



RAPID EVIDENCE REVIEW

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# The Role of Credit Cards in Gambling

Prepared for: Gambling Commission  
MARCH 2020

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#### SUGGESTED CITATION:

Gambling Research Exchange Ontario (GREO). (2020). The Role of Credit Cards in Gambling. Birmingham, UK: Gambling Commission.

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GREO is an independent knowledge translation and exchange organization with almost two decades of international experience in generating, synthesising, and mobilising research into action across the health and wellbeing sectors.

GREO helps organisations improve their strategies, policies, and practices by harnessing the power of evidence and stakeholder insight. Services we offer include sourcing and synthesising evidence, creating knowledge and education products, facilitation and stakeholder engagement, data and knowledge management support, evaluation, and applied research.

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# Executive Summary

The Gambling Commission's 'National Strategy to Reduce Gambling Harms' in Great Britain is a three-year plan that was launched in 2019. As part of the strategy, the Commission is tackling the issue of gambling with borrowed money. The Commission's Advisory Board on Safer Gambling's (ABSG) advice to inform the 2018 report, *Review of Online Gambling*, identified gambling with borrowed money, including credit cards, as a well-established risk factor for harmful gambling.<sup>8</sup> Specifically, the report stated that gambling with credit cards increases the risk that gamblers will spend more than they can afford.<sup>8</sup> Due to this concern, an area for future work was to consider if gambling using credit should continue to be permitted.<sup>8</sup>

In August 2019, the Commission opened a public consultation to explore the options of either 1) banning the use of credit cards for gambling entirely (including online betting, casinos, bingo, lottery, and land-based bookmakers), or 2) introducing limits and restrictions on the use of credit cards. This report provides the best available evidence on the effectiveness and considerations of implementing a ban or restriction on credit card use to gamble. It will be used to inform an evaluation plan to measure the impact of the regulatory intervention.

The first section of this report is a review of data on credit card use (supplied by the Remote Gambling Association (RGA) and the Gambling Commission), to provide insights and context around the current use of credit cards for gambling in the United Kingdom. The second section consists of a Rapid Evidence Review (RER) that examines the use of credit in online and offline gambling contexts.

In general, the evidence reviewed suggests that credit card use during gambling may be potentially problematic due to: (a) the ease by which credit cards can be obtained and used to gamble, (b) the large credit and potential debt available, and (c) facilitation of play without natural breaks. Moreover, evidence suggests a relationship between increased credit card use and increased gambling problems. However, the exact nature and direction of causation has yet to be determined.

- › Easy access to money with credit cards may allow gambling problems to persist and/or intensify. Specifically, gambling with credit cards may put the gambler into debt which they cannot easily repay, and this debt may accumulate faster for quick-turnaround, large-volume gambling formats (e.g., slot machines, sports betting). For some gamblers who already have financial problems, access to credit cards may be particularly dangerous.
- › Using credit cards to gamble is associated with multiple forms of harm. Resource-related harms include participation in illegal activities (such as fraud) and financial difficulties; relationship-related harms are seen in strained relationships with loved ones and negative family impacts; health-related harms are noted primarily in poor mental health.
- › Use of credit cards to gamble may indicate that an individual has increased their degree of borrowing from other sources to fund gambling, including unsecured loans, pawning, and loan sharks. Increased credit card use and other forms of borrowing to gamble may indicate problem gambling behaviour.
- › Across jurisdictions, bans and restrictions take the form of:
  - › financial institutions banning or limiting the use of credit cards for online gambling
  - › credit card holders blocking gambling transactions
  - › limitations on the use of credit cards in casinos
  - › efforts to prevent using credit card payments in connection with illegal gambling
  - › banning credit card use in land-based and/or online environments
  - › restricting the number of payment options that can be used simultaneously
  - › setting and enforcing maximum deposits

- › Given the lack of empirical evaluation on the effects of credit card bans, it is important that regulators work with both the financial institutions and gambling operators to create policies that are realistic and feasible.
- › Banning credit cards may result in unfavorable unintended consequences such as movement towards anonymized forms of payment for gambling, which could undermine harm minimization efforts. In addition, there may be several challenges to banning credit cards which may lead players and operators to try to bypass the ban. It is therefore crucial that a systematic evaluation be conducted if ban policies were enacted, to determine if any of these unintended consequences do occur.

# Introduction

The Gambling Commission's 'National Strategy to Reduce Gambling Harms' in Great Britain is a three-year plan that was launched in 2019. As part of the strategy, the Commission is tackling the issue of gambling with borrowed money. The Commission's Advisory Board on Safer Gambling's (ABSG) advice to inform the 2018 report, Review of Online Gambling, identified gambling with borrowed money, including credit cards, as a well-established risk factor for harmful gambling.<sup>8</sup> Specifically, the report stated that gambling with credit cards increases the risk that gamblers will spend more than they can afford.<sup>8</sup> Due to this concern, an area for future work was to consider if gambling using credit should continue to be permitted.<sup>8</sup>

The Commission opened a call for evidence on gambling with credit cards in February 2019 to consider the issue further. In August 2019, a public consultation followed to explore the options of either 1) banning the use of credit cards for gambling entirely (including online betting, casinos, bingo, lottery, and bookmakers), or 2) introducing limits and restrictions on the use of credit cards. This report provides the best available evidence on the effectiveness and considerations of implementing a ban or restriction on credit card use to gamble. It will be used to inform an evaluation plan that will measure the impact of the regulatory intervention.

This report consists of two independent activities. Section 1 is a review of data on credit card use supplied by the Remote Gambling Association (RGA) and the Gambling Commission. Specifically, this data was investigated to provide insights and context around the current use of credit cards for gambling in the United Kingdom.

The second section of this report consists of a Rapid Evidence Review (RER) that examines the use of credit in online and offline gambling contexts. Specifically, the review explored:

- › The relationship between credit card use and gambling related harm
- › Differences and similarities between the use of credit cards for gambling to the use of other forms of borrowing to fund gambling
- › Gamblers motivations to use credit cards to gamble
- › Evidence and evaluations of any existing credit card use, ban, or restriction in other jurisdiction, including a focus on unintended consequences
- › Gaps in the evidence base surrounding credit card use and gambling

Although there is no agreed upon definition, rapid evidence reviews generally examine empirical evidence related to a specific question, in a way that can be replicated (see Methodology in Section 2 for more information). Rapid reviews are also usually completed within six months to meet deadlines,<sup>9</sup> such as for policy decisions. This rapid review is an initial step before the development of a Theory of Change, which will inform an evaluation of the regulatory changes.

# Section 1

## Insights from Data

### REMOTE GAMBLING ASSOCIATION MEMBER DATA

To help contextualize credit card spending on gambling in the United Kingdom (UK), 12 members of the Remote Gambling Association (RGA) provided the Gambling Commission with credit card deposit data. This also included data on deposits from other payment methods and related to customer transactions made in the month of February 2019. This snapshot allows for real-world comparisons of credit card expenditure in the UK. Insights from this data revealed that:

- › Only 5% of deposits to online gambling sites were made through a credit card. Most deposits were made with a debit card, at 81%. The next most common method at 11%, was via eWallets (which may be funded through credit or debit account). Only 1% of deposits were funded by pre-paid cards, and 2% by other methods.
- › Of those who deposited using credit cards, 45% only deposited via credit card, while 55% used mixed methods of payment.
- › Customers who only deposit through credit card deposited 20% less monthly than those who deposited using mixed methods of payment (including credit cards).
- › Of all of the credit card deposits made in one month (840,983), 92% were between £1 and £100. An additional 8% were between £100 and £1000 and less than 1% were more than £1000.
- › Considering the cumulative monthly total deposited by individuals who gambled with a credit card, most (68%) deposited between £1 and £100. About one quarter (26%) deposited between £100 and £1000. Only 6% deposited more than £1000 per month from their credit card (with only 1% depositing more than £5000).

- › Most gamblers who use credit cards have one active credit card on their account (85%). Just over one in ten (11%) have two active credit cards, whereas 2% have three active credit cards, 1% have four, and 1% have five or greater active credit cards.
- › 19% of all RG (customer) interactions were with individuals who had made a credit card deposit in that month. Responsible gambling interactions include anything that would be caught as “a customer interaction” conducted in accordance with license conditions. It’s important to note that each operator’s policy and procedure for initiating these interactions may differ as they are not standardized.
- › Of those that have VIP status with the gambling operator, approximately 6% of the amount deposited from these gamblers came from credit card deposits.

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## Summary

Taken together, these data suggest that those who use credit cards with other payment methods (i.e., multiple payment methods), may be spending more and be at greater risk of credit card debt. Although the overall prevalence of credit card use is relatively low, this data is unable to inform us about the extent of harm that may be experienced among users of credit cards.

The percentage of the amount deposited from credit cards is similar in the general population (5%) and among VIP players (6%) who would presumably have access to more cash. While this may limit concerns about the extent of use of credit cards to gamble, for example where VIP players have higher levels of disposable income with which to make credit card repayments, it is possible that some VIP players may be at a high risk of harm (e.g. if their access to high levels of credit to fund their gambling leads to them borrowing more than they can afford to repay).

Although the amount deposited by credit cards users tends to under £100 per month, these deposits make up the majority (92%) of all deposits. The data suggests that consumers are generally making multiple credit card deposits (transactions) per month. It may be that consumers are making several smaller deposits over the month rather than making a monthly deposit in one transaction. It may be normal for online gamblers (including those using debit cards or other non-credit payment methods) to make multiple deposits rather than make one single large deposit. However, multiple deposits made via credit card will incur multiple transaction fees, which would exacerbate the level of debt accrued. Therefore, it may be that some of those who use credit cards have a limited amount of credit available, or otherwise cannot afford to put a single large transaction on their card. It may also be that credit card gamblers are gambling impulsively, and depositing money in their accounts when the urge/need/want strikes.

Given the number of total deposits (840,983), multiplied by an average credit card cash advance fee of £3, suggests that the total number of active customers (165,225) accrued >£2.5 million in transaction fees alone during February 2019. This number is even larger if we consider that cash advance fees are likely to be more than £3 for larger deposits (e.g., >£60). Adding to these fees the principle amount and interest, there is

considerable debt being accrued by credit card gamblers, and those that make the largest deposits with the greatest frequency may be at the greatest risk of financial harm.

