

Gambling marketing in Great Britain: What needs to change and why?

June 2024

1. Introduction

This document outlines the evidence on why further regulations on gambling marketing are needed and what specific policies could deliver this. For further information on the evidence behind each policy ask, please refer to the additional detail within the appendix.

The policy recommendations outlined within this report are three examples which would produce a high level of impact and can be implemented quickly by the UK Government.

In particular, these asks are closely related to the contextual moment of the Men's UEFA European Football Championship due to the surge in advertising exposure and increase of gambling harms during this time.

2. Executive summary

One of the foundational principles of the 2005 Gambling Act was for “children and vulnerable people” to be protected¹. However, the current approach to regulating gambling marketing is failing to protect them, with 96% of children and young people (CYP)² exposed to gambling adverts each month. This will lead to more people experiencing gambling harm in the future and is exacerbating harm among those worst affected now.

With an estimated 4.8 million adults in Great Britain (GB) experiencing ‘problem gambling’ (Problem Gambling Severity Index (PGSI) score of 8+) and/or negatively affected by someone else's gambling³, more needs to be done to prevent harm at source. Gambling harms are much broader than just financial, with gambling found to negatively affect someone's relationship, mental and physical health, culture, employment, education and criminal activity⁴. For example, higher rates of gambling harms are associated with worse mental health⁵, meaning

¹ The Gambling Act 2005: A bet worth taking? - Culture, Media and Sport Committee Contents
<https://publications.parliament.uk/pa/cm201213/cmselect/cmcmds/421/42103.htm>

² The effect of marketing and advertising on children, young people and vulnerable people Quantitative Research Report
https://www.begambleaware.org/sites/default/files/2020-12/the-effect-of-gambling-marketing-and-advertising_quants-report.pdf

³ Annual GB Treatment and Support Survey 2022
<https://www.gambleaware.org/sites/default/files/2023-07/GambleAware%20Treatment%20and%20Support%20Report%20July%202022.pdf>

⁴ Gambling-related harms evidence review: summary
<https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary-2>

⁵ Gambling and Mental Health: Analysis of the Annual GB Treatment and Support Survey
https://www.gambleaware.org/sites/default/files/2023-12/GambleAware%20Secondary%20Analysis-%20Final%20Report%20June%202023%20-%20Alma%20Economics_0.pdf

gambling is exacerbating the mental health crisis and compounding pressure on an overburdened National Health Service.

The White Paper ‘High Stakes: Gambling Reform for the Digital Age’⁶, published in April 2023, sets out the link between gambling marketing and harm, highlighting the ‘dose-response’ effect where greater exposure to advertising increases participation and harm. However, the White Paper does little to address this, with the lack of regulation on gambling marketing a missed opportunity to reduce gambling harm in Great Britain, particularly in regard to protecting CYP. This sentiment is supported by a range of voices including parliamentarians⁷, academics⁸, those with lived experience of gambling harms⁹, and the majority of the public¹⁰. GambleAware are calling for restrictions that reflect the strong evidence we have already, rather than waiting on further evidence of the damage marketing is causing to make changes.

There needs to be an approach to reduce gambling harm that focuses on commercial determinants of health at a whole-population level¹¹. A recent study gathered widespread consensus from international experts on effective interventions to prevent gambling harms, with many interventions being related to tighter regulations on marketing¹². This works by reducing exposure to products linked with harm to everyone in the population, rather than focusing responsibility on individuals to take extra precautions.

There are six well-evidenced issues which make changes in gambling marketing regulation urgent and critical:

1. There is a high exposure of gambling marketing among Children and Young People (CYP) which normalises the activity and increases the risk of harm in later life.
2. Gambling marketing is exacerbating harm of over a million individuals experiencing ‘problem gambling’ (PGSI 8+).
3. There is strong public support for increased gambling marketing regulation due to concerns over the amount of advertising and its impact on CYP.

⁶ High Stakes: Gambling Reform for the Digital Age
https://assets.publishing.service.gov.uk/media/644923b5814c6600128d0723/1286-HH-E02769112-Gambling_White_Paper_Book_Accessible1.pdf

⁷ MPs call for cut to football gambling adverts to shield children from exposure
<https://committees.parliament.uk/committee/378/culture-media-and-sport-committee/news/199092/mps-call-for-cut-to-football-gambling-adverts-to-shield-children-from-exposure/>

⁸ ‘No evidence of harm’ implies no evidence of safety: Framing the lack of causal evidence in gambling advertising research
<https://onlinelibrary.wiley.com/doi/10.1111/add.16369>

⁹ The views and evidence of people with lived experience of gambling harms: A response to the DCMS Gambling Act Review
<https://gamfam.org.uk/wp-content/uploads/2021/05/WeAretheEvidenceToo-FINAL-0002.pdf>

¹⁰ Ipsos research explores barriers to opening up about experiencing problems with gambling
<https://www.ipsos.com/en-uk/ipsos-research-explores-barriers-opening-about-experiencing-problems-gambling>

¹¹ Public health approaches to gambling: a global review of legislative trends
[https://www.thelancet.com/pdfs/journals/lanpub/PIIS2468-2667\(23\)00221-9.pdf](https://www.thelancet.com/pdfs/journals/lanpub/PIIS2468-2667(23)00221-9.pdf)

