



Gambling advertising and marketing – the evidence

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DRAFT 3

PURPOSE

This is a summary of evidence on gambling advertising and its impact, relevant to the United Kingdom. Its purpose is to explain the evidence for an interested member of the general public (See the note for information on how the summary was put together).

THE CURRENT REGULATION OF GAMBLING ADVERTISING DOES NOT WORK

Since the Gambling Act 2005, there has been a dramatic expansion in advertising of all types of gambling, with gambling companies using sophisticated, multi-layered marketing strategies. The total spend by gambling companies in Great Britain on marketing between 2014 and 2017 increased by 56%, hitting £1.5 billion ([Regulus Partners, 2018](#)).

Gambling companies violate the codes

[Codes of conduct](#) exist to control the content and placement of gambling advertising, so it is socially responsible, and protects children, young people and vulnerable adults from being harmed or exploited. The Gambling Commission has defined vulnerable adults as people living in constrained economic circumstances, people with limited capacity to understand information and people already experiencing gambling problems, and children and young people as those aged 11-24. The codes state that the spirit as well as the letter of the rules apply. Gambling companies have shown they cannot be trusted to follow these codes.

Direct appeal to children and young people

The ASA found gambling advertising appearing on children's websites and YouTube channels in [2019](#) and [2020](#).

[Critchlow et al. \(2019\)](#) judged that 11% of traditional media advertising contained features that are likely to appeal directly to children and young people, as defined within the codes.

[Smith et al. \(2019\)](#) judged this to be the case in 21% of traditional betting tweets, 59% of tweets promoting esports bets, and 37% of esports tweets promoting gambling brands.

This included language (e.g. 'Starburst'), graphic design (cartoons, popcorn, lucky charms and unicorns), game-like avatars, choice of celebrities and individuals under the age of 25.

Exploitative financial incentives and bets

Gambling marketing uses financial incentives and promotes bets that plausibly exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children, young people or vulnerable adults, contrary to the codes – and are generally unfair to consumers.

Gambling advertising did this by implying limited risk, inflating suggestions of winning, complicated or misleading presentation of gambles and offers and suggesting gambling is

simple or that the company provided a safeguard. 22% of ads in traditional media were found to contain at least one of these features, a number that rose to 37% on Twitter ([Final Synthesis Report, 2020](#)).

In their review of international evidence, ([Newall et al., 2019b](#)) found the complexity of financial incentives is increasing, to take advantage of psychological biases so people would gamble more, rather than offering consumers incentives of actual value.

Gambling companies also promote odds that exploit psychological biases in decision-making and that are complex, which consumers struggle to understand – and which bookmakers make higher profits on ([Newall et al. 2019b](#)). During the World Cup, adverts were designed to drive gamblers to request-a-bet products, which allow gamblers to create their own bets with large potential payoffs, two established risk factors for problem gamblers. In this way, gambling companies promote bets ‘which problem gamblers might find especially alluring, and which yield high profit margins for the bookmakers’ ([Newall et al., 2019c](#), p.2).

Plausibly encouraging harmful gambling

The codes include that gambling marketing must not portray, condone or encourage gambling behaviour that could lead to financial, social or emotional harm, suggest that gambling can be a solution to financial concerns, play on impulsiveness and urgency and unduly pressure the audience to gamble.

Research found it was widespread practice for gambling companies to trivialise gambling, place undue emphasis on money motives (41% of traditional media adverts, 34% of traditional betting Tweets), create a sense of urgency for instant action (77% in traditional media) and encourage frequent gambling (a third in traditional media showed gambling as normal, frequent or daily activity) ([Final Synthesis Report, 2020](#)) – all known risk factors for problematic gambling. Live-odds in-play bets during the football World Cup had features to make them appear more urgent than necessary ([Newall et al., 2019d](#)).

Very poor consumer protection messages

The presentation of consumer protection messages (age warnings, health warnings, promotion of lower-risk gambling, Terms and Conditions) is very poor.

In traditional media, 14% had no age warnings, 11% no Terms and Conditions, and 14% no reference to messages that promote lower risk gambling and support. When these were present, none of the age warning messages and only 1% of the messages promoting lower risk gambling had acceptable, good or very good visibility. Only 7.3% of Tweets from traditional betting accounts had Terms and Conditions or promoted lower-risk gambling within the text ([Final Synthesis Report, 2020](#); [Critchlow et al., 2020b](#)).