Finally, the data also suggest that credit card users are likely to be disproportionately represented among the cohort of customers who receive an interaction. While credit card users only account for 5% of all deposits, they account for 19% of all customer interactions, which may be an indication of greater harm (i.e., distress) among credit card users.

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## GAMBLING COMMISSION ONLINE TRACKER DATA

To further contextualize gamblers' use of credit cards and other forms of borrowing within the United Kingdom (UK) context, the Gambling Commission provided GREO with findings from their latest online gambling tracker. This tracker consists of a nationally representative sample of approximately 2000 UK adults over the age of 18. The Gambling Commission provided GREO with a high-level overview of online gambling tracker data, and also allowed GREO to request additional analyses for the purposes of this review. Insights from the supplied data and additional analyses are outlined below. Since there were differences in how the data was analyzed, they are reported on separately.

### High-level Overview of Online Gambling Tracker Data

Results from this analysis were narrowed down to only those who had reported gambling online in the past 12 months, resulting in 982 (out of 2093) respondents. Approximately 14% (n=128) of respondents who gambled online in the past 12 months reported gambling with a credit card online. Approximately 6% (n=65) of respondents who gambled online in the past 12 months reported gambling with another form of credit (an overdraft, payday loan, other loan, or through family and friends).

### Demographic Variables

- › Compared to all gamblers that gambled online in the past 12 months (48.2% of whom were aged 18-44), those who had gambled online with credit cards were more likely to be between the ages of 18-44 (57%) and those who gambled with another form of credit (e.g., overdraft facility, payday loans, other loans, family and friends) were also most likely to be between the ages of 18-44 (80%).
- › Overall, gamblers were more likely to be male, with men making up 57% of online gamblers in the 12-month time period. Men made up a higher proportion of online credit card users (65.4%) than those who gambled with other forms of credit (52.3% male).
- › Compared to all gamblers that gambled online in the past 12 months, those who had gambled online with a credit card were more likely to be working full-time (76.5% vs 67.8%), own their own home with a mortgage or a loan (43% vs 33.1%), and be from AB (i.e., those in higher and intermediate managerial, administrative and professional occupations) social class (39.8%

vs 27.5%). Those who had gambled online with another form of credit were more likely to have owned their own home with a mortgage or a loan (46.2% vs 33.1%), or be renting from a housing association (15.4% vs 7.1%) or somewhere else (20% vs. 13.4%) and much less likely to own outright without a mortgage (9.2% vs 30.9%).

### **Gambling Behavior**

- › Those who had either gambled with credit cards (62.5%) or another form of credit (69.4%) were more likely to play four or more gambling activities compared to all online gamblers (39.3%).
- › Those who have either gambled with credit cards (14.1%) or another form of credit (17.2%) were more likely to play every day compared to all online gamblers (8.0%). In addition, those who gambled online with credit cards (4.7%) or another form of credit (3.1%) were less likely to play less than once a month compared to all online gamblers (10%).
- › Those who had either gambled with credit cards or another form of credit were more likely to play on a laptop (45.6% and 56.9%), a mobile (56.0% and 72.3%), and on SmartTV (6.4% and 12.3%) compared to online gamblers (37.3%, 43.8% and 2.2% respectively).

### **Gambling Problems Measured with the Problem Gambling Severity Index**

- › Those who gamble with credit cards are less likely to be characterised as non-problem gamblers when compared to all online gamblers (33.1% vs. 60.7%). Only 6.1% of those who use other forms of credit are characterised as non-problem gamblers.
- › Within the category of low-risk gamblers, groups were similar with all online players (19.8%), those who used credit cards (20.4%), and those who used other forms of credit (15.2%).
- › Proportions among the moderate-risk gambling group were higher for those who had gambled with credit (24.6%) and those who had gambled with another form of credit (27.3%) compared to all online gamblers (11.6%).
- › Those who gambled with a credit card had a higher proportion of problem gamblers (21.8%) than all online gamblers (7.9%). Those who had gambled online with another form of credit showed the highest proportion of problem gamblers (51.5%).

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## Summary

Examining the demographic data suggests that those most likely to use credit cards are more likely to be young, male, working full-time, own their own home with a mortgage or a loan, and be from AB social class. These findings suggest that those with easy access to credit cards (i.e., a good credit history due to full-time work and AB social class) may be more likely to use this credit for gambling. Therefore, prevention programs aimed at reducing credit use for gambling may consider targeting young males.

Examination of gambling behaviour revealed that those who use credit cards or another form of credit tend to be more engaged, as they gambled on four or more activities and gambled more frequently.

Interestingly, the analysis highlights that those who gamble with another form of credit may have especially problematic behaviour, as they tend to gamble on more activities, more frequently and use mobile technology more than those who use credit cards. Examining gambling problems supports this idea, as those who gambled with another form of credit are much more likely to be classified as problem gamblers. The demographic differences of these gamblers suggest they tend to be younger and less likely to own their own home outright – suggesting they may not have similar access to credit. It is therefore important that any policy designed to reduce credit card use among gamblers also addresses other forms of credit.

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## GREO DATA REQUESTS

To follow up on analysis reported in the high-level overview of online gambling tracker data, The Gambling Commission allowed GREO to request specific analysis to provide additional contextual information. Analysis focused only on those who had used a credit card or another form of credit to gamble. Insights from this analysis follow below.

- › Individuals who used credit cards or other types of credit tended to be from AB social class, but there were more people who borrowed from friends and family in the DE social class (i.e., those in semi-skilled and unskilled manual occupation, unemployed and lowest grade occupations). See figure 1 for a breakdown of social classes by form of credit use.
- › Within all forms of credit used, gambling online was the most common, except for money borrowed from friends and family, with which individuals tended to gamble in person, or a combination of in person and online. There was also a high proportion of individuals who gambled with payday loans, and other loans that could not remember how they gambled. See figure 2 for a breakdown of the method of gambling within each form of credit.
- › Of those who had used each form of credit, credit card use was most associated with gambling on the National Lottery, scratchcards and football betting. Figure 3 shows the number of respondents who used different forms of credit to engage in various gambling activities.
- › Those who used credit cards to gamble were most likely to gamble once a week. This may reflect the fact that gambling on National Lottery draws is popular with those who had gambled with credit cards. Those who used an overdraft were more likely to gamble two or more times a week. See figure 4 for a breakdown of gambling frequency within each form of credit.

*Note: Due to low overall base response numbers in some categories (e.g., specific gambling activities), differences within these categories should be interpreted with caution.*

