

# **The Effect of Gambling Marketing and Advertising on Children, Young People and Vulnerable People**

**Report 1 presenting findings from desk based research (literature review;  
content analysis of gambling advertising and a frequency analysis of sports  
sponsorship)**

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## CHAPTER 1: BACKGROUND

In March 2018, GambleAware commissioned a consortium of two independent research groups (the Institute for Social Marketing (ISM), working in partnership with ScotCen, Professor Gerda Reith and Dr Philip Newall) and Ipsos Mori, working in partnership with the University of Bristol and DEMOS) to assess the extent, nature and impact of gambling marketing on children, young people and vulnerable groups in the UK.

The research produced by the ISM and collaborators part of the consortia are divided into two reports. This first report focuses on the nature and content of gambling marketing and advertising in the UK and how it may reach and influence children, young people, and vulnerable groups. Findings are presented from three work packages: a literature review, a content analysis of gambling advertising in paid for media, and an analysis of gambling references broadcasts of professional sport in the UK. The second report (due Autumn 2019) will explore awareness of, and participation with, gambling marketing and what association (if any) this has with gambling-related knowledge, attitudes, and behaviour. This will be achieved through qualitative focus groups and interviews with young people and vulnerable groups, and an online cross-sectional survey with young people aged 12-25 years old.

The remainder of this chapter outlines the study rationale, along with the research aim and objectives and a summary of the research design. Chapters 2 to 4 present further methodological detail and the detailed results from each workpackage. Chapter 5 provides a summary of the key findings, highlights potential policy implications, future research priorities, and notes the strengths and limitations of the three work packages presented.

### 1.1 Study Rationale

Marketing is fundamentally important to gambling companies. It represents the primary method of communicating with new and existing consumers, can directly encourage gambling behaviour (i.e. sales), and can raise the profile of a brand over competitors in an increasing condensed and competitive market. Contemporary gambling marketing activities are based upon a multi-layered marketing mix. Strategies include mass media advertising (e.g. television), consumer marketing (e.g. price offers), and other forms of marketing communications (e.g. sponsorship)<sup>1,2</sup>. Mobile devices and social media enable gamblers to be sent personalised gambling adverts at any time. In-play betting allows betting throughout a sporting event, with gamblers given a limited time-frame to place a bet. TV adverts promoting in-play gambling during high-profile football games advertise predominantly high-loss complex gambles, which football fans overestimate the probability of winning<sup>3,4</sup>.

Recent increases in the volume of gambling marketing and advertising, combined with advances in technology, have exacerbated concerns about the effect of gambling marketing and advertising in the UK. Despite advertising codes of conduct that exist to control the content and placement of gambling advertising, there are concerns that these have not kept pace with developments in media and gambling marketing practices in recent years. This has resulted in a lack of understanding regarding the effect of gambling marketing and advertising on all consumers, and particularly children, young people, and vulnerable people.

The introduction of the Gambling Act (2005) in September 2007 allowed gambling to be advertised across all media (e.g. paid-for broadcast, billboard, and print advertising), resulting in a dramatic expansion of gambling advertising. For example, a 2013 Ofcom report found that television advertisements for gambling had increased from 234,000 per year in 2007 to 1.39 million in 2012, with adults viewing approximately 630 adverts per year and under-16s estimated to see 211 adverts<sup>5</sup>. Recent analysis suggests that spending on television

advertising for betting and gaming in the UK increased from £155m in 2014 to £234m in 2017, and that the total advertising and marketing spend for the online betting, casino games, bingo and poker sector has increased by 17% since 2014, reaching £1,473m in 2017<sup>6</sup>. Although the content is intended for those above the legal minimum ages for gambling, the ubiquity of gambling advertising and marketing means that children and young people are also exposed, despite codes of conduct stating that gambling advertising should be socially responsible and not appeal directly to them<sup>7</sup>. For example, in 2018, 66% of 11-16 year olds were reported to have seen gambling advertising on TV and 59% had seen gambling advertising on social media<sup>8</sup>. In 2017, the gambling industry is reported to have spent £149m on social media advertising and marketing (e.g. via Facebook content and commercial Twitter feeds), an increase in spend of 53% since 2014<sup>6</sup>.

These changes indicate that the marketing and advertising environment for gambling is completely different from that of the previous decade. A range of impacts relating to the experience of gambling problems have been theorised, but there has been little examination of the environments which contribute to gambling problems, particularly the role of marketing<sup>9</sup>. For the first time, young people in the UK are growing up in a landscape where gambling marketing is widespread. Binde's (2014) critical review concluded that there was very little empirical evidence assessing the impacts of gambling advertising<sup>10</sup>. His review also highlighted five priority areas for future research and key principles to be considered when conducting research into gambling advertising. This research study is situated within these principles and responds to the priority research areas. It is the first research study to be conducted in this area and contributes to an increasingly urgent evidence and policy gap.

## 1.2 Research Aim, Objectives, Questions

As specified in the original research brief the overall aim of this research was to understand the content, reach and effect of gambling marketing and advertising on children, young people and vulnerable people. This was expanded through three research objectives (RO):

- RO1: Explore whether gambling marketing and advertising influences children and young people's attitudes towards gambling, in what ways and the impact of this.
- RO2: Examine the tone and content of gambling marketing and advertising across all media, including social media affiliates, and explore the potential impact of this on children, young people, and vulnerable people.
- RO3: Identify specific themes and features of gambling advertising that children, young people and vulnerable groups are particularly susceptible to.

These ROs were further defined through the following eight research questions (RQ), grouped below under three headings:

### **Format and content:**

- RQ1) Focusing on marketing and advertising across all media, where and how often does gambling advertising occur?
- RQ2) What are the main themes and features used to market and advertise gambling products?
- RQ3) What are the specific themes or features of gambling marketing and advertising which children, young people and vulnerable groups are particularly susceptible to?

**Advertising impacts:**

- RQ4) To what extent are children, young people and vulnerable groups exposed to gambling marketing and advertising and what is the impact of this on attitudes, knowledge and gambling behaviour?
- RQ5) How does the impact of gambling advertising or marketing vary by different mediums?
- RQ6) How does the influence of marketing and advertising compare with other actors, such as parental gambling, parental facilitation, and moral or religious beliefs?

**Online advertising and social media:**

- RQ7) To what extent are children and young people exposed to online advertising in non-age restricted online environments, and on what channel or platform are they most likely to encounter gambling marketing and advertising?
- RQ8) To what extent does seeing an online advertisement, promotion or offer lead to people clicking through to an online gambling website to place a bet or spend money on gambling?

The three work packages reported in this report mainly contribute to RO2 and RO3, and to RQ1-3, (with the literature review looking more broadly at all RQs) and focus on: the placement of gambling marketing; the themes and features used; and whether the content may appeal to children, young people and vulnerable groups (see 1.3 below). Other work packages, to be reported separately, examine the views of experiences of children, young people and vulnerable groups themselves, using both qualitative and survey methods.

For this study vulnerable groups were defined in three ways:

- **Group 1 people living in constrained economic circumstances** - This group includes people who have cyclical money problems / short term; and who are on a low income / long term
- **Group 2 people with limited capacity to understand information** - This group includes people whose first language is English and have difficulties with comprehension due to mental ill health and /or learning disability.
- **Group 3 people already experiencing gambling problems** - This group includes medium risk gamblers.

**1.3 Research Design**

The work packages are:

1. Literature review: a review of current evidence, to provide context for the wider study
2. Content analysis: a detailed study of gambling advertising in traditional paid for media
3. Sports sponsorship: an analysis of gambling marketing references in televised and radio broadcasts of professional sport.

Further detail on research methods, sample and analytical approach for each work package are presented in the three results chapters that follow.

## CHAPTER 2: LITERATURE REVIEW

The first workpackage was a literature review, which had two main aims: (1) to review the existing evidence base to provide context to the research questions (shown in 1.2) above and; (2) to inform the research design for data collection. This chapter begins with detail on method (search strategy, data extraction and synthesis). It then presents results from the review and a summary of key findings.

### 2.1 Methods

#### 2.1.1 Search Strategy

Searches for peer-reviewed primary studies were run in April 2018 in the following four academic literature databases: (1) Business Source Complete (EBSCOHost); (2) Health Source (EBSCOHost); (3) Leisure Tourism Database (CABI); and (4) Web of Science Core Collection (Social Sciences, Arts & Humanities and Emerging Sources Citation Indexes).

Primary research could include secondary analysis of an existing dataset, but editorials, conference abstracts, opinion/theoretical pieces (i.e. with no primary data), literature/systematic reviews were excluded. However, reference lists for reviews were scanned for relevant articles, e.g. Valentine (2016), Binde (2014), Parke (2014)<sup>10-12</sup>. Search results were limited to English language only and papers had to be published since January 2013 (the rationale being that Binde's 2014<sup>10</sup> review of gambling advertising searched for articles up to October 2013). Any type of study design (e.g. quantitative, qualitative, experimental or mixed methods) and any population group were eligible for inclusion as long as they related to the research questions. Additional sources of studies that were drawn on included a detailed bibliography by Binde (2017)<sup>13</sup>, and suggestions shared by the wider project team.

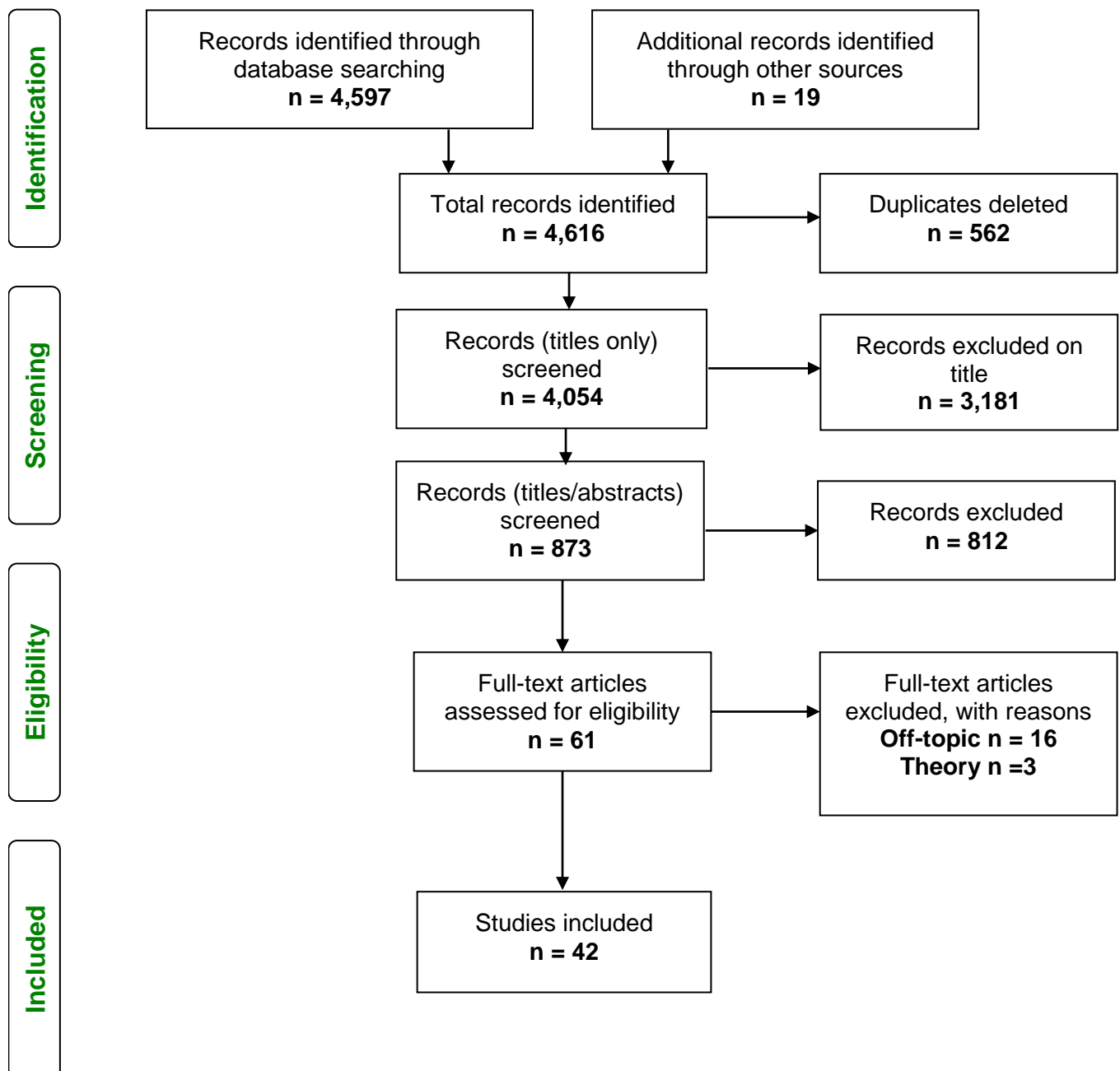
The search strategy combined terms for gambling (e.g. betting, bingo, bookmakers, casino, gambling, lottery, wager) with terms for advertising and marketing (e.g. advergaming, advert, branding, commercials, consumers, digital media, marketing, online, promotions, publicity, televised). Terms were truncated to include all forms of the 'root word', including plurals.

