

**A SOCIAL RESPONSIBILITY RISK
ASSESSMENT OF THE *FAIR
CHANCE LOTTERY***

REPORT BY

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EXECUTIVE SUMMARY

- A social responsibility risk assessment was conducted of the *Fair Chance Lottery*. The analysis focuses on the potential risk of the game for vulnerable players as the most at risk group of players generally. However, the risk for normal players is also considered.
- In carrying out a risk assessment of the *Fair Chance Lottery*, a new tool developed by the *International Gaming Research Unit* was used (*GAM-RiSC*). The measure examines the structural and (relevant) situational characteristics of the game, that is, the features of the actual game design that make it rewarding to play.
- Scores on *GAM-RiSC* range between 11 and 53. The higher the score, the more risky the game is to vulnerable people. The *GAM-RiSC* measure provided the *Fair Chance Lottery* with a total score of 16 (out of 53). More specifically:
 - Green = low risk for vulnerable players (scores of less than 20):
 - Amber = medium risk for vulnerable players (scores of 20 to 30);
 - Red = high risk for vulnerable players (scores of over 30).
- On the basis of the *GAM-RiSC* score, the *Fair Chance Lottery* is rated as a ‘low risk’ game for vulnerable individuals.
- Rapid event frequency is widely accepted as one of the most influential factors for vulnerable gamblers developing gambling problems. In this respect, the *Fair Chance Lottery* can be considered a very safe game in comparison to almost any other game currently on the market.
- Other factors noted that help decrease the risk potential for the *Fair Chance Lottery* include characteristics such as:
 - The discontinuous nature of the game
 - No chance to reinvest any winnings in the game
 - No illusion of control elements in the game
 - No near misses designed into the game
 - The fixed stake size of a game at a low price
 - The game’s low “jackpot” size (i.e., the price of the goods in the shopping basket)

- The *GAM-RiSC* score compared to other gambling games, makes the *Fair Chance Lottery* one of the least risky (i.e., safest) games in the worldwide gambling market. Overall, the *Fair Chance Lottery* was found to be low risk for vulnerable and normal players.
- The *Fair Chance Lottery* does not appear to have any specific appeal for under-aged players. Age verification systems appear to be in place.
- The report also examined areas that might be considered to reduce the minimal risk potential even further. Purchase options could perhaps be limited to debit card, and pre-paid account options (i.e., avoiding credit purchases). Other areas to consider might be imposing spend limits across particular blocks of time, and the use of tracking technology that give players access to their playing data (particularly if the game is played on the Internet).

BACKGROUND TO THE SOCIAL RESPONSIBILITY RISK ASSESSMENT

Structural characteristics are typically those features of a game that are responsible for reinforcement, may satisfy gamblers' needs and may (for some 'vulnerable' players) facilitate excessive gambling (Griffiths, 1993; 1999). By identifying particular structural characteristics it is possible to see how needs are identified, to see how information about gambling is perceived, and to see how thoughts about gambling are influenced (Griffiths, 1993).

Showing the existence of such relationships has great practical importance as potentially 'risky' forms of gambling can be identified. Furthermore, by identifying particular structural characteristics it may be possible to understand more about gambling motivations and behaviour, which can have useful clinical, academic and commercial implications (Parke & Griffiths, 2007).

Situational characteristics are typically those that get people to gamble in the first place. These characteristics are primarily features of the environment and can be considered the situational determinants of gambling. These characteristics can refer to both 'purchase' and 'play' environments and can include such characteristics as the location of the gambling outlet, the number of gambling outlets in a specified area, and the use of advertising in stimulating people to gamble. These variables may be very important in the initial decision to gamble and may help clarify why some forms of gambling are more attractive to particular socio-economic classes (Griffiths & Wood, 2001).

Some situational characteristics overlap with structural characteristics. For example, the accessibility of the gambling activity can determine both the ease with which a game is accessed (situational) as well as how the game appears, and is experienced (structural).

The importance of a structural characteristic approach to gambling is the possibility to pinpoint more accurately where an individual's psychological constitution is influencing gambling behaviour (Griffiths, 1999). Such an approach also allows for psychologically context-specific explanations of gambling behaviour rather than global explanations such as 'addictive personality' (Parke & Griffiths, 2006).

Although most (if not all) gambling-inducing structural characteristics (e.g., event frequency and consequent reinforcement) are dependent on individual psychological factors, they are a direct result of the structural characteristics and could not have influenced gambling behaviour independently. This is what Griffiths (1993) has described as a ‘psycho-structural’ interaction. It is for this reason above all others that a structural approach is useful. Structural characteristics are still capable of producing psychologically rewarding experiences even in financially losing situations (e.g., the psychology of the near win) (Griffiths, 1999).