Just over half of those aged 11-24 had observed age warnings and only 38% had seen safer gambling messages ([Macgregor et al., 2020](#)). People complained the ‘health warnings’ were hidden or reinforced fun ([Macgregor et al., 2019](#)). In a test of the warning label used by large UK gambling operators – ‘when the FUN stops, stop’ – the label did not work to prompt more responsible gambling behavior. More people decided to bet when the warning label was

shown (41.3%) compared to when there was no warning label (37.8%) (although this difference was not statistically significant) ([Newall et al., 2019e](#)).

The codes have not kept pace and are ineffective

The codes have not kept pace with developments in media, technology and gambling marketing. They do not protect children, young people and vulnerable adults (or consumers in general).

Exposure is very high and mostly happens in public fora

Children, young people and vulnerable adults have very high exposure to gambling advertising because gambling advertising is everywhere in the world around them, in all types of media, in online and offline public spaces, and at all times of the day and night. Most exposure to gambling advertising takes place in public fora where children and young people represent a proportion of a wider adult audience ([Final Synthesis Report, 2020](#)).

96% of 11-24-year-olds had seen gambling advertising, in an average of 7 different media, within the last month. There was no significant difference in exposure between an 11-year-old and someone who was 24 ([Macgregor et al., 2020](#)).

Most of what is appealing appeals to everyone

Most of what is appealing to children, young people and vulnerable adults is appealing to everyone. The rules prohibit suggesting that gambling can provide an escape from problems, can enhance personal qualities or that there is peer pressure to gamble. Even when it does not technically break the codes, gambling advertising uses many techniques to create an unrealistic view of gambling, hide risks and harms. It does this by associating gambling with desirable aspects of social life and positive outcomes, and producing good emotions.

Children were attracted to a wide variety of features within gambling advertising, beyond those as defined in the codes, and features which also appeal to adults. 'Appeal' cannot be 'defined in a simple binary term "does appeal to young people" or "does not appeal to young people", or in terms that classify appeal as being significantly different at the point at which children turn 16' ([Final Synthesis Report, 2020](#), p.46). The same applied to vulnerable adults.

Gambling advertising used many features which are memorable and appealing to children, young people and vulnerable adults, and which appeal to wider audiences also. This included:

- Characters (e.g., animated, actors or animals), songs and catchphrases, colour/design, humour and fun.
- Celebrity endorsement, and people, communities or other social activities (e.g. sports) audiences related to.
- Showcasing winners, producing a sense of belonging to an exclusive group, and personalisation or ownership (implying the ad was specifically talking to the individual or

that the winnings belonged to them) ([Critchlow et al., 2019](#); [Final Synthesis Report, 2020](#)).

Regulators have not kept up with new forms of advertising, online and in social media and for new forms of gambling, such as betting on Esports.

Gambling companies should not get to make the rules

In response to criticism, the gambling industry announced a 'voluntary whilst to whistle ban'. No gambling ads would be shown during live sport televised before the 9pm watershed, from five minutes before the start of a match and five minutes after (excluding horse and greyhound racing). The industry has claimed this has dramatically reduced the exposure of children. Sports gambling sponsorship means sports broadcasts offer gambling companies a loophole to avoid their self-imposed whistle to whistle ban ([Jones et al., 2019](#)). It is clear, given the extent of exposure and variety of techniques used, such a measure is wholly inadequate to protect children, young people and vulnerable adults ([Purves et al., 2020](#)).

VEHICLES FOR GAMBLING ADVERTISING

Sports is a very significant vehicle for exposure to gambling advertising, but is one of many. The most common self-reported exposure for those aged 11-24 was TV (including on-demand) (85%), shops on the high street (70%) and social media (66%) ([Macgregor et al., 2020](#)).

Sports

Gambling advertising is now so intimately linked to sport, it is correct to speak of the gambification of sport. Over three-quarters of young people (78%) and 86% of adults think that betting has become a normal part of sport ([Diohari et al., 2020](#)). [McGee \(2020\)](#) found that betting has become a normal part of being a sports fan for young men.

Gambling marketing in football cannot be avoided by fans of any age. A third of people correctly placed three or more sponsors to the corresponding football team (63% of young people and 62% of adults could place at least one team – 1% higher for children) ([Diohari et al., 2020](#)).