¹² Policies and interventions to reduce harmful gambling: an international Delphi consensus and implementation rating study
[https://www.thelancet.com/pdfs/journals/lanpub/PIIS2468-2667\(22\)00137-2.pdf](https://www.thelancet.com/pdfs/journals/lanpub/PIIS2468-2667(22)00137-2.pdf)

4. There is a lack of effective health messaging on gambling adverts to inform consumers of the risk of harms and a lack of consistency in signposting to support.
5. The over-reliance on self-regulatory mechanisms has proven ineffective at ensuring best practice (e.g., issues with the Industry Group for Responsible Gambling (IGRG) code of socially responsible advertising, or the much-delayed cross-sport sponsorship code).
6. There is sufficient evidence to justify further restrictions given greater exposure to advertising increases participation in gambling, which leads to a greater risk of harm. Stronger evidence is unlikely given methodological limitations in this domain. The evidence base in GB outstrips many other EU countries that have greater restrictions on marketing.

GambleAware has identified three key priority measures for the Government to take related to gambling marketing:

1. A pre-watershed ban¹³ on all broadcast gambling advertising (TV/Video On Demand/Radio) including broadcast sponsorships. Why?

- CYP are most likely to report having seen gambling advertising on TV compared with other channels¹⁴, but broadcasters are unable to target content away from CYP and those experiencing harms¹⁵. Other jurisdictions have used a pre-watershed ban to address this high level of exposure¹⁶
- There is a high level of public support for this type of regulatory change with 72% of adults in GB agreeing that advertising about gambling should be banned during the watershed ¹⁷.
- Industry self-regulation, via the IGRG Code, does not go far enough. The “whistle-to-whistle” ban only covers 2% of gambling references in football¹⁸ and leads to increased advertising in the unrestricted period due to the partial nature of the ban¹⁹. Therefore, Government intervention is required to make a real change.
- Gambling companies are among the heaviest advertisers on radio during “school run” hours when millions of children are in the car²⁰

¹³ Note to reader. The watershed runs between 9:00pm and 5:30am.

¹⁴ Young People and Gambling 2023

<https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-2023/ypg-2023-attitudes-towards-and-exposure-to-gambling-exposure-to-gambling>

¹⁵ Minister Weerwind bans untargeted advertising for online games of chance

<https://www.government.nl/latest/news/2023/04/19/minister-weerwind-bans-untargeted-advertising-for-online-games-of-chance>

¹⁶ Information for the Public

<https://www.gov.ie/en/organisation-information/2ceb2-information-for-the-public/#advertising>

¹⁷ Ipsos research explores barriers to opening up about experiencing problems with gambling

<https://www.ipsos.com/en-uk/ipsos-research-explores-barriers-opening-about-experiencing-problems-gambling>

¹⁸ Examining the frequency and nature of gambling marketing in televised broadcasts of professional sporting events in the United Kingdom

<https://www.sciencedirect.com/science/article/pii/S00333350620300512>

¹⁹ How did the ‘whistle-to-whistle’ ban affect gambling advertising on TV? A live football matching study

<https://www.tandfonline.com/doi/full/10.1080/16066359.2024.2355183>

²⁰ Gambling firms among heaviest radio advertisers during school run

<https://www.theguardian.com/society/2021/nov/08/gambling-firms-among-heaviest-radio-advertisers-during-school-run>

2. All gambling marketing to include independent evidence-led health warnings with effective signposting to support. Why?

- Effective safer gambling messaging is a low-cost and high-reach intervention that may help to mitigate gambling-related harm²¹.
- CYP currently have a high recall of seeing gambling adverts but are much less likely to recall the health messaging on them²². This is problematic given most advertising by operators makes gambling seem like “harmless fun”²³.
- Operator-led safer gambling messaging has been shown to be ineffective. It therefore requires updates, with evidence-led guidelines developed independent of industry input, as is the plan for the cross-departmental working group on safer gambling messaging.
 - Research shows it lacks effectiveness²⁴²⁵, can stigmatise those experiencing harms²⁶ and can even risk contributing to an increase in gambling²⁷.
 - Other messages which focus more on the risks of gambling are more impactful, more memorable, and more likely to prompt behaviour change²⁸.
 - GambleAware has produced guidelines²⁹ to replace current industry-led marketing messages with three new health warnings “Gambling comes at a cost”, “Gambling can be addictive” and “Gambling can grip anyone” alongside guidelines for more visible and consistent signposting to GambleAware for advice, tools and support.

3. A ban on gambling marketing at sports events (including removal of sponsorships from sports clothing, merchandise, and wider stadium). Why?

²¹ Visibility of age restriction warnings, harm reduction messages and terms and conditions: a content analysis of paid-for gambling advertising in the United Kingdom. <https://www.sciencedirect.com/science/article/pii/S0033350620301098?via%3Dihub>

²² The effect of marketing and advertising on children, young people and vulnerable people Quantitative Research Report https://www.begambleaware.org/sites/default/files/2020-12/the-effect-of-gambling-marketing-and-advertising_quants-report.pdf

²³ New Developments in Gambling Marketing: the Rise of Social Media Ads and Its Effect on Youth <https://link.springer.com/article/10.1007/s40429-022-00457-0>

²⁴ “When the Fun Stops, Stop”: An analysis of the provenance, framing and evidence of a ‘responsible gambling’ campaign <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0255145>