It has been widely accepted that structural and situational characteristics influence the acquisition, development, and maintenance of gambling behaviour. However, it would appear that the role of structural characteristics has become even more significant within the past decade (Parke & Griffiths, 2006; 2007). Arguably, some of these more technologically advanced structural characteristics have an even greater potential to induce excessive gambling in some cases.

Such sophisticated features include interactive feature plays, increased skill orientations, faster and more continuous game play, and better graphical interfaces. These features when combined with a gambler’s individual characteristics have the potential to produce psychologically immersive games (Griffiths, 2003; Griffiths et al, 2006; Wood et al, 2004; Wood & Griffiths, 2007a; Wood, Parke & Griffiths, 2007). Therefore, any effective measures aimed at reducing the risk of ‘vulnerable players’ developing problems needs to consider the ‘risky’ elements of games during their development stages.

By applying a suite of responsible gaming measures, I was able to undertake an in-depth analysis of both the structural characteristics of the *Fair Chance Lottery* and the gaming environment. Such an analysis is designed to focus on the risk potential for vulnerable players. These vulnerable players are defined as any adult with either a biological, psychological and/or emotional predisposition to gamble excessively, or for those players whose personal circumstances may put them at a greater risk of developing gambling problems (e.g., low income individuals, those with co-morbid disorders), as well as recovering problem gamblers. The number of people in a population who can be considered vulnerable will depend on variable factors such as the economic status of the country. A vulnerable person is also more susceptible to other problems such as alcoholism and substance abuse not just gambling.

Therefore, gambling is just one of several possible behaviours that they could conceivably develop a problem with. However, the percentage of

people who develop any kind of gambling problem tends to be in the range of 0.5-3% of the population depending upon the country and the way that problem gambling is measured. The risk for normal players is also considered but will, by definition, be far less than for vulnerable players. The risk for problem gamblers playing is not directly assessed as problem gamblers have already reached a point where preventative measures are no longer effective, and as such can only be helped through treatment measures. However, the analysis will also consider the overall appeal and accessibility of the *Fair Chance Lottery*.

METHODOLOGY EMPLOYED

In carrying out this risk assessment, I utilised the following sources and resources in making my assessment of the *Fair Chance Lottery*.

- Notes made following a 90-minute face-to-face meeting with *Fair Chance Lottery* representatives John Landsverk and Erik Baroe (Executive Vice President).
- Use of the gaming risk assessment tool *GAM-RiSC* (see next section and Appendix 1 for further explanation)
- Materials supplied by *Fair Chance* (including the presentation *Improving the World, One Transaction at a Time*; the report *Fair Chance in Store and on the Internet: Attitude and behaviour in Norway* (TNS Gallup Survey, April 2007); application of the *Fair Chance Lottery* to the Norwegian Gaming Board).
- Evaluation of the relevant psychological literature on problem gambling in relation to structural and situational characteristics.
- My own 20-year experience of working in the problem gambling field (see Appendix 2).

GAME DEFINITION AND PARAMETERS

My understanding of the *Fair Chance Lottery* is that when in a retail store, the game allows customers a chance to win what is in their “shopping basket” by buying a ticket when paying for their goods. The price of the tickets is very modest (NOK 3-/NOK 5-) and that no customer can buy any more than nine tickets during one shopping transaction. It is also my understanding that some of the money raised will go towards good causes such as the *Red Cross*. The *2007 Gallup Survey* provides valuable attitudinal data about the product and appears to show that price is not significant and that people would buy tickets to help support a good cause. Whilst there is

an element of ‘social desirability’ in responding to surveys like this, the responses provided by the Norwegian participants were closely aligned with the empirical evidence on the topic. For instance, when comparing the *Fair Chance Lottery* with five other gambling products (lotto, bingo, slot machines, football pools and *RiksToto* [horses]), Norwegian people in the *2007 Gallup Survey* thought that the *Fair Chance Lottery* would be the least problematic form of gambling.

