

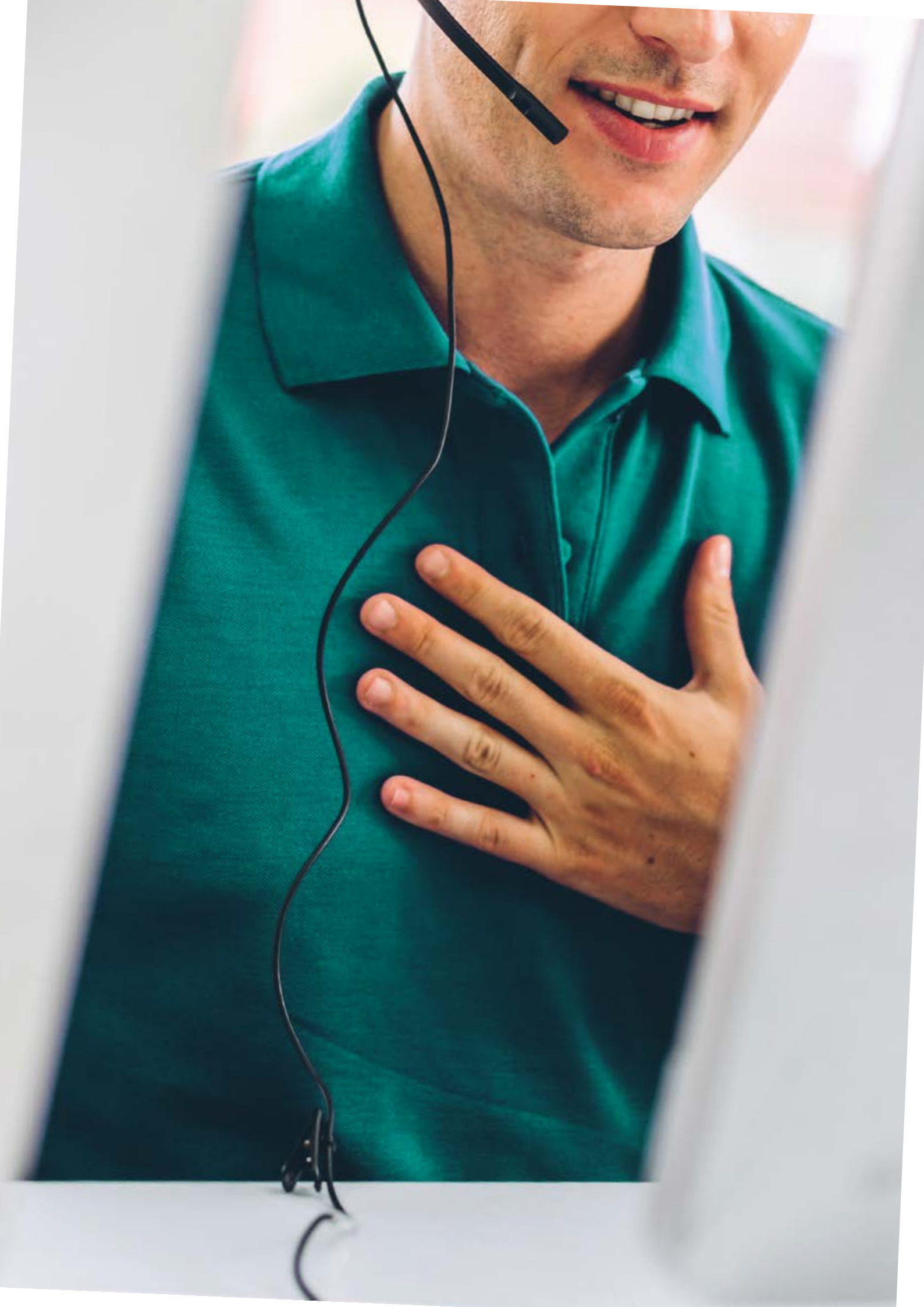


Bank customers experiencing gambling related vulnerabilities and harm: **Exploring an ethics of care**

Toolkit of recommendations for gambling support
July 2022

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Project aims and objectives



1

Consider the proactive identification of customers experiencing gambling related vulnerabilities & harm.



2

Explore the ethics of care regarding banks providing support to customers experiencing gambling related vulnerabilities with current gamblers, family members of those who gamble, & community stakeholders.



3

Co-design of a gambling support program for bank customers.