²⁵ Evaluation of the ‘take time to think’ safer gambling message: a randomised, online experimental study <https://www.cambridge.org/core/services/aop-cambridge-core/content/view/9CFD881028DB7C1CF0E83AD6AEBD67A/S2398063X23000027a.pdf/evaluation-of-the-take-time-to-think-safer-gambling-message-a-randomised-online-experimental-study.pdf>

²⁶ Editorial: Gambling, stigma, suicidality, and the internalization of the ‘responsible gambling’ mantra <https://www.frontiersin.org/journals/psychiatry/articles/10.3389/fpsy.2023.1214531/full>

²⁷ Impact of the “when the fun stops, stop” gambling message on online gambling behaviour: a randomised, online experimental study <https://www.thelancet.com/action/showPdf?pii=S2468-2667%2821%2900279-6>

²⁸ Executive summary: Improving safer gambling messaging on operator advertising https://www.gambleaware.org/sites/default/files/2024-05/GambleAware%20-%20Improving%20safer%20gambling%20messaging%20on%20operator%20adverts%20-%20Executive%20summary_1.pdf

²⁹ GambleAware Safer Gambling Messaging and Signposting Guidelines <https://www.gambleaware.org/sites/default/files/2024-06/GambleAware%20Safer%20Gambling%20Messaging%20and%20Signposting%20Guidelines%20May%202024.pdf>

- Sports events are the fourth highest channel for advertising awareness among CYP³⁰, and the association between gambling and sport is particularly appealing to this cohort³¹. This association allows gambling companies to borrow the positive and healthy image surrounding sports, which distracts from its potential for harm³²
- Parliamentarians have recently recognised the need for sports fans to be more aware of the harms involved in gambling³³.
- There is recognition by football fans themselves there are too many gambling advertisements and sponsorships in football³⁴. These sponsors have been found to negatively impact perceptions towards both the gambling brand and the team³⁵.

2. Appendix

2.1 Overview of the problem (appendix)

1) There is a high exposure of gambling marketing among CYP which normalises the activity and increases the risk of harm in later life.

- With £1.5 billion spent by gambling companies on marketing each year³⁶, children's online spaces are "saturated" with gambling-like content and advertising³⁷. 96% of those aged 11-24 have seen gambling marketing in the last month³⁸ whilst Ofcom data shows content encouraging gambling is in the top 5 harms experienced by those aged 13-17s online³⁹.

³⁰ Young People and Gambling 2023

<https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-2023/ypg-2023-attitudes-towards-and-exposure-to-gambling-exposure-to-gambling>

³¹ Parent and child perceptions of gambling promotions in Australian sport

<https://ro.uow.edu.au/cgi/viewcontent.cgi?article=2697&context=buspapers>

³² A bad bet for sports fans: the case for ending the "gamblification" of sport

<https://www.tandfonline.com/doi/full/10.1080/14413523.2023.2260079#:~:text=The%20integration%20of%20gambling%20cultures,connections%20between%20the%20two%20activities.>

³³ Gambling advertising in sport

<https://commonslibrary.parliament.uk/research-briefings/cdp-2024-0051/#:~:text=The%20report%20noted%20the%20exposure,with%20more%20safer%20gambling%20messaging.>

³⁴ Football fans gambling harms prevention campaign

<https://www.opinium.com/wp-content/uploads/2022/11/OP22453-Freuds-GambleAware-Preventing-gambling-harms-Website-Final-Report.pdf>

³⁵ Are gambling company sports sponsorships a losing game? Investigating consumer responses on gambling, brand and team outcomes

<https://www.tandfonline.com/doi/abs/10.1080/02650487.2024.2350852>

³⁶ GAMBLING ADVERTISING AND MARKETING SPEND IN GREAT BRITAIN, 2014-17

<https://www.begambleaware.org/sites/default/files/2020-12/2018-11-24-rp-ga-gb-marketing-spend-infographic-final.pdf>

³⁷ Qualitative Research on the Lived Experience and Views of Gambling among Children and Young People

https://www.gambleaware.org/sites/default/files/2024-04/Exploring%20the%20Lived%20Experience%20and%20Views%20of%20Gambling%20among%20Children%20and%20Young%20People_fi

[nal_0.pdf](https://www.gambleaware.org/sites/default/files/2024-04/Exploring%20the%20Lived%20Experience%20and%20Views%20of%20Gambling%20among%20Children%20and%20Young%20People_fi)

³⁸ The effect of marketing and advertising on children, young people and vulnerable people Quantitative Research Report

https://www.begambleaware.org/sites/default/files/2020-12/the-effect-of-gambling-marketing-and-advertising_quants-report.pdf

³⁹ Online Nation 2023. https://www.ofcom.org.uk/data/assets/pdf_file/0029/272288/online-nation-2023-report.pdf

- Marketing normalises gambling as an everyday activity and something that is both harmless and enjoyable⁴⁰ among CYP, with positive emotions more likely among CYP compared to adults after exposure⁴¹. There is an established link between early exposure to gambling and risk of experiencing harm later in life⁴². When controlling for other variables one study found those with greater advertising exposure were 2.3 times more likely to experience “pathological gambling”⁴³.
- Evidence is also showing those aged 18-24 who gamble, who have grown up being constantly exposed to gambling marketing, are 4 times more likely to experience ‘problem gambling’ (20% vs 5%), and this rate of harm is growing (up from 12% in 2019 to 20% in 2023)⁴⁴.

