

Written evidence for Department Culture, Media & Sport

Gambling Act Review

2021

Education is essential to prevent gambling
harms and safeguard future generations

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This is a response to a call for evidence on the Review of the Gambling Act 2005, as discussed in the context of whether the regulatory framework is effective and whether further protections are needed.

Our written evidence will focus on the prevention of harm as referenced in objective 15.2.

The world has changed since the Gambling Act was passed in 2005. Just like many other industries, the rapid innovation of technology has revolutionised gambling in this country and globally. This review process presents a much-needed opportunity for the regulation to catch up and for the UK to set standards for the world to follow.

YGAM is not a campaigning organisation, but we believe the approach adopted should have a strong focus on education and prevention similarly to other public health issues. This review will scrutinise all aspects of regulation and, as an education charity, we do not claim to have the expertise to contribute to most of these intricate policy decisions. However, we passionately believe that regardless of any legislative changes, the need to educate our future generations on the potential harms is more important than ever.

The demand for evidence-led, age-appropriate education to safeguard young people against gaming and gambling harms is high across a wide range of sectors and communities. This education should be targeted at not just young people but also parents, teachers, youth workers, health professionals and those with influence and care over young people.

Our response will focus on the importance of education in the collective efforts to reduce and prevent gambling harms in the digital age. We will specifically evidence the impact of the YGAM education programmes and the effectiveness of our approach.

The review is an opportunity to implement significant changes to improve the sector in which we all work.

However, it should also present an opportunity to demonstrate the ongoing progress and further support third sector initiatives that are helping to keep people safe.

Our submission is informed by the expert information and robust research which supports our programme content and the insight we acquire through our engagement with stakeholders and workshop delegates.

We look forward to working closely with all stakeholders and the Government to offer our insight and expertise to ensure any changes are focused on safeguarding future generations growing up in an innovative digital world.

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- Introduction to YGAM
 - The importance of education
 - Our programmes
 - Evidence of Impact
 - Loot boxes
 - Protecting Young People
 - Conclusion

An introduction to YGAM



Anne and Keith Evans
Founders and Patrons of YGAM

The Young Gamers & Gamblers Education Trust (YGAM) is an award-winning charity committed to a social purpose to inform, educate and safeguard young people against gaming and gambling harms.

The charity was founded in 2014 by Lee Willows, Keith Evans and Anne Evans following their own devastating personal experiences of gambling-related harm.

After suffering for around 25 years with a gambling addiction, Anne Evans' son Alan tragically committed suicide in 2010 at the age of 40. Since then, Anne has worked tirelessly to help raise awareness and educate others, so that in her words 'no mother has to experience the pain she did'. In 2016, Deputy Speaker Dame Rosie Winterton CBE MP nominated Anne to receive an NHS National Award for Excellence in Public Health and Wellbeing for her work regarding gambling-related harm.

Our Chief Executive and co-founder Lee Willows had a successful career in non-formal education and had never previously gambled until the day he visited a casino for the first time after his plans for that evening changed. He won big that night, but it was downhill from there: going to the casino every day, losing everything he had to the point where he planned to take his own life. Following his difficult recovery, Lee decided he wanted to use his negative experience to make a positive difference. In 2014, there was no education on this topic in schools and a glaring lack of awareness as a safeguarding issue.

The complete absence of youth education programmes motivated our co-founders Lee, Anne, and Keith to utilise their education careers and establish YGAM six years ago. The charity now delivers free specialist Continuing Professional Development (CPD) training and resources to teachers, youth workers, parents, university staff and health professionals. We also have a free Student Hub (www.students.ygam.org) and Parent Hub (www.parents.ygam.org) which provide a wide range of free information, advice and resources to help keep young people safe. Our portfolio of education programmes currently includes:

- **Young People's Gambling Harm Prevention Programme** (teachers and youth workers)
- **University & Student Engagement Programme**
- **Parent Programme**
- **Mindful Resilience Programme** (health professionals)
- **Preventing Gambling Harms in Diverse Communities** (community and faith leaders)

YGAM's social purpose is to inform, educate, safeguard and build digital resilience amongst young and vulnerable people, helping them to make informed decisions and understand the consequences around gambling and gaming. Our social purpose and strategy are guided by and contribute to the Gambling Commission's National Strategy to Reduce Gambling Related Harms.

Our vision is that all young and vulnerable people are safe from gaming and gambling related harms.