Project design



Stage 1

Literature Review



Stage 2

Narrative Interviews*

*current gamblers, family members, stakeholders (e.g. mental health, relationship, and financial counsellors, gambling support service providers)



Stage 3

Co-design workshops

FINDINGS

Drivers of Gambling Harm



Culture & cultural background

“We don’t really talk about it, but I know gambling is...banned in China... my dad kind of had...a bit of a tendency maybe. It kind of escalated more and more after we moved here”

20–29-year-old female, family member (father is a gambler)



Social normalisation

“Just started going to the pub, like go to the pub with your mates, “Oh, I’m gonna have a slap.” You know? It’s the culture. It’s Aussie pub culture.

30–39 year-old male, family member (sister, brother & mother are gamblers)



Peer influence

“...there were certain people like my barber, for example, he used to be really, really bad with gambling. So, him and I would always meet up, and we meet up at the pub and we’d just pump money through, pump, pump, pump it through, you know. I recognized quite early on as like a dangerous influence, because it was almost like a competition, you know... So, I’ve got to get more money out now to, you know, keep up sort of thing

20–29 year-old female, high-risk gambler (Electronic Gambling Machines (EGMs), sports betting)



Relationship & family problems

“So, if the female could get out of the abusive relationship, then she could look at managing her gambling problem. Because she’s seriously gambling to cope with DV relationship.

Stakeholder interview, Community social service provider

FINDINGS

Drivers of Gambling Harm



Financial windfalls →

“ So, uh, it could be that it’s insurance related. Someone has a car accident. They get compensation... they get a lump sum....it could be someone having had...an operation and something goes wrong and they... fought a legal case and they’ve got compensation for... that accident...it could be that your house burns down and you get an insurance payout...in a lump sum, and that’s get dissipated. or...an inheritance. Superannuation... have gone to...gambling.

Stakeholder interview, Financial counselling service



Gambling capitalism/industry →

“ I have a mixed, uh, mixed feelings towards it, I guess. I get where they’re coming from in terms of promoting their brand or their, you know, their company...but I think it’s a bit, it’s a bit rich then also to sort of try to tell people to gamble responsibly or to offer them help if they can’t, you know, gamble responsibly because of the advertising that’s being pushed in people’s faces. And...you know,...there’s so much of it. Because it’s so in your face, I guess, it’s just, you know, it detracts from actually watching a game of football.

40-49 year old male, family member (brother is a gambler)



Marketing →

“ And so, ...there’s a lot of advertising for gambling. And so, I think he became,...aware of that and sort of, and so he started off small, ...but then sort of, ...you know, that increased... but I think there was...an issue in actually...knowing when to stop.

40-49 year-old male, family member (brother is a gambler)



Financial problems →

“ You know, they are working hard, because you know, I met some people working hard for 30 years, the company just shut down. They don’t have any other skills, and the work environment moves so fast, they just didn’t know what to do, so they [start] drinking and go to the pub and start gambling.

30-39 year old male, family member (sister, brother & mother are gamblers)



Trauma →

“ The main driver [of problem gambling] is trauma. So,... I’ll say to the client,... “There’s potential that there’s some sort of trauma in your background that might be related to this,” and I’ve had clients literally burst into tears. And then.... I have to get intervention straight away, ‘cause some of them, like, literally fall apart. So,and a lot of them didn’t realize that that was the trigger for it.

Stakeholder interview, community legal service provider

FINDINGS

Drivers of Gambling Harm



Addiction

“ No, I just like the pokies. I’d marry them if I could. Like I just like, it’s stupid because I like them, but I hate them. Like I hate them with a vengeance and wish I’d never ever touched them, but I love them because I suppose I’m addicted to them.

50-59 year old female, high-risk gambler (EGMs)



Mental health

“ And you, and you know what, I went there, um, I went there probably less than a month ago to be honest because, uh, you know, I had a, I had a, I had a #\$\$@& night and, um, and I just got there, um, because playing the pokies makes me feel good when I’m doing it.

30-39 year old male, high risk gambler (EGMs, sports betting)



Escapism

“ Escapism ...so some days when I have like a free day, I’ll go, “Geeze, my house is a tip. I’ve got to unclutter, declutter, sort all that stuff out, pack that away, sell that.” And then I go, “#\$\$@& it. It’s all too hard. I’m just going to the pokies.” And that’s kind of... I just go there then ‘cause I don’t wanna deal with the stuff I’ve gotta deal with.