Figure 1: Social Class Among those Who Have Gambled with Credit

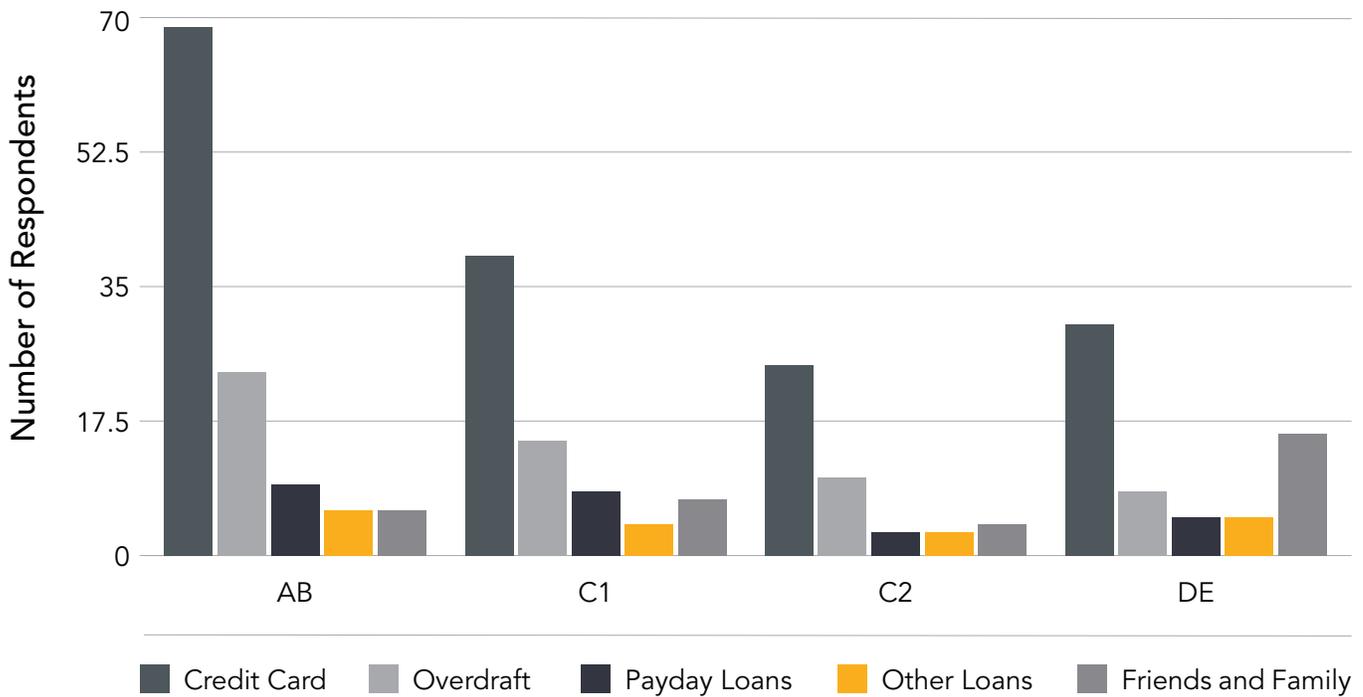


Figure 2: Relative Percentage of Method of Gambling within Credit Type

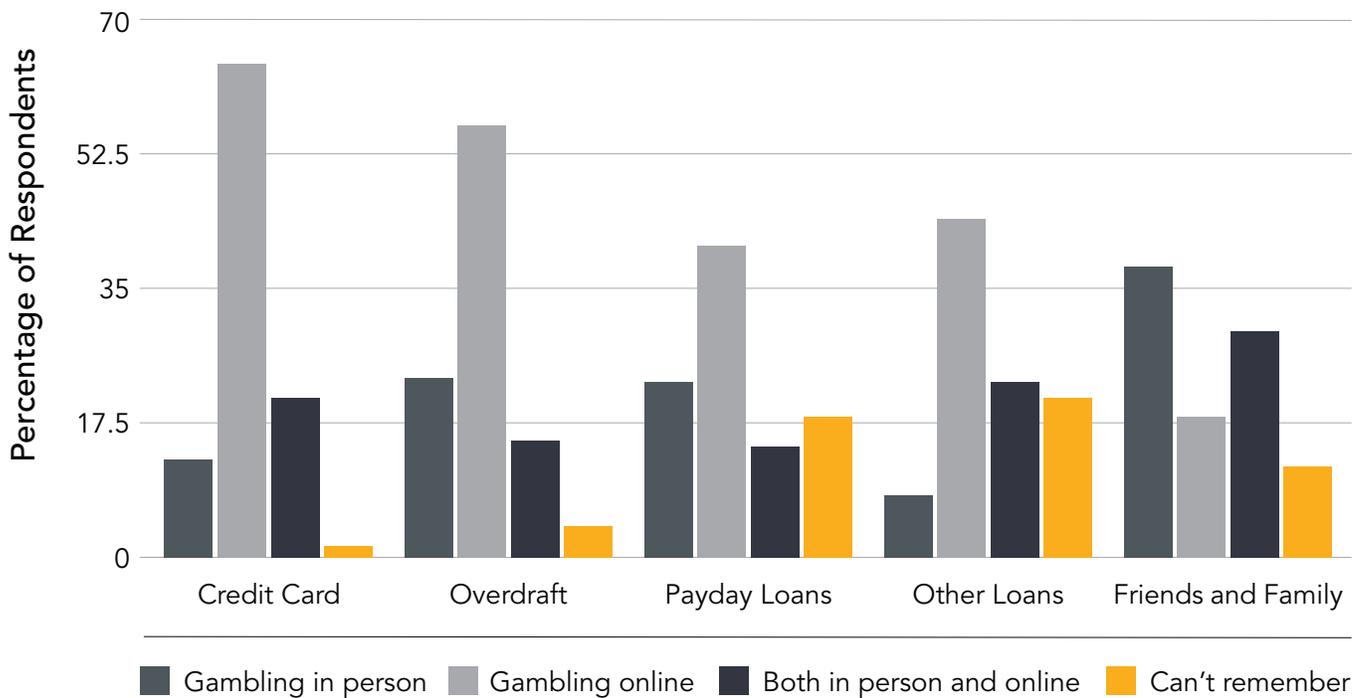


Figure 3: Gambling Participation Among those Who Have Gambled with Credit

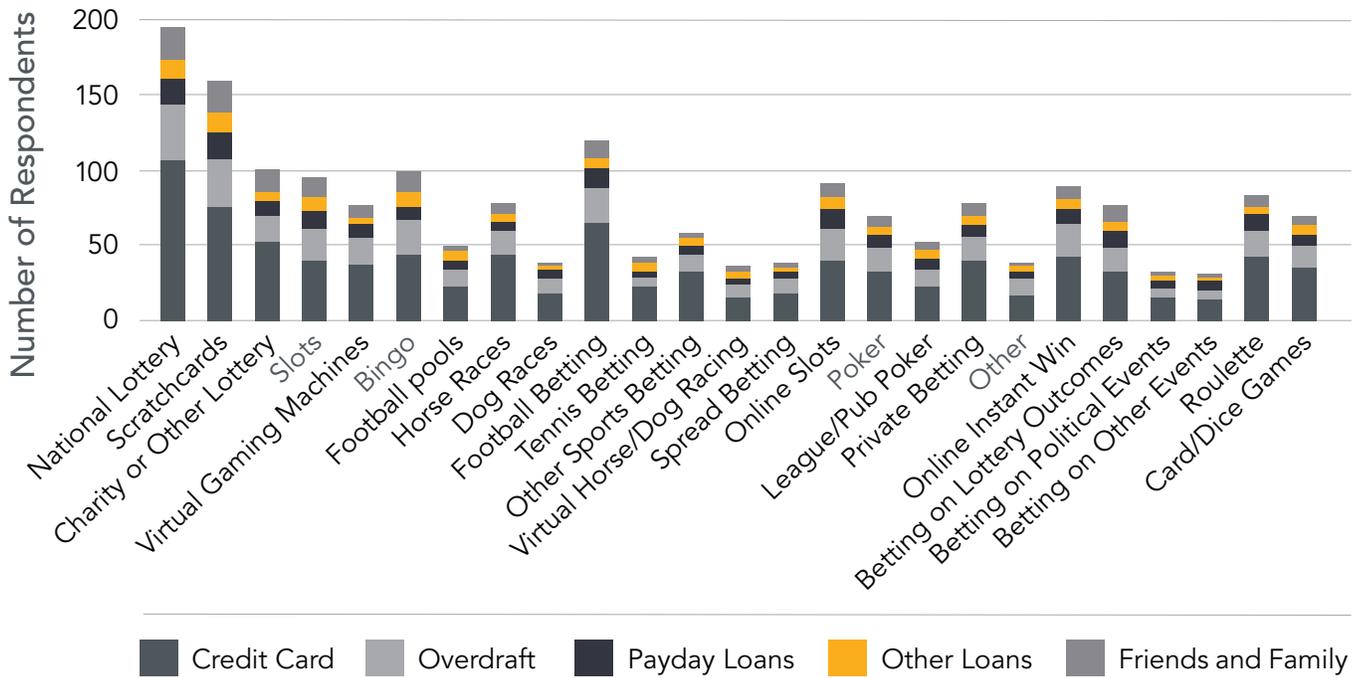
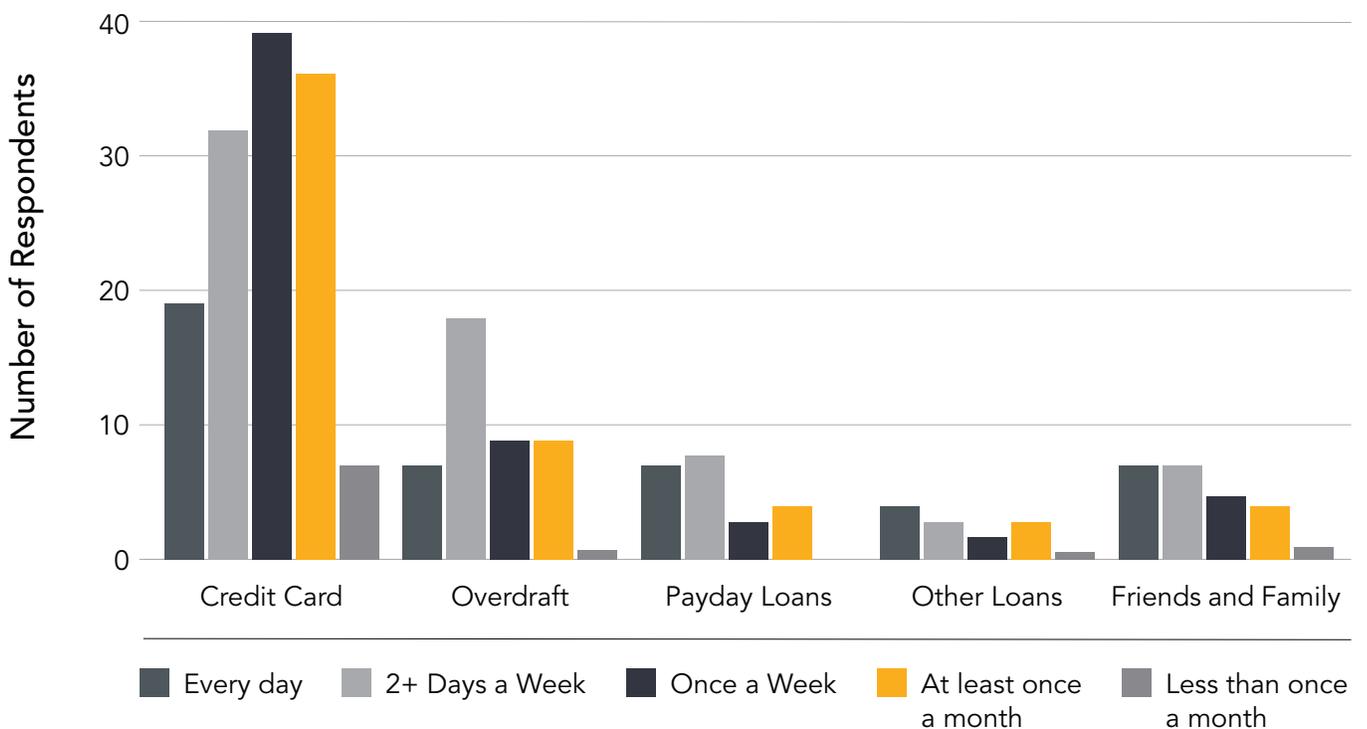


Figure 4: Gambling Frequency Among those Who Have Gambled with Credit



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## Summary

Overall, the results of this data are in line with the analysis reported in the high-level overview of online gambling tracker data. In terms of gambling behaviour, those who used credit cards and most other forms of credit, tended to gamble online. The most common gambling activities for those using credit were the National Lottery, scratchcards, and football betting. National Lottery and scratchcards tend to be low-frequency events, and this is reflected in gambling frequency – those who used credit cards to gamble were most likely to bet once a week.

There were some interesting differences when it came to borrowing from friends and family. These gamblers were more likely to gamble in person (as opposed to online) and demographic differences suggest they exist within the DE social class. It is possible that gamblers who borrow from friends and family may either (a) lack access to traditional forms of credit, or (b) have 'tapped out' existing formal forms of credit and rely on more informal forms. Future tracker data could be used to examine any changes among this group of gamblers if policies are enacted to limit or ban credit card use. Doing so will help determine if gamblers who cannot use credit cards turn to more informal forms of borrowing.

