

FAO: Nicholas Smith
RSE and PSHE team
Department of Education
Sanctuary Buildings,
20 Great Smith St,
Westminster, London SW1P 3BT

By email: PSHE-RSE.consultation@education.gov.uk

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Dear Minister,

Call for evidence: 'Changes to the teaching of Sex and Relationship Education and PSHE'

Guided by the National Responsible Gambling Strategy, GambleAware¹ is a national and independent charity committed to:

- broadening public understanding of gambling-related harm as a public health issue;
- helping build resilience, in particular in relation to the young and those most vulnerable to such harm; and,
- helping those that do develop problems get the support and help they need quickly and effectively.

We welcome the opportunity to contribute to the Department of Education's 'call for evidence'. In particular, we are concerned to address personal, social, health and economic education (PSHE), and to make the case for the inclusion of gambling and the associated risks.

Gambling behaviour of young people

In December 2017, the Gambling Commission published a report about gambling behaviours of young people aged between 11-16 years old in England, Scotland and Wales. The survey was conducted by Ipsos MORI².

The report found that 12% of 11-16 year olds had spent their own money on a gambling activity in the week prior to taking part in the study³. This equates to approximately 370,000 11-16 year olds. Gambling in the past week continues to be twice as prevalent among boys (15%) as among girls (7%). The most common activities are gambling on fruit machines (4% having spent money on this in the past week), private bets with friends (3%) and National Lottery scratch-cards (3%).

¹ See <https://about.gambleaware.org/>

² <http://live-gamblecom.cloud.contensis.com/PDF/survey-data/Young-People-and-Gambling-2017-Report.pdf>

³ This is 4 percentage points lower than in 2016, and represents a continuation of the longer-term decline seen since 2011, when 23% of 11-15 year olds in England and Wales had gambled in the past week. However, the number of children gambling online is similar to 2016.

The majority of 11-16 year olds who have gambled spent a relatively modest amount of £5 or less on gambling in the past seven days (64%), however a minority spent substantially more, with 8% claiming to have spent more than £40. Among those who had gambled in the past week, the average spend on gambling activities was £10 from an average disposable income of £28 (money given to them as pocket money or money earned in the past week).

The most common routes into gambling, in terms of the first activity that young people who gamble had ever spent money on, were fruit machines (24%), National Lottery scratch-cards (21%) and placing a private bet for money (11%). The average age for respondents to have first participated in gambling was 12 years.

Compared to other potentially harmful activities, gambling in the past week is reported as more prevalent among young people than smoking cigarettes (5% of 11-16 year olds had done so in the past week) and using drugs (3%) but is less prevalent than drinking alcohol (16%).

The Ipsos MORI survey indicates that around 25,000 (0.9%) of 11-16 year olds are problem gamblers, and a further 36,000 (1.3%) are 'at risk' gamblers.

Social games and gambling-like activity online

In our response to the recent government Green Paper relating to a draft Internet Safety Strategy, we made clear our concerns that it was a mistake not to include gambling-related harms in relation to the use of the internet by children. Specifically, we are concerned that children are increasingly exposed to gambling and gambling-like activity online including by its promotion through social media, direct advertising, unregulated affiliates, betting on eSports, as well as the introduction of gambling-like activity to online video games.

Ipsos MORI reports just over one in ten young people (11%) have ever played gambling-style social games (which are often free to play and offer no cash prizes), with the majority of these playing via apps on smartphones or tablets (73%). 11% of 11-16 year olds claim to have personally ever participated in 'skins' betting, that is betting with in-game items when playing computer games or apps. This emerging phenomenon is much more common among boys (20%) than among girls (3%).

Gambling advertising, professional sport and social media

We are particularly concerned about the ever-growing relationship between professional sport and gambling, and specifically the exposure of gambling as a normal activity this gives to children. Nine of the 20 Premier League clubs carry gambling brands on their shirts, and recent studies demonstrate the high levels of exposure on both commercial television and the BBC.⁴

Ipsos MORI reports that young people continue to be exposed to gambling advertising via a variety of channels, with 80% having ever seen gambling advertisements on TV, 70% on social media and 66% on other websites. More than half of 11-16 year olds (55%) had seen gambling advertisements on TV at least once per week. One in ten 11-16 year olds (10%) follow gambling companies on social media such as Facebook, YouTube and Instagram.

⁴<http://research.gold.ac.uk/20926/1/Frequency%2C%20duration%20and%20medium%20of%20advertisements%20for%20gambling%20and%20other%20risky%20products%20in%20commercial%20and%20public%20service%20broadcasts%20of%20English%20Premier%20League%20football%20%283%29.pdf>

GambleAware has commissioned research on the impact of gambling advertising and marketing of all kinds on children, young people and vulnerable people. The research will address two specific trends in gambling advertising which we believe need regulatory attention –

- mass promotion of gambling via the ‘gambification’ of sport – i.e. presentation of gambling as an inherent part of sport through sports sponsorship, gambling-related advertising during sport, and the merging of sport with gambling content in online operator social media
- highly targeted advertising and marketing using behavioural data on consumers gathered by operators themselves as well as via consumers’ other online and social media behaviour, with concerns in particular about targeting of vulnerable people and those experiencing problems with gambling.