Club and event sponsorship by gambling companies dictated the amount of gambling marketing within TV broadcasts of sports. Most references were on the area-of-play, around the pitch border or on branded shirts, and there were little to no harm reduction messages. In football matches, there was a reference to gambling on average every 21 seconds ([Purves et al., 2020](#)). Half of the Premier League's 20 clubs and 17 out of the 24 Championship clubs have gambling companies on their shirts. The Champion's League is sponsored by Sky Bet, and gambling companies sponsor stadiums. Sports sponsorship also gives gambling companies exposure in markets outside the UK ([Burns et al., 2018](#)).

Gambling companies benefit from further exposure as sport-associated TV also becomes filled with their marketing. Gambling sponsorship (branding or logos) were on-screen

between 71% and 89% of BBC's Match of the Day runtime – of 10 seconds of football highlights, 7 to 9 seconds of those included gambling sponsorships ([Cassidy and Ovenden, 2017](#)).

In matchday programmes for Premier League and Championship matches, gambling marketing was found on over 20% of pages and over half of the child-specific sections had gambling marketing ([Sharman et al., 2019](#)).

Sponsorship has the same consequences in other major sports – boxing, rugby and more recently Formula 1. For example, during the boxing match between Tony Bellew and Oleksandr Usyk (11 November 2018) there was on average one gambling reference every 13 seconds ([Purves et al., 2020](#)). A visit to a gambling website shows it is possible to bet on any and every sport, anywhere in the world.

The [Gambling Commission \(2019\)](#) survey of young people (11-16) found half (49%) had heard or seen gambling sponsorship on radio or TV, 47% of young people had seen gambling adverts linked to a sports event and 46% had seen gambling sponsorships in sports venues – at least once a week.

Gambling companies make extensive use of sport within their advertising, building affinity with sports fans. Much gambling advertising online is sports-related. This includes on Twitter. Across the 888,000 Tweets analysed from 417 gambling related accounts over a 9-month period, all the top (most engaged with) Tweets referenced sport ([Smith et al. 2019](#)).

Social media

Children, young people and vulnerable adults said that gambling companies had an active online presence and because (particularly young) people spend a lot of time online, they are inevitably exposed to their marketing, especially on social media ([Macgregor et al., 2019](#)).

Gambling companies have been quick to take advantage of new forms of marketing online. In 2017 the gambling industry's social media spend was £149m, having tripled over the three years prior, and amounted to 10% of total gambling marketing spend ([Regulus Partners, 2018](#)).

The same rules apply to gambling advertising on social media as to offline, but regulators have not kept up with the developing online marketing landscape, which links with ease to the endless online opportunities to gamble. Children, young people and vulnerable adults are being engaged in new ways, with damaging content, 'prevalent but undetected - hidden in plain sight' ([Smith et al. 2019](#), p.4).

In 2016, there was already a well-developed gambling ecosystem on Twitter ([Miller et al., 2016](#)). This has continued to grow, consisting of bookmakers and online casinos, affiliates, and tipsters. [Bradley and Richard \(2019\)](#) found the seven major UK gambling brands tweeted between 89 and 202 tweets a day, with followers potentially receiving hundreds of messages per day – reaching millions of people globally.

In 2018, 41,000 children followed traditional gambling accounts on Twitter, making up 6% of their followers. 68% of gambling advertising Tweets raised regulatory concern ([Smith et al. 2019](#)). In their sample, [Killick and Griffiths \(2020\)](#) found over 90% of gambling company tweets contained no responsible gambling information.

Advertising of 'free' and 'matched' bets made up half of all Tweets from gambling accounts. The public and sharable nature of social media means that adverts aimed at enticing people to place a bet or gamble, which requires you to be over 18, can often be seen by those younger ([Smith et al. 2019](#)).

Affiliates largely post direct adverts for gambling ([Houghton et al., 2019](#)), often appearing to give consumers an expert comparison between different products or brands. Affiliates are financially rewarded for directing consumers to a specific brand or product, and it is not made clear they are 'actively pushing consumers towards products which benefit their own financial motives' ([Houghton et al., 2020, p.1](#))

A large part of social media strategy is for brand awareness. Such 'content marketing' is designed to build loyalty and awareness instead of inciting gambling right away, and often has no gambling reference. It is a more subtle form of advertising and looks much like other parts of social media, creating emotional responses rather than rational decision-making. It is designed to be shared widely. Such content often takes the form of memes, humour or discussion of topical events (e.g., sports), appealing to children and young people and adults alike. Another way is through presenting insider facts and stories that make consumers feel part of a niche group ([Smith et al. 2019](#)).