Relevant grey literature (non-peer reviewed) reports ( $n=10$ ) collected in the development stage of our project through ad hoc searches and recommendations by the wider research team were also included in our data extraction table. A further three papers were identified by the authors after the initial search was completed in April 2018<sup>14-16</sup>. These papers were included due to their relevance to the review. Results were uploaded to reference management software and de-duplicated. Search results are presented in Figure 2.1.

After an initial screening exercise, involving reading the record titles, records that were obviously irrelevant were removed. The remaining record titles ( $n=873$ ) and abstracts were screened by four reviewers (FD, PN, CM, AM). A set of records ( $n=61$ ) were retrieved as full texts for final assessment for inclusion by the reviewers. The final set of studies ( $n=42$ ) met the relevancy criteria and were included for full data extraction. We are aware that there is a considerable body of unpublished literature from Australia which was too large to include in this review. For this reason, we have prioritised grey literature from the UK and Australian reports that were most relevant to the review (e.g. Hing's recent work tracking the effect of advertising exposure on gambling expenditure (Hing et al., 2018)).



Figure 2.1: PRISMA



### 2.1.2 Data Extraction and Synthesis

A data extraction spreadsheet (summarising the study aim, sample, design, country of origin, and key findings of papers) was created to extract relevant data from papers included for full review. Findings were then organised to answer the eight research questions. As we did not want to unnecessarily restrict the review by defining 'vulnerable groups', we created a category called 'target group' and described the sample for each paper. From this we were then able to classify the type of people the study was targeting. As noted in Chapter 1 (paragraph 1.2) there were three vulnerable groups of interest: group 1, *people living in constrained economic circumstances*; group 2, *people with limited capacity to understand information* and group 3, *people already experiencing gambling problems*. We found several studies that focused on children, adolescents and problem gamblers<sup>17-24</sup> (the latter comprising group 3 in our definition

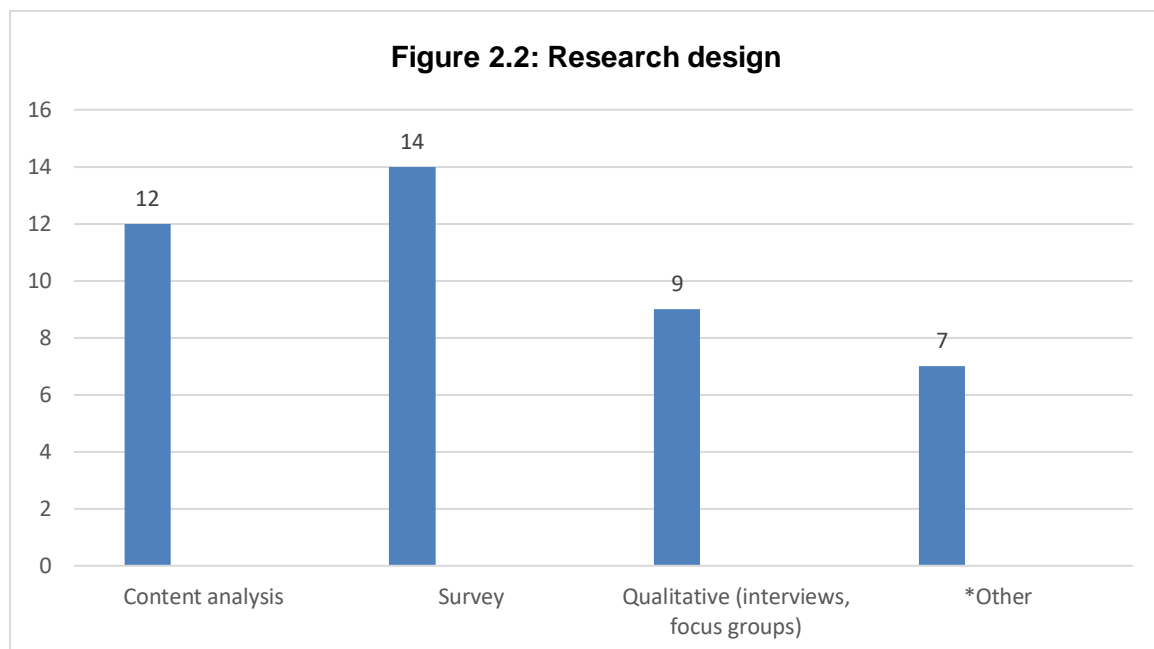
of vulnerable groups) but none that looked specifically at groups 1 or 2 (people living in economic constraint, or with limited capacity to understand information). Instead it was common for studies to focus on the type of gambling consumed, e.g. online gambling, sports betting<sup>24-29</sup>.

## 2.2 Results

For the remainder of this chapter, we present our synthesis of the literature across three overarching themes: gambling advertising content; gamblers' perceptions of advertising; and advertising's effects on behaviour. Each of the eight research questions for the study are grouped under the most appropriate theme. Before these themes are discussed we present a brief descriptive overview of the studies included in the review.

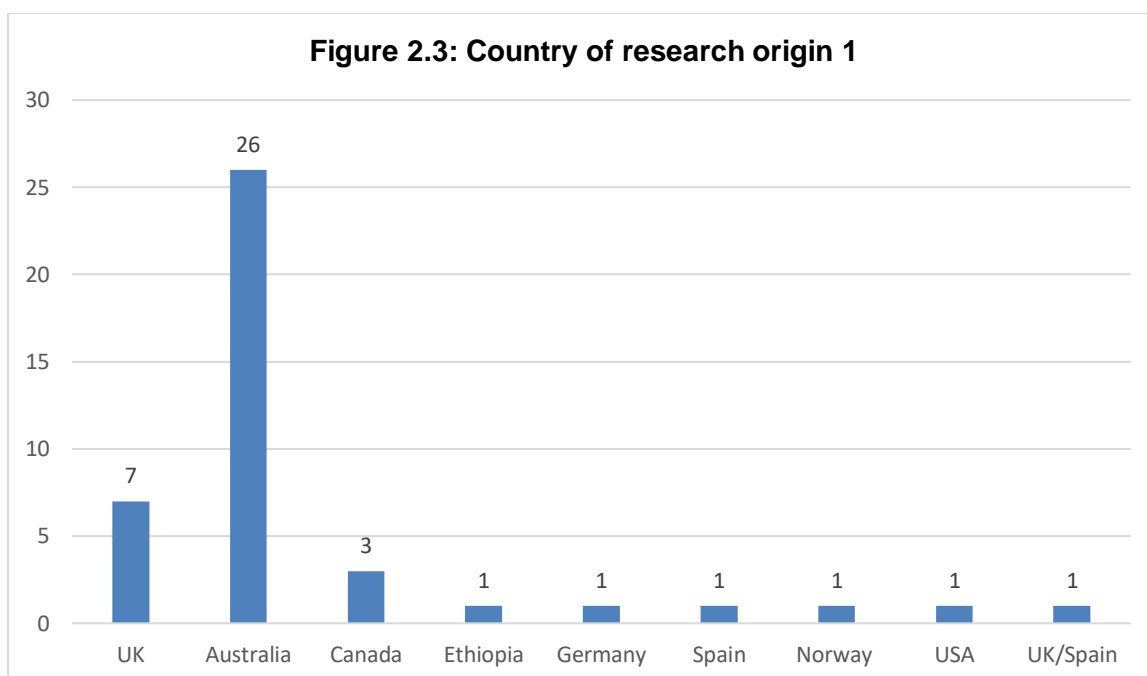
### 2.2.1 Descriptive Overview of Included Studies

Quantitative research designs (content analysis and surveys) accounted for two-fifths of papers (62%,  $n=26$ , Figure 2.2). Less than one-quarter of studies used qualitative methods (21%,  $n=9$ ).



\*(secondary data analysis  $n=1$ , mixed method  $n=4$ , laboratory based  $n=2$ )

Two-thirds (62%,  $n=26$ ) of papers included in the review were from Australia (Figure 2.3). There were seven papers from the UK, of which only three were published in a peer review journal.



## 2.2.2 Gambling Advertising Content

This theme is concerned with how gambling operators communicate with their target audience (i.e. what strategies are used and over what media platforms). Of particular interest are the ways gambling advertising can 'leak' into sport commentary and the different communication methods used (increasing brand awareness for example through football shirt sponsorship, financial incentives to gamble and odds advertising).

### 2.2.2.1 RQ1. Focusing on marketing and advertising across all media, where and how often does gambling advertising occur?

It can be difficult to establish exactly where and how often gambling advertising occurs. Principally, this is due to gambling advertising patterns changing over time and variation between countries. However, a recent analysis conducted by a UK newspaper found that 17% of all advertising shown around ITV's coverage of the 2018 FIFA World Cup was for gambling<sup>30</sup>. This content analysis, conducted by the Guardian, found that British viewers of the World Cup were shown almost 90 minutes of betting adverts during the tournament meaning that *"Bookmakers and online casino companies enjoyed one and a half times as much screen time as alcohol firms and almost four times that of fast food outlets."*<sup>1</sup>

Gambling advertising was, however, confined to the advertising breaks during the World Cup, as no pitch-side gambling advertising was allowed during the tournament, and no teams had gambling advertising shirt sponsors. Things are different in the English football Premier League, with team shirt sponsorship increasing in recent years<sup>1</sup>. For example, analysis of shirt sponsorship in the Premier League found four deals with gambling companies in 2008, by 2012 this had increased to six and then ten in 2017. This accounted for half of the 20 English Premier League teams<sup>1</sup>. In a similar vein, research found a pronounced increase in shirt sponsorship by gambling companies in the English Premier League, which they attributed

<sup>1</sup><https://www.theguardian.com/media/2018/jul/15/children-bombarded-with-betting-adverts-during-world-cup> [accessed 5.10.18]

to the liberalisation of advertising regulations since the implementation of the 2005 Gambling Act <sup>31</sup>.

The growth of pitch-side advertising and shirt sponsorship means that gambling advertising can also appear in sports coverage talk shows. Analysis conducted in the UK in 2017 <sup>32</sup> of three full Match of the Day episodes (broadcast from a non-commercial British channel, BBC1) found an average of over 250 gambling logo exposures per episode. This was more than the average number seen in full televised matches shown on a commercial broadcaster (Sky Sports).

Several studies suggest that a saturation of gambling advertising around sport is not unique to the UK. For example, an analysis of National Rugby League matches in Australia found an average of 110.7 gambling advertising episodes per match <sup>33</sup>. Unlike the UK, gambling advertising was not restricted to logos seen during play or commercial breaks, but was also embedded during the live commentary and during the half-time studio break, e.g. discussion of betting odds. This feature of Australian gambling advertising has been noted elsewhere <sup>24</sup> and is an example of a growing trend, where gambling advertising slowly seeps into other forms of media content.

#### **2.2.2.2 RQ2. What are the main themes and features used to market and advertise gambling products?**

The majority of gambling advertising can be placed in three categories: brand awareness, financial incentives, and odds advertising.

**Brand awareness** adverts are defined as any marketing message which serves to remind consumers of a gambling brand's existence, but without including any more substantive financial incentives, mentioning betting odds, or promoting specific product features. Brand awareness gambling advertising is a major feature of many sports <sup>1,2,31,33</sup>.

**Financial incentives** to gamble frequently appear in advertising, and can take many forms. A study from Australia found 15 distinct types, including sign-up bonuses, refer-a-friend bonuses, refunds, and risk-free bets. These incentives were accompanied by technical fine print <sup>34</sup>. For example, money was often given as "free bets," which would have to be gambled a specified number of times before it could be withdrawn from the account. Young people have reported sign up bonuses acting to encourage them to start gambling online <sup>25,35</sup>. A similar range of financial incentives have been observed in both the UK and Spain <sup>36</sup>.

The complexity of financial incentives in gambling advertising appears to be increasing. For example, financial incentives used to feature primarily on sign-up bonuses, but more recent techniques seem to focus on boosted odds and refunds (i.e. if a non-winning event occurs). Although the extent to which gamblers, and in particular vulnerable groups, are able to process the necessary information to make informed judgments around complex financial incentives is not known, it seems reasonable to assume that such bets could pose a particular risk to them. Another unanswered question is how effective financial incentive advertising is. We could find only one study using gambling industry data, showing that financial incentives in the form of large cash and non-monetary prizes (e.g., a car) led to increases in slot machine play at a US casino <sup>37</sup>.

