

EVALUATION SNAPSHOT

EVALUATION TYPE: Process and Outcome Evaluation

EVALUATION METHODS: Interviews, Pre & Post survey data

Evaluation of the credit card ban for gambling in Great Britain

About the Intervention

Credit card use in gambling

Evidence suggests that the use of a credit card is associated with greater harms among people who gamble. Credit cards provide a convenient means of borrowing to fund gambling, which can facilitate significant gambling-related debt. This can lead to direct and indirect gambling-related financial harms.

Prior to the UK's credit card ban, analysis for GambleAware of 2018-19 data indicated that 5.7% of overall deposits into online gambling accounts were made by credit card, and UK Finance estimated that 800,000 adults used credit cards for gambling. In this study, people who gamble with big wins and big losses, and those who made use of safer gambling tools were the most likely to use a credit card for gambling.

Credit card ban implementation

Great Britain was the first country to implement a complete ban on credit card use for online and offline gambling (apart from non-remote lotteries) in April 2020. The ban prohibited licenced gambling operators from accepting payment by credit card, including payments through a money service business. The ban was unable to cover some forms of direct use of credit cards for gambling, such as purchasing national lottery tickets alongside other items (e.g., groceries). The credit card ban was designed to add friction to the process of gambling with borrowed money, adding a layer of protection to vulnerable people to reduce gambling-related harms. It is important to note that the ban was implemented at the beginning of the COVID-19 pandemic.

Need for this evaluation

While other jurisdictions have implemented similar policies to ban the use of credit cards for gambling to various degrees, no other jurisdictions had implemented a complete ban on the use of credit cards for gambling at the time of this evaluation. The availability of evidence of the likely impact and effectiveness of this strategy is limited, particularly regarding the risk of substitution of credit card use with other sources of borrowed money.

Purpose of the Evaluation

The purpose of the evaluation was to assess the impact and effectiveness of the credit card ban for gambling. The evaluation had the following objectives:

1. Determine the degree to which the credit card ban has been implemented as intended.
2. Examine the extent to which credit card users changed their gambling behaviours as a result of the ban.
3. Understand the impact on gambling-related financial harms experienced by people who gamble with borrowed money.
4. Understand the impact of the credit card ban on affected others and people who gamble who are not currently experiencing harm.
5. Examine how the COVID-19 pandemic interacted with the implementation and outcomes of the credit card ban.

This evaluation was conducted by the National Centre for Social Research (NatCen). The evaluation team took a mixed method, theory-based approach. Evaluation activities were conducted in three streams:

1. Scoping phase

An evaluative framework was developed based on a pre-existing Theory of Change (ToC) for the credit card ban and included measures for each of the credit card ban's outputs, outcomes, and assumptions. The ToC described and illustrated how and why the credit card ban was expected to achieve its desired outcomes. The focus of the evaluation was on the degree of implementation of the ban, changes in payment and borrowing practices for gambling activities, and the impact of the ban on people who gamble and affected others. The evaluation also considered possible unintended and unanticipated consequences of the credit card ban. Many factors not directly related to credit card use, including the COVID-19 pandemic, may have affected changes in these behaviours and outcomes, so the evaluation was designed to take into consideration these complex and uncertain cause-effect relationships.

2. Quantitative data

Quantitative data were drawn from an existing Online Tracker Survey, commissioned by the Gambling Commission and administered by

Yonder. This survey collects cross-sectional data quarterly from a nationally representative sample of about 2000 adults in Great Britain. Cross-sectional survey data pre- and post-credit card ban were used to explore how key outcomes including gambling risk classification, use of safer gambling tools, use of credit cards, and other borrowed money for gambling varied before and after the ban. An additional module was designed for the Online Tracker Survey to ask retrospectively about the impact of the credit card ban. Questions from this module were used to address areas that could not be tackled with the existing cross-sectional data, such as the impact of the COVID-19 pandemic.