Social media gambling marketing is very seldom labelled as advertising and often does not contain direct gambling content. Children, young people and vulnerable adults may not identify that these are designed to profit a company ([Smith et al. 2019](#)). People were also more likely to see such content as trustworthy because it had been shared by 'people like them' ([Final Synthesis Report, 2020](#)).

Advertising on social media outside of Twitter is very under-researched. The [Gambling Commission's \(2019\)](#) survey of 11-16 year-olds found 59% of young people had seen gambling adverts on social media. The most popular social media to follow gambling companies on were Facebook, YouTube and Instagram with 7% each – Twitter on 4%. Among 11-16-year-olds who follow gambling companies on social media, 34% had spent their own money gambling and 24% of young people who have gambled online follow gambling companies on social media.

[Macgregor et al., 2019](#) found the most likely online exposure for children and young people and vulnerable adults to be in the form of video adverts whilst watching YouTube clips or ads appearing on Facebook feeds or on Snapchat (especially for online casino-type games).

Social media enables sophisticated, highly targeted placement of advertisements based on a user characteristics. Problem gamblers provided evidence of being constantly targeted through online advertising, particularly on social media, as a result of their gambling activity ([Smith et al. 2019](#)).

Children, young people, and vulnerable adults are not only exposed to gambling advertising on social media, but are also influenced by a form of advertising the regulation is currently not protecting them from – and which is unfair to consumers in general ([Hörnle et al., 2020](#))

Esports

There has been concern regarding the new forms of gambling associated with video-games, such as loot boxes, inclusion of casino-type games, gambling with skins and virtual items, skins lotteries and crash betting, etc. (e.g., [Macey and Hamari, 2018](#); [Zendle and Cairns, 2019](#)). Less attention has been paid to betting on esports. Esports is the competitive playing of video games, one of the fastest-growing entertainment industries in the world today. With this explosion in popularity, the gambling market is offering sportsbooks on esports events and matches. 7% of respondents in the [Gambling Commission's 2020](#) participation survey had ever bet on esports – 16 % of 18-24-year-olds and 15% of 25-34-year-olds.

The rise in esports betting inevitably brings with it advertising. In this way, gambling companies are expanding betting to a new demographic. International studies have found that the 'demographic of esports bettors makes them an attractive prospect as a consumer base'. While the majority of esports bettors are male, there are a higher proportion of females (around 40%), they tend to have higher household incomes and higher earning potential, to gamble daily, more and on more gambling activities than sports bettors. They also tend to be younger (under 35), including a proportion who are underage ([Abarbanel and Phung, 2019](#) p.640).

Esports advertising differs from traditional sports advertising, using animated and cartoon characters, as these are often part of the games played. Casino games and slots are also adopting this imagery to cross-sell to this new market. Another component is that many of professional players are below the legal gambling age themselves, and the use of such underage celebrities in advertising breaches the codes.

The [Smith et al. 2019](#) study of esports advertising on Twitter paints a picture of the 'wild west' of gambling adverts. With 74% of esports Tweets seemingly contravening regulations, it is concerning that 28% of those responding to these tweets in the UK are children, with 17% of UK followers of esports gambling accounts being children. Only 0.1% of the advertising content analysed contained any form of a warning label (Terms and Conditions, minimum age, or responsible gambling). Esports being attractive to younger audiences should mean stricter regulation, not the flaunting of the codes entirely.

Television

On TV, there were nearly as many daytime spots (12am-4pm) during weekdays as there were during Late Peak (8pm-11pm) ([Critchlow et al., 2019](#)). Children, young people and vulnerable adults said they were exposed through sponsorship of TV shows such as Jeremy Kyle, The Chase, I'm a Celebrity, Celebrity Big Brother and Home and Away, and the large number of adverts on channels such as ITV and Sky ([Macgregor et al., 2019](#)). Gambling advertising is targeting new female and young markets, with sponsorship of mainstream, primetime or more female-oriented TV programmes and tie-ins with mass-market brands

([Final Synthesis Report, 2020](#)), with some of this also disproportionately reaching those in constrained economic and social circumstances.

