

Evaluation of the Credit Card Ban for Gambling in Great Britain

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Executive Summary

The National Centre for Social Research (NatCen) was commissioned by Greo Evidence Insights (Greo) to undertake an evaluation of the credit card ban for gambling in Great Britain. The ban came into effect in Great Britain on 14 April 2020. It prohibited licensed gambling operators from accepting payment for gambling by credit card, including payments by credit card made to the operator through a money service business.

This report summarises the findings and analysis from the evaluation between May 2021 and February 2023.

Aim and objectives

The aim of this evaluation was to assess the impact and effectiveness of the credit card ban. The specific objectives of the evaluation were to:

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

Methodology

The report draws on the evaluation framework that was developed in line with a Theory of Change (ToC) setting out the outcomes and assumptions surrounding the ban. This is a mixed-method evaluation, consisting of three workstreams:

1. **Scoping:** Development of an evaluation plan and research tools.
2. **Quantitative:** Repeated cross-sectional secondary analysis of existing quarterly Online Tracker Survey trend data¹ related to people's gambling behaviour (e.g., online and in-person gambling, use of different forms of borrowed money for gambling), pre- and post-ban. Preliminary analyses were conducted on two waves (one pre- and one post-ban). Main analyses were conducted on data from seven waves (five pre-ban and two post-ban). Weighted descriptive analysis of a new module of survey questions in the Online Tracker Survey, asked post-ban (i.e., asking retrospectively about the ban and about gambling and gambling behaviours during the COVID-19 pandemic).

¹ The survey was delivered by Yonder for the Gambling Commission and was drawn from a nationally representative sample of up to 2,000 adults per wave, aged 18 and over in Great Britain.

3. **Qualitative:** In-depth interviews with people who had gambled with a credit card (n=20), people affected by someone's credit card gambling (n=7), and organisational stakeholders (i.e., treatment / support providers, gambling operators, and financial operators) (n=7).² All topic guides were informed by the ToC, and all interviews were analysed using an inductive (data-driven) approach. COM-B (Capability, Opportunity, Motivation and Behaviour) model and Theoretical Domains Framework (TDF) were also used to inform the development of the topic guide and the deductive analysis of interview data for the interviews with people who gamble. A theory-informed approach allows for an in-depth exploration of factors that drives specific gambling behaviours, and possible mechanisms in which the ban has influenced individual behaviours.

Key findings

The key findings are presented below by each evaluation objective (see above). For ease of interpretation, findings around the impact of the ban on those who gamble and affected other are presented together.

Degree to which the ban has been implemented as intended

Facilitators and barriers: Facilitators to the implementation of the ban that were identified by organisational stakeholders from the gambling and financial sectors included: 1) the fact that the ban was mandatory and 2) pre-existing good relationships between gambling operators and financial and payment operators which helped with the practical aspects of implementation (e.g., helping gambling operators to identify which ranges of card numbers related to credit cards and should be blocked, and finding solutions to the potential risk of digital wallets being used to get around the ban). Barriers identified included: 1) logistical barriers; 2) lack of involvement of financial institutions and coordination; 3) unhelpful implementation guidance; and 4) additional technical / implementation challenges caused by the COVID-19 pandemic.

Awareness of the ban: Overall, one quarter of respondents in the Online Tracker Survey (combined September and December 2021 waves) – approximately 18-20 months after the ban's introduction – including people who gamble and people who do not gamble, said they were aware of the credit card ban. People experiencing a moderate or high level of problems from gambling (57%) were more likely to be aware of the ban, compared with people experiencing a low level of problems from gambling (29%), people experiencing no reported problems from gambling (23%), and people who did not gamble (11%). Interview data showed that people found out about the ban through various channels, e.g., emails from gambling operators, pop-up messages on gambling websites, and social media. It was felt by some people that the ban could have been advertised through wider channels in order to reach different population groups (e.g., affected others, older people).

Perception of the ban: The ban was perceived to be a positive change by key stakeholders (people who gamble, affected others, support providers) overall. In the interviews, people who gamble and affected others demonstrated a clear understanding of why the ban was implemented. However, support providers felt that the ban was not comprehensive enough as it did not address other types of borrowed money. Gambling operators felt a risk-based approach would have been preferred as they believed many of their customers were not in financial difficulties from using a credit card. Support providers and affected others raised the concern that

² For brevity in the report, we generally refer to interviews with 'people who gamble'. However, our recruitment criterion was 'people who continued to gamble with a credit card or had gambled with a credit card before the ban, and our sample included some participants who were no longer gambling at all. Equally for brevity, we generally refer to interviews with 'affected others', while our recruitment criterion and sample more specifically included people who had been affected by another person's gambling with a credit card.

people experiencing problems with gambling would turn to other sources of borrowed money which will make it difficult for affected others to monitor the spending of those who gamble.

A summary of evidence on implementation of the ban in relation to the programme's ToC can be found in Table 3.1.

Extent to which credit card users changed their gambling behaviours as a result of the ban

The majority of people who were surveyed about their gambling had not used any borrowed money for gambling in the last 12 months (pre- and post-ban), but among those who did, credit card borrowing was the most commonly reported means.

When looking at the sample as a whole, preliminary analysis indicated that there was not a change in the overall proportion of people using a credit card to gamble post-ban compared with pre-ban. The analysis covering an extended period of time pre- and post- ban waves similarly found no significant difference between those in the post-ban waves and their likelihood of using a credit card, compared with those in the pre-ban waves.

An adjusted model was conducted, controlling for age, gender, ethnicity, marital or relationship status, socioeconomic status, and PGSI score category. In this adjusted model, among all people who gambled, those in the post-ban survey waves had a lower likelihood (AOR 0.82*)³ of reporting that they had used credit cards to gamble compared with those in the pre-ban waves.

In further adjusted models, stratified (grouped) by PGSI score category, there were significant differences in the likelihood of using credit cards to gamble among those in the post-ban waves compared with the pre-ban waves. Specifically, among those experiencing no reported problems from gambling and those experiencing a low level of problems from gambling, those in the post-ban waves were less likely to report using credit cards to gamble with (AOR 0.43*** and 0.29*** respectively), compared with those in the same PGSI categories in the pre-ban waves. By contrast, in the model for those experiencing a high level of problem from gambling, the likelihood of using credit cards to gamble was increased (AOR 1.36*) in the post-ban waves compared with the pre-ban waves.

The findings above should be considered in the context of a higher proportion of survey respondents experiencing a moderate or high level of problems from gambling in the post-ban survey wave samples compared with the pre-ban waves. In the main analysis using a pooled sample of pre- and post-ban survey waves, respondents were more likely to be experiencing a moderate or high level of problems from gambling in the post-ban waves compared with the pre-ban waves, in the adjusted model (AOR 1.31***).

Gambling with a credit card after the ban does not necessarily indicate a breach of the ban by operators: people could use credit cards indirectly in a number of ways (e.g., withdrawing cash with a credit card to pay for gambling) and equally, some forms of direct use of credit cards for gambling were not prohibited, (e.g., purchasing national lottery tickets along with other items).

Analysis of survey respondents' self-reported use of borrowed money to gamble in the previous 12 months suggests that overall, there was no significant effect from the introduction of the ban on the use of borrowed

³ Asterisks (*) following a statistical figure indicate that the finding was statistically significant. Significance is indicated at the 0.05 level (*), the 0.01 level (**) and the 0.001 level (***), denoting respectively a 95%, 99% or 99.9% probability that the finding is not due to chance.

money by people who gambled. By contrast, after adjusting for age, gender, marital or relationship status, socioeconomic status, and PGSI score category, those in the post-ban waves were significantly less likely to have borrowed money in the past 12 months (AOR 0.65^{***}) compared with respondents in the pre-ban waves.

Further exploration using stratified analysis by PGSI score category found that the likelihood of those in the post-ban groups reporting that they had used borrowed money to gamble was lower among those experiencing no reported problems from gambling (AOR 0.35^{***}) and a low level of problems from gambling (AOR 0.38^{***}), compared with those in the same PGSI categories who were in the pre-ban waves. This effect was not seen for those experiencing a moderate or high level of problems from gambling.

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.

Qualitative data showed that the credit card ban provided an opportunity for reflection about some aspects of gambling behaviour. For example, creating a dedicated debit account for gambling and depositing a set amount each month as a way to control the spend, reducing the number of gambling accounts held, or reviewing personal finances and starting to budget for gambling after paying bills.

Among respondents who used credit cards for gambling post-ban, around half (51%) said they had used a credit card indirectly (e.g., making a cash withdrawal or transfer from credit card to a bank account, using credit cards for living expenses to make funds available for gambling, depositing credit card to digital wallet) to pay for gambling. People who reported that they did not use a credit for gambling through indirect methods spoke about the costs of making cash withdrawals from credit cards for gambling as a disincentive, and about the negative connotations that looking for indirect methods had for them with issues such as debt, addiction, and problems with gambling. There was also a lack of awareness of how it would be possible to divert credit card funds to pay for gambling (COM-B: Reflective motivation; TDF: Beliefs about consequences; COM-B: Psychological Capability; TDF: Knowledge). Among people who were using credit cards extensively for gambling and had debts at the time of the ban, there was a very conscious switch from gambling with credit cards to paying for everyday costs on the credit card and continuing to gamble with other sources of money, for example debit cards.

A summary of evidence on impact of the ban on gambling behaviours in relation to the programme's ToC can be found in Table 4.2.

Impact on gambling-related harms experienced by people who gamble with borrowed money and affected others

Among survey respondents who had ever gambled in the past and were aware of the ban, only a small proportion (nine per cent) said they were more likely to borrow more money than they could easily pay back following the ban, while 21% reported being less likely to do so, and the majority (60%) said their borrowing had not changed since the introduction of the ban.

When examined by PGSI category, people experiencing a moderate or high level of problem from gambling were more likely to report changes in their behaviour. Among those experiencing a moderate or high level of problems from gambling, 30% said they were less likely and 23% that they were more likely to borrow more money than they could repay respectively. Although more likely to report no change in this behaviour, there was a similar pattern among people experiencing no reported problems from gambling, of whom 72% reported no

change, 17% said they were less likely to borrow more than they could easily pay back after the ban, and only two per cent that they were more likely to do so.

Qualitative evidence revealed different reasons behind the change in debt incurred following the ban. One key driver was motivation – some had taken steps to reduce their credit card debt through self-monitoring of expenses (COM-B: Psychological capability; TDF: Behavioural regulation) and setting goals (COM-B: Reflective motivation; TDF: Goals). Some people who gambled noted that the ban did not influence their ability to manage or reduce their current debt. This can be explained by their previous negative experience with debt (COM-B: Psychological capability; TDF: Memory, attention and decision processes) or that they were already consulting their family and friends for advice (COM-B: Social opportunity; TDF: Social influences).

One potential unintended consequence identified in the literature is that harms may simply be transferred, such as gambling moving from credit cards to higher risk forms of borrowing. In the interviews with support providers and affected others, there were concerns that people who gamble may find ways around the ban (e.g., black market websites), which could make it more difficult for affected others to monitor the spending of those who gamble. Survey data suggested only two per cent of all those who had gambled reported using payday loans to pay for gambling in the last 12 months post-ban, which indicated a small non-significant reduction in the use of payday loans. Interview data suggested that people who gamble generally preferred borrowing money from less risky sources to pay for gambling due to their awareness of risks and concerns over the lack of regulation when borrowing money from loan sharks (COM-B: Automatic motivation; TDF: Emotion; COM-B: Reflective motivation; TDF: Beliefs about consequences); whereas some said despite the awareness of risks, they would continue using risky forms of borrowing due to their desire to gamble being stronger than their ability to stop gambling with borrowed money (COM-B: Capability; TDF: Cognitive and interpersonal skills; COM-B: Reflective motivation; TDF: Intentions), and some said there was a belief that they would win the money borrowed back (COM-B: Reflective motivation; TDF: Beliefs about consequences).

Descriptive analysis of the post-ban survey data suggests that 19% of all respondents who had gambled in the past reported they were 'more likely' to do something illegal to pay for gambling / gambling debt since the ban, 24% said they were 'less likely' to, and 47% that the ban had 'not changed' whether or not they would do so. Organisational stakeholders felt that people were more likely to turn to other forms of borrowed money available before considering using fraudulent money or criminal activities to fund gambling. It is also unclear whether people who gamble moved to unlicensed or black-market gambling operators; organisational stakeholder interviews revealed that there is no easy way to track migration to black marketing gambling operators.

Beyond the financial harms discussed above, the ban also impacted wider gambling harms mostly in a positive way, e.g., relationships with affected others, health and wellbeing, and work (details can be found in section 5.2). However, despite reducing or stopping gambling following the ban, some experienced legacy gambling harms (refers to adverse consequences that extend past the period where people are actively gambling at harmful levels), e.g., they were still concerned about their financial status and debt repayments and their poor physical health persisted; this indicates the need for ongoing support to not only prevent relapse but also support in other areas such as finance and health and wellbeing.

Although among all respondents who had gambled there was no change following the ban in the likelihood of their being aware of Safer Gambling tools, there was a statistically significant increase in the level of awareness among people experiencing no reported problems from gambling (55% pre-ban vs. 60% post-ban); respondents in this PGSI category were more likely (AOR 1.29**) to say they were aware or had had experience of Safer Gambling tools post-ban than pre-ban. In addition to the use of Safer Gambling tools, some said the ban

encouraged them to seek further support through banks and Citizens Advice who provided them with financial advice and repayment plans and take steps to pay back the credit card debt in regular instalments.

A summary of evidence on gambling-related harms in relation to the programme's ToC can be found in Table 5.1.

How the COVID-19 pandemic interacted with the implementation and outcomes of the ban

The beginning of the COVID-19 pandemic coincided with the implementation of the credit card ban, which resulted in gambling operator staff working from home. Consequently, staff had to adapt to an “untested” way of working while implementing the ban, such as remotely putting “live technical code” on products.

The timing of the implementation of the ban became difficult as many of those working for gambling operators were working from home, and staff were also unwell with COVID-19. As staff were situated at home, this caused concern around their ability to implement the technical changes required for the ban (i.e., access to equipment and coding). The operational and technical capacity to put “live technical code” on products in a remote setting was “untested”. Adapting to a new way of working while trying to implement the ban put a further strain on the timeline.

The ban on the use of credit cards for gambling was introduced in Great Britain on 14 April 2020, three weeks after the announcement of a national lockdown during the COVID-19 pandemic. A number of questions were therefore asked (in the post-ban September and December 2021 survey waves) to understand changes to gambling during the COVID-19 pandemic and how this may have interacted with the credit card ban. In the combined descriptive analysis of these two waves, overall, 62% of those who had gambled in the past and had not stopped gambling since the ban said the frequency of their gambling was unchanged by comparison with before the pandemic, 21% said they gambled less often, and 10% said they gambled more often during the pandemic than before.

When looking at the picture by gambling severity, nearly two-fifths (38%) of people experiencing a moderate or high level of problems from gambling said they gambled more often during the pandemic compared with before the pandemic. By contrast, 15% of people experiencing a low level of problems from gambling and four per cent of people experiencing no reported problems from gambling said they gambled more often during the pandemic compared with pre-pandemic. Among those who said they had gambled more often during the pandemic, 56% stated that having more spare time was one reason for them gambling more. Other commonly reported reasons include: to manage their mood as a result of being in a pandemic (31%), more online gambling making it easier to gamble (23%), and gambling to increase their disposable income or to meet financial needs (22%).

Conclusions

While other countries have adopted similar policies to ban the use of credit card for gambling to various degree, evidence on its impact and effectiveness is limited. To our knowledge, this is the first evaluation examining the impact and effectiveness of this policy (at the time that this evaluation was conducted). There were several challenges associated with this evaluation as stated in the report, one of which was the impact of COVID-19. To examine the influence of COVID-19 on the ban, efforts were made to gather evidence to clearly articulate external factors (such as the COVID-19 pandemic) and how they interacted with / influenced the implementation and outcomes of the ban, which is outside of the direct control of the intervention. Additional waves of data need to be analysed to monitor the progress of the ban further into the future.

The ban was broadly perceived by people who gamble, affected others, and organisational stakeholders as a step change in reduction of harm from credit-based gambling. Our evidence indicated that the ban was effective in creating some 'friction' and may be more effective among those with low gambling problems, as opposed to those with moderate / high gambling problems. It also appears to support the assumption that those experiencing lower or moderate levels of harm may be encouraged (caused by the friction of the ban) to reflect on their gambling expenditure before seeking other forms of borrowed money for gambling; and that the ban may have little or no effect on those who experience high gambling problems who tend to use a range of additional sources of money. Therefore, the banning of other forms of borrowing to gamble may further increase this 'friction' which in turn further helps reduce credit-related gambling harms. It has also been recognised that a broader system-wide approach and multi-sectoral efforts were vital to tackle different levels of gambling and gambling related harms.

Lastly, the use of COM-B model and TDF has helped shed further insight and unpick the complexity as to why the credit card ban may or may not have made a difference in people's gambling behaviours (i.e., motivations to access other (risky) forms of borrowed money for gambling following the ban), and a similar approach can be applied in future evaluations of gambling policies / interventions.

A list of recommendations emerged from the evaluation findings. These can be found in section 6.3.

Glossary and abbreviations

0.1 Abbreviations

AOR	Adjusted Odds Ratio
BIN	Bank Identification Number
COM-B	Capability, Opportunity, Motivation and Behaviour model
GC	Gambling Commission
GGY	Gross Gambling Yield
Geo	Geo Evidence Insights
GRH	Gambling-related Harms
PGSI	Problem Gambling Severity Index
RER	Rapid Evidence Review
TDF	Theoretical Domains Framework
ToC	Theory of Change

0.2 Glossary

Table 0.1 below describes some of the key terms used throughout this report:

Table 0.1 Definitions used in this report

Term	Definition
Adjusted odds ratio	In logistic regression models, how many times more or less likely someone with a specific explanatory characteristic is to experience the outcome variable, after adjusting for additional predictor variables such as age, ethnicity, or gender.
Affected others	People affected by someone else's credit card gambling, e.g., relative, partner, children, parent, friend.
Bank Identification Number (BIN)	The first four to six digits of a credit card that identify the company (bank or another financial organisation) that has issued the card.
Binary logistic regression	Statistical method which uses observations in the data to predict a binary outcome (such as whether or not someone used a credit card to gamble in the last 12 months). Unlike descriptive analysis, it can estimate the relationship between explanatory and outcome variables while controlling for other factors that may also impact this relationship.

Black market sources	Sources such as online gambling sites which are not licensed to provide online gambling facilities in Britain.
Causal mechanism	The pathway or process by which an effect or outcome is accomplished.
Control variable/predictor variable	Other variables that may influence the relationship between the outcome and explanatory variables, but they are not a key variable of interest. Including these in a logistic regression allows us to estimate the 'adjusted' relationship between explanatory and outcome variables.
Credit card ban	Ban on online and offline gambling products with the exception of non-remote lotteries. The ban was introduced in April 2020 by the Gambling Commission as another layer of protection to vulnerable people and to add friction to the process of gambling with borrowed money.
Descriptive analysis	Producing statistics that summarise and describe features of a dataset such as the mean, range, and distribution of values for variables.
Digital wallet	A digital wallet (or e-wallet) is an online service or software program used to make transactions electronically or to store payment information, electronic tickets, and documents.
Explanatory variable(s)	Also known as the independent variable(s). These are variables we include in regression models to explain or predict changes in the outcome variable. For example, age, disability status and education level.
Gambling	Any kind of betting, gaming, or playing lotteries. Gaming means taking part in games of chance for a prize, betting involves making a bet on the outcome of sports, races, events or whether or not something is true, and lotteries involve a payment to participate in an event in which prizes are allocated on the basis of chance (such as raffles and sweepstakes).
Gambling-related harms	The adverse impacts from gambling on the health and wellbeing of individuals, families, communities, and society. It includes, but is not limited to, financial consequences, relationship disruption, conflict or breakdown, mental and physical adverse health, reduced performance at work or in education, and criminal activity.
Gross Gambling Yield	The amount retained by gambling operators after the payment of winnings prior to operating cost deductions. It represents the difference between the amount wagered minus the amount won.
Increased frictions brought about by credit card ban	Removing their ability to use credit cards may help to introduce a 'pause' in the gambling experience.
Odds ratio	These are a key output from logistic regression models. Odds ratios reflect how many times more or less likely someone with a specific explanatory characteristic is to experience the outcome variable. See also adjusted odds ratio.
Organisational stakeholders	Treatment and support providers, gambling operators, and financial operators (including e-money organisations).

Outcome variable	Also known as the dependent variable. Regression models estimate the relationship between a single outcome variable of interest and the explanatory variables. For example, we can use loneliness as an outcome variable to understand to what extent loneliness is explained by factors like income and gender.
p-value	Used as a measure of statistical significance. Low p-values indicate results are very unlikely to have occurred by random chance. $p < 0.05$ is a commonly cited value, indicating a less than 5 per cent chance that results obtained were by chance. Research findings can be accepted with greater confidence when even lower p-values are cited, for example $p < 0.01$ or $p < 0.001$.
PGSI	<p>The Problem Gambling Severity Index (PGSI) is a standardised measure for the severity of gambling problems in the general population, which provides scores from 0-27. It is a tool based on research on the common signs and consequences of problematic gambling. These are referred to as PGSI categories throughout this report.</p> <p>Throughout the report, we have referred to the PGSI categories as follow:</p> <p>PGSI score of 0: Those experiencing no reported problems with their gambling (<i>often referred to in wider literature as 'non-problem gamblers'</i>).</p> <p>PGSI score of 1-2: Those experiencing a low level of problems with their gambling (<i>often described in wider literature as being at 'low risk' of negative consequences and loss of control</i>).</p> <p>PGSI of 3-7: Those experiencing a moderate level of problems with their gambling (<i>often described in wider literature as being at 'moderate risk' of negative consequences and loss of control</i>).</p> <p>PGSI of 8+: Those experiencing a high level of problems from gambling or 'problem gambling' (<i>defined in the PGSI as being gambling which leads to negative consequences and a possible loss of control</i>).</p> <p>PGSI of 3+: People experiencing a moderate or high level of problems from gambling.</p>
Safer gambling measures	Measures by the gambling industry to limit the risk of problem gambling and gambling-related harm. These aim to protect the young and vulnerable from the adverse consequences of gambling, while empowering customers to manage their gambling.
Safer gambling tools	Tools used by gambling businesses to encourage responsible play, and to help customers control or limit their gambling. Examples include warnings on gambling machines or sites to let players know how much time and money they have spent so far, as well as the option to set a limit for themselves, to block gambling payments or to limit gambling advertisement. Self-exclusion is also a safer gambling tool.
Self-exclusion	Formal process to voluntarily be excluded from online or in person gambling premises for a predetermined period of time. Tool provided by gambling providers to support those who wish to stop gambling or mediate gambling harms.

Statistical significance	A way to quantify whether results from analysis are likely to be due to random chance. A statistically significant result or difference at the 95% level means we can be 95% confident that this was caused by something other than chance alone. All findings presented here are statistically significant unless otherwise stated.
Theory of Change (ToC)	A description and illustration of how and why a desired change is expected to happen in a particular context. It sets out the planned major and intermediate outcomes and how these relate to one another causally.

Contents

Executive Summary	5
Glossary and abbreviations	12
0.1 Abbreviations	12
0.2 Glossary	12
Contents	16
1. Introduction	19
1.1 Background	19
1.2 Evaluation activities and interim reporting	21
1.3 Aim and objectives of this evaluation	22
1.4 Structure of the report	23
2. Methodological approaches	25
2.1 Overview of evaluation methodology	25
2.2 Research questions	26
2.3 Theory of change and evaluation framework	28
2.4 Quantitative evaluation methods	30
2.5 Limitations of the quantitative data	38
2.6 Qualitative evaluation methods	40
2.7 Limitations of the qualitative methods	45
2.8 Ethical considerations	46
3. Implementation of the ban	48
3.1 Awareness of the ban	49
3.2 Implementation of the ban	53
3.3 Summary of evidence in relation to the Theory of Change	54
4. Impact on gambling patterns and behaviours	56
4.1 Credit card use for gambling after the ban	57
4.2 Changes to gambling behaviour after the ban	66
4.3 Influence of the COVID-19 pandemic on gambling	69
4.4 Theory of change and chapter findings	73
5. Impact on gambling-related harms	77
5.1 Financial related harms	78

5.2 Impact on wider gambling-related harms	91
5.3 Awareness and use of safer gambling tools	94
5.4 Theory of change and chapter findings	98
6. Discussion and conclusions	102
6.1 Summary of findings	102
6.2 Strengths and limitations	107
6.3 Recommendations	110
6.4 Conclusions	Error! Bookmark not defined.
Appendix A Methodology	114
Appendix B Survey questionnaire	132
Appendix C Topic Guides	143
Appendix D Information sheets	148
Appendix E Aftercare leaflet	154

Tables

Table 0.1 Definitions used in this report	12
Table 2.1 Research questions	27
Table 2.2 Survey data included in the repeated-cross sectional analysis	31
Table 2.3 Borrowed money use to fund gambling	31
Table 2.4 Problem Gambling Severity Index items	32
Table 2.5 Correlation among PGSI items and with borrowing money to gamble	33
Table 2.6 Summary of key measures included in the analysis	34
Table 2.7 Additional predictor variables	36
Table 2.8 Summary of regression models	37
Table 2.9 Number of interview participants	40
Table 2.10 TDF domains and comparison with COM-B model (brief)	43
Table 2.11 Summary of the themes to be explored in the qualitative interviews	44
Table 3.1 Summary of evidence in relation to the Theory of Change	55
Table 4.1 Summary of regression models presented in chapter 4	58
Table 4.2 Summary of evidence in relation to the ToC	74
Table 5.1 Summary of evidence in relation to the ToC	99
Appendix Table A.1 Evaluation Framework Outline	115
Appendix Table A.2 Weighted descriptives for control variables from all waves (all survey respondents) – percentage (%)	118
Appendix Table A.3 TDF domains and comparison with COM-B model	120
Appendix Table A.4 Sampling criteria for interviews with people who gamble	121
Appendix Table A.5 Achieved sampling characteristics of people who gamble	122

Appendix Table A.6 Sampling criteria for interviews with affected others	122
Appendix Table A.7 Achieved sampling characteristics of people affected by others' gambling	123
Appendix Table A.8 Logistic regression models predicting use of a credit card to gamble in the last 12 months (among all those who had gambled in the last 12 months)	124
Appendix Table A.9 Logistic regression model predicting use of borrowed money to gamble in the last 12 months (among all those who had gambled in the last 12 months)	126
Appendix Table A.10 Logistic regression model predicting use or awareness of a safer gambling tools in the last 12 months (among all those who had gambled in the last 12 months)	128
Appendix Table A.11 Logistic regression model predicting use payday loans to pay for gambling in the last 12 months (among all those who had gambled in the last 12 months)	130
Appendix Table A.12 Logistic regression model predicting problem gambling status in the last 12 months (all respondents)	131

Figures

Figure 2.1 Evaluation activities	25
Figure 2.2 Theory of Change	29
Figure 4.1 How credit cards were used to pay for gambling after the credit card ban	65
Figure 4.2 Changes to how often people have gambled during the COVID-19 pandemic	70
Figure 5.1 Proportion of respondents more or less likely to borrow more money than they could easily pay back since the ban	79
Figure 5.2 Proportion of respondents more or less likely to borrow more money than they could easily pay back since the ban, across PGSI categories	80
Figure 5.3 Proportion of people who gamble more or less likely to borrow money for gambling since the ban	84
Figure 5.4 Proportion of people who gamble who were more or less likely to do something illegal to pay for gambling since the ban	90
Figure 5.5 Proportion of people who were aware of or had used any safer gambling tools	95

1. Introduction

The National Centre for Social Research was commissioned by Greo Evidence Insights to undertake an evaluation of the ban on use of credit cards for gambling in Great Britain. The purpose of this evaluation was to assess the impact and effectiveness of the ban. This report presents the findings of the evaluation of the ban that came into effect on 14 April 2020.

1.1 Background

The gambling industry in Great Britain had a Gross Gambling Yield (GGY) of £14.2bn during the period April 2019–March 2020; and remote (online) gambling represented 39.9% of the gambling market with £5.7bn GGY.⁴ During the period April 2020–March 2021, total GGY for the remote betting, bingo, and casino sector was £6.9bn. It is important to note that the COVID-19 pandemic and its various lockdown restrictions during this period significantly impacted the gambling industry, particularly land-based sectors as well as live sporting events (remote sector); estimates from late returns were also not included. Therefore, this may result in some figures which underestimate the actual totals.⁵ During the period April 2021–March 2022, total GGY of the Great Britain gambling industry was £14.1bn, while remote gambling represented around 45% of the gambling market with £6.4bn GGY.⁶

Analysis for GambleAware of July 2018–June 2019 data from a sample of 139,152 gambling accounts from seven gambling operators indicated that 5.7% of the overall deposits into online accounts were made by credit card; in 8.7% of accounts, a deposit was made by credit card at least once in the year, and in 5.9% of accounts more than one credit card deposit was made in the year.⁷ In the same study, people who gamble with big wins and people who gamble with the highest losses were the groups most likely to use a credit card (in terms of losses, 23.2% of individuals who had losses of more than £2,000 over the year used a credit card with their accounts, while 26.2% of those with gambling accounts with losses of more than £5,000 over the year had used a credit card). Among account holders who received a ‘social responsibility contact’ from an operator, 19.8% had used a credit card more than once and they were more than three times as likely to have been contacted than those who did not use credit cards. Lastly, people who gamble who made use of one of the safer gambling tools,

⁴ Gambling Commission (2020). Industry Statistics - November 2020. Gambling Commission. 26 November 2020. Available at: <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/industry-statistics-november-2020>. [Accessed 7 December 2023]

⁵ Gambling Commission (2021). Industry Statistics - November 2021. Gambling Commission. 25 November 2021. Available at: <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/industry-statistics-november-2021> [Accessed 16 January 2023]

⁶ Gambling Commission (2022). Industry Statistics – November 2022. Gambling Commission. 24 November 2022. Available at: <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/industry-statistics-november-2022> [Accessed 16 January 2023]

⁷ Forrest, D., McHale, I., Dinos, S., Toomse-Smith, M. (2021). Exploring Online Patterns of Play: Interim Report. NatCen Social Research and University of Liverpool commissioned by GambleAware. 9 March 2021. Available at: https://www.begambleaware.org/sites/default/files/2021-03/PoP_Interim%20Report_Short_Final_0.pdf. [Accessed 12 April 2021]

placing limits on their deposits, were more likely to use a credit card (12.0% made a credit card deposit during the year, 7.8% more than once).⁸

In line with the evidence from the above study, Greo Evidence Insights' (Greo) review of the evidence on remote gambling in the UK and of the literature on gambling with credit cards found that five per cent of deposits to accounts were with a credit card; 19% of all interactions from gambling operators relating to responsible or safer gambling were with people who had made a credit card deposit to their account in that month, suggesting greater harm among those people who gamble; and 22% of consumers who used credit cards for gambling were people experiencing problems with gambling and this was a higher proportion than among all people who gamble online (11.6%).⁹

Individuals with a current gambling problem were already using a range of sources to borrow for gambling before the ban: authorised overdrafts, payday loans, unauthorised overdrafts, loan sharks, and using credit in someone else's name.¹⁰

As discussed above, credit cards provide a convenient means of borrowing money to fund gambling and can facilitate high levels of debt as a result of gambling. Following a public consultation in 2019, the Gambling Commission implemented the ban on gambling businesses allowing the use of credit cards for gambling from April 2020. The ban, which covers both online and offline gambling products (apart from non-remote lotteries), was designed to build on and extend several prohibitions and restrictions which were already in place in Great Britain. Examples included established bans on the use of credit cards (prior to the ban) for some forms of gambling such as gaming in casinos, bingo halls and arcades, and in particular types of gambling premises).¹¹ The Gambling Commission's Licence Conditions and Codes of Practice (LCCP) make it clear that the change was implemented as a ban on licensed gambling operators from accepting credit cards as payment for gambling, rather than directly banning consumers from seeking to use credit cards to fund gambling: "*Licensees must not accept payment for gambling by credit card. This includes payments to the licensee made by credit card through a money service business.*"¹² Of the 24 million adults in Great Britain who gamble, the Gambling Commission estimated that 10.5 million gamble online, while estimates from UK Finance cited by the Gambling Commission indicated that 800,000 adults used credit cards for gambling before the ban.¹³

The first year of operation of the credit card ban in Great Britain took place during the COVID-19 pandemic. The effects of national lockdowns remain to be fully understood, with some news sources claiming an increase in online gambling,^{14,15} while the Gambling Commission suggested that although there were changes between

⁸ Forrest, D., McHale, I., Dinos, S., Toomse-Smith, M. (2021). Exploring Online Patterns of Play: Interim Report. NatCen Social Research and University of Liverpool commissioned by GambleAware. 9 March 2021. Available at: https://www.begambleaware.org/sites/default/files/2021-03/PoP_Interim%20Report_Short_Final_0.pdf. [Accessed 12 April 2021]

⁹ Sztainert, T., Baxter, D., McKnight, S., & Voll, J. (2020). The Role of Credit Cards in Gambling: Rapid Evidence Review. GREO prepared for Gambling Commission. March 2020. Available at: https://www.greo.ca/Modules/EvidenceCentre/files/GREO_04_2020_CreditCardRER.pdf. [Accessed 9 April 2021]

¹⁰ Citizens Advice (2019). Citizens Advice Response to the Gambling Commission's Call for Evidence: Gambling with Credit. Citizens Advice. 20 May 2019. Available at: <https://www.citizensadvice.org.uk/wales/about-us/our-work/policy/policy-research-topics/debt-and-money-policy-research/citizens-advice-response-to-the-gambling-commissions-call-for-evidence-gambling-with-credit/>. [Accessed 6 April 2021]

¹¹ Gambling Commission (2021). Mapping a 'theory of change' for the Gambling Credit Card ban.

¹² Gambling Commission (2023). 6.1.2 - Use of credit cards in Online LCCP. Available at: <https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/condition/6-1-2-use-of-credit-cards>. [Accessed 10 March 2023]

¹³ Gambling Commission (2020). Gambling on credit cards to be banned from April 2020. Gambling Commission. 14 January 2020. Available at: <https://www.gamblingcommission.gov.uk/news/article/gambling-on-credit-cards-to-be-banned-from-april-2020>. [Accessed 7 December 2023]

¹⁴ Online Gambling Market Size Rises Amid COVID-19 Pandemic. The European Business Review. 23 November 2020. Available at: <https://www.europeanbusinessreview.com/online-gambling-market-size-rises-amid-covid-19-pandemic/>. [Accessed 12 April 2021]

¹⁵ The pandemic has triggered a British online gambling crisis. Wired. 4 December 2020. Available at: <https://www.wired.co.uk/article/gambling-uk-online-sites-addiction>. [Accessed 12 April 2021]

gambling activities and products, the majority (73%) had not increased the intensity of their gambling either in time or money spent.¹⁶ The Gambling Commission collected monthly data from gambling operators as evidence about the effects of the pandemic on gambling throughout the period; they cautioned against making comparisons between 2020 and 2021 owing to the different operating conditions in place.¹⁷

International Context

A Rapid Evidence Review (RER) on the role of credit cards in gambling, undertaken by Greo for the Gambling Commission (2020),¹⁸ provided an overview of credit card bans or restrictions either under consideration or in place in the following countries: Australia, Canada, Finland, Japan, Netherlands, New Zealand, South Africa, and the United States. Some of the measures covered province or state level rather than national restrictions. Australia and New Zealand were reported to have the most comprehensive approaches. Several countries prohibited gambling on websites licensed overseas or were considering doing so. This review also highlighted that there was a lack of robust evaluation evidence to demonstrate the effects of the bans, as well as any unintended consequences. The risk of substitution of credit card use with other sources of borrowed money, such as overdrafts, unsecured high-cost loans, or illegal activity to raise funds for gambling was a potential unintended consequence of particular interest.

1.2 Evaluation activities and interim reporting

The National Centre for Social Research (NatCen) was commissioned by Greo to undertake a full evaluation of the impact of the credit card ban, commencing in June 2021 for completion in February 2023. As part of the scoping phase for the evaluation, NatCen developed an evaluation plan and research questions in consultation with the Evaluation Steering Group.¹⁹ Interim findings, based on early results from the quantitative and qualitative data collection conducted for the full evaluation, were presented to both the Steering Group and an Advisory Committee made up of representatives from different sectors (academic, public, health, and regulation) in June 2022.²⁰ Meanwhile, the Gambling Commission commissioned and conducted early evaluation and feedback activities on the implementation of the ban and its impacts on people who gambled.

Gambling Commission's evaluation and monitoring work

The Gambling Commission completed its own interim evaluation and monitoring report in November 2021.²¹ Much of the data was drawn from the Gambling Commission's Online Tracker survey and their Consumer Voice research, with additional evidence drawn from banks and other sources. The report concluded that the ban had been implemented successfully. Credit card transactions on gambling had reportedly reduced to a low level following the ban, while the use of credit cards for gambling through digital wallets was also reported to have been prevented successfully. A small number of credit card payments for gambling via digital wallets did occur

¹⁶ Gambling Commission. (2020). Covid 19 and its impact on gambling – July 2020. 31 July 2020. Available at: <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/covid-19-and-its-impact-on-gambling-july-2020>. [Accessed 8 December 2023]

¹⁷ Gambling Commission (2022). Market overview - operator data to Dec 2021 (published February 2022): An overview of the data provided by gambling operators up to December 2021. (Market impact of Covid 19). 17 February 2022. Available at: <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/market-overview-operator-data-to-dec-2021-published-february-2022>. [Accessed 8 December 2023]

¹⁸ Sztainert, T., Baxter, D., McKnight, S., & Voll, J. (2020). The Role of Credit Cards in Gambling: Rapid Evidence Review. GREO prepared for Gambling Commission. March 2020. Available at: https://www.greo.ca/Modules/EvidenceCentre/files/GREO_04_2020_CreditCardRER.pdf. [Accessed 9 April 2021]

¹⁹ National Centre for Social Research. (2021). Credit Card Ban Evaluation: Scoping Report. December 2021.

²⁰ National Centre for Social Research. (2022). Credit Card Ban Evaluation: Interim Report. June 2022.

²¹ Gambling Commission. (2021). Prohibition of gambling on credit cards. December 2021. Available at: <https://www.gamblingcommission.gov.uk/report/prohibition-of-gambling-on-credit-cards> [Accessed 3 November 2023]

shortly after the ban's introduction, owing to merchant coding errors which were swiftly resolved. Other aspects of interest to the Gambling Commission included:

- People making large credit card deposits to gambling accounts in the run up to the ban;
- Displacement to other high-cost credit sources following the ban, such as pay-day loans;
- Displacement to illegal sources of money such as loan sharks, theft, or fraud; and
- Displacement to unlicensed gambling operators.

The Gambling Commission was satisfied that none of these potential consequences had occurred or increased and that activity remained stable following the ban. However, the impact of the COVID-19 pandemic did mean that overall, gambling activity was reduced in the months immediately following the ban. Survey data and the consumer voice research were explored and the conclusion was drawn that changes to gambling behaviour following the ban were largely to reduce the use of borrowed money for gambling, that there was minimal inconvenience to people who gamble for leisure, and that there was broad support for the introduction of the ban among people who gambled. The interim report confirmed to the Gambling Commission that there was no immediate need to alter the ban as implemented.

1.3 Aim and objectives of this evaluation

Given the relatively high proportion of people experiencing serious problems with gambling among those who were using credit cards before the April 2020 ban, and the lack of empirical evaluation, as noted above, on effectiveness and consequences of such bans that had been implemented in other countries, this evaluation for Greo was welcomed.

The aim of the evaluation was to assess the impact and effectiveness of the credit card ban. There were a number of specific evaluation objectives:

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

1.4 Structure of the report

The structure of the rest of the report is outlined below.

- **Chapter 2** outlines the evaluation's methodology. This includes a Theory of Change (ToC), which was used to develop the evaluation questions, as well as a description of the type of data collected and how this data was analysed.
- **Chapter 3** presents the key findings on the period leading to the implementation of the ban, awareness of the ban, and the impact of COVID-19 on the implementation of the ban.
- **Chapter 4** discusses the impact of the ban on gambling patterns and behaviours, the use of credit cards for gambling after the ban, and the influence of COVID-19 on gambling.
- **Chapter 5** discusses the impact of the ban on gambling-related harms. This includes financial related harms and wider gambling-related harms such as on relationships, wellbeing, and work. It also discusses the awareness and use of Safer Gambling tools.
- **Chapter 6** presents the synthesis of findings from the different workstreams in relation to the ToC and the wider literature. It also discusses the strengths and limitations of the evaluation, and overall recommendations and conclusions.

The methodology chapter is supported by a set of detailed appendices at the end of the main report.

- **Appendix A** provides more detail about the methodology used for the quantitative and qualitative workstreams and presents some tables of results from the quantitative analyses.
- **Appendix B** reproduces the survey questionnaire module developed by NatCen for use in the September 2021 and December 2021 waves of the Gambling Commission's regular Online Tracker Survey.
- **Appendix C** presents the topic guides used in the qualitative interviews.
- **Appendix D and E** present participant materials used during the qualitative workstream (information sheets and aftercare leaflets respectively).

A note on language used in this report

Recent decades have led to increasing awareness that gambling-related harms may be considered to represent a serious public health issue.²² Furthermore, stigmatisation of people who experience problems with gambling occurs widely in society, including in research and policy through the use of language focusing on individual behaviours and through labelling the people who gamble as 'problem' rather than indicating that they experience problems and harms from gambling. In this report, where possible, we have aimed to take a more neutral and

²² Price, A., Hilbrecht, M. & Billi, R. (2021). Charting a path towards a public health approach for gambling harm prevention. *J Public Health (Berl.)* 29, 37–53.

de-stigmatising approach to the way we describe both the people who gamble and the relative levels of risk of harm they face. For example, we refer to ‘people who gamble’ rather than to ‘gamblers’.

However, the report includes survey findings which make use of the Canadian Problem Gambling Severity Index (PGSI), an internationally recognised measure of gambling level in individuals. We decided to use non-stigmatising language²³ while referring to PGSI score where relevant. For example, we refer to: ‘people experiencing a moderate or high level of problem from gambling’ to describe those with problem and moderate PGSI scores (these two categories are merged in our analysis). We also describe those with low or zero PGSI scores as ‘people experiencing a low level of problems from gambling’ and ‘people experiencing no reported problems from gambling’ to; and finally, we refer to ‘people who do not gamble’ rather than ‘non-gamblers’.