Seven years on, the charity has a dedicated team of over 40 employees which includes former teachers, youth workers, practitioners, parents and individuals with lived experience.



Lee Willows
Founder and CEO of YGAM

The importance of education

At YGAM, we strongly believe education is essential to prevent gambling harms. Young generations now grow up entwined in the digital world, always just a few clicks away from the online galaxy of gaming and gambling.

We believe society has a responsibility to educate young people about the risks of gambling, just like we do on public health matters such as alcohol and drugs.

It is imperative that we equip young people with the knowledge and understanding to reduce their vulnerability as they reach the legal age to gamble. The level of gambling advertising in the UK has transformed gambling businesses into household brands, so it is naive to think that young people are unaware of gambling before they turn 18.

Evidence from prevention science stresses that many components of effective prevention, such as age-appropriate information, interactive teaching, normative education, or social resistance skills, can be incorporated into education¹. Gambling education alone is unlikely to bring about behaviour change². However, by developing gambling education interventions and curricula on the basis of established principles from prevention evidence, it may be possible to contribute some preventative effects alongside broader educational benefits.

We engage with the education sector daily and we are constantly listening to the needs of teachers, practitioners and young people. It is very clear from these conversations that teachers and practitioners need and appreciate YGAM's resources more than ever. The feedback we receive and the insight gleaned from external evaluations is overwhelmingly positive. There is an enormous demand for information on gambling and gaming harm.

It is encouraging to see gambling now featured on the PSHE curriculum in England. However, we believe at least one awareness session should be compulsory for young people during their secondary education.

We must continue to be guided by professionals working in the education sector to deliver effective prevention programmes to young people.



‘Childwise’ revealed last year that 90% of 11-year-olds have their own phone and given the increased number of games available on smartphones that feature gambling-style mechanisms, along with loot boxes featuring more frequently than ever before in regular games, today’s young people are clearly more exposed to gambling than previous generations.



The Gambling Prevention Education Forum

YGAM, GamCare and Fast Forward have come together as three charities working within this sector to form an education roundtable which meets quarterly to share insight, evaluation, and expertise. We have also attended each other's training to give feedback.

In 2020, the forum developed a framework for effective gambling education³. All three organisations pledged to deliver education in line with this framework, and to act as ambassadors of best practice to others wishing to deliver, or already engaging with, gambling prevention and education.

Considering the relatively scarce evidence in the field of gambling prevention, the framework is also informed by well-established evidence and transferable learning from the field of substance use prevention.

It is important to understand that while gambling education tends to aim to develop knowledge, skills and attitudes and informs on facts, consequences and social contexts, gambling prevention aims to change behaviours (or potential future behaviours) by developing knowledge, skills and attitudes to prevent, delay or reduce the harms. Therefore, the intended outcomes of education programmes are generally narrower than the intended outcomes of prevention programmes; and the former are, of course, more achievable⁴.

The National Strategy to Reduce Gambling Harms outlines a comprehensive approach to implement an effective prevention plan that identifies a mix of interventions to be applied both at population and individual levels. In it, the Gambling Commission state (Gambling Commission, 2019–22): 'Prevention' of gambling harms will include a broad spectrum of measures at population level, such as regulatory restrictions on product, place and provider. This priority also includes reference to public health messaging and education programmes, and to specific work with individuals who are at risk of harm'.



Our Programmes

To reduce gambling harms, treatment services, prevention programmes and much-needed research projects must be appropriately resourced. In keeping with Government policy and in the absence of a statutory levy, YGAM raises income directly from operators, as part of the advised RET framework contribution which all licensed operators are recommended to make annually. YGAM is working within the current system and supports proposals for increased funding spread across the framework.

This framework has been strengthened by the Gambling Commission with the introduction of a list of approved organisations to which operators can donate. To be on this list, organisations must demonstrate their impact, independence and contribute to the National Strategy to Reduce Gambling Harms. YGAM has been approved to be on the list, however this does not guarantee funding, therefore we make proposals directly to operators.

It is commonplace within the third sector that while funders may fund and support specific pieces of work, at no point do they have any influence over programme content. It is crucial that the work of organisations involved in the RET system is completely independent from the industry.