**Odds advertising** features anecdotally in Australian research <sup>24,33</sup>, but the most rigorous studies on the types of events featuring in odds advertising have come from studies of UK soccer. Two features stand out from this research. Odds adverts tend to be for highly-specific combination bets, e.g., "Thomas Müller (football player) to score first and Germany to win 3–1," <sup>4</sup>. As a bet becomes more specific, the size of the potential win increases. However, the

chances of winning decrease even more. This means that the bookmaker makes a higher profit margin on complicated bets than traditional simple bets, such as “England to win”<sup>3,4</sup>. The second feature is that advertised bets tend to involve individually-intuitive events<sup>4</sup>. For example, Thomas Müller was the top goal scorer in the 2014 World Cup. Previous psychological research indicates that people are most likely to overestimate the likelihood of a very specific event happening precisely when it involves at least one individually-intuitive event<sup>38</sup>. This evidence suggests that UK soccer odds advertising is targeted to take advantage of gamblers’ decision making errors<sup>3,15</sup>. However, it is as yet unclear whether the same psychological factors occur in odds advertising elsewhere (e.g. other sporting events), or how vulnerable groups may be affected.

Another line of research looks at the specific themes or narratives used to promote gambling. Here converging evidence from different countries point toward some common themes. Gamblers are frequently shown as winning in Australia<sup>26</sup>, the UK, Spain<sup>1</sup>, and Canada<sup>39</sup>. Other thematic analyses argue that sports betting advertising makes gambling appear predictable and skilful<sup>1</sup>. A content analysis of 280 televised Australian gambling adverts found that bright colours and humour were common features<sup>40</sup>. The use of celebrity endorsements and characters with which children are familiar also serve to make these kinds of activities attractive to that group, as well as contributing to the normalisation of gambling as part of sport<sup>20,21</sup>.

### **2.2.2.3 RQ5. How does the impact of gambling advertising or marketing vary by different mediums?**

The literature explicitly comparing gambling advertising across different mediums is limited. One study, however, found that undergraduate students were more influenced by gambling companies’ advertising on Facebook, if one of their friends posted gambling-related content<sup>17</sup>.

Thomas et al (2015)<sup>41</sup> conducted a context analysis to explore the marketing strategies of seven Australian sport wagering companies (Crownbet.com.au, Ladbrokes.com.au, Sportsbet.com, Tab.com.au, TomWaterhouse.com.au, Unibet.com.au, WilliamHill.com.au) on three social media platforms (YouTube, Twitter, Facebook). They found that Facebook pages had the highest number of ‘likes’ across the three social media platforms. Daily tweets were also common - with one operator averaging 58 tweets per day (WilliamHill.com.au). Variation was noted across all three social media platforms in terms of marketing content (e.g. a combination of video, text, pictures, and links to other websites) but heterogeneity in terms of creative strategies used to promote the product - all three used humour, games, statistics and cartoons. Sports promotion was also common (across all three platforms) in a variety of forms: refunds, tipping, betting promotions, odds and prompts to bet. They also noted that YouTube videos used features that appealed to both children and adults, e.g. humour, sounds, animals, colours, celebrities and words and/or text<sup>41</sup>.

### **2.2.2.4 RQ7. To what extent are children and young people exposed to online advertising in non-age restricted online environments, and on what channel or platform are they most likely to encounter gambling marketing and advertising?**

While it is clear that children and young people are exposed to gambling advertising online, there is less clarity on how frequent this exposure is due to online advertising being targeted<sup>42</sup>. As gambling industry data on online advertising expenditure and targeting are not available to researchers, research has relied on self-reports<sup>43</sup>. Despite a limitation of self-report data being its reliance on individual recall, it still provides insight into exposure among young people. One qualitative study of young people in Canada found that social casino games were

an entry point to online gambling, and that advertising in these games served as an entry point to other forms of online gambling<sup>35</sup>. Australian youth have also been found to be exposed to this type of gambling advertising<sup>18</sup>.

### 2.2.3 Perceptions of Gambling Advertising

This theme broadly looks at public perceptions of gambling marketing, i.e. what aspects of gambling marketing are children, young people and problem gamblers susceptible to?

#### 2.2.3.1 RQ3. *What are the specific themes or features of gambling marketing and advertising which children, young people and vulnerable groups are particularly susceptible to?*

Research relevant to this question is based on self-report data, with the majority of the work to date from Australia. When it comes to social casino games, young people seem especially attracted to adverts using bright or contrasting colours, and featuring animated characters<sup>18</sup>. Similar findings were found in a mixed method study (content analysis of five sport betting website and 10 focus groups with young adults) conducted in Australia<sup>28</sup> which found sports betting brands that used humour or incentives were particularly appealing. They also found high levels of awareness and engagement with sports betting brands which formed part of young people's regular social activity, e.g. socialising with friends to watch a big sporting event which included placing a bet using a sport betting app. The authors noted that this type of sport betting was part of "*regular and normalised socialising and consumption practices in their lives*" (Gordon & Chapman, 2014, p31)<sup>28</sup>.

Young people appear particularly susceptible to financial incentives<sup>25,35</sup>. Some children incorrectly thought that these financial incentives meant gamblers could never lose<sup>19</sup>. Moreover, some children misunderstood odds advertising, seeing these messages as merely providing relevant information, while misunderstanding the persuasive aspect of these adverts<sup>20</sup>. Additionally, children appeared to be attracted to the skill element of sports betting, and to bets with high odds<sup>19</sup>. Three quarters (75%) of Australian children reported that they saw gambling advertising as a normal part of sport, and could freely recall examples of financial incentives and odds advertising<sup>20</sup>.

Research on Australian problem gamblers raises a number of related perceptions around gambling advertising. Problem gamblers expressed concerns about free bets or risk-free gambles, especially when these adverts were targeted via mobile phone push notifications or via email when the gambler was trying to reduce gambling frequency<sup>44</sup>. Gambling advertising around sport appeared to influence problem gamblers more than casual sports bettors<sup>24,29</sup>. One study also reported that young men felt social pressure to gamble on sports<sup>29</sup>, which corresponds to findings of increased social risk taking in adolescence<sup>45</sup>. It has also been reported that problem gamblers approve more of gambling advertising than non-problem gamblers<sup>46</sup>. Problem gamblers also reported being attracted to in-play betting inducements, which allow gamblers to make high-frequency bets throughout a sporting event<sup>46,47</sup>. A Swedish study also reported that problem gamblers were overrepresented in the group of respondents who self-reported that gambling advertising had a negative effect on them<sup>14</sup>.

### **2.2.3.2 RQ6. How does the influence of marketing and advertising compare with other factors, such as parental gambling, parental facilitation, and moral or religious beliefs?**

We did not find any literature within our search criteria that added anything to this research question.

## **2.2.4 Effects of Marketing on Gambling Behaviour**

Of the three themes, finding literature exploring the effect of gambling marketing on gambling behaviour was limited, reflecting the inherent difficulty in measuring this. Of the literature included data were collected using cross sectional surveys, which can explore the association between marketing and gambling behaviour but not allow for causality (this would require longitudinal cohort studies, of which we found none).

### **2.2.4.1 RQ4. To what extent are children, young people and vulnerable groups exposed to gambling marketing and advertising and what is the impact of this on attitudes, knowledge and gambling behaviour?**

It can be especially hard to examine the influence of gambling advertising exposure on behaviour especially in relation to young people, given that much of this gambling will be informal and/ or illegal. However, a study from Germany found that recall of gambling adverts amongst 13-25 year olds was positively associated with gambling frequency<sup>22</sup>. After controlling for other variables, those with the greatest advertising exposure were 2.3 times more likely to be lifetime pathological gamblers. Similar findings come from a Norwegian study showing that problem gamblers (a vulnerable group) were more likely to be aware of gambling advertising, and to report that it increased their involvement in gambling<sup>23</sup>. Finally, an Ethiopian study, reported that gambling advertising may also contribute to problem gambling amongst adolescents<sup>48</sup>.

We found two unpublished studies that looked at exposure in the UK context<sup>49</sup>. The first was a qualitative study commissioned by the Advertising Standards Agency (ASA, 2014) to explore public perceptions of gambling advertising in the UK, with a specific focus on children's exposure<sup>49</sup>. The findings suggested that participants did not particularly view children's exposure to sports betting or bingo advertising as likely to cause harm, although they did agree that certain type of adverts would appeal more to children than others (e.g. Foxy bingo due to it featuring musical and animal characters). However, this was a small study (six focus groups with the general public and five interviews with regular gamblers) and as found in other studies there was a belief that free bet offers were most likely to appeal to younger people<sup>17,19,20,25,35</sup>. The ASA study also found that exposure to gambling advertising (captured by diary completion before focus group discussion) was particularly high for young men aged between 18 and 26 years.

The second study was conducted by Demos (2017)<sup>50</sup> to develop, pilot and evaluate a school based intervention to prevent gambling related harms. Qualitative preliminary work was conducted to inform the intervention. Results from two focus groups with high school students (n=19) suggested two sources of information about gambling which were advertising related - TV (watching sports) and social media (e.g. Facebook). Students also conducted a baseline activity to assess gambling knowledge and were asked to list words they associated with gambling. Despite most ranking their knowledge as low, the authors noted that '*a small number included 'advertising' and named specific gambling companies.'* This suggests both exposure and awareness of gambling advertising.' (DEMOS, 2018, p54).

The remainder of studies on this research question come from Australia. Many children aged 5-12 were able to pair gambling shirt sponsors with sports in a laboratory-based memory experiment<sup>51</sup>. A study of social media marketing claimed that age restrictions were effectively impossible to enforce<sup>52</sup>. Australian problem gamblers, like those in Germany and Norway, also appear to be exposed to more gambling adverts than non-problem gamblers, although these effects again may plausibly be due to recall biases<sup>27</sup>. Similar effects were found amongst Australian adolescents<sup>53</sup>. Australian rugby league fans reported being influenced by odds advertising, *“and when I see a long shot I get a little excited, so out comes my phone”*<sup>47</sup>.

One recent study attempted to overcome weaknesses inherent in previous studies analysing gambling advertising’s effects on behaviour (Hing et al., 2018). In this study, participants’ betting behaviour and advertising exposure was tracked five times a week for a total duration of three weeks. Advertising exposure was on average high, and led to increased gambling expenditure for all groups of gamblers. An experimental study by the same authors found that financial incentives led to sports bettors taking on riskier bets, and yet perceiving that these bets were lower-risk. Furthermore, all gamblers on average underestimated the play-through requirements for these experimental financial incentives (gambling companies require a certain number of gambles to be made before financial incentives can be withdrawn). This set of studies provides some of the most convincing evidence yet on gambling advertising’s negative effects on gamblers’ behaviour (Hing et al., 2018). A follow-up to this study on messages sent direct to gambling account holder’s mobile phones found that these “push notifications” similarly prompted sports bettors to place larger and riskier bets (Hing, Russell, & Rawat, 2018).

#### **2.2.4.2 RQ8. To what extent does seeing an online advertisement, promotion or offer lead to people clicking through to an online gambling website to place a bet or spend money on gambling?**

Our search strategy yielded one lab-based study using behavioural data<sup>17</sup>. Over half (58%) of the sample of young males reported seeing a paid-for gambling advert on Facebook in the previous year. They reported being more influenced to gamble by gambling-operator based Facebook groups, rather than by material about gambling posted by one of their peers. The only data based on real world advertising is based on self-reports<sup>54</sup>, and is hence subject to a potential perception/recall bias. In this study problem gamblers reported seeing more gambling adverts on social media than non-problem gamblers, and were more likely to say that these adverts increased their desire to gamble.

## **2.3 Summary of Key Findings**

The primary purpose of this review was to add context to the research questions set out in Chapter 1. This was an ambitious undertaking and it was clear from the outset that existing evidence contributed more to some research questions than others. We also identified caveats that may influence the transferability of findings to a UK context.

The review highlighted the lack of studies in the UK exploring the effect of gambling marketing on children, young people, and vulnerable groups. Out of the 42 included papers, just seven were conducted in the UK and four of these were unpublished. The growing acceptance of gambling as a public health issue in the UK<sup>55</sup> and the Responsible Gambling Strategy Board’s research plan for the forthcoming years may help to address the evidence gap in the UK, but this is dependent on research funding and building research capacity in the field.



A key finding is that gambling marketing is entwined with sport in a variety of ways. This is visible in traditional marketing approaches, i.e. screening adverts before, during and after sporting events, like the recent 2018 FIFA World Cup. However, there are also more subtle forms of marketing which include attempts to boost brand awareness, such as pitch side advertising and shirt sponsorship, with the latter more than doubling in the UK in the last 10 years<sup>1</sup>. Studies from Australia have also highlighted a growing trend where discussion of betting odds has become part of the commentary in some sport talk shows. Although we found no empirical studies of this phenomenon in the UK, embedded gambling advertising features in many UK newspapers, and during live radio coverage of UK sport. Further monitoring of this in the UK is, therefore, required.

