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Layla Moran MP  
Chair of the Health and Social Care Select Committee  
House of Commons  
London  
SW1A 0AA

24 April 2025

Dear Ms Moran,

I am writing in my capacity as Chief Executive of GambleAware, following the Committee's recent oral evidence session on gambling-related harms. We very much welcome the Committee's interest in this important public health issue, particularly at this critical time for the sector as the new statutory industry levy for gambling harms research, prevention and treatment (RPT) is introduced and we transition to the new RPT system.

As you may be aware, GambleAware is the leading independent charity and strategic commissioner of gambling harm prevention and treatment across Great Britain. We are working closely with the new commissioners to affect a smooth handover to the new RPT system in April 2026. We play a vital leadership role as convenor of the system, working closely with Government, regulators, the statutory sector, the third sector and those with lived experience to deliver a coordinated whole system approach to tackling gambling harms. We are evidence-based, and we pride ourselves on our robust governance process which ensures independence from the gambling industry.

Given our expertise on many of the issues discussed during the oral evidence session, I wanted to write to provide some additional clarity on some of the points raised, which I hope will be useful as the Committee takes forward any further work on gambling harms. I also wanted to respond to inaccurate claims made during the session about GambleAware's independence.

On this latter point, I want to be clear that GambleAware is entirely independent from the gambling industry. Members of our independent Board of Trustees are leaders across the NHS, public health and third sectors and have no connection to the industry. This independence was reinforced last year by the Charity Commission which noted it was assured of our independence from the industry and satisfied that our funding source (under the current system whereby gambling harms RPT is funded by voluntary industry donations) has no impact on our decision-making.

## Research independence

With regards to our approach to research specifically, as raised in the session, the gambling industry has absolutely no input at any stage of GambleAware's research commissioning, delivery or publication process. To be perfectly clear, we do not engage with the gambling industry to discuss or consult on any aspect of our work. The gambling industry has no insight into any of GambleAware's research plans and outputs beyond what is in the public domain.

Our research priorities are set in accordance with our organisational strategy in order to provide the evidence required to support a public health approach to preventing and reducing gambling harms. Research grants are awarded through open competition with calls for proposals published on our website. Applications are scored against transparent assessment criteria (which are published in advance), and funding decisions are determined through moderation panels including external subject matter experts as well as people with lived experience of gambling harms.

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GambleAware also has an established [review process](#) for all published research reports, in order to ensure rigour and quality. This includes external peer review by independent subject matter or methodological experts.

In recent years we have awarded funding to a wide range of academic institutions and reputable research organisations including (but not limited to) the University of Bristol, University of Plymouth, University of Wolverhampton, Bournemouth University, Liverpool John Moores University, Queen Mary University of London, University of Birmingham, University of Brighton, University of Sussex, Swansea University, NatCen Social Research, and the Behavioural Insights Team.

GambleAware will not have a role in commissioning research on gambling harms in the new RPT system, as UK Research and Innovation (UKRI) will be taking the role of Research Commissioner. However, it is important that these inaccurate, unsubstantiated comments about the independence and quality of GambleAware commissioned research are addressed, so that valuable existing research is not undermined or disregarded. Research on gambling harms in Great Britain is not expansive, and therefore all efforts to add to the evidence base through independent research should be welcomed.

## Campaign independence

As with our research activity, our treatment and prevention programme commissioning is also entirely independent of the industry. It was suggested during the evidence session that there is a need for research on public education campaigns to ensure they are evidence-based and independent from the industry. I would like to reassure the Committee that all of GambleAware's vital campaigns are fully evidence-based and are developed with no input from the industry. This is also true of our school-based education programmes, such as the Scottish Gambling Education Hub which has been independently evaluated and found to increase young people's and practitioners' awareness of gambling harms, as well as their ability to identify the signs of gambling harms and their confidence in accessing or signposting to support.<sup>i</sup>

Indeed, all of our communications and campaigns are grounded in the principles of effective public health marketing. We take an insight-led and evidence-based approach to messaging, and all activity is rigorously tested amongst the target audience, affected others and experts by experience. Our campaigns are also independently evaluated, and results are published on the GambleAware website, alongside other research synopses and evaluation reports.