RISK ASSESSMENT OF THE FAIR CHANCE LOTTERY

In carrying out a risk assessment of the *Fair Chance Lottery*, a new tool developed by the *International Gaming Research Unit* was used. The measure is designed to examine the structural and (relevant) situational characteristics of the game, that is, the features of the actual game design that make it rewarding to play. The final measure is known as the *Gaming Assessment Measure – Risks involving Structural Characteristics (GAM-RiSC)* (Wood, Griffiths & Parke, 2007; Griffiths, Wood, Parke & Parke, 2007). *GAM-RiSC* has been designed so that it can be used to assess any gambling type game by anyone with a basic knowledge of the features of the game. *GAM-RiSC* contains ten items that relate to structural and situational characteristics of games (see Appendix 1 as applied to the *Fair Chance Lottery*). The measure provides each game tested with a total score that gives a ‘traffic light’ rating of either: green = low risk for vulnerable players (scores of less than 20); amber = medium risk for vulnerable players (scores of 20 to 30); red = high risk for vulnerable players (scores of over 30). Scores on the measure range between 11 and 53. The higher the score, the more risky the game is to vulnerable people. The *Fair Chance Lottery* scored 16 (out of 53), which compared to other gambling games, makes it one of the least risky games in the worldwide gambling market. It is also worth noting that the people surveyed in the *2007 Gallup Report* also reached a similar conclusion that in their belief, the *Fair Chance Lottery* would not generate addiction to gambling. If the game was played via the Internet, the score on *GAM-RiSC* would increase to 18 (out of 53) but would still be classed as ‘low risk’.

GAM-RiSC was developed through a combination of examining the current state of research on structural and situational characteristics worldwide, and by employing a team of leading world experts, in terms of researching responsible gambling issues and treating problem gamblers. All the research team had considerable knowledge of these issues and their insight of problem gambling is far greater than ‘vulnerable’ individuals, who often do not understand the causes of their gambling difficulties, or not at least until the later stages of their treatment. For this reason, the research focused on developing a measure using expert knowledge and extensive reviewing of all

the research data currently available. Final testing of the measure compared the results to the known risks associated with established games.

STRUCTURAL RISK FACTORS IN GAMES

Rapid event frequency is widely accepted as one of the most influential factors for vulnerable gamblers developing gambling problems. This is largely because a rapid event frequency provides the opportunity for chasing behaviour (one of the major risk factors of problem gambling). Another consequence of rapid event frequencies is that they produce short payout intervals. This means that any guilt or frustration about losing on an individual gamble is quickly forgotten as the gambler is already staking money on the next gamble.

Furthermore, rapid games are more likely to promote dissociation whereby a player gambles in order to change their mood state, often to escape from their problems (although it must be acknowledged that any game that keeps the players' minds occupied can be susceptible to dissociation). In these respects, the *Fair Chance Lottery* can be considered a very safe game in comparison to almost any other game currently on the market. The *Fair Chance Lottery* will typically have a low event frequency as a single game can only be played when the shopping is being paid for. This equates to a very low event frequency of approximately eight times a month for daily household retail trading, once a month for consumer electronics and the like, and four times per month for petrol stations.

Other factors that help decrease the risk potential for the *Fair Chance Lottery* include characteristics (see Appendix 1) such as:

- The discontinuous nature of the game
- No chance to reinvest any winnings in the game
- No illusion of control elements in the game
- No near misses designed into the game
- The fixed stake size of the game at a low price
- The game's low "jackpot" size (i.e., the price of the goods in the shopping basket)

Players cannot buy more than nine tickets at any one time and pilot research on the product shows the average number of tickets bought to be 1.8. All evidence indicates that shoppers would be highly unlikely to keep buying shopping baskets in the hope of winning it. As there is a limit on the

number of tickets that can be bought at any one time, the player must take sole responsibility for the choice of buying several tickets at once. Jackpot sizes are variable but tend to be relatively small, unless the player has an unusually expensive set of goods they wish to purchase.

The use of virtual cash (such as the use of credit cards) can (in some circumstances) be problematic as the psychological value of money is likely to be perceived as less than when using actual cash (known as ‘the suspension of judgement’ when companies use virtual representations of money such as chips, tokens, smart cards). In addition, playing with credit rather than the players’ own money can sometimes be dangerous as the player maybe more likely to spend money that they cannot afford to lose. Limiting purchases to non-credit based transactions (e.g., debit cards and pre-paid accounts) would help minimise the risk although the suspension of judgement can still apply.

