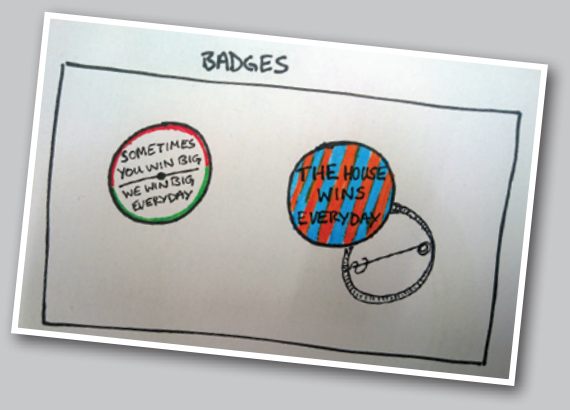
Distinguishing average cost of play from winning

- Players recognised that they paid money to gamble, but often could not provide any real insight into which games 'cost them more'
- In the absence of any industry examples, this quick sketch illustrates one potential method of distinguishing the average cost of play from the concept of 'winning'.
- Initial player feedback was very positive as players related the idea to familiar products/services they also bought in this way (e.g. suntan beds or time at the golf range)



Illustrating relative cost of play over time

- In the absence of any industry examples, this quick sketch was an attempt to illustrate relative cost of play over time
- Of a range of more 'mathsy' visuals, this was the most preferred for its simplicity and straight lines (more 'accurate' representations of cost of play were rejected as confusing)
- Indeed, players felt even this simplified diagram could be made more clear – with suggestions that there should only one line rather than three 'areas', and that it needed a simple explainer in words
- When encouraged to engage with it, the visual depiction of information was perceived to be clearer than the equivalent communicated in percentages – however feedback emphasised just how much some players struggled with more mathematical concepts



Emphasising profit motives & 'house edge'

- Operators within the working groups were keen to point out gambling is a leisure activity and assumed that players were aware that they would lose more often than they would win
- While most players did rationally know this, sometimes in the heat of the moment they felt they could 'beat the system'
- This idea, developed during concept testing is an example of more open and transparent messaging that clearly emphasises 'house edge' and the profit motive of gambling companies
- Unsurprisingly, it wasn't popular with operators and wasn't tested with players (although from other feedback players gave us, we imagine they would appreciate the honesty and transparency)

Emphasising 'chances of losing'

- As already discussed, the availability heuristic means that players may overestimate their likelihood of winning, simply by how well publicised winning is within gambling environments and how memorable wins are
- Infographics that helped to re-balance these messages were appreciated by players as a reminder. However, some players also found the realisation that most people lost, or that they would inevitably lose over time, deeply uncomfortable – suggesting it challenged their core beliefs
- Understandably, operators often found the idea of framing 'vital statistics' in terms of 'chances of losing' uncomfortable

SlotGuru

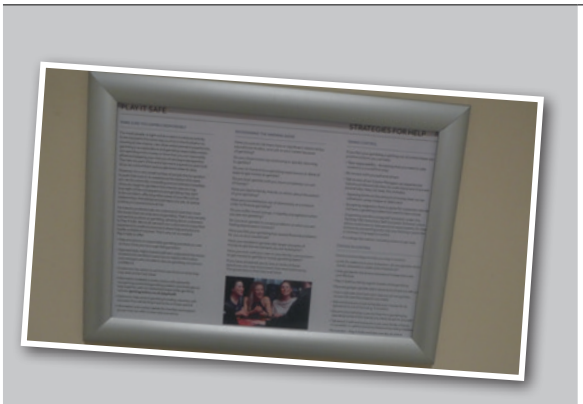
- SlotGuru is an app which, according to publicity materials, is 'designed with social responsibility in mind'
- It purports to be designed to be both beneficial to players in helping them find games they'll enjoy, but also provides additional space to help communicate key features of games
- Currently being trialled in some venues, there is limited evidence of effectiveness so far

Categorisation of machines

- Some information that is currently communicated prominently on games was felt to have little informational value to customers
- *Example: the categorisation of gaming machines is often displayed clearly – but while some players had a vague idea of what it signalled, it meant little to most people.*

More visual communication of key concepts

Within the submitted examples of current practice, there were few attempts to present information more creatively than as words and numbers on a page. Operators on the working groups also acknowledged that much product information is communicated in a 'flat', 'uncreative' manner (especially when contrasted with other customer facing materials). Few felt that this information was 'read' by many players – effectively rendering it a 'tick box' exercise, with a focus on 'technical accuracy' ahead of player understanding.



Comprehensive, 'text heavy' communication

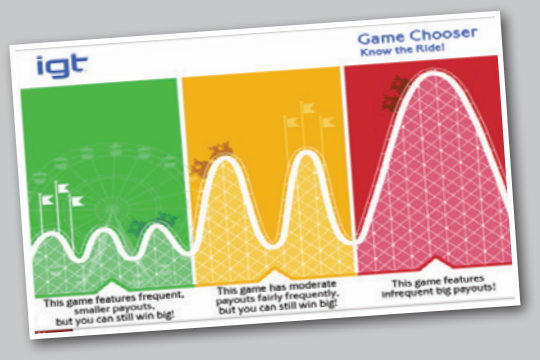
- This example is from the casino sector, but was illustrative of a range of materials gathered during the project
- The leaflet is comprehensive and technically accurate, but does little to improve player understanding beyond communicating the key information
- Players acknowledged that it was useful to have all the reference information in one place. However, as currently designed, the 'text-heavy' style was felt to be off-putting and overwhelming

Examples from the healthcare sector

- Much research has recently been done to communicate health information to patients more effectively (including communicating risk, and enabling informed choice)
- When tested, players saw these tools as an improvement on existing forms of communication – but further explanation was often required for interpretation to be meaningful
- *More information about numerical illiteracy can be found at the National Numeracy Challenge (https://www.nationalnumeracy.org.uk/) and health communication can be found via a number of research centres including http://www.pcori.org/*

Traffic light systems

- 'Traffic light' systems were regularly mentioned by operators for both their simplicity and their difficulty of application
- Players also highlighted how this system could be beneficial if it clearly communicated relevant and valuable concepts
- However, there's a risk that using green could mistakenly imply there is no associated risk with certain games – and this needs to balanced with the benefits of such clear communication mechanisms



IGT Game Chooser

- One of the only examples we found of the industry attempting to communicate information more visually was the IGT 'Game Chooser' – which uses a roller coaster metaphor to illustrate volatility
- While in many ways 'ahead of the curve', testing showed that players often misinterpreted what the diagram was representing
- For some respondents, the 'rollercoaster' was a metaphor for excitement. Therefore, the red segment, with the highest 'hill', was the 'most thrilling' and appealing – even though their quest for 'thrilling' gameplay didn't necessarily equate to high volatility games
- The distribution of the 'hills' also led many players to misunderstand the potential frequency of wins – with a 'big win' on the red curve made to appear as 'evenly distributed' or as likely as the 'hills' in the other segments – making it more appealing (i.e. why not play the game with the equally likely 'big win' vs. a small win?)
- The problems with this diagram emphasises the importance of testing communications with players to ensure meaning is accurately conveyed – and whilst non-numerical depictions of volatility might be helpful, care must to taken to ensure that they do not mislead

Other ways of visualising cost of play & volatility

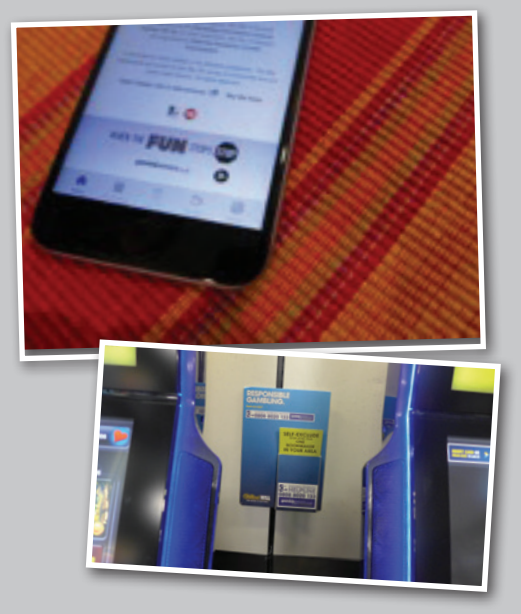
- During the concept testing phase, we devised some 'quick sketch stimulus' that showed some alternative ways of visualising 'cost of play' and volatility combined
- When shown to players, the visual and colourful way of communicating the information was liked, but they struggled with the graphs and often interpreted the information literally (e.g. seven losses before a win), meaning that the information could reinforce misunderstandings about how the game worked
- Again, these findings illustrating the reliance on 'mathsy' forms of communication may not necessarily improve player understanding

Prominence and placement of RG info

Observational fieldwork (including ethnography and player shadowing) revealed that few players appear to notice or engage with RG information (leaflets, posters etc.). This could be a result of poor placement (e.g. in corners/poorly lit areas), or because they were less visually appealing and engaging *in contrast to promotional messages*.

Size, legibility & spacing

- In some circumstances (due to historic game design), the spaces for RG information are often very small – so a lot of information is 'crammed' into a small space
- However, in more modern and flexible communication environments (e.g. websites and mobile apps), some players felt that small text was used 'deliberately' to 'hide' terms and conditions and other important information.
- For players, the tiny text was often illegible and there were few reasons their attention would be drawn to it
- This was especially true when such information was set against far more attractively designed and tempting offers & game information
- Players suggested to us that rather than cram lots of information into a tiny space – it would be better to communicate one or two messages well



Placement in hard-to-see places

- In general, players struggled to find any RG information about the games they played online and in app when asked to, and relevant information was often hidden in click throughs
- Often important RG information was placed off screen or out of immediate eye-line – i.e. by having to scroll down to the bottom of the page in an app or screen
- In venues, often RG messages were in poorly illuminated areas or consigned to 'dark corners' of venues or around corners. This was in contrast with other messaging in on and offline gambling environments – so much of it well-lit, brightly coloured and often dynamically displayed
- Clearly, locating information in such hard-to-see places reduces the likelihood that players will engage with the information

Proactive staff communication

- Staff regularly and routinely interact with players (e.g. mods in online chatrooms, staff registering new players in bingo halls or casinos) and these moments present an important opportunity to help players understand responsible gambling features & to promote 'healthy gambling messages'
- However, when witnessed these kinds of interactions were often down to the individual staff members, and there were few structural encouragements for staff to better support player understanding
- Staff interactions are a potentially important way of communicating key RG concepts to players

Learning from gambling marketing

- Gambling operators often send players marketing information via push notification, emails or text
- Such messages are often engaging, highly visual and appeal to the players by offering incentives for free plays/free bets
- Rather than waiting for the player to seek out information, operators could encourage players to engage with RG information by adopting similar strategies to those already in use by their marketing colleagues

Signposting to further information

Improving player motivation to engage with product information will help to take pressure off operators. However, it seems that very little thought has gone into how to make product information more appealing and motivating to players.