Our recent stigma campaign has been particularly successful. It emphasises that gambling harm is caused by gambling, rather than being the individual's fault, and achieved strong engagement. 94% of the target audience cited that they took action as a result and calls to the National Gambling Helpline saw a 9% increase. Independent academic research also found it to be the **only** harm reduction advert studied to yield significant decreases in gambling urges.

We are working closely with the Office for Health Improvement and Disparities (OHID) on the transition of this campaign work as they take on the role of Prevention Commissioner. We hope that our important work, including our [recent study](#) into best practice in safer gambling messaging and campaigns, will inform their approach to future prevention activity.

## Ensuring the success of the future gambling harms RPT system

During the session there was discussion of the transition to the new RPT system. As the leading charity in Great Britain working to keep people safe from gambling harm, GambleAware very much welcomes the

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introduction of the statutory industry levy. We have consistently campaigned for its introduction as an important means of ensuring sustainable, transparent and long-term funding for gambling harms RPT.

GambleAware commissioned services, including via the National Gambling Support Network (NGSN), research, education, training and local prevention activity, have had a major impact over the years. We believe it is essential that the future system recognises and sustains the impact of this invaluable contribution and the existing expertise in the third sector and wider lived experience community.

- **Maintenance of the third sector's expertise in the new system**
  - As was referenced during the session, the third sector currently provides the majority of gambling harms prevention and treatment services. It is therefore imperative that the third sector continues to play a central role in the future RPT system, to ensure that this specialist knowledge, expertise and experience is not lost.
  - We are also keen to emphasise that current receipt of voluntary industry funding does not equate to influence of service development and delivery. The current voluntary funding arrangement was determined by Government. Whilst we have never supported this approach, and long-called for a statutory levy as a means to create a mandatory funding model, the voluntary funding model is the only way that organisations delivering vital services outside of the NHS have been able to access funding to date.
  - Ill-informed statements about the independence of third sector services are highly concerning as they ultimately impact service users, risking them turning away from services or not seeking support when they need it.
- **Criticality and value of GambleAware's core prevention programme assets**
  - In line with the need to sustain the expertise of the third sector, it is also important that GambleAware's important assets are transferred into the new system.
  - Prevention and early intervention are critical to reducing the risk of people experiencing gambling harms. To achieve this, it is essential people have a trusted voice they can turn to for support, which is accessible and reduces the need for more complex and costly interventions. The GambleAware brand and prevention programme assets play this critical role in Great Britain.
    - The GambleAware brand is central to the current system, enabling a seamless user journey from prevention through to treatment services. Strong awareness (58%), trust (61% of those experiencing any level of harm PGSI 1+) and warmth (53% of those experiencing any level of harm PGSI 1+) of the brand is crucial for encouraging people to take action.
    - The GambleAware website also serves as a central digital hub for comprehensive advice, tools and support for around five million people each year. For example, the self-assessment quiz has been completed over 160k times, with over half of those completing the tool taking meaningful action as a result. The spend-calculator tool, which has a 62% completion rate, gives users an assessment of the time and money they are spending on gambling.
  - It is vital that these assets are maintained and that clear information on future commissioning plans is provided to the system to enable a smooth and uninterrupted transfer of these critical assets.
- **Lived experience representation in the new system**
  - We are also calling for the lived experience community to be central to informing the strategy and activities of the future RPT system. The Government must be clear on how it will formalise a role for the full breadth of lived experience representation to provide insights to: DCMS as it sets strategic direction; the Levy Board as it ensures the delivery of commissioning objectives; and the three commissioners as they carry out their responsibilities.