YGAM encourages operators to establish a Charities Aid Foundation (CAF) account and to route their donation via CAF. This brings in an additional level of governance and scrutiny. In addition, YGAM is led by a Board of Trustees who are all independent of the gambling industry and who all give their time voluntarily. Within our tight governance structures, we also have a Finance, Audit & Risk Committee who scrutinise all our donations and support our Senior Leadership Team to ensure that at no time is our independence compromised.

All the YGAM resources, training and education programmes have been independently scrutinised, challenged, evaluated and quality marked by a wide range of organisations including City University of London⁵; Pearson; City & Guilds; University of East London; National Council for Voluntary Organisations⁶⁷, Charities Evaluation Service; Clearview Research⁸⁹ and The Charity Commission. A critical part of all these evaluations is being able to demonstrate clear independence and show evidenced-based approaches.

The current RET framework has enabled YGAM, along with many other charities, to develop and deliver impactful programmes aimed at reducing harm. However, it is the view of YGAM that areas of the framework can be improved to facilitate more long-term funding of projects as demand for these services increases.

YGAM supports the notion of a statutory levy. The introduction of a statutory level would secure increased stable funding for organisations such as YGAM, enabling more in-depth long-term planning and evaluation. Any new framework must be transparent, inclusive and focus on supporting the delivery of initiatives that evidence real impact. It is important that any changes to the system do not unintentionally hinder progress currently being made.

YGAM leads a number of key education programmes which include:

The Young People's Gambling Harm Prevention Programme

YOUNG PEOPLE'S GAMBLING HARM PREVENTION PROGRAMME

Education | Training | Support



This four-year national programme was launched in 2020 and is the largest of its kind. Delivered in partnership with GamCare and supported by the Betting & Gaming Council, the £10million programme aims to deliver evidence-led education, training and support to young people across England, Wales and Northern Ireland, as well as collaborating with other organisations supporting young people across Scotland. YGAM will receive £2.9million for our delivery role as detailed in the programme plan.

GamCare and YGAM have collectively set out the following shared aspirations for gambling education in the UK:

- All 11-19 year-olds in England, Wales and Northern Ireland receive at least one session of gambling awareness education during their secondary/further education.
- All teachers, youth workers and other professionals working with young people should have access to information about the risks of gambling, how to identify gambling related harm in young people and where help can be sought.
- All parents and families should have access to information about young people's gambling, how to keep young people safe, and where they can be referred for help and support.
- All young people (aged 18 and under) who are 'at risk' of or have developed a problem with gambling, or are affected by the gambling of someone close to them (e.g. a parent), should have access to age-appropriate treatment.

The YGAM training for teachers and youth workers incorporates crucial evidence-based learning on:

- **Why people gamble?**
- **Why people game ?**
- **Money and debt**
- **Probability and luck**
- **The gaming industry**
- **The gambling industry**
- **Addiction and mental health**



Through these topics we explore the impact of external influences, including marketing and advertising, social media, and prevalence within communities. We cover in-app purchases, free-to-download content, loot boxes and the blurred lines between gaming and gambling (including information and resources about Esports). We provide information about gaming and gambling related harms with resources designed to help identify the signs and options for sign posting for appropriate treatment and interventions.

Gaming and gambling now feature on the PSHE (Personal, Social, Health and Economic Education) Programme of Study in England and we match our resources for this programme to the curriculum specifications.

Our programme is also mapped to the four purposes of the Curriculum for Wales with a selection of our resources available in the Welsh language.

We provide full Schemes of Work from Key Stage 2 through to Key Stage 5. Similarly, to other education programmes delivered to young people, we work with external experts to ensure our offering is independently assessed and age appropriate.



Both YGAM and GamCare have surpassed the first-year targets for the programme, despite significant challenges imposed by the continuing COVID-19 pandemic. YGAM **trained 2,906 practitioners** in 2020 (up from our original target of 2,592), and practitioners have **reached 184,700 young people** to provide vital educational sessions on the harms associated with gambling and gaming (up from a target of 170,300).

In addition, GamCare trained 4,185 professionals who work with young people and delivered education workshops directly to 3,947 young people. GamCare has also set up the first national young people's support service, offering information, advice and support tailored specifically to the needs of young people impacted by their own gambling or that of a loved one. Young people access this service online or over the phone, with support available around the clock.

Simon Hoare MP, current Chair of the Northern Ireland Affairs Select Committee, has also supported the work of this programme. He said: "I have been briefed on the plans YGAM has for North Dorset and I believe there is a real need for their services to support our young people. Whilst schools have been closed during the lockdown, the amount of time young people have been spending online has increased significantly meaning this work has never been more important."