Appeal & consistency

- Some players questioned whether, as currently designed, they would ever click on these 'info' and 'responsible gambling information' buttons
- Signposting takes different forms in different sites and this can create confusion about what information players can expect, and uncertainty about its value

Icons, buttons and flags

- In the concept testing phase, we developed a range of quick sketches to illustrate different possible strategies for 'icons' which signpost players to product information (all very simply illustrated here for initial testing purposes only)
- Unsurprisingly, the icons that players perceived would 'pique their interest' the most were those which offered 'incentives' for engagement (e.g. 'bonus' or 'tips and tricks')
- Standardising a more typical 'info' button was felt to have value, but was less motivating or interesting – and many felt that they wouldn't be bothered to click on it
- The 'Responsible Raccoon' character (designed to challenge assumptions about what RG icons could look like) was surprisingly popular with bingo and arcade players, and was an unthreatening and fun way to get people to engage with information (in direct contrast to most other RG information). Some players felt it was a bit childish and 'not for them'
- These research findings suggest that there is a lot of scope for more creative ways of engaging players with RG information – few of which are currently being attempted

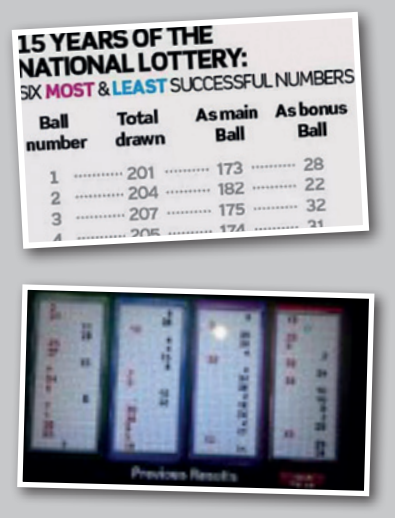
GameSense Information Centre

- Beyond icons, bolder and more engaging signposting could be used in both physical environments and online to motivate players to access relevant information
- One international example is GameSense Info Centres – interactive kiosks located on or near the gaming floor in some Canadian casinos and community gaming centres
- At these kiosks, customers can talk to trained advisors who will explain how games work, the odds of winning and losing, and gambling myths
- Staff can also offer confidential support
- *More information: http://gamesense.bclc.com/tools-and-resources/gamesense-info-centres/find-gamesense-info-centres.html*

Avoiding misleading information

'Fake news' is a big contemporary issue, with concern at the highest levels of government about the spread of deliberate misinformation. However, when accompanying players into a range of gambling environments it became clear that sometimes players readily took 'theatrical cues' at face value – either misinforming them or reinforcing existing misconceptions about the nature of games.

Some players showed awareness that this information was 'for fun'. But given existing evidence which shows that players struggle with the concept of randomness, clearer distinctions could still be made between fact and fiction.



Attributing significance to 'theatrical' cues

- Players misinterpret cues within the gambling environment that encourage them to see patterns of play rather than the underlying randomness
- These 'theatrical' cues often conflict with product information and can impair a player's ability to make an informed choice about play
- The most common example we found was 'hot and cold numbers', used widely across many gambling sectors and game types
- Many players had developed strategies that drew on this information – and while technically a fun part of the playing experience, it seemed likely that having 'officially displayed versions of this information was reinforcing false beliefs

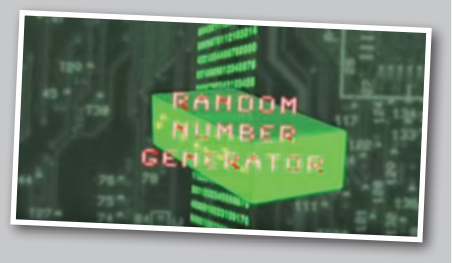
Misleading phrasing

- For some players, even technically accurate information could be misleading
- For example, the message on the left reads 'This game is compensated and may be influenced by previous play'
- For some players, this reinforced their belief that the odds of winning increase the longer you play[29]
- While the message is accurate, this example perfectly illustrates how players, without knowledge to the contrary, can reinforce false beliefs
- It also highlights the importance of testing RG messages with players to avoid misunderstandings

29 While ostensibly 'true' that it is more likely that a person will have a single win the longer that they play, there was a common misapprehension that spins were linked through time rather than random – i.e. that the odds of winning become more favourable with every spin or roll of the dice.

Disclaimers for misleading information

- When it comes to misleading information, the obvious answer is to simply remove it from display.
- However, we didn't have this option during our concept testing so we developed a concept around introducing 'disclaimers' which would be shown on or near 'theatrical information'
- This quickly drawn sketch, illustrates one such disclaimer that was popular with players
- The image depicts the 'bullsh*t bull' which players felt would stand out and effectively communication the misleading nature of information
- During research, some players demanded to know which messages within the gambling environment had genuine informational value and which were misleading – suggesting that players may be struggling to tell the difference
- Some players went as far as to say that they felt that there should be no misinformation in gambling environments as it was 'unfair' to mislead players (or even that operators should be fined for having misinformation present)



Step-by-step guides

- A minority of players had quite strong 'conspiracy theory' style beliefs about unfair practice in the gambling industry, and various theories about how games had been 'tampered with' to advantage the house
- Accompanying this narrative was a sense of injustice – with the individual feeling that they had lost more times than they should have (perhaps another example of the over-emphasis of winning 'availability heuristic' in action?)
- Working group members also reported challenges in explaining key concepts to these players – especially when calling the customer service teams upset or in 'complaining mode'
- The challenges of explaining randomness (especially over the phone or by staff who also struggled to understand the terms) highlighted a need for tools to help explain hard-to-grasp concepts to players in a more 'step-by-step' manner
- This would benefit players – who can make informed decisions about which games to play, and to remind them if they miss or forget this information (but also take pressure off staff to explain such complicated concepts)
  - *Example: 'Gaming Machine Facts and Myths' was created in Australia to do exactly this (https://www.youtube.com/watch?v=6NZuyfpQTms)*

Pillar 2: Improving Self-Awareness

Summary of key challenges & principles

Pillar 2 objective: To help players stay in control and effectively monitor the financial and social implications of gambling decisions

Challenge: Players lack strategies and tools to control their gambling and prevent gambling related harm

Principle: Whilst players often understand the 'basic advice' around gambling responsibly (e.g. stay in control), there is a need for clear, appealing and easily applicable tools & techniques that players can adopt into their normal game play, and which help to protect them from harm

- Supportive messages must go beyond obvious advice, to provide clear ideas for how players can practically protect themselves from harm
- Players must be enabled, and reminded to actively use knowledge about how to stay in control during gambling sessions (and when in a 'hot state')
- Tools must be easy to find and framed in a positive way that is suitable for 'average players' (e.g. not setting the default limit at a level that would be unrealistic for many players)

Challenge: Players lack insight into how much time and money they've invested in gambling and therefore the harms that they may experience as a consequence.

Principle: Operators need to provide players with information that has high personal information value and prompts timely reflection

- Players need support to develop better awareness of how much they spend over time, and ensure they stay aware of their total wins/losses
- Information needs to be provided in a clear & easy to access manner
- Ideally players should be able to track trends in their playing behaviour over time & across different types of gambling (ideally across gambling providers and sectors)
- Where such information isn't available (e.g. in more anonymous gambling environments) operators need to be investing in other techniques to encourage player self-awareness – for example staff interventions and well-designed communication

Challenge: Players react badly to interventions designed to minimise harm that they find nagging, patronising or paternalistic

Principle: The tone of messaging must be carefully considered – empowering players to make their own decisions

- Players need to be given appropriate opportunities to reflect on their patterns of game play
- Careful consideration should be given to behavioural and customer service tools that could be used to create 'natural' and 'positive' interrupts in gaming
- Messages need to strike the right balance between being helpful and appropriately challenging, without being overly negative or cautionary
- Operators must demonstrate an awareness that players see most RG activities as aimed at 'someone else' – taking clear steps to increase personal relevance and value in such messages

The evidence for 'improving self-awareness'

The challenge of 'getting carried away'

Players in diverse sectors sometimes describe a sense of 'dissociation' and narrowing of focus when gambling. For many, this chance to 'switch off' is one of the reasons they enjoy gambling as a pastime. But while 'the zone' may be enjoyable, significant research evidence shows that individuals have less self-awareness of behaviour and more disordered thinking when stimulated through gambling. A consequence can be the erosion of rational decision-making.

Players who took part in both interviews and focus groups recognised that they could get carried away when in this state, perhaps making decisions they later regretted. Examples of the latter included spending more money than intended, not holding onto winnings received, or playing for longer than they wanted to – often at the expense of more productive, important or rewarding activities they had planned. Many said they did have some sort of formal or informal budget for gambling (even if only notional), and agreed overspending could be problematic and concerning (some stated that even overspending by a small amount could cause them significant problems). Despite setting their own informal limits, players recognised they often lacked willpower to resist the 'temptations' on offer and stick within their 'budget'.

> *'When you're in the middle of a game – I call it 'tilt juice'. It's like suddenly you get into a moment of inhumanity where nothing, and no one, is going to stop you playing – even though you're –making bad decisions."*
>
> **Online Casino player**

While players had awareness and control of their behaviour and vulnerabilities from the rational vantage point of a 'cold state' (i.e. when not gambling, and prompted to reflect on their own behaviour), they freely admitted that their judgement and recognition of their behaviours within the 'hot state' (when gambling) caused them to lose control of their own behaviours.

The need for helpful prompts targeted at the average player

There are ongoing debates about the effectiveness of 'educational' and 'public information' campaigns to inform individuals about the need to be self-aware or take action to minimise harm – both within the gambling sector, and more generally in public health and other fields pertaining to behaviour change.[30] Previous evidence and operators raise concerns about the risks of 'negatively interrupting' players during play – with a worry that negative reactions could increase the likelihood of players disregarding the information. From this research, players felt that, while they were typically in gambling environments to enjoy themselves, a *friendly reminder* to 'stay on track' wouldn't necessarily be annoying or unhelpful if delivered in the right way.

> *"You kind of both do and don't want a picture of your wife there, nag nag nagging away at you and reminding you of what else you should be doing It would be good, but it also would be very bad"*
>
> **Player,**
> Betting Shop

30 Blaszczynski, A., Parke, A., Parke, J. & Rigby, J. (2014) 'Operator-based approaches to harm minimisation in gambling: Summary, review and future directions', for Gamble Aware (formerly Responsible Gambling Trust)

Many players, when probed, felt that there was an absence of this kind of 'helpful' information in most gambling environments. When they had noticed RG communication, it was typically associated with 'problem gamblers' (e.g. 'what to do if you think you have a problem' or 'helplines to call') which they didn't relate to. The SENET-funded Future Thinking report clearly found that players do not relate to current social responsibility messaging precisely because they actively distance themselves from the problem gambling category.[31] Those who had seen other messages (e.g. 'When the Fun Stops, Stop' in betting shops) were typically supportive in principle – although for the vast majority of regular gamblers this message has now become part of the 'background wallpaper' of different venues, perhaps suggesting that such information needs to change frequently to maintain players' attention.