Five pre-ban waves (December 2018-March 2020, n= 10427) and two post-ban waves (March-June 2021, n=4140) of the quarterly Online Tracker Survey were included in the analysis. The cross-sectional quantitative analysis was conducted in stages. A weighted preliminary analysis was conducted to compare outcomes from the survey wave just prior to implementation of the credit card ban with outcomes from the survey wave reflecting the immediate post-ban period. Four

additional analyses were conducted using a pooled dataset including all pre- and post-ban survey waves: 1) the preliminary analysis was re-run using this pooled dataset, 2) binary logistic regression models were estimated to identify whether the ban was related to a person's odds of experiencing each of the five outcomes, 3) additional control variables were added to the model, adjusting for age, ethnicity, socioeconomic status, marital/relationship status and Problem Gambling Severity Index (PGSI) category and 4) a logistic regression model stratified by PGSI categories. A descriptive analysis was conducted on the retrospective post-ban survey questions.

The PGSI is a widely used index of 'Problem Gambling' that scores individuals on a scale of 0 to 27. The PGSI category names can be stigmatizing and may downplay the fact that anyone can be at risk for gambling harms. In order to ensure enough sample size to make accurate estimates, people experiencing a moderate or high level of problems from gambling have been combined into a single category. For these reasons, the following terminology will be used to reference the PGSI categories throughout this snapshot.

- **PGSI score of 0:** People experiencing no reported problems from gambling (often referred to as 'non-problem gamblers').
- **PGSI score of 1-2:** People experiencing a low level of problems from gambling (often described as being at 'low risk').
- **PGSI of 3+:** People experiencing a moderate or high level of problems from gambling (often described as 'moderate risk' or 'problem gamblers').

A potential concern around the use of the PGSI was that there may be conceptual overlap between items in the index, which include the item, "*Have you borrowed money or sold*

anything to get money to gamble?" and the tracker survey questions measuring people's borrowing behaviour. The authors explored this by assessing correlation between PGSI items and overall use of any borrowed money to gamble. There was a correlation ($r=.50$) between the PGSI item, "*Have you ever borrowed money or sold anything to get money to gamble?*" and the overall use of any borrowed money to gamble. However, given all other PGSI items also had a similar correlation to overall use of any borrowed money to gamble, it was deemed appropriate to proceed with the use of PGSI scores.

There are some limitations of these quantitative data including: the collapse of PGSI scoring categories of three or more, the use of online tracker survey data, the confounding timing of the COVID-19 pandemic with ban implementation, and the lack of a control group to compare how gambling behaviours may have changed in the absence of a credit card ban. The use of the online tracker survey has limitations because it is based on self-report on behaviours over the previous 12 months and may be subject to recall error, the data is cross-sectional and provides a point in time assessment of respondents' PGSI category, and there have been small changes in some of the survey questions over time. There was also a significantly higher proportion of people experiencing a moderate or high level of problems from gambling in the post-ban survey waves as compared to pre-ban waves. These limitations prevent the establishment of a causal link between the credit card ban and changes in gambling behaviour.

3. Qualitative data

Interviews were guided by a semi-structured topic guide to explore experiences and perspectives of different people in relation to

credit card use for gambling. To draw a diverse picture from those most likely to be impacted by the credit card ban, interviews were conducted with the following groups:

Organisational stakeholders (n=7)

These organisational stakeholders shared insights about their experience in implementing the credit card ban and their observations of its overall effects. This sample was recruited by direct contact via email and included three gambling treatment/ support providers, three gambling operators, and one financial operator. Credit card company representatives did not respond to invitations for interview.

People who gamble (n=20)

Twenty individuals with lived experience of gambling with a credit card before implementation of the ban were interviewed. Interviews explored the impact of the credit card ban on participants' gambling behaviour, use of borrowed money to gamble, experience of harms, recovery from harms, alternative gambling solutions (e.g., unlicensed or black-market operators to bypass the ban), and use of safer gambling strategies and supports. Whether participants still used a credit card for gambling or stopped gambling altogether post-ban varied among participants. Participants were recruited primarily from a purposive sample of Online Tracker Survey participants. A few participants (n=3) were recruited via targeted social media posts.

Affected others (n=7)

Seven individuals who have been directly impacted by an individual's gambling, such as family and friends of people who gamble were recruited through organisations supporting affected others and through social media. These interviews explored similar topics as the interviews with people who gamble from the

perspective of affected others, in addition to the broader impact of their relationships with people who gamble and the wellbeing of affected others.