University & Student Engagement Programme



Through our work and research, we have identified students as a potentially vulnerable group due to several risk factors. Students have often just reached the legal age to gamble, received a substantial amount of money through a student loan and are exploring new experiences with new friends living away from home for the first time.

In 2019, YGAM commissioned Red Brick Research to undertake research into gaming and gambling among undergraduate students, with more than 2,000 undergraduates and postgraduates surveyed.



The 'How Gaming and Gambling Affect Student Life' report¹⁰ provides valuable insights on the prevalence and behavioural habits for university students. Specifically, the report provides a detailed breakdown of gameplay, gambling behaviours, and the implications for student life.

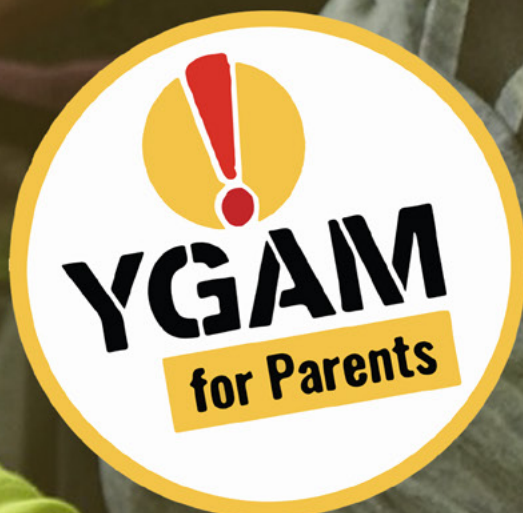
Findings showed that **47% of students** had **gambled in the last 12 months**. Of these, **16%** can be **identified as moderate risk or problem gamblers**, meaning about **264,000 students in the UK are at some risk from gambling** with around **88,000 already**.

We believe the student population is a specific group that needs tailored education programmes. YGAM runs a University and Student Engagement programme which delivers training to university staff responsible for student mental health and wellbeing.

The Gambling and Gaming Awareness course has been piloted and adopted to form part of the Wellbeing Development Programme at the University of Birmingham. The course provides staff with an insight and understanding of both gambling and gaming and explores, by using research and data, the associated risks that young adults are vulnerable to. The training, which also teaches university staff to spot the signs of students who may be struggling, was delivered to the University of Birmingham as a first step in YGAM's plans to roll out this programme and offer this training to universities across the UK. YGAM believes all relevant university staff should receive training on gaming and gambling harms to help safeguard students.

As part of our student programme, we employ students in Living Wage part-time jobs to deliver awareness campaigns to fellow students about the risks associated with gaming and gambling. Our student team have developed our Student Hub website, a holistic digital resource covering a range of topics from mental health and where to find support.

The Parent Programme





The objective of our parent programme is to provide parents and carers with the knowledge and resources to safeguard their families from the harms associated with gaming and gambling. YGAM has developed the Parent Hub, a website which hosts a collection of free practical tips, interactive Activities and advice to help parents understand the risks and manage their child's safety online.

The digital resource includes insights and guidance from parents, leading academics and teachers. The programme will be further enriched during 2021 with the introduction of bespoke workshops to help parents identify signs of harm, changes in behaviour and establish healthy boundaries with gaming.

The Mindful Resilience Programme



Mindful 
Resilience

YGAM is leading an alliance of experts from Bournemouth University, Betknowmore and the Responsible Gambling Council to introduce a purposeful initiative to deliver specialist training on gambling, gaming, and digital behavioural addictions to health professionals. This programme will pilot in London in May 2021 and the aim of the initiative is to address gaps in knowledge to enable healthcare professionals in primary care networks to engage and identify gaming and gambling harms and signpost patients to the appropriate support available. Gambling problems commonly co-occur with other mental health problems.

**Mindful
Resilience**

However, screening for gambling harms rarely takes place within mental health treatment settings which highlights the need to upskill health professionals so they can better identify and signpost appropriately¹¹. The free-to-access training is specifically tailored to the modern needs of the NHS and is informed by lived experience and academic insight.