The ‘Summary of evidence in relation to the Theory of Change (ToC)’ at the end of each chapter uses language in the ToC for clarity and accuracy. We recognise that this is not without problems as it uses language that might be perceived as stigmatising, which can have further negative impact on people experiencing harms from gambling.

It is also worth noting that non-stigmatising language pertaining to gambling continues to evolve and develop, and the language used reflect guidance at the time of publication, which might change in the future.

²³ Walsh, C., Riley, D., Quinty, D., Levy, J., Lloyd, J. & Dinos, S. (2024). How to reduce the stigma of gambling harms through language – A language guide. GambleAware. Available at: <https://www.gambleaware.org/sites/default/files/2024-05/How%20to%20reduce%20the%20stigma%20of%20gambling%20harms%20through%20language.pdf> (Accessed 28 May 2024)

2. Methodological approaches

In this chapter we outline the process for developing research questions and the evaluation plan with reference to the Theory of Change. We describe the methodological approaches taken for the quantitative and qualitative workstreams. We also note methodological limitations.

2.1 Overview of evaluation methodology

To appropriately address each of the evaluation objectives, we applied a mixed methods approach. Evaluation activities were conducted as three workstreams, as illustrated in Figure 2.1.

Figure 2.1 Evaluation activities

Scoping phase	Quantitative	Qualitative
<ul style="list-style-type: none">• Development of the evaluation plan.• Development of the research materials.	<ul style="list-style-type: none">• Weighted descriptive analysis of a module of survey questions asking retrospectively about the ban.¹⁸• Repeated cross-sectional analysis of survey data about gambling activity (including credit card and other forms of borrowed money use) from pre and post-ban.	<ul style="list-style-type: none">• In-depth interviews with people who gamble.• In-depth interviews with affected others.• Interviews with organisational stakeholders, specifically treatment / support providers and gambling operators.

²⁴ The Online Tracker Survey collects data quarterly from a nationally representative sample. The survey asks people about their online gambling behaviour, although it also covers in person gambling. Core questions cover topics such as general gambling behaviours, total amount of gambling, and higher risk borrowing.

The findings from these workstreams were then triangulated and synthesised to provide a comprehensive process and outcome evaluation together with appropriate recommendations on the implementation of the ban and any future refinements to the ban.

2.2 Research questions

A set of research questions was developed with reference to:

- The evaluation goals in the invitation to tender, set out as the evaluation aim and objectives (section 1.3 above); and
- The Theory of Change (ToC) and its logic model (Section 2.3 below).

The research questions were finalised in consultation with the Evaluation Steering Group and were taken forward as a set of pragmatic and testable questions by which we would evaluate the credit card ban's implementation and achievement of outcomes. We identified five overarching research questions and a number of more detailed sub-questions which can be found in Table 2.1 below, along with the ToC components and evaluation objectives to which they relate.

Table 2.1 Research questions

Research question	Theory of Change component	Evaluation objective
<p>1. Has the ban been implemented as intended?</p> <ul style="list-style-type: none"> – What knowledge gaps are there in how it was implemented? – How has the ban's implementation impacted gambling operators and financial operators? 	<p>ToC output:</p> <ul style="list-style-type: none"> – Credit card gambling ban successfully implemented. 	<ul style="list-style-type: none"> – Determine the degree to which the ban has been implemented as intended.
<p>2. What are the measurable anticipated and unanticipated outcomes as a result of the implementation of the ban?</p> <p>2a) To what extent has the credit card ban changed the behaviours of people who gamble including:</p> <ul style="list-style-type: none"> – A reduction in the use of credit cards to fund gambling; – Changes in the use of other forms of credit to fund gambling; and – Changes in gambling habits such as reducing or stopping gambling, moving to unregulated gambling websites, and use of safer gambling tools? <p>2b) What impact has the credit card ban made on gambling harms, including:</p> <ul style="list-style-type: none"> – Reduced financial harms to people who gamble and affected others? – The relationship (and how this has changed before and after the ban) between the credit card ban outcomes (e.g., reduction in the use of borrowed money, change of gambling habits, use of safer gambling tools) and different levels of gambling harms (e.g., people at different levels of risk)? <p>2c) What other positive and negative outcomes of the ban are there for people who gamble and affected others?</p> <ul style="list-style-type: none"> – Has the ban influenced the development of other safer gambling policies or service offerings? 	<p>ToC outcomes:</p> <ul style="list-style-type: none"> – Increased friction results in a 'pause' in gambling, greater self-reflection, and changed gambling patterns. – Increased friction reduces relapses amongst those recovering from gambling-related harms. – There is a reduction in credit and other forms of borrowed monies used by 'debt-risk gamblers'. – There is a reduction in gambling-related debt resulting in bankruptcy. – There is a reduction in gambling-related credit card fraud. – The ban adds impetus to the practice and perceptions of safer gambling support by operators. – Increased awareness of credit-related gambling harms results in more responsible play and an increased uptake of safer gambling tools / self-exclusion. 	<ul style="list-style-type: none"> – Examine the extent to which credit card users changed their gambling behaviours as a result of the ban. – Understand the impact the ban has had on gambling-related financial harms experienced by people who gamble with borrowed money. – Understand the impact of the ban on affected others and people who gamble who are not currently experiencing harm.
<p>3. What are the evidence gaps in our knowledge / understanding of the anticipated and unanticipated outcomes after the implementation of the ban?</p>	<p>ToC outcomes:</p> <p>As for Research question 2 above.</p>	<p>As for Research question 2 above.</p>
<p>4. What progress and achievements have been made towards the longer-term outcomes of the credit card ban outlined in the ToC?</p>	<p>ToC final goals:</p> <ul style="list-style-type: none"> – A reduction in gambling-related harms resulting from gambling with borrowed money. – A reduction in financial-harm consequences for the gambler and affected others as a result of debt incurrences. – New gamblers benefit from normalised non-credit, 'safer' payment behaviours and industry commitments to safer gambling. 	<p>As for Research question 2 above.</p>
<p>5. How has the COVID-19 pandemic interacted with the implementation and outcomes of the credit card ban:</p> <ul style="list-style-type: none"> – How has COVID-19 impacted on gambling using borrowed money? – Does the evidence, taking COVID-19 into consideration, support / suggest modifications to the design and implementation of the ban? 	<p>The interaction of the COVID-19 pandemic with the impacts of the ban was not explicitly included in the ToC or the logic model.</p>	<ul style="list-style-type: none"> – Examine how the COVID-19 pandemic interacted with the implementation and outcomes of the ban.

2.3 Theory of change and evaluation framework

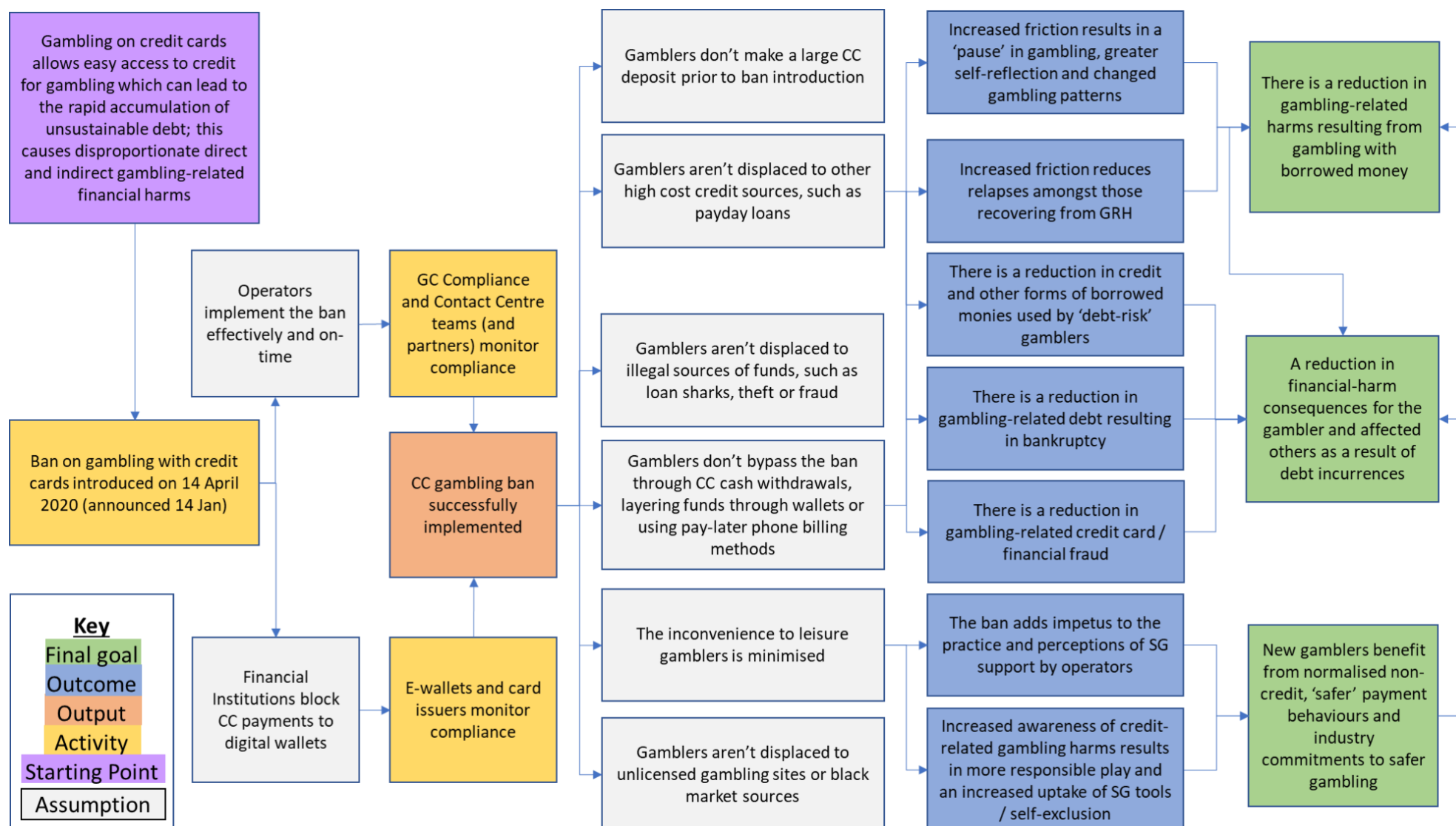
In preparation for the evaluation of the credit card ban and to guide the evaluation research, the Gambling Commission established an Evaluation Steering Group, and arranged for the development of a ToC,²⁵ informed by earlier research and feedback from the national consultation on the introduction of the ban. The ToC was refined in consultation with the Evaluation Steering Group and set out the circumstances surrounding the credit card ban with the aim of helping to “*unpick the cause and effects of the ban*” (see Appendix A for further detail).

Figure 2.2 below summarises the components of the ToC and shows the aspirations for the ban, how it was expected to work, and the explicit and implicit assumptions which underpin the ban. These were especially important to understand given that the potential impacts of the credit card ban may have been affected by external factors related to the COVID-19 pandemic that were not anticipated during the original inception and implementation of the ban.

The credit card ban was aimed at people who gamble who would most benefit from having limited access to alternative sources of credit, and where not pursuing a potential debt-incurring gambling action would be easier for that person who gambles than finding a way to circumvent the lack of immediate credit (introducing ‘friction’). The underlying expectation of the ban was to reduce the risk of gambling harms and gambling-related debt among all people who gamble as well as minimising any negative impact on those not currently experiencing gambling harms (see Appendix A for further detail).

²⁵ Greo Evidence Insights.[n.d.] Mapping a ‘theory of change’ for the Gambling Credit Card ban. Available at: <https://www.greo.ca/en/programs-services/resources/CC-Ban---Theory-of-Change.pdf>. (Accessed 2 November 2023)

Figure 2.2 Theory of Change



An evaluation framework was developed and informed by the ToC components. The evaluation framework outlined the relevant measures for each ToC component as well as the type of research tool used to gather this data to answer the research questions noted in section 2.2 above. See Appendix Table A.1 for the evaluation framework outline.

The following sections summarise the methods used throughout this evaluation, describing the data collection and analysis approaches of the quantitative methods used (section 2.4), and the qualitative methods (section 2.6). Methodological limitations of the quantitative and qualitative approaches are also outlined in this chapter (sections 2.5 and 2.7 respectively).

2.4 Quantitative evaluation methods

The quantitative analysis conducted was structured around three broad areas of the ToC: 1) whether the ban was successfully implemented; 2) unintended effects of the ban; and 3) how far the ban achieved its intended outcomes. Two approaches were adopted to address these areas. **First, repeated cross-sectional data was used to explore how several key outcomes of the ban varied before and after the ban.** These outcomes were: experiencing a moderate or high level of problems from gambling according to their PGSI score; people's use of safer gambling tools; the use of credit cards to pay for gambling; the use of payday loans to pay for gambling; and the use of borrowed money to gamble with overall. This stage of the analysis explored whether the likelihood of these outcomes significantly differed before and after the ban. **Second, a set of retrospective questions (asked only after the ban) were asked about people's experiences of the ban's introduction.** These have not been used to quantify how far gambling (or other types of behaviour) differ, rather they explore people's perceptions and experiences of the ban's implementation.

Quantitative data collection

The data from both strands of the quantitative analysis was collected on the Online Tracker Survey, a web survey conducted by Yonder for the Gambling Commission. The survey collects cross-sectional data quarterly from a nationally representative sample of up to 2,000 adults per wave, aged 18 and over in Great Britain. Respondents are asked consistent (or nearly consistent) questions at each wave, meaning we could combine waves and compare gambling behaviour pre- and post-ban. Where inconsistencies exist between waves in question wording these are highlighted below in the section on quantitative analysis methods. The focus of the survey is to ask people about their online gambling behaviour, although it also covers in person gambling in some areas. In each of the four quarterly waves, core questions are asked covering topics such as general gambling behaviours, total amount of gambling and higher risk borrowing, as well as a measure of gambling severity using the Problem Gambling Severity Index (PGSI) score.

The repeated cross-sectional analysis

As shown in Table 2.2, the data for the repeated cross-sectional analysis was collected in seven waves of the Online Tracker Survey, five pre-ban and two post-ban, spanning December 2018 through to June 2021. The data from the June, September, and December surveys in 2020 were excluded because the question wording for the outcomes referred to the past 12 months, which means that in these waves the respondents' answers would relate to a 12-month period which covered both before and after the ban's introduction. For example, a person who had gambled with borrowed money in the last 12 months in June 2020 would be thinking of a period which fell mostly before the ban's introduction.

Table 2.2 Survey data included in the repeated-cross sectional analysis

December 2018	March 2019	September 2019	December 2019	March 2020	June 2020	September 2020	December 2020	March 2021	June 2021
✓	✓	✓	✓	✓				✓	✓

Outcome variables

The following five outcome variables linked to the ToC were explored:

1. Having borrowed any money to gamble with in the last 12 months using a credit card (yes / no);
2. Having borrowed any money to gamble with in the last 12 months using a payday loan (yes / no);
3. Having borrowed any money to gamble with in the last 12 months (yes / no);
4. Having been identified as experiencing a moderate or high level of problems from gambling (yes / no); and
5. Whether someone reported they were aware of or had used a safer gambling feature in the last 12 months (yes / no).

The first three variables relate to changes in gambling patterns and behaviours. The operationalisation of each of these outcomes is described in greater detail below.

Borrowed money use

The three outcomes above relating to borrowed money use are derived from the same set of multiple-choice questions. Respondents who had gambled in the last 12 months were asked if they had used any of the options outlined in Table 2.3 below. The outcome variables on credit card use and payday loans included everyone who selected those specific items. The outcome variable on borrowed money use overall included anyone who engaged in any of the types of borrowing described in Table 2.3.

Table 2.3 Borrowed money use to fund gambling

Have you used any of the following forms of borrowed money specifically to fund gambling activity in the last 12 months?

1. Credit card
 2. Overdraft facility
 3. Payday loans
 4. Other loans
 5. Family and friends
 6. None
-

It should be noted that there were some inconsistencies in the wording of this question across different waves. In the survey waves from March and June 2021 the wording about credit card use changed to ask whether someone had used:

- Credit card to directly fund gambling (e.g., depositing funds into an online account using a credit card or using a credit card in a gambling establishment); or
- Credit card to indirectly fund gambling (e.g., using a credit card to withdraw cash from an ATM to pay for gambling).

This was to differentiate between forms of credit card which were allowed under the ban on credit card use for gambling, and those which were blocked by it. However, it may have also affected how many people selected these options owing to the change in wording. There was also an item relating to mobile phone account use, where someone could add the cost of gambling to a mobile phone bill that was to be paid at a later date. This item on mobile phone accounts was introduced part way through the period from which we have used data, and is included in the March 2020, March 2021, and June 2021 waves. People who selected this option were coded as having selected ‘other loans’ and so are included in the group who had borrowed money in the last 12 months to gamble with. Finally, an option for ‘other (please specify)’ was only asked up until December 2019. Again, people who selected this response were coded to ‘other loans’, and so were also included in the group who had borrowed money in the last 12 months to pay for gambling.

Gambling severity

The risk level for each person who gambles was measured using the PGSI. Respondents were asked up to nine questions about a behaviour they had “never”, “sometimes”, “most of the time” or “almost always” experienced over the past 12 months in each wave of the survey (see Table 2.4). Each response was associated with a score where never experiencing a behaviour was scored 0 and almost always experiencing a behaviour was scored 3. Scores for individual questions were combined and fell on a scale from 0 to 27 which would place people who gamble into one of four categories: people experiencing no reported problems from gambling, people experiencing a low level of problems from gambling, and people experiencing a moderate or high level of problems from gambling. People experiencing a moderate level of problem from their gambling are those who have moderate problems with their gambling and experience some harm as a result of it, while people who experience a high level of problem from gambling experience harm as well as a possible loss of control in their gambling activity.

Wherever the PGSI categories are analysed in this report, people experiencing a moderate or high level of problems from gambling have been combined into a single category to ensure there is a large enough sample size to make accurate estimates.

Table 2.4 Problem Gambling Severity Index items

Thinking about the last 12 months...

1. Have you bet more than you could really afford to lose?
2. Have you needed to gamble with larger amounts of money to get the same feeling of excitement?
3. When you gambled, did you go back another day to try to win back the money you lost?
4. Have you borrowed money or sold anything to get money to gamble?
5. Have you felt that you might have a problem with gambling?
6. Has gambling caused you any health problems, including stress or anxiety?
7. Have people criticized your betting or told you that you had a gambling problem, regardless of whether or not you thought it was true?
8. Has your gambling caused any financial problems for you or your household?
9. Have you felt guilty about the way you gamble or what happens when you gamble?

Response options: never, sometimes, most of the time, or almost always.

A potential concern around the use of the PGSI index was that it may, to some extent, be measuring the same concept as the questions about borrowing money to gamble. In particular, the PGSI includes an item explicitly about borrowing money to gamble with – “Have you borrowed money or sold anything to get money to gamble?” There was therefore a concern that this PGSI item might overlap very closely with the survey questions measuring people’s borrowing behaviour in this analysis. To explore this a table of correlations between each PGSI item and the overall use of any borrowed money to gamble was produced (see Table 2.5 below). Numbers closer to one indicate a strong positive correlation and numbers closer to zero indicate a weak or non-existent correlation. A value below 0.29 indicates a weak correlation, below 0.49 a moderate correlation, and 0.5 or above a strong correlation. To develop this correlation analysis, each PGSI indicator was reduced to a binary variable where “No” included those who had never experienced that item in the last 12 months and “Yes” included all those who had done so – either “sometimes”, “most of the time”, or “almost always”.

As might be expected, borrowing money is correlated with all of the PGSI items, but not more so for the question about borrowing money to gamble than with the others. This may be because, although similar, the PGSI item also asks about selling things to gamble, and so is potentially more focussed on the *harm* side of gambling behaviour than the general measure of borrowing. As such we proceeded with the separate analysis of the borrowing outcomes, and have used respondents’ PGSI scores as indicative of the presence of gambling harms. However, it should also be noted that, given the items of the PGSI score are strongly correlated with each other and correlated with borrowed money use for gambling, the use of borrowed money for gambling can also be viewed as an indicator of likely gambling harm. Equivalent tables were produced for credit card use and payday loan use and these showed a similar (although slightly weaker) pattern of correlations with PGSI items.

Table 2.5 Correlation among PGSI items and with borrowing money to gamble

PGSI Items:	Borrowed money	PGSI items (1 – 9)								
		1	2	3	4	5	6	7	8	9
1. Have you ever bet more than you could really afford to lose?	0.47	1.00								
2. Have people criticised your betting or told you that you have a gambling problem?	0.46	0.58	1.00							
3. Have you felt guilty about the way you gamble or what happens when you gamble?	0.39	0.55	0.54	1.00						
4. Have you needed to gamble with larger amounts of money to get the same feeling of excitement?	0.51	0.58	0.58	0.45	1.00					
5. When you gambled, did you go back another day to try to win back the money you lost?	0.46	0.58	0.52	0.49	0.56	1.00				
6. Have you borrowed money or sold anything to get money to gamble?	0.50	0.59	0.61	0.51	0.58	0.56	1.00			
7. Have you felt that you might have a problem with gambling?	0.48	0.57	0.60	0.52	0.62	0.58	0.62	1.00		
8. Has gambling caused you any health problems, including stress or anxiety?	0.53	0.60	0.60	0.52	0.64	0.60	0.65	0.68	1.00	
9. Has your gambling caused any financial problems for you or your household?	0.46	0.58	0.60	0.57	0.51	0.56	0.67	0.60	0.64	1.00

Safer gambling

The safer gambling outcome variable was measured by combining responses to five questions that indicated the use or awareness of safer gambling tools for online gambling, asked as part of a larger set of multi-code questions:

- Exclusion by product;
- Time out;
- Financial limits;
- Reality check; and
- Multi-operator self-exclusion.

These were reduced to a single binary variable, where all respondents who answered that they were aware of or had used at least one of these tools were coded as “yes”. Because these questions were not asked as regularly as the other outcomes, the period covered by this analysis includes fewer waves of data: pre-ban it covers only September 2019, and post-ban it covers March 2021. The answer options to this question also changed slightly from the September 2019 wave, when people were asked simply if they were: 1) not aware of tool; 2) aware of it but had not used it; or 3) had used it. In March 2021 these questions asked respondents to distinguish between whether someone had used it in the last 12 months or more than 12 months ago.

The above methods resulted in the five key outcome variables summarised in Table 2.6, each of which relates to a different element of the ToC. Wherever we refer to these measures later in the report, we are using the definition summarised in Table 2.6.

Table 2.6 Summary of key measures included in the analysis

Measures	Summary
1. Credit card use for gambling	A binary variable indicating whether someone has used a credit card for gambling in the last 12 months (among all people who gamble).
2. Payday loan use for gambling	A binary variable indicating whether someone has used a payday loan to fund gambling in the last 12 months (among all people who gamble).
3. Borrowed money use (overall) for gambling	A binary measure which indicates whether someone has used any form of borrowed money for gambling in the last 12 months (includes measures 1 and 2 – among all people who gamble).
4. Problem gambling severity index (PGSI) category	A binary variable indicating whether someone is 1) experiencing a moderate or high level of problem from gambling; or 2) experiencing a low level of, or no reported problems from gambling (among the whole population).
5. Safer gambling tools – use and awareness	A binary variable indicating whether someone who had gambled in the past 12 months was aware of or had used safer gambling tools (among all people who gamble).

Retrospective (post-ban) survey questions about experiences of the ban

As noted earlier in Section 2.4, in addition to the repeated cross-sectional analyses, an additional module of survey questions about the credit card ban was added to the Online Tracker Survey following the ban, presented to follow the existing module of questions about credit card use. These questions did not have comparable pre-ban data, and asked people to retrospectively assess how the ban had impacted them, both in terms of their

gambling, their use of borrowed money when gambling, and other contextual factors which may have affected them – in particular, the COVID-19 pandemic. The survey module was used to illustrate people's perceptions and attitudes towards the ban, rather than to quantify the extent of changes in behaviour following the ban.

This module of questions was developed in consultation with the Steering Group and aligned with the ToC components to ensure it would inform the key assumptions and outcomes of the ban outlined in the ToC. The additional module was run in two post-ban waves of the survey, September 2021 and December 2021, producing a pooled sample size of around 4,000 people for analysis.

The questions focused on the use of credit cards and other forms of borrowed money before and after the ban, the ban's effects on other aspects of people's gambling behaviour, and the effects of the COVID-19 pandemic on gambling behaviour. These questions were used to take account of areas we could not address with the repeated cross-sectional data, such as the impact of the COVID-19 pandemic. A breakdown of the key characteristics of the sample that completed this survey can be found in Appendix Table A.2.

Quantitative analysis methods

Two stages of analysis were conducted for each of the five primary outcomes identified for the repeated cross-sectional analysis. Descriptive analysis was conducted on the retrospective (post-ban) survey dataset variables about experiences of the ban. The analysis methods are described below.

Repeated cross-sectional data – preliminary analysis

We first compared the survey wave immediately before the ban, March 2020, with the period immediately after the ban, March 2021. This examined whether the prevalence of each outcome was significantly different before the ban compared with after the ban. We used the Wald statistic to assess the significance of the predictor (i.e., to see whether there was a significant difference in the prevalence of the outcome immediately post-ban compared with pre-ban). Cross-sectional survey weights were applied to ensure that results were representative of the wider population.

Repeated cross-sectional data – main analysis

The preliminary analysis described above was conducted to explore the immediate effect of the ban, focusing on the two timepoints closest to each other before and after the introduction of the ban. Following this, we combined the data from all pre-ban and post-ban survey waves (December 2018–March 2020 and March 2021–June 2021), providing a pooled dataset with a larger sample size. We excluded data from June 2020, September 2020, and December 2020, where the 12-month period before the survey overlapped with the introduction of the ban. The larger sample size allowed us to conduct logistic regression models to explore whether any external factors, beside the introduction of the ban, might account for any significant differences in gambling behaviour (i.e., adjusted analysis which we explain below).

Using this pooled dataset, **the preliminary analysis was first re-run** to identify whether there was a statistically significant difference in someone's likelihood of experiencing each outcome pre-ban (in the five waves from December 2018 to March 2020) or post-ban (March or June 2021 waves). Second, a set of 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. This was done by including whether each case was pre- or post-ban as a binary predictor in the logistic regression model.

Once this initial model had been estimated, for each outcome, additional predictor²⁶ or control variables (age, gender, ethnicity, socioeconomic status, and marital / relationship status) were added to the model. This process, also known as ‘adjusting for’ or ‘controlling for’ is followed to see whether the ban significantly predicted the outcome, over and above the variance explained by these additional predictors. That is, if there is a significant relationship between the ban and an outcome, which is no longer significant when the additional predictor variables are added to the model, it can be said that the ban had no significant effect on the outcome over and above that explained by other factors.

Control variables

The additional control variables included in the adjusted models (summarised in Table 2.7) were age, gender, ethnicity, marital status, socio-economic status (SES), and PGSI category. The gender variable was made up of two categories ‘male’ and ‘female’. The age variable was initially collected as continuous data and was grouped into three categories: 18–34, 35–54, 55+. The ethnicity variable was initially captured by White, Black, Asian, Mixed, Chinese, and Other. For the purpose of our analysis, Black, Asian, Mixed, Chinese, and Other were combined into a group labelled ‘ethnic minority’ given the low base sizes of each individual category. Marital status was divided into three categories, one indicating those who were married, in a civil partnership, or co-habiting; another including those who were widowed, separated, or divorced; and the third including respondents who were single. SES was measured following the classification developed by the ONS where each individual is assigned a social grade (AB, C1, C2, DE) based on their occupation, employment status, qualifications, and whether work is full time or part-time. These variables were selected as factors that had previously been shown to be associated with a person’s likelihood of gambling or problem gambling.

In addition, for three of the outcomes (credit card use for gambling, borrowed money use (overall) for gambling, and the awareness and use of safer gambling tools) a control variable for PGSI category was also included. The PGSI category variable provided in the dataset grouped people into those experiencing no reported problems from gambling, those experiencing a low level of problems from gambling, people experiencing a moderate level of problem from gambling and people experiencing a high level of problem from gambling. We combined those experiencing a moderate or high level of problems from gambling into one group owing to relatively small sample sizes.

Control variables were entered into the regression model as dummy coded variables. The variables are summarised in Table 2.7 below. For more details on the distributions of these variables, please see Appendix Table A2.

Table 2.7 Additional predictor variables

Variable	Categories
Gender	Male or female.
Age	18–34, 35–54, or 55+.
Ethnicity	White or ethnic minority.
Marital / relationship Status	<ol style="list-style-type: none"> 1. Single, 2. Married / civil partnership / co-habiting or, 3. Widowed / separated / divorced.

²⁶ Predictor variables may also be known as control variables.

Socioeconomic status	<ol style="list-style-type: none"> 1. AB, 2. C1, 3. C2, 4. DE.
PGSI category	<ol style="list-style-type: none"> 1. A person experiencing no reported problems from gambling, 2. A person experiencing a low level of problems from gambling, 3. A person experiencing from gambling.

Finally, because it could be that the ban had a differential effect on outcomes for individuals with different levels of gambling severity, **stratified logistic regression models** grouped by PGSI categories were conducted separately for: 1) people experiencing no reported problems from gambling; 2) people experiencing a low level of problems from gambling; and 3) people experiencing a moderate or high level of problems from gambling. These models can be used to identify whether these groups had a different experience over the period of the ban's introduction. The models were produced for the three outcomes of most interest: credit card use, overall borrowed money use, and the safer gambling outcome, but not for payday loan use. They were also not produced for PGSI status, as everyone in each stratified model would have the same PGSI category.

The logistic regression model results are presented as odds ratios (OR) where there was only one predictor in the model and adjusted odd ratios (AOR) if the model included multiple predictors. Where a statistically significant result was found, this has been clearly reported. A statistically significant result means that the finding was unlikely to be due to random chance. When a result or difference is statistically significant at the 95% level ($p < 0.05$) this means we can be 95% confident that this was caused by something other than chance alone. The different models conducted are summarised in the table below (Table 2.8).

Table 2.8 Summary of regression models

Outcome	Unadjusted model	Adjusted model*	Stratified models (by PGSI category)***		
			People experiencing no reported problems from gambling	People experiencing low level of problems from gambling	People experiencing moderate or high level of problems from gambling
Use of a credit card to pay for gambling	✓	✓	✓	✓	✓
PGSI category (whether a person is experiencing moderate or high level of problems from gambling)	✓	✓	N/A	N/A	N/A
Use of borrowed money to pay for gambling**	✓	✓	✓	✓	✓
Use of payday loans to pay for gambling	✓	✓	N/A	N/A	N/A
Use or awareness of safer gambling tools	✓	✓	✓	✓	✓
Unweighted base sizes****					
Use of a credit card to pay for gambling	10,854	10,712	7,437	1,688	1,587

<i>PGSI category (whether a person is experiencing moderate or high level of problems from gambling)</i>	16,645	16,371	N/A	N/A	N/A
<i>Use of borrowed money to pay for gambling**</i>	10,854	10,712	7,437	1,688	1,587
<i>Use of payday loans to pay for gambling</i>	10,854	10,712	N/A	N/A	N/A
<i>Use or awareness of safer gambling tools</i>	3,627	3,564	2,076	462	457

* Adjusting for gender, age, marital / relationship status, socioeconomic status and PGSI score category (note – PGSI category is not included as a control in the model where it is an outcome).

** Use of borrowed money is any form of borrowed money to pay for gambling, so inclusive of credit cards and payday loans use.

*** The stratified models no longer include PGSI category as a control variable but are still adjusted for the other covariates.

**** Sample sizes vary between models for a number of reasons. The stratified models are run on only a subset of respondents, e.g. people experiencing a low level of problems from gambling. The adjusted models will also exclude respondents who have missing data on any of the covariates used in the model, slightly reducing the sample size for the adjusted compared to the unadjusted models. Finally, the safer gambling tools outcome has a substantially smaller sample size, because it is run on only one pre-ban and one post-ban wave – September 2019 and March 2021 – because these are the only waves where this measure was consistently collected before and after the ban.

Retrospective (post-ban) survey questions about experiences of the ban – descriptive analysis

Descriptive analyses (frequencies and crosstabulations) were conducted on the relevant variables using the combined weighted dataset of the September 2021 and December 2021 survey waves.

2.5 Limitations of the quantitative data

There are several limitations of the survey data which should be considered throughout:

- The online tracker survey asks respondents to report their own gambling experiences which may be subject to recall error. This is particularly the case for the questions asked pre- and post-ban about the use of different forms of borrowed money, which ask respondents to think about ‘the last 12 months’, and the questions asked in September / December 2021 asking respondents how the introduction of the ban (slightly over a year prior in April 2020) affected them.
- The cross-sectional survey data can only present a snapshot of respondents’ PGSI category at one point in time. It cannot describe changes in respondents’ gambling behaviours (e.g., those who may have experienced a high level of problem from gambling in the past but who were no longer gambling or who would have experienced a low level of problems from gambling at the time of the survey).
- Due to the small sample size, we combined people experiencing a moderate and high level of problems with their gambling into one group. Therefore, we were not able to analyse the data from each group separately and there could be additional differences between those two groups, which this report does not address.
- Small changes have been made to survey questions over time which require different responses from respondents and so data may not be directly comparable.

-
- There is some difficulty in attributing changes in gambling behaviours to the introduction of the credit card given the timing of the COVID-19 pandemic.
 - There is not a counterfactual available, showing what would have happened to gambling behaviour in the absence of the ban's introduction. This is because the policy was introduced nationally at the same point in time, so there is no unaffected group whose outcomes would show what would have happened in the absence of the ban. A cross-national comparison might have been possible, however, comparable data on gambling activity collected over the same period would be needed, using the same questions on gambling activity and administered in a similar way, and this was not available.

This means we cannot demonstrate *causally* that changes are due to the introduction of the ban. However, the repeated cross-sectional data can identify whether there has been a change over the period of the ban's introduction, and we have used logistic regression models to explore how far these changes can be attributed to other factors that may have influenced people's gambling behaviour over the same period. We have then triangulated this with other evidence (both from qualitative interviews and retrospective attitudinal survey data) to assess how far this change can be attributed to the introduction of the ban.

2.6 Qualitative evaluation methods

Through the qualitative workstream we conducted semi-structured individual depth interviews to explore the experiences and perspectives of different groups of participants in relation to credit card use for gambling and the consequences involved. Our aim was to draw a diverse picture directly from those the credit card ban was most likely to impact, including people who had gambled with a credit card, and people who had been affected by someone else's credit card gambling. For brevity in this report we have generally referred to 'people who gamble' and 'affected others' to describe these participants groups.

Before starting our fieldwork with these two groups of participants, we also conducted individual interviews with key organisational stakeholders early on in the evaluation research. The aim of the interviews with organisational stakeholders was to explore their experiences of the implementation of the ban and to inform the development of the research materials for the main series of qualitative interviews.

Sampling and recruitment of interview participants

The three distinct participant groups we interviewed were:

- Organisational stakeholders (gambling operators, financial operators, and providers of treatment and / or support services);
- People who gamble (those who still gambled with a credit card and those who had gambled with a credit card before the ban); and
- Affected others (people affected by someone else's credit card gambling).

Table 2.9 shows the number of interview participants and how they were recruited.

Table 2.9 Number of interview participants

Stakeholder Category	Recruitment method	Number of interviews
Organisational stakeholders	Direct contact via email	7
People who gamble	Direct contact via survey; social media	20
Affected others	Social media	7

Organisational stakeholders

A total of seven interviews were conducted with key organisational stakeholders who were able to observe and share insights about the overall effects of the ban. The organisational stakeholder sample was made up of three treatment / support providers, three gambling operators and one financial operator (see Appendix A for more detail).

The research team also reached out to credit card companies to participate in interviews however we did not receive further responses to our invitations.

People who gamble

Individual depth interviews were conducted with 20 people with lived experience of gambling with a credit card before the ban. Of those, a number of participants (n=3) continued to gamble indirectly with a credit card following the introduction of the ban (e.g., by using their credit card for everyday expenses to use as much as possible of their available money for gambling). Other participants in the sample had stopped gambling with a credit card (n=13), or had stopped gambling altogether (n=4).

Participants were purposively sampled using a set of criteria that allowed us to explore a wide range of perspectives and experiences (see Appendix Table A.4 for full sampling criteria).

These participants were primarily recruited from a sample of individuals who had taken part in the Gambling Commission's Online Tracker survey in September 2021 and December 2021 and had agreed to be re-contacted to participate in an interview. A small number of participants (n=3) were recruited via targeted social media posts.

Within our sample of people who gamble, a range of characteristics were obtained in line with the sampling criteria (see Appendix Table A.5).

Affected others

Seven individuals who had been directly impacted by an individual's gambling with a credit card, such as family and friends of people who gamble, were recruited. The relationships to the person who gambles in the achieved participant sample were: two spouses / partners or former spouses / partners; two children; two siblings; and one friend. Interviewing affected others provided an understanding of the broader impact of the credit card ban (e.g., effects of the ban on gambling harms experienced by affected others). Participants were purposively sampled using agreed sampling criteria (see Appendix Table A.6).

A blended approach was used for recruiting affected others:

- Organisations that provide support to people who experience problems with gambling and affected others were contacted. They were asked to share the details of this evaluation with their members and users;
- Use of a targeted Facebook advertisement aimed at recruiting anyone who had been affected by another person's gambling with a credit card. Those viewing the advertisement were then directed to the 'Taking part' page on the NatCen website; and
- A snowballing approach by asking participants from the people who gamble group and completed the interviews to share information of our study with their family members and friends.

Interview method

The main two groups of participants (people who gamble and affected others) participated according to NatCen's careful and ethical approach to qualitative interviewing. Participants were invited to an interview following an initial screening call to ensure the suitability of their participation, to explain the nature of the research, and to document the initial spread of the sample across key demographics. A staged consent process was used. All participants were first asked for their consent to take part in the research during the screening call. Where possible this was followed by a 'cooling-off' period of several days before the interview to allow people to withdraw if wished. At the beginning of the interview call, participants were reminded that their participation was

voluntary. To reduce the risk of digital exclusion (e.g., not having access to a printer and scanner to print and scan a copy of a consent form), participants were invited to give their verbal consent to take part and to be audio-recorded and their consent was also then audio recorded. Participants were reminded at the start and the end of the interview of their right to withdraw from the study. The interviews were conducted by researchers who had experience of moderating interviews with vulnerable groups and on sensitive subjects. Consent to take part was also sought from organisational stakeholders and they were also provided with sufficient information about the research to make an informed decision about participating.

All interviews were conducted using remote communication technologies such as Microsoft Teams for online meetings or telephone. The interviews lasted around 60 minutes for people who gamble and 45 minutes for affected others and organisational stakeholders. On completion of the interviews with people who gamble and affected others, participants were given a £20 shopping voucher via email and an aftercare leaflet. The aftercare leaflet contained a list of national organisations specialising in providing support to people who experience problems with gambling as well as other associated harms. All interviews were audio-recorded with the consent of the participant to allow for an accurate account of the discussion. The interviews with people who gambled and with people affected by others' gambling were transcribed by an external organisation that provides professional transcription services. Interviews with organisational stakeholders were summarised from the audio recordings by the research team.

Theoretical model: integration of COM-B and TDF models

As part of the evaluation research, we elected to apply a theoretical behaviour change model to the design of the qualitative research materials for interviews with people who gambled (topic guide) and to use the model for deductive analysis of their interview transcripts. We chose to deploy the theoretical domains framework (TDF) in combination with the Capability, Opportunity, Motivation and Behaviour model (COM-B). TDF is derived from 33 theories and 128 psychological constructs, developed to identify determinants of behaviour. The framework includes 15 domains and can be further simplified by combining it with the COM-B model. The COM-B model is a framework for understanding behaviour with three key components: Capability, Opportunity and Motivation. These components interact to generate behaviour, for example, opportunity can influence motivation as can capability; enacting a behaviour can alter capability, motivation, and opportunity. A given intervention (in this case, the credit card ban) may change one or more components in the COM-B model. This model places no priority on an individual, group, or environmental perspective and they all have equal status in controlling behaviour.

The TDF domains have been mapped onto the relevant COM-B components and subdivisions, as shown briefly in Table 2.10 and more fully in Appendix Table A.3. These components were used to develop the topic guide for the interview with people who gamble and informed the thematic framework for the deductive analysis of transcripts from interviews with people who gamble.

Table 2.10 TDF domains and comparison with COM-B model (brief)

COM-B Components	COM-B Subdivisions	TDF Domains ²⁷
Capability	Physical	Physical Skills
		Knowledge
	Psychological	Cognitive and Interpersonal Skills
		Memory, Attention and Decision Processes
		Behavioural Regulation
Motivation	Reflective	Social/Professional Role and Identity
		Beliefs about Capabilities
		Optimisms
		Intentions
		Goals
		Beliefs about Consequences
		Reinforcement
		Emotion
Opportunity	Physical	Environmental Context and Resources
	Social	Social Influences

Interview topic guides

The interviews were guided by a semi-structured topic guide, specifically designed for each participant group: organisational stakeholders (gambling operators, financial operators, and treatment and support providers), people who gambled, and people who were affected by others' gambling. The development of the topic guides for all participant groups was informed by the ToC. Additionally, to provide further nuance and understanding, the development of the topic guide for people who gamble was informed by the behavioural analysis tools COM-B model and the TDF, described above. To ensure that all relevant elements of these tools were covered during interviews, the topic guide was crosschecked with the TDF and COM-B models.

A summary of the key themes explored in the different interviews is described in Table 2.11.

²⁷ Atkins, L., Francis, J., Islam, R. et al. 2017. A guide to using the Theoretical Domains Framework of behaviour change to investigate implementation problems. *Implementation Sci* 12, 77.