Australian research of gambling culture points to gambling being an integrated part of social activity (e.g. using smartphones to place a bet with friends when watching a rugby match) which is increasingly seen as normal behaviour. This is potentially concerning, especially as the review highlighted the growing use of incentives to gamble and complex betting odds; the more complex the odds the higher the pay-out, but the lower the chance of winning. The review also highlighted that young people and problem gamblers are particularly susceptible to incentives and odds betting, although in different ways. Young people do not appear to fully appreciate how incentives and betting odds work and the complexity involved in them, whereas problem gamblers can feel targeted with tailored incentives to encourage them to gamble more or restart gambling if they have self-excluded. In the UK, the complexity of financial incentives in gambling advertising appears to be increasing.

The review identified a fairly established international literature on how gambling advertising affects attitudes amongst vulnerable groups, with the notable exception of research from the UK. The definition of vulnerable groups was confined to young people and problem gamblers as they were the key groups of interest for this review. However, research that included other priority vulnerable groups (e.g. people living in constrained economic circumstances or with limited capacity to understand information) was poorly represented in the literature, highlighting a research gap.

With respect to methodology, there was a dearth of qualitative research (accounting for less than one-quarter of the studies included), which could add greater depth and understanding to survey findings and content analysis. Also lacking were longitudinal cohort studies to track the influence of gambling marketing on gambling behaviour over time. Finally, studies that explored the uses of technology as a gambling marketing tool were also absent, although this is likely a reflection of the fast pace of change and growth in this market, of which research lags behind.

## CHAPTER 3: AN IN-DEPTH CONTENT ANALYSIS OF PAID-FOR GAMBLING ADVERTISING IN THE UNITED KINGDOM

### 3.1 Introduction

Previous content analyses of gambling advertising have mostly focused on individual media channels such as television. There is a dearth of research exploring how advertising techniques apply across different media and gambling formats, and some examples of gambling advertising in the UK, such as direct mail and e-mail advertising, have received little or no research coverage. This chapter presents findings from our second workpackage, an in-depth content analysis of 'paid-for' gambling advertising from eight media channels in the UK. The chapter begins by detailing the content analysis methodology, including the study design, advertising sample, codebook, and the analysis approach (3.2). In the results we review the characteristics of gambling advertising, the design features and content used to create appeal, evidence of consumer information and messaging (e.g. age restriction warnings and consumer protection messages), information suggested about the gamble and associated offers, and messages suggested about gambling behaviour and outcomes (3.3). The chapter concludes with a summary of the main findings, implications for policy, and the strengths and limitations (3.4).

### 3.2 Methods

#### 3.2.1 Design

We conducted an in-depth mixed-method content analysis of paid-for gambling advertising from eight media channels in the UK. A quantitative codebook was developed to capture the design and content features used to create appeal, information about the gamble and associated offers, and messages suggested about gambling behaviour and outcomes. The design and content features were also examined qualitatively to provide illustrative insight into each codebook item.

#### 3.2.2 Sample of Gambling Advertising

Gambling advertising from the UK ( $n = 300$ ) was sampled across eight media channels: (1) print press (e.g. newspapers); (2) internet (e.g. website banners); (3) television; (4) radio; (5) e-mail; (6) direct mail (e.g. letters to a named individual); (7) door drops (e.g. delivered to the home, but with no named addressee); and (8) outdoor advertising (e.g. billboards)<sup>2</sup>. Data were only sampled from conventional (i.e. 'paid for') media channels. Social media marketing, such as Facebook and Twitter, were covered by a concurrent project commissioned by the funder and were, therefore, not included. Copies of the adverts to be analysed (also known as creatives), together with information on placement, duration, size and format, were supplied by media monitoring company Ebiquity (who collect advertising spend data and examples of advertising).

Advertising creatives for press, internet, television, radio, and e-mail were sampled from a two-week period in 2018 (5<sup>th</sup> - 11<sup>th</sup> March and 12<sup>th</sup> - 18<sup>th</sup> March). These weeks were selected using gambling advertising expenditure data across six months (30<sup>th</sup> October 2017 – 30<sup>th</sup> April 2018), and were chosen to reflect a week with a high intensity of gambling advertising (i.e. the highest weekly expenditure in those six months) and an adjacent week which reflected

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<sup>2</sup> Examples of marketing from each media channel are reported throughout the results.

average expenditure over the six months. For direct mail, door drops, and outdoor advertising, creatives were sampled across March 2018 as data were only available at a monthly level (not weekly). One-hundred-and-fifty creatives were randomly selected from each week, from a maximum of 370 in week one and 666 in week two ( $n = 1,036$ ). Within each week, the random sample was stratified to be representative by advertising channel (Table 3.1).

**Table 3.1: Sample of gambling advertising creatives**

	Week One (5 <sup>th</sup> – 11 <sup>th</sup> March 2018) <sup>1</sup>			Week Two (12 <sup>th</sup> – 18 <sup>th</sup> March 2018) <sup>1</sup>			Total
	<i>n</i>	% in week	<i>n</i> selected <sup>2</sup>	<i>n</i>	% in week	<i>n</i> selected <sup>2</sup>	
<b>Print press</b>	270	73	108	518	78	116	224
<b>Internet</b>	36	10	15	54	8	12	27
<b>TV</b>	32	9	13	39	6	9	22
<b>Radio</b>	13	4	6	21	3	5	11
<b>Email/Media</b>	7	2	3	23	3	5	8
<b>Direct Mail<sup>3</sup></b>	5	1	2	5	1	1	3
<b>Door drops<sup>3</sup></b>	6	2	2	5	1	1	3
<b>Outdoor<sup>3</sup></b>	1	0	1 <sup>4</sup>	1	0	1 <sup>4</sup>	2
<b>Total</b>	370	100	150	666	100	150	300

Notes:

<sup>1</sup> Week Two was chosen as the week with a high intensity of gambling marketing activity (i.e. the week with the highest weekly expenditure 30<sup>th</sup> October – 30<sup>th</sup> April 2018). Week one was chosen as the adjacent week which reflected average marketing expenditure over the six months.

<sup>2</sup> The number of marketing creatives selected from each week was determined by calculating the weekly proportion of each channel as a function of 150 creatives (i.e. 73% of press adverts in week one translated into 108/150 in the sample).

<sup>3</sup> The number of creatives for these channels was only available at a monthly level. Because there was only a small number of creatives in March 2018, for stratification purposes the monthly total was divided across the two weeks.

<sup>4</sup> This number rounded to zero. To ensure at least one creative from each channel was included, it was purposefully rounded up, and one creative was removed from the media channel with highest level of representation (press).

### 3.2.3 Content Measures

A quantitative codebook was developed based on previous content analyses of marketing for other fast-moving consumer goods – such as alcohol – and by reviewing creatives from each of the gambling advertising channels sampled in this study. The codebook was divided into six sections: (1) characteristics of the advertising; (2) design and content features; (3) content and messages in detail; (4) consumer information and messages; (5) information presented about the gamble and associated offers; and (6) messages suggested about gambling behaviour and outcomes.

#### 3.2.3.1 Characteristics of the advertising

For all advertising creatives, section one of the codebook recorded the day of the week that the advert first appeared (i.e. not all the dates on which it was repeated). For print press adverts, the codebook recorded the size and type of advert (e.g. advert, promotion, or advertorial). For television and radio adverts, the codebook recorded the length of the advert (in seconds). For internet, the codebook coded the website(s) where the advert appeared.

#### 3.2.3.2 Design and content features

Section two of the codebook contained 15 items to capture key design and content features of the advert (Table 3.2). This included information about the brand and type of gambling promoted, features used to identify and promote the brand (e.g. logos, slogans, 'big brand claims', and links to other marketing), the ages and genders of any individuals depicted, what contexts were featured, and attempts to engage consumers (e.g. signposts to play, calls to action, or personalised content). All items were coded using categorical response options (e.g. Yes/No/Not sure). For each item, a free text box captured additional illustrative detail.

**Table 3.2: Codebook section two: Content and design features**

<b>Design features</b>	<b>Definition</b>	<b>Summary of codes</b>
Brand	What gambling company and/or brand produced the marketing?	Pre-populated list of brands, including option for multiple brands.
Type of gambling	What form of gambling is promoted in the marketing?	Bookmakers (e.g. sports betting); Gaming; Lotteries; Bingo; Casino or card games; Pools; Other; Multiple; Not known; Not Applicable (i.e. if only promoting brand)
Brand logo	Is the brand logo or name featured in the marketing?	Yes; No; Not sure
Brand slogan	Is a brand slogan or tagline included in the marketing?	Yes; No; Not sure
Big brand claim	Does the marketing include a 'big-brand-claim' (e.g. Best odds in English football)	Yes; No; Not sure
Brand stretching	Does the marketing reference to a related arm of the same brand (e.g. a sports betting brand promoting their online casino).	Yes; No; Not sure
Links to other marketing	Does the marketing include reference to another form of marketing from the same brand (e.g. television or print press linking to websites, social media, or apps)	Yes; No; Not sure
Context	Is the marketing situation within an obvious or clear location or context (e.g. a football stadium or horse racing track)?	Yes; No; Not sure
Ages featured	What is the age of any characters or actors featured in the marketing?	16-24 years old; 25-34 years old; 35-44 years old; 45-54 years old; 55-64 years old; 65 years or older; Mixture of ages; Not sure; Not applicable.
Genders featured	What is the gender of any characters or actors featured in the marketing?	Predominately males; Predominately females; Even mixture of males and females; Not sure; Not applicable.
Signpost to play	Does the marketing reference how the audience can take part in the gamble (e.g. smartphone application, online, in shop)?	Yes; No; Not sure
Call to action and fostering responses	Does that marketing have a call to action for the audience, command them to carry out an action, or ask them to participate, or attempts to foster a response (e.g. Download the app now)?	Yes; No; Not sure
Personalisation	Does the marketing make attempts to personalise the content (e.g. place YOUR bet now) or by including the names of actual consumers?	Yes; No; Not sure
Competition	Does the marketing reference to a competition beyond any gamble promoted (e.g. win tickets to a football match)?	Yes; No; Not sure
Music	Does the marketing use music? <sup>1</sup>	Yes; No; Not sure; Not applicable

<sup>1</sup> Television and Radio only;

For all items, a free text item was included to capture details of examples within the sample.

### 3.2.3.3 Content and messages in detail

Section three of the codebook contained nine items to provide insight into how the advertising content may appeal or resonate with the possible target audience (Table 3.3). This included depictions of celebrities, inclusion of members of the public (i.e. ordinary ‘punters’), reference to sports or games (e.g. football or horse racing), real-world tie ins (e.g. events), or other methods of appeal (e.g. humour). All items were coded using categorical response options (e.g. Yes/No/Not sure), and a free text item box captured additional illustrative detail.

**Table 3.3: Codebook part three: Content and messaging in detail in gambling advertising**

Does the marketing feature, or make reference to...	Example of such content
...a celebrity or famous sportsperson	Reference to, or depicting, a professional footballer or television presenter.
...a sport or game	Reference to, or depicting, football players, football matches, or football competitions (e.g. UEFA Champions League).
...a team or organisation	Reference to, or depicting, a football team (e.g. Manchester City).
...a real world event	Reference to, or depicting, a real-world football match (e.g. Manchester City vs. Stoke City).
...members of the public	Depicting a crowd at a football match, interviews with supporters, or lottery winner receiving their prize.
...popular culture	Reference to, or depicting, popular culture such as films and television shows.
...real world story	Reference to, or depicting, a current story in the newspapers or reference to seasonal holiday.
...humour	Use of humour, humorous content, or storylines such as slapstick, one-liner jokes, pranks, humorous sketches.
...other substances	Reference to, or depicting, another substance (e.g. tobacco, alcohol, fast food or e-cigarettes).

Notes:

All items were coded Yes/No/Not sure.

For all items, a free text item was included to capture details of examples within the sample.

### 3.2.3.4 Consumer information and messages

Section four of the codebook contained three items to capture the extent to which advertising contained information to inform the consumer of risks and restrictions for gambling. As there are legal restrictions on the minimum age to gamble in the UK ( $\geq 16$  years old for lotteries and  $\geq 18$  years old for other gambling such as sports betting), the first item concerned the visibility of age restriction messages (e.g. ‘18+’). The second item measured the visibility of any consumer protection messages or promoting sources of support for gambling-related harm (e.g. ‘*When the fun stops, stop. Begambleaware.org*’). As gambling is often associated with stipulations on placing the bet or obtaining outcomes (e.g. bonuses or cash withdrawals or eligibility to take part in the gamble), the final item measured the visibility of Terms and Conditions (T&Cs).

All three items were measured on a five-point scale (1 = Very poor visibility – 5 = Very good visibility; Not present). For the final item, a ‘not applicable’ option was also included for advertising that did not promote a specific gamble (i.e. only promoted a brand) and, consequently, no T&Cs were relevant. Ratings were based on the size of each feature in the advertising and the thresholds were developed through piloting and inter-rater discussions

between coders (Table 3.4). Although colour, font, positioning, and (in the context of television and radio) length of time on screen are important in how such messages are received by the audience, they would have been prohibitively complex, subjective and time consuming to code. Visibility in terms of space provided a single metric comparable across all media formats. A free text item was included to capture illustrative detail (e.g. the nature and tone of language). The only exception was radio advertising which, by design, had no visual features. For radio advertising, the visibility was based on estimated duration (in seconds), using the same thresholds.