The High Street

Exposure on the high street must not be forgotten. All groups, including children, have high exposure through windows in bookmakers on the high street (especially in less affluent areas) and displays for scratchcards in shop windows and at point of sale ([Macgregor et al., 2019](#); [Final Synthesis Report, 2020](#)).

GAMBLING ADVERTISING HAS NO PUBLIC BENEFIT AND CONTRIBUTES TO HARM

Gambling companies say there is no evidence that gambling advertising causes harm. This is a tactic to prevent reform by demanding impossibly high standards of evidence or setting research questions that suit industry.

Any advertiser knows that the relationship between advertising and behaviour is not a direct, one-directional causal relationship. Rather, advertising influences emotions, beliefs and thoughts and behaviours, interacting with the characteristics of consumers, and their existing experiences with the product (e.g., [Vakratsas and Amber, 1999](#)). Emotions play an important role in advertising, and in our decision-making, which is often not rational (e.g., [Heath, 2012](#)). Some of advertising's effectiveness comes from it being part of the social environment, seen by many people and influencing shared perceptions (e.g., [Feltham, 2018](#)).

Based on the multi-faceted marketing strategies gambling companies use, they are well aware that advertising has a variety of purposes, to:

- Influence beliefs and emotions which may or may not lead to action by the consumer at a point in the future. Gambling advertising uses experiential and content marketing, sponsorship and mass TV advertising, to frame gambling as desirable and low risk, and create a connection with a brand, to build loyalty and profitability over time. This includes the many adverts with no specific gambling reference, frequently using humour or sports.
- Elicit direct action, e.g., through sign up offers or financial incentives.
- Interact with the experience a consumer already has with gambling or the company, to reinforce or expand current gambling (see [Final Synthesis Report, 2020](#), p.53-54) .

There is very high gambling brand awareness in children and young people

Gambling companies have been very successful in generating awareness of gambling among 11-24-year-olds, even when young people say they do not pay attention to gambling advertising. In the survey by [Macgregor et al. \(2020\)](#), those aged 11-24 knew more than

seven of the ten brands listed. 11-17-year-olds with lower awareness of marketing could identify the same number of gambling brands as others in their age group. In focus groups, young people spontaneously named 17 gambling companies and correctly identified between 6-9 companies from snippets of their logos ([Macgregor et al., 2019](#)). Recall of gambling brands was also high in an earlier study of UK high school students ([Wybron, 2018](#)).

43% of those aged 18-24 and 22% of those aged 11-17 had engaged with any gambling advertising in the last month (e.g., owning merchandise or discussing a gambling company) ([Macgregor et al., 2020](#)). 12% of young people (11-16), reported following gambling companies on social media ([Gambling Commission, 2019](#)).

Gambling advertising influences perceptions of gambling

People tended to acknowledge that gambling advertising portrayed gambling in untrue ways. But despite this, children, young people and vulnerable adults were drawn to a wide range of the features of gambling adverts, which elicited emotional responses and shaped beliefs about gambling, often in ways they were not fully conscious of and even when they did not recall adverts in detail.

- The sheer amount of gambling advertising created familiarity and acceptability, that everyone else is gambling.
- Ads created a sense that gambling was part of belonging to a desirable social group, including through celebrity endorsements, showing people having a good time together and making gambling seem like an integral part of other activities, like sport.
- People noticed the enjoyment and happiness adverts depicted as resulting from gambling, and humour made gambling seem like a less serious activity ([Final Synthesis Report, 2020](#)).
- Adverts broadened the appeal of gambling to new audiences, ‘attempting to create a shift in the perceptions of gambling as a pursuit mainly for older men, taking place behind closed doors in a bookmaker’s shop; to an activity with a much broader constituency including women and younger people, taking place in more open and sociable contexts’ ([Final Synthesis Report, 2020](#), p.65).

For vulnerable adults on struggling on low incomes, gambling was sometimes seen as a way to better their financial situation. Ads with complex bets, odds boosts or accumulators were particularly attractive to high risk or frequent gamblers, appealing to their belief they had a special skill ([Macgregor et al., 2019](#)).

