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Promoting safer gambling via the removal of harmful sludge: a view on how behavioural science's 'nudge' concept relates to online gambling

'Nudge' is a key concept of behavioural science [1], which is being used by governments to encourage better decision making [2]. A cafeteria for example can be redesigned to nudge healthier food choices by making salads easier to find than more calorific foods. Nudges improve consumer welfare via encouragements rather than mandates, and have been suggested as ways of promoting safer gambling by academics [3–6], and several gambling nudge field trials have now been run in the United Kingdom (UK) by the Behavioural Insights Team [7,8]. Behavioural scientists have also recently highlighted the risk of 'sludge': attempts to profit by encouraging consumers to act against their own best interests [9–12]; a term synonymous with what has previously been called a 'dark nudge' [13]. A 'sludgy' firm can, for example, increase the waiting times on its telephone helpline to disincentivize customers from cancelling contracts. Here, we argue that online gambling operators' actions are more consistent with sludge than nudge, and that sludge reduction shows more current promise for promoting safer gambling.

For many years, UK online operators imposed additional frictions on gamblers' withdrawals compared to their deposits. Deposits could

be made instantaneously, but withdrawals would only be processed after several days, during which time they could be subject to a customer-initiated cancellation: a 'reverse withdrawal' [14]. This asymmetry in favour of deposits over withdrawals is consistent with sludge, especially given that impulsiveness is a risk factor for problem gambling [15]. The UK regulator banned reverse withdrawals in 2020 [16], but the practice is still used by operators in other markets such as the United States (US) [17].

Deposit limits are a key online safer gambling tool, allowing gamblers to set a binding deposit limit that they cannot break later while, for instance, chasing their losses in a hot emotional state. In January 2021, a UK Behavioural Insights Team report revealed how many deposit limit tools allow consumers to set extraordinarily high deposit limits of up to £100 000 via a dropdown list [7]. The report's field trial showed that gamblers set deposit limits on average 45% lower when the deposit tool was redesigned by removing the dropdown list's suggested limits and by getting gamblers to input their own limits. Deposit limit tool redesign is one nudge than an online operator committed to safer gambling could implement relatively easily. However, to our knowledge, no UK operator (including the

operator involved in the trial) has as yet made this change. High suggested deposit limits are also consistent with sludge, rather than nudge.

Reverse withdrawals and high suggested deposit limits are just two examples of online gambling sludge. Another recent example, made in this literature, is how mandated cost-of-play information is placed in a frequently misunderstood format [18] at the bottom of difficult to navigate help screens [19]. Although it would be beneficial to nudge gamblers toward safer choices, the prevention of both current and potential sludge practices should be of higher urgency in the agendas of those who want to promote safer gambling.

DECLARATION OF INTERESTS

P.W.S.N. is a member of the Advisory Board for Safer Gambling—an advisory group of the Gambling Commission in Great Britain, and in 2020 was a special advisor to the House of Lords Select Committee Enquiry on the Social and Economic Impact of the Gambling Industry. In the last 3 years, P.W.S.N. has received research funding from Clean Up Gambling, and has contributed to research projects funded by GambleAware, Gambling Research Australia, NSW Responsible Gambling Fund, and the Victorian Responsible Gambling Foundation. In 2019, P.W.S.N. received travel and accommodation funding from the Spanish Federation of Rehabilitated Gamblers, and in 2020, received an open access fee grant from Gambling Research Exchange Ontario. M.J.R. has received research funds from Gambling Research Australia, Victorian Responsible Gambling Foundation, Queensland Treasury, Victorian Treasury, NSW Responsible Gambling Fund, NSW Office of Liquor and Gaming, Tasmanian Department of Treasury and Finance, New Zealand Ministry of Health, Department of Families, Housing, Community Services and Indigenous Affairs, Alberta Gambling Research Institute and the First Nations Foundation. He declares no conflicts of interest in relation to this manuscript.

AUTHOR CONTRIBUTIONS

P.N wrote the manuscript with support from MR.

KEYWORDS

Behavioural science, choice architecture, deposit limits, gambling harm, online casinos, reverse withdrawals

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