The Preventing Gambling Harms in Diverse Communities Programme

Preventing Gambling Harms in
Diverse Communities

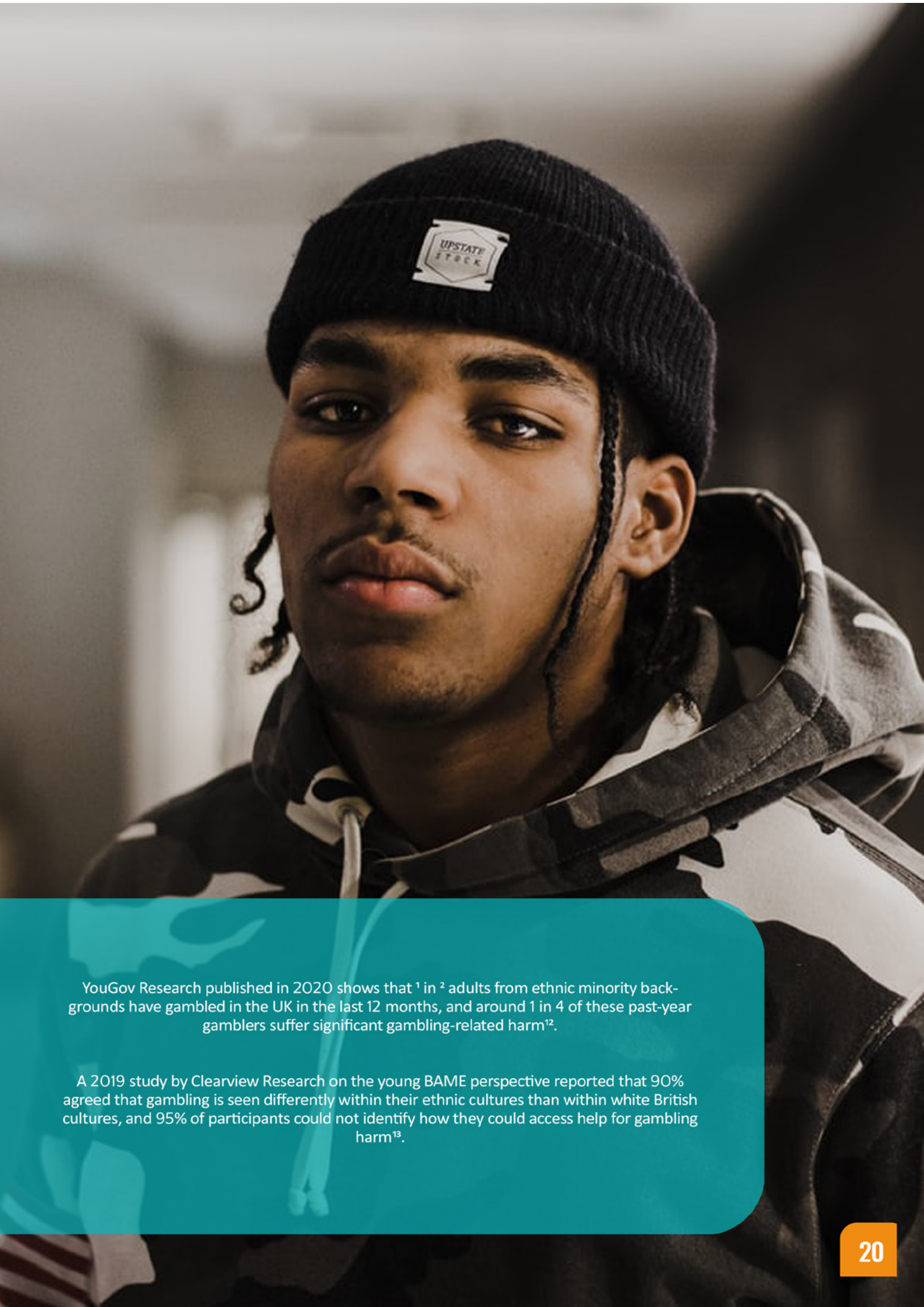
This initiative has been developed through a unique collaboration between YGAM, TalkGEN CIC, Red Card Gambling Support Project CIC and Clearview Research. The programme will deliver free specialist workshops to young people from ethnic minority populations aged 14–24, as well as free training to community and faith leaders. The programme content centres on an understanding of socio-cultural and religious contexts on shame and stigma relating to gambling harms.