Children and young people had a low understanding of risk, did not understand how odds worked and had exaggerated ideas of the likelihood of winning. They had a strong sense that gambling could be enjoyable, talking about it using words like ‘fun’, ‘thrills’, ‘rush’ and ‘excitement’ ([Macgregor et al., 2019](#)). In the survey, 46% said gambling is a rush, 40% gambling provides a good chance to win big with small money and 39% gambling is a way to make big money ([Macgregor et al., 2020](#)).

These findings echo those from reviews of international literature, with most research in this area from Australia ([Newall et al., 2019b](#); [Wardle, 2019](#)). Problem gamblers reported they were attracted to and influenced by ‘free-bets’ or ‘risk free’ gambles, in-play betting inducements and odds advertising – and especially when adverts were targeted to them via mobile phone notifications and emails. Children and young people were particularly susceptible to being misled by financial incentives and odds advertising, with some children incorrectly thinking financial incentives meant gamblers could never lose or meant free money, misunderstanding odds, being attracted to high odds and to advertising that showed betting as about skill (see [Newall et al., 2019b](#), p. 52). Children reported feeling the offers were so good they would be silly not to take them up, that the adverts made them want to bet and they would be missing out if they did not (see [Wardle, 2019](#), p.104-105).

As a result, researchers in both the UK and Australia conclude that gambling advertising is a factor influencing what children and young people believe about gambling, promoting a sense that it is risk-free and that everyone gambles, and encouraging some youth to want to gamble ([Final Synthesis Report, 2020](#); [Deans et al., 2017](#); [Pitt et al., 2016](#)).

The more people are exposed to gambling advertising the more likely they are to gamble

[Macgregor et al., 2020](#) used advanced statistical analysis of their survey to identify the extent to which exposure to gambling marketing is associated with future gambling activity in young people, compared with other factors such as age, gender and parent’s gambling. This showed the likelihood of a current non-gambler spending their own money on gambling in the near future increases significantly among those who have been exposed to a high volume of gambling advertising over the past month.

This mirrors the findings of a review of 27 studies from across the world that found that higher exposure to gambling advertising was related to more favourable attitudes towards gambling, with greater intentions to gamble and to gamble more frequently and spend more money on gambling ([Bouguettaya, 2020](#)).

Advertising gets vulnerable people to gamble when they had not intended to or to gamble more

Gambling advertising has a cumulative effect over time. But as is expected based on how advertising works, a more immediate response to a gambling advert was more often the case from those already interested in or experienced with the product – gamblers and, especially, at risk or and problem gamblers (see [Lole, 2020](#)).

Problem gamblers described the difficulty of managing their gambling when they were surrounded by gambling advertising in public spaces, as well as feeling they were as being directly targeted, online and via their phones, with incentives and inducements, combined with the unlimited opportunities and easy accessibility of online/mobile gambling ([Final](#)

[Synthesis Report, 2020](#)). The same has been found in international studies ([Newall et al., 2019b](#))

A recent Australian study tracked real life betting behaviour and exposure to gambling advertising, rather than relying on what gamblers remembered. Exposure to advertising was followed by more spend on gambling for all groups of gamblers, and push notifications on mobile phones resulted in larger and riskier bets. The researchers also found financial incentives led to sports bettors taking on riskier bets, but thinking these bets to be lower risk ([Newall et al., 2019b](#); [Browne et al., 2019](#), [Russell et al., 2018](#)). A study of sports bettors in Spain undergoing treatment for gambling disorder found 'the use of cognitive biases by bookmakers made it harder for sports bettors to stop gambling, and constantly facilitated their relapse' ([Lopez-Gonzalez et al., 2019](#), p.421).

Seven per cent of 11-16 year-olds said that an advert or sponsorship had prompted them to spend money on gambling when they were not otherwise planning to ([Gambling Commission, 2019](#)). There is evidence that it is vulnerable children and young people that are more likely to act on gambling advertising ([Derevensky et al., 2009](#)).

Advertising is one of many interacting risk factors that need to be addressed to prevent gambling harm

Much of the advertising of gambling companies, in particular financial incentives, presentation of odds, online and social media, is unfair to consumers in general and exploitative of children, young people and vulnerable adults.