**Table 3.4: Codebook section four: Ethical practice in gambling advertising**

<b>Ethical practice</b>	<b>Definition</b>	<b>Codes and size threshold<sup>1</sup></b>
Age restriction warning	How much marketing space is afforded to information or warnings that the content is only appropriate for those above the minimum legal purchasing age for that form of gambling ( $\geq 16$ years old for lotteries and $\geq 18$ years old for other gambling)?	<ul style="list-style-type: none"> <li>• No age restriction warning or message</li> <li>• Very poor visibility (<math>\leq 10\%</math> of space)</li> <li>• Poor visibility (11-15% of space)</li> <li>• Acceptable visibility (16-20% of space)</li> <li>• Good visibility (21-25% of space)</li> <li>• Very good (<math>\geq 26\%</math> of space)</li> </ul>
Consumer protection messages	How much marketing space is afforded to information about consumer protection (e.g. gamble responsibly) or signposting to help for higher-risk gambling (e.g. helpline) take up?	<ul style="list-style-type: none"> <li>• No consumer protection message.</li> <li>• Very poor visibility (<math>\leq 10\%</math> of space)</li> <li>• Poor visibility (11-15% of space)</li> <li>• Acceptable visibility (16-20% of space)</li> <li>• Good visibility (21-25% of space)</li> <li>• Very good (<math>\geq 26\%</math> of space)</li> </ul>
Terms and conditions	How much marketing space is afforded to terms and conditions about the bet or gamble promoted (e.g. time limits on free bets, eligibility criteria, or restrictions on any cash withdrawals)?	<ul style="list-style-type: none"> <li>• No T&amp;Cs.</li> <li>• Not applicable – No gamble promoted</li> <li>• Very poor visibility (<math>\leq 10\%</math> of space)</li> <li>• Poor visibility (11-15% of space)</li> <li>• Acceptable visibility (16-20% of space)</li> <li>• Good visibility (21-25% of space)</li> <li>• Very good (<math>\geq 26\%</math> of space)</li> </ul>

<sup>1</sup>For all items, a free text item was included to capture details or examples within the sample, thus providing insight into colour, font, positioning, tone and length of time visible (for internet, television and radio).

### **3.2.3.5 Information presented about the gamble and associated offers**

Section five of the codebook contained ten items to capture information about the gamble(s) promoted (if any) and information about price offers or bonuses. This included whether a bet was presented at all, any suggestions of specific odds or wagers, new customer offers, price offers and bonuses available to all consumers, time limits on the bet, opportunities to minimise

risk, and reference to previous winners or jackpots available (Table 3.5). All items were coded using categorical response options (Yes/No/Not sure), and a free text box captured additional illustrative detail.

**Table 3.5: Codebook section five: Information presented about the gamble and offers**

<b>Does the marketing feature, or make reference, to...</b>	<b>Example</b>
...a specific bet or gamble	Betting on the outcome of football match (e.g. Manchester City to win and Sergio Aguero to score).
...odds for a specific gamble	Odds on a horse to win a race (e.g. Native River to win 7/1).
...suggested stakes or wagers	Suggestion that a £10 bet on a horse to win could return £80 or the cost of a lottery ticket.
...new customer offers	Incentives to new customers such as free bets or bet credits, exclusive or enhanced odds, and reduced risk (i.e. money back if you lose).
...price offers and bonuses for all consumers	Promoting 'odds boosts', enhanced winnings (e.g. double your winnings), or extending likelihood of winning (e.g. paying out on a larger number of places on a horse race).
...free or matched bets	Matching or increasing consumers' monetary stakes (e.g. Deposit £10 play with £40), bonus winnings as free bets, or money back as a free bet if a bet does not win.
...time limited bets or offers	Suggestion that the gamble or offer only applies to a specific sporting event or that offers and bonuses have a time limit to be used.
...minimising risk	Money back if the bet is loses, ability to cash-out in real-time, or suggestions that a consumer can play with free bets without first staking their own money.
...previous winners or likelihood of winning	Photos of winners receiving lottery cheques, testimonials from previous winners (excluding actors winning in fictional scenarios), or suggesting frequency of winning (e.g. someone wins every 10 seconds)
...jackpots or potential prizes	Stating the jackpot of a lottery or referencing other prizes such as cars, holidays, household goods, and event tickets.

Notes:

All items were coded Yes/No/Not sure.

For all items, a free text item was included to capture details of examples within the sample.

### **3.2.3.6 Messages suggested about gambling behaviour and outcomes**

To capture what messages were suggested about gambling behaviour and outcomes, and to assess to what extent gambling advertising complied with existing self-regulations, the sixth codebook section contained 17 items derived from Section 16 of the Non-broadcast Marketing Code of Conduct for Gambling<sup>7</sup> (Table 3.6). These regulations are intended to ensure that communications for gambling marketing are socially responsible, with particular regard to protecting children, young persons under 18 years old, and other vulnerable groups from being harmed or exploited by advertising that promotes gambling. In addition to the regulation items, three new items identified as common themes during the piloting stages were also added. These were: gambling is portrayed as a glamorous and desirable behaviour; the suggestion that gambling is, or should be, a frequent or regular behaviour; and a prompt to gamble at specific times or on specific days. The latter two of these themes could be seen as normalising gambling or encouraging impulse gambling. Given the subjective nature of the items in this part of the codebook, a simple Yes/No/Don't know response option was deemed too reductionist to capture the complexity of marketing messages. All items were instead scored

as either ‘plausible evidence’ (i.e. there was evidence to suggest that the advertising explicitly or implicitly implied that gambling was indispensable or took priority, and thus was not compliant with self-regulations) or ‘no plausible evidence’ (i.e. there was no evidence to suggest that the advert was non-compliant with the code). This enabled the codebook to capture when a coder could not be fully certain that marketing did contain such messages but did not feel confident rejecting that it did not. For each item, a free text box captured additional illustrative detail.

**Table 3.6: Codebook section six: Messages suggested about gambling behaviour and outcomes, including items from existing self-regulatory codes of conduct**

Messages	Satisfied if content....
Socially irresponsible	...portrays, condones or encourages gambling behaviour that is socially irresponsible or could lead to financial, social, and emotional harm (e.g. going all in with bad hand)
Exploit susceptibilities	...exploits the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children, young persons, or other vulnerable groups?
Escape problems	...suggests that gambling can provide an escape from personal, professional, or educational problems such as loneliness or depression?
Financial solution or alternative employment	...suggests that gambling can be a solution to financial concerns, an alternative to employment to achieve financial security?
Indispensable or priority	...portrays gambling as indispensable or as taking priority in life; for example over family, friends, or professional or educational commitments?
Enhance personal qualities	...suggests that gambling can enhance personal qualities, for example, that it can improve self-image or self-esteem, or is a way to gain control, superiority, recognition or admiration?
Peer pressure or fear or missing out	...suggests that there is peer pressure to gamble or disparage abstention [e.g. encourage someone to carry on when they may wish to quit]?
Sexuality or attractiveness	...links gambling to seduction, sexual success, or enhanced attractiveness?
Personal and social success	...implies that gambling is key component in personal success or the success of a personal relationship or social event
Tough or masculine behaviour	...portrays gambling in a context of toughness or link it to resilience or recklessness?
Rite of passage	...suggests that gambling is a rite of passage?
Isolated activity	...suggests that solitary gambling is preferable to social gambling?
Appeal young people	...is likely to be of particular appeal to children or young persons, especially by reflecting or being associated with youth culture? [young person as <17 years old]
Features under 25 year olds	...features a child (<15 years old) or anyone who is, or seems to be, under 25 years old, or anyone behaving in an adolescent, juvenile, or loutish way?
Impressions of luck	...exploits cultural beliefs or traditions about gambling or luck?
Criminal or anti-social	...condones or encourages criminal or anti-social behaviour?
Linked to work	...condones or features gambling in a working environment?
Glamorous <sup>1</sup>	...suggests that gambling is glamorous and desirable or that it or that it can lead to a glamorous and desirable lifestyle?
Normal or regular behaviour <sup>1</sup>	...suggests that gambling is a normal, frequent or daily behaviour?
Time or event specific references <sup>1</sup>	...make a time specific reference to gamble, for example at weekends, in the evenings, or during specific events?

Notes:

For all items, a free text item was included to capture details of examples within the sample.

All items coded Yes/No/Not sure.

<sup>1</sup> Items are *not* part of the Advertising Standards Authority/Committee of Advertising Practitioners Non-broadcast Marketing Code of Conduct [1].



### 3.2.4 Piloting the Codebook and Inter-rater Reliability

Several steps were undertaken to pilot the codebook, quality control coding, and ensure topic and cultural appropriateness. Two members of the research team developed and piloted the original codebook using gambling adverts purposively sampled from several different media channels. Three members of the research team then piloted the revised codebook on six gambling adverts sampled for this study. Following another round of revisions, the two researchers responsible for the main study coding piloted the final codebook on an advert from each of the eight advertising channels ( $n = 16$  in total) to ensure that definitions were applicable across different forms of advertising.

To establish inter-rater reliability, the two researchers responsible for the main study coding independently coded 16 creatives using the final codebook. Inter-rater reliability is the degree of agreement among raters, with higher agreement indicating greater confidence in the findings. The process of developing agreement also provides an opportunity to ensure consistency in findings and address any issues of subjectivity<sup>56</sup>. Both coded two creatives from each advertising channel to ensure consistency across advertising and gambling types. Discrepancies were resolved through discussion. Inter-rater reliability for each item was calculated across the 16 advertising creatives. Average agreement across items was 99% (range: 88-100%) and all items had substantial agreement using the Kappa test of reliability (0.75 – 1.00)<sup>57</sup>.

### 3.2.5 Data Analysis

Data were analysed using SPSS Version 23 and Microsoft Excel. Descriptive statistics were computed for: (1) media channel type; (2) day of the week that the advertising was first recorded; (3) whether the advertising first appeared midweek (Monday – Thursday) or at the weekend (Friday – Sunday); (4) length in seconds (for radio and television); (5) advert type (print press only); (6) type of gambling promoted; and (7) gambling brands referenced. A narrative summary reviewed the websites on which internet advertising appeared.

Frequencies and proportions (%) reviewed how often items in the codebook appeared in advertising. For section four (information about the gamble), a composite score was also computed across the ten features that could be communicated about the gamble and associated offers (Table 3.5). Descriptive statistics for this composite score (mean, standard deviation, mode, and range) provided insight into the overall volume of information presented about the gamble and associated offers.

The free text information for each item in codebook sections two, three, four, five and six were also subject to a thematic analysis. The intention of this was not to establish new themes to add to the codebook, but to provide more detail about each theme. Once all coding was complete, the free text sections for each item were reviewed and main themes narratively summarised. For example, this analysis explored whether most references to real-world events referred to a famous horse racing festival taking place at the time of data collection (The Cheltenham Festival) or whether prices offers and bonuses mostly represented enhanced or boosted odds. For section four of the codebook (consumer information and messaging), this thematic analysis also enabled observations on the use of language, size, font, and positioning of consumer information and messaging in the advertising – all factors that were not captured in the overall visibility score).

### 3.3 Results

#### 3.3.1 Characteristics of the Advertising

##### 3.3.1.1 Media characteristics

Around three-quarters of advertising creatives were print press (75%) and almost one-in-ten were internet (9%). The remaining were television (7%), radio (4%), e-mail (3%), direct mail (1%), door drops (1%), or outdoor advertising (e.g. billboards) (<1%) (Table 3.1).

There was an even split of gambling advertising first recorded<sup>3</sup> mid-week (Monday – Thursday; 54%) and at the weekend (Friday – Sunday; 46%). Saturday had the most observed gambling advertising in the sample (23%) and Sunday had the lowest (10%). There was little variation in the proportion of gambling advertising which first appeared across midweek days (range: 10-16%).

For print press, the types of adverts included explicit advertising promoting a brand or gamble, promotions (e.g. cut-out coupons for free bets), loose inserts (i.e. leaflet advertising), advertorials (e.g. those written in the style of a newspaper article), and other printed content. For television and radio, the median duration of adverts was 30 (range: 10-60 seconds).

Internet advertisements appeared across a variety of websites. These were primarily news websites (e.g. 'mirror.co.uk/football' and 'dailymail.co.uk'), but also included those focused on sport and health ('www.espricinfo.com' and 'www.myfitnesspal.com'), gambling ('www.oddschecker.com'), and search engines (e.g. 'www.aol.com' and 'www.answers.com').