50-59 year old female, high-risk gambler (EGMs)



Family enablers

“ So, my mum does all the numbers and everything. She picks numbers and she gives my dad... a little book with papers in it and then he goes and buys them and gives it to her...she doesn’t manage her own money, so he would have to buy it anyway for her... I would say he pretty much goes along with most things that she says.... I guess my dad has to literally go whenever she wants and all that stuff.

20-29 year old male, family member (mother is a gambler)



The thrill of winning

“ Yeah, and I think the thrill of... you know, initially having a win and stuff like that on a couple of smaller investments, and then, uh, you know, “I can probably, you know, try to- to win more,” or, “I can, you know, keep going and stuff like that to sort of, to keep the adrenaline rush going.

40-49 year old male, family member (brother is a gambler)



Clandestine way of risk taking

“ Like you know I’ve been able to just like hide it for so long as well.

30-39 year old, female, high risk gambler (sports betting)



FINDINGS

Outcomes from Gambling Harm



Relationship
problems

“ She (ex-Wife)... she didn't mind me winning... but what was really surprising, and I only heard this a month ago from, from her... where she'd launched into a bit of a tirade about another topic, but it was the first time she then said to me that I had a gambling problem. And she never said that for the whole 11 years we were married...

40-49 year old male, high risk gambler (sports betting)



Harm to families

“ My mum's still here, still around, so my father's not... but yeah, my mum was equally... concerned. She has a different relationship with him... a bit more closely than what I would I guess. He's a bit more closer to her. So she was very worried and, you know, about what the impacts of what he was doing, and how that, were affecting him and, I guess, her relationship with him as well... I then had my wife and I talking, me talking to my mother, you know, it was a bit of a whole circle, I guess.

40-49 year old male, family member (brother gambles)



Mental health
harms

“ Um, so, yeah, when I, when I lose, I generally have, you know, \$10 left. I'm like, “#&,” so I just buy a pint and sit there going, like, just, you know... Going off on myself. Like, you know, like, obviously in my head, I'm like, “You idiot. You #&!# idiot. Like, why? You done it again.”

18-29 year old male, high risk gambler, EGMs

FINDINGS

Outcomes from Gambling Harm



Physical health
issues

“ I also don't like the fact that I don't feel that... gambling is good for my health either, in that times go spend gambling is time that I potentially could be exercising. And... you know, looking after my health better.

Female, 40-49 years old, high-risk gambler (EGMs)



Lost time &
productivity in
work & life

“ That's right, and... even for people who have money to gamble cause...there's money there... and they're using it for gambling... but they don't, don't spend time with their family or friends or whatever and that's all they do...they don't have any other hobbies or, or they don't sort of direct their life in any other way.

Stakeholder interview, relationship counsellor



Financial hardship

“ He didn't want me to find out that we were behind and why we were behind, because he'd started gambling... Yeah. The house was getting repossessed the next week... I actually had a settlement the same week that he came out and told me about the house... he knew all about the settlement, yeah... So, about a huge chunk of that went on the house... but unfortunately, it then went to him and he gambled that... in less than a week, he gambled \$18,000.

30-39 year old female, family member (husband is a gambler)



Domestic violence

“ Absolutely. Yeah, because... I guess it's something more tangible that you can see... particularly domestic violence and often the gambling can be the underlying factor around those things... but, you know, for our clients and for our clinicians often, there's that kind of missing link there that this is what could be causing the problem... so if we talk about it as being connected to those things, it becomes part of the picture. It's not like this separate taboo thing that we don't talk about.

Stakeholder interview, Addiction support counsellor



Criminality

“ The problem gambling issues are becoming for... each individual problem gambler... more complex. The problem gamblers present with very complex issues, they're not straightforward. They have a multitude of legal issues... when it comes to problem gambling... and it is increasing significantly.

Stakeholder interview, Community legal service provider



FINDINGS

Barriers to Accessing Support



Stigma

“ Stigma. Yeah... it’s like really normalised in Australian culture... and I think if you seek support for it, it’s kind of just like really, there’s a really big stigma around it... I’m not likening it to like mental health stuff, but there’s also like a really big stigma around that. It’s like if you speak about it like, you’re weak and you can’t get over yourself.