Preventing Gambling Harms in Diverse Communities

The three partner organisations have all been established by individuals who have personal lived experience of the harms and impact of gambling addiction. TalkGEN CIC and Red Card Gambling Support Project CIC will work collaboratively to maximise synergies and combine resources to create young person facing educational content, using insight from the YGAM and Clearview Research content co-creation sessions.

The content will include culturally-specific gambling-harm awareness short films that cover different areas in the black and Asian communities as well as self-help information and age-appropriate signposting material. Over the two-year pilot, 16,600 young people will be reached directly.

The project builds on the recommendations from the Clearview Research; 'Gambling: the young BAME perspective', commissioned by GambleAware in 2019. YGAM will take the lead on the training of community and faith leaders who once trained will deliver the programme to young people. Over the two-year pilot, YGAM will aim to train 323 practitioners, who will in turn reach 18,050 young people in their care.



YouGov Research published in 2020 shows that ¹ in ² adults from ethnic minority backgrounds have gambled in the UK in the last 12 months, and around 1 in 4 of these past-year gamblers suffer significant gambling-related harm¹².

A 2019 study by Clearview Research on the young BAME perspective reported that 90% agreed that gambling is seen differently within their ethnic cultures than within white British cultures, and 95% of participants could not identify how they could access help for gambling harm¹³.

Since YGAM's inception we have focused on independent evaluation and securing external accreditations for our work. There is robust evidence to demonstrate that our programmes are impactful in supporting our social purpose. As an organisation, we continue to invest a substantial amount of time and resources into our evaluations and impact reporting.

Our initial Theory of Change as a charity was developed by an evaluation team from Ernst & Young; this was developed further in 2020 with scrutiny and support from the evaluation team from NCVO CES where the impact on children and young people was also included.

Evidence of impact

YGAM employs a full-time Head of Quality Assurance who has established a Quality Management System across the charity to ensure consistent and impactful delivery.

In the Summer of 2019, we commissioned the National Council for Voluntary Organisations, Charities Evaluation Services (NCVO CES) to undertake an independent external evaluation looking at the impact of our work on practitioners and young people. This was in addition to the City University of London academic evaluation we commissioned two years' previously. NCVO CES is the leading evaluation consultancy for the voluntary sector. Over 27 years, they have worked with tens of thousands of voluntary organisations and funders, helping them improve their effectiveness through evaluation, theory of change and strategy support.

In addition to this, teachers and youth workers evidence the impact of our programmes by collating feedback from the young people they deliver our resources to. We asked the young people surveyed if they understood how gaming/gambling might affect mental health and wellbeing. They reported on average 94.1% confidence in this area having received a YGAM session from their teacher/youth worker. We also ask the young people if they felt more able to make informed choices as a result of a YGAM session and they scored an average of 91.8%.

Deputy Speaker Rt. Hon Rosie Winterton CBE MP has praised the work of the charity saying, "I strongly believe that their work shaping the magnificent YGAM charity will have saved lives".

YGAM recently received a national award for our role in the delivery of the 'Young Peoples Gambling Harm Prevention Programme'. We collected the PSHE Education accolade at the Children & Young People Now Awards 2020 which honours organisations that 'provide outstanding resources to educators for PSHE education, delivering materials and lesson plans that align cohesively with current national curriculum requirements.'

YGAM also received further recognition by accepting three more awards at the Digital Impact Awards. Alongside their design agency Me&You Creative, YGAM picked up Silver Awards for 'Best Communications during COVID-19' and 'Best use of Digital for Education' followed by a Bronze Award for 'Best use of Digital for a Charity'. These awards were in recognition of the substantial digital transformation of the YGAM resources which has enabled the team to continue to deliver their programmes during successive lockdowns.



The latest NCVO CES independent impact evaluation¹⁴ of our resources found:

Strong evidence that young people understand gaming and gambling related harms including the risks and triggers.

Strong evidence that young people are aware of the resources that they can turn to for help and support.

Strong evidence that young people feel confident to discuss gaming and gambling related harms with their peers and others.

Strong evidence that young people have financial knowledge in relation to gaming and gambling.

Loot Boxes

As our programmes focus on gaming as well as gambling, it is pertinent to align this written evidence with our response¹⁵ to the request for evidence on the issue of 'loot boxes', as discussed in the context of purchasable items of chance in electronic computer gaming.

Through our engagement with education and partnership with the research of Dr James Ash at Newcastle University, we believe there is compelling evidence to suggest that loot boxes and other in-game mechanics can and do cause levels of harm with children and young people.