##### 3.3.1.2 Type of gambling and brands featured

The majority of the adverts referenced bookmakers or sports betting (79%). This included a variety of sports such as horseracing, football, golf, greyhound racing, and cricket. Almost one-in-ten adverts promoted lotteries (9%), including both subscription lotteries (e.g. People's Postcode Lottery) and one-off draws (e.g. EuroMillions). The remaining adverts referenced online machine gaming (i.e. online slots or spin-to-win) (3%), online bingo (2%), casino or card games (1%), and football pools (1%). Six adverts (2%) referenced multiple types of betting (e.g. sports betting and casino). For seven adverts, the type of gambling referenced was not clear (2%).

Forty-five gambling brands were promoted across the advertising sample, with Paddy Power (10%), Coral (9%), and Ladbrokes (9%) advertised most. One-in-ten adverts referenced multiple gambling brands (10%), mostly for the purposes of brand comparison or to promote an event linked to another brand. For example, a print advert for Bet365.com explicitly noted that they would "*match or better the prices of the following bookmakers: Ladbrokes, William Hill, Paddy Power, Coral, SkyBet and Boylesports*", while a print advert for UniBet referenced the sponsored "*Coral Cup Handicap Hurdle*".

#### 3.3.2 Design and Content Features of Advertising

##### 3.3.2.1 Brand names and logos

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<sup>3</sup> Ebiquity's database only reported the date that the advertising was *first* recorded. It does not take into account repeat placements of adverts (i.e. one advert may have been displayed on both a weekday and a weekend day).

Almost all adverts (98%) featured a brand name or logo, with most prominently featuring logos (Figure 3.1) (Table 3.7). Adverts which did not feature logos instead relied on well-known brand features, for example recognisable brand colours, slogans and marketing taglines, or depicting screenshots of the company's smartphone app.

**Figure 3.1: Examples of brand logos**



**Table 3.7: Codebook section two: Content and design features in gambling advertising**

<b>Design feature used</b>	<b>%</b>	<b>n</b>
Brand logos	98	295
Brand or marketing slogan	58	174
Big brand claims	30	90
Brand stretching	9	28
Links to other marketing	77	232
Set in particular context or location	32	97
Sign-post to gambling	78	234
Call to action and fostering responses	51	154
Personalisation or community norm	43	130
Music <sup>1</sup>	88	29
Competitions	<1	1
<b>Gender featured<sup>1</sup></b>		
<i>Predominately males</i>	47	87
<i>Predominately females</i>	8	14
<i>Even mixture of males and females</i>	6	11
<i>Not sure</i>	39	72
<i>Not applicable</i>	-	116
<b>Ages featured<sup>1</sup></b>		
<i>16-24 years old</i>	2	4
<i>25-34 years old</i>	15	28
<i>35-44 years old</i>	13	23
<i>45-54 years old</i>	3	5
<i>55-64 years old</i>	3	5
<i>Mixture of ages</i>	13	24
<i>Not sure</i>	52	95
<i>Not applicable</i>	-	116

Notes:

<sup>1</sup> Percentages provided for these items are 'valid %' – i.e. based only on the total sample marketing for which features could be recorded. For example, only television and radio adverts could feature music and 116 examples of marketing did not contain, or refer to, an individual or character and thus age and gender were not applicable.

### 3.3.2.2 Slogans and advertising taglines

Over half of adverts (58%) featured a brand slogan or marketing tagline (Figure 3.2) (Table 3.7). Slogans and taglines were crafted, using wordplay, repetition and other rhetorical devices, to engage interest, differentiate the brand, provide reassurance, and potentially create the expectation of winning (or winning bigger). These short phrases also provide an easily retrievable reflection of the brand's core values. For example, The Health Lottery's "*You win. Good causes win. Everybody wins*" uses repetition to simultaneously create the expectation of the individual consumer winning while reminding them that good causes will also benefit from them playing. Slogans such as UniBet's "*By players, for players*" and Betfred's "*At the heart of Cheltenham*" imply that the brand provides a unique, privileged, or exclusive experience to their consumers, which differentiates them from competitors. Other slogans and taglines potentially suggest that the brand provides an opportunity to increase winnings, such as Ladbrokes's "*Supercharge your odds instantly*" and Betfred's "*Double Delight, Hat-trick Heaven*"<sup>4</sup>.

<sup>4</sup> In Betfred's Double Delight Hat trick Heaven, a consumer places a pre-match bet on a player to be the first goal scorer in selected matches. If that player then goes onto score a second goal in the same game then Betfred pay out at double the odds, and if they score a third goal (i.e. a hat-trick) they pay out at treble the odds in cash.

Figure 3.2: Examples of brand slogans or taglines

The image displays five distinct brand logos and slogans for betting companies, arranged vertically. Each logo is presented on a separate background panel.

- UNIBET**: The brand name is written in white capital letters inside six green circles. Below it, the slogan "By players, for players" is written in white.
- STAR★SPORTS**: The brand name is in white serif font with a gold star between "STAR" and "SPORTS". Below it, the slogan "THE GENTLEMAN'S BOOKMAKER" is written in a smaller, gold serif font.
- MATCHBOOK**: The brand name is in large, white, bold, sans-serif capital letters. Below it, the slogan "IT'S TIME TO BET FAIR!" is written in a glowing blue, sans-serif font.
- PADDY LIVE**: The brand name is in white, bold, sans-serif capital letters with a white underline under "LIVE". To its right, the slogan "SO LIVE, IT'S AWKWARD" is written in a green, sans-serif font.
- 188 BET**: The brand name is in large, bold, sans-serif capital letters, with "188" in orange and "BET" in white. Below it, the slogan "BET INVOLVED" is written in white, sans-serif capital letters.

Below the 188 BET logo, the text "NEW & EXISTING CUSTOMERS" is written in a small, dark blue, sans-serif font. At the bottom of the collage is the **sky bet** logo, where "sky" is in white lowercase letters on a dark blue background and "bet" is in white lowercase letters on a red background. Below the logo, the slogan "BETTING, BETTER" is written in a dark blue, sans-serif font.



### 3.3.2.3 'Big brand claim'

Almost a third of adverts contained a 'big brand claim' (30%) which attempted to differentiate the brand or make a unique statement about its qualities, attributes, or reputation (Table 3.7). These were of three types. The first were price promises or suggestions of superior value for money compared to competitors. For example, Betfred promised the "*Best odds guaranteed on all races at Cheltenham*" and Betfair highlighted "*In 2017 Betfair had the best odds on all English football*" (Figure 3.3). The second promoted unique or exclusive features that their brand offered. For example, the Racing Post boasted of their smartphone app providing a user with "*200 experts in your hands*" and the ability to "*pay a visit to four bookies at the same time*", while Casumo [an online casino] suggested the advertised gamble was "*Just one of 1000+ games*". The final were claims of brand popularity, quality, or other distinctive and unique attributes about the brand. For example, SkyBet promoted themselves as "*Britain's most popular online bookmaker*" while the Health Lottery boast "*So far we've raised £98 million for local good causes across Great Britain*".

**Figure 3.3: Example of a 'big brand claim'**

(emphasis in red box added by authors)

### 3.3.2.4 Brand stretching

Around one-in-ten adverts (9%) contained 'brand-stretching', that is they used the advert to promote multiple arms of the same brand (Table 3.7). Examples included linking up two arms of the same company (e.g. "*BetStars, by PokerStars*" and "*The Health Lottery is bringing you even more fun with HealthGames.co.uk*") (Figure 3.4). For betting companies linked to a broader media organisation, brand stretching also included references to the overall parent company (e.g. the advert for 'StarWins.co.uk' also made reference to The Daily Star newspaper and the advert for SunBingo referred to The Sun newspaper).

**Figure 3.4: Example of brand stretching**

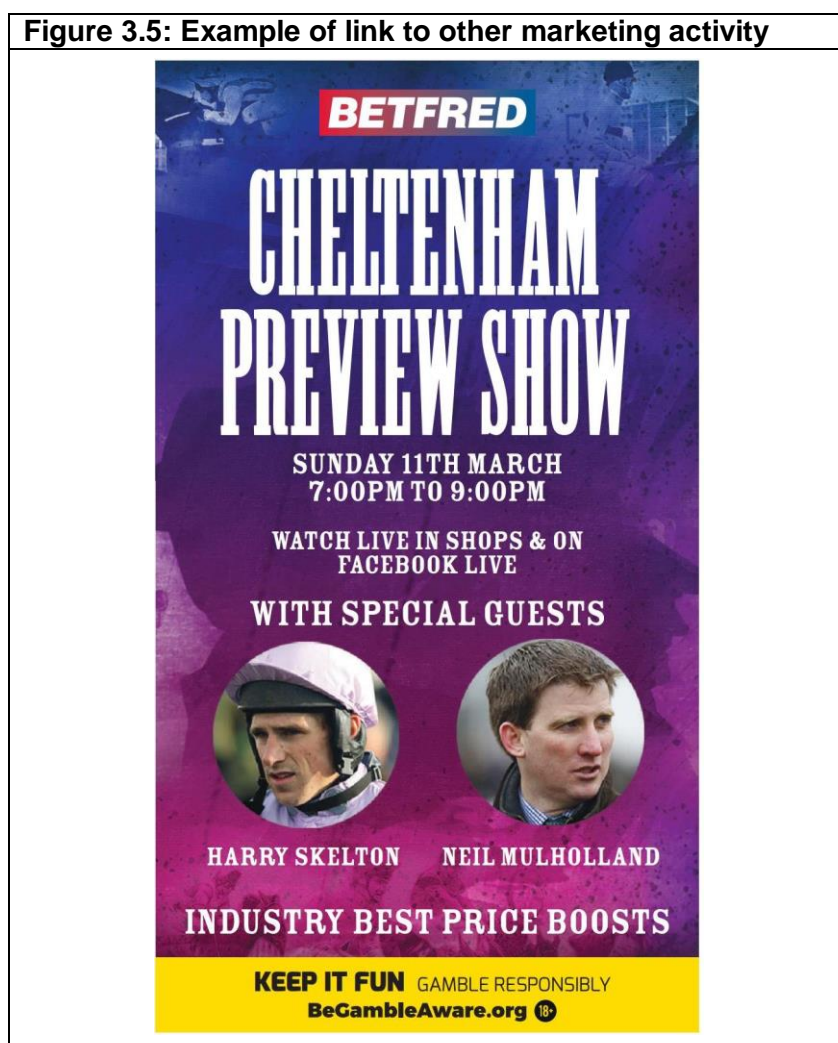
(emphasis in red box added by authors)

### 3.3.2.5 Links to other marketing activity

The majority of adverts (77%) referred to other forms of advertising or marketing, such as a print media advert also promoting social media activity (Table 3.7). References included, but were not limited to, links to brand websites (e.g. “*join 12 million customers worldwide at UniBet.co.uk*”), retail shops, mobile and telephone betting, social media (e.g. ‘*#YourOdds*’ or “*Tune into the Paddy Power Facebook page*”), smartphone applications (e.g. “*Download the app now*”), and links to loyalty or membership schemes (e.g. “*available in shop with your Connect card*”) (Figure 3.5).

Concepts such as ‘the four P’s of marketing<sup>5</sup>’ and the ‘marketing mix’ reinforce that advertising – as sampled in this study – is only one of part of the marketing process<sup>58</sup>. Marketing instead refers to all activities used to communicate with, and influence, consumers across the customer journey. This includes explicit advertising to raise awareness of the brand and services, sponsorship relationships to facilitate brand appeal, ensuring a seamless and positive experience at point-of-play (e.g. in apps and shops), retaining interest through loyalty schemes, and fostering participation with other marketing initiatives (e.g. social media). These examples therefore highlight that advertising performs multiple functions, such as creating awareness of a brand and providing a pathway to engage with other marketing activities.

**Figure 3.5: Example of link to other marketing activity**



<sup>5</sup> The four P’s are Product, Place, Price, and Promotion

### 3.3.2.6 Context of the advertising

Almost a third of adverts (32%) were set in a specific context or location (Table 3.7). For example, adverts for bookmakers typically used visual and audio cues to create the impression of being in a sporting context, in particular horseracing tracks or football stadiums (Figure 3.6). Advertising for lotteries used visual cues to create the impression of being at home. For example, the People's Postcode Lottery showed suburban streets of houses and housing estates. Other contexts not explicitly related to sporting venues included fantasy worlds themed around the brand or game, TV studios, live music venues, and outer space.

**Figure 3.6: Advert setting the context of being at a football match**



(Image is the Camp Nou, home ground of Barcelona football club)

### 3.3.2.7 Ages of characters in the advertising

Three fifths of adverts (61%) clearly featured at least one individual or character. Within this sub-sample, 15% of adverts predominately featured characters estimated to be 25-34 year olds, 13% featured characters estimated to be 35-44 year olds (13%), and 13% featured characters estimated to be a mixture of different ages (13%) (Table 3.7) (Figure 3.7). Only a small proportion of adverts were estimated to feature 16-24 year olds (2%)<sup>6</sup>, 45-54 year olds (3%), or 55-64 year olds (3%). The remaining 52% were coded as 'not sure'. These codes arose when a character(s) face was not clearly visible in the advert (i.e. outside of the frame) or had been obscured (e.g. horse racing jockeys wearing hats and goggles). In these instances, it was not possible to estimate age.