Table 2.11 Summary of the themes to be explored in the qualitative interviews

Themes	Interview participant groups
How the ban was implemented.	Gambling Operators
How credit card providers have responded to the ban.	Financial Operators
How operators have minimised the inconvenience to people who gamble for leisure.	Gambling Operators
Barriers and facilitators to the implementation of the ban.	Gambling Operators and Financial Operators
How gambling used to affect them before the ban.	People who gamble and Affected others
Experience of gambling after the ban.	People who gamble, Affected Others, Gambling Operators, and Providers of Treatment and Support
What effects the ban has had on those recovering from gambling-related harms.	People who gamble, Affected Others and Providers of Treatment and Support
How the ban has affected credit card / financial fraud.	Financial Operators and Gambling Operators
How the ban has affected the creation of debt, including borrowing money and bankruptcy.	People who gamble, Affected Others, Providers of Treatment and Support, and Financial Operators
How the ban has affected the experience of safer gambling support by operators.	People who gamble, Gambling Operators, and Providers of Treatment and Support
What effects the ban had on responsible play, including harm awareness and use of safer gambling tools.	People who gamble, Affected Others, Gambling Operators, and Providers of Treatment and Support
What alternative sources of borrowed money people who gamble have used and why.	People who gamble, Affected Others, Financial Operators, Gambling Operators, and Providers of Treatment and Support
What alternative gambling solutions (including unlicensed or black-market gambling operators) have been adopted to bypass the ban and why.	People who gamble, Affected Others, and Providers of Treatment and Support

Qualitative analysis

We used inductive (data-driven) analysis for the interview findings from all participant groups. For the interviews with people who gamble, we conducted additional deductive (theory-informed) analysis, based on TDF and COM-B as described above. Inductive and deductive analysis of the interviews with people who gamble are interlinked given the use of COM-B model and TDF to partially inform the design of the relevant topic guide. The COM-B model and TDF were used to explore in further depth the key themes of people's gambling behaviours and the determinants of behavioural changes to gambling in the context of the credit card ban. .

Inductive thematic analysis

Inductive analysis aims to identify patterns in the data and let themes emerge. This approach is appropriate when studying a new or changing phenomenon given its flexibility and capacity to adapt to new information. All the interviews were initially analysed using an inductive approach. The Framework approach to qualitative data analysis was used to facilitate robust qualitative data management and analysis by case (rows) and theme (columns) within an overall matrix.²⁸ We developed thematic matrices through familiarisation with the data and

²⁸ Ritchie, J., Lewis, J., McNaughton Nicholls, C., & Ormston, R. (Eds.). (2014). *Qualitative research practice: A guide for social science students and researchers* (Second / by Jane Ritchie, Jane Lewis, Carol McNaughton Nicholls, Rachel Ormston.). SAGE.

identification of emerging issues. Each thematic matrix represented one key theme (for example, how patterns in gambling had changed after the implementation of the ban), and the column headings in each matrix related to key sub-topics. The interview data was then summarised in the relevant cells. All qualitative data analysis was carried out using NVivo. The final outcomes of the inductive thematic analysis were compared with those of the survey and with the ToC assumptions. All the interviews (people who gamble, affected others, gambling operators, financial operators, and treatment and support service providers) were analysed using this approach.

Deductive theory-informed analysis

Deductive analysis has the purpose of testing existing theoretical assumptions against fieldwork data. Given that the main aim of this evaluation was to understand the consequences of the credit card ban on the habits and behaviours of people who gamble, we used the COM-B model and the TDF as an additional analytical tool for the interviews with people who gamble. Where COM-B model and TDF were used during analysis, this is indicated in the report by presenting the elements below the inductive thematic headings.

The combined use of the COM-B model and the TDF framework supported the granular mapping of those elements that contributed to specific behaviours and behavioural changes and could indicate the changes that are necessary for interventions to modify such behaviours. Following the inductive analysis of interviews with people who gamble, a thematic framework derived from the COM-B model and the TDF framework, was used to carry out further analysis. Transcripts of the interviews with people who gamble were analysed in NVivo and relevant data was coded by assigning it to one or more of the nodes derived from the COM-B model and TDF domains. The reliability of the coding process was ensured by having a first researcher coding a transcript and a senior member of staff reviewing the codes.

Case notes

Two short illustrative case notes are provided in the sections on changes to gambling behaviour following the ban (Section 4.2) and on financial related harm (Section 5.1). These brief descriptive summaries were included to account for the fact that gambling severity can change in individuals over time. The case notes highlight that there could be a less apparent, although real, impact of the credit card ban on participants who were not gambling currently, but had previously experienced gambling harms associated with the use of credit cards for gambling.

2.7 Limitations of the qualitative methods

There are a number of limitations of the qualitative methods which should be considered throughout.

- While the sampling strategy intended to cover people who gamble with a range of characteristics, the majority of people who gamble who participated were people who reported having experienced problems with gambling in the past, but not at the time of their interview, or people who had never experienced problems with gambling. Additionally, the sampling strategy tried to achieve as diverse a sample as possible, but it was not possible to recruit participants from all the target demographic categories we had intended to reach (e.g., people with a disability, people from the LGBTQ+ community, or people with different income levels were not represented). Nevertheless, a range of views and experiences were obtained in the interviews.
- The sampling of all interview participants was purposive and not representative. Furthermore, the main purpose of recruiting organisational stakeholders for interview was to support the design and development of the topic guides used in interviews with people who gambled and affected others. As such, each group of participants does not represent the views of all who were involved in implementing or experiencing the credit

card ban, and generalising any findings that only rely on the interviews should be avoided. The interviews do however represent the wide range of variability across people's experiences of the ban and help to make sense of how the ban was experienced.

- Deductive analysis may sometimes restrain the scope of a research study by discouraging divergent thinking and limiting the researchers' ability to remain open to unexpected findings. However, we balanced this potential limitation by conducting the inductive analysis of the interviews with people who gambled in parallel with the deductive approach. This has allowed the exploration of a wide variety of findings which were enriched by the behavioural insights derived from the use of the COM-B model and the TDF.

2.8 Ethical considerations

The evaluation research project received ethics approval from a full review by NatCen's Research Ethics Committee, which considered issues of consent, care of participants and researchers, and ethical and secure handling of participant data.

Ethics relating to the quantitative surveys

The quantitative work was based on secondary analysis of anonymised data from the regular Online Tracker Surveys that Yonder conducted for the Gambling Commission. Yonder managed the consent process for survey participants.

NatCen had some involvement in the development of one module of questions that was included in the September 2021 and December 2021 waves of the Tracker Survey, and carefully considered ethical aspects at this research design stage. For example, the questions about criminal activity were worded as hypothetical questions to avoid participants feeling pressurised into disclosing sensitive personal information.

To recruit potential participants for the interviews with people who gamble, an opt-in invitation to be contacted for qualitative interviews was included at the end of the questionnaire. Survey respondents could agree to be re-contacted and add their contact details if interested. Yonder separated these opt-in responses from the main survey before securely transferring via secure file transfer protocol (FTP) small samples of contact details to NatCen, based on a sampling frame to ensure a range of interview participants. A data processing agreement was signed by Yonder and NatCen to cover this specific transfer of participant contact details in line with data protection regulations in the UK.

Ethical considerations relating to the qualitative interviews

The staged consent process for qualitative interview participation is described above in the Interview method paragraph in section 2.6. Consideration for the wellbeing of interview participants was built into the research design at all stages. The participant materials provided in advance gave potential participants enough information to give their informed consent and this was backed up with an opportunity to ask questions during the screening call. The design of the topic guides took account of the sensitive topics, by ensuring a gentle introductory section and the placing of some final neutral and general topics nearer the end of the interview to bring people who gamble and affected others back from the discussion of potentially difficult personal experiences during the middle of the interviews. The research team was experienced in conducting interviews on sensitive topics, listening with empathy while being alert to the participants' needs and offering the option to pause or stop altogether if it became difficult to talk. Following the interviews, an aftercare leaflet was sent,

emphasising that this was provided to all people who gamble and affected others who took part in the project, so they could refer to it if needed.

Researchers had the opportunity for a debrief with the project research director or senior researcher if wished. Care for researchers was also provided through informal support among the research team, discussion of any issues at research team meetings, and training in NatCen's disclosure policy in the event of participants indicating during the interview that they were at risk of harm. Interviews were scheduled and spaced carefully to avoid overburdening researchers.

3. Implementation of the ban

This chapter explores the views and experiences of organisational stakeholders, people who gamble, and people affected by others' gambling on the implementation of the ban. It includes their awareness and perceptions of the ban, and the barriers and facilitators to implementation. The chapter largely draws on evidence from the qualitative interviews.

Summary of key findings



25% of survey respondents (from the general population) were aware of the credit card ban, around 18-20 months after the ban had been introduced. People who were experiencing a high level of problem from gambling were more likely to be aware of the ban's implementation (57%).



Interviews with gambling operators revealed that they collaborated with individual financial companies to identify which cards were credit cards in order to implement the ban. A number of facilitators (e.g., pre-existing partnerships between gambling and financial operators) and barriers (e.g., impact of COVID-19, lack of guidance) were identified.



In interviews with people who gamble, the ban was mostly received favourably and they felt the ban would help prevent financial difficulty and reduce their gambling behaviour. Others perceived the ban to change the way in which they could gamble (i.e., with less spontaneity).



Support providers and affected others both raised concerns that people who gamble may find ways around the ban (e.g., digital wallets, crypto and black market websites).

Evaluation objectives addressed in Chapter 3

- Determine the degree to which the ban has been implemented as intended.
 - Relates to: ToC output:
 - Credit card gambling ban successfully implemented.
- Examine how the COVID-19 pandemic interacted with the implementation and outcomes of the ban.
 - [There was no specific ToC component relating to the COVID-19 pandemic.]

3.1 Awareness of the ban

One quarter (25%) of survey respondents said they were aware of the credit card ban while three-quarters (75%) said they were unaware in answer to the question ‘Were you aware that this ban has been introduced?’. The question was asked retrospectively of the general population, including people who gamble and people who do not gamble, around 18-20 months after the introduction of the ban (in the September and December 2021 survey waves). Among the general population awareness was low, whereas among those who reported (September and December 2021) that they had used a credit card in the last 12 months, 49% were aware of the ban’s introduction, and 51% were not aware of it. This shows that awareness was greater among these survey respondents, but that some people who gamble may still use a credit card for gambling without being aware of the ban.

Respondents whose gambling behaviours placed them in the PGSI category of people experiencing a moderate or high level of problems from gambling reported the highest level of awareness of the ban at 57%, compared with 29% of people experiencing a low level of problems from gambling, 23% of those experiencing no reported problems from gambling, and 11% of people who do not gamble. People aged 55 years and over were less likely to say they were aware of the ban (19%) compared with 27% of 18–34 year olds and 29% of 35–54 year olds. Men were more likely than women to say they were aware of the ban (31% of men compared with 18% of women).

Interviews with gambling operators revealed that they were made aware of the credit card ban in 2019 when the Gambling Commission issued a consultation.

Informing people who gamble about the ban

Gambling operators had to consider who their customers were and how they used credit cards to gamble. There was a feeling expressed in the organisational stakeholder interviews that operators felt conscious of “customer journeys” and giving people who gamble advance warning of the ban. For example, one of the gambling operators stopped customers from adding a new credit card to their account a few months before the ban was implemented.

There was a mixed level of awareness about the ban before its implementation among those who gamble. Being unaware was reported among those who said they received no information from gambling or credit card companies. Among those who were aware of the ban, information about the ban was disseminated through various channels. Interviews revealed that emails from gambling operators were the primary way in which people who gamble came to be aware of the ban. The emails outlined the upcoming changes (e.g., the date of implementation) and explained what the ban meant for people who gamble. The time period in which people

who gamble received emails about the ban was reported to have varied from a few weeks to six months prior to implementation. One response outlined in the interviews with people who gamble was not taking notice of the messaging around the ban and “skim reading” emails. By contrast, pop-up messages on gambling websites and apps were viewed as more useful where there was a tendency to avoid email communication from gambling operators. These pop-up messages were publicised a few days prior to the ban and thereafter.

After the ban came into effect, awareness of the ban among people who gamble who were not already aware of it was gained through news articles, Twitter, and conversations with friends. However, for other people who gamble the ban’s implementation was not apparent until they tried to gamble or deposit money using their credit card.

“I only remember a couple of adverts coming up on a couple of betting websites, just saying soon you cannot do the credit card. I didn't really think too much of it. I kind of just thought it was just a problem with the website, and then I remember trying to pay for something on the credit card and it said not accepted. I thought it might be my credit card, so then I tried on another account and it said the same thing. Then I googled it and then realised that the ban was in place, so that was the end of using the credit card.” – Person who gambles

Affected others said they had become aware of the ban through various means such as through a friend who gambles, googling resources for a friend, and when invited to interview for this evaluation study. It was evident that **affected others would have liked to have known about the ban before its implementation**:

“So maybe it would have been nice to know that it was happening eventually and that I could work out finances and plan all right, he's using credit cards now but from April 2020 he won't be able to use credit cards anymore. So the debt will stop there.” – Affected other

A common view taken by **people who gamble was that they should have been notified earlier** about the upcoming implementation:

“Didn't give you much notice. [...] Suddenly they cannot use any more the credit cards because they put a ban, so people had not enough time to react to do something about it, so they need to have a little bit more time to adjust themselves.” – Person who gambles

Furthermore, in the interviews with people who gamble, it was suggested that **the ban could have been advertised through wider channels** such as TV adverts, in betting shops, and on social media. This view also emerged in the interviews with affected others along with the suggestion that the ban could have been broadcast on sporting channels.

“I think it should have been on the TV, on sports channels. I think it's just something that should've been really, really widely publicised and covered in the press as well. I read the paper every day, and I didn't read anything about it.” – Affected other

An additional view from the interviews with people who gamble was that credit card companies or banks should have been involved in disseminating information surrounding the ban.

Perception of the ban

Several perspectives on the ban emerged among people affected by gambling with credit cards. **Overall, the ban was perceived to be a positive change**, and one that would enable people who gamble to gain control of their financial position, and perhaps reduce gambling activity.

“I think removing the use of credit cards for gambling would definitely have limited the funds that people have access to, and I think yes, it definitely puts them in a position of a bit more self-control.” – Person who gambles

Affected others were in full support of the credit card ban and perceived the ban as a means to prevent people who gamble from incurring debt. Likewise, in the interviews with support providers there was a championing of the ban as a means to reduce the impact of problem gambling; one organisation had responded to the Gambling Commission’s consultation and reported that the majority of service users were in support of the ban. However, across people who gamble and people affected by others’ gambling, the viewpoint that the ban should have been implemented a while ago was highlighted.

“[...] on reflection it amazes me that you were able to use the credit card to do that in the first place.” – Person who gambles

“[...] it was wrong of the Gambling Commission to allow people to bet using money that isn’t really theirs.” – Affected other

An alternative view emerged from the interview data that instead of a complete ban, a limit on credit card expenditure could have been introduced instead. People who gamble who opposed a complete ban expressed that **the ban would make it difficult for them to continue to gamble as they had limited money in their bank account, and therefore would alter the ways in which they were able to gamble**.

“I was really devastated. But when they stopped the use of credit cards, it’s going to be difficult for me to carry on doing my bets because I’ve only very limited money from my bank account.” – Person who gambles

“It sort of ruined the spontaneity a bit because I’m restricting myself to a certain amount each month. When I had the credit card, if I just fancied doing something, I could do it.” – Person who gambles

After the outcome of the consultation had been announced, there was some concern about the implementation timetable, as reported in the gambling operator interviews we conducted, because it seemed that “a lot of work” would be needed from an industry perspective. The responsibility to liaise with banks and financial operators was given to the gambling operators themselves. Reservations about the specific intervention of a complete ban on credit card use for gambling rather than another approach to limit harms emerged in the interviews with gambling operators. While these organisational stakeholders were broadly in support of protecting their customers (e.g., those with poor credit histories) from the harms of subprime²⁹ credit cards (e.g., Wonga) and

²⁹ A subprime is a “credit card with a high interest rate (APR) – between 30% and 70% compared with the average credit card interest rate of 20% – typically offered to those with a low income, who are unemployed or who have an impaired credit file or are new to credit”. From: Step Change (2019). Red card: Time to blow the final whistle on the subprime card debt trap. 9 July 2019. Available at: <https://www.stepchange.org/media-centre/press-releases/subprime-credit-card-debt-trap.aspx>. [Accessed 8 December 2023]

recognised **the need for additional controls, a preference for a risk-based approach was expressed as gambling operators believed that many of their customers were not in financial difficulties from using a credit card**. This was based on customer research a gambling operator had conducted prior to the ban's implementation. Furthermore, a common view shared by both people who gamble and support providers was that people experiencing a moderate or high level of problems from gambling would find a way around the ban (e.g., withdrawing money, digital wallets, and crypto) and use other means to gamble (e.g., an overdraft facility or borrowing money from friends and family). A similar concern of a *waterbed effect* which would have just moved people who gamble from one method of payment to another was also expressed by UK Finance, a banking and finance industry association, in their response to the Gambling Act (2005) call for evidence consultation.³⁰ The interviews with support providers drew out the observation that prior to the ban's implementation, there was concern that people who gamble were starting to turn to higher cost credit, and therefore there was growing use of black-market sites to enable credit card use.

"[...] implementing something doesn't necessarily mean that it will work, it doesn't stop people gambling it just makes it harder." – Support provider

"[...] with people that have a serious gambling addiction, they will literally find ways to put in money and that could be in different ways." – Person who gambles

A feeling that the ban was "not comprehensive enough" emerged from the interviews with support providers, as it did not prevent the use of other types of borrowed money:

"[...] the ban was too narrow as an intervention for a much wider problem." – Support provider

The view was expressed that people experiencing a moderate or high level of problems from gambling used a range of additional sources of money, and ways of getting around the ban will **make it more difficult for affected others to monitor the spending of those who gamble as the money loaded onto digital wallets can be used "without it being tracked back to gambling"**. Other forms of borrowed money can be used more "secretively" according to the interviews with support providers, thus bringing into question the potential outcomes of the ban.

Understanding why the ban was implemented

People who gamble were asked to suggest reasons why they thought the ban was implemented. One view was that the ban was implemented primarily to prevent people from getting into debt by encouraging people to only gamble with their own money. Secondly, the ban was seen as a "practical measure" taken by the Gambling Commission in response to the negative effects the use of credit cards was having on those who gamble, and to therefore mitigate the impacts of gambling (e.g., on mental health).

"I suppose they wanted to mitigate the damaging effects of putting gambling funds on credit cards. Obviously especially people who are really addicted to gambling could be using credit cards and racking up huge credit card debts." – Person who gambles

³⁰ UK Finance response to the Gambling Act 2005 call for evidence consultation (p. 12): Available at: <https://www.ukfinance.org.uk/policy-and-guidance/consultation-responses/uk-finance-response-gambling-act-2005-review-call-evidence-consultation> [Accessed 14 March 2023]

The reasons given by those who gamble for the ban's implementation were echoed in the interviews with affected others. An additional viewpoint about reasons for the ban that emerged in the interviews with affected others was that people who gamble were "abusing" their credit cards owing to the ease in which they were able to use their credit card to gamble and were getting themselves into "serious" debt. In turn, the feeling was expressed that gambling companies and the Gambling Commission realised allowing the use of credit cards to gamble was "unethical" and therefore introduced the ban.

In the interviews, **people who gamble demonstrated clear knowledge and understanding of what the ban meant for their capability to use a credit card to gamble:**

"If I want to make any deposits or anything like that, I have to use another form of financing it, I think I can use PayPal or a debit card, or obviously cash if I'm going into a betting shop." –
Person who gambles

3.2 Implementation of the ban

Barriers and facilitators to implementation

Organisational stakeholders, including both gambling operators and support providers, perceived there to be a number of barriers and facilitators to the ban's implementation.

System level facilitators

Organisational stakeholders identified two key facilitators for the ban's implementation. First, gambling operators had a **good working relationship with some financial and payment operators** (e.g., Mastercard and WorldPay). This allowed gambling operators to use their professional contacts in the financial operator companies to help successfully identify the Bank Identification Numbers (BIN) and ranges (the sequence of numbers on cards). Second, a viewpoint from the interviews with gambling operators held that because the implementation of **the credit card ban was industry-wide this helped to prioritise and focus efforts on implementing the ban**. In a similar vein, support providers expressed that the ban being mandatory aided its implementation.

Moreover, a perspective from e-money organisations was that implementation was relatively "simple" as gambling transactions were already considered high risk before the ban and a checking system was already in place. Therefore, digital wallet organisations were able to block all transactions funded by a credit card that included the merchant code of a gambling operator.

Logistical barriers

A number of barriers to implementation were identified through the interviews with gambling operators. The experience of **technical difficulties for gambling operators in identifying which cards were credit cards** was identified as one barrier. There was not a central or definitive list of credit cards or a system that was able to flag the use of a credit card, and therefore each gambling operator had to work out the Bank Identification Number (BIN) ranges individually.

Limited involvement of financial institutions and coordination in ban implementation

A related barrier was **the lack of coordination and collaboration among all parties involved in the ban's implementation**. Interviews with gambling operators suggested that cooperation and coordination between financial and gambling operators was limited in the period leading to the implementation of the ban. Gambling

operators had to identify what cards were considered credit cards in an ad hoc process by going through their own contacts at banks or financial operators such as WorldPay to determine what the BIN ranges (the sequence of numbers on cards) were. Gambling operators reported that the process of identifying the BIN ranges was particularly difficult with online payment companies (e.g., PayPal or Apple Pay) and due to the frequent launch of new financial products by banks. Some of the online payment companies were described as “non-committal” about introducing the ban and communication became infrequent between the financial and gambling operators.

From the perspective of an e-money organisation, it was apparent that their work capacity was limited, and coordination was therefore on a one-to-one basis between individual digital wallet operators and gambling operators. Conversations centered around how the ban would work and who would be liable if a payment was to go through with a credit card.

It was perceived that the Gambling Commission did not arrange the meeting of various parties and therefore carrying out the necessary steps for the ban’s implementation was logistically time consuming. **The implementation timetable was also considered to be too short** by gambling operators and this heightened the concerns around identifying credit cards and liaising with financial operators. Gambling operators suggested that the Gambling Commission could have acted in accordance with the Financial Conduct Authority to centralise and coordinate the implementation. Similarly, e-money organisations recommended the development of a “common strategy” between themselves and gambling operators as it was challenging trying to explain to gambling operators and the Gambling Commission how the ban would work in practical terms for e-money companies.

Unhelpful guidance

The Gambling Commission published guidance for gambling operators after the ban came into effect, and therefore during the period of implementing the ban, but gambling operators expressed that the information was “unhelpful”. For example, gambling operators suggested that the Gambling Commission did not have a full grasp or understanding of how the payment markets (e.g., Google Pay and Apple Pay) worked. The information around how the ban would work in these payment landscapes was “confusing” at times.

Impact of the COVID-19 pandemic on the implementation of the ban

The beginning of the COVID-19 pandemic coincided with the implementation of the credit card ban, and therefore posed another barrier when implementing the ban. The timing of the implementation of the ban became difficult as many of those working for gambling operators were working from home, and staff were also unwell with COVID-19. As staff were situated at home, this caused concern around their ability to implement the technical changes required for the ban (i.e., access to equipment and coding). The operational and technical capacity to put “live technical code” on products in a remote setting was “untested”. Adapting to a new way of working while trying to implement the ban put a further strain on the timeline.

3.3 Summary of evidence in relation to the Theory of Change

Table 3.1 below maps evidence on the implementation of the ban to the relevant elements in the ToC. For this chapter, the summary evidence in the table is drawn from the qualitative interviews only. This is because the Gambling Commission’s own monitoring data evaluated the implementation of the ban (see section 1.2). As set out in our Scoping Report for the evaluation, there was no survey data available to evaluate the ToC assumptions in the table below.

Table 3.1 Summary of evidence in relation to the Theory of Change

Output: Credit card ban successfully implemented	Findings from interviews with organisational stakeholders, people who gamble and affected others
Assumption: Operators implement the ban effectively and on-time	<p>Start-up assumptions related to operator and other preparations for the ban to be effective from 14 April</p> <ol style="list-style-type: none"> 1. Appropriately adapt and modify their systems to ban payment by credit cards <ul style="list-style-type: none"> – Gambling operators were able to identify BIN ranges with assistance of financial operators to ban the correct cards. – Gambling operators adapted to working from home environment and overcame logistical barriers (e.g., equipment, remote coding, etc) to modify their systems and implement the ban. 2. Organise and facilitate any dependencies on payment processors, so that the ban could be implemented for the start date <ul style="list-style-type: none"> – Worked with financial operators to identify BIN ranges. This was not a centralised process, and happened using individual contacts. – Communication with online payment companies was minimal. 3. Organise and implement any required changes to client terms and conditions and associated pre-ban communications with customers <ul style="list-style-type: none"> – Some pre-ban communications involved emails to customers outlining the upcoming changes. 4. Communicate the start of the ban, and how it will affect gambling payments, to all their customers in ways which minimise disruption to their customers <ul style="list-style-type: none"> – Some people who gamble were unaware of the ban and did not receive any correspondence from gambling operators. For those who were aware of the ban, the information came via email from gambling operators and pop-up messages on gambling websites. – Some customers felt well-informed prior to the ban's implementation (e.g., heard 6 months before), while others felt they were not given enough warning and not enough time to adapt their gambling activities to the new regulations. – Some gambling operators communicated at the start of the ban via pop-up messages on gambling websites and apps. – One gambling operator prevented customers from adding new credit cards to their gambling accounts in the months preceding the ban. 5. Communications with customer about the credit card ban will also be safe and reliable <ul style="list-style-type: none"> – Communications were not always reliable – some people who gamble reported that they would avoid emails from gambling operators and therefore took no notice of the messaging around the incoming ban. Other people who gamble said they skim read information or took no notice of pop-up messages. – People who gamble and affected others made recommendations that communications could have been disseminated through wider channels (i.e., through banks / credit card companies, sports channels, social media, etc). 6. Operators will be motivated to ensure that the start-up requirements are in place and working, because of the combination of potential enforcement action and reputational harm <ul style="list-style-type: none"> – Limited evidence from interviews with gambling operators. However, there was some discussion that the fact the ban was industry wide helped facilitate the implementation of the ban (e.g., a concerted focus / effort).
Assumption: Financial institutions block credit card payments to digital wallets	<p>Technical assumptions, mainly systems oriented assumptions (payment service providers will be able to distinguish (block) credit card payments for in-scope gambling-related merchant category codes and will put in place any technical or capacity adjustments necessary to ensure compliance).</p> <ol style="list-style-type: none"> 1. Financial institutions that formerly facilitated credit card payments for gambling will also be able to put in place, and communicate to credit card holders, the necessary changes to terms and conditions for consumers and within the required notice period (2 months as required by Payment Services Regulations) <ul style="list-style-type: none"> – Digital wallet organisations have blocked all transactions funded by credit card that include the merchant code of gambling operator. Gambling transactions were already considered high risk transactions before the ban (due to anti-money laundering regulations), so the checking system was already in place. – Digital wallet companies also introduced a "double-wallet system" with digital wallets dedicated only to gambling. This was necessary to avoid, for example, situations where someone transfers funds from both their own bank account and from their credit card to get around the ban. The gambling-dedicated digital wallet only accepts transfer of funds from your own account.

4. Impact on gambling patterns and behaviours

In this chapter we describe what happened when the ban was introduced. We look at whether and how people who had been using credit cards to gamble with pre-ban made changes to the way they paid for gambling, or to their levels and patterns of gambling after the ban. Lastly, we consider the impact of the COVID-19 pandemic on people's gambling with credit cards and borrowed money, in the context of national lockdowns and restrictions.

Summary of key findings



Among all people who gambled, in an adjusted model, there was a lower likelihood of gambling with a credit card after the ban was implemented compared with before the ban (AOR 0.82*), while among people experiencing a moderate or high level of problems from gambling, the likelihood of gambling with a credit card was 1.36 times higher (AOR 1.36*) after the ban compared with before the ban.



Among people who gambled with credit cards, responses to the ban varied, from trying to use credit cards after the ban was in place, to immediately switching to another method of payment, to stopping their use of credit cards before the ban. There were some reports of placing credit card deposits into gambling accounts before the ban and of using credit cards with digital wallets for a short period following the ban, while others easily accepted the ban.



Longer-term responses to the ban among people who had used a credit card to pay for gambling varied. There was a conscious switch to gambling with other sources of money and to use credit cards for everyday living expenses among people with credit card debt and frequent gambling. Among others with lower levels of gambling and no debt, no substitution was reported and the ban gave an opportunity to reflect and perhaps reduce gambling overall.



People who were experiencing a moderate or high level of problems from gambling and who were still gambling were more likely to say that the COVID-19 pandemic itself and its impact on them made them either more likely (22%) or less likely (30%) to borrow money for gambling, compared with all people who gambled and had not stopped (4% more likely and 17% less likely).

Evaluation objectives addressed in Chapter 4

- Examine the extent to which credit card users changed their gambling behaviours as a result of the ban.
 - Relates to ToC outcomes:
 - Increased friction results in a ‘pause’ in gambling, greater self-reflection, and changed gambling patterns; and
 - There is a reduction in credit and other forms of borrowed monies used by ‘debt-risk gamblers’.
- Understand the impact of the ban on affected others and people who gamble who are not currently experiencing harm.
 - Relates to: ToC output: Credit card gambling ban successfully implemented.
- Examine how the COVID-19 pandemic interacted with the implementation and outcomes of the ban.
 - [There was no specific ToC component relating to the COVID-19 pandemic.]

4.1 Credit card use for gambling after the ban

Scope of the ban on use of credit cards to pay for gambling

The evidence below from the survey data and from the interviews demonstrates that after the ban there was some incidence of credit cards being used to pay for gambling. Such reported uses do not necessarily indicate a breach of the ban. Firstly, people could use credit cards **indirectly** in a number of ways to pay for gambling and these were not covered by the ban.³¹ Equally, some forms of **direct** use of credit cards for gambling were not prohibited by the ban, e.g., purchasing national lottery tickets along with other items such as groceries.

Earlier qualitative research commissioned by the Gambling Commission indicated that people were not always certain of the difference between credit cards and debit cards, which may explain some of the reported use of credit cards following the ban. In our own interviews with people who gamble however, this confusion did not emerge as a theme. Both direct and indirect use of credit cards for gambling are discussed further on page 63 below.

Summary of regression models used

To guide the reader through the findings presented in this section, Table 4.1 below summarises the different analyses we report on, comparing the five pre-ban waves (which fell between December 2018 and March 2020) to the two post-ban waves (March and June 2021). The table lists the three outcomes we report in this chapter on the left: use of credit cards for gambling in the last 12 months; whether someone is experiencing a moderate or high level of problems from gambling according to their PGSI score; and whether someone has used any form of borrowed money for gambling in the last 12 months (including use of a credit card). For each of these three outcomes a set of binary logistic regression models were estimated to identify whether the ban was related to a

³¹ Examples of indirect use of credit cards for gambling include withdrawing cash using a credit card and paying for gambling with cash, transferring funds from a credit card allowance to a bank account and linking that to gambling accounts, or adding an amount from a credit card to a digital wallet and using this to pay on a gambling site or app.

person's odds of experiencing that outcome. This was done by including whether each case was pre- or post-ban as a binary predictor in the logistic regression model.

For each outcome we first present in Table 4.1 an unadjusted model including only the ban as a predictor, an adjusted model controlling for people's socio-demographic characteristics, and finally three stratified models, which group the sample by PGSI category. That is, we divide the sample into three groups (those experiencing no reported problems from gambling, those experiencing a low level of problems from gambling, and those experiencing a moderate or high level of problems from gambling), and reproduce the same analysis for each group to explore whether they were affected differently. The exception to this was the PGSI category outcome, where it would not be possible to produce an analysis stratified by PGSI category. This was because the stratified models each contained data from respondents in only one of the three PGSI categories.

The full version of this table can be seen in chapter 2 (Table 2.8) which provides additional details.

Table 4.1 Summary of regression models presented in chapter 4

Outcome	Unadjusted model	Adjusted model*	Stratified models (by PGSI category)		
			People experiencing no problems from gambling	People experiencing a low level of problems from gambling	People experiencing a moderate or high level of problems from gambling
Use of a credit card to pay for gambling	✓	✓	✓	✓	✓
PGSI category (whether experiencing a moderate or high level of problems from gambling)	✓	✓	N / A	N / A	N / A
Use of borrowed money to pay for gambling	✓	✓	✓	✓	✓

* Adjusting for gender, age, marital / relationship status, socioeconomic status and PGSI score category (note – PGSI category is not included as a control in the model where it is an outcome). The stratified models are also adjusted for the same covariates, excluding PGSI category.

Gambling with a credit card – differences following the ban

In the pooled dataset of five pre-ban waves and two post-ban waves of the tracker survey, most respondents did not use borrowed money to gamble with, but of those who did, credit card borrowing was the most commonly reported means. For instance, in the June 2021 wave, 86% of participants did not use any borrowed money to gamble with, while participants who reported borrowing money used a credit card (9%), an overdraft facility (4%), borrowed money from family and friends (4%), other loans (3%), or payday loans (2%). Below we provide details and discuss differences in using all types of borrowed money for gambling after the ban, and then differences in using credit cards for gambling following the ban.

Preliminary analysis of the March 2020 pre-ban and the March 2021 post-ban waves only indicates that among those who gambled, 6% in the March 2020 and 8% in the March 2021 wave said they had used a credit card to gamble with in the past 12 months.³² This was not a statistically significant increase.

We then extended our analysis to cover the five pre-ban survey waves and two post-ban waves (our main analysis) among respondents who said they gambled. The same result was seen in these combined waves, that among all those who gambled there was **no statistically significant difference between those in the post-ban waves and their likelihood of using a credit card, compared with those in the pre-ban waves**. In an **adjusted model**, after controlling for age, gender, ethnicity, marital or relationship status, socioeconomic status, and PGSI score category, **among all people who gambled, those in the post-ban survey waves had a lower likelihood (AOR 0.82*) of reporting that they had used credit cards to gamble compared with those in the pre-ban waves**.

In further **adjusted models, stratified by PGSI categorisation** there were statistically significant differences in the likelihood of using credit cards to gamble among those in the post-ban waves compared with the pre-ban waves. Specifically, **among those experiencing no reported problems and a low level of problems from gambling, those in the post-ban waves were less likely to report using credit cards to gamble with (AOR 0.43*** and 0.29*** respectively) compared with the same PGSI category in the pre-ban waves**. In the **stratified model of those classified as those experiencing a moderate or high level of problems from gambling, by contrast, the likelihood of using credit cards to gamble was increased (AOR 1.36*) in the post-ban waves compared with the pre-ban waves**.

It was important to explore the role of PGSI category on use of credit cards for gambling, because among people experiencing a moderate or high level of problems from gambling, use of credit cards (and other forms of borrowed money) to pay for gambling is far more common. This can be illustrated by the prevalence of self-reported use of credit cards for gambling, across all the waves of the pooled dataset pre- and post-ban (December 2018–March 2020, March and June 2021). Among people experiencing a moderate or high level of problems from gambling, 31% used a credit card to gamble, compared with 9% of people experiencing a low level of problems from gambling, and 3% of those experiencing no reported problems from gambling.

A similar pattern was identified with other forms of borrowed money (see below for more detail). People experiencing a moderate or high level of problems from gambling were more likely to have used an overdraft facility (17%), compared with 4% of people experiencing a low level of problems from gambling, and less than 1% of people experiencing no reported problems from gambling. Likewise, borrowing money from friends or family to gamble was more prevalent among people experiencing a moderate or high level of problems from gambling (13%) compared with people experiencing a low level of problem from gambling (2%).

PGSI category in the survey samples

As described in chapter 2, we analysed the pre- and post-ban survey waves by gambling severity status (PGSI category). The intention was to identify any statistically significant differences in the PGSI score category of respondents in the samples before and after the ban, which might contribute to any effects on gambling behaviour post-ban, including gambling with credit cards. In the March 2021 post-ban wave, 14% of respondents

³² There is a potential issue of recall here (and elsewhere in the quantitative findings when the question asks about people's behaviour over the course of a year). It may have been difficult for people to remember how they paid for gambling over that period. However, the questions were asked consistently before and after the ban, meaning any error introduced would be consistent between these timepoints. By asking about gambling activity over the course of a year, the impact of seasonality, where gambling behaviour varies by season, could be mitigated.

experienced a moderate or high level of problems from gambling, compared with 13% of respondents in the same risk categories in the March 2020 pre-ban wave. In our preliminary analysis of these two waves, there was no significant difference in the proportion of individuals who experienced a moderate or high level of problems from gambling.

However, in our main analysis, using the pooled sample, 14% of respondents in the post-ban sample experienced a moderate or high level of problems from gambling according to PGSI categories, compared with 11% of respondents in the pre-ban sample. Binary logistic regression indicated that respondents were more likely (OR 1.34^{***}) to experience a moderate or high level of problems from gambling in the post-ban waves compared with the pre-ban waves. This result remained significant in the adjusted model, after controlling for age, gender, ethnicity, marital / relationship status, and socioeconomic status (AOR 1.31^{***}).

It should be noted that this result does not show what would have happened in the absence of the ban. The ban may have encouraged some people experiencing a low level of, or no reported problems from gambling **not** to increase their gambling, stopping them from experiencing more problems from gambling. In other words, in the absence of the ban, there might potentially have been a larger increase in the number of people experiencing high levels of problem from gambling in the post-ban wave compared with the pre-ban wave.

The increase in the number of people experiencing a moderate or high level of problems from gambling in the sample is important because PGSI category was associated with how likely someone was to use a credit card to gamble with. In the March 2021 and June 2021 survey waves, of those respondents who said they gambled with a credit card post-ban, 83% were people experiencing a moderate or high level of problems from gambling, while 6% were people experiencing a low level of problems from gambling, and 11% were people experiencing no reported problems from gambling.

Interpreting the survey findings on differences in prevalence of gambling with a credit card following the ban

To put the above survey results in context, it is worth noting (as also reported above) that the proportion of respondents experiencing a moderate or high level of problems from gambling increased during the period post-ban compared with pre-ban, and this may explain the survey finding of a slight increase in people's likelihood of gambling with a credit card. In the unadjusted model there was a slight, non-significant increase in credit card use among all types of people who gamble (from 8% to 9%). However, in the adjusted model controlling for the impact of PGSI categorisation there is a slight decline in the likelihood of people using a credit card to pay for gambling (AOR 0.82^{*}). This may indicate that the overall slight increase of numbers of all people gambling with a credit card in the unadjusted model is explained by an increase in gambling with a credit card by people experiencing moderate or high level of problems from gambling.

This can be more clearly explained when looking at the PGSI category separately in the stratified models. There was a reduction in the prevalence of gambling with a credit card in people experiencing no reported problems from gambling post-ban (1%) compared with pre-ban (3%), and in those experiencing a low level of problems from gambling (4% post-ban compared with 11% pre-ban). By comparison, people experiencing a moderate or high level of problems from gambling had a higher prevalence of using credit cards post-ban (36%) compared with pre-ban (28%). This suggests that the ban has worked best for people experiencing a low level of problems from gambling but has not had a significant effect for people experiencing a moderate or high level of problems from gambling. This interpretation is supported by our findings from interviews with people who gamble and with people affected by others' gambling, which are reported below.

People's behaviour with credit cards in the weeks before the ban and experiences of trying to use credit cards for gambling after the ban

(COM-B: capability; TDF: knowledge; memory, attention and decision processes)³³

Once people were informed of the credit card ban, behaviour around credit card use varied in the weeks before the ban was implemented. One response among people who gamble was to switch to using their debit card as soon as they heard about the ban, and change their payment methods on pre-existing gambling accounts. Another response was to reduce the number of active gambling accounts.

"I was getting messages to say that from April 2020, you'll no longer be able to use your credit card, due to the Gambling Commission or something changing it. I thought to myself, I'll just use my debit card then. That way I'm not going to spend as much money as I used to."

– Person who gambles

Lastly, another response among people who gamble, was to continue with credit card use right up until the ban's implementation, or until a message at the point of transaction was received asking for a different payment method.

Moreover, from interviews with people who gamble, moving money from a credit card to a current account was another behaviour change in the weeks before the ban was implemented. People who gamble also deposited money from their credit card to their gambling accounts to ensure they had enough money to gamble with once the ban came into effect. However, another approach reported was to refrain from transferring money from a credit card to a current bank account or gambling account owing to concerns about having to pay it back or there being further incentive to gamble.

"If you've already deposited a large amount, then I'd see that as too much of a temptation."

Person who gambles

In the interviews, people who gamble confirmed that when the ban was implemented they were prevented from using their credit cards on gambling websites and apps.³⁴ One type of immediate response to the ban was easy acceptance and adjustment. This could be due to being fully aware of the ban and having prepared by stopping using credit cards in advance, or being aware of the ban, even if vaguely, so that the rejection of the credit card was not a surprise, or lastly not being concerned about the change despite not knowing about it in advance.

"Something has triggered in my mind that I've seen something about this ban and thought, oh yes, I'll have to set up a debit card now because I can't use this anymore."

Person who gambles

Among people who were gambling frequently and experiencing gambling-related debt, and had not been aware of the ban, an immediate response of confusion was reported about whether their credit card limit had been reached or their card was faulty, leading them to try multiple gambling websites and eventually learn about the ban from a gambling website or by searching online.

³³ The use of COM-B domains and TDF constructs presented in the reporting of qualitative interview findings is described in section 2.6.

³⁴ Betting shops were closed in April 2020 when the credit card ban was implemented because the UK was in the first national lockdown during the COVID-19 pandemic.

“I googled it and then realised that the ban was in place, so that was the end of using the credit card.” – Person who gambles

One reaction among people who gamble, who had been aware that the ban was coming in and knew when it was implemented, was to not try their credit card at all as they knew it would not work. Alternatively, there was some caution about what might happen if a credit card payment was attempted, for example their credit card might be blocked. Among people who had already stopped using credit cards for gambling some time before the ban came in, there were no reports of trying to use credit cards around the time of the ban or immediately afterwards.

Interviews with people affected by gambling echoed these findings, although friends and relatives were not always fully aware of what people were trying. There was mention of anger and confusion about whether the credit card was faulty in the context of a friend whose gambling had increased dramatically at the start of the pandemic.

Gambling with borrowed money – differences following the ban

In the March 2020 survey wave, immediately before the ban was implemented, 10% of those who gambled said they had used borrowed money to gamble in the previous 12 months. In the March 2021 survey wave, one year after the ban, 11% of those who gambled reported using borrowed money to gamble in the previous 12 months. In our preliminary analysis comparing these two waves, the Wald test found no significant difference in the prevalence of using borrowed money to gamble in the previous 12 months post-ban compared with pre-ban.