The need for both autonomy and carefully considered ethical behavioural/social nudges

In general, there is strong evidence that messages and prompts promoting 'autonomous decision-making' are more effective than paternalistic 'warnings' or 'interventions'. Much research has also been conducted into techniques to improve self-awareness via pre-commitment tools and personalised updates with a 'high personal informational value' (e.g. time summaries, time alerts, spend summaries or spend alerts).

> *"I used to be angry with myself for an hour, asking myself, why did you do that/what did that achieve?"*
>
> **Male, 27,**
> Scratch cards, online casino, sports betting

In other sectors, there is a growing evidence base that behavioural or 'nudge' strategies could complement more targeted approaches, and Monaghan and Blaszczynski (2010) note that behavioural strategies could be 'low cost' and 'complementary' to personalised player notifications. These kinds of interventions are regarded as particularly effective for situations where individuals are in a more irrational 'hot state' – less in control of their own behaviour.

While these behavioural nudges can be used for positive impact, they can also be used in harmful ways. One potential illustration of this, is when asked about their experience of limit-setting options, some players participating in our research spontaneously flagged that they felt the default settings were too high. When we investigated, examples of high default limits included one operator presenting the default limit as £99,999. This was not a unique example and self-limiting or pre-commitment options from a range of operators were often set far above what respondents would usually want to gamble, or would see as a 'normal' amount to bet.

This is a particularly concerning finding given that 'anchoring' is an extensively documented cognitive bias[32] that describes the common tendency of people to be heavily influenced by the presence of previously presented information offered (the 'anchor') when making decisions. Once an anchor is set, other judgments are made by adjusting away from that anchor, and there is a bias toward interpreting other information around the anchor. Anchoring techniques are widely used in sales negotiations, to encourage individuals to pay a higher place. If deliberate, setting the spend limits this high within the context of a RG intervention, could represent a cynical (and perhaps even unethical)

31 Future Thinking (2016) 'Project Time: Responsible Gambling Message Development', for SENET group

32 For example, a study by Strack et al (1997) found that when people were asked whether Mahatma Gandhi died before or after age 9, or before or after age 140 (when clearly neither of these anchors can be correct) both groups still guessed significantly differently (average age of 50 vs. average age of 67)

attempt to undermine their own social responsibility intervention. If unintentional, it is a signal of poor design skills and inattention to detail. Either way, signalling a lack of commitment to Responsible Gambling.

Key insights from our research

A summary of the key issues relating to 'improving self-awareness' from our own research (and wider knowledge base) can be found below. More information can be found in the evidence summary in the Annex.

Touchpoints	Challenges to resolve
At point of play	■ Money, and therefore the consequence of overspending, is often intangible within gambling environments (e.g. using debit/credit cards, pre-loaded credit, chips) – except when players win, at which point cues are used to maximise tangibility ■ The speed, repetitiveness and pace of games can enhance feelings of dissociation and discourage self-reflection/self-awareness ■ Players struggle to keep track of time or cumulative financial spend, meaning they are often unaware of how much money they are spending on gambling. Often this realisation doesn't hit home until they are reminded by a friend or family member and feel guilty about the spend – or if they have used money for gambling which they had intended to set aside for something else ■ Some players rejected the ideas of setting 'formal limits' as they felt this was aimed at 'problem gamblers' ■ At the same time, however, they admitted that 'self-managing' can mean they go over their limit – which can in turn cause problems ■ Players often described information presented as lacking personal relevance. They often weren't aware of – or motivated to go into – their account settings to find out information about their spend over time. Some imagined this would be an 'uncomfortable' experience, but one they probably should be 'forced' to do
Reference information	■ Wider messaging often doesn't discuss or challenge player perceptions about the need for self-awareness or help players to identify strategies to stay in control ■ Other reference information reinforced perceptions that responsible gambling was purposefully directed at problem gamblers only. ■ Even subtle cues could mislead players about 'who' the messages were targeted at – for example, providing telephone numbers for 'problem gambling' helplines

Communication and information	■ When players had noticed RG messages they flagged that they could quickly become part of the 'background wallpaper' of venues and 'easy to ignore' ■ Whilst campaigns like 'When the Fun Stops' represent significant progress in making communication more engaging, players also felt that they didn't change frequently enough to have a long-lasting impact ■ Where messages do exist to educate players about strategies to 'stay in control', they're often at a high level, and not backed up with practical tips, advice or tools on how to achieve it (for example, players told us that 'not spending more money than you can afford' was obvious, the challenge was how to apply this information when in 'playing mode') ■ Many messages are easily rejected by players as being targeted at 'problem gamblers'
Staff	■ Typically, staff admitted that they only made RG 'interventions' when players were exhibiting problematic behaviours, rather than proactively pre-empting problems for all players ■ Some staff admitted they feel uncomfortable approaching players and had been warned about 'bad reactions' from customers when speaking to them about 'responsible gambling'. (NB. Whilst some progress has been made in building staff confidence, there is still a lot more to do) ■ Players flagged that too much staff interaction could be annoying when enjoying their leisure time – although in certain circumstances players felt staff engagement and concern to be positive (e.g. some customers reported having good relationships with staff in venues that they frequented)
Environment	■ There is a general lack of 'real world' anchors in the gambling environment (e.g. natural light, clocks) ■ The sound of money clinking when winning encourages players to remember wins over spend – compounded by the availability, on site, of cash machines and ways of spending money ■ Players often had little insight into the techniques used in gambling environments to encourage dissociation (e.g. lack of windows, no clocks)

Practice to learn from

'Self-awareness' promoting activities are typically associated with in-play messaging. This can limit their relevance and application to machines and online games – whereas the operators who contributed to this project agreed that a range of activities and messages could contribute to player self-awareness. These include in-play messaging, but also extend to wider advertising and communication with players, as well as staff interventions.

> *"They have these messages around to help people who have spent their life savings and stuff. It's really good – you know – ensuring they know where they can go and get help"*
>
> **Female,**
> Casino player

Impactful responsible gambling messaging (Senet funded)

RG messaging via posters and screens was common in the venues of the operators taking part in the project, as well as others we visited. The quality of this messaging was, however, variable.

There was often a stark contrast between messaging to promote gambling and communications to promote *responsible* gambling – with RG messages often lacking stand-out when compared to marketing messaging or relegated to 'out of the way' locations.

Research commissioned by Senet (conducted by Future Thinking), along with our research, reinforces that 'mainstream' players do not identify at all with 'problem gamblers'. Therefore, any messaging that is interpreted as being aimed at the 'problem gambler' is ignored as irrelevant.

> *"It's all fear mongering. I know I'm never going to spend all my savings and lose my family over gambling"*
>
> **Male,**
> Sports better

When forced to engage with it, players do recognise the importance of having information to signpost problem gamblers to support; however, the 'average' player is not looking for professional support.[33]

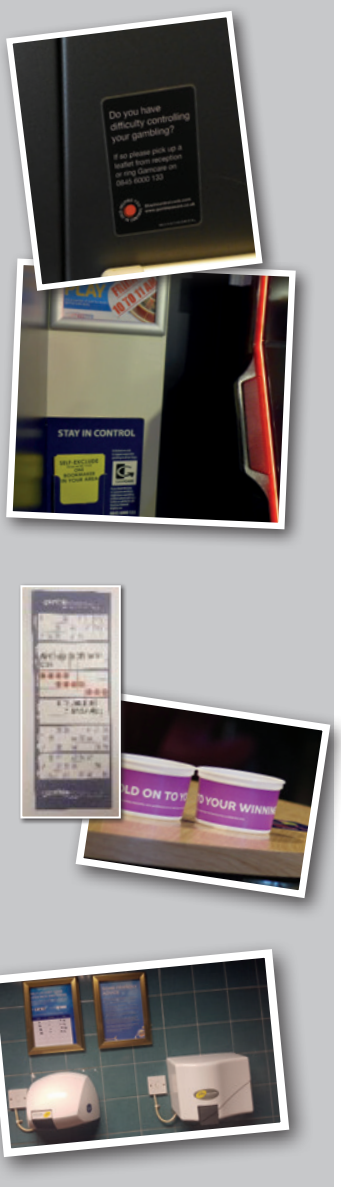
33 This said, many players we studied had experienced problems as a result of their gambling – and arguably every person currently experiencing a significant problem would once have said the same about not being likely to develop difficulties.

Delivering messages effectively – and keeping things fresh

- Many players had seen 'When the Fun Stops' – not just those who went into betting shops or bet online
- Our research reinforced previous evidence about the appeal and impact of the simple message – alerting players to a behaviour they needed to watch out for, and providing clear instruction about what to do if they experienced it
- The high awareness of the campaign highlights the potential for messages that are part of a widespread, joined-up campaign
- At the same time, regular players also highlighted that if the message didn't change then it could easily blend into the background
- Additionally, venue visits showed many examples of careless delivery – with posters being cut off half way through the message or being covered up entirely

Learning from gambling promotion

- Advertising and marketing materials designed to promote gambling are typically far more creative and aspirational in design, messaging and tone than their RG equivalents – for example, using celebrities as brand ambassadors and flattering players for their 'talent'/'skill'
- In our audit of RG communications, there was a tendency to communicate multiple messages at the same time – e.g. a large amount of information contained within a single leaflet
- There are considerable opportunities for the integration of the skills and approaches used in gambling advertising to better promote responsible gambling messages



Positioning and prominence

- Across different venues and sectors, players often found social responsibility messaging difficult to find – indeed, some regular players reported never having seen any at all!
- During site visits, it was observed that many RG messages are displayed on the sides of machines and in poorly illuminated corners – or that they were often so small as to be barely legible and difficult to decipher
- In some venues, more consideration had been given to the placement of information – situating it in locations with higher dwell times and spaces with increased footfall (e.g. by the hand driers in the ladies' toilets)
- However, it was rare for RG messages to hold premium media space, either on or offline
- There were some examples of creative ways to design and apply RG messages to catch player's attention
  - *Examples: a cup for coins with 'hold onto your winnings' printed on the side, plus a link to the GambleAware website; RG messages designed as a bingo slip and placed on all the tables within a venue*
- However, these kinds of examples were few and far between and often the RG messages within them could be strengthened

Attribution and 'calls to action'