18-29 year old female, family member (father is a gambler)



Resources

“ So, they’d chat with [my husband]. A couple times he had a session to talk with them about actual gambling itself... Then, it was over... he just didn’t end up making any more appointments because the main person he was seeing left. And then, he had trouble getting an appointment a few times after, that he tried. And then, he gave up, because he’s not one to really constantly put his hand out, for kind of, help.

30-39 year old female, family member (husband is a gambler)



Social anxiety

“ I haven’t actually ever been to like... gamblers anonymous or anything but I have been looking it up like only in the last week... I know like the time it’s on and where it is and, and I think it’s about me taking that step to get there basically... I do get a lot of social anxiety too. So sometimes going into those sessions like, is a really big step for me to do too.

30-39 year old female, high-risk gambler (sports betting)

FINDINGS

Barriers to Accessing Support



Lack of clear pathways

“ There needs to be a plan for how to prevent harm and clear pathways for referral – people often don’t have these just now

Co-design workshop participant



Individual responsabilisation

“ It’s like you hear about it but you’re like, “How’s that gonna help me in terms of like what do you, what do you guys do” like I expected this helpline and stuff like that, but he said you talk me through it as if you put me like, like a plan in place or what they take a bit of promotion from them. Like there’s always like the big responsible gambling fan that actually which I hear about a lot from work and stuff like that but it’s like, what’s that really do?

20-29 year old male, high-risk gambler (sports betting)



Lack of funding, poor service availability & responsiveness

“ Well, I, I mean we all know that we’re on short-term funding... so, you know, my job could, could end when the funding ends. And if the funding agreement, which is only for a year, either at the end of that year you’re still going to have the same employer or that employer’s no longer going to have the funding to keep you on the books so you know, you’re out of work which is... I don’t know, it’s a very difficult model, particularly for younger staff, you know?

Stakeholder interview, Community charity

Should Banks Intervene?

Overall, we found strong and consistent support for banks to intervene and provide support to gambling hardship customers. It is felt that this is the right thing to do ethically and morally, and would demonstrate a commitment to social responsibility.



Ethics

“...I think when there are issues that are impacting, the bank should put that as their corporate and social responsibility to talk about those things openly... You know, there’s nothing stopping them in just putting, you know, some fact sheets. Or, you know, something on their website that meets... that obligation, I suppose... and they have the most data available after... the gaming venues in terms of, you know, what their customers do. What transactions are passing through the accounts. And they can actually be the first ones to put some measures in place.

Stakeholder interview, financial counsellor



Social responsibility

“I think they can play a huge part... like they can easily flag like fraudulent charges and things like that. Surely, they’re seeing lots of gambling charges, surely they can flag that... yeah, and do something.

30-39 year old female, family member (husband is a gambler)

However, we did also identify that banks should proceed with some caution and carefully consider issues relating to civil liberties and individual freedoms, as well as data privacy.



Civil liberties & individual freedom

“I don’t think that the bank should cut off someone’s finances and say, “no you can’t spend your money.”... I think it would be fine if they sent him a notification. But it would be wrong if it prevented him for doing the transaction.

18-29 year old female, family member (father is a gambler)



Privacy

“I think you need to tackle the issue where... you don’t come across to people as snooping and you come across the community as one whose there for support. So, instead of going to each individual that might be overdrawing money or overusing things... maybe having like a blanket ad or poster or flyer that goes out for support or you know, having some sort of marketing message for support would probably be a proper first line... it might create... an immediate barrier if you contact someone individually and be like, “Hey you know, we’re noticing that you’re using a lot of money on, on the casino.”... like, one person might be like, “Why on Earth are you tracking my expenses,” right?

20-29 year old female, low-moderate risk gambler (casino)

Things to be aware of in providing support



Acknowledge the complexities

“ Problem gambling issues are becoming for each individual problem gambler more complex. The problem gamblers present with very complex issues, they’re not straightforward

Stakeholder interview, Community legal service provider



Be trauma informed

“ So people might have a deep-seated trauma that they’ve had from their childhood, that’s impacted all of these things in their life. And then you got to deal with the trauma before you can deal with the gambling issue, if that makes sense. So some people are gonna have a long-term thing. I think one of the things that’s worked well is... a lot more investment in prevention.

Stakeholder interview, Government gambling policy organisation



Work from an intersectionality perspective

“ There’s a lot of interesting research actually... about how cultural and ethnic minorities are more likely to experience harm... and, you know, problematically, there, there are less... you know, mechanisms or support services for them in Australia.