OTHER IMPORTANT FACTORS TO CONSIDER

One of the potential problems with gambling relates to losing too much time rather than too much money. It has been shown that problem gamblers tend to play for relatively long periods of time. This is almost impossible with the *Fair Chance Lottery*. It is also known that vulnerable players may play a game in order to dissociate and escape from everyday problems (Griffiths, Wood, Parke & Parke; 2006; Wood & Griffiths, 2007a). Whilst excessive play may not always have serious financial implications, it has also been found that excessive play can have serious implications for those who neglect work, family, or other social responsibilities. Again, this is highly unlikely with the *Fair Chance Lottery*. The inclusion of maximum spend limits per shopping transaction is an excellent feature to help minimise such concerns and should be actively promoted as a tool for maximising player satisfaction.

REDUCING THE RISK EVEN FURTHER

Although not part of the remit of this report, *Fair Chance* might like to consider the following responsible gaming features. Although not essential, measures such as this could be considered, where appropriate, to help to reduce this minimal level of risk even further.

The analysis provided in this report is based upon the structural features of the game and the environment in which the game is played. Whilst these are fundamental to overall risk rating of the game, it is also important that

relevant responsible gaming features should also play an important role in the adoption of any new game.

Any conscientious and socially responsible gaming operator will already have in place a responsible gaming policy that will apply to many of the necessary features (e.g., links to problem gambling services, information about odds, etc.).

Whilst the *Fair Chance Lottery* appears to be a relatively benign game, the following suggestions could be considered to further reduce the very minimal risk to vulnerable players. These suggestions need to be deemed appropriate and/or feasible in the context for which the game will be operate. (e.g., target customers, location of retailers, technical constraints, etc.).

- **Limiting purchases to debit card, pre-paid account:** Gambling with credit can be very tempting for a vulnerable player and can lead to increased levels of debt. However, if avoiding credit card purchases was not deemed appropriate or practical, then emphasising the spend limit options available should be actively promoted.
- **Imposing spending limits:** The possibility of limiting the amount of money that can be lost during either, a day, a week, or a month provides a means by which a player can effectively monitor their spending should a player have concerns about spending too much.
- **Embedding tighter social responsibility measures for remote gambling:** If the *Fair Chance Lottery* was to be introduced and played via the Internet, the operators should examine the many social responsibility guidelines for safer Internet gambling as remote gambling removed some layers of protection for vulnerable gamblers.
- **Voluntary online behavioural tracking and intervention:** Such features can increase the overall level of behavioural transparency associated with a game, allowing players to make informed choices about how much they play and how often (particularly if played via the Internet). I would recommend the use of *Spel Kol* in order that player behaviour can be monitored before and after the addition of the new players. Not only will this provide useful information for the operator, it will also help ensure a high level of behavioural transparency for the players.

CONCLUSIONS

The proposal to introduce the *Fair Chance Lottery* into the Norwegian market place is unlikely to have much, if anything, of an effect on either ‘normal’ or ‘vulnerable’ players. Nordic players have a reputation as very skilled players for activities like poker, both amongst themselves, and in other countries (Griffiths, Wood, Parke & Parke; 2006; Wood & Griffiths, 2007b). Whilst this could initially lead some Nordic players to believe they are more skilled players than they actually are, it is unlikely to have any long-term effect on their playing behaviour as the *Fair Chance Lottery* is chance-based. Whilst the *Fair Chance Lottery* is a game that includes only chance elements, some players may believe that they are more skilful than they really are. Clear statements about the chance-based nature of the game need to be emphasized at the till to fulfil social responsibility obligations.

Overall, I would rate the *Fair Chance Lottery* as a very low risk for both vulnerable players and normal players. Players should be able to clearly understand the extent of their playing both in terms of the amount they have spent and the length of time that they have been playing (which in this case would be minimal). As such, any features relating to a player’s play history should be actively encouraged. Recent research has indicated that players do not object to the presence of such (voluntary) features, and that they can in fact increase feelings of trust toward the gaming operator (Wood & Griffiths, 2007b).

The appeal of the *Fair Chance Lottery* to under-aged players is unlikely to be any greater than other lotteries. The *Fair Chance Lottery* should not be a problem as long as adequate measures are in place to ensure that under-aged players cannot buy tickets after purchasing their goods. Age verification procedures are an obvious and essential requirement. Overall, the *Fair Chance Lottery* does not use characters or design features that are associated specifically with any aspects of youth culture.

In summary, and based on the evidence presented in this report, I would conclude that it is highly unlikely that there would be any addiction/dependency problem with the *Fair Chance Lottery*.