<sup>6</sup> Under current self-regulations, gambling advertising is not permitted to include characters of individuals who are, or appear to be, under the age of 25 years old. This is discussed in greater detail in 3.3.6.14.



**Figure 3.7: Ages featured, showing a mixture of younger age groups (top) and a mixture of older age groups (bottom)**



### 3.3.2.8 Gender of the characters in advertising

In almost half of (47%) of the adverts which featured individuals or characters, these were predominately male. Frequent examples included actors, male celebrities (e.g. former footballer and TV presenter Chris Kamara in Ladbrokes adverts), and male professional sports persons (e.g. footballers, jockeys and golfers) (Figure 3.8). Only a small proportion of

advertising predominately featured females (8%), with most of these being adverts for lotteries or online bingo. Most females depicted were either actors, TV presenters or members of the public, rather than professional sport players. A further 6% featured an even mixture of males and females and the remaining 39% were coded as 'not sure' when either the character(s) were obscured or it was not possible to determine gender.

**Figure 3.8: Genders featured, showing a predominant male advert (top) and predominant feature advert (bottom)**





### 3.3.2.9 Signpost to participate

Three-quarters of adverts (78%) referred to how the audience could participate in the gamble (Table 3.7). Examples included reference to a smartphone app, suggestions to visit the brand website, suggestions of gambling in retail shops, telephone betting, and hyperlinks to websites in e-mails. Advertising for Bet365, for example, included references to multiple different ways that the audience could participate (Figure 3.9).

**Figure 3.9: Advert showing signposts to participate, including website, telephone betting, and downloading the app**

**bet365.com** UK: 08000322365

# PRICE PROMISE

WE WILL BE BEST PRICE ON EVERY HORSE RUNNING LIVE ON ITV RACING.

We will match or better the prices of the following Bookmakers: Ladbrokes, William Hill, Paddy Power, Coral, Sky Bet and BoyleSports.

Offer applies from 10am. Does not apply to Enhanced Place Term markets. Other exclusions apply.<sup>9</sup>

ITV RACING 4/1 OFFER

Back a winner at 4/1 or more on ANY race broadcast LIVE on ITV Racing and get a risk free bet on the next race shown LIVE on ITV Racing.<sup>‡</sup>

Only available to new and eligible customers

1/4 ODDS A PLACE ON ALL CHELTENHAM FESTIVAL RACES  
ALSO  
BEST ODDS GUARANTEED\*†  
Only available to new and eligible customers

ENHANCED ↑ PLACE TERM MARKETS  
1.40 HEREFORD, 2.30 GOWRAN PARK & 3.30 MEYDAN  
1/4 ODDS 1-2-3-4  
1.50 SANDOWN  
1/4 ODDS 1-2-3-4-5  
Price Promise does not apply to these markets

Need Help? Call the National Helpline free on 0800 802 0133. View conditions of all our offers at www.bet365.com. \*Offer applies to bets placed on Win and Each-Way Fixed Odds markets only. All other markets are excluded from this offer. Races covered by Price Promise are also available for Best Odds Guaranteed, for new and eligible customers. †Only available to new and eligible customers residing in Great Britain and Republic of Ireland. Max risk free bet amount is £50 per customer, per race. Bets must be placed in the usual way and can be paid for from your MyBet365 Balance or Bet Credits. Returns from risk free bets will be returned to the applicable balance. Offer applies to bets placed on Win and Each-Way Fixed Odds markets and Enhanced Place Term markets only. All other markets are excluded from this offer. Bets placed using our Telephone Betting service will not qualify for this offer. Cash Out and Early Bet restrictions, event selection & other conditions apply. ‡Only available to new and eligible customers. If you take a price where you place your bet & the SP is bigger you will be paid at the bigger odds. Offer applies to bets placed on Win and Each-Way Fixed Odds markets and Enhanced Place Term markets only. All other markets are excluded from this offer, including Ante Post bets (unless otherwise stated) and Total/Place/Win bets and dividends. All Australian Racing is excluded. \*Best Odds Guaranteed (for new and eligible customers only) & Non-Runner No Bet will apply to all Ante Post bets placed on the Champion Hurdle, Queen Mother Champion Chase, Ryanair Chase, Stayers' Hurdle and the Cheltenham Gold Cup after 14.00 on 2nd January 2018. Best Odds Guaranteed (for new and eligible customers only) & Non-Runner No Bet will apply to all other 2018 Cheltenham Festival races from 18:00 on 6th January 2018. See www.bet365.com for full details.

(Emphasis in red box added by authors)

### **3.3.2.10 Call to action and fostering responses**

Half of adverts (51%) contained a 'call to action' which, in this study, was considered as any attempt to engage or foster a response from the audience or request that they engage in a desired behaviour (Table 3.7) (Figure 3.10). Calls to action used both injunctions that urged immediate participation or created a sense of urgency (e.g. "*Download the app now*", "*Join in*", "*Go for it*", "*Get spins now*" and "*Play now!*") and a range of rhetorical devices, including rhetorical questions (e.g. Betfair's "*Are you ready for more?*", Coral's "*Why request a bet? Get your price instantly*" and Matchbook's "*Why settle for second best? Come join the next generation of betting*"). Although the latter are not commanding a specific action, these phrases and questions do appear to have the intention of fostering an internal response from consumers.

Figure 3.10: Adverts which include a call-to-action

**Ladbrokes**

**MAN CITY V BASEL**

**MAN CITY**  
**5/2**

TO WIN & 5 OR MORE GOALS IN THE MATCH  
Max Stake £50

DOWNLOAD THE APP NOW

Download on the App Store

GET IT ON Google Play

WHEN THE **FUN** STOPS **STOP** BeGambleAware.org

Price subject to fluctuation. 18+ PLEASE BET RESPONSIBLY begambleaware.org - Need Help? Call the National Gambling Helpline on 0808 802 0133

New Customer Offer - Deposit £10, Get £50 Free Bonus!  
If you can't see this message click [here](#)

**CORAL**

**NEW CUSTOMER OFFER**  
**DEPOSIT £10**  
**GET £50**  
**FREE BONUS**

**JUNGLE GIANTS**

**PLAY NOW >>**

18+. New Players only. Min £10 buy-in to get £50 bonus. 24 x (Bonus) wagering reqs apply. Bonus valid for 30 days (bonus and winnings removed). Certain deposit methods only. Bets covering 87% or more of Roulette table don't count to wagering. T&Cs Apply.

**£50 FREE CASINO BONUS EXCLUSIVE TO NEW CUSTOMERS!**

Join Coral.co.uk today and enjoy a new customer only £50 casino bonus. It's as easy as 1-2-3!

1. Register with Coral today
2. Deposit a minimum of £10
3. Get £50 as a free casino bonus!

Use it on exciting casino classics table games like Blackjack, Roulette and Baccarat as well as 100's of big money jackpot slots and scratchcards. Don't miss out!

**PLAY NOW >>**

The Team @Coral

Follow Us Like Us

Download for **Android** Available on the **App Store**

Watch Us

(Emphases added)



### 3.3.2.11 Personalisation and community norms

Almost half of adverts (43%) attempted to personalise the content or imply a sense of social or community norm (Table 3.7) (Figure 3.11). For the majority of adverts, this was achieved by using the second person and possessive pronouns which implied that the advert was aimed specifically at the individual audience member or that the gamble(s) (or any associated winnings) belonged to them. For example, an advert from Betfred suggested “*double or treble your first goalscorer odds if your player scores a second or third goal*”, a radio advert from takeabreakbingo.co.uk suggested their website was “*jam packed with all your favourite bingo games*”, and an advert from the Health Lottery stated “*We guarantee you £10,000*”<sup>7</sup>. The People’s Postcode Lottery placed community norms as a central part of their advertising. For example, several adverts showed a neighbours in a group photo all holding their respective jackpot cheques (see Figure 3.7), while another said “*Over half of the postcodes in Great Britain are now playing! Your neighbours could be playing already.*”

**Figure 3.11: Advert which includes personalisation**

Only  
**£1**

Promoted on behalf of 51 Society Lotteries

The Health Lottery™

**We guarantee you  
£10,000**

When you match 4 balls plus bonus ball

**Play now**

In-Store • Mobile • Online [www.healthlottery.co.uk](http://www.healthlottery.co.uk)

TESCO Morrisons ASDA Sainsbury's  
 M&S Next London's Budgets Nisa Coatesworth  
 16+ BeGambleAware.org

Players must be 16 or over. Terms and conditions, game rules & procedures apply. The Health Lottery™ logo is a registered trademark of The Health Lottery Ltd. The Health Lottery scheme manages 51 society lotteries that operate in rotation and each represents a different geographical region of Great Britain. This week's society lottery is HealthEquality West London, next week's will be HealthBelief Northamptonshire & Leicestershire. For more details on which society lottery is running each week please visit [www.healthlottery.co.uk](http://www.healthlottery.co.uk) or ask your Health Lottery retailer.

Download on the App Store

<sup>7</sup> Emphases added in each example.

**3.3.2.12 Use of music**

Music was only possible in television and radio adverts. Within this sub-sample, over three-quarters of adverts (88%) contained music (Table 3.7). Music was used both as a secondary component in the advert, for example as a backing track, and also as a main feature, for example all actors singing a song. Tone and style of music varied, and included rock music, hip-hop or grime, electro or house dance music, orchestral music, TV theme songs, and remixes of well-known songs. All music appeared to have the intention of creating a sense of excitement and fun, or of amplifying tension and elation, for example by softening the sound during a critical moment in the gamble (i.e. the closing stages of a horse race) before reaching a crescendo when an individual was shown winning.

**3.3.2.13 Use of competitions**

Only one advert featured a competition which appeared to be largely separate from the promoted gamble. This was a direct mail advert for The Football Pools which included additional information about prize draws to win “Amazing price bundles” (including smart tablets, televisions, and household electrical appliances) and high value vouchers for high street retailers (Figure 3.12).

**Figure 3.12: Advert featuring a competition**

**MAKE THIS YOUR...  
BEST BUY  
OF THE SEASON  
£5 MILLION TOP PRIZE!**

**GUARANTEED WINNERS EVERY WEEK!**

**PLAY TODAY FOR THE CHANCE TO WIN  
£5 MILLION, PRIZE DRAWS AND MUCH MORE...**

**SUPER PRIZE DRAW**  
PLAY TODAY FOR YOUR CHANCE TO WIN  
THIS AMAZING PRIZE BUNDLE!

**We've got a £1,000 Marks & Spencer  
voucher available to be won...**  
Play today and we'll automatically  
include you into the draw!  
Imagine what you could treat yourself to  
with **£1,000!**

**Direct Debit is the easy and convenient  
way to play, plus, you will receive...**

- **4 FREE** games worth **£12**.
- **£25 Voucher** to spend in over 50,000 outlets  
once you've played for 3 months.

Redeemable on retail, dining, travel and more...  
This is the card that does it all!

Pools Privileges is the loyalty programme  
we've created to say **thank you** to our players!  
Play today and you can sign up to become a Pools Privileges  
Member to access great offers and more chances to win!  
Look for more details in your acknowledgement.

[www.footballpools.com/privileges](http://www.footballpools.com/privileges)

**CREATING WINNERS SINCE 1923!**

### 3.3.3 Content and Messages in Detail

#### 3.3.3.1 Celebrities or famous sportspersons

A third of the gambling adverts (33%) referred to a famous celebrity or sportsperson (Table 3.8) (Figure 3.13). There were frequent references to famous jockeys (e.g. Ruby Walsh featured extensively in Paddy Power's Cheltenham advertising campaign), racehorses (e.g. *Road to Respect*, *Un de Sceaux*, and *Faugheen*), and famous horse trainers (e.g. Willie Mullins). Famous professional footballers also featured frequently, including Mohammed Salah (Liverpool), Romelu Lukaku (Manchester United), Eden Hazard (Chelsea), and Sergio Agüero (Manchester City). Major and minor celebrities of television and film also featured. This included Ladbrokes's brand ambassador Chris Kamara, The People's Postcode Lottery brand ambassadors Judy McCourt (radio and TV presenter) and Jeff Brazier (TV presenter and reality TV star), and presenters of one of Sky Sport's flagship weekend programmes 'Soccer Saturday' (e.g. Jeff Stelling and Paul Merson). References to celebrities, particularly those associated with the sports to which gambles were also linked, may add a perceived sense of glamour, capitalise on social and cultural appeal of the celebrity to increase brand salience, or enhance the perceived credibility of the brand and suggested gamble.