# Section 2

## Rapid Evidence Review

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### METHODOLOGY

A rapid evidence review uses transparent and reproducible search methods to reduce the bias that can occur in literature reviews,<sup>10</sup> and is generally smaller in scope and shorter in timeframe than a systematic review. In this rapid review, we followed PRISMA guidelines for systematic reviews,<sup>11</sup> modified for a rapid review protocol, as set out by Haby et al.<sup>12</sup> As there are few academic articles focused specifically on gambling and credit card use, an extensive grey literature search was also conducted. The searches were completed in September and October 2019.

#### Search strategy

Web of Science, Scopus, MEDLINE, PsycINFO, and Google Scholar were searched for academic evidence relating to gambling and credit cards (or terms relating to payday loans or payment methods), published between 1999 and 2019. Google Scholar searches were limited to the first 100 articles, per the Google literature search methods of the Canadian Institute for Health Information.<sup>13</sup> This search strategy yielded 631 publications.

A document search for grey literature was completed on the following 23 sites (searching with “credit card” on gambling-focused sites, “gambling” on money/credit-focused sites, and both terms on sites with a broader focus), which produced 440 documents:

- › GREO Evidence Centre
- › Problem Gambling Foundation of New Zealand Library
- › Alberta Gambling Research Institute Repository
- › Gambling Commission
- › GambleAware
- › Money and Mental Health Policy Institute
- › Australian Gambling Research Centre
- › Gambling Research Australia
- › Productivity Commission
- › Victorian Responsible Gambling Foundation
- › New South Wales Office of Responsible Gambling
- › Credit Canada
- › Responsible Gambling Council
- › Social and Economic Impacts of Gambling in Massachusetts
- › Economic and Social Research Council
- › The European Commission
- › Gaming Commission (Belgium)
- › Kansspelautoriteit [Dutch Gambling Authority]
- › Spelinspektionen [Swedish Gambling Authority]
- › Folkhalsomyndigheten [Public Health Agency of Sweden]
- › Spillemyndigheden [Danish Gambling Authority]
- › National Council on Problem Gambling [Singapore]
- › Google, using United Kingdom location settings

These sources were selected to capture the Gambling Commission’s regulatory context in Great Britain; relevant Canadian sources; active government-funded gambling research programmes in Australia and Massachusetts; New Zealand’s public-health focused gambling research; newly introduced restrictions and regulations about gambling transactions on credit cards in Singapore, Belgium, Scandinavia, and the Netherlands; and the most relevant results from other organizations using Google.

Included documents were English language publications about forms of payment used to gamble (credit card or otherwise) and credit card debt resulting from gambling (even if not explicitly credit-card related transactions). Documents were excluded if they did not address any of the scoping questions provided by the Gambling Commission, if they were not evidence-based, if they were not accessible electronically, and if they were below “first tier” grey literature document types<sup>14</sup> (such as conference presentation slides, news stories, and press releases).

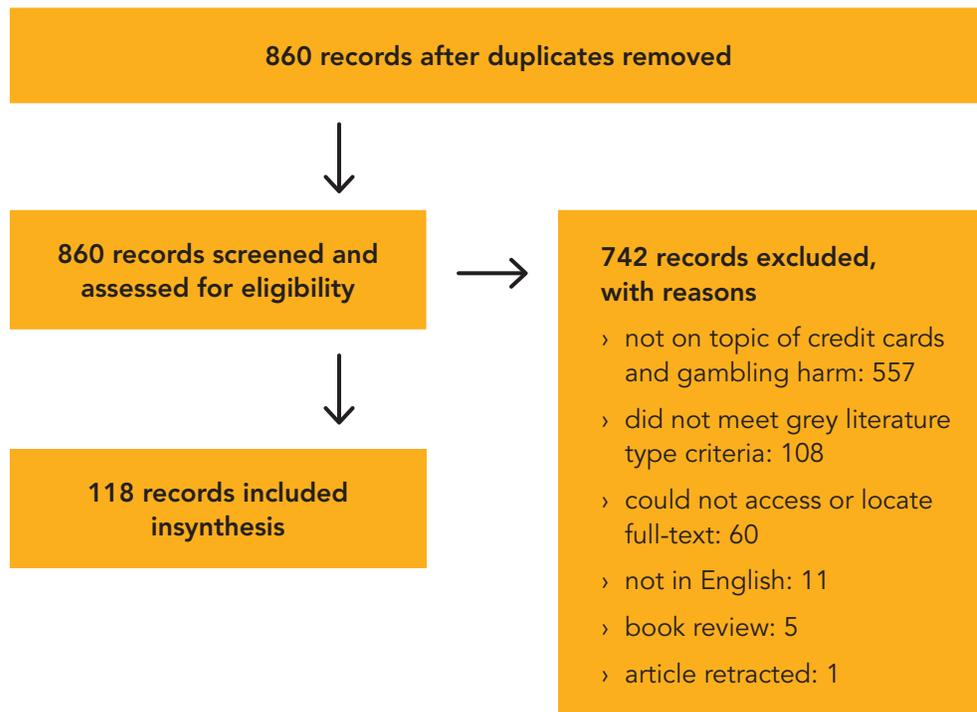
The following are the scoping questions initially provided to GREO by the Gambling Commission:

- › *Is there any evidence of a link between use of credit cards and gambling related harm?*
- › *How does the use of credit cards for gambling compare to the use of other forms of borrowing (such as payday loans) to fund gambling?*

- › *Why do gamblers use credit cards to gamble?*
- › *Has a ban or restriction on credit card use been introduced in any other jurisdiction, and if so, what was the outcome?*
- › *Is there any evidence to suggest that a ban on credit cards could result in unintended consequences (such as gamblers switching to other forms of borrowing)?*
- › *Are there any gaps in the evidence base, and if so, how should these be filled?*

## Search results

In total, 118 publications were included in this review:



Overall, the evidence was strongest in the area of credit use and gambling harm. However, evidence relating to other forms of credit and negative consequences of credit card restrictions was largely absent. In addition, there was no evidence related to player motivations to use credit. No evaluations of any existing bans or restrictions were found in the literature or through GREO's inquiries with a couple of evaluation experts in the field. Comprehensive information on existing jurisdictional bans or restrictions was also difficult to locate.

## OVERVIEW OF CREDIT CARD USE IN GAMBLING AND ASSOCIATED RISKS

Credit cards allow for easy access to borrowed funds, and therefore present an easy way to use borrowed funds for gambling. Gamblers can access funds for gambling using their credit cards through:

- › Direct use to engage in gambling (e.g., online gambling) or purchase lottery tickets
- › Cash advances from a cash machine
- › Securing an eWallet, PayPal, or other third-party account

As ease of access to credit increases, so does the risk that individuals will spend this credit and incur large debts. Therefore, the easier it is to access credit, the more potentially risky credit could be to a gambler.<sup>7</sup> Since credit cards are easy to access, they may facilitate gambling debts.<sup>15</sup> For this reason, gamblers, industry representatives, and other organizations have raised concerns that the ability to use credit cards could contribute to gambling problems.<sup>16–18</sup>

The use of credit may be a risk factor for problem gambling, because there is the potential for gamblers to accumulate debts that exceed their ability to repay. Although most gamblers realize that they should only play with money that they can afford to lose, many may be unsure of their 'affordable limit'.<sup>19</sup> Allowing for quick, easy access to a large amount of credit may prevent gamblers from reflecting on their spending<sup>7</sup> and they may end up overspending.<sup>19</sup> This might be especially true for online gambling, as online gamblers have reported experiencing harms soon after access to higher limit credit cards.<sup>15</sup>

Use of credit cards when gambling may also reduce natural 'breaks in play'.<sup>7</sup> These breaks involve any action that interrupts, suspends, or stops gambling, and creates an opportunity for a gambler to evaluate if they should continue. Gambling with credit cards can create fewer interruptions than can otherwise occur when non-credit sources of funds are exhausted. When funds are exhausted, non-credit sources of funds may require manually replenishing an account with funds or to stop gambling until able to secure more funds.<sup>7</sup> However having access to credit while gambling reduces the number of interruptions, by providing a ready source of funds to continue gambling. Treatment providers value the break that this creates for their clients, as a way for the gambler to reflect and perhaps reconsider if they should continue gambling.<sup>7</sup>

### Who is more likely to gamble using credit and credit cards?

- › **Men** may be more likely to borrow money to fund gambling from banks and credit cards.<sup>1</sup>
- › **Members of ethno-cultural communities** may be more likely to borrow funds to gamble with than others.<sup>1,2</sup>
- › **Those with lower levels of educational attainment** may be more likely to borrow using credit cards and from loan sharks.<sup>1</sup>
- › **Older adults**, especially those at risk for problem gambling, may be more likely to borrow money to gamble using credit cards.<sup>3,4</sup>
- › **Youth and young adults**, who are new to the financial freedom that credit cards can seem to offer, may also be susceptible to using credit cards to gamble.<sup>5–7</sup>

Credit cards are also easily available to people with limited alternative forms of credit (such as a secured loan or line of credit).<sup>20</sup> Conversely, gamblers may perceive the ability to use credit cards as a negative feature, as it undermines their ability to control or self-regulate their gambling expenditure.<sup>21</sup>

Globally, the primary payment method for online gambling is by credit card (however, this may be changing, as highlighted in the findings from Section 1), making them especially vital to the online gambling industry.<sup>18, 22, 23</sup> It is such a common payment method in the global context, that the majority of online gamblers reported that betting with a credit card has no impact on their spending.<sup>15, 23, 24</sup> Since credit cards are the primary form of payment for online gambling globally, one policy maker has argued that banning credit card use for online gambling would reduce online gambling revenue by 30% in the short run.

Based on these concerns, gamblers and numerous organizations have suggested removing credit betting capabilities to help promote more responsible gambling.<sup>25</sup> There currently are various bans on the use of credit cards for gambling machines in the United Kingdom; Manitoba, Canada; and New South Wales, Australia (including an Australia-wide ban for credit card use for gambling from the four major banks) because of the potential to gamble large amounts of money on credit (see jurisdictional scan below).