2) Gambling marketing is exacerbating harm for over a million individuals experiencing ‘problem gambling’ (PGSI 8+):

- The overall prevalence of gambling harms varies based on the measure of harm used and methodology underpinning estimates⁴⁵ but GambleAware’s most recent estimates from 2023 (which reflect those found within the Gambling Commission’s latest experimental prevalence research which will become official statistics⁴⁶) show that up to 1.5m adults in Great Britain are experiencing ‘problem gambling’ (2.9% PGSI 8+)⁴⁷
- Those already experiencing harm from their current gambling activity are more likely to be influenced by gambling advertising, and as such experience more harms as a result⁴⁸. GambleAware’s new research⁴⁹ has shown those experiencing ‘problem gambling’:
 - Are 40 times more likely to have spent more money or time on gambling as a result of gambling adverts (40% PGSI 8+ vs 1% PGSI 0)

⁴⁰ The Effect of Gambling Marketing and Advertising on Children, Young People and Vulnerable People: Qualitative Research Report https://www.begambleaware.org/sites/default/files/2020-12/the-effect-of-gambling-marketing-and-advertising_qualis-report.pdf

⁴¹ Priming Young Minds: The Appeal of Gambling Advertising to Children and Young People <https://www.journals.uchicago.edu/doi/abs/10.1086/729290?journalCode=jacr>

⁴² Annual GB Treatment and Support Survey 2022 <https://www.gambleaware.org/sites/default/files/2023-07/GambleAware%20Treatment%20and%20Support%20Report%20July%202022.pdf>

⁴³ Exposure to Gambling Advertisements and Gambling Behavior in Young People <https://link.springer.com/article/10.1007/s10899-016-9606-x>

⁴⁴ Annual GB Treatment and Support Survey 2022 <https://www.gambleaware.org/sites/default/files/2023-07/GambleAware%20Treatment%20and%20Support%20Report%20July%202022.pdf>

⁴⁵ Methodological factors affecting estimates of the prevalence of gambling harm in the United Kingdom: A multi-survey study https://www.gambleaware.org/sites/default/files/2021-05/Methodology_Report_%28FINAL_14.05.21%29.pdf

⁴⁶ Gambling participation and the prevalence of problem gambling survey: Final experimental statistics stage (Step 3) <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/gambling-participation-and-the-prevalence-of-problem-gambling-survey-final>

⁴⁷ Annual GB Treatment and Support Survey 2023. Not currently publicly available (to be published later in 2024)

⁴⁸ What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature <https://www.sciencedirect.com/science/article/pii/S00333350622003420>

⁴⁹ Ipsos research explores barriers to opening up about experiencing problems with gambling <https://www.ipsos.com/en-uk/ipsos-research-explores-barriers-opening-about-experiencing-problems-gambling>

- Are more likely to feel they can't escape adverts about gambling (55% vs 32%), overwhelmed by the amount of adverts about gambling (52% vs 20%) and that adverts about gambling make it hard for them to cut down (54% vs 7%).
- Gambling advertising has also been shown to prompt consumers to start or re-start gambling, or to increase their gambling stakes⁵⁰. It has also been shown as a key barrier that prevents individuals from cutting down⁵¹.
- Due to the strong association between sport and gambling this can also mean some struggle with their gambling during large events like the World Cup or Euros⁵². Research has previously shown tournaments can act as a 'temptation' for those who had previously attempted to quit. GambleAware's⁵³ new research supports this with half of those experiencing 'problem gambling' (PGSI 8+) agreeing the amount of adverts about gambling makes it hard for them to watch a game of professional football without wanting to place a bet (51%). Previous polling for the 2022 World Cup has shown football fans experiencing "problem gambling" (PGSI 8+) were⁵⁴:
 - 11 x more likely to feel pressured to bet on football at the upcoming World Cup (PGSI 8+ 67% vs PGSI 0 6%)
 - 10 x more likely to feel anxious thinking about how much they might lose betting on the World Cup (PGSI 8+ 73% vs PGSI 0 7%)
 - 9 x more likely to feel like they can't enjoy the football World Cup without placing a bet on (PGSI 8+ 73% vs PGSI 0 8%)

3) There is strong public support for increased gambling marketing regulation due to concerns over the amount of advertising and its impact on CYP:

- New GambleAware polling⁵⁵ shows a high level of discontent in this area with:
 - 67% agreeing there are too many advertisements about gambling
 - 67% worrying about the impact of advertisements about gambling on CYP
 - 63% feeling the amount of gambling advertisements found everywhere makes it seem "harmless" to CYP

⁵⁰ Understanding how consumers engaged with gambling advertising in 2020

<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/understanding-how-consumers-engaged-with-gambling-advertising-in-2020>

⁵¹ GambleAware: Audience Segmentation 2023

<https://www.gambleaware.org/sites/default/files/2024-01/GambleAware%20-%20Audience%20Segmentation%20-%20Report.pdf>

⁵² Annual GB Treatment and Support Survey 2022

<https://www.gambleaware.org/sites/default/files/2023-07/GambleAware%20Treatment%20and%20Support%20Report%20July%202022.pdf>

⁵³ Ipsos research explores barriers to opening up about experiencing problems with gambling

<https://www.ipsos.com/en-uk/ipsos-research-explores-barriers-opening-about-experiencing-problems-gambling>

⁵⁴ Preventing Gambling Harms in Football Fans

<https://www.opinium.com/gambleaware/>

⁵⁵ Ipsos research explores barriers to opening up about experiencing problems with gambling