The major limitation of the qualitative strand was that the sampling strategy was purposive and not representative. The majority of people who gamble reported either having experienced problems with gambling in the past (but not at the time of the interview) or having never experienced problems with gambling. It was also not possible to recruit participants from each intended target demographic category (e.g., people with a disability, people from the LGBTQ+ community, or people with different income levels were not represented). Additionally, because the primary intent of recruiting organisational stakeholders for interviews was to facilitate the design of the topic guides for people who gamble and affected others, the views of those interviewed do not reflect the experience of all those who implemented or experienced the ban. Taken together, these limitations require caution in the generalisability of any findings from the three groups interviewed (organisational stakeholders, people who gamble, and affected others).

Qualitative analysis was conducted through a combination of inductive thematic analysis and deductive theory-informed analysis. All interviews were initially analysed using an inductive approach, and the interviews with people who gamble were additionally analysed using deductive approach. Findings from these streams were triangulated and synthesised to report on the extent to which the credit card ban was effective in achieving its intended outcomes. Recommendations and future refinements to the intervention were also drawn from these data.

What were the key findings?

Implementation of the ban

Organisational stakeholders identified the following facilitators and barriers to implementation of the credit card ban:

↗ Facilitators

- Mandatory and industry-wide nature of the ban.
- Pre-existing good working relationships between gambling operators and financial and payment operators to support practical aspects of implementation.

↗ Barriers

- Technical challenge of credit card identification.
- Limited involvement of financial institutions and lack of coordination and collaboration between all parties for implementation.
- Short implementation timetable.
- Lack of helpful implementation guidance.
- Implementation challenges caused by the COVID-19 pandemic.

↗ Awareness of the ban

One quarter (25%) of survey respondents from the general population were aware of the credit card ban 18-20 months after it had been introduced. Awareness of the ban increased with increased gambling risk classification. After the credit card ban implementation, people who were experiencing a moderate level or high level of problems from gambling were more likely to be aware of the ban (57%), compared to people who were experiencing a

low level of problems from gambling (29%), those experiencing no reported problems from gambling (23%), and people who did not gamble (11%).

In interviews, people who gambled with credit cards found out about the ban through many channels: emails from gambling operators, pop-up messages on gambling websites, and social media. It was felt by some that the ban could have been advertised through more channels and from more sources to reach different population groups including affected others and older people. Many people who gamble would have preferred to have more notice prior to the credit card ban implementation.

↗ Perception of and understanding of the ban

Overall, the ban was perceived by interview participants to be a positive change and a step towards reduction of harm from credit-based gambling.

People who gamble and affected others demonstrated a clear understanding of why the ban was implemented. Some expressed regret that the ban had not been implemented earlier. Alternatively, some people who gamble perceived the ban to negatively alter how they could gamble due to having limited access to money.

Gambling treatment/support providers were concerned that the ban was not comprehensive enough as it did not address other types of borrowed money. Both gambling treatment/support providers and affected others also raised the concern that people who experience problems from

gambling may find ways around the ban (e.g., digital wallets, crypto and black-market websites).

Gambling operators would have preferred a risk-based approach as they believed many of their customers did not experience financial harms from using a credit card for gambling.

Impact on gambling patterns and behaviours

↗ Use of credit cards and borrowed money for gambling

Amongst all survey respondents pre- and post-ban, most had not used any borrowed money for gambling in the last 12 months. Among those who did self-report borrowing for gambling, credit cards were the most commonly reported means.

In an unadjusted analysis of all respondents who said they gambled in the March 2021 post-ban survey, 8% said they had used a credit card to gamble in the past 12 months, which was not a statistically significant difference from reported pre-ban rates from the March 2020 survey. Among those who gambled using a credit card post-ban, 74% said they used a credit card directly to pay for gambling and another 51% said they used a credit card indirectly. Reported methods of credit card use following the ban included: the deposit of funds into a digital wallet, the purchase lottery or scratch tickets alongside other shopping, using a money transfer card, withdrawal of cash from a credit card, and adding the cost of gambling to a phone bill. A very small proportion of respondents reported using a credit card on a gambling website or in a physical gambling venue. While the use of a digital wallet topped up by credit card, and use of credit cards for direct payment for gambling were reported, this should not have been possible under the credit card ban, and may have been due to recall error.