In the main analysis, covering five pre-ban waves (December 2018–March 2020) and two post-ban waves (March and June 2021), there was no significant difference in the likelihood of using borrowed money to gamble in the previous 12 months post-ban, compared with the pre-ban waves. By contrast, after controlling for age, gender, ethnicity, marital or relationship status, socioeconomic status, and PGSI category, those in the post-ban waves were significantly less likely to have borrowed money in the past 12 months (AOR 0.65***) compared with respondents in the pre-ban waves.

In the main analysis we conducted further models, stratified by PGSI, on the same five pre-ban waves and two post-ban waves. In these stratified models, we controlled for the same sociodemographic characteristics as above, with the exception of PGSI category. We found that in those experiencing no reported problems from gambling, there was a lower likelihood of using borrowed money to gamble in the previous 12 months among the post-ban group (AOR 0.35***) compared with the pre-ban group. Similarly for people experiencing a low level of problems from gambling, those in the post-ban group were less likely (AOR 0.38***) to say they had used borrowed money to gamble in the previous 12 months, compared with the pre-ban group. In the stratified model for those experiencing a moderate or high level of problems from gambling however, there was no statistically significant difference in the likelihood of using borrowed money to gamble in the past 12 months post-ban compared with pre-ban.

In summary, our analysis of the self-reported use of borrowed money to gamble in the previous 12 months suggests that **overall there was no measurable effect from the introduction of the ban on the use of borrowed money by people who gambled**. However, after adjusting for various sociodemographic characteristics and for PGSI categorisation, among all respondents who said they gambled, the likelihood of having used borrowed money to gamble post-ban was lower compared with respondents in the pre-ban waves. We explored this further using stratified analysis and found that those experiencing no reported problems from gambling and those experiencing a low level of problems from gambling were less likely to use borrowed money

to gamble in the post-ban waves compared with the pre-ban waves. This effect was not seen for people experiencing a moderate or high level of problems from gambling.

Changes to payment methods for gambling after the ban

(COM-B: *psychological capability*; TDF: *knowledge*; COM-B: *automatic motivation*; TDF: *emotion*)

Our interviews with people who gambled and with those affected by others' gambling indicated that, after the credit card ban was implemented, people who wished to continue gambling online or on gambling apps made some changes to the way they paid for their gambling. Responses included directly switching default payment details to a debit card or switching to PayPal linked to a bank account. It was suggested that for a short time, it was possible to continue linking a credit card to PayPal and using this to gamble, or by using other digital wallets such as Squirrel.

These experiences of being able to use digital wallets after the ban, even if for a short time, are in accord with organisational stakeholder comments that although guidance to gambling operators about e-accounts was provided by the Gambling Commission it arrived late in the day and perhaps even after the ban was introduced. There was a sense that the Gambling Commission may have insufficiently understood the e-accounts payments market. As there was no involvement of the Financial Conduct Authority in the ban or its implementation, it was left to gambling operators to refuse digital wallets transactions if they were not compliant with the ban, and to approach companies like PayPal themselves to ensure that credit card payments for gambling were being blocked.

The switch to using debit cards was reported by people who gambled as being easy, and not to have made much difference:

"I haven't looked back really. Instead of using one piece of plastic, I switched to another piece of plastic. In that sense it didn't make much of a difference to me". – Person who gambles

However the minimum deposit of £10 required by some gambling websites for setting up a debit card was felt to be a bit "crafty" (Person who gambles) and PayPal (a digital wallet) was seen to be better value with only a £5 deposit required and an easier set up process in the gambling account.

Among people negatively affected by others' gambling, awareness of the credit card ban helped them to encourage and reinforce the move away from credit card use, through informing the person who gambles about the ban, or taking control of finances and cutting up credit cards so these could not be used for cash withdrawal as a way to get around the ban.

Feelings about not being able to use credit cards after the ban

(COM-B: *automatic motivation*; TDF: *emotion/ reinforcement*; COM-B: *reflective motivation*; TDF: *beliefs about consequences*)

There were positive feelings about the credit card ban, including expressions of happiness that it would no longer be possible for the individual, and for people generally, to build up gambling-related debt:

"I thought it was a good thing because I'm not going to rack up a huge credit card bill now. It did work, it did, it saved me a lot of money." – Person who gambles

One person whose husband gambled noted that the ban had made him feel better and less alone in relation to his gambling:

"[I]t made him realise he wasn't on his own in having done it, [which] takes away some of the shame, and it means he can place some responsibility on the people that let you place that bet." – Affected other

This positive feeling was tempered among people who had experienced gambling-related harms and debt before the ban was implemented by a feeling of envy and regret that it had not been introduced earlier, although the ban was still welcomed. In particular, the timing of the ban was viewed as regrettably too late to mitigate the impact on gambling harms of the introduction of smartphones and 24/7 availability of gambling:

"If it had happened a good few years sooner and action was taken maybe when the smartphone was introduced, obviously where betting became available all day every day, I think it would have probably saved a lot of people like me." – Person who gambles

There were feelings of annoyance among people who were gambling heavily with credit cards about not being able to gamble with credit cards. The annoyance was followed by a switch to other payment methods or in some cases where people had incurred heavy debts, the response to the ban was a search for other ways of funding the gambling, discussed below and in chapter 5. One person who gambles explained why he wanted to continue gambling with credit cards to win back the money he had already lost:

"You want to keep gambling, and particularly when you're into the loss-chasing and you want to try and recoup the money you've lost." – Person who gambles

Negative feelings about the ban were also reported in the context of people who gambled moderately using their knowledge of sports to remain in control, or for whom using a credit card for gambling was a cheaper way to gamble a bit more on key events, knowing that they would pay off their credit card balance. The credit card ban for this type of gambling was felt to be inconvenient. It removed the possibility of gambling larger sums when regular income was tight, and also meant that the benefit of the interest free loan was no longer available.

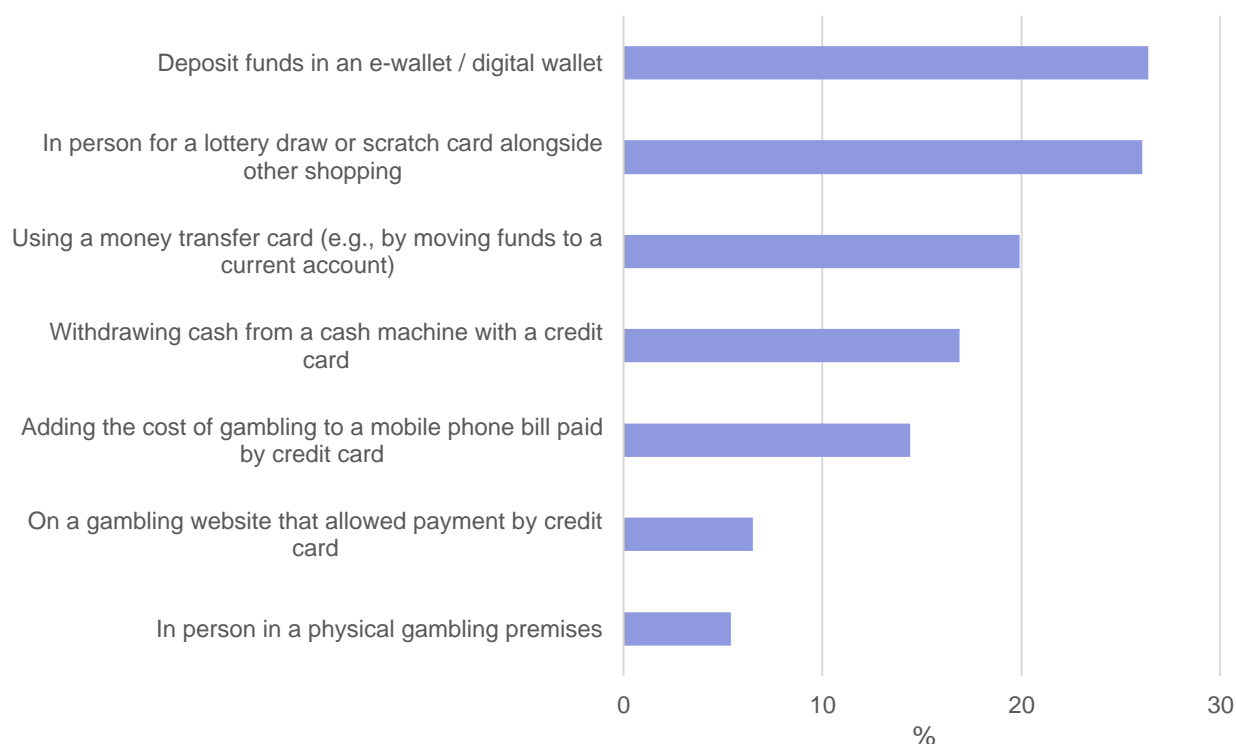
Among people affected by the gambling of others, emotions such as happiness and a reduction in stress and worry were mentioned as positive impacts of the credit card ban when the person stopped using credit cards. These feelings arose from the realisation that the person could concentrate on reducing their debts and would not be able to start gambling with new credit cards, that the ban had acted as a turning point to change their worsening gambling, and that the secrecy of credit card use for gambling had been removed. In the short term at the time of the ban's implementation, anger and frustration expressed by the person who gambles were mentioned as having a negative impact on the affected person.

Prevalence of direct and indirect use of credit cards following the ban

Among all respondents who said they gambled post-ban, in the March 2021 and June 2021 survey waves, the prevalence of using credit cards directly for gambling was six percent and the proportion gambling indirectly with a credit card was four percent. There was some overlap between these groups, so among those who gambled and used a credit card for gambling post-ban, 74% said they had used credit cards directly to pay for gambling, and another 51% said they had used one indirectly. This question did not explore what people considered 'indirect' and 'direct' credit card use. However, in the separate module of questions asked in September and December 2021, credit card users when gambling were asked about a series of more specific possibilities.

These are presented in Figure 4.1 below to illustrate how people reported using credit cards for gambling post-ban. These are primarily indirect forms of credit card use, or direct forms which are allowed under the ban – such as using a credit card to pay for a scratch card alongside other shopping.

Figure 4.1 How credit cards were used to pay for gambling after the credit card ban



Source: Gambling Commission online tracker survey, waves September and December 2021.
Base: People who had used a credit card to gamble in the past twelve months (n=60)

It is not clear how people were able to use a credit card when gambling in person at physical gambling premises, which would be blocked by the ban, although this is quite an uncommon response (reported by five percent of this small group of respondents). Earlier qualitative research for the Gambling Commission has found that people who gambled were not always certain about the difference between a credit card and a debit card, which may account for some of this finding, although this did not emerge as a theme in our interviews with people who gamble.

Indirect use of credit cards to pay for gambling

(COM-B: psychological capability; TDF: knowledge; behavioural regulation; COM-B: physical opportunity; TDF: environmental context and resources; COM-B: reflective motivation; TDF: beliefs about consequences;)

There were varying views about the indirect use of credit cards to pay for gambling in the interviews, such as making a cash withdrawal or transfer from a credit card to a bank account, using credit cards for living expenses to make funds available for gambling, or depositing credit card funds to a digital wallet. People who reported not indirectly using a credit card for gambling, spoke about the costs of making cash withdrawals from credit cards to use for gambling as a disincentive. They also mentioned the negative connotations that looking for indirect methods had for them with issues such as debt, addiction, and problems with gambling. Further, there was some lack of awareness of how it would be possible to divert credit card funds to an indirect route to pay for gambling. As noted above, there was some evidence from the interviews of making a credit card deposit to gambling

accounts in the weeks before the ban as a way to get around it for a short while. Other responses among those who had been aware of the ban before it was introduced included not doing anything differently until the ban came in, or stopping using their credit cards for gambling a little early once they knew about the ban.

Among people who had reduced their gambling or gambled at a moderate level without debt, credit cards were used but were not considered to be indirectly sources of funds for gambling. This could be because the card was used to get points or guarantees for expensive purchases. Alternatively, it could be because, while there was significant gambling-related debt on other credit cards, these were being paid down and one separate credit card with a small credit limit was kept for emergencies. By contrast, **among people who were using credit cards extensively for gambling and had debts at the time of the ban there was a very conscious switch from gambling with credit cards to paying for everyday costs on the credit card and continuing to gamble with other sources of money, for example debit cards.** For one person who gambles, who after the ban was spending all his monthly income on gambling, this meant that his regular expenses were partly paid from his credit card account:

“That meant my living expenses then went on credit, either credit card or loan.” – Person who gambles

The impact of ‘flipping’ the spend on gambling from credit card to debit card was felt not to have made much impact on the level of gambling in these situations of high gambling spend. One outcome of turning to other sources of payment and funding after the ban, among people who experience high levels of gambling problems, was that credit card debts remained to be paid, while debt from other sources such as bank loans continued to increase. PayPal Credit which was classed as a loan rather than a credit card was another source. This was felt by one person who gambles to represent “a loophole” in the ban. Use of alternative sources of borrowed money are further described in chapter 5.

A theme among people who had been affected by others’ gambling with credit cards was not always being in a position to know whether the person was using credit cards indirectly. There was one view that it was unlikely to be happening. In one case, cutting up the person’s credit cards to prevent them from withdrawing cash to bet in person was a solution arrived at in the month after the ban was introduced. Another viewpoint was that in the context of knowing a person who continued to gamble at a high rate and had large debts, it could be assumed that they would have taken out a payday loan. However the main theme among affected people was that they did not always know in detail what the person who gambles was doing.

4.2 Changes to gambling behaviour after the ban

As well as changes to the method of payment on gambling websites discussed in the previous section, there were also some changes in the way people gambled and funded their gambling after the ban.

Changes to gambling behaviour and ways of funding it

In a module of survey questions asked in September 2021 and December 2021, all those who had ever gambled were asked about their gambling behaviour and how they funded it since the ban was introduced in April 2020. Over half (57%) had only gambled with their own money since the ban, while 14% had stopped gambling altogether since the ban. A small minority were gambling on credit or with borrowed money, with two percent saying they gambled with a credit card directly or indirectly, and one percent saying they had gambled with other types of borrowed money, such as a loan or overdraft.

Among respondents who would be considered **at moderate risk or to have problems with their gambling**, **12% said they had gambled with a credit card since the ban**, while eight percent said they had gambled with other types of borrowed money. Among people experiencing a low level of problems from gambling two percent and one percent respectively said that they gambled with credit cards or other borrowed money, while among people experiencing no reported problems from gambling, these types of paying for gambling were both negligible.

Amount and level of gambling following the ban

(COM-B: psychological capability; TDF: behavioural regulation; COM-B: physical opportunity; TDF: environmental context and resources; COM-B: reflective motivation; TDF: beliefs about consequences)

The credit card ban provided an opportunity for reflection about some aspects of gambling behaviour among people we interviewed and a moment for making changes. For example, creating a dedicated debit account for gambling and depositing a set amount each month as a way to control the spend, reducing the number of gambling accounts held, or reviewing personal finances and starting to budget for gambling after paying bills. Among participants who had stopped gambling before the ban, knowing it was in place provided some comfort and security, even though the ban did not have a direct or sole influence on their behaviour. The interview case note below illustrates the views about usefulness of the credit card ban from someone who, at the time of our quantitative and qualitative fieldwork, classed themselves as someone who does not gamble.

Interview case note 1: Person who does not gamble currently but has a history of problems with gambling and debt

Gambling status and history: P1 had gambled alone for around 15 years and had not spoken with anyone about problems they experienced with gambling and debt. Their gambling started feeling out of control when they began using online slots and they had ended up with a five-figure credit card debt.

Changes to behaviour following the ban: A change of living circumstances during the national lockdown at the start of the COVID-19 pandemic, which made it harder to access online gambling sites, led P1 to reflect and to stop gambling with the help of GAMSTOP's global exclusion facility. They were vaguely aware of the ban at the time of its introduction. P1 transferred the credit card debt to a secured loan which they were paying off steadily. P1 described themselves as having stopped gambling, however they also mentioned that they do now buy lottery tickets with a debit card or cash.

View on the usefulness of the ban: The credit card ban coincided with but did not play a direct part in P1 stopping gambling. However, P1 reported that knowing the ban was in place made them feel secure that they would not re-start gambling and getting into debt again.

"It's about having as many tools in my little tool bag to stop that temptation or deal with that temptation, and the credit card ban to me is another tool that I've got now that I know is there to prevent me getting completely stupid about it again."

Furthermore, people we interviewed noted that their spend on gambling was more apparent to them when it was coming out of their bank account, and it was clearer to them that they needed to leave money for everyday expenses. This led them to be more careful and to gamble less:

“Once it started coming out on the debit card, I noticed it – hold on a minute, you had that amount, now you've got that amount. You're not going to leave yourself any money left. Just need to stop and calm down.” – Person who gambles

Alternatives were to take on extra occasional work to get some cash for more betting, or to try to stop gambling altogether if some credit card debt had built up. In the case of people who had already reduced their gambling or stopped gambling with credit cards before the ban, the ban was felt to be helping them to maintain the desired change to their behaviour. Affected others also reported a reduction in the level of the person's gambling following the ban, with the end of the secrecy of credit card accounts for gambling mentioned as a factor, along with the naturally limiting feature of having to use debit accounts.

As noted earlier in the section on indirect use of credit cards for gambling, the ban did not always make a difference to the level of gambling. For example, when the person had existing problems with gambling and perhaps substantial credit card use before the ban, there was a feeling that it was easy simply to switch to paying for gambling with debit cards and loans while using credit cards of other expenses. This allowed people to continue gambling at the same level or even higher levels of gambling.

The topics of using borrowed money for gambling other than credit cards nowadays and how this changed following the ban are discussed in detail in chapter 5.

Intentions for gambling in the future

In the interviews with people who gamble, future intentions for gambling ranged from planning to gamble more, through continuing as presently (whether currently gambling or having previously stopped), to intending to reduce, take a break, or stop altogether. Plans to gamble more were associated with a forthcoming retirement, with sufficient funds and no children or other demands on funds, along with a history of being able to gamble without problems for entertainment, and no problem in giving up the use of credit cards for gambling.

Among those who intended to continue gambling as they are now, perspectives included: continuing to have very high debts and no immediate source of income to deal with these; having always gambled at a low and manageable rate and being content not to use credit cards; having reduced gambling already at around the time of the ban and the pandemic, possibly in combination with giving up credit cards as the ban came in and planning to continue gambling at a lower rate; or having reduced gambling because their enjoyment was dependent on having the use of credit cards, without getting into debt, which they were no longer able to do.

Among people who intended to reduce their gambling, there had been some moderate issues with credit card gambling before the ban and an existing intention to keep their gambling under control and not to use credit cards for gambling. The cost of living was also mentioned as a factor in the intention to reduce gambling.

Among people who had gambled and experienced problems with gambling and debt in the past and had stopped gambling altogether either shortly before the credit card ban, during its implementation or afterwards, there was an intention to continue staying away from gambling. The possibility of relapse was understood as a risk by one person who had gambled, whose high level of debt had worsened in the year following the ban, before he stopped:

“I'm obviously hoping I won't do. I'm doing everything to make sure I don't do but [...] my gambling, or my gambling debt will have an impact on me for at least 15, 20 years going

forward. So actually, it's impacted most of my adult life, then so far, and I think it's monumental.” – Person who gambles

The intention to stop gambling altogether was expressed in the context of a participant having reflected on his current gambling status during the interview process (reduced gambling following major debt from gambling with credit cards before the ban, which he was working through paying off).

4.3 Influence of the COVID-19 pandemic on gambling

The ban on the use of credit cards for gambling was introduced in Great Britain on 14 April 2020, three weeks after the announcement of a national lockdown during the COVID-19 pandemic. We therefore asked survey respondents and interview participants about their experiences during the pandemic generally, and also in relation to gambling with credit cards and borrowed money. We wanted to find out whether people's circumstances, including financial, had changed during the pandemic, whether their pattern of gambling had changed and if so, how much of this, if any, they attributed to the pandemic itself rather than the credit card ban.

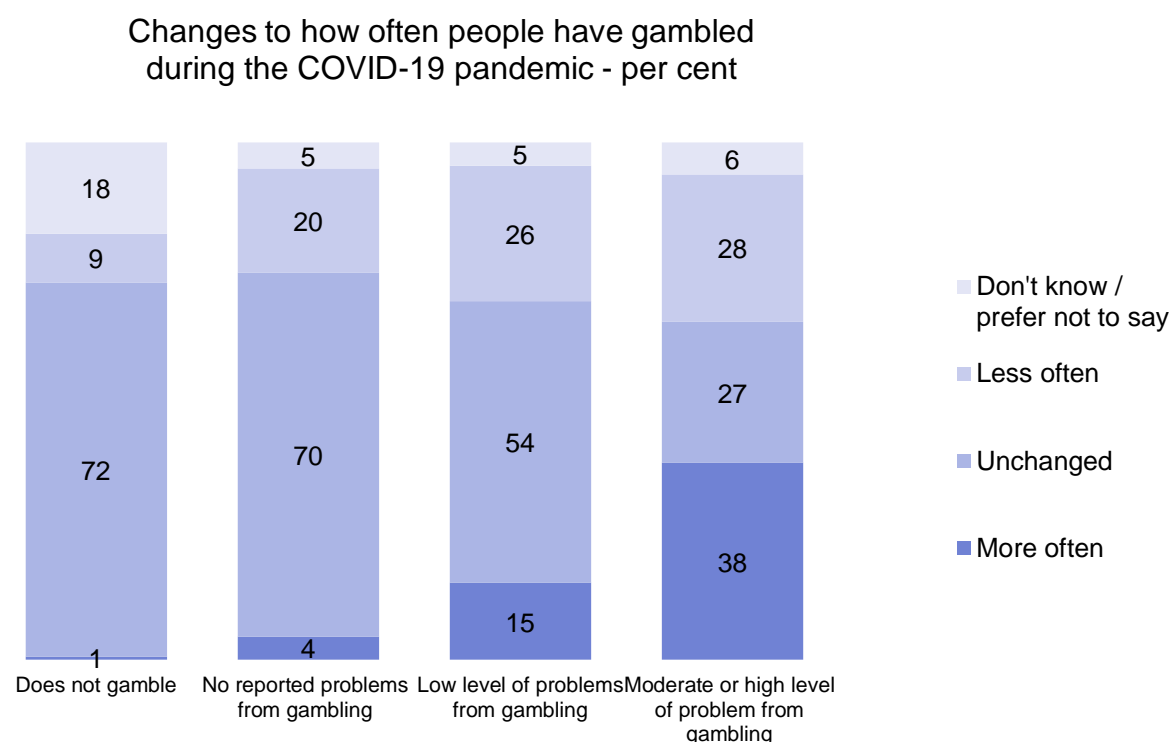
Changes to gambling during the COVID-19 pandemic

In the descriptive analysis of survey data in September and December 2021, 62% of those who had gambled in the past and had not stopped gambling altogether since the ban said that the frequency of their gambling was unchanged by comparison with before the COVID-19 pandemic, while 21% said they gambled less often than before the pandemic. The proportion of respondents who said they had gambled more often during the pandemic than before it was around one in ten (10%).

Analysing these statistics by demographic and social characteristics indicated that the frequency of gambling was more likely to remain unchanged compared with pre-pandemic levels among people aged 55+ (73%), while people in the youngest age group (18–34 years) were more likely compared with other age groups to say that they gambled more often (19% compared with 11% of 35–54-year-olds and four percent of those aged 55+). The change in frequency of gambling reported by people from an ethnic minority background was more marked than among those from a white ethnic background. Around one in five (19%) of people from an ethnic minority background said they gambled more often compared with pre-pandemic, while 34% said they gambled less often. Among people from white ethnic backgrounds who answered this question, nine percent said they gambled more often and 19% said they gambled less often.

The change in frequency of gambling compared with pre-pandemic levels was more pronounced among people who were experiencing a moderate or high level of problems from gambling than among people with other PGSI categorisations. **Nearly two-fifths (38%) of people experiencing a moderate or high level of problems from gambling said they gambled more often compared with before the pandemic**, 27% said their gambling frequency was unchanged, while 28% in these risk categories said they gambled less often. By contrast, four percent of people experiencing no reported problems from gambling and 15% of people experiencing a low level of problems from gambling said they gambled more often compared with pre-pandemic. See Figure 4.2 below.

Figure 4.2 Changes to how often people have gambled during the COVID-19 pandemic



Source: Gambling Commission online tracker survey, waves September and December 2021.
Base: People who had gambled in the past and had not stopped gambling since the ban (n=3262)

Interviews with people who gamble tended to echo these findings, with a spread of changes to the level of gambling during the pandemic (*COM-B: automatic motivation; TDF: emotion; COM-B: reflective motivation; TDF: beliefs about consequences; COM-B: physical opportunity; TDF: environmental context and resources*). In particular, the combination of existing debt and a high level of credit card use for gambling before the ban, combined with loss of income and more spare time, appeared to lead to gambling more, for example as the only way to make additional income. Other changes to the pattern of gambling during the pandemic were stopping altogether at around the time of the ban and the start of the pandemic, no change to gambling or a dip followed by a return to pre-pandemic gambling levels, and lastly, reducing the amount or frequency of gambling.

Furthermore, support providers noted that COVID-19 may itself have presented a confounding barrier when monitoring the true effectiveness of the ban given that its implementation coincided with the beginning of the pandemic. For example, one organisation experienced a particular decrease in the number of people who gamble seeking support during the pandemic, but this had since returned to normal levels. Additionally, support providers reported that online problem gambling increased during the pandemic owing to people being at home more. Therefore, it is difficult to attribute direct impact to the ban itself.

Reasons for changes to gambling behaviour during the pandemic

Among those who said they had gambled more often during the pandemic, over half (56%) stated that having more spare time was one reason for them gambling more. Other commonly reported reasons included: to manage their mood as a result of being in a pandemic (31%); more online gambling making it easier to gamble (23%) or harder to stop gambling (10%); gambling to increase their disposable income or to meet financial needs (22%); or gambling more because they had more disposable income available (16%).

Survey respondents experiencing a moderate or high level of problems from gambling were more likely than those experiencing no reported problems or a low level of problems from gambling to agree with all of the stated reasons for gambling more during the pandemic. **More spare time was a factor for 61% of respondents experiencing a moderate or high level of problems from gambling compared with 45% of people experiencing no reported problems from gambling, while 29% of people experiencing a moderate or high level of problems from gambling said they gambled to increase disposable income or meet financial needs, compared with 13% of people experiencing no reported problems from gambling. The availability of more online gambling was mentioned as making it easier to gamble by 28% of people experiencing a moderate or high level of reported problems from gambling, compared with 13% of people experiencing no reported problems from gambling, and harder to stop gambling by 16% and four percent among the respective PGSI categories.**

In interviews, themes that emerged among people who said they gambled more during the pandemic included: loss of income particularly when combined with more free time; boredom; more available income because of working from home combined with not going out to spend money during lockdown; and more generally a feeling that the pandemic had negatively impacted on their gambling and debts, which worsened during that period. In the words of one person who doubled his gambling-related debt from online gambling during the pandemic, before stopping altogether, the impact was negative:

“[I]n terms of me gambling and spending more and in terms of being drawn into that cycle of loss-losing and all the adverts and promotions from the companies, etc., trying to encourage you to deposit more, etc., and things.” – Person who gambles

Where gambling reduced during the pandemic, this was strongly linked in people's view to the cancellation of sports in the early months, including football, racing, and Formula 1. Among those who enjoyed the skill and the excitement of betting on sports over the period of a race or match, although online slots, e-sports, poker, and other games were tried, these were not as interesting or were too quick in terms of wins and losses, and so overall betting was reduced. There were reports of gambling levels reverting to pre-pandemic patterns once sport started up again, but also of a lasting reduction and change in behaviour:

“I'd say probably not like a major reduction, but it's had an impact I think. It's led to me probably gambling on the horse racing less now than I did before, even if not to a huge extent.” – Person who gambles

Another key theme related to reducing gambling during the pandemic was people's financial situation. Those who were on furlough, people suffering loss of income because of lockdown, or those with uncertainty about their finances spoke about reducing their gambling for financial reasons even where their preferred games were still available, such as online slots. Among people with gambling-related debt at the start of the pandemic, COVID-19 appeared as an opportunity or a catalyst to reduce gambling or stop it altogether. This could also be combined with a change in circumstance such as moving to a new house, having more limited time on one's own, or even poorer internet connection while living with relatives.

For people whose gambling was unchanged, financial concerns and a wish to make up for lost income could still be a draw to gamble more, though this was resisted because of the awareness that there would be losses and a reluctance to put their family under financial strain. The hope of winning was also mentioned as a primary reason for continuing to gamble at the same rate, with the pandemic not felt to have affected anything, where there had been no other changes to circumstances.

People affected by others' gambling noted a loss of income and activity in the person who gambles during the first month of the pandemic, whether because of furlough or generally because of lockdown. One outcome of this was an exacerbation of the person's gambling owing to boredom, having too much time on their hands, or loss of purpose and self-esteem while furloughed. Another aspect of the pandemic noted by affected people was that the person who gambles reduced their gambling owing to sports events being cancelled, however there was also a view that people had turned to online gambling which all continued throughout the pandemic. People affected by others' gambling also noted the impact of betting shops being closed during lockdown on the gambling behaviours where people preferred to bet in person.

There were a range of views among people affected by others' gambling about what would have happened during the pandemic if there had been no credit card ban. One was that the level of gambling would have doubled or tripled as people were bored and had taken to gambling online, or would have increased their gambling if they already had issues. Another view was that as there was not much to gamble on during the lockdown the credit card ban did not make a great difference. One view was that circumstances would have been difficult without the ban as the person would be likely to have continued using a credit card despite their reduced income during the pandemic.

Impact of the pandemic on likelihood of using borrowed money for gambling

Among those who had gambled in the past and had not stopped gambling altogether since the ban, **four percent said that the COVID-19 pandemic itself (and how it had affected them) had made them more likely to borrow money to gamble with during the pandemic.** For the majority of respondents (75%), the pandemic and its impact on them had not changed how likely they were to borrow money for gambling, while for 17% of respondents the pandemic had made it less likely that they would borrow money for gambling.

Just over one in five (22%) of people experiencing a moderate or high level of problems from gambling said they were more likely to borrow money to gamble because of the pandemic (and how it had affected them), while 45% in this group were neither more nor less likely to borrow money, and 30% were less likely to borrow money. Compared with respondents experiencing a low level of, or no reported problems from gambling and people who do not gamble, respondents experiencing a moderate or high level of problems from gambling reported that they were more likely to change their gambling behaviours in relation to borrowing money.

These findings were reflected in the interviews with people who gamble. Among people who were gambling at a very high level with large debts at the start of the pandemic, potentially accompanied by a severe loss of income as a result of the national lockdown, there were reports that gambling with borrowed money increased during the pandemic. This was explained by a need to make more money while earning less, boredom and a need for distraction, more spare time, and feeling that the individual had an addiction. The illogicality of gambling to try to make money was noted by one person who had gambled mostly with credit cards before the ban:

"I started gambling a bit more because I had more free time on my hands and less money. Sounds silly, you should gamble less but you do it more because you have no money [...] post-pandemic I still gamble more now. [I thought gambling] would help get some money back that I was losing out on not working." – Person who gambles

4.4 Theory of change and chapter findings

Table 4.2 below maps findings on changes to gambling and gambling behaviour since the ban to elements in the ToC. Where possible both quantitative and qualitative findings are included, but in some cases, as mapped out in the Scoping Report for this evaluation, no quantitative data was available to support the specific outcomes or assumptions in the ToC.

Table 4.2 Summary of evidence in relation to the ToC

Theory of change component	Findings from online tracker survey	Findings from qualitative interviews with organisational stakeholders, people who gamble and affected others
Outcomes		
Increased 'friction' resulting in a 'pause' in gambling, greater self-reflection and changed patterns in gambling.	<ul style="list-style-type: none"> From the survey modules it emerged that among those who had ever gambled, 14% had stopped gambling since the implementation of the ban. There were no statistically significant differences in the proportion of people gambling with borrowed money before and after the ban. In adjusted logistic regression models among all people who gamble, there was a statistically significant lower likelihood of using a credit card to gamble with post-ban compared with pre-ban (AOR 0.82*). <ul style="list-style-type: none"> However, among those respondents classified as moderate / high risk gamblers there was a 1.36 times higher likelihood of gambling with a credit card post-ban compared with pre-ban. In the adjusted model, similarly, those classified as low-risk or non-problem gamblers were less likely to gamble with a credit card following the ban (AOR 0.29*** and AOR 0.43*** respectively). 	<p>Varying responses to the ban emerged from the interviews with people who had gambled with credit cards.</p> <ul style="list-style-type: none"> Participants who reported knowing about the ban prepared by either stopping using credit cards in advance or continuing to use credit cards until this was no longer allowed. (COM-B: Capability, psychological; TDF: Knowledge). They reported accepting the ban and adjusting to the new circumstances in accordance with their preferences (COM-B: Motivation, reflective; TDF: Intentions). Among those who were not aware of the ban and discovered about it when prevented from gambling with a credit card, some quickly accepted the change and adjusted by changing payment method (COM-B: Capability, psychological; TDF: Memory, attention and decision processes). Others experienced confusion and concern about possible credit card issues which led them to try multiple gambling websites before finding out about the ban (COM-B: Motivation, automatic; TDF: Emotion). People who gamble reported switching from credit cards to debit cards and digital wallets as their main method of payment for gambling. (COM-B: Opportunity, Physical; TDF: Environmental context and resources; also, COM-B: Capability, psychological; TDF: Memory, attention and decision processes). People affected by gambling reported taking advantage of the ban to encourage further changes in how people who gamble administer their money (such as, suggesting moving away from credit cards and taking control of their finances). People who had gambled with credit cards and people affected by gambling reported different feelings about not being able to use credit cards for gambling: <ul style="list-style-type: none"> Some expressed positive feelings (e.g., reduction in stress, and happiness from knowing that it was no longer possible to accrue debt by using credit for gambling); Others similarly expressed positive feelings and welcomed the ban, but also reported feelings of envy and regret that the ban had not been introduced earlier, before they had built up credit card debt from gambling; Other participants reported annoyance, anger, and frustration, particularly immediately following the ban. For some people who had gambled with credit cards, the ban was an opportunity to reflect on their gambling behaviour and to change it (e.g., reducing the number of gambling accounts, reviewing their finances, budgeting, and gambling less) (COM-B: Motivation, reflective; TDF: Goals). People who had gambled with credit cards expressed a wide range of intentions for gambling in the future, from gambling more (because this was still within their capacity), to continuing gambling as they are now (e.g., to repay an existing gambling debt or because their gambling is within their possibilities), to reducing gambling or stopping altogether (COM-B: Motivation, reflective; TDF: Goals; Intentions).
Increased friction in gambling reduces relapse among those recovering from gambling-related harms.	<ul style="list-style-type: none"> No quantitative data available for this outcome. 	<ul style="list-style-type: none"> Among people who had experienced problems with gambling and gambling-related debt in the past and had stopped gambling altogether, there was an expressed intention to continue staying away from gambling, and a feeling of security from knowing that the ban was in place, though there was an awareness of the risk of relapse.

A reduction of credit and other borrowed money use by people who gamble and are at risk of debt.

- As noted above, there were no statistically significant differences in the proportion of people gambling with borrowed money before and after the ban. In adjusted logistic regression models, among all people who gamble there was a statistically significant lower likelihood of using a credit card to gamble with post-ban compared with pre-ban (AOR 0.82*).
- However, among those respondents classified as moderate / high risk gamblers there was a 1.36 times higher likelihood of gambling with a credit card post-ban compared with pre-ban.

- Among people who had reduced their gambling following an experience of major debt, an intention to consider stopping altogether was reported.

- From interviews with people who gamble, their spend on gambling after the ban was more apparent to them when it was coming out of their bank account compared with using a credit card before the ban; and it was clearer to them that they needed to leave money for everyday expenses. This led them to be more careful and to gamble less or even try to stop gambling altogether.
- Among people negatively affected by others' gambling, awareness of the ban helped them encourage and reinforce the move away from credit card use, through informing the person who gambles about the ban, or taking control of finances and cutting up credit cards so they could not be used for cash withdrawal as a way to get around the ban.
- From the interviews, when the person had existing problems with gambling and substantial credit card use before the ban, there was a feeling that it was easy simply to switch to paying for gambling with debit cards and loans while using credit cards of other expenses. This allowed people to continue gambling at the same level or even higher levels of gambling.

Assumptions

People who gamble don't make a large credit card deposit prior to ban introduction.

- No quantitative data available for this assumption.

- From interviews with people who gamble, moving money from a credit card to a current account was another behaviour change evident in the weeks preceding the ban's implementation. People who gamble also deposited money from their credit card to their gambling accounts to ensure they had enough money to gamble once the ban came into effect. However, others decided against transferring money from their credit card to their current or gambling account due to concerns around having to pay it back or there being further incentive to gamble.

People who gamble don't bypass the ban, by withdrawing cash with a credit card instead, layering funds through wallets or using pay-later phone billing methods.

- Among people who gamble who said they used credit cards for gambling post-ban, in the March 2021 and June 2021 survey waves, 51% said they had used a credit card indirectly to pay for gambling.

- After the ban, people who gamble expressed different views about the indirect use of credit cards:
 - Some were not aware of how to divert funds from a credit card to other payment methods for gambling (**COM-B: Capability, psychological; TDF: Knowledge**).
 - Those who were aware of how to divert funds but were not indirectly using a credit card for gambling described different reasons for their decision, such as the cost of making cash withdrawals and the negative connotations of looking for such alternatives (**COM-B: Motivation, reflective; TDF: Beliefs about consequences**).
 - Conversely, among people who had reduced their gambling or gambled at a moderate level without debt some reported using credit cards to pay for goods and services not related to gambling.
 - As noted above, among people who had existing problems with gambling and credit card debt, there were reports of switching their expenditure by using debit cards to continue gambling and using credit cards for everyday living expenses.

Inconvenience to people who gamble for leisure, without experiencing problems, is minimised

- No quantitative data available for this assumption.

- When the ban was implemented, people were prevented from using their credit cards on gambling websites and apps, their immediate response to the ban was easy acceptance and adjustment. For people who were gambling frequently and had not been aware of the ban, the immediate response was confusion about

whether their credit card limit had been reached or their card was faulty, and eventually learning about the ban
(COM-B: capability; TDF: knowledge; memory, attention and decision process)

– Negative feelings about the ban were reported in the context of people who gambled moderately using their knowledge of sports to remain in control, or for whom using a credit card for gambling was a cheaper way to gamble a bit more on key events, knowing that they would pay off their credit card balance. The credit card ban for this type of gambling was felt to be inconvenient. It removed the possibility of gambling larger sums when regular income was tight, and also meant that the benefit of the interest free loan was no longer available.

5. Impact on gambling-related harms

This chapter discusses whether the ban had an impact on gambling-related harms such as debt creation or reduction, and on the likelihood of engaging in risky forms of borrowing to pay for gambling. Beyond financial harms, wider gambling-related harms were also explored, such as the impact on relationships, wellbeing, and employment. Lastly, there is some discussion of the awareness, take up and experience of safer gambling tools, and of accessing support or advice.

Summary of key findings



60% of respondents who were aware of the ban and had gambled before reported that their borrowing had not changed since the credit card ban was introduced. Reasons for this were as a result of having more disposable income during the COVID-19 pandemic or receiving financial support from family.



Among those who had gambled with borrowed money since the ban, the most common ways to borrow money, excluding a credit card, were: family and friends (5%), overdraft facility (4%), other loans (3%), and payday loans (2%). Those who borrowed money did so because they felt it was easy to switch payment method or were not fearful of the consequences because they felt they were in control of their spending.



In the interviews with people who gamble, there was a consistent view to avoid illegal forms of borrowing to pay for gambling both before and after the ban. People were also less likely to gamble using payday loans given the high interest rates and possibility of owing more money than could easily be paid back.



Awareness of credit related gambling harms was associated with more responsible play. People who gamble felt the credit card ban encouraged them to take steps to start paying back their credit card debt in regular instalments, using tools such as GAMSTOP.

Evaluation objectives addressed in Chapter 5

- Examine the extent to which credit card users changed their gambling behaviours as a result of the ban.
 - Relates to ToC outcomes:
 - Increased friction reduces relapses amongst those recovering from gambling related harms;
 - There is a reduction in credit and other forms of borrowed monies used by ‘debt-risk gamblers’; and
 - The ban adds impetus to the practice and perceptions of safer gambling support by operators.
- Understand the impact the ban has had on gambling-related financial harms experienced by people who gamble with borrowed money.
 - Relates to ToC outcomes:
 - There is a reduction in gambling-related debt resulting in bankruptcy;
 - There is a reduction in gambling-related credit card fraud; and
 - Increased awareness of credit-related gambling harms results in more responsible play and an increased uptake of safer gambling tools / self-exclusion.
- Determine the degree to which the ban has been implemented as intended.
 - Relates to ToC outcome:
 - The ban adds impetus to the practice and perceptions of safer gambling support by operators.

5.1 Financial related harms

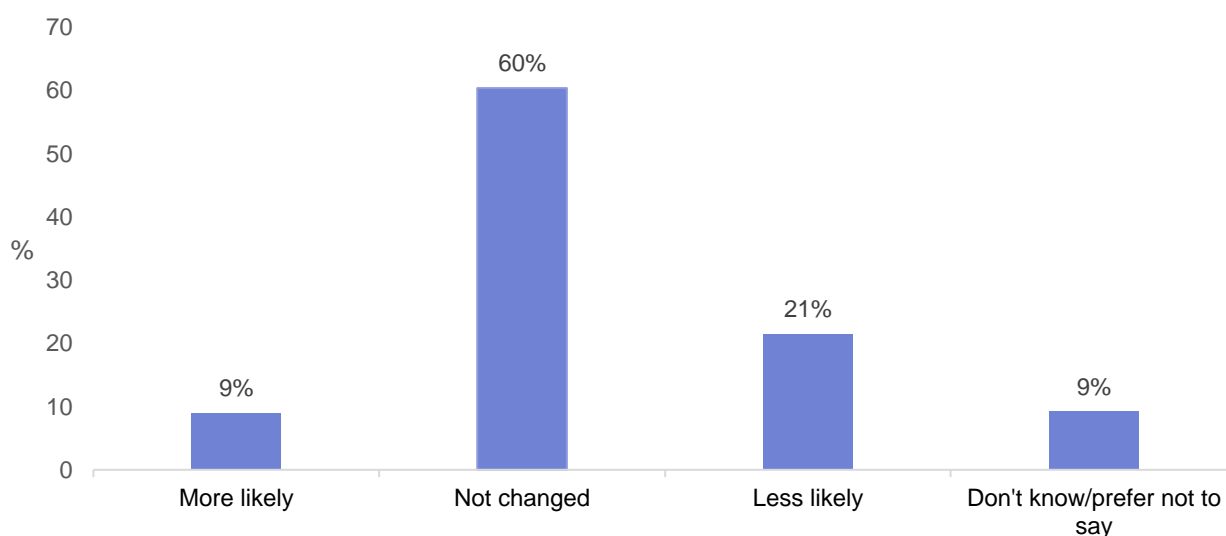
Debt

Creation of debt

In the September 2021 and December 2021 waves, respondents who had ever gambled in the past and were aware of the ban were asked whether the ban on using credit cards to pay when gambling had made them more or less likely to borrow more money than they were easily able to pay back. This question was asked to identify whether there was a reduction in gambling-related debt following the ban.