- During our research, players highlighted that the perceived author or branding of messaging could change the tone and perceived target audience
- For example, many players associated messages from Gamcare with Gamblers Anonymous, and strongly felt these were aimed at people with well-developed problems
  - Similarly, if a message's main 'call to action' was a helpline or signpost to professional advice, this too could anchor messages towards problem gamblers
- The Gamble Aware brand was polarising, with some perceiving it as a 'helpful advisor' (akin to DrinkAware), and others more firmly associating it with problem gambling
- Operators were also felt to have a potentially strong, credible voice in communicating with players about RG
  - Players often trusted and felt loyal towards the operator they played with – and liked the kinds of messages they put out
  - This suggests that if RG messages could be communicated as effectively as marketing messages – and in a similar tone – they may have more impact
  - Equally, some felt that RG messages communicated by operators could feel disingenuous – perhaps further illustrating the lack of cut-through to average players of current RG activities
- Some players suggested that messages that feel more 'peer-to-peer' could increase credibility and personal relevance
- Overall, care must be taken to ensure the perceived author of messages is both credible and motivating to players

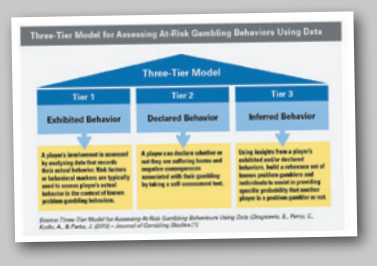
Testing and developing new messaging

- A whole range of new messages were funded jointly by Senet Group & Gamble Aware (and developed by creative agency 18 Feet, based on Future Thinking research)
- Overall, five routes were tested. All routes had merit, with each taking a different approach to engaging players, in terms of tone and communication style (The latest version of the creative routes is available in Annex 8)
- With support from operators (Coral, Rank, Praesepe, Gala), the testing process highlighted just how challenging it is to develop messages that strike the right tone and provide players with useful, constructive information which they don't 'other' or assume is directed at problem gamblers
- Even though the creative routes were not perfect several key insights emerged:
  - Players felt there was a role for both more serious and more light-hearted/friendly messages
  - To some degree, players were already aware of high-level, common sense information relating to avoiding problems (e.g. don't spend more than you can afford). Repeating these messages could feel like just re-stating the obvious
  - When in 'playing mode', players needed messages to be communicated in simple terms – avoiding complicated metaphors or abstract terminology that might take additional time to process (and may mean they don't absorb the message, or interpret it wrongly)
  - Players felt they would benefit from messages containing more practical tips for how to integrate 'healthy gambling behaviour' into their approach
  - Of the routes proposed by 18feet, those with a lighter and more friendly tone were perceived to have more personal relevance to mainstream players (e.g. 'Just a heads up' and 'Ask yourself')
  - Messages that made players feel clever – or that recognised what they already knew – could help messages feel less patronising (e.g. 'Gone over your spend limit?' recognises players may have set a limit)
- Above all, the testing process clearly demonstrated the importance of sense-checking and developing messages with players
  - As a result of player feedback, all the creative work in this report could be improved in the next phase of creative development

[Detail of all messages and player feedback can be found in the 'Concept Testing Appendix of accompanying Evidence Summary']

Player monitoring and identification

Some operators were implementing a range of measures to better identify players showing signs of problems, with the goal of earlier intervention and more effective use of staff resources.



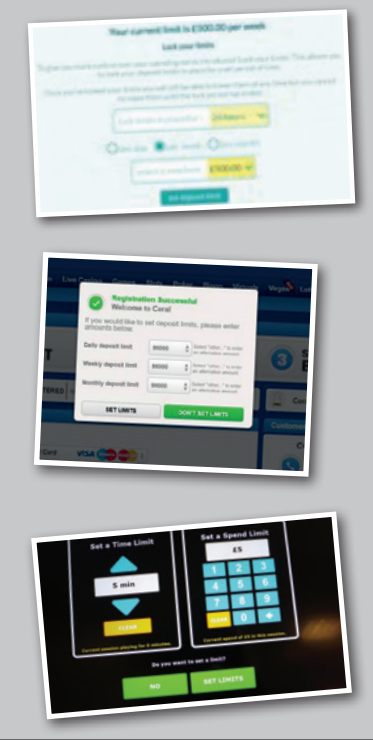
Big data

- Significant work is currently going on both theoretically by academics and within gambling businesses to use 'big data' to help identify problem gambling and enable earlier intervention
  - *Examples: some online providers have developed markers for early intervention where players accrue grades based on the number of trigger behaviours they meet. Triggers might include behaviours such as cancelling pending withdrawals of cash, chasing losses, increasing stake sizes etc. Once they have enough points, this will trigger a staff interaction with the player (either via email or call)*
- These approaches considerably strengthen the case for more universal 'account based play' across different operators and sectors
- There is a lack of evidence in how effective these algorithms are for early intervention – however, as part of balanced RG strategy they seem like a promising addition to the toolkit
- One crucial problem, is that it is not always clear what should happen once an 'intervention' had been triggered. For example, what should the intervention consist of and how best can the operator meaningfully help
- This problem is not unique to algorithm based interventions, but also existed in other sectors – including staff intervention (see Pillar 3: Encouraging Supportive Environments)

*Origination Studio, Surveillance Room, Spring 4 edition

Remote tracking of player behaviour

- Some operators had developed tools to help staff track individual player behaviour remotely within venues (e.g. from behind a cashier counter or over CCTV), enabling them to target face-to-face interactions more carefully
  - *Examples: An automated alert system that popped up on a staff terminal and promoted a RG interaction; and a CCTV system monitored by security staff trained in RG observations, which meant they could remotely direct staff attention to players who had been playing for time periods beyond operator limits*
- For some operators, there was an opportunity to triangulate this information with loyalty scheme/membership data to provide a more accurate historical overview of player behaviour
- However, during observational research it was unclear how often these tools were being used, with staff often busy doing other things – rather than monitoring the cameras or any automatically generated player alerts
- It may sound obvious, but to be effective, remote tracking systems need to be staffed and monitored, with a clear intent to act and repercussions if alerts are not dealt with appropriately



Pre-commitment measures

- There were some examples of 'pre-commitment' from a range of operators, including time & financial limit setting
- In our research, players were generally receptive to these measures – appreciating being empowered with reminders, rather than 'told what to do'
  - *For example: one online provider allowed players to spend a maximum of £500 a week online*
- Players also fed back, however, that the default spend and time limit was often quite high (one example we found was set at £99,999) – perhaps negatively 'anchoring' the norm away from what might be considered a reasonable limit and perhaps even setting harmful expectations about the 'average'
- At an extreme level, one might argue that the most socially responsible operators would set the default limits as low as they possibly could to 'anchor' limits at an affordable level for all

Encouraging breaks in play

Taking a break is a well-documented strategy for regaining self-awareness and encouraging self-reflection. Predominantly, however, operators were using communications to try to achieve this – and there may be considerable potential in more structural or 'nudge' based approaches.

Planning breaks in advance

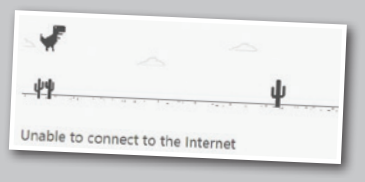
- Some operators had instituted planned 'breaks in play', where games would be structured around a timetable which incorporated rest periods, or where 'time-outs' would occur after a certain period of play
- During the innovation process, some operators also felt there might be opportunities to encourage players to take a break – e.g. providing 'fun diversionary activities', like non-gambling 'free' games' or providing food

Play Right – Current Trial

- It's an app for customers to encourage them to manage their own play. It allows customers to set limitations/parameters for themselves (i.e. time spent in the venue; times of the month when they don't want to be gambling) and thus provides them ownership over their own behaviour and limit setting
- It will give personal alarms, but also will let the venue know if he/she enters outside of their parameters and staff will approach them to remind them

Simple interrupt alerts

- Some operators shared interrupts designed to help players stay aware of their playing time and take regular breaks
- Some players had seen these alerts, and while they appreciated the idea, most felt they were too easy to dismiss and could come across as patronising
  - For example, 'let's take a break', particularly when accompanied by an emoji style picture, was felt to be a bit childish/paternalistic



Gamifying interrupts

- Some operators suggested 'gamifying' interrupts and messages – so players associate breaks with positive and fun interactions, rather than being nagged or disrupted
  - *Example (left): The 'Easter egg' game that appears on smartphones or computers when trying to do a google search without signal – providing users with something fun to do, which passes the time and allays frustration*

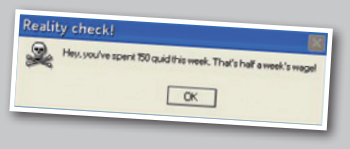
Self-Appraisal Messages

- Much research has shown that a well-timed question had more impact on the likelihood that a player would stop and think about their behaviours than a warning sign
- During fieldwork, some players noted that they would find a question to be less 'naggy' than a warning sign as it gave them more ownership over their own behaviours
- Some players also felt that self-appraisal messages placed at key moments in play (and in between play) could enable them to maintain control over their own behaviours better
  - *For example, one player suggested that having a message near the ATM asking whether they had planned to take out more cash, could help stop them from spending more than they had planned to*

Receipts and statements: Net spend

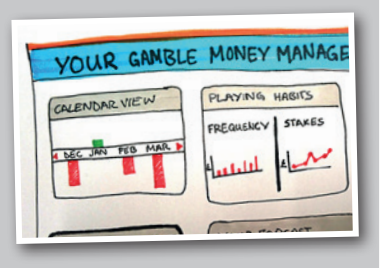
Net spend receipts

- During concept testing, we tested the idea of being given a receipt providing information of net spend
- Across all the ideas, this was one of the most popular – easy to understand, familiar and meaningful
- While players acknowledged that the information might make them 'uncomfortable', they also imagined it serving as a useful reminder – one they could choose to act on or ignore as they chose
  - *This would align with existing evidence that players prefer solutions which promote autonomy and enable independent decision-making, rather than giving them direct instructions or telling them what to do*
- At the same time, players also recognised that receipts were easy to discard – and pointed out that the measure wouldn't work for every player, every time



'What you could have bought' messages

- Highlighting real-world examples of what spend amounts could otherwise have purchased makes money more tangible to players, and encourages appraisal of behaviour
  - Example (left): From a New Zealand-based gambling website *(http://www.choicenotchance.org.nz/#slider=0)*
- Many players spoke of the effect of money feeling 'intangible' or 'not-real' within the gambling environment and felt that some mechanisms which helped them remember the value of the money they were spending would be helpful
- Players felt that the tone of these messages could be either motivating or patronising –depending on the creative execution. Players tended to feel that the skull and crossbones was a bit melodramatic, though appreciated being reminded of the value of money when in 'the zone'
- Some players felt that even simple ways of reminding them that the money they played with was real would help them maintain control over their spend
  - *For example, one player felt that pop-up messages could highlight the value of spend in a session by having stacks of pound coins/notes*