Stakeholder interview, Gambling counsellor



Don’t exacerbate the situation

“ Banks, a lot of times, are really not supportive... they push clients to pay... they always scare my clients by sending all these letters that they look like... court letters or you know. And... because my clients, English is their second language. For them, it’s, you know, really hard to interpret what that means.

Stakeholder interview, Gambling counsellor



Language, framing & messaging

“ It has to be very approachable language because if you are guiltig people, if you are you know, saying anything that seems like an attack. So... you have to be very sensitive in your language and very, very approachable”.

20-29 year old male, family member (mother is a gambler)

Effective communication approaches



Be respectful and non-judgemental

Avoid stigma or judging people's actions. Instead create a sense of safety and reassurance that it is okay to talk things through.



Use sensitive and approachable language

Avoid referring to people as a gambler or a problem gambler or referring to addiction – but relate to them as a person who happens to gamble. Avoid calling people vulnerable – better to say that someone may be experiencing vulnerabilities.



Listening is key

Make people feel heard and then act in support.



Reassurance

Assure customers that the bank is here to help not to judge, punish or compound the issue.



Acknowledge that gambling is a societal issue

Gambling affects lots of people, and it affects the community and society at large. This is not just a personal problem that is the fault of the individual, it is a shared problem that we can tackle collectively.



Storytelling can be effective

Share stories about other customers who have received support and benefitted from this.



Understand the context

Check with customers about other complex issues (e.g. DV, mental health, financial stress) that may coincide with gambling and refer for appropriate wraparound support.



Acknowledge intersectionalities

Customers' experiences may be shaped by intersections of gender, class, race, (dis)ability etc. These factors should be acknowledged in communication. Consider in-language communications for people from CALD backgrounds.



PRIORITY RECOMMENDATION

Ongoing screening & monitoring

Aim and rationale

To flag customers whose transactions suggest they are engaging in harmful gambling, and intervene. We recommend this because banks hold data that could identify, help intervene and support gamblers.

Features and characteristics of the recommendation

Data screening and monitoring, development of algorithms, set parameters for flagging accounts, appropriate intervention activities e.g customer communication and follow-up (telephone call, email, messaging, in-app, combination of these), provision of support.

Timing

Within the next 1-2 years.

Resources required

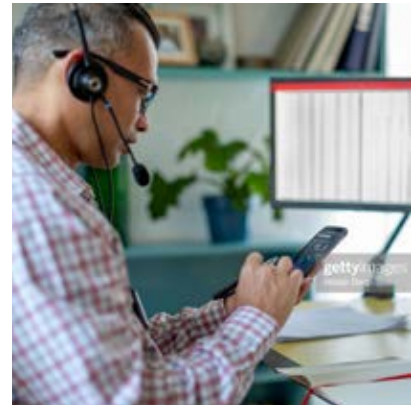
Legal advice, tech support for algorithms and flagging accounts, staff training on intervention touchpoints and support pathways, data management tools and software, communication resources, partnerships with appropriate support services.

Target Segment(s)

Gamblers, families harmed by gambling.

Value benefit

Enables banks to more proactively support customers experiencing gambling harm, can help customers avoid defaulting on debt.



“ For those people who haven't admitted that they have a gambling problem, I think that's a little bit harder for... bankers to tackle, I guess. I think it should be more, like... very subtle. Like... for instance, my bank, they provide me a summary statement on expenses that I've spent on. So they'll go, like, "I've spent this much on shopping in the month. I've spent X amount on groceries for the month. I've spent X amount, I assume, on entertainment." It could be a flag for people, partners and whatnot, on how much they've spent on entertainment, so gambling, for example. Which... that could make a red flag for someone.

Co-design workshop participant



PRIORITY RECOMMENDATION

Blocks & Restrictions

Aim and rationale

To prevent gamblers from experiencing harmful expenditure on gambling, and to limit frequency. We recommend this because our participants strongly called for these blocks and restrictions.

Features and characteristics of the recommendation

Features including in-app buttons, website function, and telephone services to enable bank customers to place blocks and restrictions on accounts and credit/debit cards 24/7. It should not be possible to remove blocks and restrictions for a minimum of 48 hours. Block removal is by calling the bank. Facility to place restrictions on ATM withdrawals, POLi payments, and Osko transfer payments to other accounts. Spending control tools, deposit limits, and withdrawal limits to prevent gambling expenditure. Opt-in feature to enable gambling expenditure for all bank account holders, rather than current opt-out approach. Access to gambling website blocking software such as Gamblock. Follow up with customers who request blocks and restrictions to assess need for and referral to appropriate gambling support services.