Among respondents aware of the ban and who had ever gambled, over half (60%) reported that their borrowing had not changed since the credit card ban was introduced compared with 21% who reported that the ban made them less likely to borrow more money and nine percent who reported they were more likely to borrow money, as shown in Figure 5.1 below.

Figure 5.1 Proportion of respondents more or less likely to borrow more money than they could easily pay back since the ban

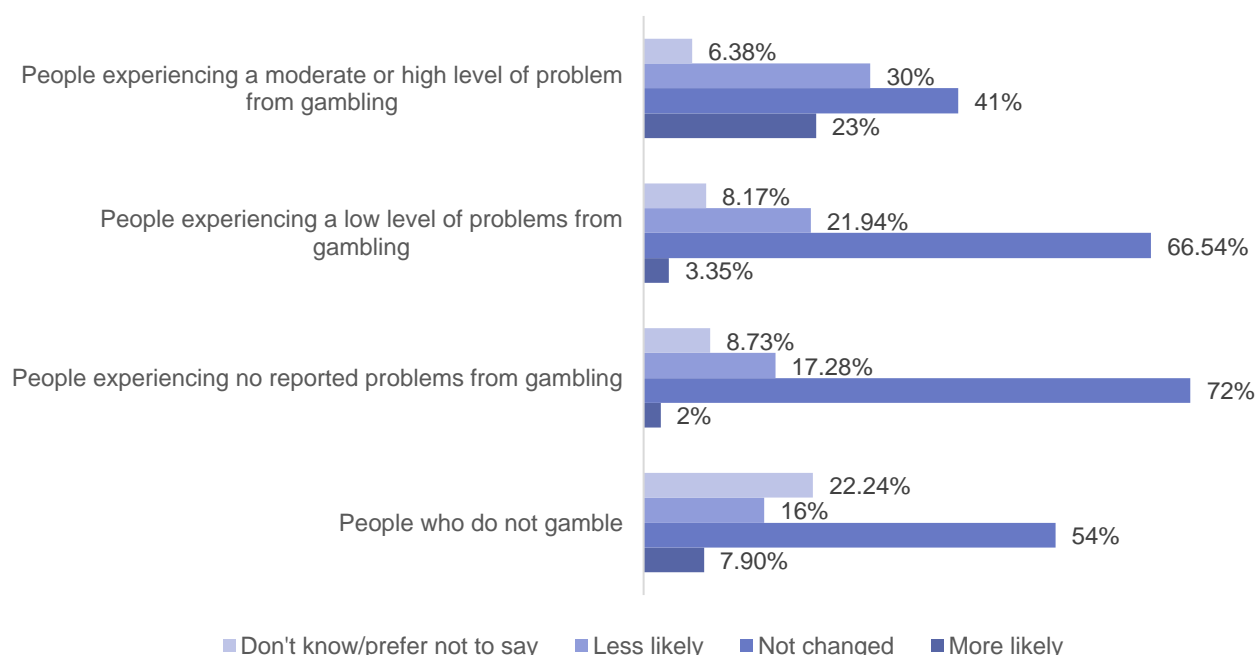


Source: Gambling Commission online tracker survey, waves September and December 2021.

Base: Among respondents aware of the ban and who had ever gambled (n=974).

When we consider the likelihood of borrowing more money than could easily be paid back across PGSI categories, **72% of people experiencing no reported problems from gambling reported that they had not changed their behaviour post-ban compared with 17% who were less likely to borrow money, and two per cent who were more likely to borrow money.** People experiencing no reported problems from gambling had the highest proportion of individuals who reported that their gambling behaviour had not changed, as shown in Figure 5.2. In contrast, **41% of those experiencing a moderate or high level of problems from gambling had not changed how likely they were to borrow money, 30% were less likely to borrow money, and 23% were more likely to borrow money for gambling that could not be easily paid back.** Those experiencing a moderate or high level of problems from gambling had the highest proportion of those reporting they were less likely to borrow more money than they could easily pay back. People experiencing a moderate or high level of problems from gambling also had the highest proportion of those who were more likely to borrow more money than they could easily pay back.

Figure 5.2 Proportion of respondents more or less likely to borrow more money than they could easily pay back since the ban, across PGSI categories



Source: Gambling Commission online tracker survey, waves September and December 2021.

Base: Among respondents aware of the ban and who had ever gambled (n=974).

A similar picture emerged from interviews with people who gamble and affected others, where there was some variety in the level of debt incurred since the ban. People who gamble discussed different reasons behind these changes post-ban, which were summarised and organised using the TDF and COM-B components below:

Motivation to reduce gambling debt

(COM-B: *psychological capability*; TDF: *behavioural regulation*; COM-B: *reflective motivation*; TDF: *beliefs about capabilities/ goals*)

After the credit card ban was implemented there were differences in whether people felt the need to take steps to reduce their credit card debt. Some of the steps taken included setting strict budgets for gambling, self-monitoring of expenses, setting goals, and seeking support. People who gamble felt more inclined to start monitoring how they were spending on gambling given they had switched to using their own money to pay for gambling, through the use of a debit card. Prior to the ban, some felt that it was not necessary for them to monitor their spending or take steps to pay back debt because gambling with a credit card did not feel as though they were spending real money and often had large credit limits that were difficult to reach.

"I'd say it's reduced [the debt], basically. I do keep a regular check on credit. I'm signed up to several credit-report websites, so I'd say the situation has improved in the last couple of years." – Person who gambles

Others hoped the credit card ban would help them continue to reduce their gambling debt in order to attain personal goals. While reducing their debt was a primary goal, people who had built up gambling debt were also motivated by the possibility of having more disposable income, a better credit history, and improved financial security. In some instances, people who gambled with large amounts of credit card debt had already started

making regular re-payments to the credit card companies prior to the ban. For these people, it was felt that the ban enabled them to continue to reduce their debts by removing an option and ensuring they could not gamble with a credit card again in the future should they want to.

“We would like to go get a bigger house and move out, and for me to get a mortgage, but due to my credit history I can't do that. Due to paying my debt back, I can't really save any money towards a deposit. That's a really significant burden at the moment in that it's sort of putting my life on pause to a certain degree... I think I've roughly worked out that by September 2024 on my current repayment, I'll be debt free.” – Person who gambles

“I've had to cut back quite a lot and I try now not to use credit at all, so I'm just trying to pay it off. Yes, I would say it helped because I simply couldn't use a credit card to pay.” – Person who gambles

Furthermore, among those who felt their gambling was out of control before the ban, the ban was thought to help them realise that they had lost control and encouraged people who gamble to seek further support where they did not feel capable of reducing their debt on their own. Support to pay back debt was often sought directly from banks or Citizens Advice who provided people who gamble with free money advice or repayment plans. These re-payment methods were sometimes preferred because of how easy they were to set-up, how manageable it made paying off debt feel, and how understanding the support providers were.

“When I was using my credit card, I went over the limit. Then my card got declined as well. I called the bank that time. They said because I went over the limit, so they're not going to issue me anymore. They said, 'Before we go further, you need to somehow pay this as well.' As long as I keep up with my payment, I'm okay. They said, 'Make sure you keep up with your payment. You can pay what you like anyway.' I made agreement with them. [The credit card ban] stops me using it [a credit card] now. I'm not having a credit card now because I learnt my lesson, and I'm paying the price for that as well.” – Person who gambles

“Well, my cards were maxed out at one point because of gambling. I did a payment schedule to get me back under control. I was spending more than what I were earning. I took advice from the CAB, Citizens Advice Bureau over the telephone for a couple of months. They were the ones who helped me do the payment schedule.” – Person who gambles

Interviews with people who gamble who had successfully stopped gambling following the ban and started paying off their debt, cited a combination of the ban alongside the use of safer gambling tools as the most effective way to reduce debt over a short period time.

“I am now paying back monthly in installments which is manageable. I feel quite pleased with myself that I've managed to bring that debt down quite dramatically in a reasonably short period of time, and have either prevented or been prevented, between the credit card ban and GAMSTOP, from building it back up again.” – Person who gambles

In one case, one person who gambles felt they were unable to pay back all their debt and decided it was easier to declare bankruptcy. This was following several attempts to take out loans to pay off the credit card debt and then taking out additional loans to pay off the loans.

Interviews with organisational stakeholders support the idea that there has been a slight reduction in the creation of credit card debt since the introduction of the ban. However, a concern is that the ban has instead encouraged the creation of debt through other methods of payments for gambling, such as loans, overdraft, or using a credit card for daily expenses to free up wages.

Influence of previous experience with debt

(COM-B: psychological capability; TDF: memory, attention and decision processes)

Some people who gamble noted that the ban did not influence their ability to manage or reduce their current debt. One reason for this was that those who had built up severe credit card debt prior to the ban had experienced memorable and traumatic consequences, such as a bad credit score or resorting to selling personal items to pay off debt. Having experienced this before, some people who gamble felt positive that they were in control of their spending on gambling around the time of the ban and had been for a while in order to avoid being in a bad position again.

“In the past using a credit card had an impact on me as I maxed out my credit cards and had to give up things (i.e., luxury items). It only hit me when I had – my monthly costs, they were like triple of what they normally had been and I literally had to sell my car. It was a nightmare situation and I never want to be in that position again.” – Person who gambles

External influences on debt

(COM-B: physical opportunity; TDF: environmental context and resources; COM-B: social opportunity; TDF: social influences; COM-B: reflective motivation; TDF: beliefs about consequences)

People who gamble and their ability to continue to build or reduce gambling debt was often attributed to the influence of the COVID-19 pandemic on personal circumstances. For example, some people who gamble were furloughed throughout the COVID-19 pandemic and found themselves with more disposable income as a result of the closure of almost everything, including betting shops. As a result, some people who gamble found they were able to pay off large portions of their credit card debt and start saving given that they were not spending as much as they typically would on gambling.

“During lockdown, because our expenses went down, we had more disposable money to pay back the credit card balance. Overall our finances have improved.” – Person who gambles

Among people affected by the gambling of others, one participant detailed how their friend had more disposable income during the pandemic because they were furloughed and spent it all on gambling. This placed a lot of pressure on the person who gambles to spend more money on gambling until they had won back the original money spent. In this instance, they explained that they were able to gamble as much as they wanted given the accessibility of online websites and apps at a time when physical betting shops were closed.

Alternatively, some felt a strain on their finances as a result of the COVID-19 pandemic. Around the time the ban was introduced, some had lost their jobs, had less work than usual, or relied on a government funded furlough scheme to cover core costs. This often meant that by the time the ban was introduced, there was no additional influence felt by people who gamble who had little disposable income and were already spending less overall to ensure they could pay for essentials like food and bills.

“The credit card hasn't made any difference. Main difference is post-pandemic, less work around and prices have gone up – things are worse financially, but I don't put that down to a

credit card ban at all. In this situation it hasn't made any difference at all.” – Person who gambles

People who had gambled heavily in the past reported consulting their own family and friends for advice regarding their gambling debt, placing a larger emphasis on this than the credit card ban. This was largely due to the fact that they were trusted individuals who had been helpful at dealing with their debts in the past and had been known to intervene before the problem got out of control for the person who gambles.

“I nearly went and sought counselling my debt, but I didn't in the end. My mum and my brother-in-law are quite good soundboards for whenever I'm having a moment of struggle, so I tend to use them rather than having gone to a professional counsellor.” – Person who gambles

Alternatively, some preferred to put their trust in a single point of contact who was a professional and far removed from their daily life, in order to decide how to best tackle their gambling debt. This was often the case where people who gamble felt embarrassed and did not want to repeatedly share the details of how they accumulated their debt by gambling with lots of different people.

“I have spoken to my bank, and also, I didn't want to speak to too many people as well, because it's going to be repeating myself over and over and over. It's like I'm having a counselling with a different person, to different person. It was going to, if I will speak to more people, more people, it will make me feel more like down, down, down, depressed. I'd rather speak to the bank, who I can trust because I know my information with the bank is not going to be leaked out to another person.” – Person who gambles

In the interviews, one reason for not addressing gambling debt following the ban was due to a fear of the consequences associated with admitting that gambling was the cause of their financial problems. In some cases, this fear prevented people who gamble from seeking support to make re-payments given the perceived impact on areas of their life such as child custody.

“He [the solicitor] advised me not to go and get antidepressants, he said because that can be used against me in a court of law to be deemed as not suitable as a father. Based on that, the last thing I want to do is start looking for any kind of extra debt advice, because I'm so paranoid now that anything and everything could be held against me in that regard. Other than the trip to Citizens Advice, that's it. There's no way I would get any other help, purely out of fear. Not because I don't want to, because I'm too frightened to.” – Person who gambles

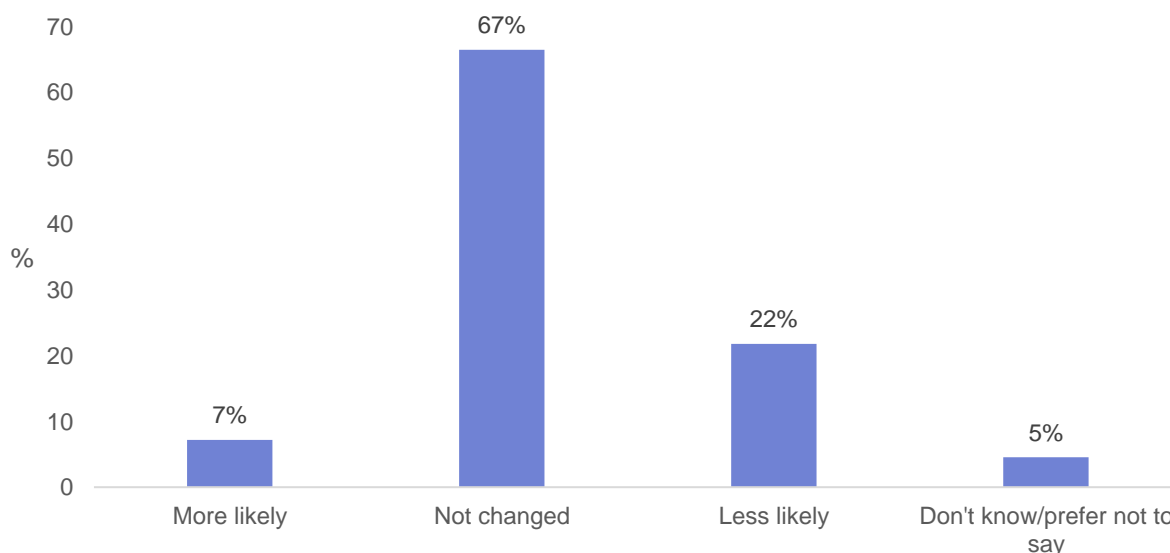
Use of borrowed money

Chapter 4 provides detailed analyses of changes to borrowing behaviour since the introduction of the ban and notes that while any changes were not statistically significant, after controlling for various sociodemographic characteristics, people experiencing a low level of, or no reported problems from gambling had a lower likelihood of using borrowed money to gamble post-ban compared with pre-ban.

Those who continued to borrow money were asked whether the credit card ban had made them more or less likely to use borrowed money, other than a credit card, to gamble with since the introduction of the ban (Figure 5.3). The majority (67%) of respondents reported no change in how likely they were to use other forms of borrowed money compared with 22% who reported being less likely to borrow money and seven percent of

respondents were more likely. Among those who had gambled since the ban, the most common ways to borrow money, excluding a credit card, were: family and friends (5%), overdraft facility (4%), other loans (3%) and payday loans (2%).

Figure 5.3 Proportion of people who gamble more or less likely to borrow money for gambling since the ban



Source: Gambling Commission online tracker survey, waves September and December 2021.

Base: Among those aware of the ban and still using borrowed money to gamble post-ban (n=739)

Respondents who had borrowed money for gambling in the last 12 months were asked whether they were also more likely to stop gambling altogether rather than continue to borrow money to gamble with, since the introduction of the ban. Of those who had reported that they would consider stopping altogether, 39% expressed that this was because they were more aware of the risk associated with gambling with borrowed money post-ban. In the interviews, people who had stopped gambling with borrowed money since the ban reported that lying to family about what the borrowed money was for, high interest rates, having a low credit score, and incurring debt were specific reasons for no longer borrowing money.

“I just completely reduced and completely stopped altogether, since I couldn't use the credit cards. Then also because I looked at the cost of loans and it would've cost me too much so I would not get the loan.” – Person who gambles

Other ways in which the ban impacted whether people borrowed money to pay for gambling since the ban are summarised and organised using the TDF and COM-B components below:

Intention to borrow money

(COM-B: reflective motivation; TDF: beliefs about consequences/ beliefs about capabilities)

In the interviews, it emerged that there was a mixture of people who had borrowed money for gambling, including those who had only done so once, and those who would never borrow money. Those who did borrow money for gambling often cited using bank loans, overdraft facilities, and borrowing from friends and family.

Some people who gamble continued to borrow money for gambling following the ban because they felt it was easy for them to do so. Some described how they were easily able to switch their preferred method of payment

for gambling from a credit card to their overdraft when the ban was introduced. Use of an overdraft facility was commonly reported among those who borrowed money for gambling because it did not cost them anything to set up or use.

“I’m just borrowing in a different way. I’m using my overdraft facility as opposed to my credit facility for gambling. Then I’ve swapped around, where I would normally use my debit card for food shopping and whatnot, I’m now using the credit card instead.” – Person who gambles

One gambling operator agreed that it was “*incredibly easy to get hold of a personal loan*” and that once the loan was in the hands of the person who gambles, it could be transferred onto a debit card and spent on whatever they wanted, without the bank knowing.

Others preferred to borrow money from loans. This was particularly the case where people who gamble felt they could afford to pay back what was owed and perceived the loan to be “good debt”. There was a feeling that those who previously used a credit card to gamble were able to bypass the effects of the ban by using loans to cover the cost of their living expenses and spend their remaining wages on gambling. The interviews emphasised the ease of obtaining a loan, although people who gamble did not always feel they could disclose to the bank the true reason behind taking out a loan, and often would lie when asked what the money would be spent on.

“I’ve used money from a loan – which I knew that I could afford to pay back...I think there’s something called good debt, and there’s something called bad debt, and I think taking out a loan, as long as you’re using that money responsibly, I don’t think there’s anything wrong with that at all. It can help you.” – Person who gambles

Some people had never borrowed money to gamble with and the introduction of the ban did not change this. People who gamble expressed not wanting to borrow money for gambling at all as they knew they had enough of their own money that they could use instead. Others were deterred from using loans to pay for gambling given the consequences associated with borrowing. For example, high interest rates, building debt, lying to family, losing money, and depression. In most cases, an awareness of these negative consequences, whether personally experienced or not, was enough to dissuade people who gamble from borrowing money to gamble in the future.

“I don’t like owing money to family and friends, I don’t like doing that. I wouldn’t have got a loan out just to pay for gambling because then I’d have just got myself in trouble. Nothing stops me from doing it, but I wouldn’t, I just wouldn’t do it. I’d just get myself in debt. I’d start owing family and friends money, and I don’t like that. Just no.” – Person who gambles

“If I did borrow the money, and I’d have to pay it back. It would have affected me because I’d be putting myself into debt. I know one day, I’ll have to pay it back. If I don’t, I will get letters, letters, and that’s going to make me depressed, it will affect me.” – Person who gambles

Awareness of the consequences of gambling with borrowed money

(COM-B: *reflective motivation*; TDF: *beliefs about consequences/ social or professional role and identity*; COM-B: *physical opportunity*; TDF: *environmental context and resources*)

Of those who had never borrowed money for gambling, some reported that they would continue to avoid gambling with borrowed money following the ban because borrowing money involved acting in ways that was not in line with their character. For example, participants felt they had to lie to banks or friends and family about what the money was for in order to obtain these funds for gambling and did not enjoy having to do so.

"It would be easy [to borrow money from friends and family], but I wouldn't tell them what it's for, I'd just say it's something else. Then that's, for me, then I'm lying to people and I don't want to do that." – Person who gambles

In one case, one person who gambles was fearful of the impact paying for gambling with borrowed money would have on their relationships with friends and family. Where they borrowed money from their friends and family in the past, there was a desire to prevent inflicting financial strain or losing the trust of those closest to them. Since the ban, they continued to borrow small amounts of money but this was only to supplement their wages and they did not put this towards gambling. Interviews with people affected by someone else's gambling suggested that family members even tried to lend money in cash form rather than through a bank transfer, in order to prevent the money going towards online gambling.

"If I was to break that trust, I think I would probably lose my family, potentially. Potentially my girlfriend. There are certainly high stakes at play if I was to lose control of it again." – Person who gambles

A small number of people who gamble felt the introduction of the ban would not stop them from using borrowed money to pay for gambling. One reason for this was not fearing the current consequences for borrowing money other than a credit card. For example, there is no fee for using an overdraft to pay from gambling online.

"[...] actually spending money from your overdraft, I don't think there's anything to stop you really. Not that I've noticed...I would say only if they put a charge on it. That would stop me. If they knew it was for a gambling purchase, perhaps they might add a fee to it or more interest to try and put people off." – Person who gambles

Circumstantial influences on use of borrowed money

(COM-B: *physical opportunity*; TDF: *environmental context and resources*)

Borrowing money for gambling since the introduction of the ban was also dependent on whether there had been any recent changes to a person's personal circumstances at the time of the interview. In some cases, borrowing less was directly linked to earning less money during the pandemic due to unemployment or a loss in the household, not being able to afford loan re-payments, and having a low credit score.

"To get the first loan was easy, but then credit score became worse as not making repayments in the end, so difficult and then impossible to get credit. That's partly what led them to stop gambling completely, because he didn't have the funds." – Affected other

“Since I lost mum, my income has reduced, so I’ve realised I’ve had to cut back on lots of things, so I’d say that’s the only reason it’s reduced.” – Person who gambles

People who gamble who had previously paid for gambling with their credit card sought an alternative source of payment following the ban. People who gamble noted that taking out loans meant that over time people would be paying back more than was borrowed in the first place. Knowing the high cost of borrowing, this encouraged some people who gamble to reduce their borrowing or stop altogether.

“Since the ban was put in place, I just completely reduced and completely stopped altogether, since I couldn’t use the credit cards. Then also because I looked at the cost of loans and it would’ve cost me too much so I would not get the loan. I just stopped altogether to use any credit facility.” – Person who gambles

The interview case note below illustrates the views about the credit card ban from a long-term low-risk person who gamble who had previously used credit cards for gambling without getting into debt.

Interview case note 2: Person experiencing a low level of problems from gambling

Gambling status and history: P2 used to gamble only with a credit card for several years and quit some years before the ban. P2 gambled every month primarily on their own. They felt that if they had continued to gamble with a credit card it would have led to financial consequences.

Changes to behaviour following the ban: No changes in gambling behaviour were reported given that they stopped gambling with a credit card years before the ban. They noted that they intended to continue not to use a credit card for gambling following the ban as they would rather use their own money and would not want to incur charges.

View on the usefulness of the ban: P2 felt the ban was very effective in preventing people from experiencing problem gambling because it would have limited the amount of money people had access to and may even put them in a position of more self-control. They were unable to think of anything else that could have been more effective.

“I can definitely see that the ban would limit people’s access to additional funds to gamble...so they’re restricted to funds that they already have, that they’re gambling with their own money...they’d be more likely to take a bit more care.”

Risky forms of borrowing money

Risky forms of borrowing refer to borrowing money from sources which are often associated with a higher risk of experiencing negative consequences. To explore whether there was a significant difference in the likelihood of using riskier forms of borrowing, we assessed the use of payday loans to pay for gambling following the ban, selected as an example of risky borrowing because of the high cost of these loans.

Preliminary analysis of survey data from the March 2020 and March 2021 waves showed no significant difference in the prevalence of using payday loans to pay for gambling post-ban (two percent) compared with pre-ban (two percent). Main analysis of the five pre-ban waves and two post-ban waves (see chapter 2) found

no significant difference in the likelihood of using payday loans to gamble pre- and post-ban. To understand whether changes in borrowing money from risky sources were influenced by individual characteristics, we further conducted an adjusted logistic regression model controlling for age, gender, ethnicity, marital status, social class, and PGSI category, and again found no significant difference in likelihood.

In the interviews, a commonly discussed form of risky borrowing was through the use of payday loans. Some people who gamble reported using payday loans to pay for gambling both before and after the credit card ban, despite their high interest rates. This was the case where people who gamble felt it was easy to take out a loan, that they had control over their high interest loan re-payments, or that they had no other options due to low credit scores.

"It was just to cover up my extra bet. I know how much it's going to cost me and I used that one just to tide me over a little bit or to finish off my bet, that was it... unfortunately there was not any other option for me; that was the only option available for me, so that's why I chose that." – Person who gambles

Experience of risky borrowing

(COM-B: psychological capability; TDF: cognitive and interpersonal skills; COM-B: reflective motivation; TDF: intentions)

Some people who gamble continued paying for gambling with payday loans following the ban. These people felt that their regular loan re-payments were manageable and would rather save their own money to spend on daily expenses. One person who gambles mentioned that they only used a payday loan as a one-off because it was a quick way to get extra money to settle a bet that was outstanding.

"If I want to gamble, I wouldn't use my own money. With the loan your monthly fee is fixed, what you're paying back is fixed. With a credit card it's different because whatever balance you've accrued over...one month they could take up a higher payment from you, which is what was happening with me at the time. Since the ban it seems I can manage everything a bit better as well. It doesn't mean I'm going to be in debt." – Person who gambles

Among those affected by someone else's gambling, there was often a degree of uncertainty as to whether the people who gamble had used payday loans, although it was assumed that the main reason they would not be able to access payday loans would be due to low credit scores. As a result, there was a sense of relief from those close to the person who gambles because they could only borrow very small loans.

Others intended to stop using risky forms of borrowing but quickly became short of money when they were no longer able to use credit cards for gambling following the ban. Borrowed money was used to cover both gambling and living expenses following the ban and at times when there was not enough borrowed money to cover gambling expenses, another loan would be taken out.

"Had the loan in a separate account to try to stop myself gambling with it but it was easily transferred across so it went on gambling over a period of time... I was gambling on borrowed money every day, just not through a credit card, because I was either borrowing for myself and then putting that spending on credit or I was borrowing it from other loans that had been paid to me." – Person who gambles

One person who gambles felt they did not have the psychological capacity to stop themselves from taking out a payday loan to pay for gambling. Despite being aware of the risks involved, such as high interest rates, their desire to gamble was stronger than their ability to stop gambling with borrowed money. In this instance, the ban had no impact on their decision to gambling with risky forms of borrowed money.

“It goes back to that lack of consciousness of the risks. It sounds silly because it was me who did it. I get the risks of it, but that need to gamble overrides all those risks.” – Person who gambles

Awareness of risks

(COM-B: automatic motivation; TDF: emotion; COM-B: reflective motivation; TDF: beliefs about consequences)

In general, people who gamble commonly expressed a preference towards borrowing money from less risky sources to pay for gambling since the ban. One reason for this was the increased risk of not being able to pay back the loan.

“I’m too frightened to do that, because the interest is so ridiculous. I know once you get caught up with that, you’ve got a very high probability that you’re not going to be able to pay it back.” – Person who gambles

People who gamble also reported that they would not want to risk building up any further debt. People who had never gambled with borrowed money did not want to be in a position where they owed more money than they could easily pay back or run the risk of incurring a large amount of interest.

“I’ve never considered payday loans to fund gambling. The interest rates are just too ridiculous. I wouldn’t ever use payday loans or loan sharks at all.” – Person who gambles

“When borrowing with loans etc., that money (winnings) then sits in their account. It doesn’t go back off the loan they’ve taken to effectively gamble through secondarily. Then it’s there for them to gamble again with, so the risk of people gambling and losing it all is significantly higher.” – Affected other

In contrast, those who continued to pay for gambling with risky forms of borrowing did so because there was a belief that they would win back the money borrowed or were capable of paying it back as a set amount each month.

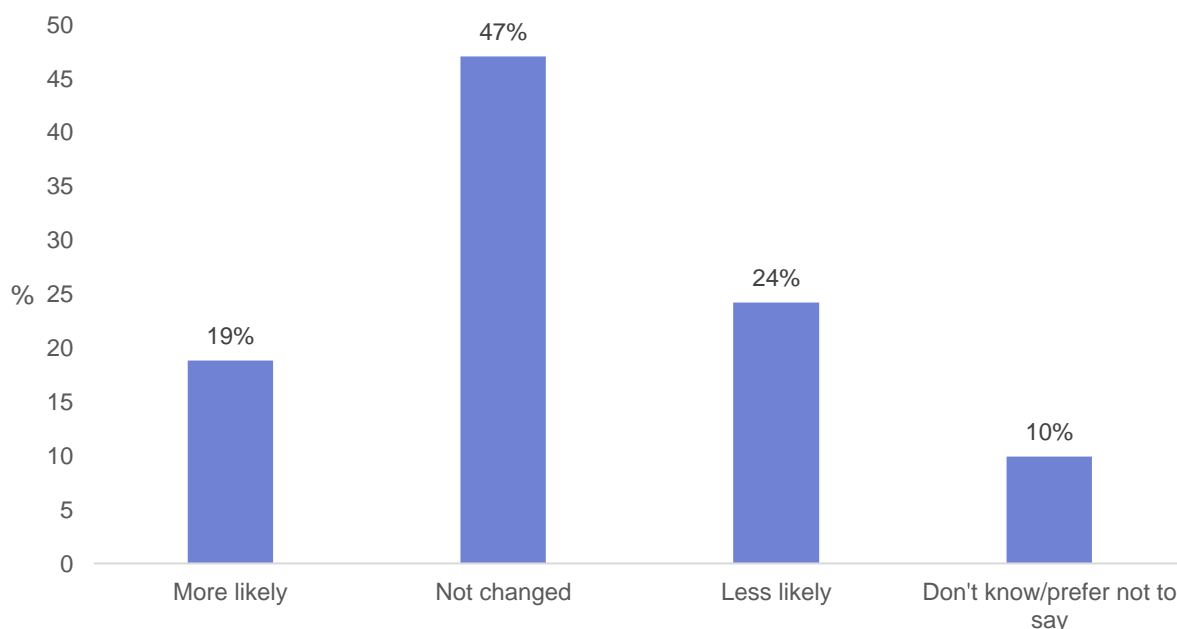
“The APR is very high but you’re thinking you won’t need to pay it back because you’ll win it back, so may only need to pay the very high APR for a day. Obviously, that never really happens.” – Person who gambles

Illegal sources of funding for gambling

In the September and December 2021 survey waves all those who gambled in the past were also asked whether they were more or less likely to do something that was against the law to pay for gambling or gambling debt since the introduction of the ban. This included examples such as taking money without asking, using somebody else’s account without permission, payment card fraud, and use of loan sharks. As shown in Figure 5.4, just under half (47%) reported that the ban had not changed whether or not they would do so. A further 24% reported

that they were less likely to do something illegal to pay for gambling, while 19% of people who gamble reported being more likely to do something illegal to pay for gambling since the ban was introduced.

Figure 5.4 Proportion of people who gamble who were more or less likely to do something illegal to pay for gambling since the ban



Source: Gambling Commission online tracker survey, waves September and December 2021.

Base: All respondents who have gambled in the past (n=677).

In the interviews, there was a consistent view that people who gamble tended to avoid illegal forms of borrowing to pay for gambling.

Fearful of the consequences

(COM-B: *reflective motivation*: TDF: *beliefs about consequences*)

People who had never paid for gambling through illegal means both before and after the ban expressed their concerns over the lack of protection and regulation associated with borrowing money for gambling from a loan shark. People who gamble were concerned about the wider risks this type of borrowing could pose to themselves and those close to them.

“The methods you mentioned before, the shark loans, we’re going into unregulated territory there, so it’s not regulated by the Financial Services Authority. You can be persecuted, you can have the local mafia knocking on your door, you can end up losing your house.” – Person who gambles

There were also some concerns around struggling to pay back the money to loan sharks because of the high interest rates often demanded. Given that these beliefs existed prior to the ban, in most cases the ban did not influence the decision of people who gamble to continue to avoid illegal forms of borrowing.

Encouraging the use of alternative options

(COM-B: *reflective motivation*; TDF: *intentions*)

During interviews with organisational stakeholder, gambling operators mentioned that their systems regularly looked out for instances where criminal activities had been used to fund gambling. For example, funding gambling with fraud. However, they suggested that because such behaviour is quite rare, it was often difficult to observe any differences. As such, these organisational stakeholders did not feel that the credit card ban impacted the use of fraudulent money to pay for gambling because people were more likely to turn to other forms of borrowed money available before considering the use of criminal activities.

In contrast, support providers were concerned about a small number of people who gamble that would make the decision to migrate to black market gambling options following the ban. While there was no evidence of this to their knowledge, support providers cited how easy it was to find foreign gambling operators who would continue to accept British credit cards, whether that be through an online search or the use of a VPN which makes it look as though the person who gambles was based abroad.

“I think it'll [the ban] have an effect and it probably is having an effect, but I think it's limited what it can do because there are always other sources that people with major gambling problems can rely on to keep gambling.” - Support provider

Support providers also felt that if people who gamble started to turn to black market gambling sites then there was no official way to complain about things that went wrong given that they were unregulated. While there was little definitive evidence of this yet, support providers felt strongly that there would be some displacement to other forms of paying money as a direct result of the credit card ban, in ways that allowed people experiencing problem gambling to bypass the ban.

5.2 Impact on wider gambling-related harms

Beyond the financial harms discussed in the previous section, the credit card ban also impacted wider gambling-related harms including individuals' relationships, wellbeing, health, or work. People who gamble and affected others who took part in the interviews identified some positive impacts from the ban on wider harms, such as an impetus to reduce their gambling overall, the ability to focus on debt reduction, and the chance to repair damaged relationships. However, there were also views indicative of legacy harms, for example that the ban did not start soon enough to prevent the harms from occurring, that the damage to mental and physical health from the stress of gambling would not ameliorate harms in the near future, and that trust in relationships was still fragile and would take time to repair.

Physical health

Those who experienced problem gambling prior to the ban, discussed the impact that the ban had on their physical health. For some, spending more money than they could easily pay back resulted in symptoms such as stress, stomach cramps, headaches, and fatigue. In one instance, the ban removed the option of borrowing money to fund gambling and enabled one person who gambles to start re-paying credit card debts. This had a positive impact on the affected other who became less stressed because they could see change in the person who gambles who was paying off their debt, rather than accumulating more debt. Despite reducing or stopping gambling, these symptoms often persisted as long as the participant was still concerned about their financial status and debt re-payments. This would indicate that poor physical health was a legacy gambling harm.

"I jokingly always say that I feel like it's aged me. I think I feel more drained and tired from sort of just everyday life, thinking about money all the time. I think it's something that is better than what it was, but I think until I've finally cleared my debt, I won't be able to wave goodbye to that chapter of my life. It's something that still weighs heavy." – Person who gambles

People experiencing problem gambling often reported coping with their gambling losses and stress by drinking alcohol. Drinking typically provided a way to forget how much money was lost or spent in a day. Other people who gamble reported that they gambled more when they had been drinking because of the ease of drinking in the comfort of your own home and accessing gambling online. For some, consideration of their health alongside the credit card ban contributed to the reduction of gambling following the ban.

"Alcohol can be a very dangerous thing with gambling because you turn to drink to get rid of the memories." – Person who gambles

Mental health

The findings from interviews stressed the negative impact that gambling had on the mental health of people who gamble. In some cases, people who gambled felt depressed, unhappy, ashamed, and down when they spent any amount of money on gambling. For others, their losses would play on their minds all day and at times leave them unable to sleep. One participant found it particularly difficult to cope with their gambling debt and as a result made an attempt on their own life, before seeking financial support and realising that gambling had taken a toll on their mental health.

"I think there is a cyclical relationship between mental health and gambling in terms of people with poor mental health gamble, and then gambling creates poor mental health. It's a bit of a never-ending cycle and I think I probably gambled because I was depressed and unhappy initially, and there's lots of life stresses and traumatic stress but gambling has created more issues, rather than solving it." – Person who gambles

"I literally wasn't myself for a while. I did feel down all the time, didn't want to go out." – Person who gambles

"Due to the debt related to gambling, I made attempts on my own life that were nearly successful and yes, obviously, that's when I realised things weren't quite right and when I sought help for the debt." – Person who gambles

Gambling large amounts of money also impacted the daily mood of people who gambled prior to the ban. Changes in feeling high or low were often linked to whether the person who gambles had experienced a win or a loss. For some, the period of feeling low after losing a bet was experienced as short and temporary, while others felt they became more difficult to be around because of their internalised feelings of worry or anger.

"I'd say sometimes if I'm feeling extra low or down because I've lost some money, then I'm not as cheerful or nice to be around, I would say." – Person who gambles

"The wins, they provide like a high, but that doesn't last very long. Then the losses, you don't want to remember them obviously." – Person who gambles

One person who gambles mentioned that had she not already started reducing the amount she gambled before the introduction of the ban, she would have found the ban to be a useful tool to limit her gambling and improve mental health outcomes. Following the ban, those who took steps to improve their mental health by stopping gambling altogether also reported that recovery was a long journey and not something that happened straight away.

Relationships

People who gamble commonly reported that their gambling negatively impacted their relationships with friends and family. For example, some recall becoming more closed off and withdrawing from their social groups, often coming up with excuses for not meeting up. One reason for this was that some participants felt embarrassed admitting to their friends that they gambled more than they could afford to lose, while for others gambling dominated their thinking and they could not be mentally present in their friendships.

"I was saying that I'm ill as well, and I was withdrawing myself away from my friends as well. They wanted to go out, like have a day, let's go for park for walk because over COVID, this and that. I was putting myself distant from my friends as well. They didn't ask me why, but I was going to do more gambling." – Person who gambles

"It tended to dominate my thinking for a while, and so in that sense I probably wasn't as clued into family and friends as I normally would be." – Person who gambles

In contrast, others reported that they were able to open up to their friends and family about their gambling and preferred to ask for them for advice rather than seek professional counselling. Some felt this helped them reduce their spending on gambling or stop altogether in combination with other factors such as 'maxing out' their credit card.

Those who stopped gambling following the ban felt that they were unable to stop worrying about the consequences associated with placing a small bet in the future. This would indicate that the negative impact on relationships was a legacy gambling harm. People who gamble often feared they would lose the trust gained from family, friends or children, or lose those relationships entirely.

"It's still something that reflects on life now; a letter might come through the post, my mum will want to know what it is. She'll worry that it's something, somebody, some company asking me for money again, things like that. There's definite things that I'll probably be living with forever." – Person who gambles

A similar picture was reported for personal relationships, where partners of those who gamble felt their excessive gambling placed a financial strain on their relationship. One reason for this was that it became difficult to save money because wages had to cover the cost of credit borrowed for gambling each month. In one instance, someone affected by their fathers gambling reported that their father credit card gambling reduced following the ban and their relationship began to improve because the family was less concerned about having money problems. Not being able to use a credit card for gambling meant they were able to put their disposable income towards paying off gambling debt.

The introduction of the credit card ban also improved relationships where gambling with a credit card had previously been carried out in secret. One person affected by their partners gambling felt they were able to trust their partner again given that the ban guaranteed that they would not be using a credit card to gamble.

“Well, it’s made me happier that the credit card ban has enabled us to become a lot more transparent. There’s a lot less opportunities for secrecy.” – Affected Other

Work

A small number of participants reported that gambling had a negative impact on their employment. For example, people experiencing problem gambling often felt their thoughts became consumed by the idea of gambling or the debt they’d built up, leaving them unable to concentrate at work. As a result, participants described regularly calling in sick to avoid going into work or in one case had been fired from their job.

“I was taking time off from the work as well because I didn’t want to go because I was piling myself in a debt. I didn’t know how am I going to face, and what am I going to explain to my workplace, like why I am having the day off?” – Person who gambles

One person who gambled prior to the ban, felt the ban was a “wake-up call” that helped them realise they were putting themselves in debt and withdrawing from others. This experience encouraged them to seek debt advice in order to gain a sense of control over their desire to gamble.

5.3 Awareness and use of safer gambling tools

The ToC had two outcomes relating to safer gambling tools and services: that the ban adds impetus to the practice and perceptions of safer gambling support by operators; and increased awareness of credit-related gambling harms results in more responsible play and increased uptake of safer gambling tools / self-exclusion.

The perceptions of gambling operators

Gambling operators we spoke with indicated that safer gambling tools were high priorities for their companies so that people could gamble sustainably. Within that context, the credit card ban was broadly accepted as a positive intervention related to safer gambling. Our participants mentioned upgrades to their safer gambling tools and systems that were underway or recently implemented. These new systems, combined with the COVID-19 pandemic and the ensuing national restrictions, meant that although operators noted a change in behaviours and even increased use of safer gambling tools during the period, they felt understandably reluctant to attribute any changes to the introduction of the credit card ban.

There was support among gambling operator interview participants for the credit card ban and for safer gambling services overall, with some reservations: they would have preferred more evidence for the benefits of the ban over other possible interventions; and more implementation time would have been welcomed so that other priority work on safer gambling tools was not postponed. There were also concerns that an essential way to identify people at risk of gambling harms (by monitoring credit card use for gambling) had been removed, and that the introduction of the ban might cause people to displace their gambling with credit cards to foreign operators.

According to our interview participants from gambling companies, the credit card ban was implemented alongside their existing development of safer gambling tools and services rather than acting as a stimulus to it.