In adjusted models that accounted for demographic characteristics (age, gender, ethnicity, marital status, socioeconomic status) and PGSI status, there were differences seen in the likelihood of use of credit cards post-ban compared to pre-ban:

- All respondents in post-ban survey waves were less likely to report the use of a credit card for gambling (adjusted odds ratio (AOR) of 0.82)
- People experiencing a moderate or high level of problems from gambling were more likely to report the use of a credit card for gambling (AOR of 1.36)
- People experiencing a low level of problems from gambling and people experiencing no reported problems from gambling were much less likely to report the use of a credit card for gambling (AOR of 0.29 and 0.43, respectively)

A similar pattern was seen in the likelihood of use of any borrowed money for gambling:

- All respondents in post-ban survey waves were less likely to report the use of any borrowed money for gambling (adjusted odds ratio (AOR) of 0.65)
- No difference was observed in the likelihood of people experiencing a moderate or high level of problems from gambling of reporting the use of any borrowed money for gambling.
- People experiencing a low level of problems from gambling and those experiencing no reported problems from gambling were much less likely to report the use of any borrowed money for gambling (AOR of 0.38 and 0.35, respectively)

If the changes above are due to the credit card ban, it appears that controlling for sociodemographic characteristics the ban has worked best for people experiencing a low

level of problems from gambling, but has not changed the behaviour of people experiencing a moderate or high level of problems from gambling.

↗ Experience with credit card ban

In response to the credit card ban, there was a range of reactions, including attempts to bypass the ban, switching to alternative payment methods, and stopping credit card use beforehand. Some people who gamble reported making credit card deposits in anticipation of the ban, or briefly used credit cards post-ban via digital wallets.

Emotions related to ban were also mixed, with some people who gamble feeling relieved to be able to reduce debt levels or feeling less alone in relation to gambling, while others felt regret that the ban had not been implemented earlier. Additionally, some expressed annoyance at the inconvenience of needing to change their payment methods. Affected others often experienced positive emotions such as a reduction of stress and worry.

Qualitative data showed that the credit card ban prompted some reflection on certain aspects of gambling behaviour. Strategies considered by individuals who gamble included creating a dedicated debit account with a fixed monthly deposit to control spending, reducing the number of gambling accounts, and budgeting for gambling spending after bills are paid.

Some individuals with credit card debt and frequent gambling reported seeking alternatives to credit cards as sources of funds for their gambling activities and shifted towards using credit cards for daily expenses. Conversely, those with lower levels of gambling and no existing debt did not report this substitution. Instead, the ban provided a chance for introspection for some, leading to some cases where individuals chose to reduce their overall gambling activities.

Findings suggest that the credit card ban has positively impacted some, prompting debt repayment, allowing the chance to stop building debt, building awareness of gambling risks and reducing temptation for those recovering from gambling-related harms. However, findings also suggest that the ban had little impact or a potentially negative impact on others (e.g., pushing some towards riskier and less traceable borrowing methods).

Impact on gambling-related harms

↗ Financial harms

Of those who had ever gambled in the past and were aware of the ban, only a small proportion (9%) said they were more likely to borrow more money than they could easily pay back following the ban. Table 1 breaks down reported likelihood to borrow more money than could easily pay back by PGSI category.

	More likely to borrow	No change	Less likely to borrow	Don't know/prefer not to say
All respondents*	9%	60%	21%	9%
Stratification by PGSI category				
Moderate or high levels of problems from gambling	23%	41%	30%	6%
Low levels of problems from gambling	3%	67%	22%	8%
No reported problems from gambling	2%	72%	17%	9%
People who do not gamble	8%	54%	16%	22%

Table 1: Proportion of respondents more or less likely to borrow more money than they can easily pay back.

* Proportions do not add to 100% due to rounding.

Different reasons for changes to borrowing behaviour were identified in interviews. Some respondents described taking steps to reduce debt through self-monitoring of expenses and

goal setting. Others who may have already had previous or current negative experiences with debt noted that the ban did not impact their ability to manage current debt.

Gambling treatment/support providers and affected others raised concerns that those who gamble may find ways around the ban, which could make it more challenging for affected others to monitor spending of those who gamble. A preference for borrowing from less-risky sources was expressed by people who gamble through interviews, though some indicated that their desire to gamble was stronger than their ability to stop gambling with borrowed money. Some also expressed a belief that the borrowed money would be won back.