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## Summary

In general, the evidence suggests that credit card use during gambling may be potentially problematic due to (a) the ease by which credit cards can be obtained and used to gamble, (b) the large credit and potential debt available, and (c) facilitation of play without natural breaks. Although the literature suggests that gambling with credit cards is the most common form of payment for online gambling in the global context, analysis of data in Section 1 suggests this is not currently the case in the British context, notwithstanding whether or not there have been changes in other jurisdictions. Changing preferences for methods of payments may be due to technological advances – especially with the ability to use debit cards and eWallets on gambling sites that previously lacked the ability. The difference between the UK data and the evidence may also be reflective of a general increase in the popularity of eWallet payment methods in European countries.<sup>26</sup> Note that the source of funding for these eWallet transactions includes credit cards, but without this data on the source of funding it is difficult to determine the exact extent to which credit cards are being used for gambling.

## CREDIT CARD USE AMONG THOSE WITH GAMBLING PROBLEMS

Those who experience problem gambling may be more vulnerable to the harmful aspects that can result from gambling with credits cards. Specifically, there is evidence that:

- › Problem gambling is associated with **poor financial behaviors** in general, including the accumulation of credit card debt.<sup>27</sup> Borrowing money in the form of credit card debt is relatively common among problem gamblers.<sup>28–30</sup> Moneys may be used to either fund gambling directly, or pay off debts accumulated due to gambling.<sup>31</sup>
- › **Easy access to credit**, especially combined with the use of digital cash and a lack of assisted betting limits, may facilitate problem gambling behavior.<sup>23, 32, 33</sup> Easy access to credit during moments of impulsivity, excitement, or to chase losses, may tempt gamblers to use credit cards as a form of ‘digital cash’.<sup>23, 32</sup> Digital cash is simply an electronic version of funds, and may feel less like ‘real’ money and have less psychological value, leading gamblers to spend more, and allowing the gambler to avoid any sense of personal responsibility for the debt they incur.<sup>15, 18, 25, 32–35</sup> Increased spending may be compounded by the high-volume betting available with online gambling.<sup>33</sup> Gamblers can quickly accumulate large gambling debts using credit cards, which may act as a pathway to gambling harm through loss of control.<sup>32, 33</sup>
- › The use of credit cards may make it possible for gamblers to **continue to gamble** without realizing the amount of debt they have incurred.<sup>36, 37</sup> Although a majority of online gamblers reported that using digital cash has no impact on their spending, a minority reported that it increased their gambling spending, and that it was easier to spend money online.<sup>15</sup> Ease of depositing and accessing money from an online account may result in greater gambling expenditure because it reduces any ‘cool off’ period, and may facilitate chasing losses.<sup>15, 35</sup>
- › Access to credit cards may provide **favourable conditions to continue or increase any existing problem gambling behaviour**, by giving gamblers a false sense of legitimacy and security.<sup>7, 36</sup> Easy access to credit (through credit cards or other means) may provide gamblers with the sense that they are financially stable and can leverage that to access more credit as needed.<sup>7</sup> Simply activating and using a credit card to gamble may actually lead to problematic play due to the large amount of credit a gambler is now able to access.<sup>38</sup>
- › It is not enough for those who struggle with problem gambling to set limits on their gambling. They also need to monitor how much they win/lose, and **track their spending against their limits**.<sup>39</sup> This is especially true in situations where credit cards can be used, such as online gambling.<sup>39</sup> Researchers have identified a sub-type of gamblers called “chaotic spenders”, who see credit cards and loan companies as easy ways to access money for gambling, or to pay off gambling related debts. Characteristics of chaotic spenders are: not setting a limit of how much to spend before gambling; not being aware of the amount they had brought to gamble; and not monitoring how much they have spent between gambling episodes.<sup>39</sup>

- › Credit card use among gamblers has been linked to increased rates of **bankruptcy**.<sup>40</sup> For example, a study in the United States that examined problem gamblers who declared bankruptcy, found that 59.1% of problem gamblers who declared bankruptcy also had credit card debt due to gambling.<sup>41</sup> Gamblers may also resort to a **second mortgage** to help pay off gambling debt or fend off bankruptcy.<sup>41</sup> However, it has been argued that the ability to declare bankruptcy for gambling expenditure acts as a 'safety blanket', which may encourage gamblers to over-extend themselves financially.<sup>40, 42</sup>
- › Those who develop **gambling problems early in life** may be more likely to have secondary problems related to gambling, including bankruptcy, credit card debt, borrowing money, writing checks that bounce or pawning items to pay off gambling debt.<sup>43</sup> This may be because those with gambling problems from early in life are less financially stable before running into debt issues related to gambling.<sup>43</sup> Betting on gambling using credit cards can also negatively affect **credit scores** by failing to make minimum payments.<sup>44</sup> Banks also may track gambling transactions and use them to justify refusal of future credit, including mortgages and loans.<sup>18</sup>
- › Those with problem gambling will obtain **multiple credit cards** and use additional credit to recycle money between cards and debts until all possible sources of credit are eventually exhausted.<sup>44–46</sup> Credit cards may charge **higher interest rates** for online gambling deposits, treating them as cash advances, which the gambler may not realize.<sup>8, 18</sup> Those with problem gambling are also more likely to use credit cards to access cash advances<sup>47</sup>, and borrow money, or gamble with money, that had been originally allocated towards debt repayment.<sup>48</sup>
- › Although only a minority of gamblers use credit cards to gamble in land-based venues, problem gamblers may be more likely to **use their credit card more than once per session**.<sup>49, 50</sup> For this reason, using a credit card multiple times per session may be an indication of problem gambling in venues. Attempts to obtain cash through credit cards in venues may also signal gambling problems among patrons.<sup>51</sup>
- › There is some evidence that those with problem gambling may actually avoid using credit cards because the **card activity statements provide a permanent record of spending**,<sup>52</sup> which means confronting the losses they have incurred.<sup>16</sup> The signs of problem gambling may be visible in activity statements, which can help loved ones, employers, creditors, or others, detect problems and intervene.<sup>7, 16, 53</sup>

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## Summary

In general, evidence suggests a relationship between increased credit card use and increased gambling problems. However, the exact nature and direction of causation has yet to be determined. This uncertainty is due, in part, to the overall lack of empirical evidence examining the issue. Of the evidence found, most tends to be cross-sectional (i.e., at one point in time), which prevents an understand of the cause-and-effect relationship between variables – all we can deduce is that the factors occur hang-in-hand.

Overall, it seems that easy access to money with credit cards may allow gambling problems to persist and/or intensify. For example, gambling with credit cards may put the gambler into debt which they cannot easily repay, and this debt may accumulate faster for quick-turnaround, large-volume gambling formats (e.g., slot machines, sports betting). Thus, there is a cycle of debt accumulation, with gambling being an enticing escape. However, it may also be the case that gamblers who already have financial problems turn to credit cards as a last resort. Either of these explanations could explain why we see increased gambling problems among those gambling with credit. A recent review by Swanton and Gainsbury<sup>54</sup> in 2019 came to a similar conclusion regarding the relationship between credit and gambling. Specifically they note that "...the body of mostly cross-sectional research conducted to date is insufficient to understand the risk factors and causal pathways." They go on to say that its difficult to establish if credit use is a motivator or consequence to gambling activity.

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## CREDIT CARD USE, BORROWING, AND GAMBLING RELATED HARM

Problem gambling is only one way to measure the harm that can be associated with gambling. The current practice of assessing the extent of gambling-related harm using rates of problem gambling can fail to capture important dimensions of harm, including those experienced by those other than gamblers themselves. Researchers, advocates, policy makers, and others in the field have started to use measures of harm that reflect the adverse impacts of gambling on the health and wellbeing of individuals, families, communities, and society. Using this perspective, we can consider how to measure the real personal and societal costs that result from gambling, instead of solely relying on problem gambling screening tools (none of which are perfect) to determine total cost.

Therefore, we have synthesized the existing literature into resource, relationship, and health-related harms, using the framework of harms as defined in the 2018 report 'Measuring Gambling-related Harms: A framework for action' by the Gambling Commission, Responsible Gambling Strategy Board (this is now the Advisory Board for Safer Gambling), and GambleAware.<sup>55</sup>

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**Resource-related harms:**  
Harm associated with work and employment, money and debt problems, as well as crime and illegal activities.

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## RESOURCE-RELATED HARMS

Most of the literature on gambling related harms from credit card use and borrowing falls under resource-related harms. A section follows on alternative forms of borrowing, as it falls under 'money and debt' problems.

### Credit card use

Data from a gambling help phonenumber service in 2006 suggested that credit cards are the primary source of gambling debts.<sup>7</sup> Interestingly, problem gamblers are less likely to bring a credit card to a land-based venue, possibly because they are trying to resist temptation to overspend.<sup>56</sup> However, they are also more likely to access money from a cash machine before arriving at a gaming venue.<sup>56</sup>

Fraud is well-represented in research related to resource harms of credit card use in gambling. One of the most notable forms of fraud involves patrons' unauthorized use of credit cards to gamble.<sup>57-61</sup> This may be particularly problematic for those underage gamblers who 'borrow' or otherwise find a way to use a credit card (with or without permission) to gamble online.<sup>15, 18, 23, 62-67</sup> There have also been reports of gambling sites being breached, or selling, or losing patron credit card and banking information, which has then been used for illegal activities.<sup>18, 58, 65, 68, 69</sup> Problem gamblers may be most at risk of this fraud, as they may turn to unlicensed or less established operators in desperate times, making them an easy target.<sup>58</sup> Gamblers are generally not as concerned with a gambling site's reputation, license, or payment methods, as they are about payout rates and game experience.<sup>70</sup>

Another form of credit card fraud involves 'chargeback' fraud. This happens when a gambler claims that a transaction on their credit card is fraudulent (not made by them) and the credit card issuer then debits the money from the merchant's account.<sup>18, 71</sup> Due to higher than average default rates on gambling related credit card debts, and the high cost in recovering such funds, credit card companies may pass on the cost to the consumer. As a result, increased borrowing rates can negatively affect all credit card users.<sup>72</sup>

### Alternate forms of borrowing

Problem gamblers may initially use their credit card to gamble and then progress to other forms of borrowing.<sup>7</sup> Additional legal methods to obtain money for gambling include payday loans, pawning/selling goods, and loan sharks. In some cases, when all formal and informal forms of legal borrowing have been exhausted, gamblers turn to illegal activities.<sup>2, 73-75</sup> Illegal activities, such as embezzling funds, stealing from an employer, and bank fraud to fund gambling, underscore the link between white collar crimes and gambling.<sup>76</sup>