Beyond this, gambling companies are spending a great deal of money on sophisticated strategies to expand the appeal of gambling to new groups of people, to embed gambling as part of everyday social and public life, to associate it with desirable outcomes and to hide risk. There is evidence that they are succeeding. But gambling is not just another leisure activity. It is risky and causes harm, for individuals and society ([Gambling Commission, 2018](#)). Commercial gambling profits come from money extracted from people and communities ([Newall, 2019a](#)), and disproportionately from those experiencing social and economic difficulties.

Studies have repeatedly shown that advertising for alcohol and tobacco contributes to drinking or smoking in the general population, and in young people, as one risk factor interacting with others. As use of alcohol and tobacco are harmful activities, this has led to strict controls on advertising.

Gambling research does not have comparable longitudinal studies, but gambling advertising largely works in the same way, with increased exposure increasing the likelihood of gambling. As one of many measures to reduce the risk of harm for the public as a whole and for all children and younger people, gambling advertising must be controlled. Society determines that children and young people should be protected, and there is evidence those 18-24 are especially vulnerable to risky behaviour ([Valentine, 2016](#)).

There has already been a shift in the patterns of gambling in those under 35, from less risky lottery play in older generations, to slots, casino games and in-play betting, online, and via smartphones – and problem gambling rates are highest in age groups under 35 ([Gambling Commission, 2020](#)).

The evidence shows that it is unlikely that exposure to a gambling advert on its own is likely to cause someone to start gambling or to experience harm. But that does not mean, as the gambling companies wish to argue, that gambling advertising should not be controlled. Advertising is a factor that interacts with, for example, family and peer group attitudes, among others, to effect gambling behaviour ([Parrado-González and León-Jariego, 2020](#); [Macgregor et al., 2020](#)).

People experiencing vulnerabilities, both those under 24 and adults, are more susceptible to influence by gambling advertising, to take immediate action, to gamble more, more riskily and when they had not intended to. Difficulties with gambling, in children, young people and adults, is associated with a wide range of vulnerabilities, including difficulties with education, mental health problems, substance misuse, conduct problems, low socioeconomic status, family difficulties and adverse life events. Gambling advertising exploits and exacerbates these vulnerabilities, existing problems and harms.

There is good evidence that, for a considerable number of people, gambling advertising substantially contributes to problem gambling ([Final Synthesis Report, 2020](#); [Newall et al., 2019b](#); [Browne et al., 2019](#), [Russell et al., 2018](#); [Lopez-Gonzalez et al., 2019](#)). The impact on this group should not be ignored. A very significant amount of gambling profits come from problem gamblers. The gambling industry, as well as other industries that benefit from its advertising and sponsorship (e.g., broadcast, football, sports) are contributing to the harmful addiction of gamblers ([Jones et al., 2019](#)).

Consumer protection messages should be standardised in UK gambling adverts. ([Critchlow et al., 2020b](#)) People said that as well as gambling-related public information adverts, current gambling marketing and websites need striking warnings and clear information on risk, as visible as the gambling promotion itself ([Macgregor et al., 2019](#)). However, this is not enough, as evidence shows young people, in particular, paid more attention to positive expected outcomes than negatives ones and warning messages do not balance out gambling marketing ([Valentine, 2016](#)).

Children, young people and vulnerable adults saw gambling marketing as worse and more exploitative than alcohol and tobacco marketing, which were less intrusive and visible, even though gambling could be as destructive to individuals, families and communities. People did not understand why there was this difference in advertising. They said they could see no benefit to gambling advertising in public spaces, but rather harm and exploitation ([Macgregor et al., 2019](#)).

NOTE ON HOW THE SUMMARY WAS PUT TOGETHER

The purpose is to summarise in the evidence in a way that would make it accessible to the public, rather than to conduct a further academic literature review. This is because there have been claims that there is insufficient evidence that the regulation of gambling marketing needs to change when there is a great deal of evidence.

There have been several academic literature reviews of the evidence on gambling marketing. This includes critical reviews by [Park et al. \(2014\)](#) and by [Binde \(2014\)](#), and a review of empirical studies between 2014-2018 by [Newall et al. \(2019b\)](#), which built on the two preceding reviews.