'Smart' spend management

- This idea was developed to illustrate the future potential of player statements, based on data gathered through account-based play
- Players immediately recognised the idea, relating it to recent developments in utility bills and smart energy monitoring – something that the majority felt could be helpful (if not always comfortable to know)
- A minority were also aware of services like Monzo (*https://monzo.com/*), which enables current account customers to track their finances in an engaging, motivating way

Pillar 3: Creating Supportive Environments

Summary of key challenges & Principles

Pillar 3 objective: To ensure all players receive adequate care and support to prevent gambling related harm

Challenge: Players and staff often have firmly held assumptions about 'who' problem gamblers are; they often 'other' RG information as currently framed

Principle: Normalising RG and promoting healthy gambling behaviours for all

- Challenging assumptions about problem gamblers – creating new models of understanding
- Tone needs to be relevant to all players – not just those with perceived problems
- Staff and operators need to practice and embed an early intervention approach, seeing RG interactions with all players as part of their responsibility
- There needs to be a clear justification for when and how RG interactions with customers are logged so this is clear to staff, operators and regulators

Challenge: RG is strongly associated with compliance and licensing

Principle: RG needs to be a commitment to a set of behaviours and values that are symbiotic and embedded within core business strategies – not something that is merely legally compliant

- Decoupling RG from compliance training and information
- Providing staff with clear values, behaviours and actions that are part of their everyday roles
- Providing staff with bespoke training that clearly outlines the RG responsibilities associated with their role

The evidence for creating supportive environments

The need to encourage responsible gambling for all players

Staff and players both have various assumptions about who RG measures are for – and who 'problem gamblers' are. Both our research and previous studies suggest that 'problem gamblers' are often perceived to exhibit extreme behaviours like stealing to fund a gambling habit, losing their home or lying to family members about gambling related money problems. And yet many of the players we studied felt that, on occasion, they too had experienced gambling-related problems.

Staff often shared with us views that seemed contrary to the training they should have received. Most felt the training had done little to challenge their assumptions and pre-existing knowledge. Indeed, some materials seemed to reinforce perceptions that RG is only relevant for those currently experiencing issues (e.g. focussing RG interventions towards gamblers that exhibit observable behaviours).

Perhaps the focus on 'problem gamblers' should be seen as a sign of past success – demonstrating that previous initiatives have been incorporated into general culture. However, the latest thinking (for both experts and operators) is that waiting until individuals show signs of problems is too late – and there should be an increased focus on more proactive and preventative measures.

Some operators were taking a more proactive approach, and had embedded RG training within their general customer service training. There were also many instances of staff proactively engaging customers in RG-style interactions, either a result of training or just because they thought it was the right thing to do. However, the clear majority of staff struggled to see what role they could play in an early intervention strategy. They preferred the idea of waiting until they had more concrete evidence of 'problems' before approaching players to discuss their play.

The need to provide RG tools & responsibilities for all staff

Existing RG training is often positioned alongside technical and legalistic compliance information. Thus, staff were often much clearer on aspects of the training (and their responsibilities) in relation to compliance and licensing obligations. When asked about RG, many misinterpreted the question as being about the licensing objectives, and started to tell us about specific rules and procedures relating to Age Restrictions and Know Your Customer.

Across many businesses, the training provided to all staff, regardless of role and seniority, is standardised. This leads to gaps in practice and thinking, for HQ staff and in career progression/skills development.

Much of the SR training we reviewed was knowledge-focused, with staff required to be able to recite objectives, pass tests and log interactions, rather than thinking more broadly about impact and change. Many said RG training was 'boring'. Some felt it was 'something they [employers] have to tell you', and considered it of 'low value' to the organisation and their everyday role. The lack of clear application of RG messages for everyday working practice often left staff feeling that RG was not a priority (either for them or the organisation they worked for). Those in marketing and product development apportioned an especially low value to RG and they often saw it as a 'wearying' process they had to go through, rather than one which they saw the value of. Some felt that RG was clearly in tension with other performance measures and financial incentives, which were often communicated more regularly and with more emphasis.

The need for continual reinforcement & useful tools

Staff need simple tools, techniques and a range of actions to understand how and when to conduct RG interactions – particularly where these include all mainstream players, not just 'problem gamblers'. Throughout the research, staff made regular requests for help to enable them to know what to say or do when opportunities arise – whether it be where to sign-post players, how to communicate product information, or how to challenge misconceptions.

Even after successfully speaking with customers about a concern or providing information, staff can feel unclear about 'what happens next'. Options available (e.g. self-exclusion) can feel binary or extreme, and staff worry about the stigma associated with suggesting someone requires a 'formal break' from gambling. There also remains significant challenges in how to measure and demonstrate interventions when delivered as 'good customer service' – and how to do so in a way that staff do not find onerous, and collects data with integrity.

Key insights from our research

Touchpoints	Challenges to resolve
At point of play	■ Staff regularly feel uncomfortable approaching people and have received little training about how to do this (when/how) or what to say when they do ■ Staff are often unclear about RG features and strategies that a player might use to protect themselves from harm
Reference information	■ Staff manuals and information often focus on compliance rather than RG – this can be technical and fact-based, rather than empowering staff to create and foster RG spaces within the gambling environment ■ Staff are given few tools or reminders of the RG training they have received – especially if conducted online as e-training ■ Staff can inadvertently reinforce misunderstandings about how games work (e.g. gambler's fallacy, randomness) due to not having had their own assumptions challenged or being given alternative ways to explain how games work
Communication and information	■ Resources and communication in staff areas focus on sales and marketing/customer service, with RG information currently more recessive ■ Some operators and venues have no systematic way of communicating with staff, resulting in a host of problems – including limited opportunities to communicate and remind staff of RG priorities ■ Staff feel they have a lot to remember regarding compliance information and RG ■ Training approaches can feel overwhelming and scripted, with a perceived need to learn 'by rote', rather than adopting key principles, values and behaviours

Staff	■ Staff can 'other' problem gamblers, and are unclear how best to support 'mainstream' players ■ RG isn't integrated across all roles within business structures, meaning staff are often unclear about specific RG actions that relate to their everyday roles ■ Staff often had unchallenged and stereotypical assumptions about 'who' might benefit from RG support ■ Staff who were given opportunities to discuss and reflect on RG interactions appreciated it as a learning opportunity ■ Staff sometimes admitted they had colleagues who showed signs of gambling-related harm, but didn't have the tools or processes to support them ■ Staff raised concerns that they wouldn't be able to help players after they had identified a problem and, beyond self-exclusion, often had limited awareness of other options ■ RG testing and logging creates an environment where RG is seen as onerous (i.e. acts as a disincentive for staff to engage) ■ RG often isn't in-built into performance indicators, meaning staff lack incentives to see it as part of their everyday roles
Environment	■ Gambling environments are often noisy and highly stimulating, which can feel at odds with 'staying in control' ■ Places for players to take breaks (e.g. quiet rooms) are sometimes perceived to be stigmatising ■ There is a lack of signposting to sources of support outside of the gambling sector

Practice to learn from

Embedding RG into company culture

Within some business structures, RG was clearly seen as a priority, and embedded into the DNA of day-to-day operations. Too often, however, these kinds of claims were not reflected on the ground, with many staff still demonstrating pervasive negativity about RG activities – describing them as 'futile', or believing it would be 'impossible' to change player behaviour/attitudes.

Role modelling and reflection

- Some operators were giving staff opportunities to 'role model' RG behaviours – for example, establishing RG awards and case studies that were circulated in company newsletters and via intranets
- One operator was about to start having 'risk and compliance champions' who would receive extra training and incentives in ensuring that their branch was doing RG well
- Some also offered 'lunch and learn' events – offering staff the opportunity to learn about the importance of RG from a business perspective, and how it should be factored into their daily roles
- Many of the working group members were keen that there might be a range of cross-industry events throughout the year where members could meet and discuss the latest initiatives – highlighting best practice and learning from each other

Supporting staff through gambling-related harm

- Few operators had any processes in place to support staff who may themselves be experiencing gambling-related harm
- Some felt that, for them to truly take responsibility for their customers, it would be necessary to ensure staff were also appropriately supported

Making RG relevant & applicable

The typical RG training we studied covered compliance and licensing regulations, and 'problem gambling'. Staff generally described it as 'boring', and found content around 'problem gambling' difficult to apply to their roles. Thus, staff regularly said they lacked confidence in how to appropriately deliver against the RG messages they received.

Normalising RG as an integral part of everyday work

- Some businesses had realised that RG was not about what they *said* they did, but how they (and all their staff) behaved every day
- In these instances, this realisation has had a direct consequence on training, with RG becoming more embedded in the core behaviours expected of staff – and RG training often being entirely integrated with customer service
- This approach was felt to be helping to simplify messaging to staff (e.g. one set of messages, rather than two) and normalise RG as an integral part of core business functioning (rather than a separate activity)
- An unintended consequence is that staff trained in this way had less awareness of the thinking behind the RG activities – despite delivering them as a key part of their role (i.e. they 'did' RG, but didn't necessarily think of it as such)

Available and accessible support for staff

- Staff raised that they needed support and advice – particularly when new to the role or dealing with situations they found difficult or challenging
- In some businesses, it was unclear where staff should go for help or support – and some managers were described as being dismissive of staff concerns
- At other operators, 'real time' support is available – e.g. online chat moderators being able to speak to a supervisor or customer service team while on a call
- Some businesses had RG champions – typically colleagues and peers, who were available to help support staff, 'role model' good behaviour and answer questions

Engaging and realistic behavioural training tools

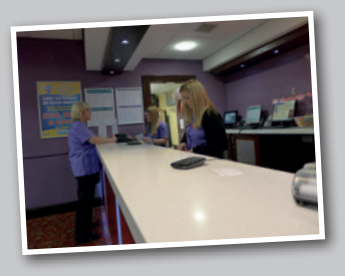
- Some operators were experimenting with more engaging training – tailoring provision to different 'learning styles' (e.g. more visual vs. more text-based)
- Staff have varied opinions about e-learning vs. classroom-based approaches, but the key feedback was to ensure it was empowering and applicable to their roles
- Some managers were taking great care to support staff with regular face-to-face training: role-modelling RG behaviours, observing and providing feedback to staff
- Some operators had created short, 'humorous', and easily shareable videos that encourage staff to buy-in to the need for good customer services, and how this relates to RG. Others were integrating film and animation into training to aid realism and relatability
- Many operators had used role play in training to build staff confidence. Some had even invited actors into training to give staff a chance to practice more difficult situations

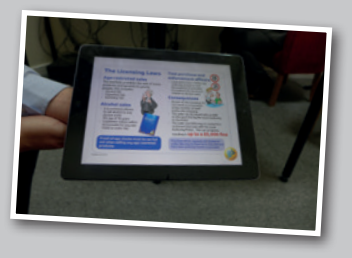
Ensuring RG remains a priority & top of mind

Some operators said they were struggling to ensure that RG does not fall down the priority list. They often had a range of strategies to help ensure that key messages were retained and used. For others, however, RG training was simply a 'tick box' exercise; their goal was often simply 'the number' of staff who had successfully completed the training, rather than the impact it has on day-to-day performance and customer experience.