Research suggests that problem gamblers are likely to gamble by any means necessary,<sup>21</sup> and are more likely to report a range of different types of debts or loans used to gamble.<sup>77</sup> Specifically, problem gamblers are more likely to report personal loans, credit card debts, and loans from friends and family to fund their gambling.<sup>47, 77</sup> In fact, frequent payment method changes might indicate gambling problems, as it suggests poor planning or shortage of funds, which could imply chasing behaviour.<sup>78, 79</sup>

**Unsecured/Payday loans**

Problem gamblers are more likely than non-problem gamblers to use payday loans to gamble.<sup>80</sup> Payday loans (also known as cash-advance loans) allow for immediate short-term credit, typically provided at a high interest rate, and often involve hidden fees and conditions. The amount of credit provided is usually a percentage of the borrower's paycheck. Betting using credit cards and payday loans may be more risky, and lead to more severe financial losses and debts, compared to using non-credit (available) funds.<sup>23</sup> Similar to credit cards, the often inflated interest rates of payday loans can result in spiraling debts.<sup>20, 23</sup>

A number of studies have suggested that individuals that use payday loans, and/or have poor financial planning, may be more vulnerable to problem gambling behaviour.<sup>81</sup> Individuals that use payday loans may be at greater risk of developing problem gambling because they may be more likely to devalue events that will occur in the future (i.e., delayed outcomes), which can lead to poor financial planning.<sup>82</sup>

Problem gambling also has been found to be directly associated with consumer debt and debt problems among emerging adults.<sup>83</sup> Specifically, problem gambling was related to consumer debt, and consumer debt may worsen financial problems, resulting in psychological distress.<sup>83</sup>

**Pawning/selling goods**

Problem gamblers report borrowing, selling, or pawning goods to get money to gamble, including prized possessions such as jewelry.<sup>20, 73</sup> Often this is a last resort to pay for living costs, when gambling has depleted funds that were set aside for things like food and household utilities.<sup>20</sup> The high interest rates associated with pawning can lead to a cycle of indebtedness, similar to payday loans.<sup>20</sup>

**Loan sharks**

Gamblers have reported turning to loan sharks as another way to obtain money to gamble with and pay off gambling debts.<sup>84</sup> 'Loan sharks' are usually unofficial lenders who operate independently and charge extremely high interest rates.<sup>84</sup> In some cases, the consequences for lack of repayment can be severe, and involve blackmail or violence. It is worth noting that only one source was found that discussed loan sharks. Few of the gamblers interviewed within this evidence reported using or being aware of loan sharks, however those who did were aware of the risks of using them.

## RELATIONSHIP-RELATED HARMS

There is some evidence that provides insight into the negative effects of gambling on other people in the gambler's life. These harms often include violations of trust. Overall, family members often take an active approach in monitoring and controlling gamblers' expenditures, including holding and monitoring credit card use.<sup>85, 86</sup> In some jurisdictions, gamblers are allowed to exclude themselves from gambling using credit services.<sup>7, 87, 88</sup>

Financial difficulties may lead the gambler to lie and deceive those around them.<sup>73, 89, 90</sup> Gamblers may borrow credit cards from loved ones to gamble, sometimes without their knowledge or approval. Problem gamblers can run up significant debt, and even take out credit cards or loans in their loved ones' names.<sup>91</sup> When this debt comes to light, it can cause serious harm between the gambler and their loved ones. Aside from financial issues, the debt from credit cards due to gambling can cause anger and unhappiness for both the gambler and their families.<sup>84</sup>

Five percent of teenagers found the possibility of using their parent's credit card to gamble tempting.<sup>92</sup> One study found that only 23% of underage internet gamblers use their own debit cards for online gambling as most used credit cards that belonged to friends or family.<sup>93</sup> In cases where significant debt occurs, this places the level of responsibility with the credit card owner to, (a) refuse to help access gambling opportunities by disallowing use of the credit card, (b) closely monitor the use of credit cards, or (c) take on responsibility for debt they did not incur.<sup>93</sup> For these reasons, it is important to educate parents about preventing and minimizing underage gambling.<sup>93</sup>

Financial harms associated with gambling need to be examined at the level of the entire household. There is a relationship between the amount of money spent gambling, the use of credit, and the level of credit card payments at both an individual and household level.<sup>94</sup> Specifically, level of household income may affect the willingness of households and individuals to engage in gambling and expose themselves to financial vulnerability through the use of credit.<sup>94</sup> Research suggests that more affluent households may be able to better protect themselves against financial uncertainty, while those in poorer households are less able to do so.<sup>94</sup>

**Relationship-related harms:**  
Harm experienced by individuals who are related to the gambler (i.e., family members, partners, loved ones, friends or even the greater community).

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## HEALTH-RELATED HARMS

There is little research examining how credit card debt may contribute to health-related harms. As noted in the previous section, debt from credit cards due to gambling can cause anger and unhappiness for both the gambler and their families.<sup>84</sup> In addition to this unhappiness, there is some indication that debt and addictive behaviors (such as gambling) may also be related to mental health disorders.<sup>95</sup> For example, it is common for gamblers to report depression as a result of debt from gambling.<sup>44</sup>

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### Summary

It's clear from the evidence that using credit cards to gamble is associated with multiple forms of harm. Resource-related harms that are most evident include participation in illegal activities (such as fraud) and financial difficulties; relationship-related harms are seen in strained relationships with loved ones and negative family impacts; and health-related harms are noted primarily in poor mental health. In addition, credit card use may indicate of increased borrowing from other sources including unsecured loans, pawning, and loan sharks. These other forms of borrowing come with increased risks to the gambler and may be symptomatic of problem gambling.

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**Health-related harms:**  
Physical harm,  
psychological distress, or  
impaired mental health.

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## JURISDICTIONAL SCAN

The following provides a brief overview of some of the key initiatives related to banning or restricting credit card use for gambling that are occurring globally. Initiatives can be broadly categorized as public consultation to inform policy, imposing limitations on land-based credit use, and imposing limitations on online credit card use. At the time of this brief, no evaluations of credit card bans or limitations were available. The Gambling Commission will therefore likely be the first to undertake and publish such an evaluation.

### Public consultation

#### New Zealand

The Government of New Zealand opened a public consultation in August 2019 to determine how gambling regulations should be altered to reflect changes in the online gambling environment since the Gambling Act was created in 2003.<sup>96</sup> One measure being considered is to block credit card use on gambling websites that are not licensed in New Zealand, or to ban the use of credit cards for online gambling altogether, including for those currently licensed in New Zealand.<sup>97</sup>

### Limitations on land-based credit card use

#### Australia

All Australian state and territories have government restrictions that limit cash advances from credit cards from cash machines and debit payment systems in land-based venues.<sup>49</sup>

New South Wales state legislation prevents the use of credit cards for gambling on machines in land-based venues.<sup>98</sup> Gambling machine players must bring cash, withdraw cash from a cash machine, or pre-load a cashless card with cash to play.<sup>48</sup> The current legislation does not apply to online gambling and therefore does not ban the use of credit cards to gamble online.<sup>48</sup> The acceptance of credit cards to gamble online has been seen as in conflict with land-based regulations.<sup>98</sup>

The legislation includes additional restrictions to prevent harm, such as prohibiting cash machines and debit machines from the gaming floors in New South Wales casinos and from permitting cash advances.<sup>48, 99</sup>

The four major banks in Australia permit gambling transactions on credit cards for most forms of gambling, with the exception of gambling machines, while multiple other financial institutions do not.<sup>47</sup>

### Limitations on land-based credit card use continued

Canada	Manitoba prohibits credit card use in casinos. <sup>100</sup>
Japan	Residents are not allowed to use credit cards to buy casino chips. <sup>101</sup>

### Limitations on online credit card use

Australia and New Zealand	<p>Lasseters Online (a government regulated online casino in Australia) limits monthly credit card deposits to \$500 initially, which is raised to \$2500 when age and residence is verified. Credit cards can only be used to deposit money into the player's account. Credit cards with unlimited lines of credit are not eligible for opening accounts.<sup>102</sup></p> <p>In Australia and New Zealand, online gamblers cannot use their credit cards from ANZ Bank to gamble if they have used 85% or more of their credit card limit, or if the attempted transaction would push their balance to 85% or more of their credit card limit.<sup>103</sup></p> <p>Credit card holders with ANZ and Westpac banks have the option to block all gambling transactions.<sup>47</sup></p>
Finland	The government regulated operator, the only business permitted to operate land-based and online gambling in mainland Finland, does not permit paying with credit cards. <sup>110</sup>
Netherlands	In 2008, the Netherlands Ministry of Justice introduced measures that imposed criminal penalties on banks and credit card companies that facilitated Dutch citizens gambling on foreign-owned sites. <sup>18</sup>

## Limitations on online credit care use continued

<p>South Africa</p>	<p>In 2010, foreign operators were banned from accepting bets from South African citizens. Banks and credit card companies have blocked South Africans from using their credit cards on online gambling sites.<sup>18</sup> <i>Note: online gambling is currently illegal in South Africa.</i> However, some external online betting sites, based outside of South Africa, have been given licenses to accept bets from citizens of South Africa.<sup>111</sup> The banning of credit card use for online gambling helps enforce this for external online betting sites that have not received licenses by the National Gambling Board.</p>
<p>United States</p>	<p>Many credit card companies and banks have banned the use of their credit cards for online gambling.<sup>74</sup> This is to avoid illegal transactions and lawsuits<sup>104</sup> and because debt collection cannot be used to recover gambling losses.<sup>105</sup></p> <p>Major credit card networks, such as Visa and MasterCard, have developed transaction codes that banks can use to block suspect payments.<sup>104</sup></p> <p>The ability to buy a lottery ticket with a credit card varies by state. Credit card companies want to permit their cards to be used for state lottery when the state allows.<sup>106</sup></p> <p>PayPal has blocked online gambling operators from players based in New York State. This followed an inquiry by the New York Attorney General.<sup>107</sup></p> <p>The Unlawful Internet Gambling Enforcement Act (UIGEA) is the prominent U.S. legislation intended to protect against illegal internet gambling.<sup>24, 106</sup> It prohibits gambling operators from accepting payments in connection with illegal gambling, including those made via credit cards, electronic funds transfers, and cheques.<sup>108</sup></p> <p>In practice, the UIGEA payment prohibitions are difficult to enforce. Its attempts to modify regulations that would force financial institutions to block money transfers from illegal gambling did not materialize. This was due to difficulties in defining the term "unlawful",<sup>106</sup> and to constraints with respect to tracking individual transactions,<sup>106</sup> with many online gambling sites ensuring that credit card and banking statements do not reveal transactions as gambling.<sup>24, 109</sup> The prohibitions can also be circumvented by players who deposit money into non-U.S. financial transaction intermediaries.</p>

## Summary

Across jurisdictions, bans and restrictions take the form of: financial institutions banning or limiting the use of credit cards for online gambling, credit card holders blocking gambling transactions, limitations on the use of credit cards in casinos, and efforts to prevent using credit card payments in connection with illegal gambling. Comparatively, New Zealand and Australia have the most comprehensive approaches to credit card bans and restrictions, as initiatives found in other jurisdictions appeared to be standalone initiatives. It will be useful to follow the outcomes of the public consultation being led by New Zealand, and to connect with stakeholders there to understand possible models for a ban or restrictions being considered.