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**APPENDIX 1: RISK ASSESSMENT OF *FAIR CHANCE LOTTERY* USING
GAM-RISC (TOTAL SCORE: 16/53)**

Characteristic	Question	Fair Chance Lottery
Event frequency (GAM-RiSC Score: 2/20)	What is the time gap between one gambling opportunity, getting the result, and engaging in another gambling opportunity on the same game?	The time gap between one gambling opportunity to the next is similar to one persons purchase pattern, i.e., one persons typical pattern in Norway is: <ul style="list-style-type: none"> • Retail trading for daily household: 8 times per month • Consumer electronics and similar etc: 1 times per month • Gas stations: 4 times per month.
Multi-game/stake opportunities (GAM-RiSC Score: 2/3)	Is there an opportunity to play multiple games/ stakes at the same time?	A customer can buy up to nine tickets at a time. Each ticket has a fixed price estimated to be 40p. (Pilot research shows the average to be 1.8 tickets = 72p)
Variable/fixed stake size (GAM-RiSC Score: 1/3)	To what extent can a player determine the stake size?	The customer cannot determine the ticket price/stake
Prize back ratio (GAM-RiSC Score: 1/5)	What is the average percentage of the stake that is paid back in winnings	Approximately 50% in pilots but could be 40%-60%
Jackpot size (GAM-RiSC Score: 1/3)	What is the largest amount of money that a player can possibly win per game?	The customer can only obtain the value of the shopping basket. No cash money is involved in the prizing structure. Therefore, the prize is unlikely to be more than £200 equivalent.
Near win opportunities (GAM-RiSC Score: 1/3)	Are there any instances when the player believes that they nearly won?	No
Continuity of play (GAM-RiSC Score: 1/5)	To what extent can the gambling be continuous?	No continuity or games in succession.
Accessibility points (GAM-RiSC Score: 3/5)	Where is the game played (Online? Offline? Gambling premises? Shop?)	Fair Chance is distributed at the point of payment in the physical shops. The system has an online infrastructure to a central server with centralized control and tracking.
Currency/Ease of pay (GAM-RiSC Score: 3/3)	What is the type of payment used to gamble and it's ease of use (e.g., cash, credit cards, accounts etc.)	Can be any of these as it is the same as the purchase, and added to the bill.
Illusion of control elements (GAM-RiSC Score: 1/3)	To what extent does the game suggest that there is skill involved (e.g. nudge buttons, stopping device)?	No skill or illusion of control involved.

APPENDIX 2: BRIEF BIOGRAPHY

MARK GRIFFITHS, BSc, PhD, CPsychol, PGDipHE, FBPsS

Dr. Mark Griffiths is a Chartered Psychologist and Professor of Gambling Studies at the Nottingham Trent University, and Director of the *International Gaming Research Unit*. He is internationally known for his work into gambling and gaming addictions and has won many awards including the American 1994 **John Rosecrance Research Prize** for “*outstanding scholarly contributions to the field of gambling research*”, the 1998 European **CELEJ Prize** for best paper on gambling, the 2003 Canadian **International Excellence Award** for “*outstanding contributions to the prevention of problem gambling and the practice of responsible gambling*” and a North American 2006 **Lifetime Achievement Award For Contributions To The Field Of Youth Gambling** “*in recognition of his dedication, leadership, and pioneering contributions to the field of youth gambling*”.

He has published over 185 refereed research papers, two books, over 35 book chapters and over 500 other articles. He has served on numerous national and international committees (e.g. *BPS Council, BPS Social Psychology Section, Society for the Study of Gambling, Gamblers Anonymous General Services Board, National Council on Gambling* etc.) and is a former National Chair of *Gamcare*. He also does a lot of freelance journalism and has appeared on over 1600 radio and television programmes since 1988.

He has been the keynote speaker at national gambling conferences in the UK, USA, Canada, Australia, Germany, Spain, Sweden, Norway, Denmark, Ireland, Finland, Poland, Italy, Holland and Belgium. He has also given keynote addresses to the US National Academy of Sciences (Washington DC), and the US National Center for Addiction (New York). He has also acted as a consultant for many Government bodies including the *Gambling Board for Great Britain, Gambling Commission, UK Home Office, Department of Culture, Media and Sport, Department of Health, Victorian Casino and Gaming Authority* (Australia) and various international Governments (including the US, Australia, Sweden, Norway and Finland). In 2004 he was awarded the **Joseph Lister Prize for Social Sciences** by the *British Association for the Advancement of Science* for being one of the UK’s “*outstanding scientific communicators*”. His most recent awards are the 2006 **Excellence in the Teaching of Psychology Award** by the *British Psychological Society* and the **British Psychological Society Fellowship Award** for “*exceptional contributions to psychology*”.