<https://www.ipsos.com/en-uk/ipsos-research-explores-barriers-opening-about-experiencing-problems-gambling>

- Results from the Football Supporters Association Annual Survey for 2023 also demonstrate the strong pushback by fans on gambling marketing⁵⁶, with:
 - 73% concerned about the amount of gambling advertising and sponsorship around football
 - 66% feel gambling sponsorship should be banned in football
- This is supported by previous polling for the 2022 FIFA World Cup data among football fans showing⁵⁷:
 - 64% agree there are too many gambling advertisements / sponsorships in football
 - 61% agree there are too many gambling advertisements during the World Cup & other international football tournaments

4) There is a lack of effective health messaging on gambling adverts to inform consumers of the risk of harms and lack of consistency when signposting to support:

- Independent evidence-based health warnings are a low-cost and high-reach intervention that may help to mitigate gambling-related harm⁵⁸.
- GambleAware-commissioned research has shown that 96% of those aged 11-24 saw any gambling marketing advertisements in a typical month. In contrast, only 38% were aware of any health information or warnings on gambling adverts⁵⁹. There needs to be a more even balance between messaging that presents gambling as “harmless fun” compared to being something that can (and does) harm anyone.
- Operator-led safer gambling messaging lack effectiveness^{60,61}, can actually encourage gambling⁶² and can stigmatise those experiencing gambling harms⁶³. There is a need to move beyond messages like “gamble responsibly” that place all the responsibility on the individual, marking those who experience harm as “irresponsible”⁶⁴.

⁵⁶ National Supporters Survey 2023

<https://thefsa.org.uk/news/national-supporters-survey-2023-more-stats/>

⁵⁷ Preventing Gambling Harms in Football Fans

<https://www.opinium.com/gambleaware/>

⁵⁸ Visibility of age restriction warnings, harm reduction messages and terms and conditions: a content analysis of paid-for gambling advertising in the United Kingdom. <https://www.sciencedirect.com/science/article/pii/S0033350620301098?via%3Dihub>

⁵⁹ The effect of marketing and advertising on children, young people and vulnerable people Quantitative Research Report https://www.begambleaware.org/sites/default/files/2020-12/the-effect-of-gambling-marketing-and-advertising_quants-report.pdf

⁶⁰ “When the Fun Stops, Stop”: An analysis of the provenance, framing and evidence of a ‘responsible gambling’ campaign <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0255145>

⁶¹ Evaluation of the ‘take time to think’ safer gambling message: a randomised, online experimental study

<https://www.cambridge.org/core/services/aop-cambridge-core/content/view/9CFD881028DB7C1CFCE83AD6AEBD67A/S2398063X23000027a.pdf/evaluation-of-the-take-time-to-think-safer-gambling-message-a-randomised-online-experimental-study.pdf>

⁶² Impact of the “when the fun stops, stop” gambling message on online gambling behaviour: a randomised, online experimental study <https://www.thelancet.com/action/showPdf?pii=S2468-2667%2821%2900279-6>

⁶³ Editorial: Gambling, stigma, suicidality, and the internalization of the ‘responsible gambling’ mantra <https://www.frontiersin.org/journals/psychiatry/articles/10.3389/fpsy.2023.1214531/full>

⁶⁴ ‘Odds Are: They Win’: a disruptive messaging innovation for challenging harmful products and practices of the gambling industry <https://www.sciencedirect.com/science/article/pii/S0033350623002937>

- The industry-led code for Socially Responsible Advertising⁶⁵ by the Industry Group for Responsible Gambling (IGRG) are not sufficient. They recommend taglines developed almost 20 years ago and do not take into account international best practice. For example, research from other jurisdictions have also found more effective alternatives, such as 7 taglines being mandated in Australia⁶⁶ and research in Belgium finding “What does gambling cost you? Stop in time” was more effectively communicating the harms of gambling than messages like ‘play smart’ or ‘play responsibly’⁶⁷.
- Based on GambleAware-commissioned research⁶⁸, GambleAware has produced guidelines⁶⁹ to replace current industry marketing messages with three new health warnings, which were shown to be clearer, more impactful, and more memorable to both the public and people who gamble. Specifically, the messages recommended include “Gambling comes at a cost”, “Gambling can be addictive” and “Gambling can grip anyone”.
- The same research found the current approach of signposting to support services on gambling adverts is also failing. Specifically, when signposting to GambleAware on gambling adverts there is inconsistency, a lack of visibility (less than 5% attention for most gambling adverts), and a lack of information in support of the logo to show what advice, tools and support can be provided. As such, GambleAware has recommended locating the GambleAware logo in the top left corner of gambling adverts, within a safer gambling banner, alongside the message advice, tools and support.