## CREDIT CARD BAN: INTERNATIONAL PERSPECTIVES

There is some evidence that the harms of gambling can be addressed through financial restrictions, although harms may be likely to re-occur if restrictions are removed.<sup>112</sup> Researchers, gambling specialists, counsellors, and problem gamblers themselves have all endorsed prohibiting access to funds from credit cards at venues (e.g., from cash machines, on gambling machines, portable machines that can be used at a gaming table) as a method to reduce the harms from gambling.<sup>53, 113</sup>

The Gambling Commission in Austria argues that banning credit card use in land-based venues is a low cost option to help minimize gambling harm among moderate-risk and problem gambling, while having few costs for non-problem gamblers and other venues.<sup>49</sup> Moreover, they argue that credit card bans are warranted in combination with other withdrawal limits or pre-commitment (i.e., a tool to set money and/or time limits before starting to gamble<sup>19</sup>) schemes.<sup>49</sup> However, the policing of such restrictions would be difficult. Two potential ways to compromise credit card coding systems include: (1) by internet gambling merchants who attempt to disguise their transactions by miscoding them,<sup>114</sup> and (2) by cardholders who attempt to circumvent the system by using other online payment methods.<sup>107</sup>

Researchers and policy makers have advocated placing restrictions on the number of credit cards and bank cards that can be used simultaneously, to reduce fraud, underage play, and excessive spending.<sup>18, 67, 115</sup> Setting a monthly maximum deposit for gambling with credit cards might be an additional way

In the United States, the ban on credit cards has been implemented with transaction codes. Specifically, financial institutions in the United States have created transaction codes to identify gambling transactions. These codes are assigned by the merchant when paying for good/services. If the financial institution receives a credit card charge with a gambling transaction code, they will deny the transaction. In this way, the responsibility for the ban is put on both merchants and financial institutions.

to help prevent fraud, money laundering, and excessive spending, as Lasseters in Australia and New Zealand have done.<sup>102</sup> Lasseters has also banned the use of credit cards with unlimited lines of credit.<sup>102</sup>

Another notable measure, applied in both Australia and the USA, has been to ask credit card issuing banks to block the card's use for gambling transactions.<sup>107</sup> Some financial institutions in Australia and the UK have started offering credit card customers the option of blocking gambling related transactions.<sup>47</sup> Similarly, online gamblers in Australia and New Zealand cannot use their credit cards from ANZ Bank to gamble if they have used 85% or more of their credit card limit, or if the attempted transaction would push their balance to 85% or more of their credit card limit.<sup>103</sup>

Financial institutions have increasingly recognized the need to help gamblers avoid accumulating unmanageable debt and are considering options to assist with minimizing gambling related harms.<sup>47</sup> For example, financial institution may allow players to block gambling transactions or set expenditure limits.

In 2006, the Florida Council on Compulsive Gambling focused on the impact of credit card use and suggested a number of regulatory and policy changes to help prevent gambling harm.<sup>7</sup> The most notable of these include:

- › Encourage sharing of credit fraud information broadly among members of the gaming industry
- › Ensure gambling debt is reportable to the credit rating companies
- › Limit the availability of credit to college students
- › Develop working partnerships between treatment providers, industry, and representatives of the financial industry, that focus on the credit related signs of problem gambling
- › Engage the banking and credit card industries in discussions and partnerships to impact the misuse of credit for gambling

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## Summary

Policy makers in different jurisdictions have taken diverse approaches when considering a ban on credit cards. These include, banning credit card use in land-based and/or online environments, restricting the number of payment options that can be used simultaneously, and setting and enforcing maximum deposits. Most of these require the cooperation of financial institutions or the gambling operators themselves to restrict gambling transactions using credit cards. Given the lack of empirical evaluation on the effects of credit card bans, it is important that regulators work with both the financial institutions and gambling operators to create policies that are realistic and feasible.

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## UNINTENDED CONSEQUENCES

Bans will often lead individuals to find creative and innovative solutions to bypass bans and restrictions. Without the ability to obtain credit from financial institutions or a gambling company, other legal methods a gambler may turn to for funds include payday loans, pawning/selling goods, and loan sharks. As detailed above, the high interest associated with these sources of credit can often lead to a cycle of indebtedness.<sup>20, 23</sup> In the case of payday loans in particular, gamblers who resort to this type of credit may be more vulnerable to problem gambling, possibly a result of poor financial planning from a tendency to devalue future events.<sup>116</sup>

Finally, when all formal and informal forms of legal borrowing have been exhausted, gamblers may turn to illegal activities,<sup>2, 73-75</sup> such as embezzling funds, stealing from an employer, and bank fraud to fund gambling.<sup>76</sup> In the case of credit card bans, this may lead individuals to use more anonymized forms of payment, such as eWallets and prepaid cards. The movement towards these payment forms may be an unintended consequence of banning credit cards.

Many gamblers already choose to use eWallets. These are online accounts in which money can be deposited and used for transactions, and function similarly to a bank account.<sup>117</sup> Importantly, the eWallet is funded through a customer's bank, credit card, or debit account.<sup>118</sup> If credit cards are banned directly to fund gambling, the use of eWallets and other online payment providers may be an easy way to circumvent denial by financial institutions or credit card networks based on transaction codes.<sup>24, 119-121</sup> In addition, eWallets are a payment method available to gamblers who are unable to obtain a credit card (e.g., those with low credit scores, underage, undocumented, etc.).<sup>122</sup> Concerns have been raised about the use of prepaid credit cards by youth and those with poor credit for gambling, providing these groups with a means to gamble with borrowed money that may have not been traditionally available to them.<sup>66</sup> This may result in harm from use of funds for gambling, in the form of prepaid credit cards, by those who are poorly situated to best manage their spending. It also means that the source of funds to purchase the prepaid credit cards is unknown to operators.

The appeal of using prepaid credit cards and eWallets is the anonymity they provide. It is unclear how operators are able to manage accounts created with prepaid credit cards or eWallets, as these may not be linked to an identified individual if there is no other system of identity verification in place.<sup>18</sup> This risk should not arise in the British context however, where the verification of a customer's identification is now required before being allowed to gamble, with credit cards not an acceptable form of identification for this purpose. Interestingly, use of eWallets, as well as use of other anonymized payment methods may be protective.<sup>123</sup> Research has found that those using eWallets and prepaid credit cards are less likely to self-exclude, suggesting that use of these payment methods could reduce gambling harm. A possible reason for this is that these payment methods could facilitate a process similar to pre-commitment, wherein the gambler funds the eWallet or prepaid credit card with a preset amount they are willing to lose.<sup>123</sup> Therefore, it is unclear if the use of eWallets as an unintended consequence will be harmful or beneficial, which highlights the need for robust evaluation.

Banning credit cards for online gambling may also have the unintended consequence of undermining other harm minimization efforts.<sup>16</sup> Banning credit cards may increase the cost for businesses to comply with the ban and they may be more likely to take their business to less regulated jurisdictions.<sup>16</sup> Banning credit cards may also cause inconvenience for gamblers, who may turn to unregulated offshore providers which do accept

credit cards.<sup>16, 47</sup> The end result may be that operators and consumers both turn to less regulated (and less safe) options, undermining harm minimization efforts.<sup>16</sup> However, it may only be committed gamblers who resort to using unregulated foreign online banks, or non-internet based forms of money transfer to continue to gamble online.<sup>120, 124</sup>

## Implementation considerations

There are logistical issues with banning the use of credit cards for online gambling. For example, if credit cards are to be restricted or banned, it will be important that operators are prohibited from referring customers to other lenders and sources to pay off gambling debts.<sup>83, 98</sup> Specifically, in Australia, concerns have arisen that, due to cooperation between offshore online gambling and payday loan companies, gambling sites may advertise or direct gamblers towards lending outlets.<sup>83</sup> Direct links online from gambling companies to payday lenders are prohibited in Australia.<sup>47</sup>

Some providers may try to bypass credit card restrictions. For example, there is evidence that some gambling providers deliberately try to disguise credit card transaction codes to avoid any denial based on Internet gambling transaction codes.<sup>24, 109, 119</sup> Some authors have gone so far as to argue that the identification and restriction of online gambling transactions “is a difficult if not impossible objective”,<sup>119</sup> especially with increased encryption and reliance on electronic money.<sup>24, 47, 109, 115, 119, 121</sup> There is no way for an operator to know where exactly the money to gamble is coming from (e.g., payday loans, loan sharks, illegal activity, or overdraft). Instead of adopting a broader approach to harm reduction, the regulator may limit the intervention to only blocking transactions with credit cards. This then shifts the responsibility for harm reduction away from the regulator and primarily onto operators or financial institutions.<sup>48</sup>

There have been also been reports of gamblers who have self-excluded due to credit card debt, but then once reinstated, have been able to use credit cards to gamble once again and get into serious debt.<sup>89</sup> Therefore, it is important for operators to track the causes of self-exclusion and to help gamblers control their spending. Problem gamblers also frequently use a range of other control strategies to restrict their own access to money, including leaving credit cards at home.<sup>112, 125, 126</sup>

Use of credit cards may provide a credit predetermined limit (as discerned by the financial institution). As opposed to Payday loans and other unsecured loans, a credit card transaction will be rejected if the credit limit has been reached, stopping the player from spending money over their bank-determined limit.<sup>127</sup>

Some lottery retailers have also raised concerns about credit card bans, as customers often purchase other items at the same time as lottery products.<sup>99</sup> This could inconvenience customers if they must pay for purchases separately with different methods of payment.<sup>99</sup> This problem was identified in the United States; customers were able to get around a credit card ban for lottery if the store simply coded the purchase as groceries.<sup>106</sup> Some gamblers have raised concerns about the ability to use credit cards for lottery products, as increased convenience may lead to potential problems.<sup>128</sup>

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## Summary

Banning credit cards may result in unfavorable unintended consequences, such as movement towards anonymized forms of payment for gambling, which could undermine harm minimization efforts. It is also possible that desperate gamblers may turn to illegal or otherwise fraudulent means to access money to gamble with (e.g., crime, loan sharks, etc). However, the link between gambling and crime is unclear – for some individuals crime may result from a desperate need to fund gambling activities, while for others gambling may result from participation on other illegal activities (for a brief overview of the link between gambling and crime, please see GREO White paper: Problem Gambling and Crime and its Costs<sup>129</sup>).