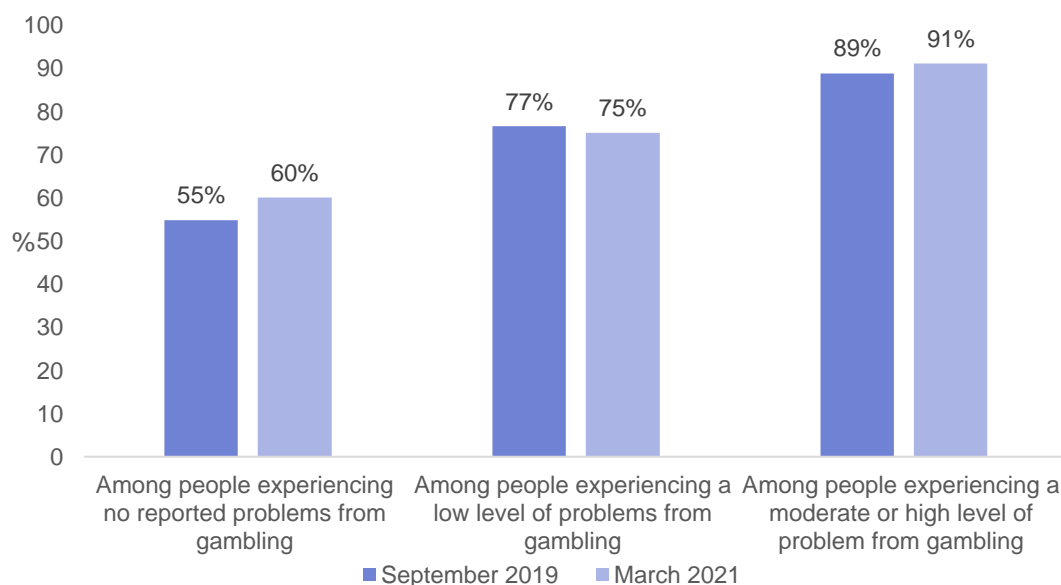
Survey findings on safer gambling tools

The online tracker survey asked whether people were aware of or had used any safer gambling tools, in two waves, one pre-ban and one post-ban. Among all respondents who gambled in September 2019, 64% reported

being aware of or having used any safer gambling tools, whereas in March 2021, 62% said they were aware of or had used safer gambling tools. This was not a statistically significant difference.

When adjusting for sociodemographic characteristics and then stratifying by PGSI category, only people experiencing no reported problems from gambling in the post-ban wave (March 2021) were more likely (AOR 1.29**) to say they were aware of or had used any safer gambling tools compared with those in the pre-ban wave (September 2019). This can be seen in Figure 5.5 below.

Figure 5.5 Proportion of people who were aware of or had used any safer gambling tools



Source: Gambling Commission online tracker survey, waves September 2019 and March 2021.

Base: All who had gambled in the past 12 months: September 2019 (n=1551); March 2021 (n=2076)

People who gamble and people affected by others' gambling – safer gambling tools

Awareness and use of safer gambling tools since the introduction of the ban was discussed with people who gamble and with those affected by others' gambling. Although there was widespread awareness among participants, no direct link acknowledged by people who gamble between the introduction of the ban and their awareness or use of safer gambling tools. There was some use of safer gambling tools, but universal exclusion services such as GAMSTOP and GamBan were reported to be more effective than the safer gambling tools offered by gambling operators.

Below, we present the themes that emerged in relation to safer gambling following the ban. People affected by the gambling of others gave some credence to the idea that the ban had a role in friends' or families' awareness of safer tools, and they themselves were aware of tools such as limits. There was some scepticism expressed about gambling operators' motives for providing safer gambling tools, through phrases such as "*covering themselves*" or "*lip service*". Other solutions, outside those offered by the gambling industry, were also reported by affected others, such as the use of banking apps and other budgeting tools, searching online for help with gambling problems, and using a mindfulness app to reduce the stress that may lead to gambling.

Awareness of safer gambling tools among people who had gambled with a credit card

(COM-B: *psychological capability*; TDF: *knowledge*)

There was awareness of safer gambling tools such as deposit limits, temporary or permanent self-exclusion from gambling websites, session spend limits or time limits, or self-exclusion from betting shops. Awareness of these tools and of responsible gambling messaging came from gambling websites and apps as well as TV advertising. Blocking features from banks to prevent gambling were also mentioned. There was some knowledge of the global long-term exclusion tool GAMSTOP.

Experience of using safer gambling tools among people who had gambled with a credit card

(COM-B: *psychological capability*; TDF: *behavioural regulation*; COM-B: *reflective motivation*; TDF: *beliefs about capabilities*; COM-B: *automatic motivation*; TDF: *reinforcement*)

A view held by people who gambled at a low level without experiencing problems was that they had not used safer gambling tools as they had not felt the need for them, or they could control their spending without assistance. At the other end of the scale where people had gambled and incurred high levels of debt, safer gambling tools had been tried but had not been effective as they could easily be switched off, or another gambling account opened with a different operator:

“You could only spend a certain amount, but then obviously that amount, you would spend that amount and then if you weren’t happy you could just sign up to another site. Although it helped on a specific site, it didn’t really help overall because you would still move on to something else.” – Person who gambles

The view of someone affected by a serious level of gambling and related debt about why their brother did not use safer gambling tools despite being aware of them through being on gambling websites daily was that he was not interested in setting himself limits:

“So, he bypasses that. It’s like terms and conditions. He’s not interested. He’s going to gamble; he’s going to gamble. He’s not interested what you’ve got to say about set a limit. He sets his limit, which is no limit.” – Affected other

One person affected by the sudden increase in gambling and debt of a friend, which had arisen in the early months of the pandemic, felt that it was a banking app and budgeting tool rather than safer gambling tools which were being used effectively to get the situation under control again.

GAMSTOP was mentioned as a very effective tool for people with serious gambling problems who may have tried the safer gambling tools mentioned above. It works by excluding the person from all gambling sites and activities for a long period, such as five years, and provides a bit of ‘friction’ for people who want to stop gambling altogether.

Among people who gambled fairly moderately but sometimes more than they would like, safer gambling tools had been used to good effect, for example a 60-minute session limit or a deposit limit. These were described in terms of disengaging the person or stopping them in their tracks. Such use by those with more moderate risk of gambling more than they would like was reported by people affected by their gambling, though it was not always directly discussed.

Attitudes towards safer gambling tools

(COM-B: psychological capability; TDF: behavioural regulation; COM-B: automatic motivation; TDF: reinforcement; COM-B: reflective motivation; TDF: beliefs about capabilities)

On one viewpoint, safer gambling tools were considered to be easy to access and displayed clearly on gambling websites with no particular barriers to use, although it is up to people whether they use the tools or not. The provision of safer gambling tools and phone call interventions about unusual patterns of gambling were felt to show that the companies cared about the customers and wanted to help them.

Several barriers to using safer gambling tools that people mentioned included: the inconvenience of missing out on a time-sensitive bet if a limit had been placed; companies and gambling apps being hard to contact and slow to respond to requests for safer gambling tools to be implemented; concerns about privacy and highlighting oneself as someone who may have a problem; and marketing techniques of gambling companies that target people with reminders and offers to come back once a temporary exclusion has completed. One person who had serious debts and had self-excluded from gambling websites said that he had then been promoted to directly by another brand in the same gambling company:

“I ended up being promoted to directly by the other brand names of the same company, who had known I’d self-excluded and they had emailed me. They never emailed me before. Started emailing me all of a sudden when I self-excluded from one of the other brands within the same company and I started gambling with them.” – Person who gambles

Opinions about the motivations of gambling operators to provide safer gambling tools were also voiced by people who gambled and by those affected by others’ gambling. For example, it was suggested that gambling companies provide the tools and responsible gambling messages only because they are legally required to, they are paying lip service to safer gambling, or are trying to appear to be doing the right thing. However, in the words of one person who gambles they are there to make a profit:

“They’re only there to make money from other people’s misfortunes.” – Person who gambles

There was a view that despite the safer gambling tools, gambling companies were not taking enough responsibility for ensuring that people were gambling affordably, while holding the information and algorithms to spot who may be experiencing problems.

“I just wish whoever they are, the gods that be who own all these gambling companies, did more for their customers. I feel like they should ask more questions of their customers before they take their money. That’s the only sort of bitter taste it leaves in my mouth. They know how much money they have taken from me over the years, but they still don’t ask the question of, ‘Can you afford this?’, etc., so I don’t think they’re doing enough.” – Person who gambles

Advice and support for gambling

(COM-B: psychological capability; TDF: knowledge/ behavioural regulation; COM-B: automatic motivation; TDF: emotion)

Reasons given for not seeking advice and support for gambling included: the concern that they might encounter someone they knew when seeking advice, the feeling that it would not help with the problem, having found an

effective external means of stopping gambling through GAMSTOP, and embarrassment about talking to anyone about gambling debt.

Where people had used advice and support services these had included counselling for gambling through GamCare, which was felt to be “*amazing*” (*Person who gambles*) and to have helped one person to stop gambling:

“[I]t’s only through their support and the counselling and the understanding and things that I was able to stop gambling and using GamBan and stuff like that, and those tools that are out there.” – Person who gambles

When asked about services in the community, there was some lack of knowledge among people who gamble, although perhaps because of online and app-based gambling there was more awareness of national, online services or groups on social media platforms, and services and support advertised on TV and gambling websites, for example GambleAware. Where local services were mentioned, these included Gamblers Anonymous, Citizens Advice, or local authority and local charity services. There was also some knowledge of local services through people’s own work where they may have referred clients or service users to advice, but not used this themselves.

In terms of perspectives from those affected by others’ gambling it was not always possible for them to be aware of what support had been sought, but the range of views included no support, approaching the NHS for support with gambling, couple counselling following the discovery of a secret credit card and gambling debt (before the credit card ban), and use of a mindfulness app to deal with stressful situations and avoid turning to gambling.

5.4 Theory of change and chapter findings

Table 5.1 below presents a mapping of findings, from the surveys and interviews on gambling-related harms since the ban, to elements in the ToC.

Table 5.1 Summary of evidence in relation to the ToC

Theory of change component	Findings from online tracker survey	Findings from qualitative interviews with organisational stakeholders, people who gamble and affected others
<p>Outcome: There is a reduction in gambling-related debt resulting in bankruptcy.</p>	<ul style="list-style-type: none"> – People who gamble were asked whether the ban had changed how likely they were to borrow more money than they could easily pay back in order to gamble. 60% reported that the ban had not changed their behaviour compared with 21% who reported that the ban made them less likely to borrow more money and nine percent who reported they were more likely. – Among all people who gamble who were aware of the ban, 21% were less likely to borrow more money than they could easily pay back. Those classified as moderate risk or problem gamblers were 30% less likely to borrow more. Compared with people who were classified as non-problem gamblers, 17% were less likely to borrow more money than they could easily pay back. – Among all people who gamble who were aware of the ban, nine percent reported that they were more likely to borrow more money than they could easily pay back following the ban. Among those classified as moderate risk or problem gamblers, 23% were more likely to borrow more. Compared with those classified as non-problem gamblers, only two per cent were more likely to borrow more money than they could easily pay back. 	<p>Those who perceived the credit card ban played a role in reducing their debt:</p> <ul style="list-style-type: none"> – The ban led some people to start monitoring their own spending, particularly those who now use their debit card to gamble. Some were encouraged by the ban to start paying back their credit card in regular instalments (COM-B: Capability; TDF: behaviour regulation); – There was some indication that the ban was particularly effective among those who were already motivated to reduce their gambling debt in order to attain personal goals (e.g., moving into a bigger house) (COM-B: Motivation; TDF: goals); and – In some cases, those who had taken steps to reduce their gambling prior to the ban still found the ban useful as it enabled them to continue to reduce their debts by removing an option and ensuring they could not gamble with a credit card again in the future should they want to (COM-B: Motivation; TDF: Beliefs about capabilities). <p>Those who perceived the ban made little / no difference in reducing their debt:</p> <ul style="list-style-type: none"> – Were already in control in terms of managing their current debt due to past traumatic experience of severe credit card debt prior to the ban (COM-B: Capability; TDF: memory, attention and decision processes); – Some people found themselves with more disposable income / spending less during COVID-19 and were able to help pay off their credit card debt, regardless of the ban (COM-B: Opportunity/ TDF: environmental context and resources); and – Some people were already seeking support from family to help them reduce their debt (COM-B: Opportunity/ TDF: social influences). <p>Impact of the credit card ban on bankruptcy:</p> <ul style="list-style-type: none"> – Interviews with people who gamble suggested that a large majority felt they did not have to resort to declaring bankruptcy; and – In one instance, it was reported that the person who gambles declared bankruptcy because they had come to the decision that it would be impossible for them to pay back all their gambling debt. (COM-B: Motivation; TDF: Beliefs about capabilities)
<p>Outcome: There is a reduction in gambling-related credit card / financial fraud.</p>	<ul style="list-style-type: none"> – All those who gambled in the past were asked whether they were more or less likely to do something that was against the law to pay for gambling or gambling debt since the introduction of the ban. Just under half (47%) reported that the ban had not changed whether or not they would do so. – A further 24% reported that they were less likely to do something illegal to pay for gambling, 	<p>Reason for not paying for gambling with illegal forms of borrowing following the ban:</p> <ul style="list-style-type: none"> – Financial and gambling operators felt that people who gamble were more likely to turn to less high-risk forms of borrowed money available before considering the use of criminal activities, such as fraud (COM-B: motivation; TDF: beliefs about consequences); – Some people who gamble were concerned over the lack of regulation when borrowing money for gambling from loan sharks and gave this as a reason for avoiding it as an option both before and after the ban (COM-B: motivation; TDF: beliefs about consequences; emotion);

Assumption:

People who gamble don't use illegal credit sources instead, like loan sharks, theft, or fraud.

compared with 18% of people who gamble who reported being more likely to do something illegal to pay for gambling since the ban was introduced. (Note: this is data based on people's attitudes and intentions, and not actual behavioural or fraud activity data).

- There were also some concerns around struggling to pay back the money to loan sharks because of the high interest rates often demanded (**COM-B: motivation; TDF: beliefs about consequences**); and
- Support providers were concerned about a small number of people who gamble that would make the decision to migrate to illegal gambling options following the ban. While there was no evidence of this, support providers cited how easy it was to find foreign gambling operators who would continue to accept British credit cards, whether that be through an online search or use of a VPN which makes it look as though the person who gambles was based abroad (**COM-B: reflective motivation; TDF: intentions**).

Assumption:

People who gamble don't use other high-cost credit sources instead, like payday loans.

- Post-ban, two percent of all those who had gambled in the last 12 months reported using payday loans to pay for gambling. This indicated a small reduction in the use of payday loans since the introduction of the ban.
- Among all people who gambled post-ban, they were less likely (AOR 0.77) to pay for gambling with payday loans compared with before the ban was introduced. Despite this reduction, the results were not statistically significant and so we cannot be confident in this result.

What drives people who borrowed from payday loans for gambling following the ban:

- Some people borrowed from payday loans for gambling as it was perceived to be easy to take out a loan and that they had control over their repayments, or because they had no other options given their low credit scores;
- There was a belief that they would win the money borrowed back (**COM-B: motivation; TDF: beliefs about consequences**); and
- Some people who gamble felt they did not have the psychological capacity to stop themselves from taking out a payday loan to pay for gambling, despite being aware of the risks involved, such as the high interest rates (**COM-B: Capability; TDF: Psychological**).

What drives people who stopped borrowing from payday loans for gambling following the ban:

- Some were fearful of risky borrowing and did not want to be in position where they owned more money than they could easily pay back (**COM-B: motivation; TDF: beliefs about consequences**); and
- Others were put off by the high interest rates associated with payday loans (**COM-B: motivation; TDF: beliefs about consequences**).

Assumption:

People who gamble do not move to unlicensed or black-market gambling operators.

- No data available.

- Some people who gamble avoided resorting to unlicensed lenders both before and after the ban given that they were unregulated and people who gamble were fearful of the consequences associated with being unable to make repayments (**COM-B: motivation; TDF: beliefs about consequences**).
- Financial and gambling operator interviews suggest that there is no easy way for gambling operators to track migration to black market gambling operators, particularly among credit card users, given that this is already such a small population (**COM-B: reflective motivation; TDF: intentions**).
- Support providers felt that as a direct result of the ban there was likely to be some displacement to other sources of payment for gambling, whether that be ways to by-pass the ban or simply using black market or foreign gambling operators which still accepted credit cards (**COM-B: reflective motivation; TDF: intentions**).

Outcome:

The ban adds impetus to the practice and perceptions of safer gambling support by operators.

- People who gamble were asked about any changes in how they've gambled since the credit card ban was introduced. Only one percent of

- Among some people classified as low risk gamblers, there was a belief that they did not need to use safer gambling tools and that they were not designed for them (**COM-B: Motivation; TDF: Beliefs about capabilities**).

	<p>respondents reported that they gambled with other forms of borrowed money excluding a credit card.</p> <ul style="list-style-type: none"> – Among respondents who had used borrowed money for gambling in the last 12 months, and reported the ban had made them less likely to do so or stop altogether, 39% reported the reason it made them less likely to was that they were more aware of the risks associated with borrowing money. 	<ul style="list-style-type: none"> – People classified as moderate or problem gamblers were aware of safer gambling tools but felt these were not always useful given that limits had to be set by yourself and could also be taken off by their own accord. (COM-B: motivation; TDF: beliefs about consequences). – Post-ban, one viewpoint was that safer gambling tools were considered to be easy to access and displayed clearly on gambling websites with no particular barriers to use (COM-B: Motivation; TDF: Beliefs about capabilities). <p>Alternatively:</p> <ul style="list-style-type: none"> – Others felt that gambling companies provided the tools and responsible gambling messages only because they are legally required to, or they are paying lip service to safer gambling, or are trying to appear to be doing the right thing.
<p>Outcome:</p> <p>Increased awareness of credit-related gambling harms causes more responsible play and increased take-up of Safer Gambling tools / self-exclusion.</p>	<ul style="list-style-type: none"> – The online tracker survey asked whether people were aware of or had used any safer gambling tools. 64% of all respondents reported being aware of or having used any safer gambling tools pre-ban whereas post-ban 62% said they were aware of or had used safer gambling tools, although this is not a statistically significant change. – There was a statistically significant increase in the level of awareness of safer gambling tools among people who were classified as non-problem gamblers (60% said they were aware in the March 2021 wave (post-ban) vs. 55% in the September 2019 wave (pre-ban)). – Similarly, regression models found that when we look across PGSI score categories, people classified as non-problem gamblers post-ban had 1.24 (OR 1.24*) higher odds of being aware of or having used safer gambling tools compared with people classified as non-problem gamblers pre-ban and this was a statistically significant change. In the stratified model, those classified as non-problem gamblers post-ban were more likely to be aware of safer gambling tools, after including control variables, compared with the same group pre-ban (AOR 1.29**). 	<p>Awareness of credit related gambling harms causes more responsible play:</p> <ul style="list-style-type: none"> – For those whose gambling reduced during the ban, this change was attributed to monitoring their own borrowing and spending (COM-B: capability; TDF: behavioural regulation); – Some reported that since the ban, they noted the high cost of borrowing money (e.g., loans), and this encouraged them to reduce their borrowing with one stopping altogether to use any credit facility; – However, for some people who gamble, they intended to continue paying for gambling with risky forms of borrowing money following the ban as they felt their loan repayments were manageable (COM-B: motivation; TDF: intentions); – The credit card ban encouraged some people who gamble to seek support to help them reduce their gambling debt through banks and Citizen Advice Bureau who provided people who gamble with free money advice or manageable payment plans. Some people who gamble felt the credit card ban encouraged them to take steps to start paying back the credit card debt in regular instalments, with one participant also mentioning the use of GAMSTOP (COM-B: Motivation; TDF: Beliefs about capabilities); and – When asked about services in the community, there was some lack of knowledge among people who had gambled with a credit card, although perhaps because of online and app-based gambling there was more awareness of national, online services or groups on social media platforms, and services and support advertised on TV and gambling websites, for example GambleAware (COM-B: Capability, psychological; TDF: Knowledge).

6. Discussion and conclusions

This chapter brings together the findings from the different workstreams and discusses the key findings in relation to the Theory of Change. There is discussion of the strengths and limitations of the evaluation. Lastly, we conclude with recommendations to inform design and implementation of future policies, as well as recommendations for future evaluation and research.

6.1 Summary of findings

Implementation of the credit card ban

The overall findings of the evaluation suggest that **the credit card ban was effectively implemented by gambling and financial operators in April 2020**. Implementing the ban required gambling operators to liaise with credit card organisations to identify BIN ranges of credit cards, and with e-money companies to find solutions to the potential risk of digital wallets being used to get around the ban (for example, by implementing a “double-wallet system”). This process largely relied on pre-existing relationships between individual gambling and financial organisations. Gambling operators suggested that these pre-existing relationships and the fact that the ban was industry-wide and mandatory facilitated the implementation.

The financial and gambling operators interviewed reported the lack of coordination and collaboration as one of the main barriers to implementation as it made the process less linear and more dependent on a wide range of direct, pre-existing relationships between organisations. This contributed to the view of the implementation as logistically time consuming. These organisational stakeholders also suggested that the timetable was too short, and the guidance provided by the Gambling Commission was unhelpful, which compounded the issues caused by logistics and lack of centralised coordination and collaboration.

Communications about the ban with people who gamble reached only some of gambling organisations’ customers. Some reported being aware of the ban before it was implemented, but others only found out about it after it came into effect. Emails and pop-ups on gambling apps were the main means to convey messages on the imminent implementation of the ban; however, some participants in qualitative interviews reported having the habit of ignoring emails from gambling operators as well as messages popping up while they are on gambling apps.

Both people who gamble and those affected by someone else’s gambling showed **a clear understanding of the ban’s consequences on use of credit cards to gamble**. They felt that the ban was implemented to prevent people from borrowing more than they can easily repay by removing a payment method that can be “abused” to the point of getting into “serious” debt.

Impact on gambling patterns and behaviour

Survey data and qualitative interviews showed a varied picture of the impact of the credit card ban on gambling patterns and behaviours, and while **it was possible in some cases to observe the increased friction listed among the outcomes of the Theory of Change (ToC), this did not always result in a pause in gambling, greater self-reflection, and changed patterns in gambling.** Overall, among all people who gamble the proportion of people using credit cards to borrow money for gambling has remained fairly stable. In the pre-ban wave March 2020, the proportion of all people who gamble who had used a credit card in the last 12 months was 6%, compared with 8% in the post-ban March 2021 wave. However, as this was not a statistically significant difference, we cannot be confident that this difference was not obtained by chance. Similarly, the proportion who had used any borrowed money for gambling (including credit cards, but also others forms of borrowing such as payday loans, use of overdraft facilities, or loans from friends and family) remained stable over this period, rising from 10% pre-ban (March 2020) to 11% post-ban (March 2021), which was also not a statistically significant difference. The issues with this relatively short time series on the use of borrowed money for gambling are discussed in the limitations section below.

The ban seemed to have a more noticeable impact on those experiencing a low level of, or no reported problems from gambling who were less likely to (directly and indirectly) use credit cards for gambling after the ban. In the survey data we saw a statistically significant decrease in the proportion of people experiencing a low level of, or no reported problems from gambling of: those who had used a credit card to gamble in the last 12 months: and those who had used any form of borrowed money to gamble in the last 12 months. From the interviews, it emerged that once credit cards were no longer an accepted payment method for gambling, some people switched to other methods such as debit cards and digital wallets, and others saw the ban as a chance to reflect on and change their gambling behaviour, or as a way to prevent them from going back to building high levels of gambling-related debt. The increased awareness of the harms related to the use of credit to gamble prompted in some a more responsible gambling behaviour and encouraged others to seek support and advice on reducing their gambling-related debt. The COM-B model and TDF analysis identified intention (COM-B: psychological capability), goals (COM-B: reflective motivation) and memory, attention, and decision processes (COM-B: psychological capability) as key drivers behind people's behaviours / actions to stop gambling with credit following the ban. Changes to behaviour that were identified included stopping using credit cards for gambling, or adjusting by changing payment method (e.g., debit card).

However, **while there was a decrease in credit card use and borrowed money use for gambling among those experiencing no reported problems from gambling and those experiencing a low level of problems from gambling, the proportion of those experiencing a moderate or high level of problems from gambling who had used a credit card in the last 12 months increased following the ban,** and the proportion that had used any type of borrowed money remained stable. This suggests that for people who experience problems with gambling, the ban does not do enough to prevent gambling with borrowed money. It is worth noting, however, the potential effects of a **change in the PGSI category in the survey samples.** Overall in the pooled dataset of five pre-ban waves and two post-ban waves, there was a higher percentage of respondents experiencing a moderate or high level of problems from gambling in the two post-ban waves (March and June 2021) wave (14%) compared with the same risk categories in the five-pre-ban waves (December 2018-March 2020) (11%). In logistic regression models this change in the sample was statistically significant with **post-ban waves respondents more likely to be experiencing a moderate or high level of problems from gambling than in the pre-ban waves (AOR 1.31***).** It should also be noted that this does not show what would have happened in the absence of the ban. The ban may have encouraged some people experiencing a low level of, or no reported problems from gambling *not* to increase their gambling, stopping them from moving into the more at-risk groups of people who gamble. The **increase in the number of people in the survey**

samples experiencing a moderate or high level of problems from gambling is important because **PGSI category was associated with how likely someone was to use a credit card to gamble with**. In the March 2021 and June 2021 survey waves, among people who said they had used a credit card to gamble with since the ban, 83% were experiencing a moderate or high level of problems from gambling, compared with six percent who were experiencing a low level of problems from gambling and 11% who were experiencing no reported problems from gambling. The association of higher PGSI score with likelihood of using a credit card to gamble with even post-ban was supported by the interviews. A theme emerged of those who had high credit card debts from gambling reporting that they continued to use their credit cards for gambling, albeit indirectly by switching their gambling to debit cards and continuing to pay for everyday living costs with their credit cards. Conversely, among those who gambled at a lower rate and had fewer concerns about their credit card use for gambling, there were reports of readily giving up the use of credit and other forms of borrowing, and instead beginning to budget for gambling to ensure that this was done from money they had available.

The increased prevalence of use of credit cards for gambling in the previous 12 months in the period following the ban may partially reflect the influence of the pandemic, which seems to have had a greater impact on the gambling behaviour of people with more serious gambling problems. For example, among those experiencing a moderate or high level of problems from gambling, 22% reported the pandemic had made them more likely to borrow money to gamble, compared with one percent among all those experiencing no reported problems from gambling. This suggests that the credit card ban was introduced at a time when it would be difficult to reduce borrowed money use among people who were gambling frequently. Regarding the indirect use of credit cards for gambling, **the ToC assumed that people who gamble would not have bypassed the ban with indirect use of credit cards**. Survey data showed that half (51%) of those who gambled with credit cards after the ban were using them indirectly. In the qualitative interviews, this was described by some as using credit cards to pay for everyday expenses to make more funds from other sources (e.g., debit cards) available for gambling. Some others reported being unaware of how to use credit cards indirectly, while others were aware of methods of indirect use but avoided using these because of concerns about the consequences (e.g., high costs). As reported by UK Finance, anecdotal feedback from the association's members indicates that some people who gamble have not stopped using credit cards to pay for gambling, but they have moved to unregulated, non-UK based gambling operators, or using credit cards indirectly (e.g., to pay for food and beverages).³⁵ The ban also gave the chance for individuals affected by other people's gambling to encourage further changes to the way those who gamble manage their money. These findings show the **importance of the knowledge of available alternatives** in determining gambling behaviours. However, they also indicate that **what participants believe about the consequences of their actions has an essential role in motivating their behaviours**.

Impact on gambling-related harms and use of safer gambling tools

The credit card ban also had a varied impact on gambling-related harms. **The ToC assumed that the introduction of the ban would have reduced gambling-related debt and that people who gamble would have not used high-cost and illegal credit sources**. The survey waves highlighted that after the ban more than one in five (21%) people who gamble were less likely to borrow more money they could easily repay to gamble, and 24% of respondents were less likely to do something against the law to pay for gambling, compared with 19% of respondents who were more likely to do it. Among people who gamble who were aware of the ban and used borrowed money when gambling, 30% said the ban had made them less likely to keep gambling if they needed to borrow money to continue, while seven percent said it had made them more likely to keep gambling.

³⁵ UK Finance response to the Gambling Act 2005 call for evidence consultation (p. 12): Available at: <https://www.ukfinance.org.uk/policy-and-guidance/consultation-responses/uk-finance-response-gambling-act-2005-review-call-evidence-consultation>. [Accessed 14 March 2023]

Among respondents who had used borrowed money for gambling in the last 12 months and reported the ban had made them less likely to do so, 39% reported the reason it made them less likely to borrow money to gamble was they were more aware of the risks associated with borrowing money.

The COM-B model and TDF analysis showed that **contextual opportunities, beliefs about consequences, social role and identity, social influences, emotions, goals, and beliefs about capabilities** were among the main determinants of participants' behaviour related to borrowing money to gamble. For example, some of those who decided to avoid borrowing money to gamble reported that the ban removed a more easily accessible source of borrowed money, some expressed concern about borrowing money with other methods (such as payday loans, overdraft facilities, and loan sharks) owing to the possible consequences for their finances and relationships, and others explained that borrowing money with other methods was not an option for them because it would clash with their own personality (for example, they would need to lie to others to borrow money just for gambling). Some participants also reported contextual factors (such as high interest rates, meaning they could not afford to borrow, or having less disposable income) as their main reason to avoid borrowing money to gamble.

Among people who used borrowed money to gamble after the ban, participants in the interviews gave a range of reasons for this. For some, borrowing money through bank loans was seen as an easier option to pay back and they felt sufficiently in control of the situation. Others explained that although they were aware of the risks, they felt unable to stop because their desire to gamble was stronger than their concerns or because they hoped to win back the money they borrowed. Some participants also felt the ban had made them more likely to use other forms of borrowing; credit cards had allowed them to gamble even when they did not have enough available money, and they felt that after the ban, borrowing money through other methods was the only option left to them.

There were also mixed perceptions of the role the ban played in reducing gambling debt from the interviews with people who gamble. Having clear goals and intentions had been identified as key drivers for reducing gambling debt. Some felt the ban increased their awareness of the risks of gambling-related debt and led them to start monitoring their expenditure and / or to make plans to pay back their debt. By contrast, others reported the ban had no role or only a small role in their decision to reduce their debt, either because at the time of the ban they were already managing their debt, they had already sought support, or because they had more disposable income (due to the COVID-19 pandemic) which was helping them paying off their debt regardless of the ban.

The comparison of pre- and post-ban waves of the survey did not find a statistically significant difference overall in the prevalence of awareness of safer gambling tools among all people who gamble. However, there was a significant increase in the prevalence of awareness of safer gambling tools for those who were not experiencing any problems with gambling post-ban in the stratified analysis. As mentioned above, this supports the notion that the ban may have made some people more aware of the risks linked to gambling-related borrowing and encouraged some to look for support and advice.

Influence of the COVID-19 pandemic on gambling and on the ban

Given the significant impact of the COVID-19 pandemic on people's everyday life and activities, the evaluation also explored its effect on gambling and on the outcomes of the ban. A majority (62%) of survey respondents reported not having changed the frequency of their gambling during the pandemic, two out of ten (21%) reported gambling less, and ten percent of respondents reported gambling more. However, these proportions were not the same across different groups, some (such as, younger respondents in the 18–34 age group, those experiencing a moderate or high level of problems from gambling, and people from ethnic minority groups) were more likely than others to have gambled more during the pandemic. Survey respondents and interview

participants reported that their main reasons to gamble more during the pandemic were having more free time, boredom, having more disposable income, trying to manage their mood, more online gambling making betting easier, and trying to make up their loss of income (due to the pandemic) with betting winnings. Among those who gambled less during the pandemic, common reasons for gambling less were the cancellation of most sport events, financial uncertainty (including loss of income), spending less time alone, moving to places with poorer internet connection, and deciding to reduce gambling-related debt. Participants were divided on how the COVID-19 pandemic and the ban interacted. Some thought the ban helped limit the potential increase in gambling activity that could have derived from boredom, easy access to online gambling, and loss of income (as a result of the pandemic). Others felt that the ban did not have a large impact on gambling and most of the changes were to be attributed to the pandemic.

Disruptive risks identified in the ToC

The ToC described some potential disruptive risks in introducing the ban, which might allow people to circumvent the ban or reduce its effectiveness.

- **Anticipating the ban by using credit cards to make a substantial deposit prior to the start of the ban:** There was a range of evidence from interviews with people who used a credit card for gambling about their behaviour in the weeks before the ban. Reported behaviours varied from placing a deposit from credit card funds into a gambling account while they could still do so, to not behaving any differently in the run up to the ban, and lastly to stopping the use of credit cards a little earlier than needed in the knowledge that the ban was coming into effect soon anyway. There was also some evidence from interviews with organisational stakeholders that gambling operators moved to implement elements of the ban before it officially came into effect, for example by preventing account holders from adding new credit cards to their gambling accounts in the weeks before the ban.
- **People who gamble who had used credit cards may find sources of alternative, and possibly higher cost, credit:** Among those who had gambled since the ban, two percent indicated that they had borrowed money for gambling using payday loans in the last 12 months. There was a small reduction compared with before the ban, but this was not statistically significant. Interviews revealed that those who used payday loans did so because they were easy to obtain, especially when individuals had low credit scores because of debts, while those who avoided payday loans did so because of the perception of risk and the high costs of using this form of borrowing.
- **People who gamble could ‘displace’ their direct use of credit cards by indirectly using them to make monetary deposits into digital-wallets (e.g., where credit card funds are ‘layered’ from one digital wallet to another) or withdrawing cash from an ATM with a credit card:** The combined dataset from the September and December 2021 survey waves indicated that among respondents who reported using credit cards for gambling after the ban, the most common means of doing so was by depositing funds in a digital wallet (26%). A further 20% reported using a money transfer card to move funds to a current account, and 17% that they withdrew cash from a card machine with a credit card to pay for gambling. However, the base size for this survey question was small ($n = 60$), so some additional exploration of this would be valuable to estimate the prevalence of these behaviours more accurately. The interview data suggested that there was a brief period after the ban, when people who gamble noticed that e-money or digital wallet companies had not yet blocked the use of credit cards for gambling. This observation was based on anecdotal evidence of other people who gamble using other similar services for a longer period post-ban. There was a feeling on the part of gambling operators that these newer payment services were not well understood by the Gambling

Commission and that the guidance on implementing the ban with such companies arrived late. Interview participants were generally aware of the costs of withdrawing cash with a credit card and avoided doing so.

- **People who gamble online in particular may switch to or intensify other forms of short-term credit which would substitute for credit cards, such as through their use of mobile phone payment methods which operate as a form of credit facility:** The combined data from the September and December 2021 survey waves indicated that among the respondents who stated they used credit cards post-ban (n=60), 14% had used this mobile phone facility. Interview participants were prompted about whether they had used their mobile phone accounts to use their credit cards indirectly for gambling, but this did not feature highly in the sample.
- **The credit card ban could lead to an expansion of unregulated sources of gambling (e.g., black market):** In interviews with organisational stakeholders, gambling operators indicated that they had no way of tracing migration of customers to black market or overseas-registered operators, while support service providers felt that such displacement was possible and likely, although there was no evidence of it from their service users. The combined data from the September and December 2021 survey waves indicated that among respondents who stated they used credit cards post-ban, seven percent reported doing so on a gambling website that allowed payment by credit card, while five percent reported using their credit card in person in a physical gambling premises. It is not clear how these people were able to gamble online or in person in gambling premises using a credit card and this was not reported during any of the interviews, but although the sample size for this question was small (n = 60), some further research to explore this may be valuable.

6.2 Strengths and limitations

While other countries have adopted similar policies to ban the use of credit cards for gambling to various degrees, evidence on the impact and effectiveness of such policies is limited. To the best of our knowledge, this is the first evaluation of a credit card ban policy. We have identified a number of strengths and limitations associated with this evaluation, which are discussed below.

Strengths

- **Mixed-methods approach:** The methodological approach used for this evaluation allowed an in-depth exploration of the implementation of the ban, its impact on gambling behaviours, as well as its impact on people who gamble and those affected by other people's gambling. The combination of quantitative and qualitative methodologies in this evaluation provides a more holistic understanding of the ban's effect. The approach has allowed us to identify the trends in people's gambling behaviour at a national level through repeated cross-sectional survey data and to conduct weighted descriptive analyses of people's gambling and gambling behaviour post-ban, as well as the impact of COVID-19, through two bespoke post-ban survey modules, combined into one dataset for analysis. At the same time, we explored the drivers and reasons behind those behavioural changes and added breadth of views and experiences through in-depth qualitative interviews with organisational stakeholders, people who gamble, and people affected by someone else's gambling. Additionally, the combination of qualitative and quantitative methodologies has helped to balance out the limitations of each method.
- **Repeated cross-sectional data:** This method allowed us to measure the prevalence of gambling, risky gambling behaviour, credit card use, and borrowed money use for gambling over the period of the ban's

introduction; and to estimate how far these had changed over that period by comparing with behaviour from before the ban.

- **Triangulation of quantitative and qualitative data:** Data triangulation allowed us to be more confident about the evaluation findings, through assessing the extent to which our data sources aligned or differed in relation to the outcomes of the ban.
- **Development of post-ban survey module:** Data from the post-ban survey module on gambling, gambling behaviours and the impact of the COVID-19 pandemic and national restrictions on gambling, allowed us to gain some insights into changes in people's gambling and the interaction with impacts of the pandemic.
- **Use of behavioural theories and framework – COM-B and TDF:** This approach allowed us to explore how the ban affected people's behaviours (i.e., identifying factors that shape specific behavioural change) in a systematic deductive way. The use of COM-B model and TDF is becoming progressively common in health and behavioural research, but studies on gambling that adopt this theory-based approach are relatively rare.^{36,37}

Limitations

We also identified some limitations which we tried to mitigate where possible:

- **Influence of the COVID-19 pandemic:** The ban was implemented around the same time as the start of the COVID-19 pandemic and the first lockdown. The pandemic led to significant changes in people's lives, and it had affected how they gamble and how much, as shown in chapter 4. In this evaluation, it was difficult to clearly discriminate between the impact of the ban and the confounding effect of the pandemic. However, efforts were made to explore and articulate the role of the pandemic in people's gambling behaviour and how this may have interacted with the ban through qualitative interviews and survey questions.
- **Self-selection bias:** The recruitment of participants for the qualitative interviews with people who gamble was mainly based on contacting those who completed the survey questionnaire and agreed to be re-contacted for a follow-up interview, and to a lesser extent on social media advertising. We were able to recruit a varied group of individuals via a purposive sampling approach. However, this was not a representative sample and it is not possible to rule out that potential participants with different experiences and perspectives may have excluded themselves by not agreeing to be contacted or by not responding to our invitation to be interviewed. Additionally, as noted in chapter 2, we contacted credit card organisations to explore their experience with the ban but to no avail. Therefore, we were unable to integrate their direct perspective in our evaluation of the ban, and we could only report on those aspects related to credit card companies discussed by other participants.
- **Sensitive topic:** Given the sensitivity of the topic discussed during the qualitative interviews, some participants may have censored themselves and provided incomplete answers. We tried to mitigate this limitation by having experienced researchers conducting the interviews, by having participant-led interviews,

³⁶ Botella-Guijarro, Á., Lloret-Irles, D., Segura-Heras, J.V., Cabrera-Perona, V., and Moriano, J.A.. (2020). "A Longitudinal Analysis of Gambling Predictors among Adolescents" *International Journal of Environmental Research and Public Health* 17(24): 9266.

³⁷ Botella-Guijarro, Á., Lloret-Irles, D., Segura-Heras, J.V., Moriano-León, J.A. (2022). Characterization and prediction of gambling behavior in adolescents using the COM-B model. *PLOS ONE* 17(11): e0277520.

and by confirming with the participants the confidentiality of their participation and their withdrawal options before, during, and after the interview.

- **Language and communication mode:** All the interviews were conducted in English and over the phone or via internet. This may have led to some less frequently heard participant groups being excluded.
- **Absence of counterfactual data:** To estimate the impact of any intervention, and to attribute that impact causally to a policy, counterfactual data is needed to assess what would have happened if the policy was not introduced. With national policies, such as the ban on using credit cards to gamble with, this can be a challenge, because the policy comes into effect across the whole country at the same time. Therefore, it is not possible to examine how gambling behaviour would have changed in its absence. Although we have data on borrowed money use for gambling collected before and after the ban's introduction, we cannot directly attribute any changes seen over that time to the ban. This is particularly the case when there were other major external changes (i.e., the COVID-19 pandemic) over the same time period. This means that when we evaluate the effect of the credit card ban, we must take into account other factors which may have been working alongside it over this time to shape people's gambling behaviour.
- **Short time series:** Our data on credit card and borrowed money use for gambling after the ban has been collected over a fairly short time period, up to June 2021. During this period the impact of the pandemic was still being felt in many areas. Given this, we would also recommend continued monitoring of trends in borrowed money use, to explore whether the effects of the ban continue in the long-term. Unfortunately, this will also be subject to the same lack of a counterfactual that the main evaluation has been. This means that it will not be possible to identify whether changes observed are due to external factors, such as the cost of living crisis which may push people experiencing serious levels of problems from gambling into using borrowed money if they are unable to fund gambling in other ways.
- **Small sample size in survey data on credit card use:** In the September / December 2021 survey waves participants were asked retrospectively about their credit card use when gambling in the last 12 months. However, in the combined dataset from these waves of the survey there were relatively few people (n=60) who had gambled with a credit card in the last 12 months, which limits our ability to explore the post-ban experiences of these people by looking at the experiences of sub-groups (such as those with a high PGSI score).
- **Limited repeated cross-sectional data:** The credit card ban ToC identifies several outcomes of the ban which this evaluation has sought to explore, however, survey data from before the ban did not cover all of these outcomes, which limits our ability to identify how trends developed over the period of the ban's introduction. In particular, we cannot identify changes in the levels of gambling-related debt and bankruptcy, which were an important outcome for the credit card ban. This highlights the need for evaluation plans to be built into the implementation and development stages of policy making, so the right data is available to understand their impact.

6.3 Recommendations

Implementation

As described above, gambling operators and financial operators were able to implement the ban effectively and on time. Based on their experiences of implementing the ban, several recommendations for the implementation of future policies have been suggested.