5) The over-reliance on self-regulatory mechanisms has proven ineffective at ensuring best practice (e.g., issues with the Industry Group for Responsible Gambling (IGRG) code of socially responsible advertising, or the much-delayed cross-sport sponsorship code):

- Voluntary agreements, such as the whistle-to-whistle ban, have been found to be tokenistic, with the adverts covered within this ban only making up around 2% of gambling references in football⁷⁰. There is also evidence of increased advertising in the unrestricted period due to the partial nature of the ban⁷¹. In just one Premier League weekend there was found to be almost 7,000 gambling messages observed during the

⁶⁵ Industry Group for Responsible Gambling

<https://bettingandgamingcouncil.com/members/igrig>

⁶⁶ Consistent gambling messaging – Interactive wagering services. <https://www.cbs.sa.gov.au/documents/GAG-abo-consistent-messaging.pdf>

⁶⁷ An Experimental Study to Examine Whether and How Flemish and Dutch Harm Prevention Messages on Gambling Advertising Affect Consumers’ Gambling-Related Beliefs and Intentions. <https://psycnet.apa.org/record/2024-05854-002>

⁶⁸ Executive summary: Improving safer gambling messaging on operator advertising

https://www.gambleaware.org/sites/default/files/2024-05/GambleAware%20-%20Improving%20safer%20gambling%20messaging%20on%20operator%20adverts%20-%20Executive%20summary_1.pdf

⁶⁹ GambleAware Safer Gambling Messaging and Signposting Guidelines

<https://www.gambleaware.org/sites/default/files/2024-06/GambleAware%20Safer%20Gambling%20Messaging%20and%20Signposting%20Guidelines%20May%202024.pdf>

⁷⁰ Examining the frequency and nature of gambling marketing in televised broadcasts of professional sporting events in the United Kingdom

<https://www.sciencedirect.com/science/article/pii/S0033350620300512>

⁷¹ How did the ‘whistle-to-whistle’ ban affect gambling advertising on TV? A live football matching study

<https://www.tandfonline.com/doi/full/10.1080/16066359.2024.2355183>

broadcast of 6 games⁷², with the attempts at self-regulation labelled by researchers as ‘completely failing’⁷³.

- Despite the Premier League commitment to ban front-of-shirt sponsorship by the end of the 2025/26 season⁷⁴, a significant amount of exposure in sport remains. Stadiums are covered in brand logos and present on shirt sleeves, with just 1 in 20 gambling and gambling-like logos subject to the ban on front-of-shirt sponsorship⁷⁵. More broadly, other football leagues (e.g., English Football League⁷⁶, Scottish Professional Football League⁷⁷) have already signed long-term deals with gambling sponsors showing that self-regulation is not fit for purpose.
- The latest (7th⁷⁸) edition of the IGRG Code for Socially Responsible Advertising has a number of issues. For example, the guide:
 - Has multiple links that do not work suggesting a lack of attention to the guide
 - Contains stigmatising language (e.g., “responsible gambling”⁷⁹, “vulnerable”)
 - Advocates safer gambling messages recommended by research published almost 20 years ago⁸⁰ and fails to take into account best practice internationally⁸¹.
 - Lacks transparency around the monitoring of spend on marketing overall and safer gambling messaging by operators to ensure operators are complying with a requirement to spend 20% on this.
 - Lacks transparency around the enforcements that have been made to date, and the outcomes of those enforcements.
 - Outlines issues with a lack of evidence in this area but fails to ask operators to publish evidence summarising the research that informed the development of the campaign, and evaluations that shows the impact of the campaign so others can learn and share best practice.

⁷² The Prevalence of Gambling Adverts during the Opening Weekend of the English Premier League 2023/2024.

<https://www.bristol.ac.uk/media-library/sites/business-school/documents/BRISTOL-UNI-GAMBLING-Report2023-2.pdf>

⁷³ Gambling advertising: How is it regulated? <https://researchbriefings.files.parliament.uk/documents/CBP-7428/CBP-7428.pdf>

⁷⁴ Premier League statement on gambling sponsorship. <https://www.premierleague.com/news/3147426>

⁷⁵ Gambling, cryptocurrency, and financial trading app marketing in English Premier League football: A frequency analysis of in-game logos <https://akjournals.com/view/journals/2006/12/4/article-p972.xml>

⁷⁶ Sky Bet signs five-year title partnership extension with EFL

<https://www.efl.com/news/2023/june/sky-bet-signs-five-year-title-partnership-extension-with-efl/>

⁷⁷ WILLIAM HILL AND SPFL AGREE LANDMARK TITLE SPONSORSHIP DEAL.

<https://spfl.co.uk/news/william-hill-and-spfl-agree-landmark-title-spons>

⁷⁸ Industry Group for Responsible Gambling

<https://bettingandgamingcouncil.com/members/igrig>

⁷⁹ Moving on from responsible gambling: a new discourse is needed to prevent and minimise harm from gambling

<https://www.sciencedirect.com/science/article/abs/pii/S0033350620300822>

⁸⁰ ‘Chances are you’re about to lose’: new independent Australian safer gambling messages tested in UK and USA bettor samples

<https://osf.io/preprints/psvaxiv/ejqdf>

⁸¹ Executive summary: Improving safer gambling messaging on operator advertising

https://www.gambleaware.org/sites/default/files/2024-05/GambleAware%20-%20Improving%20safer%20gambling%20messaging%20on%20operator%20adverts%20-%20Executive%20summary_1.pdf

6) There is sufficient established evidence on the link between marketing exposure and gambling harm to justify further restrictions. Stronger evidence is unlikely given methodological limitations in this domain. The evidence base in GB outstrips many other EU countries that have greater restrictions on marketing:

- Evidence has already shown a ‘dose–response’ effect; whereby greater advertising exposure increases participation in gambling which leads to a greater risk of harm⁸².
- Expert academics in this area have pointed out that the requirement for research to find an even stronger link than this is impractical due to methodological difficulties⁸³. Realistically, studies will only ever show “modest” effects because the impact of advertising cannot be isolated, and is just one influence on behaviours amongst a complex array of others (e.g., parents, peers, wider culture)⁸⁴.
- The proposed measures are also out of step with gambling marketing in other jurisdictions (e.g., Belgium⁸⁵) and marketing of other harmful products in Great Britain (e.g., High Fat Salt Sugar foods⁸⁶). Over the past 10 years, 496 published research papers about gambling marketing have been published in the UK, which is more than the combined number of similar ones in Belgium, the Netherlands, Italy, and Spain (all of which have gone further than the UK in this area)⁸⁷.