The most extensive research programme on '[The effect of gambling marketing and advertising on children, young people and vulnerable adults](#)' in Great Britain published its final report in March 2020. This included traditional mass media, online and social media, sports sponsorship, diary exercises, interviews, focus groups and a survey. It was conducted by a research teams from Ipsos Mori with Ebiquity, University of Edinburgh, University of Bristol and the Centre for Analysis of Social Media at Demos, as well as the University of Stirling, with ScotCen Social Research, the University of Glasgow and the University of Warwick.

This research programme was commissioned by GambleAware on behalf of the Gambling Commission, and had oversight by the Gambling Commission and Advertising Standards Authority/Committee of Advertising Practice.

To compile this summary the focus was on the existing reviews and findings of this research programme, as these comprehensively cover the evidence. A search was done for research published in since 2019, of relevance to the United Kingdom. The results of the Gambling Commission's own surveys are also used.

There is a vast amount of literature on how advertising works, from various theoretical perspectives and disciplines. The framework used here is that used by the Gambling Commission sponsored research programme. This is the most useful in this context, as it is largely based on applied marketing – i.e., in practical terms, what companies 'are doing' with marketing and advertising today.

For the sake of brevity, findings refer to Great Britain/ United Kingdom unless otherwise specified. It is assumed that findings from Great Britain are likely to generally apply to the United Kingdom.

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QUOTES [SOURCES TO COME]

“The internet. Internet’s the biggest one I think because you’re constantly there.” (Young person, aged 15-18)

When you’re on YouTube or something, you get random advertising that you have to watch for at least 6 seconds...you can just kinda tell by the logo what they are.” (Young person, aged 14-19)

“Social media’s quite big for it. On Facebook, quite a lot o’ the time I see articles popping up. I think it’s like ‘Lucky Spins’ or something, the website, and it’s like ‘Oh, and you can click on this site to get 100 free spins’.” (Young person, aged 13-18)

“It gets on your phone...All the previous (ones) mentioned, like Ladbrokes, William Hill, Paddy Power etc.” (Young person, aged 18-23)

“Even some o’ the apps on your phone. You know how you can get the games – the apps on your phone? – and it’s like bingo or ... roulette, or fruit machines. It’s everywhere. It is everywhere, even in a game on a phone.” (Mental health group 1)

“There are like hundreds on ITV though. Like there’s loads.” (Young person, aged 19-23)

“Like see if you’re up late and you’re watching TV?, normally most o’ the channels on Sky is casino bets through the TV, so you have to phone in and place bets as well, so it’s on TV as well.” (Young person, aged 16-19)

“And they play it on the TV at the right times. They always pick the most busiest time when folk are having their dinner – maybe like 6, 7 o’clock – and they’ll put it in between when folk are watching their favourite programmes, such as like Coronation Street, The Chase or something.” (Young person, aged 16-19)

It’s advertised every morning, before Jeremy Kyle.” (Mental health group 1)

“You see it everywhere...you could be sitting, as I say, watching the STV news, [and] the next advert’s gambling. Read the newspaper – like the adverts earlier on – ‘Bet £10 tonight. Win £70.’ It’s everywhere. You cannae hide from it.” (Problem gambler group)

“Because it’s basically advertised in all your local shops that sell you. It’s all around in the town an’ that. You’ve got your bookies, you’ve got your bingo, you’ve got your scratchcards, the lottery tickets an’ all that. They’re everywhere.” (Young person, aged 16-19)

It comes across as very harmless, it’s just a game. They try to detract from the fact that its gambling and you could lose money.

Young Person, 20-21

There’s some truth to it because you might win, you might not... but it’s like you’re not guaranteed. So it’s not technically false advertising, but not technically true advertising either.

Young Person, 13-18

Harry Redknapp advertises gambling...it can't be such a bad thing (to do).
Male, 36, Glasgow, routinely struggling financially

It says play happy around the clock, it makes it seem like you can just keep playing and it's fun when in reality you could lose money
Birmingham, male, age 16

The dangers are never shown whereas the possibility of winning is their key selling point.
They only use their catchy advertising to promote the fun, it's not a balanced view
London, male, age 17

I was a kid when I first started seeing that [Foxy Bingo advert], so I just thought it was funny, and then I was like, 'Oh, cannae wait .. cannae wait till I'm old enough to play that.
Young person, aged 16-19

Yeah it [the warning] presents itself right at the end but it's always minor, it's always at the very end, it's never a prominent discussion of the whole ad.
Young person, aged 19-23