- **Better coordination and collaboration between all parties involved:** Some organisational stakeholders suggested that a more direct involvement of the Gambling Commission and of financial authorities (such as the Financial Conduct Authority) in coordinating the implementation of the ban would have been beneficial and would have reduced the pressure on individual gambling and financial organisations.
- **Engagement with all key stakeholders in producing guidance for policy implementation:** Organisational stakeholders recommended more collaborative discussions between the Gambling Commission and gambling operators about the complexities of implementing new policies. These discussions should result in clearer and more practical guidance from the Gambling Commission on how to implement a new policy.
- **Longer implementation periods:** This would allow for the necessary allocation of resources without taking them away from other tasks and to avoid customers experiencing issues.

Additionally, people who gamble and affected others also recommended improvements for the implementation of future policies.

- **Disseminating information about the ban widely through different channels:** Participants suggested the ban should have been advertised more widely before its implementation. They recommended that where a new policy is going to have an impact on how they pay when gambling, it should be communicated via a wide variety of online as well as offline methods in order to reach people who gamble and affected others, as well as the older age groups. Suggestions included email communications, communications via TV sporting channels, pop-ups via apps, social media advertising, and communications from banks and credit card companies.

Considerations for future policies

Support providers, people who gamble, and people affected by someone else's gambling made a number of suggestions for the design of future policies.

- **Banning of other forms of borrowing to gamble:** Participants suggested that a further step to protect consumers and add friction to the process of gambling with borrowed money would be a progressive banning of most forms of money borrowing for gambling. The data collected for this evaluation showed that the credit card ban was effective in creating some degree of friction which encouraged in some individuals a change in gambling patterns towards a reduced or less risky gambling activity. The banning of other forms of borrowing to gamble (e.g., bank loans) may further increase this friction and further reduce the creation of gambling-related debt. Designing this type of intervention may be more challenging for informal and illegal forms of borrowing (e.g., friends and family, loan sharks) given that they cannot be easily identified. As suggested by some participants, the implementation of ban policies for bank loans and other similar formal types of borrowing may prove to be relatively less challenging than banning informal and illegal forms of borrowing. It

was also suggested that a possible approach may consist in adapting the gambling operators' existing anti-money laundering systems and procedures.

- **Further possible measures for tackling gambling and gambling harms (in addition to the credit card ban):** As noted, the credit card ban has had a differential impact among people according to their circumstances (e.g., financial status, gambling risk level, and other characteristics). For instance, some participants reported that the ban had the unintended consequence of making the move towards riskier borrowing solutions by removing the option of using credit cards for gambling. This suggests that although it added a layer of friction, for some individuals it did not prevent them from using credit card use or borrowed money for gambling. Some participants suggested more systematic and granular affordability checks, the signposting of local support services identified through geolocation and after each bet (e.g., via pop-up messages on gambling apps), imposing on gambling operators maximum waiting times when asked by people who gamble for support to stop gambling (some reported waiting several days before a gambling operator acknowledged their request to block their own account), a system of progressively larger overdraft limits on debit cards and bank accounts that can be unlocked only if the previous debt has been paid off, and a central system for gambling payments to avoid people experiencing moderate and high gambling harms using different accounts to bypass other control systems. Additionally, as reported by some participants, boredom, mood management, and desire to make money through gambling were among the reasons that drove them to gamble more during the COVID-19 pandemic. Therefore, campaigns and initiatives dedicated to supporting people's mental health and to showing the risks and harms of excessive gambling may also prove to be beneficial in helping people manage challenging periods of their life and understand and recognise at an early stage the potential risks linked to their gambling behaviours.
- **Focus policy initiatives and spending on those most at risk:** Focus policies on reducing gambling-related harms on those most at risk; strengthen the credit card ban further by working with operators and with banks and payday loan companies to target those most at risk (e.g., by introducing further checks on how the money being used for gambling was sourced).

Recommendations for future evaluations and research

- **Focusing on people who have started gambling after the implementation of the ban and tracking long-term patterns:** Focusing on people who have started gambling after the implementation of the ban would allow us to assess the longer-term impact of the ban, on the creation of new debt and the reduction of credit-related gambling harms. Additionally, tracking long-term patterns of borrowed money use and debt accumulation resulting from gambling would help recognise, if they remain problematically high, that further interventions are needed to address this behaviour.
- **Focusing on people who are at high risk of gambling harms who have started gambling:** For people who experience problems with gambling, the ban does not do enough to prevent gambling with borrowed money, according to our findings. Focusing on monitoring data for those with the highest risk of harms when introducing similar policy initiatives to protect against harms; and continue using monitoring data on credit used, to further disentangle any impacts on gambling behaviour from the COVID-19 lockdown and to track long term impacts.
- **Exploring the extent and patterns of gambling on overseas websites:** A previous evidence review for Greo indicated that several other countries have prohibited gambling on websites licensed overseas or were

considering doing so. There was some evidence that switching to overseas websites was seen as a potential way to circumvent the credit card ban, so this could be an area for further research.

- **The role of smartphones in causing gambling harms:** The interviews with people who gambled highlighted that the gambling industry had not kept up with the impacts of ubiquitous smartphone use and the 24/7 accessibility of gambling apps. Further research into the impacts on people experiencing gambling harms could help to identify solutions.
- **Using relevant data from gambling operators and financial operators in addition to primary quantitative and qualitative data gathering, where feasible and appropriate:** This will enhance the evaluation through examining change in outcome(s) using real-time data on behaviours and gambling activities before and after the intervention.
- **Adopting theoretical models and frameworks in evaluation:** Adopting theoretical tools, such as the COM-B model and TDF, would help gain a more nuanced understanding of how a particular intervention affects and changes people's behaviour, and why.

6.4 Contextual update

At the time of publication, the gambling landscape has changed since the Credit Card Ban Evaluation's data collection completed in June 2021. For example, the publication of the Gambling Act Review White Paper.³⁸ The following points therefore account for this context change:

- Other jurisdictions have announced their intention to ban credit cards for gambling (Sweden) or have already implemented their own ban (Australia, Brazil). Evaluations of these policies will further supplement the lessons learned from this evaluation. Additionally, they will provide insight on the ban of other forms of modern payment methods, such as cryptocurrencies being included in the ban in Brazil.³⁹
- Some of the priorities identified in the Gambling Act Review White Paper reflect priorities and concerns identified by participants. For example, financial vulnerability checks and greater protection for people more vulnerable to gambling harms. The Department for Culture, Media, and Sport and the Gambling Commission will be introducing policy changes in the coming years following the Review.
- As part of its implementation plan, the Gambling Act Review White Paper is currently undergoing a stakeholder consultation, which may strengthen future policies.

6.5 Conclusions

Findings from this evaluation have indicated that the credit card ban has had a positive impact on some individuals and on their gambling behaviours, for example encouraging them to pay off existing gambling debts, giving them the chance to stop building debt, making them aware of the potential risks of borrowing money for gambling, and reducing the potential sources of temptation for those who were recovering from gambling-related

³⁸ Department for Culture, Media, and Sport (2023). High Stakes: Gambling Reform for the Digital Age. April 2023. Available at: https://assets.publishing.service.gov.uk/media/644923b5814c6600128d0723/1286-HH-E02769112-Gambling_White_Paper_Book_Accessible1.pdf

³⁹ Monteiro, R. and Pilar, A.F. (2024) Governo proíbe cartão de Crédito e Cripto Nas 'bets', Prêmio Terá de Ser Pago em 2 horas. O Globo. Available at: <https://oglobo.globo.com/economia/noticia/2024/04/18/apostas-on-line-governo-proibe-uso-de-cartao-de-credito-por-apostadores.ghtml>

harms. The ban also had little impact or a potentially negative impact (e.g., pushing some towards riskier and less traceable borrowing methods) on others. There is some evidence to suggest the ban has been more effective as an intervention for those experiencing a low level of problems from gambling than for those experiencing a moderate or high level of problems from gambling. Given this, further interventions targeting those experiencing a moderate or high level of problems from gambling is needed.

Nevertheless, the ban was broadly perceived by people who gamble, affected others, and organisational stakeholders as a step change in reduction of harm from credit-based gambling. It has also been recognised that a broader system-wide approach and multi-sectoral efforts are vital to tackle different levels of gambling and gambling-related harms. We recognise that this is an evaluation of a very complex intervention and has its own limitations, but we hope it may constitute a valuable example of a pragmatic assessment to guide any future interventions and policy decisions. Design of future policies may benefit from having a greater understanding, through behavioural assessment and research, of how different groups of people might respond to and behave as a result of the policy. Taking such differences into consideration when designing policies should help to develop relevant solutions to mitigate the risk of unintended consequences.

Appendix A

Methodology

Theory of Change and Evaluation framework

The Theory of Change (ToC) set out the circumstances surrounding the credit card ban and is summarised in Figure 2.2 in the main report.⁴⁰

The ToC was developed through an iterative process, it was refined as evidence emerged of the ban's effectiveness and as changes to behaviours and any unintended consequences became clearer. The ToC was developed with the Gambling Commission and the Evaluation Steering Group, informed by a commissioned Rapid Evidence Review,⁴¹ earlier research, and the evidence from the national consultation. It had also taken into account further comments from a number of stakeholders, including gambling industry representatives.

The ToC goes further than a 'logic' model, and provided a more comprehensive *framework* for looking, not just at how much and how well it is working (against expectations), but also if the founding assumptions and expectations were sound (and if they needed to change). This 'framework' looks at each of:

- The **context** (starting point) within which the ban will be introduced;
- The causal **mechanisms** (activity) which the ban is expected to address;
- The **expectations** (outcomes / final goal) of how the ban will bring about change and its outcomes;
- The **assumptions** underpinning how it is expected to work and its effective implementation; and
- The likely disruptive **risks** which might circumvent or reduce the effectiveness of the ban.

An evaluation framework was developed and informed by the ToC components. The evaluation framework outlines the relevant measures for each ToC component as well as the type of research tool used to gather this data.

⁴⁰ Greo Evidence Insights.[n.d.] Mapping a 'theory of change' for the Gambling Credit Card ban. Available at: <https://www.greo.ca/en/programs-services/resources/CC-Ban---Theory-of-Change.pdf>. (Accessed 2 November 2023)

⁴¹ Sztainert, T., Baxter, D., McKnight, S., & Voll, J. (2020). The Role of Credit Cards in Gambling: Rapid Evidence Review. GREO prepared for Gambling Commission. March 2020. Available at: https://www.greo.ca/Modules/EvidenceCentre/files/GREO_04_2020_CreditCardRER.pdf. [Accessed 9 April 2021] (Conducted by GREO between September and December 2019)

Appendix Table A.1 Evaluation Framework Outline

ToC statement / component	Measure	Research Tool
Output		
Credit card gambling ban successfully implemented	<ul style="list-style-type: none"> Proportion of people who gamble paying for gambling <i>directly</i> using a credit card. See also section on ToC assumptions below. 	<ul style="list-style-type: none"> Online Tracker Survey.
	<ul style="list-style-type: none"> Qualitative data collected from gambling operators and financial services companies on how the ban was implemented. 	<ul style="list-style-type: none"> Interviews with gambling operators and financial services firms.
Outcomes		
Increased 'friction' resulting in a 'pause' in gambling, greater self-reflection and changed patterns in gambling.	<ul style="list-style-type: none"> Proportion of people who gamble who are more likely to stop gambling if they need to borrow money following the ban. 	<ul style="list-style-type: none"> Online Tracker Survey.
	<ul style="list-style-type: none"> People's experiences of gambling after the ban and how the ban has affected those recovering from GRH. 	<ul style="list-style-type: none"> Interviews with people who gamble and treatment support providers.
Increased friction in gambling reduces relapse among those recovering from GRH.	<ul style="list-style-type: none"> Peoples' experiences of gambling after the ban and how the ban has affected those recovering from GRH. 	<ul style="list-style-type: none"> Interviews with people who gamble and treatment support providers.
A reduction of credit and other borrowed money use by 'debt-risk gamblers'.	<ul style="list-style-type: none"> Proportion of high PGSI score respondents who use credit to gamble with following the ban, compared with before the ban. 	<ul style="list-style-type: none"> Online Tracker Survey.
	<ul style="list-style-type: none"> People experiencing problem gambling and their experiences of gambling after the credit card ban and the use of borrowed money. 	<ul style="list-style-type: none"> Interviews with people who gamble, affected others, and treatment support providers.
There is a reduction in gambling-related credit card/financial fraud.	<ul style="list-style-type: none"> Proportion of respondents whose intention to engage in criminal or illicit activity following the ban was more or less likely. 	<ul style="list-style-type: none"> Online Tracker Survey.
	<ul style="list-style-type: none"> Experiences of credit card providers and gambling operators of gambling-related fraud following the ban. Experiences of people who gamble and affected others of gambling-related fraud following the ban. 	<ul style="list-style-type: none"> Interviews with people who gamble, affected others, and gambling operators.

	<ul style="list-style-type: none"> – Proportion of people who gamble reporting they are likely to be in debt (owing more than they can easily pay back). 	<ul style="list-style-type: none"> – Online Tracker Survey
There is a reduction in gambling-related debt resulting in bankruptcy.	<ul style="list-style-type: none"> – Experiences of people who gamble and affected others of gambling-related fraud following the ban. – Experiences of debt among people who gamble that supported following the ban. 	<ul style="list-style-type: none"> – Interviews with people who gamble, affected others, and treatment support providers.
The ban adds impetus to the practice and perceptions of safer gambling support by operators.	<ul style="list-style-type: none"> – Proportion of people who gamble using safer gambling tools before and after the ban. – How the ban has affected the experience of safer gambling support by operators. 	<ul style="list-style-type: none"> – Online Tracker Survey. – Interviews with people who gamble and treatment support providers.
Increased awareness of credit-related gambling harms causes more responsible play and increased take up of Safer Gambling tools/ self-exclusion.	<ul style="list-style-type: none"> – Proportion of people who gamble using self-exclusion tools and other safer gambling features. – How the ban has affected the experience of safer gambling support by operators. 	<ul style="list-style-type: none"> – Online Tracker Survey. – Interviews with people who gamble and treatment support providers.
Assumptions		
Operators implement the ban effectively and on-time.	<ul style="list-style-type: none"> – Proportion of people who gamble paying for gambling <i>directly</i> using a credit card. – Experiences of gambling operators in implementing the ban. 	<ul style="list-style-type: none"> – Online Tracker Survey. – Interviews with gambling operators.
Financial institutions block credit card payments to digital wallets.	<ul style="list-style-type: none"> – Proportion of people who gamble using means such as digital wallets to gamble. 	<ul style="list-style-type: none"> – Online Tracker Survey.
People who gamble don't make a large credit card deposit prior to ban introduction.	<ul style="list-style-type: none"> – Experiences of amount of ways to circumvent the ban, including using credit card to make a large deposit prior to the ban. 	<ul style="list-style-type: none"> – Interviews with people who gamble.
People who gamble don't use other high-cost credit sources instead, like payday loans.	<ul style="list-style-type: none"> – Proportion of people who gamble using high-cost sources of credit. – Experiences of using alternative (non-credit card) sources of borrowed money, including how and why these were used. 	<ul style="list-style-type: none"> – Online Tracker Survey. – Interviews with people who gamble, affected others, and treatment support providers.

People who gamble don't use illegal credit sources instead, like loan sharks, theft or fraud.	– Proportion of people who gamble using illegal sources of credit to pay for gambling	– Online Tracker Survey
	– Experiences of using illegal sources of borrowed money, including how and why these were used.	– Interviews with people who gamble, affected others, and treatment support providers.
People who gamble don't bypass the ban, by withdrawing cash with a credit card instead, layering funds through wallets or using pay-later phone billing methods.	– Proportion of people who gamble using means such as digital wallets, their mobile phone bills, or money transfers to pay for gambling.	– Online Tracker Survey
	– Experiences of using credit cards indirectly, including how and why this has been done.	– Interviews with people who gamble, affected others, and treatment support providers.
Inconvenience to people who gamble for leisure is minimised.	– How gambling operators have minimised the inconvenience to people who gamble for leisure.	– Interview with gambling operators.
	– Experiences of gambling among those who gamble for leisure after the introduction of the ban.	– Interviews with people who gamble.

Quantitative data collection methods

Online Tracker Survey

As outlined in the main report, the data which informs the quantitative analysis was collected on the Online Tracker Survey, a web survey conducted by Yonder for the Gambling Commission. The survey collects cross-sectional data quarterly from a nationally representative sample of up to 2,000 adults per wave, aged 18 and over in Great Britain. The achieved sample for each of the waves used in this analysis is shown in Appendix Table A.2 below.

Note that the final two waves presented in this table are for the September and December 2021 waves of the tracker survey. These were not included in the repeated cross-sectional analysis exploring levels of credit card and other borrowed money use, because comparable questions were not asked in these waves. However, these waves are also presented here because a different module of survey questions, asking retrospectively about credit card use in the period following the ban, was asked in these waves.

Appendix Table A.2 Weighted descriptives for control variables from all waves (all survey respondents) – percentage (%)

		Wave								
Age – 3 groups	Total	December 2018	March 2019	September 2019	December 2019	March 2020	March 2021	June 2021	September 2021	December 2021
18–34	28	28	28	28	28	28	28	28	28	28
35–54	34	34	34	34	34	34	33	33	33	33
55+	38	38	38	38	38	38	39	39	39	39
Unweighted Base	20820	2081	2093	2103	2067	2083	2076	2064	2082	2093
Gender										
Male	49	49	49	49	49	49	49	49	49	49
Female	51	51	51	51	51	51	51	51	51	51
Unweighted Base	20815	2081	2093	2103	2067	2083	2076	2064	2082	2088
Ethnicity – 2 groups										
White	90	93	93	92	92	92	87	87	87	87
Ethnic minority	10	7	7	8	8	8	13	13	13	13
Unweighted Base	20587	2061	2067	2065	2052	2065	2054	2040	2057	2076
Marital Status / Relationship Status										
Single	31	28	29	30	32	32	28	31	33	32
Married / civil partnership/ co-habiting	57	60	58	57	54	53	60	56	54	56
Widowed / separated / divorced	13	12	13	12	14	15	12	13	14	12
Unweighted Base	20682	2065	2077	2083	2060	2067	2058	2055	2069	2083

Social Class

AB	27	27	27	27	27	27	26	26	26	26
C1	28	28	28	28	28	28	29	29	29	29
C2	21	20	20	20	20	20	21	21	21	21
DE	24	24	24	24	24	24	24	24	24	24
<i>Unweighted Base</i>	<i>20820</i>	<i>2081</i>	<i>2093</i>	<i>2103</i>	<i>2067</i>	<i>2083</i>	<i>2076</i>	<i>2064</i>	<i>2082</i>	<i>2093</i>

PGSI score

People who do not gamble	25	21	23	26	25	24	27	27	26	28
People experiencing no problem from gambling	51	60	53	51	53	49	48	47	49	51
People experiencing low level of problem from gambling	12	12	13	13	11	14	11	11	11	10
People experiencing moderate or high level of problems from gambling	12	7	12	11	11	13	14	14	14	11
<i>Unweighted Base</i>	<i>20820</i>	<i>2081</i>	<i>2093</i>	<i>2103</i>	<i>2067</i>	<i>2083</i>	<i>2076</i>	<i>2064</i>	<i>2082</i>	<i>2093</i>

Qualitative methods: theoretical approach

Integration of COM-B and TDF models

The TDF domains have been mapped onto the relevant COM-B components and subdivisions, as shown in full in Appendix Table A.3 below, and more briefly in Table 2.10 in the main report. These components were also used to develop the topic guides and informed the thematic framework for the deductive analysis of interview transcripts.

Appendix Table A.3 TDF domains and comparison with COM-B model

COM-B Components	COM-B Subdivisions	TDF Domains	Description of TDF Domains ⁴²
Capability	Physical	Physical Skills	Ability or proficiency acquired through practice.
		Knowledge	Awareness of the existence of something.
	Psychological	Cognitive and Interpersonal Skills	Ability or proficiency acquired through practice.
		Memory, Attention and Decision Processes	Ability to retain information, focus on aspects of the environment, and choose between alternatives.
		Behavioural Regulation	Anything aimed at managing or changing objectively observed or measured actions.
Motivation	Reflective	Social/Professional Role and Identity	Coherent set of behaviours and displayed personal qualities of an individual in a social or work setting.
		Beliefs about Capabilities	Acceptance of the truth, reality or validity about an ability, talent or facility that a person can put to constructive use.
		Optimisms	The confidence that things will happen for the best or that desired goals will be attained.
		Intentions	A conscious decision to perform a behaviour or a resolve to act in a certain way.
	Automatic	Goals	Mental representations of outcomes or end states that an individual wants to achieve.
		Beliefs about Consequences	Acceptance of the truth, reality, or validity about outcomes of a behaviour in a given situation.
		Reinforcement	Increasing the probability of a response by arranging a dependent relationship, or contingency, between the response and a given stimulus.
		Emotion	A complex reaction pattern, involving experiential, behavioural, and physiological elements, by which the individual attempts to deal with a personally significant matter or event.
Opportunity	Physical	Environmental Context and Resources	Any circumstance of a person's situation or environment that discourages or encourages the development of skills and abilities, independence, social competence, and adaptive behaviour.
	Social	Social Influences	Those interpersonal processes that can cause individuals to change their thoughts, feelings, or behaviours.

⁴² Atkins, L., Francis, J., Islam, R. et al. 2017. A guide to using the Theoretical Domains Framework of behaviour change to investigate implementation problems. *Implementation Sci* 12, 77

Qualitative interviews

Organisational stakeholders

A total of seven interviews were conducted with key organisational stakeholders who were able to observe and share insights about the overall effects of the ban, such as:

- **Treatment / support providers:** three interviews were conducted with gambling treatment and support providers based across the UK (two from treatment and support providers and one from a support provider). Participants were identified through our own online searches and contacted and interviewed on the basis that they had experience working with people with problem gambling. The purpose of these interviews was to provide perspectives on the effects of the ban on people's gambling habits, in particular accessing or using other sources of borrowed money for gambling, instead of using credit cards.
- **Gambling operators:** three interviews were conducted with gambling operators. The sample was drawn from a list of operators identified through our own internet searches as well as including contacts previously known to the research team. The purpose of these interviews was to understand the process in which the ban was implemented, the effectiveness of the ban's implementation, barriers and facilitators to implementation, and recommendations for improvement.
- **Financial operators:** one interview was conducted with a financial operator identified through our own online searches. The purpose of this interview was to capture the experiences of payment service providers (i.e., credit card companies) who were involved in implementing the ban within their own systems and to explore the anticipated and unexpected consequences of such a change.

People who gamble

Participants were purposively sampled via the following criteria that allowed us to explore a wide range of perspectives and experiences (Appendix Table A.4):

Appendix Table A.4 Sampling criteria for interviews with people who gamble

Geographical area	– Participants were from Scotland, Wales and England.
People who experience a risk of high levels of gambling problems	– Those at the highest risk of credit card use and experiencing problems as measured by PGSI scores; and – Other at-risk groups: young people, men, ethnic minority groups.
Method used to fund gambling	– Current credit card users; and – Those who used credit cards before the ban but have now stopped.
Gambling status	– People whose gambling reduced after the ban; – People whose gambling increased following the ban; – People whose gambling stayed the same following the ban; and – People who have stopped gambling.

Within our sample of people who gamble, a range of characteristics were obtained in line with the sampling criteria above (Appendix Table A.5 below).

Appendix Table A.5 Achieved sampling characteristics of people who gamble

Gender	N
Male	14
Female	6
Ethnicity⁴³	
White	18
Asian	2
Age group	
18–24	0
26–34	3
35–44	3
45–54	7
65+	5
Gambling status since the ban	
Reduced gambling	9
Still gambling – unchanged	7
Stopped gambling	4

Affected others

Participants were purposively sampled via the following criteria (Appendix Table A.6):

Appendix Table A.6 Sampling criteria for interviews with affected others

When the credit card was used to gamble	<ul style="list-style-type: none">– Before the ban– After the ban
Relationship to person who gambles	<ul style="list-style-type: none">– Spouse/ partner, Sibling, Son/Daughter, Father/Mother– Other family member– Friend– Employer– Co-worker
Type of harm experienced	<ul style="list-style-type: none">– Financial harm– Relationship damage– Victim of crime– Poor mental health– Poor physical health– Change to employment status

⁴³ None of the participants in the interviews with people who gamble stated that they had Black, Mixed or Other ethnicity.

Within the achieved sample of people who were indirectly affected by others gambling (affected others), a range of characteristics were obtained in line with the sampling criteria above (Appendix Table A.7).

Appendix Table A.7 Achieved sampling characteristics of people affected by others' gambling

Gender	N
Male	4
Female	3
Ethnicity	
White	5
Black	1
Mixed	1
Age group	
18–24	2
26–34	1
35–44	1
45–54	1
55–64	2
Relationship to person who gambles	
Spouse / partner / former spouse / former partner	2
Daughter / son of person who gambles	2
Father / mother of person who gambles	0
Sibling / other family member	2
Friend / employer / co-worker	1

Interview topic guide development

The integration of the TDF and COM-B model in the topic guide for interviews with people who gamble allowed for a more in-depth exploration of factors that drives specific gambling behaviours. This also helped to explore the possible mechanisms in which the credit card ban influenced individual behaviours (such as seeking to access other sources of borrowed money and change in gambling status).

The topic guides were developed through the following four-step approach:



Logistic regression model outputs

The following tables present the full outputs of the logistic regression models described in the report text for each of the five outcomes, which combine the five pre-ban waves (December 2018, March 2019, September 2019, December 2019, and March 2020) and the two post-ban waves (March 2020 and June 2020). The exception to this is the safer gambling outcome, where data was available for only one pre-ban and one post-ban wave – September 2019 and March 2021.

These tables also include unadjusted stratified regression models which are not presented in the report text, which show fairly similar results to the adjusted models.

Appendix Table A.8 Logistic regression models predicting use of a credit card to gamble in the last 12 months (among all those who had gambled in the last 12 months)

	Unadjusted models				Adjusted models			
	Models stratified by PGSI category				Models stratified by PGSI category			
	All people who gamble	People experiencing no reported problems from gambling	People experiencing a low level of problems from gambling	People experiencing a moderate or high level of problems from	All people who gamble	People experiencing no reported problems from gambling	People experiencing a low level of problems from gambling	People experiencing a moderate or high level of problems from
Pre-ban	Ref	Ref	Ref	Ref	Ref	Ref	Ref	Ref
Post-ban	1.07 [0.90,1.27]	0.44*** [0.28,0.67]	0.29*** [0.16,0.53]	1.47** [1.15,1.88]	0.82* [0.68,0.98]	0.43*** [0.28,0.65]	0.29*** [0.16,0.51]	1.36* [1.06,1.75]
18–34	-	-	-	-	Ref	Ref	Ref	Ref
35–54	-	-	-	-	0.94 [0.77,1.15]	0.92 [0.59,1.44]	1.01 [0.65,1.57]	0.95 [0.72,1.24]
55+	-	-	-	-	0.66** [0.50,0.86]	0.65 [0.42,1.02]	0.77 [0.42,1.42]	0.58* [0.36,0.92]
Male	-	-	-	-	Ref	Ref	Ref	Ref

Female	-	-	-	-	0.67*** [0.56,0.80]	0.52*** [0.37,0.72]	0.55** [0.37,0.82]	0.84 [0.65,1.09]
White	-	-	-	-	Ref	Ref	Ref	Ref
Ethnic minority	-	-	-	-	1.94*** [1.53,2.45]	1.74 [0.93,3.27]	2.53*** [1.53,4.19]	1.76*** [1.32,2.35]
Single	-	-	-	-	Ref	Ref	Ref	Ref
Married / civil partnership / co-habiting	-	-	-	-	1.59*** [1.30,1.94]	1.45 [0.97,2.16]	1.71* [1.10,2.66]	1.59*** [1.21,2.08]
Widowed / separated / divorced	-	-	-	-	1.27 [0.86,1.86]	1.28 [0.70,2.33]	1.6 [0.71,3.60]	1.01 [0.53,1.91]
AB	-	-	-	-	Ref	Ref	Ref	Ref
C1	-	-	-	-	0.75* [0.60,0.94]	0.8 [0.53,1.21]	0.71 [0.43,1.17]	0.73 [0.53,1.01]
C2	-	-	-	-	0.85 [0.67,1.09]	0.81 [0.52,1.25]	0.72 [0.41,1.26]	0.93 [0.66,1.33]
DE	-	-	-	-	0.68** [0.54,0.86]	0.60* [0.39,0.93]	0.66 [0.41,1.07]	0.73 [0.52,1.02]
People experiencing no reported problems from gambling	-	-	-	-	Ref	-	-	-
People experiencing no reported problems from gambling	-	-	-	-	3.20*** [2.49,4.10]	-	-	-
People experiencing a moderate or high level of problems from gambling	-	-	-	-	12.69*** [10.25,15.70]	-	-	-
Unweighted sample size	10854	7521	1716	1617	10712	7437	1688	1587

Appendix Table A.9 Logistic regression model predicting use of borrowed money to gamble in the last 12 months (among all those who had gambled in the last 12 months)

	Unadjusted models				Adjusted models			
		Models stratified by PGSI category				Models stratified by PGSI category		
	All people who gamble	People experiencing no reported problems from gambling	People experiencing a low level of problems from gambling	People experiencing a moderate or high level of problems from	All people who gamble	People experiencing no reported problems from gambling	People experiencing a low level of problems from gambling	People experiencing a moderate or high level of problems from
Pre-ban	Ref	Ref	Ref	Ref	Ref	Ref	Ref	Ref
Post-ban	0.94 [0.81,1.08]	0.36*** [0.25,0.53]	0.40*** [0.26,0.62]	1.1 [0.87,1.38]	0.65*** [0.55,0.76]	0.35*** [0.24,0.51]	0.38*** [0.25,0.59]	1.01 [0.80,1.28]
18–34	-	-	-	-	Ref	Ref	Ref	Ref
35–54	-	-	-	-	0.82* [0.69,0.98]	0.91 [0.63,1.30]	1.14 [0.79,1.64]	0.70** [0.55,0.89]
55+	-	-	-	-	0.58*** [0.47,0.73]	0.68* [0.48,0.98]	0.79 [0.49,1.28]	0.39*** [0.26,0.59]
Male	-	-	-	-	Ref	Ref	Ref	Ref
Female	-	-	-	-	0.74*** [0.64,0.87]	0.59*** [0.45,0.77]	0.59** [0.43,0.82]	1 [0.79,1.26]
White	-	-	-	-	Ref	Ref	Ref	Ref
Ethnic minority	-	-	-	-	1.91*** [1.54,2.37]	1.79* [1.06,3.03]	2.10*** [1.36,3.24]	1.81*** [1.36,2.41]
Single	-	-	-	-	Ref	Ref	Ref	Ref
Married / civil partnership / co-habiting	-	-	-	-	1.38*** [1.17,1.64]	1.14 [0.83,1.56]	1.58** [1.12,2.23]	1.41** [1.11,1.81]

Widowed / separated / divorced	-	-	-	-	1.13 [0.82,1.55]	1.05 [0.65,1.69]	1.13 [0.58,2.18]	1.18 [0.69,2.02]
AB	-	-	-	-	Ref	Ref	Ref	Ref
C1	-	-	-	-	0.77** [0.63,0.94]	0.73 [0.52,1.03]	0.79 [0.52,1.18]	0.79 [0.59,1.07]
C2	-	-	-	-	0.84 [0.68,1.04]	0.8 [0.56,1.14]	0.78 [0.49,1.24]	0.89 [0.64,1.25]
DE	-	-	-	-	0.72** [0.59,0.88]	0.71 [0.50,1.02]	0.68 [0.45,1.03]	0.74 [0.55,1.00]
People experiencing no reported problems from gambling	-	-	-	-	Ref	-	-	-
People experiencing no reported problems from gambling	-	-	-	-	3.26*** [2.66,4.00]	-	-	-
People experiencing a moderate or high level of problems from gambling	-	-	-	-	20.22*** [16.90,24.20]	-	-	-
Unweighted sample size	10854	7521	1716	1617	10712	7437	1688	1587

Appendix Table A.10 Logistic regression model predicting use or awareness of a safer gambling tools in the last 12 months (among all those who had gambled in the last 12 months)

	Unadjusted models				Adjusted models			
	Models stratified by PGSI category				Models stratified by PGSI category			
	All people who gamble	People experiencing no reported problems from gambling	People experiencing a low level of problems from gambling	People experiencing a moderate or high level of problems from	All people who gamble	People experiencing no reported problems from gambling	People experiencing a low level of problems from gambling	People experiencing a moderate or high level of problems from
Pre-ban	Ref	Ref	Ref	Ref	Ref	Ref	Ref	Ref
Post-ban	0.95 [0.82,1.10]	1.24* [1.03,1.49]	0.93 [0.59,1.46]	1.29 [0.67,2.48]	0.98 [0.84,1.14]	1.29** [1.07,1.56]	0.84 [0.53,1.33]	1.22 [0.63,2.36]
18–34	-	-	-	-	Ref	Ref	Ref	Ref
35–54	-	-	-	-	0.77* [0.62,0.96]	1.01 [0.75,1.37]	0.73 [0.41,1.32]	0.45* [0.21,0.98]
55+	-	-	-	-	0.37*** [0.30,0.46]	0.48*** [0.36,0.65]	0.49* [0.25,0.99]	0.44 [0.17,1.14]
Male	-	-	-	-	Ref	Ref	Ref	Ref
Female	-	-	-	-	0.53*** [0.46,0.62]	0.60*** [0.49,0.73]	0.56* [0.34,0.91]	0.78 [0.40,1.52]
White	-	-	-	-	Ref	Ref	Ref	Ref
Ethnic minority	-	-	-	-	1.16 [0.89,1.52]	1.05 [0.70,1.59]	1.91 [0.84,4.36]	0.72 [0.32,1.62]
Single	-	-	-	-	Ref	Ref	Ref	Ref

Married / civil partnership / co-habiting	-	-	-	-	0.9 [0.74,1.08]	0.9 [0.70,1.17]	0.99 [0.57,1.73]	0.57 [0.28,1.17]
Widowed / separated / divorced	-	-	-	-	0.93 [0.71,1.22]	0.96 [0.68,1.37]	1.58 [0.62,4.04]	2.13 [0.44,10.27]
AB	-	-	-	-	Ref	Ref	Ref	Ref
C1	-	-	-	-	0.92 [0.76,1.12]	0.97 [0.75,1.25]	0.75 [0.40,1.40]	1.56 [0.57,4.26]
C2	-	-	-	-	1.18 [0.94,1.48]	1.11 [0.83,1.47]	1.21 [0.57,2.58]	2.03 [0.60,6.81]
DE	-	-	-	-	0.91 [0.73,1.12]	0.9 [0.69,1.18]	0.73 [0.38,1.43]	0.57 [0.23,1.45]
People experiencing no reported problems from gambling	-	-	-	-	Ref	Ref	Ref	Ref
People experiencing no reported problems from gambling	-	-	-	-	0.77* [0.62,0.96]	1.01 [0.75,1.37]	0.73 [0.41,1.32]	0.45* [0.21,0.98]
People experiencing a moderate or high level of problems from gambling	-	-	-	-	0.37*** [0.30,0.46]	0.48*** [0.36,0.65]	0.49* [0.25,0.99]	0.44 [0.17,1.14]
Unweighted sample size	3627	2105	471	467	3564	2078	462	457

Appendix Table A.11 Logistic regression model predicting use payday loans to pay for gambling in the last 12 months (among all those who had gambled in the last 12 months)

Payday loans	Unadjusted model	Adjusted model
Pre-ban	Ref	Ref
Post-ban	1.11 [0.77,1.60]	0.77 [0.53,1.13]
18–34		Ref
35–54		0.69 [0.46,1.03]
55+		0.25* [0.09,0.72]
Male		Ref
Female		0.94 [0.65,1.37]
White		Ref
Ethnic minority		1.2 [0.78,1.84]
Single		Ref
Married / civil partnership / co-habiting		1.48 [0.99,2.20]
Widowed / separated / divorced		1 [0.37,2.71]
AB		Ref
C1		0.98 [0.63,1.53]
C2		1.17 [0.71,1.92]
DE		0.48** [0.28,0.80]
People experiencing no reported problems from gambling		Ref
People experiencing no reported problems from gambling		3.17 [0.79,12.68]
People experiencing a moderate or high level of problems from gambling		98.75*** [30.94,315.17]
Unweighted sample size	10854	10712

Appendix Table A.12 Logistic regression model predicting problem gambling status in the last 12 months (all respondents)

Whether experiencing moderate or high level of problems from gambling		
Pre-ban	Ref	Ref
Post-ban	1.34*** [1.19,1.51]	1.31*** [1.16,1.48]
18–34		Ref
35–54		0.64*** [0.57,0.73]
55+		0.14*** [0.12,0.17]
Male		Ref
Female		0.47*** [0.42,0.53]
White		Ref
Ethnic minority		2.10*** [1.81,2.45]
Single		Ref
Married / civil partnership / co-habiting		1.11 [0.97,1.26]
Widowed / separated / divorced		0.87 [0.67,1.12]
AB		Ref
C1		0.83* [0.71,0.96]
C2		0.86 [0.72,1.01]
DE		1.09 [0.94,1.27]
Unweighted sample size	16645	16371

Appendix B Survey questionnaire

B.1 Survey questionnaire: Wave 1

Introductory questions

ASK ALL

BanAware

On 14 April 2020 a ban came into force which stops gambling businesses allowing people to use credit cards to gamble with in Great Britain. The ban applies to using a credit card to gamble online and in-person, with the exception of buying tickets for lottery draws or scratch cards face to face in retail premises.

Were you aware that this ban has been introduced?

1. Yes
2. No

ASK ALL WHO HAVE EVER GAMBLED

Routing from Gambling Commission Online Tracker – this was part of a module of questions following on from the Gambling Commissions regular online tracker survey. Some of the routing follows from those questions

PreBan

And thinking about the year before the credit card ban came into force (that is, the year leading up to April 2020), did you use any of these kinds of borrowed money for gambling?

Please select all that apply.

If you are not sure, please give us your best estimate or choose 'Don't know'.

1. Credit card
2. Overdraft facility
3. Payday loans
4. An unlicensed lender (loan shark)
5. Family and friends
6. Mobile phone account (adding the cost of gambling to your mobile phone bill to pay at a later date)
7. Other loans (such as a personal loan from a bank, secured loan or re-mortgage)
8. Other (please describe)
9. None
10. Don't know
11. Prefer not to say

ASK IF PreBan = 1-8

PreBan2

Again please think about the year before the credit card ban (before April 2020).

When you borrowed money to pay for gambling, did you ever borrow more money than you were able to easily pay back?

1. Often
2. Sometimes
3. Never
4. Don't know
5. Prefer not to say

ASK IF PreBan2 = 1 or 2 AND MORE THAN ONE OPTION SELECTED AT PreBan (1-8)

PreBan3

And thinking about those times when you borrowed more money than you could easily pay back, where did you borrow most of this money from?

Please select all that apply.

SHOW ONLY THOSE OPTIONS SELECTED AT PreBan

1. Credit card
2. Overdraft facility
3. Payday loans
4. An unlicensed lender (loan shark)
5. Other loans (such as a personal loan from a bank, secured loan or re-mortgage)
6. Family and friends
7. Mobile phone account (adding the cost of gambling to your mobile phone bill to pay at a later date)
8. Other (please describe)

ASK ALL WHO HAVE EVER GAMOLED [ALL WHO SELECTED GAMBLING OR BETTING ACTIVITIES a-t (including u) at Q1 MDD LABEL GTQ1LOOP_MAR20]

QCredit5

The next few questions are about any changes in how you gamble since the credit card ban was introduced in April 2020.

To remind you – the ban applies to using a credit card to gamble online and in-person, with the exception of buying tickets for lottery draws or scratch cards face to face in retail premises.

Since April 2020, which of these statements, if any, apply to you?

Please select all that apply.

1. I have stopped gambling altogether [EXCLUSIVE]
2. I have only gambled with money that is available to me (that is, not with borrowed money) [EXCLUSIVE]
3. I have gambled with a credit card directly or indirectly, for example, by withdrawing cash with a credit card to gamble with, or transferring money to another account, loading credit onto an e-wallet, or in some other way (apart from scratch cards or lottery tickets bought in shops)
4. I have gambled with other types of borrowed money (such as a loan or an overdraft)
5. Don't know
6. Prefer not to say

ASK IF QCredit5 = 1 OR 2, OR (4 AND NOT 3)

QCredit5a

And why did you (IF QCredit5 = 1 "stop gambling?"; IF QCredit5 = 2 "only gamble with money that was available to you?"; IF QCredit5 = 4 "gamble with other types of borrowed money, instead of a credit card?")

-
1. As a result of the credit card ban
 2. As a result of something else

Continued credit card use

ASK ALL WHO HAVE GAMBLLED IN THE PAST 12 MONTHS AND IF QCREDIT5 DOES NOT EQUAL 2

Routing from Gambling Commission Online Tracker

Q70_New

Have you used any of the following forms of borrowed money to fund gambling activity in the last 12 months?

Please select all that apply.

1. Credit card
2. Overdraft facility
3. Payday loans
4. An unlicensed lender (loan shark)
5. Family and friends
6. Mobile phone account (adding the cost of gambling to your mobile phone bill to pay at a later date)
7. Other loans (such as a personal loan from a bank, secured loan or re-mortgage)
8. Other (please describe)
9. None
10. Don't know
11. Prefer not to say

ASK ALL THOSE WHO USED A CREDIT CARD IN THE LAST 12 MONTHS [IF Q70_New = 1]

Credit1

You mentioned that you have used a credit card to fund gambling activity in the last 12 months.

In the last 12 months, how often have you done this?

1. Daily
2. At least once a week
3. At least once or twice a month
4. Less than once a month
5. Don't know
6. Prefer not to say

ASK ALL THOSE WHO USED A CREDIT CARD IN THE LAST 12 MONTHS [IF Q70_New = 1]

Credit1a

Still thinking about using credit cards to borrow money for gambling, how have you used a credit card to fund gambling activity in the last 12 months?

Please select all that apply.

1. Online on a gambling website which allowed payment by credit card
2. In person using a credit card in a physical gambling premises (such as a betting shop, casino, bingo hall, amusement arcade)
3. In person for a lottery draw or scratch card alongside other shopping
4. By withdrawing cash to gamble with from a cash machine using a credit card
5. By using a credit card to deposit funds in an e-wallet or digital wallet to pay for gambling with
6. Using a money transfer card, for example, by transferring funds to your current account

-
7. By adding the cost of gambling to your mobile phone bill, which was paid by credit card
 8. Other
 9. Don't know
 10. Prefer not to say

SOFT CHECK IF Q70_New = 1 AND CREDIT1A = 1 BUT NOT 2: "Paying directly with a credit card should not be possible when gambling online on websites based in Great Britain. Can we confirm you paid by credit card? To remind you – British gambling companies are only required to ban credit cards, which allow you to borrow money to pay for things up to an agreed limit – that you then pay back later. It does not affect debit cards, where you spend money that you already have in the bank.
Select next question to move on, or change your answer above."