The concern about allowing those under 18 to access loot boxes is that it is conditioning them to gambling behaviour when they are not of an appropriate age.

We agree with the views of the Digital, Culture, Media and Sport Select Committee and the Children's Commissioner that loot boxes that contain the element of chance should not be sold to children under 18.

The connection between this purchase and "real" currency diminished directly because of the pack purchases being made with in-game currency and not pounds and pence. It is due to this disconnect between "real" money that we believe younger players in particular are less likely to recognise the actual costs of their actions.

We think it is especially vital to ensure parents are informed as they are usually the ones who purchase these games and in-game items for their children. The enormous variety of games and in-game purchases available can make it confusing for parents to keep on top of safety controls. Through our educational resources and Parent Hub website, we are focused on providing crucial information to parents so they can safeguard their children.

In 2019, we hosted a symposium with stakeholders in Parliament on the topic of 'Loot boxes, Apps, and Freemium content'¹⁶.

At YGAM we continue to work closely with a number of academics who have carried out extensive work in this space, and we aim to be involved in future research that looks at the links between young people, loot boxes and gambling-related harm.

We hope the Government consultations on both loot boxes and the Gambling Act will lead to a serious investigation into the risks associated with loot boxes and a realisation that those that come with an element of chance should not be available to those under 18.

Protecting young people

We believe keeping our young people safe should be the key focus of any outcomes of this review. Education alone will not prevent gambling harms, therefore we strongly support the introduction of any further protections for young people.

There is a reason why gambling products are age restricted and therefore the age-verification systems must be vigorous, both online and offline. New technology should be embraced to improve age-verification checks as young people are increasingly accessing activities online. We welcome the decision to raise the age for National Lottery play to 18.

More needs to be done to minimise the exposure that children and young people have to gambling advertising. All gambling advertising should be designed and displayed in a way that is appropriate for adults and avoids marketing techniques that appeal specifically to children. There is opportunity to strengthen advertising protections and both the advertisers and the platforms which host adverts should use technology and data to do more.

Too many young people are suffering in silence and we would like to see more resources directed towards public awareness campaigns on all forms of popular media to raise the profile of the issue of gambling harm and importantly be clear on what support is available. There is a need to invest in visible campaigns that aim to break down stigma and encourage young people to talk about the impact gambling may be having on their mental health, relationships and lifestyle.



Conclusion

The gambling industry must do much more to protect consumers and regulation must be improved to keep up to date with fast-paced innovation of the digital world. It is for the Government, the regulator, and the industry to act with real purpose. We trust the conclusions of this review will introduce regulatory changes that help reduce gambling harms for years to come and position the UK as the benchmark for standards across the global market.

Young people are growing up in a world that is increasingly online and the evolving risks must be mitigated against. Education is a powerful tool in helping to address a wide range of issues in society and this is certainly the case for gambling harm. Prevention is a better solution than treatment and this is achieved through education. It is vital that gambling harm is given the same level of focus as other public health issues such as alcohol and drugs. This should involve meaningful engagement from the Department of Health and Social Care and the Department for Education, so that it is a recognised topic that is firmly on the agenda. Gambling harms demand significantly more investment in research, education and treatment but also merits much more public awareness and understanding.

The portfolio of YGAM programmes is helping to inform, educate and safeguard our future generations against the risks of gaming and gambling harm. Our evidence-led approach is backed up by robust external evaluations and has been enhanced through constructive scrutiny from a diverse range of academics, education leaders, practitioners, and individuals with lived experience. Education and evaluation are key to prevention.

The research, education and treatment framework can be improved through increased resources and a long-term strategy that supports existing initiatives whilst welcoming new ideas. The introduction of a statutory levy would hopefully help achieve this stability if established appropriately. Any framework must be inclusive, transparent, and strictly guided by evidence. We support all proposals that secure the long-term delivery of a diverse range of programmes aimed at reducing gambling harms.

There is still plenty more work to do. However, significant progress has been made in recent years by third sector organisations working in this space. Our network is a diverse mix of experienced professionals, educators, clinicians, researchers, specialists and importantly individuals who provide a unique insight from their lived experience of gaming and gambling related harms. We hope this review process will support the progress that has been made and will look at opportunities to promote the methods which demonstrate meaningful impact.

Education is essential to prevent gambling harms and safeguard future generations



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