Survey data suggests that 19% of respondents who had ever gambled in the past reported they were more likely to do something illegal (e.g., taking money without asking, using someone else's account, use of loan sharks) to pay for gambling or gambling debt post-ban, while 24% said they were less likely to, and 47% that the ban had not changed whether they would do so.

Organisational stakeholders felt that people were more likely to turn to other available forms of borrowed money before considering illegal or fraudulent activities to fund gambling. It is also unclear whether people who gamble moved to unlicensed or black-market gambling operators as stakeholder interviews revealed that there is no easy way to track migration to black marketing gambling operators.

Impact on other gambling-related harms

Interviews with people who gamble and affected others identified some positive ways the ban impacted wider gambling harms, beyond finances. These include a prompting to reduce gambling overall, finding an ability to focus on reducing debt, and having the chance

to repair relationships. Even though some who gamble had reduced or stopped gambling post-ban, some legacy gambling harms were still experienced (e.g., concern about financial status, poor physical health), indicating an ongoing need for support.

Safer gambling tools

There was not a significant increase in the likelihood of all respondents being aware of safer gambling tools post-ban. In an adjusted analysis, stratified by PCSI category, only those experiencing a low level of problems from gambling were more likely to say they were aware of or had used any safer gambling tools post-ban.

In interviews, people who gamble and affected others had a widespread awareness of safer gambling tools, though there were no links made between the credit card ban and this awareness.

While gambling operators broadly accepted the credit card ban as a positive safer gambling intervention, many were reluctant to attribute changes in behaviours or increases in use of safer gambling tools to the credit card ban, as they were concurrently upgrading other safer gambling tools and systems.

Interaction with the COVID-19 pandemic

The credit card ban was implemented in April 2020, at the start of the COVID-19 pandemic during lockdowns in Great Britain, including closures of in-person gambling sites.

Implementation

During the implementation period, staff working for gambling operators had to adapt to remote work while also implementing the ban. This led to some additional technical challenges and strained timelines.

↗ Interaction with gambling behaviours

People experiencing moderate or high levels of problems from gambling were the most likely to say that they had gambled more often during the pandemic compared to before the pandemic, with 38% saying they gambled more often. Other demographic groups that had significant proportions reporting they gambled more often after the onset of the pandemic include the 18–34-year-old age group (19%), and people from an ethnic minority background (19%).

Of those who said they had gambled more often during the pandemic, the most commonly reported reason was having more spare time. Other reasons reported included managing mood because of being in a pandemic, the accessibility of online gambling and gambling to increase income or to meet financial needs. These reasons for increased gambling were also reflected in interviews with people who gamble.

Among all those who continued to gamble after the ban, a small proportion (4%) reported that the pandemic itself had impacted their likelihood to borrow money for gambling. This proportion was higher (22%) among people experiencing moderate or high levels of problems from gambling. Interviews supported this trend, revealing that those who gambled at high levels with larger debts often reacted to a loss of income during lockdown by increasing gambling with borrowed money.

It was highlighted in interviews with gambling treatment/support providers that the pandemic presents a confounding barrier to understanding the effectiveness of the ban. One gambling treatment/support providing organisation noted that they had an initial decrease in support seeking at the start of the pandemic, but many organisational stakeholders noted that online problem gambling increased during the pandemic.

What do organisational stakeholders, people who gamble, and affected others recommend?

During the interviews, organisational stakeholders, people who gamble, and affected others made the following recommendations to improve the implementation of the credit card ban and identified areas of consideration for future policies.

Implementation of future policies

The evaluation findings suggest that the gambling operators and financial operators were able to implement the ban as intended. In interviews with these groups, several recommendations for the implementation of future policies were identified.

→ Improved coordination and collaboration.

Direct involvement of the Gambling Commission and financial authorities in coordination of implementation of the ban could have helped with implementation.

→ **Policy implementation guidance produced through stakeholder engagement.**

More collaborative discussions between the Gambling Commission and operators about the complexities of implementing a new policy could result in more pragmatic guidance on how to implement a new policy.

→ **Longer implementation periods.**

Longer implementation periods would support the required allocation of resources without impacting other tasks and the customer experience.

→ **Broader dissemination of information about the ban.**

A wide variety of advertising channels should be used prior to implementation to reach as many individuals impacted by the policy change as possible.