Induction packs and pre-employment staff engagements

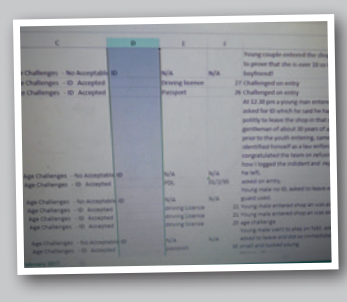
- Some operators highlighted that RG training should start at recruitment and be embedded into all aspects of the HR process (role descriptions, induction packs etc.)
  - *This would ensure that key messages were embedded and expectations shaped from the very start of an individual's employment journey*
- Staff highlighted that induction training could be overwhelming, with a lot of information to take in and remember. They felt that more could be done to provide information (or recap key messages) in more manageable, memorable 'chunks'





Innovating the delivery and structure of training

- Many operators had systems in place to give staff annual RG refreshers and many training modules had immediate knowledge reviews or 'quizzes' – but tests tended to be multiple choice, and staff could take the test multiple times if they failed
- However, despite the effort that had gone into the development of training, staff often saw RG training as 'silly', with tests too easy and simply needing knowledge of the 'right answers', rather than evidence that they had acted on the information
- Some operators were already providing tablets and free Wi-Fi, to enable staff to do training in breaks and before/after work and operators expressed a desire for more 'short-form' or 'bite-size' training opportunities, as it was often operationally difficult to free staff up for longer periods
- Other staff were being encouraged (and paid) to do training from home, with operators providing training portals that were easily accessible from any computer
- Outside of formalised training, some operators had developed 'train the trainer' modules for managers to promote 'on the job' training for staff
- Some operators also conducted longer term 'tracking', often provided in an automated way by the e-training module. This could test knowledge at a later point, and demonstrate information retention over time
- Some operators conducted annual surveys about satisfaction at work and with training, but staff felt nervous when these were not anonymised
- Many operators also asked for feedback after training (e.g. via a Survey Monkey questionnaire, with some simple questions about satisfaction, enjoyment, etc.)



Reporting and logging RG interactions

- Some operators provide staff with simple, online logging procedures that enable them to quickly report details of interactions and give extra detail where necessary to ensure that the integrity of records is maintained without becoming onerous for staff
- Some working group members felt it would be helpful if there was some clarity about the different types of RG interaction, and which do and don't require logging
- Those operators who were attempting to combine RG interventions with their customer service activities, raised concerns about the blurred line between 'early intervention' and 'good customer service' – and the potentially onerous reporting activities that might be required as a consequence of the increased level of RG activity

Integrating RG into staff reviews and quality assurance

- Some operators had integrated RG into their staff appraisal and quality assurance procedures, requiring staff to talk through RG customer interactions with their managers in order to improve and progress

Providing players with appropriate support

While many operators felt they had made progress in delivering RG training, others recognised substantial gaps in what support they could offer players who might benefit from it.

Tools to support behaviour change

- Staff often said that, beyond self-exclusion, they lacked a clear sense of what options they had to support players
- Some had developed a range of options, at different levels, for staff to offer players (e.g. one online operator had created cooling off periods between one day and six weeks; game freezes; deposit limits of £10 a day, deposit locks, sin bin)
- However, it was generally acknowledged that more work needs to be done to develop options for staff to offer players (beyond break-taking or self-exclusion)
- There are significant opportunities here to link with actions highlighted elsewhere in this report (e.g. RG Messaging, tools to promote self-awareness, clear pathways for accessing information and advice)

Linking with local support providers

- Some operators' training highlight a range of support networks and charities to support individuals with problems they are experiencing that might be directly or indirectly related to gambling. For example, this could include introductions to or information about non-gambling related advice services like Debtline, Money Advice Service, Shelter, Citizen's Advice Bureau, CRUSE bereavement charity, local day centres or respite care etc.
- This kind of sign-posting was the exception rather than the norm, with a lot more work to be done in thinking through how to effectively support players, without putting staff in a difficult position

5

Recommendations & next steps

"We need clear and actionable success criteria which outlines what 'good' looks like"

Working Group Chair

This project has demonstrated that operators across diverse sectors are currently doing a wide range of activities to promote Responsible Gambling cultures within their businesses. However, practice was often patchy, sometimes at odds with other business priorities, and key messages hadn't consistently filtered through to the frontline, or to staff in non-customer facing roles (but whose work directly impacts players – e.g. marketing, product design, customer experience).

To address some of these issues, the values shared earlier in the report are a useful starting point. These are the key enablers of change – and thereby a useful way of evaluating current RG performance.

Value	Description	Self-assessment questions
Proactive & Inclusive	**Operators need to proactively embed RG practice for all players**	■ Are we providing tools & support to protect *all players* from harm, or are we still waiting for them to show signs of problems before we act? ■ Are we ensuring that RG interventions are proactively integrated into the normal playing experience, rather than passively 'providing' them? ■ Do our staff genuinely understand the importance of early intervention and harm minimisation for players – and its relationship to their job role?
Integrated	**RG activities must be integrated with all other business activities**	■ Does our RG strategy make sense as a unified plan – with different component parts of the plan integrated around a clear vision? ■ Are we making use of the full range of skills within our company to deliver the best RG interventions we can? ■ Do our RG actions compete with our other business activities? Have we clearly signalled the importance of RG through incentives and corporate messaging? ■ Are we ensuring that RG messages are motivating and appealing to players – and not undermined by other sales or marketing messages?
Impactful	**RG activities need to be designed, delivered and assessed with impact on customers in mind**	■ Are we confident that we have done our best to ensure that RG interventions have the necessary impact with players? ■ Are we testing and improving RG interventions with feedback from players – particularly around appeal and understanding? ■ Are we using a range of skills (often already employed by larger operators) to deliver RG activities – e.g. creative, insight, innovation?
Empowering	**Staff and players must be supported with appropriate RG tools**	■ Are we creating an environment where players feel empowered and enabled to make changes to their playing habits to prevent harm? ■ Do staff feel confident and supported in promoting RG messages and engaging customers?
Continuous improvement	**The industry must cultivate a culture of ongoing learning**	■ Are we regularly coming up with & sharing ideas to help improve and develop current RG practice? ■ Are we continually identifying and investing in areas of the business where RG practice needs to be improved? ■ Are we working in partnership with other operators to share mutual learning and improve RG practice across the sector? ■ Are we effectively monitoring the problems & challenges that exist within the business to understand the impact and effectiveness of our efforts?

What should we be aiming for?

Over the last eight months, it has become very clear that, while many of the challenges that exist across gambling sectors are similar, the operating models and customer base of different operators means that solutions may look different from business to business. All operators have a different mix of resources and tools at their disposal, which they should choose to deploy in the most effective way for their business.

As such, we haven't specifically recommended a 'set menu' of actions for operators. Instead, we trust that operators will conduct a comprehensive review of the key findings and select those actions that are most pertinent to their own businesses. From our experience of collaborating with members of the working groups, we believe that the industry is ready for this kind of maturity – with everyone working towards clear outcomes for players, and finding effective solutions that suit their own business (rather than half-heartedly implementing measures they think will please an external group of stakeholders, but which are never fully owned by the business, nor implemented effectively, or which sit uncomfortably with the brand and corporate values).

This said, there are several clear areas of underperformance within each of the three pillars of RG, which must be addressed within any operator RG strategy.

Pillar 1: enabling informed choice
Overarching objective

Ensuring all players have a good understanding of the cost, risk and play experience of the games they play

Illustrative expectations

- Re-evaluation of the misinformation currently available within gambling environments, especially that which promotes false beliefs (unless there is clear evidence that it doesn't impact player understanding or reinforce misunderstanding)
- More prominent, 'at a glance' comparison of cost, risk and play experience of different games available at point of purchase/point of play
- Use of plain English and avoidance of industry jargon and terms that are difficult to understand
- More visual and easy-to-understand presentation of key facts/vital statistics about the game (prioritising meaning over technical accuracy if needed)
- Challenging the Gambling Commission about what information is important to maximise player understanding of gambling products and acting to implement changes across the board
- Ensuring staff are confident to explain the key features and different return rates for different games in a simple & easy to comprehend manner
- Easily available and compelling tools to help players (and staff) understand and apply gambling concepts that they find challenging – such as randomness and luck
- More standardised and compelling signposting to key information about different games across the sector (e.g. clear icon/button across all games/machines/website pages to allow customers to find support/instructions)

Pillar 2: improving self-awareness Overarching objective

To help players stay in control and effectively monitor the financial and social implications of gambling decisions

Illustrative expectations

- Prominently delivered and engaging RG communication campaigns aimed at mainstream players (in addition to existing communications aimed at problem gamblers). Messages should promote self-awareness by providing customers with practical tools and strategies to stay in control, specifically helping customers overcome the barriers to existing, well-known advice (e.g. setting limits, taking breaks)
- Lowering default limits within pre-commitment devices to reasonable levels and ensuring they are regularly revisited and easy to find
- Setting clear thresholds for 'intervention' or concern that an individual may be showing 'warning signs' of problem gambling and the implementation of appropriate monitoring systems to detect these patterns (for example, account-based play across the gambling sector – tied to personal ID – allowing early warning systems & tailored statements/personal alerts)
- Integrating behaviour change tools into games to help promote limit-setting or break-taking (e.g. using 'nudge' techniques or behaviour change techniques like pre-commitment devices)
- Development of behavioural training & toolkits for staff to use in daily work – e.g. managers' toolkit explaining how to encourage and develop skills in shop floor staff, practical guidance on how and when to approach customers
- Physical or digital receipts/statements/ notifications after playing that provide players with a clear understanding of how much they have spent – both in terms of initial cash put in and winnings sunk

Pillar 3: creating supportive environments Overarching objective

To help players stay in control and effectively monitor the financial and social implications of gambling decisions

Illustrative expectations

- Leadership around RG and incentives/ progression structure that rewards progress in social responsibility
- Building RG principles into core job descriptions and hiring processes
- Setting targets that incentivise progress and success in RG
- Delivery of memorable & impactful training that is tailored to individual job roles and easy to apply on a day-to-day basis
- Ensuring staff understand the importance of proactive approaches to responsible gambling and the relevance of early intervention for all players (not just those showing signs of problems)
- Support for staff who may experience problems with gambling or financial worries relating to gambling (for themselves, their colleagues or their family/friends)
- Ensuring staff feel confident to deliver RG interventions and have a range of options to help support players when they have identified a need for further support
- Identifying and challenging assumptions held by staff about 'problem gambling' & how gambling works (e.g. at staff induction, performance reviews)
- Having RG champions, who can help embed and extend RG within each gambling establishment – and provide support and encouragement to staff (e.g. organising lunch meets, regular refreshers)
- Ensuring that staff engagement mechanisms are effectively used to prioritise RG messages and behaviours (e.g. noticeboards, newsletters, team meetings)
- Links to a range of different local supports for players – including non-gambling related community organisations and charities

Concluding thoughts

Critical to the RG mission is reconciling different, sometimes competing, objectives within and across each business. Those who had made the most progress were those who had been given permission to work creatively, and influence all the decisions that could impact player experience: from marketing, insight and customer experience through to game design and innovation. To achieve RG objectives, it's vitally important that other operators follow suit – ensuring that player protection sits at the centre of their businesses.