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## **Reducing exposure to gambling, and communicating the risks associated with it, must be prioritised**

It is vital that the new system places equal focus on prevention, alongside treatment services. Prevention and early intervention are critical to helping people before the gambling harms they are experiencing become too serious.

A critical element of this approach is reducing exposure to gambling advertising, which is contributing to gambling being a part of everyday life. This was raised during the evidence session and we are particularly concerned about the impact on children and young people (CYP), as GambleAware research has found stark evidence of exposure to gambling marketing for CYP:

- Almost all (96%) of 11-24-year olds surveyed had awareness of any types of gambling marketing in the previous month. In contrast, only 38% were aware of any health information or warnings on gambling adverts.<sup>ii</sup>
- When shown a list of 10 major gambling brands, CYP respondents had heard of more than seven on average.
- In further GambleAware research, CYP described their online spaces as ‘saturated’ with gambling, gambling-like content and advertising. They felt it was part of their everyday life.<sup>iii</sup>
- Concerningly, the bright, loud and eye-catching nature of gambling adverts drew CYP in – with content from influencers and footballers identified as a potential pathway.

There is evidence of a link between exposure to advertising and attitudes towards gambling, including amongst CYP:

- People experiencing gambling harms are 40 times more likely to spend more money and time gambling as a result of seeing gambling advertising, compared to those without any problems.<sup>iv</sup>
- A systematic review of literature showed a potentially causal relationship between exposure to gambling advertising and more positive attitudes to gambling, a greater intention to gamble and increased gambling activity. The evidence of impact was stronger for CYP and those already at risk of harm.<sup>v</sup>
- Recall of gambling adverts amongst 13-25 year olds is positively associated with gambling frequency. Those with the greatest advertising exposure were 2.3 times more likely to experience “problem gambling” in their lifetime.<sup>vi</sup>

Measures need to be introduced to address these concerning statistics and ensure Great Britain does not fall even further behind its European counterparts in regulation on gambling advertising. A recent report commissioned by GambleAware, and conducted by the University of Bristol and Ipsos, found our regulation is currently the most lenient in Europe.<sup>vii</sup> This is despite Great Britain having amongst the greatest amount of research on gambling harms than other countries.

GambleAware has identified three key prevention-mindset policy measures for the Government to take forward to reduce exposure to gambling and effectively communicate the risks related to it:

- **All gambling marketing to include independent evidence-led health warnings with effective signposting to support**
  - Gambling operators have a duty of care to ensure that their marketing clearly communicates the risks from participating in gambling and signposts the public to where they can access support if needed. This is central to the preventative, precautionary approach required for gambling harms.
  - One Committee member questioned whether the industry’s tagline, “When the fun stops, stop”, is effective. Recent research commissioned by GambleAware supports wider evidence collected

to date on the ineffectiveness of industry safer gambling messaging. In particular, the industry's 'Take Time to Think' (TTTT) tagline was found to be too generic, does not relate to gambling or gambling behaviour and places responsibility on the individual.

- Based on this, GambleAware is recommending the use of three new health warnings ("Gambling comes at a cost"; "Gambling can be addictive"; "Gambling can grip anyone"), which should be shown in adverts and be visually clear to consumers.
- **A ban on gambling marketing at sports events (including removal of sponsorships from sports clothing, merchandise, and wider stadium)**
  - Exposure is driven in large part through the deeply embedded links between gambling sponsorship and advertising in sports, with sports events being the fourth highest channel for advertising awareness among CYP.<sup>viii</sup>
  - The commitment from the Premier League to ban front of shirt sponsorship clearly highlights an increased awareness of gambling harms and is a step in the right direction. However, this needs to be expanded to all sports clothing, wider purchased items and other in-ground advertising for gambling brands.
- **Pre-watershed ban on all broadcast gambling advertising**
  - CYP are most likely to report having seen gambling advertising on TV compared with other channels.<sup>ix</sup> In just one Premier League weekend there was found to be almost 7,000 gambling messages observed during the broadcast of just six games.<sup>x</sup>
  - Public surveys have indicated support for watershed limits to reduce exposure to gambling, and this move would see GB following similar steps by other countries including Ireland, Germany and Australia.<sup>xi,xii,xiii</sup>
  - Legislation to include the wide range of gambling types and advertising types must be introduced to address the lack of impact that industry self-regulation has had.