Considerations for future policies

→ **Bans on other forms of borrowing to gamble.**

To protect people who gamble and add additional friction to the process of gambling with borrowed money, a progressive banning of most forms of money borrowing for gambling could be implemented.

→ **Additional measures to address gambling behaviours and gambling-related harms alongside a credit card ban.**

Some suggested additional measures included: more affordability checks, personalised messages about local support services, regulations to implement maximum wait times for operators to provide requested supports to stop gambling, a system of larger overdraft limits that can only be unlocked when previous debts are paid, and a centralised system for gambling payments to limit bypassing of controls. Campaigns to address mental health and showing the risks and harms associated with gambling may also be beneficial.

The gambling landscape has evolved since this evaluation's data collection. Some jurisdictions are now implementing or considering credit card bans for gambling. The Gambling Act Review White Paper identified priorities aligned with concerns raised by evaluation participants, including financial vulnerability checks and increased protection for individuals vulnerable to gambling harms.

→ **Focus interventions on those at most risk.**

The current credit card ban policy and design of future policies could be strengthened by focusing on reducing gambling-related harms in those most at risk. Operators, banks, and payday loan companies could work together to target those most at risk, for example by introducing more checks on how money used for gambling was sourced.

What are the key takeaways of this evaluation?

Implementation

- The credit card ban was successfully implemented in April 2020. Communications about the ban did not reach all people who gamble. People who are experiencing moderate and high levels of problems from gambling were the most likely to be aware of the ban's implementation.
 - Overall, the ban was perceived to be a positive change by people who gamble, affected others, and gambling treatment/support providers.
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Impact on gambling patterns and behaviour

- The increased friction imposed by the credit card ban did not always result in changed patterns of gambling.
 - Controlling for sociodemographic factors, people experiencing no reported problems from gambling, and people experiencing low levels of problems from gambling were more likely to report reduced use of credit cards to gamble and use of borrowed money to gamble post-ban. By-passing of the ban was achieved through indirect use of credit cards.
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Impact on gambling-related harms and use of safer gambling tools

- Most people who gamble reported that their borrowing behaviour did not change post-ban, and nearly all continue to avoid illegal forms of borrowing.
 - There was no change in the likelihood of being aware of safer gambling tools.
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Influence of the COVID-19 pandemic

- The impact of the COVID-19 pandemic added challenges to implementation, making it difficult to distinguish the impact of the ban from the impacts of the pandemic.
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What do the evaluators recommend?

Recommendations for future evaluations and research that were highlighted include:

- **Focusing on those who have started gambling after the implementation of the ban.** The longer-term impact of the ban could be assessed by tracking long-term gambling patterns, related to new debt creation and borrowing-related gambling harms. If these harms remain high, it could indicate the need for further interventions to address these behaviours.
- **Focusing on those at highest risk of gambling harms.** Findings from this evaluation suggest that the credit card ban does not do enough to prevent gambling with borrowed money for people who experience problems with gambling. Ongoing monitoring of those with the highest risk of harms and their use of credit, could help understand the effectiveness of future policy initiatives, as well as untangling the impacts of the COVID-19 lockdown.
- **Investigating the extent of gambling on overseas websites.** Some countries have considered or have prohibited gambling on websites licensed overseas. There is some evidence that these overseas websites could be a way to circumvent the credit card ban, though more research is needed in this area.
- **Exploring the role of smartphones in gambling harms.** Interviews suggested that the gambling industry has not kept up with impacts of the constant accessibility of gambling apps. Solutions could potentially be identified through further research into the impacts of smartphone use on those experiencing gambling harms.
- **Using operational data from gambling and financial operators to enhance evaluation.** Where feasible, these data could enhance evaluation through data that reveals real-time changes in gambling behaviours and activities.
- **Adopting theoretical models and frameworks for evaluation.** Theoretical tools can help provide a more nuanced understanding of the impact of interventions on behaviour changes.

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About Evaluation Snapshots

Evaluation snapshots developed by Greo Evidence Insights are plain language summaries of evaluations conducted on gambling-related programmes, policies, and practices. Evaluation snapshots feature key information about evaluations including the purpose, methods, findings, and recommendations. These snapshots are intended to make evaluation findings more accessible for stakeholders, who can then use these findings to inform their safer gambling strategies.

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