A pilot to test the efficacy of educational resources to reduce gambling-related harms

The Ipsos MORI report suggests that more needs to be done to educate young people about the legal age to participate in different gambling activities and that more could be done to engage with children and young people so they know who to talk to if they need support in relation to their gambling behaviour⁵.

From a public health perspective, we consider that the most effective approach to reducing gambling-related harms is to take a wide range of actions which in aggregate, will have the desired impact. However, we consider that education plays a central role in ensuring that everyone understands better how gambling works and the associated risks, and that we build resilience across society, in particular among young people.

In 2016, GambleAware commissioned Demos to develop, pilot, evaluate and refine educational resources for British secondary schools as part of wider efforts to prevent gambling-related harms. The project has been a partnership between Demos, the PSHE Association, The Mentor Foundation UK (Mentor UK), the National Problem Gambling Clinic, and a range of independent teachers and advisors.

Four lessons were designed between January and September 2016 to be delivered as part of a planned programme of PSHE provision for Key Stage 4 pupils (14-year olds). The lessons encourage pupils to weigh risk, identify manipulative behaviour, manage impulses, and help others – covering a range of ‘risky behaviours’, but with gambling as a major case study. To inform these lessons, Demos drew on existing evidence for best practice in the field of prevention, as well as conducting primary research with pupils and teachers. The resources were piloted in four schools across the country during Autumn Term 2016, reaching approximately 650 pupils. More than 100 schools initially expressed an interest in taking part.

This project has demonstrated success. Most clearly, pupils have come away with some key skills, feeling more confident identifying and helping someone with a problem; and surveys suggest that there may have been some impact on at-risk behaviours. Positive lessons for others from the approach include the importance of taking a skills-based approach, and positioning gambling education within a well-planned PSHE curriculum with well-trained teachers. More challenging has been convincing pupils of the point of learning about something many do not see as a relevant risk. It may be that more needs to be done to shine a light on aspects of pupils’ everyday lives that are relevant; or, providing better explanation of the nature and purpose of prevention.

Demos put into place an evaluation framework to both assess the outcomes of the intervention and gain feedback for further resource refinement prior to publication. The evaluation methods consisted of:

⁵ Awareness of gambling-related organisations is relatively low, with only 17% of young people aware of GambleAware, 7% aware of the National Gambling Helpline and 3% aware of GamCare, compared to, for example, 37% who are aware of DrinkAware.

- Pre- and post- surveys over a 12-month interval (including questions capturing gambling participation and perceptions; a problem gambling screen adapted for the audience – DSM-IV-MR-J; and other questions related to key skills, capabilities, and learning objectives)
- Five lesson observations
- Post-delivery focus groups with teachers and pupils at each of the four schools.

For the evaluation, Demos took a 'quasi-experimental' approach. Four similar schools were recruited in the same locations as participating schools, and pupils in the same year group were surveyed over the same 12-month interval. While short of a randomised control, this approach helps to isolate outcomes that may be attributable to the intervention. As will be explained in the full report, however, Demos wish to avoid over-claiming in this regard, recognising the clear limits on what can be attributed to an intervention as short as this (especially positioned within a larger PSHE curriculum), and the range of confounding variables in any educational setting.

An independent evaluation is being concluded and early findings are positive, with the most substantial changes seen on key learning objectives:

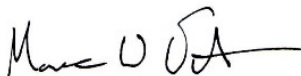
- For being able to describe ways to help someone experiencing gambling problems, there was a net 20 percentage point increase in the proportion of pupils able to do so relative to pupils at the comparison schools
- For knowing where to go to talk about gambling problems there was a net 18 percentage point increase in those able to do so relative to the comparison
- For being able to describe what delayed gratification is, there was a net 11 percentage point increase relative to the comparison
- For understanding techniques used by the gambling industry to persuade people to gamble there was a net 10 percentage point increase.

The final report, 'Reducing the Odds: An education pilot to prevent gambling harms' will be published in March 2018 and resources for teachers will be freely available online thereafter.

Conclusion

GambleAware considers that there is a strong case for teaching children in secondary schools about gambling and associated risks as a part of PSHE, and we think that further work to investigate the efficacy of teaching children about the same subject in primary schools ought to be encouraged. We welcome the government's commitment to build an evidence-based approach to reform of PHSE that works for schools and makes sure that all children benefit from a more consistent approach. GambleAware is committed to working with the Department of Education and all stakeholders in supporting the development of the evidence-base in relation to teaching about gambling-related harms.

Yours sincerely,



Marc W. Etches
Chief Executive