SOFT CHECK IF Q70_New = 2 AND CREDIT1A = 2 BUT NOT 1: "Paying directly with a credit card should not be possible when gambling in person in a physical gambling premises. Can we confirm you paid by credit card? To remind you – British gambling companies are only required to ban credit cards, which allow you to borrow money to pay for things up to an agreed limit – that you then pay back later. It does not affect debit cards, where you spend money that you already have in the bank.
Select next question to move on, or change your answer above."

SOFT CHECK IF Q70_New = 2 AND CREDIT1A = 1 AND 2: "Paying directly with a credit card should not be possible when gambling in person in a physical gambling premises or when gambling online on websites based in Great Britain. Can we confirm you paid by credit card?
To remind you – British gambling companies are only required to ban credit cards, which allow you to borrow money to pay for things up to an agreed limit – that you then pay back later. It does not affect debit cards, where you spend money that you already have in the bank.
Select next question to move on, or change your answer above."

ASK IF Credit1a = "Other"

Credit1a_Oth

Please describe the 'other' way of using a credit card to gamble which you have used in the last 12 months.

1. OPEN [2,000]
2. Prefer not to say

ASK IF Credit1a = 1 to 8

Credit2

How often would you say you have paid for gambling in the last 12 months using a credit card (IF MORE THAN ONE OPTION SELECTED AT Credit1a "in each of the following ways"; IF ONLY ONE OPTION SELECTED AT Credit1a "in this way")?

LIST RESPONSES SELECTED AT Credit1a

1. Online on a gambling website which allowed payment by credit card
2. In person using a credit card in a physical gambling premises (such as a betting shop, casino, bingo hall, amusement arcade)
3. In person for a lottery draw or scratch card alongside other shopping using a credit card
4. Withdrawing cash to gamble with from a cash machine using a credit card
5. By using a credit card to deposit funds in an e-wallet or digital wallet to pay for gambling
6. Through a money transfer credit card

-
7. By adding the cost to a mobile phone bill, which was paid by credit card
 8. 'Other' way of using a credit card to pay for gambling

Response categories: Daily, At least once a week, At least once a month, At least on in six months, Once a year or less.

ASK IF Credit1a = 1

CREDIT2A

You mentioned that you used a gambling website in the last 12 months which allowed you to pay with a credit card.

What were the reasons you used this website?

Please select all that apply.

1. It was the website I normally used
2. The website let me pay with a credit card
3. It gave the best odds
4. Reputation of the company for being fair / trustworthy
5. Bonus offers
6. Brand name of the company
7. Range of products
8. It was recommended to me
9. It offered support to help me manage my gambling
10. Another reason (please describe)
11. Don't know
12. Prefer not to say

Gambling with other forms of borrowed money

ASK IF AWARE OF THE BAN AND A CURRENT GAMBLER [ASK IF BanAware = 1 AND IF QCredit5 = 2-4]

Borrow2

The next few questions are about the use of other types of borrowed money (besides credit cards) since the introduction of the credit card ban in April 2020.

Has the ban on using credit cards to pay when gambling made you more or less likely to use other forms of borrowed money (besides credit cards) to gamble with, since April 2020?

1. Much more likely
2. More likely
3. No change
4. Less likely
5. Much less likely
6. Don't know
7. Prefer not to say

CHECK: if QCredit5 = 2 AND Borrow2 = 1 or 2: "Earlier you answered that since the credit card ban you only gamble with money that is available to you, that is, not with borrowed money. Is it correct that since the ban you feel you have become more likely to gamble with borrowed money?"

ASK IF Q70_new = ANY OPTIONS 2 – 8

BorrowL2

In the last 12 months, how often would you say you have paid for gambling with these forms of borrowed money/in this way?

SHOW THOSE SELECTED AT Q70_New (Options 2 – 8)

1. Overdraft facility
2. Payday loans
3. An unlicensed lender (loan shark)
4. Other loans
5. Family and friends
6. Mobile phone account (adding the cost of gambling to your mobile phone bill to pay at a later date)
7. Other

Response categories: Daily, At least once a week, At least once a month, At least once in six months, Once a year or less, Can't remember

ASK IF AWARE OF THE BAN AND STILL USING BORROWED MONEY [IF BanAware = 1 AND IF QCredit5 = 3, 4]

Borrow1

In this question please think about a situation where you might need to borrow money to place a bet or continue gambling in some other way.

Since the introduction of the credit card ban, would you say you are more or less likely to stop gambling if this situation took place (rather than borrow money to gamble with)?

1. Much more likely to stop
2. More likely to stop
3. No change since the credit card ban was introduced
4. Less likely to stop
5. Much less likely to stop
6. Don't know
7. Prefer not to say

ASK IF Borrow1 = 1, 2

StopGam1

You said that you are more likely to stop gambling rather than borrow money to gamble with, since the credit card ban was introduced in April 2020.

Why would you say you are more likely to stop gambling since the ban in April 2020 (rather than borrow money to gamble with)?

Please select all that apply.

1. I am more aware of the risks of gambling using borrowed money
2. I am more aware of the costs of gambling with a credit card (transaction charges and higher interest rates)
3. A credit card was the way I paid for gambling and since the ban it is not possible
4. I gamble less now anyway than I did in the past so it would be easier to stop instead of borrowing money to gamble
5. I don't want my gambling to appear on a bank statement or app that someone else will see
6. Other (please describe)
7. Don't know
8. Prefer not to say

ASK IF Borrow1 = 3

StopGam2

You said that there has been no change in how likely you are to stop gambling rather than borrow money to gamble with, since the credit card ban was introduced in April 2020.

Why would you say you are just as likely / unlikely to stop gambling since the ban in April 2020 (rather than borrow money to gamble with)?

Please select all that apply.

1. I used other kinds of borrowed money (besides credit cards) to gamble before the credit card ban and will continue doing so
2. I am still able to use credit cards to pay for gambling, even since the credit card ban
3. I don't have money available in my bank account for gambling and I want to continue gambling
4. Other (please describe)
5. Don't know
6. Prefer not to say

ASK IF Borrow1 = 4, 5

StopGam3

You said that you are less likely to stop gambling rather than borrow money to gamble with, since the credit card ban was introduced in April 2020.

Why would you say you are less likely to stop gambling since the ban in April 2020 (rather than borrow money to gamble with)?

Please select all that apply.

1. I used other kinds of borrowed money (besides credit cards) to gamble before the credit card ban and will continue doing so
2. I am still able to use credit cards to pay for gambling even since the credit card ban
3. I don't have money available in my bank account for gambling and I want to continue gambling
4. Other (please describe)
5. Don't know
6. Prefer not to say

Other consequences of the ban

ASK IF AWARE OF THE BAN AND EVER GAMBLING IN THE PAST [IF BanAware = 1 AND ANY GAMBLING OR BETTING ACTIVITIES a-t (including u) SELECTED at GTQ1LOOP_MAR20]

Debt

Thinking about a situation where gambling might cause someone to borrow more money than they are easily able to pay back.

In your case, has the ban on using credit cards to pay when gambling made you more or less likely to borrow more money than you are easily able to pay back?

1. Much more likely
2. A bit more likely
3. No change
4. A bit less likely
5. Much less likely
6. Don't know
7. Prefer not to say

ASK IF Q70_new = 1 – 8 (ALL WHO HAVE GAMBLLED IN THE LAST 12 MONTHS)

Q70_new2

And in the last 12 months, when borrowing money to gamble with, have you ever borrowed more than you were easily able to pay back?

1. Often
2. Sometimes
3. Never
4. Don't know

ASK IF Q70_new2 = 1 OR 2

Q70_new3

Thinking about those times in the last 12 months when you borrowed more money than you could easily pay back, where did you borrow most of this money from?

Please select all that apply.

SHOW ONLY THOSE OPTIONS SELECTED AT Q70_new

1. Credit card
2. Overdraft facility
3. Payday loans
4. An unlicensed lender (loan shark)
5. Other loans
6. Family and friends
7. Mobile phone account (adding the cost of gambling to your mobile phone bill to pay at a later date)
8. Other (please describe)

ASK ALL THOSE WHO HAVE GAMBLLED IN THE PAST [ALL WHO SELECTED GAMBLING OR BETTING ACTIVITIES a-t (including u) at GTQ1LOOP_MAR20]

Crime

We are also interested in situations where people might do something that is not permitted or is against the law, to pay for gambling or to pay a gambling debt. For example, taking money without asking, using somebody else's account without permission, payment card fraud.

All your answers are confidential and will only be used for research purposes. It will not be possible to identify your responses in any published results. We will not be sharing your responses with any authorities or with anyone outside the research team.

If in the future you wanted to gamble or pay a gambling debt, but did not have access to money or credit at the time, how likely would you be to do something that is not permitted or do something that is against the law to fund this?

1. Very likely
2. Likely
3. Neither likely nor unlikely
4. Unlikely
5. Very unlikely
6. Would definitely not do anything that is not permitted or is against the law
7. Don't know
8. Prefer not to say

ASK IF **Crime** = 1-5

Crime2

To remind you, all your answers are confidential and will only be used for research purposes. It will not be possible to identify your responses in any published results. We will not be sharing your responses with any authorities or with anyone outside the research team.

And would you say the ban on using credit cards for gambling makes you any more likely or any less likely to do something that's not permitted or is against the law to pay for gambling or pay a gambling debt?

1. Much more likely
2. A bit more likely
3. Neither more likely nor less likely
4. A bit less likely
5. Much less likely
6. Don't know
7. Prefer not to say

Coronavirus pandemic

ASK ALL WHO HAVE GAMBLED IN THE PAST [ALL WHO SELECTED GAMBLING OR BETTING ACTIVITIES a-t (including u) at GTQ1LOOP_MAR20] AND IF QCREDIT5 DOES NOT EQUAL 1

Covid1

The next few questions are about gambling and the coronavirus pandemic.

During the pandemic, would you say you have gambled more or less often than before the pandemic?

1. Much more often
2. More often
3. I have not changed how much I gamble
4. Less often
5. Much less often
6. Don't know
7. Prefer not to say

ASK ALL WHO HAVE GAMBLED MORE OFTEN DURING THE PANDEMIC [ASK IF Covid1 = 1,2]

Covid2

Why do you think you gambled more often during the pandemic?

Please select all that apply.

1. More spare time
2. More disposable income available
3. Gambled to increase disposable income or meet financial needs
4. To manage my mood as a result of being in a pandemic
5. Gambling has been a way to keep in touch with friends or family
6. More online gambling has made it easier to gamble
7. More online gambling has made it harder to stop gambling
8. Other reason (please describe)
9. Don't know
10. Prefer not to say

ASK ALL WHO HAVE GAMBLLED IN THE PAST AND NOT STOPPED GAMBLING DUE TO THE PANDEMIC
[IF COVID1 = 1 – 5]

Covid3

We would now like you to think about borrowing money to gamble with during the COVID-19 pandemic.

Would you say that the coronavirus pandemic itself (and how it has affected you) has made you more or less likely to use borrowed money to pay for gambling?

1. Much more likely
2. More likely
3. The pandemic has not changed how likely I am to borrow money
4. Less likely
5. Much less likely
6. Don't know
7. Prefer not to say

Consent to a follow up interview

ASK ALL WHO HAD GAMBLLED WITH A CREDIT CARD BEFORE THE BAN OR WHO HAVE GAMBLLED DURING THE LAST 12 MONTHS (PreBan = 1 OR a-t (including u) at GTQ1LOOP_MAR20)

The client for this section is the National Centre for Social Research (NatCen), who are an independent social research agency.

They would like to carry out some follow up interviews with people who have gambled in the past to explore their experiences of gambling since the credit card ban. This research will be used to help understand how the ban has been working.

The interviews will be conducted over the phone by researchers at NatCen and will last about 60 minutes.

NatCen will offer a £20 voucher as a small 'thank you' to everyone who takes part in an interview.

If you tick 'Yes' below and provide your contact details, we will securely transfer these details to NatCen Social Research, one of NatCen's telephone interviewers may call you in the next few months to arrange an interview at a time convenient to you.

If you leave your name as someone who is willing to be interviewed, NatCen will keep your name and contact information separate from the rest of this questionnaire. The other answers that you give here will still be completely anonymous.

NatCen will delete all personal details as soon as the project is completed.

Would you be willing to be contacted for a telephone interview?

Yes No

If you leave your name as someone who is willing to be interviewed, NatCen will keep your name and contact information separate from the rest of this questionnaire. The other answers that you have given will still be completely anonymous.

Contact details (please type in if you are happy to be interviewed)

Name

Telephone

Email

B.2 Survey questionnaire: Wave 2

The survey questionnaire used for Wave 2 was similar to the previous one, with the following modifications:

-
- Q70_New was moved before QCredit5 with the introductory text to the question moved from QCredit5 to Q70_New
 - Credit1a_Oth was removed
 - Credit2 was removed
 - CREDIT2A was removed
 - StopGam2 was removed
 - StopGam 3 was removed

Appendix C Topic Guides

Summarised versions of the topic guides used in interviews with organisational stakeholders, people who gamble, and affected others are provided below.

C.1 Topic Guide: People who gamble

1. Introduction

2. Background

- About them:
- Changes to their situation during the Covid-19 pandemic:

3. Introduction to participants' gambling

- Their experience with gambling before the credit card ban. "Thinking back a couple of years, to before April 2020 ...".
- Impact of the pandemic on their gambling – from March 2020 onwards

4. Experience of gambling before and after the credit card ban

- Their use of credit cards and other methods to borrow money for gambling before April 2020
- Influence of family/ friends
- Knowledge of the ban before its implementation
- Since April 2020 – their use of credit cards for gambling if any.
- Use of credit cards in other ways (indirectly) for gambling if any:

5. Using other borrowed money for gambling

- Whether they borrow money in other ways (apart from credit cards) to use for gambling nowadays and how and how often:
- What about other kinds of borrowing for gambling which some people might feel are risky:
- Whether their use of borrowed money for gambling (apart from credit cards) has changed since the credit card ban in April 2020.
- What they think will happen if they borrow money for gambling, e.g., building up debt, borrowing money from friends and family – how they feel about it and effects on their relationships
- If participants don't borrow money (apart from credit cards) for gambling now, did they do this before the credit card ban?

6. Expenditure and debt

Thinking about borrowing money for gambling, either using a credit card or other ways of borrowing money:

- Whether they have ever borrowed more money for gambling than they could easily pay back, since the credit card ban in April 2020
- Whether this has had an effect on their financial position – how / why / how significant
- Current financial position
- If debt is an issue for them:

Criminal behaviour

- Can you think of a time since the credit card ban in April 2020, when you have done any of these things to pay for gambling or pay a gambling debt:
- Can you tell us a bit about why you did this?

7. Safer gambling, gambling-related harms (GRH), impacts of gambling on participants (10 mins – 5 mins without low priority sections)

- Whether they know of any tools or features that gambling companies offer to help them gamble safely.
- Whether they have looked for advice or support for their gambling since April 2020

Gambling-related harms and impact of gambling

- How has gambling impacted you:
- Whether they have experienced problems with their gambling in the past, felt that it was out of control in the past, or that it harmed them or those around them – before the credit card ban in April 2020.
- What services available in your community you are aware of or you used due to the consequences of gambling and why (low priority):

8. Reflections

- Overall reflections on the credit card ban:
- To what extent do they intend to continue using/ stop using credit cards for gambling
- Recommendations for improvement:
- Intentions for gambling in the future.

9. Closing the interview

- Final closing comments
- Affected others – snowballing
- Reassure participant about anonymity in our reports, in light of limits to anonymity
- Check in with the participant how they found the interview.
- After care leaflet
- Thank participant for their time.

C.2 Topic Guide: Affected Others

1. Introduction

2. Background

- About them:

3. The situation – background to the gambling and participants' relationship to the gambler

- About the person whose gambling is affecting the participant:
- Participant's own experience of gambling themselves, if any
- Describe the other person's gambling before the credit card ban – generally – as far as the participant knows. "Thinking back a couple of years, to before April 2020 ...".
- Have they had problems with gambling (debt, poor health, work issues, legal issues, etc.) from which they have recovered or which are still ongoing.
- How did the other person's gambling affect the participant – generally – before the credit card ban in April 2020 – 'Still thinking back to before April 2020 ...'?

4. Participant's experience of the other person's gambling with credit or borrowed money

- Participant's experience of the other person's gambling with a credit card – before the ban in April 2020:
- Knowledge of the ban before its implementation
- Why yes / no.
- What is their understanding of the credit card ban
- After the ban on using credit cards for gambling in April 2020 participant's experience of how the other person has paid for gambling:

5. Changes to the other person's behaviours around gambling – since the credit card ban – how these have affected the participant

If participant has already said the other person has now stopped gambling or is not borrowing money to gamble with – cover the topics below only if relevant.

- 'Thinking now about problems that are sometimes linked with gambling ...'
- Whether the other person has borrowed more money than they can easily pay back – since the credit card ban:
- Whether the other person has previously recovered from problems with gambling or harms in the past. If so, how this may have changed since the credit card ban, if at all – as far as participant knows:
- How has the other person's gambling affected the participant – generally – since the credit card ban in April 2020 – anything not already discussed. Prompts if needed:
- Whether there has been any change in the other person's gambling behaviour – in terms of responsible play, safer gambling etc – since the credit card ban in April 2020 – as far as the participant is aware. Prompts if needed:

6. The COVID-19 pandemic

- Changes to their situation during the COVID-19 pandemic, if any. Ask first about participant and then about person who gambles.
- Changes in the way the other person gambled due to the COVID-19 pandemic itself – from March 2020 onwards, if at all? If so, in what ways
- Reasons – in participant's view – for any of these changes in the gambler's behaviour that are because of the pandemic. (If not covered already)

7. Reflections

- Overall reflections on the credit card ban:

8. Closing the interview

- Final closing comments
- Reassure participant about anonymity in our reports, in light of limits to anonymity
- Check in with the participant how they found the interview.

-
- After care leaflet
 - Thank participant for their time.

C.3 Topic Guide: Help and support services providers

1. Introductions and background

- Name of organisation and kinds of services they provide
- Role

2. Implementing the credit card ban and its outcomes

- How were credit cards used by gamblers before the ban [This question only has the purpose of providing some context to the following questions and to help us review the gamblers' and affected others' TGs. So, it does not need to be explored in-depth].
- In general, how was the ban received in your organisation.
- In general, what kind of outcomes were observed by the participant
- Observed outcomes on gamblers after implementing the credit card ban
- Observed outcomes on those recovering from Gambling-related Harm (GRH) after implementing the credit card ban
- Observed outcomes on the use of borrowed money (including credit cards) after implementing the credit card ban
- Observed outcomes on debt after implementing the credit card ban
- Observed outcomes on safer gambling support and responsible play after implementing the credit card ban

Unintended outcomes

- What kind of unintended outcomes were observed / experienced
- How the outcomes (intended and unintended) were monitored and recorded
- Impact of the ban on the services they provide / plan to provide

3. Barriers and facilitators

- What were the perceived barriers other / your organisations encountered implementing the credit card ban
- What, if any, barriers were caused by the Covid-19 pandemic itself
- What were the perceived facilitators that helped other / your organisations implement the credit card ban

4. Reflections

- Overall reflections on the credit card ban:
- Recommendations for improvement:

5. Closing the interview

- Final closing comments
- Reassure participant about anonymity in our reports, in light of limits to anonymity – check if there was anything in the discussion that they would prefer wasn't quoted.
- Check in with the participant how they found the interview.
- Thank participant for their time.

C.4 Topic Guide: Gambling and financial operators

1. Introductions and background

- Name of organisation and kinds of services or products they sell (financial or gambling)
- Role

2. Implementing the credit card ban

Initial experience of the credit card ban

- How the ban was received by the participant and their organisation

Implementing the credit card ban

- How was the credit card ban implemented by gambling operators
- How was the credit card ban implemented by credit card and financial providers
- Cooperation and coordination of financial and gambling operators in implementing the credit card ban
- How has the COVID-19 pandemic impacted on the implementation of the credit card ban and its outcomes

3. Outcomes of the credit card ban

- In general, what kind of outcomes were observed by the participant and their organisation
- Impact of the credit card ban on gamblers and clients
- Consequences of the credit card ban on the use of borrowed money (including credit cards)
- Consequences of the credit card ban on debt
- Consequences of the credit card ban on financial fraud
- Consequences of the credit card ban on safer gambling support and responsible play

Unintended outcomes

- What kind of unintended outcomes were observed / experienced
- Has the credit card ban inconvenienced leisure gamblers

4. Barriers and facilitators

- What were the perceived barriers to implementing the credit card ban
- What, if any, barriers were caused by the Covid-19 pandemic itself
- What were the perceived facilitators to implementing the credit card ban

5. Reflections

- Overall reflections on the credit card ban:
- Recommendations for improvement:

6. Closing the interview

- Final closing comments
- Reassure participant about anonymity in our reports, in light of limits to anonymity – check if there was anything in the discussion that they would prefer wasn't quoted.
- Check in with the participant how they found the interview.
- Thank participant for their time.

Appendix D

Information sheets

D.1 Participant Information Sheet: People who gamble

Background

The National Centre for Social Research (NatCen) has been commissioned by the Gambling Commission (GC) to evaluate the ban to the use of credit cards to purchase gambling products, both online and offline (with the exception of non-remote lotteries). The ban has been implemented from April 2020 and since then the GC has monitored the application of the ban through requests for reports from financial institutions and gambling operators.

What is the evaluation about?

The purpose of the evaluation is to understand how the ban has been implemented and what impact has had on gamblers and other people affected by their gambling. This will contribute to understanding what outcomes have been achieved and what has worked well and less well. To do so, part of our evaluation is to conduct interviews with gambling operators, financial operators, those providing support and help to gamblers, those affected by others' gambling, and gamblers, such as yourself.

What is my involvement?

You have already taken part in our survey and you are receiving this information sheet because you expressed your interest in being interviewed to explore more in details the impact that the ban has had on you. The interview will take place over the phone or using Microsoft Teams and it will last around 60 minutes. The research team can work with you to arrange an interview at a time and date convenient for you. With your permission, the interview will be audio recorded using a secure and encrypted software named Amolto, so that there is a detailed and accurate record of what was discussed. This recording will be deleted at the end of the evaluation. The interview topics will include:

- Your experience of gambling before and after the credit card ban;
- How and why your behaviours and habits have changed after implementing the ban;
- How and why the COVID-19 pandemic has impacted your experience of gambling and the pandemic interactions with the credit card ban;
- Recommendations and suggestions for improvement.

Is the discussion confidential?

Yes, what you discuss with our researchers is completely confidential. Neither the GC nor other third parties outside of the research team will be made aware of your participation.

NatCen will carefully manage your personal data. The information you provide will be held securely and in strict confidence in accordance with the General Data Protection Regulation (GDPR).

The information you provide will be brought together with other data and used to write a report for the GC. We will not identify you in the reports or presentations of the evaluation findings. Your personal details and the interview data collected will be deleted as soon as possible after the completion of the project.

Do I have to take part?

Your participation is confidential and entirely voluntary, and if you agree to participate you are free to change your mind at any point prior to, during, or after the interview. During the interview you do not have to answer any questions that you would prefer not to. If you would like to withdraw prior to or after the interview (within 2 months of your interview), please get in touch with the research team using the contact details below. If you would like to withdraw during the interview, please just let the researcher interviewing you know.

How can I take part?

Please contact us back at ccban-project@natcen.ac.uk. Once we receive your email, one of our researchers will be in touch to invite you to interview. When we contact you, we will ask you a short set of questions before inviting you to an interview. As well as answering any questions you have, this is to understand your experience of the ban a little better – occasionally we have to choose between potential participants to ensure that the evaluation covers a range of experiences

If you require any additional support to participate in the interview, please let the researcher know when booking the interview. For example, some participants may want a family member or friend to sit in on the interview for support, or if English is not your first language, to help with interpretation.

Should you decide to participate in an interview, we will also send you an aftercare leaflet which provides some additional information about services you can access. This is to ensure that you know where to find support following the interview if, for instance, anything discussed upsets you. However, you will not have to answer any questions you do not want to, and you can also stop or pause the interview at any time, and let our researcher know if you are having any difficulties at all.

More information on the evaluation

If you would like to know more about how the information you provide will be processed, please see the privacy notice on our website by following this [link](#).

For more information please also contact the project team at:

Telephone: XXXX

Email: ccban-project@natcen.ac.uk

D.2 Participant Information Sheet: People affected by the gambling of others

Background

The National Centre for Social Research (NatCen) has been commissioned by the Gambling Commission (GC) to evaluate the ban on the use of credit cards to purchase gambling products, both online and offline (with the exception of non-remote lotteries). The ban was implemented in April 2020 and since then the GC has monitored the application of the ban through requests for reports from financial institutions and gambling operators.

What is the evaluation about?

The purpose of the evaluation is to understand how the ban has been implemented and what impact it has had on gamblers and on other people affected by their gambling. This will contribute to understanding what outcomes have been achieved and what has worked well and less well. To do so, part of our evaluation is to conduct interviews with gambling operators, financial operators, those providing support and help to gamblers, those affected by others' gambling, such as yourself, and gamblers.

What is my involvement?

You are receiving this information sheet because you expressed interest in taking part in a confidential interview to talk about the impact that the ban has had on you.

The interview will take place over the phone or using Microsoft Teams and it will last around 60 minutes. The research team can work with you to arrange an interview at a time and date convenient for you. With your permission, the interview will be audio recorded using a secure and encrypted software named Amolto, so that there is a detailed and accurate record of what was discussed. This recording will be deleted at the end of the evaluation. The interview topics will include:

- Your experience of other people's gambling before and after the credit card ban;
- How and why their behaviours and habits have changed after the ban was introduced;
- How these changes have affected you;
- How and why the COVID-19 pandemic has impacted the other person's gambling habits and the interactions of the pandemic with the credit card ban;
- Recommendations and suggestions for improvement.

Is the discussion confidential?

Yes, what you discuss with our researchers is completely confidential. Neither the GC nor other third parties outside of the research team will be made aware of your participation.

NatCen will carefully manage your personal data. The information you provide will be held securely and in strict confidence in accordance with the General Data Protection Regulation (GDPR).

The information you provide will be brought together with other data and used to write a report for the GC. We will not identify you in the reports or presentations of the evaluation findings. Your personal details and the interview data collected will be deleted as soon as possible after the completion of the project.

Do I have to take part?

Your participation is entirely voluntary, and if you agree to participate you are free to change your mind at any point before, during, or after the interview. During the interview you do not have to answer any questions that you would prefer not to. If you would like to withdraw before or after the interview (within 2 months of your

interview), please get in touch with the research team using the contact details below. If you would like to withdraw during the interview, please just let the researcher interviewing you know.

How can I take part?

Please contact us at ccban-project@natcen.ac.uk. Once we receive your email, one of our researchers will be in touch to invite you to interview. When we contact you, we will ask you a short set of questions before inviting you to an interview. As well as answering any questions you have, this is to understand your experience of the ban a little better – occasionally we have to choose between potential participants to ensure that the evaluation covers a range of experiences.

If you require any additional support to participate in the interview, please let the researcher know when booking the interview. For example, some participants may want a family member or friend to sit in on the interview for support, or if English is not your first language, to help with interpretation.

If you decide to participate in an interview, we will also send you an aftercare leaflet which provides some additional information about services you can access. This is to ensure that you know where to find support following the interview if, for instance, anything discussed upsets you. However, you will not have to answer any questions you do not want to, and you can also stop or pause the interview at any time, and let our researcher know if you are having any difficulties at all.

More information on the evaluation

If you would like to know more about how the information you provide will be processed, please see the privacy notice on our website by following this [link](#).

For more information please also contact the project team at:

Telephone: XXXX

Email: ccban-project@natcen.ac.uk

D.3 Participant Information Sheet: Gambling and financial operators

Background

The National Centre for Social Research (NatCen) has been commissioned by the Gambling Commission (GC) to evaluate the ban to the use of credit cards to purchase gambling products, both online and offline (with the exception of non-remote lotteries). The ban has been implemented in April 2020 and since then the GC has monitored the application of the ban through requests for reports from financial institutions and gambling operators.

What is the evaluation about?

The purpose of the evaluation is to understand how the ban has been implemented and what impact has had on gamblers and other people affected by their gambling. This will contribute to understanding what outcomes have been achieved and what has worked well and less well. To do so, part of our evaluation is to conduct interviews with gambling operators and financial operators, such as yourself, as well as those providing support and help to gamblers, those affected by others' gambling, and gamblers.

What is my involvement?

The interview will take place over the phone or using Microsoft Teams and it will last up to 45 minutes. The research team can work with you to arrange an interview at a time and date convenient for you. With your permission, the interview will be audio recorded using a secure and encrypted software named Amolto, so that there is a detailed and accurate record of what was discussed. This recording will be deleted at the end of the evaluation. The interview topics will include:

- How the ban has been implemented;
- What are the consequences (positive and negative) of implementing the ban;
- What changes in the behaviour of gamblers have you observed since the ban came into effect;
- What impact has the credit card ban made on gambling harms;
- How the COVID-19 pandemic has interacted with the credit card ban;
- Lessons learned, recommendations and suggestions for improvement.

Is the discussion confidential?

Yes, what you discuss with our researchers is completely confidential. Neither the GC nor other third parties outside of the research team will be made aware of your participation.

NatCen will carefully manage your personal data. The information you provide will be held securely and in strict confidence in accordance with the General Data Protection Regulation (GDPR).

The information you provide will be brought together with other data and used to write a report for the GC. We will not identify you in the reports or presentations of the evaluation findings. Your personal details and the interview data collected will be deleted as soon as possible after the completion of the project, which is currently due in October 2022.

Do I have to take part?

Your participation is entirely voluntary and if you agree to participate you are free to change your mind at any point prior to, during, or after the interview. Your participation or non-participation is strictly confidential and has no effect on your relationship with the GC. During the interview you do not have to answer any questions that you would prefer not to. If you would like to withdraw prior to or after the interview (but not later than April 2022),

please get in touch with the research team using the contact details below. If you would like to withdraw during the interview, please just let the researcher interviewing you know.

How can I take part?

Please contact us back at ccban-project@natcen.ac.uk. Once we receive your email, one of our researchers will be in touch to invite you to interview. When we contact you, we will ask you a short set of questions before inviting you to an interview. As well as answering any questions you have, this is to understand your experience of the ban a little better – occasionally we have to choose between potential participants to ensure that the evaluation covers a range of experiences.

If you require any additional support to participate in the interview, please let the researcher know when booking the interview.

More information on the evaluation

If you would like to know more about how the information you provide will be processed, please see the privacy notice on our website by following this [link](#).

For more information please also contact the project team at:

Telephone: XXXX

Email: ccban-project@natcen.ac.uk

Appendix E Aftercare leaflet

E.1 Aftercare Leaflet: Not interviewed

Thank you for expressing an interest in taking part in the research and apologies that we cannot interview you at this time. For some, discussing or reaching out about their experiences may be upsetting or distressing. In this event, we want to ensure that you have the contact details of organisations who you can talk to if needed and who can help you. We provide a copy of this leaflet to all people, whether they take part in the research or not, to ensure that everyone has the resources to seek help and support if needed.

Support for problem gambling – for anyone worried about their or someone else’s gambling

- **National Gambling Helpline** – confidential advice, support, and information on problem gambling (support provided by the National Gambling Treatment Service network and GambleAware)

Helpline: 0808 8020 133 (Freephone 24 hours, 365 days a year)

Website and Live Chat: <https://www.begambleaware.org/>

- **National Problem Gambling Clinic** – part of the National Gambling Treatment Service network and is jointly commissioned by GambleAware and NHS England. To ask about being referred to the clinic you can contact them on:

Helpline: 020 7381 7722 (Calls and emails will be returned within 24-72 hours)

Email: gambling.cnwl@nhs.net

Website: <https://www.cnwl.nhs.uk/services/mental-health-services/addictions-and-substance-misuse/national-problem-gambling-clinic>

- **GamCare** – free information, advice and support for anyone harmed by gambling (part of the National Gambling Treatment Service network); phone, live chat; group chat and forum available to contact others online in similar situations and to find support

Helpline: 0808 8020 133 (Freephone 24 hours, 365 days a year)

Website and Live Chat: <https://www.gamcare.org.uk/>

- **Gordon Moody** – advice, counselling, online support for gamblers and their friends and family.

Helpline: 0808 8020 133 (The National Gambling Helpline freephone 24 hours, 365 days a year)

Phone: 01384 241292

Website and Live Chat: <https://gordonmoody.org.uk/friends-family/>

Financial support

The following organisations can provide you with information about financial issues and debt:

- **Citizens Advice** – advice on debt, benefits, employment, housing, discrimination
Telephone: 0800 144 8848 – Adviceline (England); 0800 702 2020 – Advicelink (Wales) (Mon-Fri 9am–5pm)
Chat service: <https://www.citizensadvice.org.uk/about-us/contact-us/contact-us/chat-service-money-and-debt/>
Website: <https://www.citizensadvice.org.uk/>
 - **Debt Advice Foundation** – specialist debt charity offering free, confidential advice on any aspect of debt
Telephone: 0800 043 4050 (Mon-Fri 8am–6pm)
Website: <https://www.debtadvicefoundation.org/>
 - **Money Helper** – free guidance on all aspects of money including money troubles (a government service, was Money Advice Service)
Telephone: 0800 138 7777 (Mon-Fri 8am–6pm)
Webchat: <https://www.moneyhelper.org.uk/> (Mon-Fri 8am-6pm; Sat 8am-3pm)
Website: <https://www.moneyhelper.org.uk/>
 - **National Debtline** – free and confidential advice on debt from a charity run by the Money Advice Trust. Supporting people in England, Wales and Scotland.
Telephone: 0808 808 4000 (Mon-Fri 9am–8pm; Saturday 9:30am-1pm)
Website and Webchat: <https://www.nationaldebtline.org/>
 - **StepChange** – debt charity providing free debt advice online
Telephone: 0800 138 1111 (Mon-Fri 8am-8pm; Sat 8am-4pm)
Website and Webchat: <https://www.stepchange.org/>
 - **Shelter** – free information, support and advice to people facing homelessness or experiencing housing issues
Helpline: 0808 800 4444
Website: <http://www.shelter.org.uk>
 - **The Trussell Trust** – nationwide network of food banks providing emergency food and support
Telephone: 01722 580180
Website: <https://www.trusselltrust.org>
 - **Universal Credit (UC) helpline** – advice on Universal Credit
Helpline: 0800 328 5644
Website: <https://www.gov.uk/universal-credit/contact-universal-credit>
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Personal and emotional support

The organisations below can provide you with personal and emotional support:

- **Samaritans** – free and confidential emotional support if you need to talk

Helpline: 116 123 (24 hours)

Email: jo@samaritans.org

Website: <https://www.samaritans.org/>

- **Mind** – a mental health charity with a wealth of information on mental health conditions and services

Infoline: 0300 123 3393 (Mon-Fri 9am-6pm)

Website (national Mind): <https://www.mind.org.uk/>

Website (to find local Mind): <https://www.mind.org.uk/information-support/local-minds/>

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For any queries about this research please contact the NatCen research team at ccean-project@natcen.ac.uk or call Crescenzo Pinto on XXXX.

E.2 Aftercare Leaflet: Participants who have gambled

Thank you for taking part in an interview with us about your experience of the ban on using credit cards to fund gambling. We are very grateful for your participation, which will help us understand how the ban has affected people who have gambled with a credit card, how people's pattern of gambling may have changed, and to hear people's views about the ban. We hope that your experience of taking part was positive.

For some participants, discussing their experiences may be upsetting or distressing. We want to ensure that you have the contact details of organisations who you can talk to and who can help you. We provide a copy of this leaflet to all participants to ensure that everyone has the resources to seek help and support if needed.

Support for problem gambling

- **National Gambling Helpline** – confidential advice, support, and information on problem gambling (support provided by the National Gambling Treatment Service network and GambleAware)

Helpline: 0808 8020 133 (Freephone 24 hours, 365 days a year)

Website and Live Chat: <https://www.begambleaware.org/>

- **National Problem Gambling Clinic** – part of the National Gambling Treatment Service network and is jointly commissioned by GambleAware and NHS England. To ask about being referred to the clinic you can contact them on:

Helpline: 020 7381 7722 (Calls and emails will be returned within 24-72 hours)

Email: gambling.cnwl@nhs.net

Website: <https://www.cnwl.nhs.uk/services/mental-health-services/addictions-and-substance-misuse/national-problem-gambling-clinic>

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- **GamCare** – free information, advice and support for anyone harmed by gambling (part of the National Gambling Treatment Service network); phone, live chat; group chat and forum available to contact others online in similar situations and to find support

Helpline: 0808 8020 133 (Freephone 24 hours, 365 days a year)

Website and Live Chat: <https://www.gamcare.org.uk/>

- **Gordon Moody** – advice, counselling, online support for gamblers and their friends and family.

Helpline: 0808 8020 133 (The National Gambling Helpline freephone 24 hours, 365 days a year)

Phone: 01384 241292

Website and Live Chat: <https://gordonmoody.org.uk/friends-family/>

Financial support

The following organisations can provide you with information about financial issues and debt:

- **Citizens Advice** – advice on debt, benefits, employment, housing, discrimination

Telephone: 0800 144 8848 – Adviceline (England); 0800 702 2020 – Advicelink (Wales) (Mon-Fri 9am–5pm)

Chat service: <https://www.citizensadvice.org.uk/about-us/contact-us/contact-us/chat-service-money-and-debt/>

Website: <https://www.citizensadvice.org.uk/>

- **Debt Advice Foundation** – specialist debt charity offering free, confidential advice on any aspect of debt

Telephone: 0800 043 4050 (Mon-Fri 8am–6pm)

Website: <https://www.debtadvicefoundation.org/>

- **Money Helper** – free guidance on all aspects of money including money troubles (a government service, was Money Advice Service)

Telephone: 0800 138 7777 (Mon-Fri 8am–6pm)

Webchat: <https://www.moneyhelper.org.uk/> (Mon-Fri 8am-6pm; Sat 8am-3pm)

Website: <https://www.moneyhelper.org.uk/>

- **National Debtline** – free and confidential advice on debt from a charity run by the Money Advice Trust. Supporting people in England, Wales and Scotland.

Telephone: 0808 808 4000 (Mon-Fri 9am–8pm; Saturday 9:30am-1pm)

Website and Webchat: <https://www.nationaldebtline.org/>

- **StepChange** – debt charity providing free debt advice online

Telephone: 0800 138 1111 (Mon-Fri 8am-8pm; Sat 8am-4pm)

Website and Webchat: <https://www.stepchange.org/>

- **Shelter** – free information, support and advice to people facing homelessness or experiencing housing issues

Helpline: 0808 800 4444

Website: <http://www.shelter.org.uk>

- **The Trussell Trust** – nationwide network of food banks providing emergency food and support

Telephone: 01722 580180

Website: <https://www.trusselltrust.org>

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- **Universal Credit (UC) helpline** – advice on Universal Credit

Helpline: 0800 328 5644

Website: <https://www.gov.uk/universal-credit/contact-universal-credit>

Personal and emotional support

The organisations below can provide you with personal and emotional support:

- **Samaritans** – free and confidential emotional support if you need to talk

Helpline: 116 123 (24 hours)

Email: jo@samaritans.org

Website: <https://www.samaritans.org/>

- **Mind** – a mental health charity with a wealth of information on mental health conditions and services

Infoline: 0300 123 3393 (Mon-Fri 9am-6pm)

Website (national Mind): <https://www.mind.org.uk/>

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E.3 Aftercare Leaflet: People affected by the gambling of others

Thank you for taking part in an interview with us about your experience of the ban on using credit cards to fund gambling and how it may have affected you as someone who knows or is close to a gambler. We are very grateful for your participation, which will help us understand how the credit card ban has affected family and friends of gamblers, whether there have been any changes to the person's pattern of gambling, or any other ways in which the ban has affected you. We hope that your experience of taking part was positive.

For some participants, discussing their experiences may be upsetting or distressing. We want to ensure that you have the contact details of organisations who you can talk to and who can help you. We provide a copy of this leaflet to all participants to ensure that everyone has the resources to seek help and support if needed.

Support for problem gambling – for anyone worried about their or someone else's gambling

- **National Gambling Helpline** – confidential advice, support, and information on problem gambling (support provided by the National Gambling Treatment Service network and GambleAware)
-

Helpline: 0808 8020 133 (Freephone 24 hours, 365 days a year)

Website and Live Chat: <https://www.begambleaware.org/>

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Email: gambling.cnwl@nhs.net

Website: <https://www.cnwl.nhs.uk/services/mental-health-services/addictions-and-substance-misuse/national-problem-gambling-clinic>

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Website and Live Chat: <https://www.gamcare.org.uk/>

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Chat service: <https://www.citizensadvice.org.uk/about-us/contact-us/contact-us/chat-service-money-and-debt/>

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Website: <https://www.debtadvicefoundation.org/>

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Telephone: 0800 138 7777 (Mon-Fri 8am–6pm)

Webchat: <https://www.moneyhelper.org.uk/> (Mon-Fri 8am-6pm; Sat 8am-3pm)

Website: <https://www.moneyhelper.org.uk/>

- **National Debtline** – free and confidential advice on debt from a charity run by the Money Advice Trust. Supporting people in England, Wales and Scotland.

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- **StepChange** – debt charity providing free debt advice online

Telephone: 0800 138 1111 (Mon-Fri 8am-8pm; Sat 8am-4pm)

Website and Webchat: <https://www.stepchange.org/>

- **Shelter** – free information, support and advice to people facing homelessness or experiencing housing issues

Helpline: 0808 800 4444

Website: <http://www.shelter.org.uk>

- **The Trussell Trust** – nationwide network of food banks providing emergency food and support

Telephone: 01722 580180

Website: <https://www.trusselltrust.org>

- **Universal Credit (UC) helpline** – advice on Universal Credit

Helpline: 0800 328 5644

Website: <https://www.gov.uk/universal-credit/contact-universal-credit>

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For any queries about this research please contact the NatCen research team at ccban-project@natcen.ac.uk or call Crescenzo Pinto on XXXX.