2.2 Policy recommendations (appendix)

1) A pre-watershed ban on all broadcast gambling advertising (TV/Video On Demand/Radio) including broadcast sponsorships. Why?

Rationale: We recommend this for the following reasons:

- TV is the highest channel for awareness among CYP in the Gambling Commission survey, with 47% of those aged 11-17 recalling seeing a gambling advert on TV (47%)⁸⁸

⁸² What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature <https://www.sciencedirect.com/science/article/pii/S0033350622003420>

⁸³ ‘No evidence of harm’ implies no evidence of safety: Framing the lack of causal evidence in gambling advertising research <https://onlinelibrary.wiley.com/doi/10.1111/add.16369>

⁸⁴ Does TV advertising make children fat? : what the evidence tells us. <https://eprints.lse.ac.uk/1026/1/DOESTVMMASTER.pdf>

⁸⁵ Gambling Act review: how EU countries are tightening restrictions on ads and why the UK should too <https://theconversation.com/gambling-act-review-how-eu-countries-are-tightening-restrictions-on-ads-and-why-the-uk-should-too-199354>

⁸⁶ Introducing further advertising restrictions on TV and online for products high in fat, salt or sugar: consultation on secondary legislation <https://www.gov.uk/government/consultations/introducing-further-advertising-restrictions-on-tv-and-online-for-products-high-in-fat-salt-or-sugar-secondary-legislation/introducing-further-advertising-restrictions-on-tv-and-online-for-products-high-in-fat-salt-or-sugar-consultation-on-secondary-legislation>

⁸⁷ Case study analysis of “tipping points” in marketing regulation. Not currently publicly available (to be published later in 2024)

⁸⁸ Young People and Gambling 2023 <https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-2023/ypg-2023-attitudes-towards-and-exposure-to-gambling-exposure-to-gambling>

- Broadcasters cannot target adverts away from CYP as they have less specific targeting information at their disposal⁸⁹
- Untargeted adverts also exacerbate harm among those experiencing ‘problem gambling’ (who are more likely to be influenced by advertising) as they cannot opt-out of these types of adverts
- Other jurisdictions have used a watershed ban on broadcast as one of the first mechanisms to more effectively regulate marketing⁹⁰
- There is a high level of public support for action in this area, with 72% of adults in GB agreeing that advertising about gambling should be banned during the watershed⁹¹
- There is a high level of exposure around sports broadcasts in particular, in just one Premier League weekend there was found to be almost 7,000 gambling messages observed during the broadcast of 6 games⁹², with the attempts at self-regulation labelled by researchers as ‘completely failing’⁹³.
- Voluntary agreements, such as the whistle-to-whistle ban, have been found to be tokenistic, with the adverts covered within this ban only making up around 2% of gambling references in football⁹⁴. There is also evidence of increased advertising in the unrestricted period due to the partial nature of the ban⁹⁵.
-

Wider detail: As there are no wider restrictions on broadcast advertising within the UK Code of Broadcast Advertising (BCAP⁹⁸) and Gambling Commission Licence Conditions and Codes of Practice (LCCP⁹⁹), gambling products are advertised at all times of day. Although there is some self-regulation in place through the industry-led IGRG code¹⁰⁰, which bans some gambling adverts on TV during the pre-watershed period (i.e., between 5:30am and 9.00pm), it needs to be replaced with legislation to include a wider array of gambling types (e.g., bingo, lottery) and

⁸⁹ Minister Weerwind bans untargeted advertising for online games of chance

<https://www.government.nl/latest/news/2023/04/19/minister-weerwind-bans-untargeted-advertising-for-online-games-of-chance>

⁹⁰ Information for the Public

<https://www.gov.ie/en/organisation-information/2ceb2-information-for-the-public/#advertising>

⁹¹ Ipsos research explores barriers to opening up about experiencing problems with gambling

<https://www.ipsos.com/en-uk/ipsos-research-explores-barriers-opening-about-experiencing-problems-gambling>

⁹² The Prevalence of Gambling Adverts during the Opening Weekend of the English Premier League 2023/2024.

<https://www.bristol.ac.uk/media-library/sites/business-school/documents/BRISTOL-UNI-GAMBLING-Report2023-2.pdf>

⁹³ Gambling advertising: How is it regulated? <https://researchbriefings.files.parliament.uk/documents/CBP-7428/CBP-7428.pdf>

⁹⁴ Examining the frequency and nature of gambling marketing in televised broadcasts of professional sporting events in the United Kingdom

<https://www.sciencedirect.com/science/article/pii/S0033350620300512>

⁹⁵ How did the ‘whistle-to-whistle’ ban affect gambling advertising on TV? A live football matching study

<https://www.tandfonline.com/doi/full/10.1080/16066359.2024.2355183>

⁹⁸ The BCAP Code. 17 Gambling.