Several challenges – and therefore opportunities – relate to how resource and skills are applied to RG problem-solving, particularly among those larger operators who already have capacity in house. For many, current efforts to help players make informed decisions (Pillar 1) are weak, especially in comparison to the marketing and advertising messages that sit alongside them. By galvanising these resources to focus more on RG – and reflecting more on communication priorities (e.g. thinking about prioritising relevance and meaning for players ahead of 'technical accuracy') – much could be achieved in a relatively short space of time.

A key area of opportunity also surrounds the fact that much 'awareness-raising' activity (Pillar 2) currently focuses on helping individuals to self-identify as 'problem gamblers' – something which sits at odds with aims of early intervention and harm prevention. An inadvertent consequence of this is that players across the board struggle to relate to messages which feel aimed at those with more serious problems – meaning there is a huge opportunity in exploring how messages could be made more relatable to the average player.

Similarly, more needs to be done to engage players at both a rational level *and* while they're in a 'hot', perhaps less rational playing state. Current activities around pre-commitment and in-game interrupts are a good start, but when tested with players they can be off-message and sometimes even work against stated objectives – for example anchoring average spend at a level *higher* than an individual player initially thought was appropriate.

Finally, there are still some fundamental and wide-ranging challenges around culture change, leadership and the support provided to staff to help them deliver against RG objectives. Within many operators, staff struggle to understand the importance of RG, feel like it isn't a priority, and can struggle to see the relevance to their role. Without stronger, more single-minded leadership around RG – and without taking steps to ensure it filters down to the frontline – other efforts to improve outcomes for players may yet remain limited in their impact.

Where next?

Although we have outlined clear recommendations, it is vital that this report is not seen as representing the 'last word' on RG – still less, that the ideas we outline are definitive or the only options for change. On the contrary, our hope is that this report is just a starting point for more self-sustaining transformation – acting as fuel and inspiration for those who are committed to change.

We hope that the report demonstrates the value and importance of testing interventions with both players and staff. Many of the shortcomings in existing measures became immediately and abundantly obvious once they were seen from players' perspectives – making it very clear that testing of RG materials and interventions has, to date, been virtually non-existent. If the industry is to seriously embrace RG, and aspire to effective solutions, it is essential that ideas are developed on a bedrock of user insight and testing – with the same standards applied to developing RG solutions as are currently employed in creating promotional marketing materials.

With many operators already having the necessary in-house skills for this – in insight, innovation and product development – we see no reason why larger businesses can't quickly begin to achieve this more user-focused approach: something which is likely to quickly pay dividends, particularly in those areas where good RG practice is currently weak or inconsistent. By maintaining the 'industry conversation', and sharing learnings with smaller operators who lack similar resources, there is a clear way forward for operators to achieve the concerted, industry-wide approach that is so essential to bringing about long-term change.

At the same time, however, it is important that the need for evidence doesn't become a hindrance to progress – with operators waiting for proof of a 'silver bullet' solution before they commit in earnest to RG activity.

Given the range of different kinds of interventions being introduced, tracking change of each initiative individually is going to be hard. Therefore, it is important that the industry can monitor progress using other methods of tracking. For example:

- Player tracking surveys – perhaps including measures of the level of player knowledge about games, prevalence of gambling myths and with the opportunity to track change over time
- Staff surveys – to track knowledge, understanding and confidence in delivering against the RG vision
- Structured and published mystery shopping exercises
- Peer review and feedback (test visits from critical friends)

Looking ahead to phase 2

Looking ahead, we believe that Phase 2 of this project presents a great opportunity for operators to see the benefits of developing and testing ideas with real players, in 'real-world' settings.

We believe there would be significant benefit in departing from the traditional, large-scale and slow-moving quantitative evaluations towards a more rapid and agile approach – one which takes account of how players experience the industry, and the pivotal importance of multiple industry actions (across all touchpoints) working in tandem to guarantee effective outcomes.

6

About the project

Project background

This project was instigated by IGRG and commissioned by GambleAware to help gather, celebrate and promote current RG practice across all the gambling sectors – and to identify opportunities for improvement. The aim was to go beyond the current status quo regarding RG – much of it informed by adherence to the Gambling Commission's Licence conditions and codes of practice (LCCP) – to develop innovative new ways of promoting RG through knowledge sharing and collaborative working.

Engagement with industry was central to the project design, and operators from all sectors, big and small, were involved in a range of capacities throughout the project. We convened two industry led working groups (one focussed on messaging, the other on training), and conducted many site visits across the sector.

This report builds on a vast range of evidence from academia and industry-expert bodies which we reference, but do not seek to replicate.[35] Additionally, as part of the project, the Revealing Reality research team (and Future Thinking) have conducted an array of new primary research[43] covering both players and staff, across a range of sectors throughout the UK.

Working collaboratively with the Working Groups, the research team and participating operators have overseen all project activities, reviewing current practice and developing new ideas.

34 Refer to Annex 2

35 This research included exploratory qualitative research and concept testing fieldwork (using tools from a range of design disciplines including User Experience Research) – full details are included in the Annexes

Definitions

Responsible Gambling (RG) practices are those designed to prevent and reduce harms associated with gambling behaviour. Previous research (e.g. Blaszczynski, 2014; Griffiths, 2009) has invested heavily in attempting to identify the 'best' language and definitions to use to describe the actions of averting harm, which we will not replicate here.

However, for clarity, throughout this report we use the term 'responsible gambling' as a general description of activities or actions that promote the financial health and personal wellbeing of players.

This project has also used the principles of 'harm minimisation', and has looked at responsible gambling activities as applicable to a broad range of players, not just those who are already experiencing gambling-related harm. Blaszczynski (2002) outlines three levels of harm-minimisation

- **Primary prevention:** Strategies to protect participants from developing gambling problems.
- **Secondary prevention:** Limiting the potential for problems to arise and containing the impact of gambling once it has commenced.
- **Tertiary prevention:** Reducing the severity of existing problems and prevention of relapses.

The core focus of this project has been within the primary tier and secondary tier, although elements may also have relevance to the tertiary.

7

Supporting materials and annexes

Annex 1

Case studies

Case study	Description	Key RG challenges
Case Study 1: Arcade Player – Mishka **PGSI: 6**	■ Mishka regularly went to the arcade after work – finding the arcades a relaxing and welcome distraction from other stresses ■ Though she started on the 2p machines, her current favourite game has a £1 stake. She feels she knows the best machines to play on and has a good understanding of when it will pay out ■ Mishka knew and liked the staff in the venue, but didn't feel that they'd ever helped her to manage her gambling. She admitted that 'my mum would go ballistic if she knew I was wasting all this money down here'	■ Mishka did not meet the problem gambler definition, but did experience some problems because of her gambling, losing £1,000 over the course of a week in January ■ She described herself as financially stretched and said that sometimes she ran out of money because of her gambling ■ She had fantasies about 'winning big' and thought that, overall, a big win would probably balance out the rest of the money she'd spent on gambling ■ Mishka held false beliefs about the nature of the games she played – believing that she had strategies to win on games that were random, and that the more money she put in, the more likely she was to win ■ Mishka had not perceived any of the RG materials in her local venue to be relevant or interesting to her
Case Study 2: Bingo Player – Sally **PGSI: 4**	■ Sally went to the bingo once or twice a month with her friends – but had used to go more frequently, and alone, in the past, following the death of her husband (at the time, she felt bingo was the one place she could go and feel distracted) ■ During this period, she said she had broken down in tears in the venue. While going to the bingo hall almost every day made her feel less alone, she had panicked about how much money she was spending ■ A staff member had gone to check she was okay, but didn't do anything beyond offering her a glass of water. It was at this time, she went to stay with a friend who advised her to seek support and perhaps take a break from the bingo for a while	■ Sally did not think of herself as a problem gambler, as she was just going to bingo for a bit of 'headspace' from her relationship ■ She did admit the frequency with which she was going was unaffordable, but she rationalised it as being a 'temporary' period (it lasted around four months and ended up with her having significant credit card debts) ■ When she had her 'breakdown', she appreciated the support of the staff member, but didn't perceive them to have done anything beyond 'being kindly' ■ She had seen messages around the venue with 'friendly advice' on them, but didn't perceive them to be relevant – although in retrospect, they might have been helpful

Case Study 3: Sports Betting customer – Jameel **PGSI: 7**	■ Jameel loves sports betting. He's a fan of betting on football and baseball, but has placed bets on the horses and other sports before ■ He loves the immediacy and thrill of 'in-match' betting and feels it adds to his experience of watching his favourite teams. However, he sometimes feels he gets carried away – especially with online betting – as he can just keep putting more bets on ■ Sometimes he finds himself feeling angry and frustrated – and on several occasions he's bet way more than he intended to, even taking money from the account he shares with his flatmates (which got him into lots of trouble)	■ Jameel loves the speed and immediacy of 'in play' betting, but often gets so caught up in the game he doesn't take a moment to think about how much he has bet in total – sometimes that means he ends up spending a lot more than he had intended to ■ Jameel has noticed the 'Gamble Aware' logos at the bottom of ads, and thinks it a good thing, but hasn't processed any messages he thinks are relevant to him ■ When going into betting shops, Jameel has noticed 'When the Fun Stops, Stop', but has often thought to himself that, for him, the fun never stops when you are gambling – it's afterwards that the regret kicks in
Case Study 4: Casino Customer – Danny **PGSI: 6**	■ Danny loves to go to the casino on a Friday night – he likes to play on the machines, blackjack and, occasionally, if he's feeling lucky, roulette ■ Danny will usually set himself a limit for the night and usually takes this money in cash with him. However, sometimes will get so absorbed in the game (particularly if he's losing), that he will go and get more money out ■ On a few occasions, he admitted spending more than £400 – which was a lot more than he could afford. He admits that he doesn't really know how the machines work, but has a strategy for roulette which involves looking out for patterns in the 'hot and cold numbers' shown on the screen	■ Danny likes to get himself established on his 'favourite machine' and admits feeling stressed if someone else is queuing to play on it ■ He is a member of the loyalty scheme at the casino – but has never been shown how much he has spent there (he admits this might be a bit terrifying – but probably useful!) ■ He wonders why the casino would want to do anything to help prevent players from spending too much money ■ On the occasions where he has spent too much money, he's had to cut back on socialising (including the casino) for many weeks afterwards – which he described as 'depressing' ■ Danny is always on the lookout for ways to 'beat the system' – he believes his 'hot and cold numbers strategy' is a particularly good one, as he heard about it from someone who used to work in the casino