Timing

As soon as possible and ongoing.

Resources required

Amendment to banking app to support functionality, changes to policies and procedures/customer spending/account policies to enable, technological support and coding plus app development, staff to support these actions.

Target Segment(s)

Gamblers, families harmed by gambling.

Value benefit

Can stop gamblers losing control during gambling session, empower gamblers to self-regulate. Allow customers to save money and improve their financial well-being.



“ What all of the big banks have done is they’ve introduced... banking blocks, that users can put on. So at a certain point... whatever point a person wants... they can go onto the app, and turn on the banking block. They don’t have to speak to anyone, and they’ve had... massive, massive uptake. In...the past year... I estimate, from talking to the other banks, that 200,000 people... have put on the blocks.

Co-design workshop participant



PRIORITY RECOMMENDATION

Partnerships

Aim and rationale

Banks to partner, support and possibly cross-subsidise existing gambling support services in the community. We recommend this because banks can play a key role here in facilitating (not necessarily delivering) support services provided by existing suppliers who lack resources and capacity.

Features and characteristics of the recommendation

Banks able to refer gambling hardship customers to relevant services (e.g., mental health services, financial literacy, counselling), as needed. Helps to provide multiple pathways and touchpoints for customers to access support. Funding and subsidies for support services that lack capacity.

Timing

As soon as possible and ongoing.

Resources required

Funding, establishment and maintenance of partnerships with key stakeholders and service providers, ongoing partnership workshops/ meetings. This study already established some connections to be possibly expanded in the future.

Target Segment(s)

Banks, gambling stakeholders, gamblers and their families.

Value benefit

Pool knowledge and resources to build capacity, provides customers with appropriate support, advance the knowledge and capabilities of banks in the customer hardship sphere.



“ Every year we have... community education... to try and increase the community's awareness and decrease... the normalcy... of gambling... it'll be great to partner during... our gambling... awareness week... which happens end of July... every year to... partner with... banks. 'Cause we, we sometimes have difficulty getting community organizations on board with us, even if it's just things like putting out...information, to... all customers or, you know, different projects we could work on together. So that would be a great thing for us.

Co-design workshop participant



PRIORITY RECOMMENDATION

Refine policies & procedures

Aim and rationale

To ensure that proper risk assessment, screening and prevention practices are undertaken for any banking products. To ensure transparent communication and knowledge sharing across joint accounts. We recommend this because there is evidence of financial abuse of joint account holders by a gambler, and because prevention is better than cure.

Features and characteristics of the recommendation

Updated banking policies and procedures, development of appropriate screening and risk assessment, and prevention practices including familiarising customers with relevant support services and pathways. Amendments to privacy policies for joint account holders, transparent communication, control and access to information across joint accounts for all account holders.

Timing

As soon as possible and should be maintained ongoing once developed.

Resources required

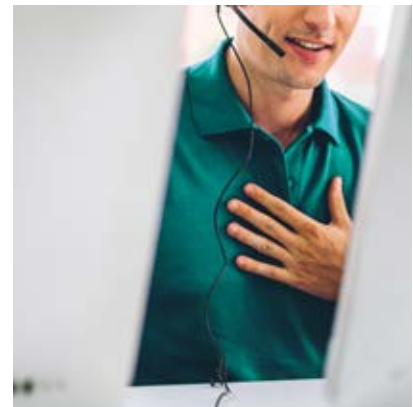
Bank staff to update banking policies and procedures, legal advice, communication support for account holders (e.g., messaging), materials on gambling support services to prevent harm, development of appropriate screening and risk assessment tools, staff training on gambling screening, risk assessment, referral to preventative gambling support services.

Target Segment(s)

All bank customers.

Value benefit

Reduced risk of customer defaulting, help avoid financial and domestic abuse that may be facilitated by existing banking policies and procedures, good corporate social responsibility.



“ My experience with couples... is often around a shock or a disclosure where the money has already gone. So for instance, one client shifted \$ 50,000 from their home equity into their gambling account. And that went on a weekend. Another one lost two inheritances... now these were joint accounts, but in neither case... was the spouse contacted at all... so I'm wondering if at the start of a joint account, could these types of things be... opted into?