Additionally, there may be several challenges to banning credit cards which may lead players and operators to try to bypass the ban. In order to monitor any changes or consequences due to a ban, it is important that best practices and standards are adhered to when collecting and reporting payment information across operators. This data will be crucial to help inform a systematic evaluation that could be conducted if ban policies were enacted, to determine if any of these unintended consequences do occur.

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## SECTION 2: DISCUSSION

Many arguments about gambling and credit cards have been made, but empirical evidence on the issue is still in its infancy. As such, it is challenging to make recommendations without a share of caution. An important component of implementation is a robust evaluation, as not all unintended consequences may be captured in this review.

A limitation of the review is that, due to the time restrictions of a rapid review and the scarcity of evidence of this topic, assessments of risk of bias, and quality of evidence of the quantitative and qualitative papers was not conducted. As such, the quality of empirical studies included varies, and is generally limited and methodologically weak. A recent review of gambling and credit by Swanton and Gainsbury<sup>54</sup> in 2019 came to a similar conclusion about the state of the evidence. Specifically, they state that, “This area has received limited research attention and been hampered by conceptual and methodological issues”. They also note that many studies on the topic have used different definitions of “debt” and have depended on individuals to report their own levels of debt, both of which can lead to inaccuracies in reporting and analysis.

In addition, it is important to contextualize any research within the time period it was conducted. This is particularly important in this case, given the speed and frequency of advancements in credit card technologies, cultural shifts, and changes in gambling and responsible gambling.

The nature of how harm is defined has also evolved over time. Earlier research may not fully explore the depth and breadth of harms experienced by those who gamble. While it is beyond the scope of this review to examine these changes, it may be helpful to refer to the Gambling Commission’s framework of harms.<sup>55</sup> Specifically, while there was research on resource and relationship-related harms, there has been little research about health-related harms in connection with credit card use and gambling.

We also recognize that there is a need for more interdisciplinary research on this topic. Other disciplines might bring unique perspectives (and understanding of harm) into the effects of credit card use in gambling. For example, further study could include a focus on those who are disadvantaged or vulnerable (e.g., new immigrants who are often targeted with credit card offers).

Despite these limitations, there is moderate to strong evidence that credit card use is related to gambling harm, but the direction of that connection is yet to be determined. To understand causal links, it is necessary to study the use of credit cards over a gambler's lifetime.<sup>54</sup> To date, there is limited evidence about the characteristics that define problem gamblers who use credit cards.

### Identified evidence gaps and future directions

This review identified some significant gaps in the evidence in relation to three main areas. There were no studies captured that specifically looked at player motivations to use credit cards to gamble. The Gambling Commission is currently obtaining related data as part of the larger consultation on the issue of credit cards and gambling.

Absent as well were studies or reports that compared different types of borrowing and their differing impact on the development of gambling harm. For example, how credit card use interacts with or leads to unsecured loans over time, and the differing impacts on gambling harm. Future research could consider examining the impact of credit cards using a life-course analysis. Doing so will help to identify causality over time. It may also help to determine the impact of credit card use across different age ranges and across different instances of gambling initiation.

Credit cards are the most frequently used and accessible form of credit, and the form of credit most easily used for fraudulent purposes. However, a larger concern may be with accessing credit and leveraging it against family assets. For example, a gambler may take out a loan on a house or car to fund gambling activities. More research is needed to determine the frequency and extent of harm that may result from such activity.

Lastly, there is a clear need for robust evaluation of the impacts of a credit card ban on reducing gambling related harm. Through our evidence search, we were unable to identify any evaluations of current bans. It would be useful to fund research that would establish baselines which could then be compared at various time periods after a ban was enacted.

One notable limitation of the current rapid evidence review is that we did not specifically target literature surrounding the use of cash machines to gamble. Given that players can use their credit cards at cash machines, there is the possibility that the location and ease of access to cash machines (e.g., on or near the gambling floor) could entice gamblers to go into overdraft or take out a cash advance on their credit card. To help address this issue, some jurisdictions in Australia have put a limit on the cash withdrawals at cash machines in gambling venues, and others have banned cash machines from the gambling floor altogether. For further information on the effects of cash machines on gambling behavior, please see the report *Research into the separation of ATMs and gaming machines in NSW*.<sup>130</sup>

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## Recently published review on Gambling and Credit

During the creation of this rapid evidence review, a similar review was published, 'Gambling related consumer credit and debt problems: A brief review', by Australian gambling researchers Thomas Swanton and Sally Gainsbury,<sup>54</sup> Although not credit card specific, they also describe how problems with debt have been shown to both precipitate and be a result of problem gambling. The authors come to the same overall conclusion that we outline above regarding the limited number of empirical studies (and studies in partnership with financial institutions) on the specific types and patterns of borrowing that may worsen these problems.

Specifically, the review concludes that use of consumer credit products and associated problems with debt are risk factors for problem gambling severity, separate from any socioeconomic factors. Also, that problems with debt seem to contribute to poor psychosocial functioning, on top of the problems associated with problem gambling on its own.

Based on these conclusions, the authors recommend that governments address gaps in consumer credit legislation (as it pertains to non-traditional lenders as well), to protect those experiencing gambling problems. This includes considering prohibiting the use of credit cards for gambling. Consumers should at least be able to block or limit their use of credit through their financial institution or payment system when gambling electronically. Additional recommendations call for financial institutions to develop preventative protocols, like customer care calls, and to ensure credit limit increases are not offered to those who have disclosed problem gambling. Lastly, the authors recommend screening for gambling problems during debt counselling, and screening for debt problems during problem gambling counselling.

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## INFORMING PHASE 2: THEORY OF CHANGE

The rapid evidence review, in addition to consultation with evaluation experts in the field, did not identify any completed or planned evaluations of credit card restrictions or bans that could be used to inform the theory of change. The review did, however, highlight several factors that should be considered in relation to the conceptual underpinnings of the theory of change. While an in-depth exploration of how these factors may inform the theory of change are beyond the scope of this review, these factors provide a useful starting point for asking important questions. These factors are not exhaustive and should be considered within the context of relevant behaviour change theories, best practices in harm minimization, the evaluation consultant's expertise, and fulsome stakeholder engagement.

Consideration of the potential positive and negative impacts of a restriction or a ban at an individual and societal level are useful to consider when articulating the intended outcomes of in the theory of change. Throughout the review, it is apparent that reducing access to credit cards for gambling could reduce individual harms for problem gamblers and their families/loved ones. The benefits of reduced credit card access may include: increased sense of responsibility for debt; enhanced awareness of how much has been spent; an imposed cool off period; and reduced or eliminated possibility of credit card fraud between the gambler and their friends or family. These benefits could theoretically include improved relationships, mental health, and financial health. Negative unintended consequences of restrictions or bans could include gamblers shifting to higher risk/higher interest forms of debt, possibly negating some of the benefit of any restrictions.

The expected benefits on a societal level were not addressed in the evidence, although one could reasonably propose that healthier players (financially, emotionally, and physically) will contribute to reduced population level harms and a more sustainable player base for the industry. The negative societal factors could include some types of fraud (unauthorized transactions, breached sites, charge back) and costs to businesses (costs to businesses to comply, shift to unregulated market, and loss of revenue).

When any intervention is intended to influence health outcomes as a function of regulating access, care should be taken to clearly articulate why and through which mechanisms changing access is anticipated to result in positive outcomes and for whom. The likelihood of achieving these positive outcomes, in light of the possible negative outcomes or barriers to implementation, should also be considered carefully. Additionally, the relationship between other intervention components on the desired outcomes, such as player education, staff training, and features of the land-based or online environment (not covered in the rapid review) should be considered.

Several limitations of credit card restrictions and bans, including unintended negative consequences, were identified in the literature. These limitations could have significant implications for the theory of change's expected outcomes and proposed causal mechanisms, such as:

- › Permitting eWallets while restricting or banning credit cards may undermine effectiveness
- › A land-based only intervention may be relatively ineffective if gambling online with credit cards remains unimpacted
- › Harms may simply be transferred, such as a gambler moving from credit cards to higher risk forms of borrowing
- › The cost or difficulty of enforcing the restriction/ban may reduce financial institution and merchant compliance and the intervention's fidelity
- › These limitations are also an important reminder of the need to:
  - › Clearly articulate the external factors that may influence the restriction or ban's effectiveness, outside of the direct control of the intervention and
  - › Spend adequate time considering what level of harm reduction can reasonably be expected from a restriction/ban. Similarly, in which instances the benefits of promoting health may have standalone benefits, outside of whether an individual's gambling behaviour and harm is significantly impacted. Reviewing other areas of public health interventions that operate through regulating access, such as tobacco and alcohol, may provide useful insight into the development of the theory of change.

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