Annex 2

Underlying behavioural economics concepts

Framing and anchoring	**Anchoring is a form of priming effect where initial exposure to a number serves as a reference point and influences subsequent judgements about value. The process usually occurs without our awareness (Tversky and Kahneman, 1974[36]), including when people's price perceptions are influenced by reference points[37].** ■ Relationship to gambling ■ Messages within the gambling environment are often framed around winning, when in fact, over time, most people will lose ■ In self-limit setting features, the often high default limits create an 'anchor' from which people set their own limits, biasing people towards setting limits higher than they might otherwise have selected for themselves
'Othering'	**'Othering' describes the reductive action of labelling a person as someone who belongs to a subordinate social category defined as the 'other'. The practice of 'Othering' is the exclusion of people who do not fit the norm of the social group.** ■ Relationship to gambling: This kind of 'othering' is common in relation to players' understanding of RG messaging and activities, as they often feel they're important, but they don't have personal relevance to them and therefore can fail to take ownership of any associated actions. The differences here between 'I feel a message is aimed at a problem gambler and not me' and 'I feel that it's useful and helpful for me' are in many cases almost entirely tonal and very subtle
'System 1' vs. 'system 2' thinking[38]	**'System 1' is fast, instinctive and emotional thought; 'System 2' is slower, more deliberative, and more logical. The distinction is closely related to Hot and Cold States[39] – i.e. people under the influence of visceral factors ('Hot State') don't fully grasp how much their behaviour and preferences are being driven by their current frame of mind; they think instead that these short-term goals reflect their general, long-term preferences** ■ Relationship to gambling: ■ The difference between how people think and feel when they are playing versus when they are not means they may have entirely different levels of understanding and self-awareness ■ People in a cold state have difficulty picturing themselves in hot states, minimizing the motivational strength of visceral impulses. This leads to unpreparedness when visceral forces inevitably arise

36 Tversky, A., and Kahneman, D. (1974). Judgment under uncertainty: Heuristics and biases. Science (New Series), 185, 1124-1131.

37 Wansink, B., Kent, R. J., and Hoch, S. J. (1998). An anchoring and adjustment model of purchase quantity decisions. Journal of Marketing Research, 35(1), 71–81.

38 Kahneman, D. (2011). Thinking, Fast and Slow. Macmillan

39 Loewenstein, G. (2005). Hot-cold empathy gaps and medical decision-making. Health Psychology, 24(Suppl. 4), S49-S56.

Optimism bias	**Daniel Kahneman writes of a 'pervasive optimistic bias', which 'may well be the most significant of the cognitive biases.' This bias generates the illusion of control – making us feel that we have more control of our lives than may actually be the case.** ■ Relationship to gambling: The natural tendency of players to remember wins and forget losses is a function of optimism bias. In practice this means that players will naturally under-estimate the chances of losing and over-estimate the chances of winning – a tendency which is reinforced by cues within the gambling environment (such as continual reference to 'winning') and articulation of win to loss ratios (rather than vice versa)
Availability Heuristic	**Tversky & Kahneman (1973)[40] argue that people tend to believe what comes most easily to mind – i.e. people take information at face value and tend not to work to question the validity of the prompt or association – leaving humans vulnerable to misinformation.** ■ Relationship to gambling: players will assume that the likelihood of winning the lottery is greater than the reality due to the amount of press coverage that winners receive. In the gambling environment, this might also mean that players estimate their likelihood of winning as greater than the reality due to the proximity and attention-grabbing features of 'wins' (including lights and noises) compared to losses (which often have no cue)
Risky choice framing	**Levin *et al*. (2002)[41] argue that risky choice framing effects occur when willingness to take a risk depends on whether the potential outcomes are positively framed. This framing effect is used a lot in public health messaging, as people are more likely to opt for a positively framed risk.** ■ Relationship to gambling: Framing the risk of gambling in terms of 1 in 10 chance of winning, encourages players to overestimate their chances of winning and underestimate chances of losing. When this is flipped to a 9 in 10 chance of losing, players were more able to effectively appraise their chances of winning and make better informed choices about the risk they are taking
Attribute framing	**Levin *et al*. (2002)[42] write that attribute framing effects happen when objects or events appear more favourable when a key attribute is framed in a positive rather than negative way. For example, by using positive attribute framing in the food industry, businesses encourage consumers to see the 'good' things in their food rather than the 'bad' – i.e. by highlighting the 90% pork meat content in sausages, consumers will tend not to question what the other 10% is.** ■ Relationship to gambling: When people see 97% pay out rate they only cognitively process the fact that they will get money back, rather than the likelihood of losing

40 Tversky, A., and Kahneman, D. (1974). Judgment under uncertainty: Heuristics and biases. Science (New Series), 185, 1124-1131

41 Levin, I. Gaeth, G., Schreiber, J. & Lauriola, M. (2002) 'A New Look at Framing Effects: Distribution of Effect Sizes, Individual Differences and Independence of Types of Effects' in Organisational Behaviour And Human Decision Processes, 88:1, pp. 411-429.

42 Ibid

Goal framing	**Levin *et al* (2002)[43] describe goal framing effects as occurring when a persuasive message has different appeal depending on whether it stresses a positive effect that certain behaviours will have rather than the negative impact of certain behaviours. Alcohol companies tend to promote responsible drinking through promoting the positive outcomes associated with responsible drinking (i.e. promoting the rewards of good behaviours) whilst drink aware campaigns about drink driving act as a deterrent by highlighting the risks of over-indulging.** ■ Relationship to gambling: whether RG messaging is framed via reward or penalty will have an impact on the likelihood of someone adopting certain behaviours. Whilst research finds that some stark messaging does have a positive impact on behaviour change, at others framing according to virtuous behaviours can encourage the adoption of RG behaviours
Belief in law of small numbers	**Tversky & Kahneman's (1971) argue that people have a tendency to apply the rules of chance from large samples to small samples. For example: in the case of flipping coins, people know that after many flips, you should end up with 50% heads and 50% tails. However, these proportions do not necessarily apply to smaller sample sizes. In a sample of 10 flips, you could just as easily end up with 70% heads and 30% tails.** ■ Relationship to gambling; Product information relating to pay-out rates can lead people to mistakenly believe that this rate of returns – e.g. 92% – means for every £100 they put into a machine, they are likely to get £92 back. However, the 92% rate of return is a number for a large sample and does not necessarily apply to a small sample such as £100
Gamblers fallacy	**Burns *et al*. (2004)[44], propose that people struggle to understand fixed probability, and have a tendency to believe that the odds for something with a fixed probability will increase or decrease depending upon recent occurrences. This means that people are more likely to erroneously pick out patterns – seeing events as connected. For example, in coin flipping, if the focus is placed on the coin – after a streak of 'tails', a person is more likely to believe that the coin is due to switch to heads despite the probability of the coin landing on heads remaining at 50%.** ■ Relationship to Gambling; the cues & features such as 'reserving' a machine can reinforce the false belief that the game is 'due' to pay-out after a long string of losses
Hot hand fallacy	**Roney *et a*l. (2009)[45] write that people tend to think that a person who has experienced success with a seemingly random event has a greater chance of winning in later attempts. For example, in coin flipping– after a streak of tails a person is more likely to believe that the run of tails will continue as they have a 'hot hand', and therefore underestimate the probability of the coin landing on heads, despite it remaining at 50%.** ■ Relationship to Gambling; Cues around "hot and cold numbers" and "winning streaks" reinforce the false belief that patterns/streaks will continue despite being random

43 Levin, I. Gaeth, G., Schreiber, J. & Lauriola, M. (2002) 'A New Look at Framing Effects: Distribution of Effect Sizes, Individual Differences and Independence of Types of Effects' in Organisational Behaviour And Human Decision Processes, 88:1, pp. 411-429.

44 Burns, B. D., & Corpus, B. (2004). Randomness and inductions from streaks:"Gambler's fallacy" versus" hot hand ". Psychonomic Bulletin & Review, 11(1), 179-184.

45 Roney, C. J., & Trick, L. M. (2009). Sympathetic magic and perceptions of randomness: The hot hand versus the gambler's fallacy. Thinking & Reasoning, 15(2), 197-210.

Annex 3

Methodological detail[46]

STEP 1

REVIEWING CURRENT PRACTICE AND KNOWLEDGE

Workin Group 1:
Creating a shared vision

Research team gathering and analysing examples of existing practice and reviewing evidence

STEP 2

IDENTIFYING GAPS AND REMAINING CHALLENGES

Working Group 2:
Identifying gaps and challenges

Research team conducting site visits and new primary research players and staff across all sectors

STEP 3

DEVELOP AND TEST NEW IDEAS

Working Group 3:
Identifying gaps and challenges

Research team developing ideas generated within the WGs and testing them with staff and players

- Over **250** examples of current practice were submitted, logged and analysed
  - 50+ related to the training work stream
  - 150+ related to product information and in-play messaging
  - 50+ related to social messaging
- An extensive literature was conducted across the four work streams
- Interviews were conducted with over 25 experts from the gambling sector and beyond
- Over **30 venues** were visited
- Over **90 staff** were interviewed over 20 days-worth of place based staff immersion
  - Staff were representative of both HQ roles and retail (customer-facing and non)
  - They represented all sectors of the industry
- Over **95 players** were researched, involving a variety of research methods, including depth-interviews, rapid concept testing and ad-hoc intercepts
  - Players were recruited from across country. They represented a range of ages and ethnicities and a gender split weighted towards men (to be representative of players). All players scored between 0–7 on the PGSI scale.

Fieldwork for all four work streams followed a similar flow. The range of research techniques included: collection of best practice submissions from across the industry; an extensive literature review; industry and non-industry expert interviews; numerous working and steering group meetings; depth interviews with players; in-situ co-design sessions with staff; concept testing with staff and players; and place-based ethnography and observation.

46 For further methodological detail, refer to annex 2 in the evidence summaries

Supporting documents

For further reading refer to Annexes within the accompanying evidence summary document

- Annex 1: Project Objectives and Background
- Annex 2: Methodological Overview
- Annex 3: List of participants
- Annex 4: Literature review and wider reading
- Annex 5: Current Practice & other sources of innovation
- Annex 6: Primary Fieldwork & Insights
- Annex 7: Transition to the three-pillar structure
- Annex 8: Ideas development & concept testing
- Annex 9: 18 Feet final ideas summary
- Annex 10: Future thinking report

REVEALING REALITY

A Revealing Reality Report

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