<https://www.asa.org.uk/static/699c12ab-3a81-4175-9a22f8b900997394/ea5ddf1f-fc39-4d6d-b0f9ae288d23c139/The-BCAP-Code-Gambling.pdf>

⁹⁹ 5.1.6 - Compliance with advertising codes

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/condition/5-1-6-compliance-with-advertising-codes>

¹⁰⁰ Industry Group for Responsible Gambling

<https://bettingandgamingcouncil.com/members/igr>

advertising types (e.g., sponsorships of TV channels). This could also be extended to follow movements in Germany to apply a ban on social media¹⁰¹.

2) All gambling marketing to include independent evidence-led health warnings with effective signposting to support. Why?

Rationale: We recommend this for the same reasons outlined in Section 4 above.

Wider detail: The Gambling Commission recommends that “all marketing of gambling products and services must be undertaken in a socially responsible manner”. As part of this, Licensees should follow any relevant industry code on advertising, notably the industry-led IGRG code for Socially Responsible Advertising. The IGRG code already asks operators to direct 20% of all eligible advertising (broadcast and digital) to safer gambling messaging but this needs to be monitored to ensure compliance and extended to a wider array of channels (e.g., sponsorship). We would suggest that operators abide by GambleAware’s newly published guidelines¹⁰², and where adverts cannot feasibly include safer gambling messaging (e.g., banner adverts, sponsorships) such adverts are banned. We would also ask the Safer Gambling Messaging Working Group, led by the Department of Health and Social Care (DHSC), to take on these recommendations in their ongoing work and to legislate their recommendations to ensure compliance.

3) A ban on gambling marketing at sports events (including removal of sponsorships from sports clothing, merchandise, and wider stadium). Why?

Rationale: We recommend this for the following reasons:

- The association of gambling and sport is particularly influential to CYP¹⁰³, for example by believing the gambling company is helping their team financially and seeing them in a positive light, and that gambling on sport is something a “typical fan” does to feel “part of the team”¹⁰⁴.
- Sports events are the fourth highest channel for awareness among CYP, with 35% of those aged 11-17 recalling seeing a gambling advert at a sports event¹⁰⁵

¹⁰¹ Gambling Act review: how EU countries are tightening restrictions on ads and why the UK should too

<https://theconversation.com/gambling-act-review-how-eu-countries-are-tightening-restrictions-on-ads-and-why-the-uk-should-too-199354>

¹⁰² GambleAware Safer Gambling Messaging and Signposting Guidelines

<https://www.gambleaware.org/sites/default/files/2024-06/GambleAware%20Safer%20Gambling%20Messaging%20and%20Signposting%20Guidelines%20May%202024.pdf>

¹⁰³ Parent and child perceptions of gambling promotions in Australian sport

<https://ro.uow.edu.au/cgi/viewcontent.cgi?article=2697&context=buspapers>

¹⁰⁴ Parent and child perceptions of gambling promotions in Australian sport

<https://ro.uow.edu.au/cgi/viewcontent.cgi?article=2697&context=buspapers>

¹⁰⁵ Young People and Gambling 2023

<https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-2023/ypg-2023-attitudes-towards-and-exposure-to-gambling-exposure-to-gambling>

- A minority of gambling logos will be removed if the only change made is front of kit sponsors. Most exposure within football comes from brand logos within the wider stadiums and other clothing (e.g., training kits, shirt sleeves). Approximately 1 in 20 gambling and gambling-like logos are subject to the voluntary ban on shirt-front gambling sponsorship¹⁰⁸.
- ¹⁰⁹Results from the Football Supporters Association Annual Survey for 2023¹¹⁰ show fans are in favour of more restrictions in this area, with 73% of football fans agree there are too many gambling advertisements / sponsorships in football and 66% even feeling that gambling sponsorship should be banned in football.

Wider detail: Although there has been a commitment from the Premier League to remove shirt sponsors from kits by the end of the 2025/26 season¹¹¹ this needs to be expanded to all sports clothing (e.g., shirt sleeves, training kits), wider purchased items (e.g., merchandise, match-day programmes) and other in-ground advertising for gambling brands (e.g., hoardings around pitches, digital screens). To date, we have seen minimal signs of progress from the Premier league who are producing a cross-sport gambling sponsorship code. There lacks any independent oversight of this code¹¹² meaning the Government should step in to legislate these changes and prevent further delays. Alongside these bans there should be a higher proportion of marketing spend within stadia attributed to independent safer gambling messaging as fans need to be more aware of the harms involved in gambling, as Parliamentarians have recently suggested¹¹³.

¹⁰⁸ Gambling, cryptocurrency, and financial trading app marketing in English Premier League football: A frequency analysis of in-game logos <https://akjournals.com/view/journals/2006/12/4/article-p972.xml>

¹¹⁰ National Supporters Survey 2023. <https://thefsa.org.uk/news/national-supporters-survey-2023-more-stats/>

¹¹⁰ National Supporters Survey 2023. <https://thefsa.org.uk/news/national-supporters-survey-2023-more-stats/>

¹¹¹ Premier League statement on gambling sponsorship. <https://www.premierleague.com/news/3147426>

¹¹² Gambling regulation: Government Response to the Committee's Second Report <https://publications.parliament.uk/pa/cm5804/cmselect/cmcomeds/698/report.html>

¹¹³ Gambling advertising in sport

<https://commonslibrary.parliament.uk/research-briefings/cdp-2024-0051/#:~:text=The%20report%20noted%20the%20exposure,with%20more%20safer%20gambling%20messaging.>