We hope this additional information is helpful to the Committee's work on this important topic. We would be delighted to support this work through the provision of any further information or a meeting with the Committee to discuss these critical issues further.

Yours sincerely,

**Zoë Osmond OBE** | Chief Executive Officer

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<sup>i</sup> Scottish Gambling Education Hub Evaluation Final Report, March 2022 [https://www.gambleaware.org/media/zecf1e5y/sgeh-evaluation-final-report\\_0.pdf](https://www.gambleaware.org/media/zecf1e5y/sgeh-evaluation-final-report_0.pdf)

<sup>ii</sup> The effect of marketing and advertising on children, young people and vulnerable people Quantitative Research Report [https://www.begambleaware.org/sites/default/files/2020-12/the-effect-of-gambling-marketing-and-advertising\\_quants-report.pdf](https://www.begambleaware.org/sites/default/files/2020-12/the-effect-of-gambling-marketing-and-advertising_quants-report.pdf)

<sup>iii</sup> Qualitative Research on the Lived Experience and Views of Gambling among Children and Young People. [https://www.gambleaware.org/media/dbwdbdxk/exploring-the-lived-experience-and-views-of-gambling-among-children-and-young-people\\_final\\_0.pdf](https://www.gambleaware.org/media/dbwdbdxk/exploring-the-lived-experience-and-views-of-gambling-among-children-and-young-people_final_0.pdf)

<sup>iv</sup> GambleAware (2024), Three quarters of fans are concerned about the amount of gambling advertising and sponsorship around football, survey finds. Available at: <https://www.gambleaware.org/what-we-do/news/news-articles/three-quarters-of-fans-are-concerned-about-the-amount-of-gambling-advertising-and-sponsorship-around-football-survey-finds/>

<sup>v</sup> What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature <https://www.sciencedirect.com/science/article/pii/S0033350622003420>

<sup>vi</sup> The Effect of Gambling Marketing and Advertising on Children, Young People and Vulnerable People. Literature review <https://www.begambleaware.org/sites/default/files/2020-12/Gamble%20Aware%20Report%201%20ISM%20%28Revised%20May%202019%29.pdf>

<sup>vii</sup> Ipsos, University of Bristol and GambleAware. Drivers of Gambling Marketing Restrictions – An International Comparison. <https://www.gambleaware.org/our-research/publication-library/articles/drivers-of-gambling-marketing-restrictions-an-international-comparison/>

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viii Young People and Gambling 2023 <https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-2023/ypg-2023-attitudes-towards-and-exposure-to-gambling>

ix Young People and Gambling 2023 <https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-2023/ypg-2023-attitudes-towards-and-exposure-to-gambling>

x The Prevalence of Gambling Adverts during the Opening Weekend of the English Premier League 2023/2024. <https://www.bristol.ac.uk/media-library/sites/business-school/documents/BRISTOL-UNI-GAMBLING-Report2023-2.pdf>

xi Minister Weerwind bans untargeted advertising for online games of chance <https://www.government.nl/latest/news/2023/04/19/minister-weerwind-bans-untargeted-advertising-for-online-games-of-chance>

xii The Prevalence of Gambling Adverts during the Opening Weekend of the English Premier League 2023/2024. <https://www.bristol.ac.uk/media-library/sites/business-school/documents/BRISTOL-UNI-GAMBLING-Report2023-2.pdf>

xiii Consumer attitudes towards gambling advertising (2019 research) <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/consumer-attitudes-towards-gambling-advertising-2019-research>