Co-design workshop participant



PRIORITY RECOMMENDATION

Training

Aim and rationale

To train bank staff, adopting a whole-of-organisation approach, regarding the nature, complexities and characteristics of gambling harm and customers who may be experiencing it. We recommend this to familiarise & upskill bank staff, help identify customers experiencing gambling hardship & intervene, & enable a whole of organisation approach to tackling the issue.

Features and characteristics of the recommendation

Training about the drivers, impacts and outcomes of gambling, identifying the indicators of people who gamble or who are harmed by gambling and the intervention touchpoints and pathways, understanding how to provide appropriate support that acknowledges the complexities, is trauma informed and adopts an intersectional approach.

Timing

As soon as possible and every 1-2 years after.

Resources required

Facilitated trainers drawing on stakeholder partnerships, funding to pay for training resources (e.g., information and activity packs), budget for staff hours spent on training.

Target Segment(s)

All bank staff.

Value benefit

Improved customer care provision, ethical approach to harm reduction.



“ Agree with that... I think Suncorp needs to... destigmatize gambling. So not, not be judgmental. So maybe they're even talking about multiple forms of different forms... of spending. And one of them... is gambling... and... training staff... to normalize, getting help... to support people, getting help, not to be judgmental.

Co-design workshop participant



PRIORITY RECOMMENDATION

Social marketing

Aim and rationale

For banks to raise awareness about gambling harm as an issue, to familiarise customers that support is available, to help destigmatise gambling harm and hardship, to promote the value of non-gambling activities. We recommend this because gambling is often stigmatised, not openly talked about, and awareness of support – particularly from banks – is low.

Features and characteristics of the recommendation

Social marketing is a systematic and multi-level approach to behaviour change. The program should involve: (1) promotion and communication campaigns, (2) product and service development (e.g., serious games promoting responsible gambling, services promoting alternative leisure activities, and (3) advocacy and policy change

Timing

1-2 years.

Resources required

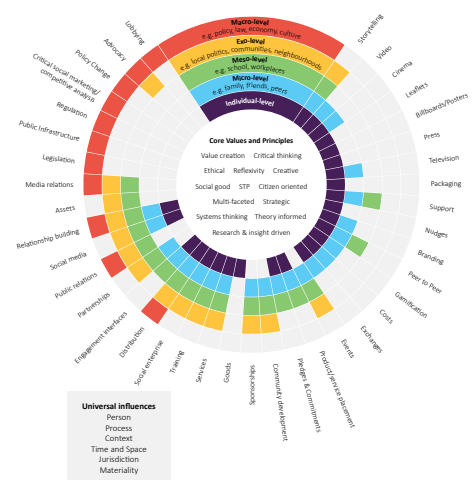
Funding, commissioning of social marketers.

Target Segment(s)

All customers, the general Australian community.

Value benefit

Raise banks' profile as active in the gambling support and customer hardship space, improved brand value, build ethical and social responsibility reputation, raise awareness and destigmatise gambling, improve uptake of gambling support provision, support and reinforce all of our other recommendations.



“ There’s a world of difference between wanting to stop and knowing you should stop. And that that’s where addiction comes in. And I think the bank has the capacity to go much wider in the community, just in marketing or in advertising, you know, things like, is someone else’s gambling making your finance, your life unmanageable. That way, the person knows... the web link or whatever or phone number and the person would have a lot more confidence... But I think we need to reach broadly the community. And that way someone will tap the gambler on the shoulder... and the bank would be seen to be very responsible - if they had a marketing campaign.

Co-design workshop participant

[Social marketing @ QUT](#)

Other Recommendations



Whole of organisation approach

Ensure all bank staff are aware of, & familiar with gambling hardship & what to do



Be trauma informed

Ensure safety, trustworthiness & transparency, provide peer support, collaboration, empowerment & give voice, acknowledge intersectionalities



Don't exacerbate the situation

Once gambling hardship customers are flagged employ a harm reduction rather than debt recovery approach



Provide multiple touchpoints

Ensure there are different entry points & pathways for accessing support in-person/in-branch, in-app, digitally, over the phone



Adopt an intersectionality approach

Be mindful of how customers' gender, race, ethnicity, class, illness, & (dis)ability might intersect to create hardship & should inform the support offered.



Financial literacy training

Provided for new bank clients, family members of gamblers, in-school programs.



Acknowledge the complexities

Life can be messy & complex, there are no easy fixes, & there will often be multiple underlying issues meaning that gambling hardship customers require wraparound and holistic support



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