**Table 3.8: Codebook section three: Content and messages in detail**

<b>Topical associations or references</b>	<b>%</b>	<b><i>n</i></b>
Celebrities or sportspersons	33	98
Sport or game	89	266
Team or organisation	33	100
Real world event	73	218
Members of the public	6	17
Popular culture	5	15
Real world story	2	7
Humour	12	37
Other substances	3	10



**Figure 3.13: Advert which features a famous celebrity or famous sportsperson, including famous jockey Ruby Walsh (top) and the presenters of Sky Sport's flagship programme Soccer Saturday (bottom)**

The image shows two billboards. The top billboard is for Paddy Power, featuring a shirtless jockey (Ruby Walsh) in a green helmet and holding a microphone. The text reads "PUNTERS. CLEAN UP THIS CHELTENHAM." and "PADDYPOWER". Below the main text is the slogan "WHEN THE FUN STOPS STOP" and the BeGambleAware.org logo with an 18+ rating.

The bottom billboard is for Sky Bet, featuring the presenters of Soccer Saturday with their arms raised in celebration. The text reads "soccer special PRICE BOOST LIVERPOOL, CARDIFF AND FULHAM ALL TO WIN" and "WAS 7/2 NOW 11/2". It also includes "NEW & EXISTING CUSTOMERS", the Sky Bet logo with the slogan "BETTING, BETTER", and "MAX STAKE VARIES - SEE BET SLIP FOR DETAILS". Below the main text is the slogan "WHEN THE FUN STOPS STOP" and the BeGambleAware.org logo with an 18+ rating.

Additional text on the bottom billboard includes: "DOWNLOAD THE APP NOW" with Google Play and App Store logos, and a small disclaimer: "18+ only. T&Cs apply. Available for new and existing customers. Live from 8pm 05/03/2018 until 7.45pm 06/03/2018. Max stake terms apply. Sky Bet withhold the right to withdraw this offer at any time without prior notice. Visit skybet.com for more information."

### 3.3.3.2 Sports or games

Most gambling adverts (89%) referred to a sport or game (Table 3.8). These references were mostly inter-linked to professional sports such as horseracing, cricket, football (both national and continental matches), and greyhound racing (Figure 3.14). References either depicted the sport being played, referred to real-world events or sport persons, or depicted cues and equipment synonymous with the sport (e.g. a jockey's outfit or football shirts). In all cases, the professional sports were linked to the type of gambling promoted. For non-bookmaker adverts, references included games available on the casino or online machine gambling (e.g. "you'll find all your favourite games in one place, including Starburst, Cleopatra, Gonza Squares, and the Ultimate Slingo collection" and "Cool bucks online slots") or references to traditional gambling activities such as bingo or casino card games.

Figure 3.14: Advert which refers to a sport or game

**CORAL**

**CHAMPION HURDLE**

**FAUGHEEN TO FINISH SECOND**

**NOW 9/2**

18+ Odds accurate at time of printing. Available online & in-store. Limits may apply. Full terms at Coral.co.uk

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**BETFRED**

**TODAY'S GREYHOUND OFFERS**

Available online & on mobile.

**25% FORECAST BONUS**

ON ALL RPTV RACES AT **PETERBOROUGH**

Single bets only.

**50% BONUS ON AN ALL CORRECT YANKEE**

Available on the four races opposite.

**LIVE STREAMING AVAILABLE ON ALL SIS & RPTV RACES ON BETFRED.COM**

**KEEP IT FUN GAMBLE RESPONSIBLY BeGambleAware.org 18+**

Prices subject to fluctuation. Betfred rules apply.

Peterborough 6:48PM		Sunderland 6:56PM	
1 Kilara Razz	5/1	1 Parkers Lee	9/2
2 Keeperhill Ruby	4/1	2 Conors Bolt	6/1
3 Rohan	9/2	3 Fairholme Posh	5/2
4 Shanless Frank	6/1	4 Kielduff Manor	7/2
5 Lemming Clover	11/4	5 Working Annie	7/2
6 Duchess Jane	3/1	6 Hardwick Adomah	6/1

Sunderland 8:43PM		Peterborough 9:37PM	
1 Mucho Macho Ash	9/4	1 Pennys Honey	11/4
2 Abbys Attitude	7/2	2 Garnaman	4/1
3 Love Is Power	5/1	3 Alex My Friend	11/2
4 Champagne Laura	5/1	4 Princess Freya	4/1
5 Shellam Larry	5/1	5 Thunder Storm	4/1
6 Salems Zane	5/1	6 Sion Hill	9/2

Although reference to a sport is a logical necessity to communicate a sport-specific gamble (i.e. around a football match) it also has wider significance. First, professional sports provide an opportunity for brands to associate themselves with attractive and emotionally arousing phenomena which are likely to increase their visibility, appeal, and potential influence among target consumers. This enables them to incorporate features of this into the brand identity and advertising narrative (e.g. team names, logos, shirts, match listing). Second, a brand can also capitalise on existing marketing activities that are already associated with that sport, such as other television adverts, print press articles, or social media discussions around a high-profile football match. Third, there are existing suggestions that linking gambling to sport helps to facilitate the normalisation of gambling in society and may influence attitudes in consumers.



### 3.3.3.3 Team or organisation

A third of gambling adverts (33%) referred to a specific team or external organisation<sup>8</sup> (Table 3.8). These were mostly references to sporting teams linked to the promoted gamble (Figure 3.15). This included football teams from the UK, Europe, and even as far afield as South America and Australia. Examples included well-known teams such as Liverpool, Manchester City, Manchester United, Real Madrid, Arsenal, AC Milan, Tottenham Hotspur, and Barcelona. Beyond football, other frequent references included sponsors of sporting events (e.g. “*RSA Insurance Novices Chase*” and “*The RyanAir Chase*”), companies displayed as sponsors on sporting merchandise (e.g. Chevrolet sponsor Manchester United’s shirts), references to retailers where lottery tickets could be bought (e.g. Tesco or the Post Office), and newspapers linked to the gambling brand (e.g. The Sun). Reference to specific teams and organisations potentially generate similar reactions among consumers, and perform similar marketing functions, as do references to specific sports and celebrities (see 3.3.3.1 and 3.3.3.2).


**Figure 3.15: Reference to teams or organisations**

betfair

**BEST ODDS  
ON THE  
PREMIER LEAGUE**

oddschecker  
APPROVED ✓

WE HAVE A NEW ANDROID APP 

WHEN THE **FUN** STOPS  **STOP**

BeGambleAware.org 18+

Above statement based on Betfair Sportsbook offering the lowest average match overrounds since 1/1/17 on Premier league games. Betfair Sportsbook prices compared against leading UK bookmakers. Data provided by TX Odds & Betradar. Full terms at promos.betfair.com

<sup>8</sup> The variable excluded reference to other gambling brands (e.g. Bet365.com referencing Ladbrokes) as this item was covered under ‘brands referenced’ in the design features.

### 3.3.3.4 Real world events

Almost three-quarters of gambling adverts (73%) referred to a real world event, most of which were linked to the gamble(s) promoted (Table 3.8). Many of these featured in advertising for bookmakers, and referred to sporting events. There were frequent references to the Cheltenham horse racing festival that took place across the second week of this study. Examples included “2.10pm Cheltenham race today”, “At the heart of Cheltenham, 13<sup>th</sup>-16<sup>th</sup> March”, and “#BoostYourCheltenham”. There were also frequent references to the places, dates, and times for other races, including for both horse (e.g. “Get High Five today at Uttoxeter and Kempton”) and greyhound racing (e.g. “50% Tricast bonus on all RGPTV races at Nottingham”). There were also frequent references to football matches, including English Premier League (e.g. “Man Utd v. Liverpool. Today. 12:30pm”) and UEFA Champions League matches (e.g. “Man City v FC Basel, tonight 7.45pm, Live on BT Sport 3”) (Figure 3.16).

In addition to the enhanced potential appeal to consumers and wider marketing opportunities provided (summarised in 3.3.3.2), references to real-world events may also create a sense of immediacy or urgency to take part in the bet or imply that gambling is a behaviour intrinsically linked with that event. Such references may also embed the intention to gamble into existing behaviour around that event, for example if planning to watch a football match or horse race on television or at the event.

**Figure 3.16: Adverts which refer to real world events**

**BETFRED**

**DOUBLE DELIGHT & HAT-TRICK HEAVEN**

double or treble your first goalscorer odds if your player scores a second or third goal

**Hibernian v Hearts**  
Tonight 7:45pm, live on Sky Sports Football

**Man Utd v Liverpool**  
Saturday 12:30pm, live on Sky Sports

**Chelsea v Crystal Palace**  
Saturday 5:30pm, live on BT Sport 1

**Aston Villa v Wolves**  
Saturday 5:30pm, live on Sky Sports Football

**Rangers v Celtic**  
Sunday 12:00noon, live on Sky Sports Football

**Arsenal v Watford**  
Sunday 1:30pm, live on Sky Sports

**Nottm Forest v Derby**  
Sunday 2:30pm, live on Sky Sports Football

**Bournemouth v Tottenham**  
Sunday 4:00pm, live on Sky Sports

**Stoke v Man City**  
Monday 8:00pm, live on Sky Sports

IN SHOPS  
MOBILE  
ONLINE

**KEEP IT FUN GAMBLE RESPONSIBLY**  
**BeGambleAware.org** 18+

Double Delight/Hat-trick Heaven: Single bets only. Does not apply to in-play bets. Betfred rules apply.

### 3.3.3.5 Members of the public

One-in-twenty gambling adverts (6%) referred to what appeared to be ordinary members of the public (i.e. not clearly actors, celebrities, or sportspersons) (Table 3.8). Examples included adverts which depicted members of the public receiving their prize (e.g. lotteries or pools) and members of the crowd at sporting events (Figure 3.17). It is plausible that depicting members of the public may imply, or create the impression of, gambling as something that ‘everyday’ people engage in. It may also increase the perceived credibility of the marketing message or make the likelihood of winning feel more authentic to consumers.

**Figure 3.17: Advert which features presumed members of the public**

**NO ROLLOVERS**  
only playing postcodes are entered!

Join in at [postcodelottery.co.uk/ta8](https://postcodelottery.co.uk/ta8)  
or call **0800 368 4856**

**PEOPLE'S POSTCODE LOTTERY** Prizes announced every day for £10 a month

Sign up by 22 March

£150,000

### 3.3.3.6 Popular culture

One-in-twenty adverts (5%) referred to popular culture (Table 3.8). Several referred to popular television shows, including sports programmes (Sky Sport's Soccer Saturday) and soap operas. The radio advert for Britain's Got Talent Games, for example, included a voiceover by TV judge David Walliams, the show's theme tune, the narrator taking part in an audition as per the show's format (performing a hip-hop act), and the iconic buzzer sound to vote them off. Other examples included references to tabloid newspapers (The Sun, The Mirror, and the Daily Mail) and reference to films. Some advertising referred to music culture, for example, the print advert for 188Bet mimicked a music festival poster (Figure 3.18).



**Figure 3.18: Reference to popular culture, in this instance mimicking the poster for a music festival**

**CHELTENHAM A PROPER FESTIVAL**

<p><b>TUESDAY</b>  <b>HEADLINE ACT:</b>  <b>10% STAKE REFUND ON NET LOSSES UP TO £100</b></p>	<p><b>WEDNESDAY</b>  <b>HEADLINE ACT:</b>  <b>BEST PRICES ON ALL MULLINS HORSES</b></p>	<p><b>THURSDAY</b>  <b>HEADLINE ACT:</b>  <b>MONEY BACK IF YOUR HORSE FALLS UP TO £100</b></p>	<p><b>FRIDAY</b>  <b>HEADLINE ACT:</b>  <b>EXTRA PLACE, EVERY RACE</b></p>
---	---	--	--

**188BET**  
 BET INVOLVED

18+ BeGambleAware.org. Promotion only applies to single, win market, final declaration and pre-race bets on Day 1 of the Cheltenham Festival, placed on Tuesday 13th March 2018. A minimum of three (3) bets of the same stake value on different selections (Minimum of €€10 per bet) must be placed to qualify. 10% stake refund on all combined net losses up to €€100 per member will be credited as a Free Bet. Free Bet must be wagered once (1) at minimum odds of 2.0 in Horse Racing before any withdrawals can be made. Promotion only applies to single, win/each-way markets, final declaration and pre-race bets placed on Wednesday 14th March 2018. Best price or just best price on all Willie Mullins runners in comparison with the following list of bookmakers: Bet365, Ladbrokes, William Hill, Paddy Power, Coral, Sky Bet, Betfred, Betway, BetBright, BetVictor and BoyleSports with the exception of any 'stake limited promotional offers'. Promotion only applies to single, win market, final declaration and pre-race bets on any race at Day 3 of the Cheltenham Festival, placed on Thursday 15th March 2018. Refunded stake will be credited as a Free Bet up to a max of €€100 per member per race. Free Bet must be wagered once (1) at minimum odds of 2.0 in Horse Racing, within 30 days before a withdrawal can take place. We are paying an extra place in every race on Day 4 of the Cheltenham Festival on Friday 16th March 2018. 12 - 15 runners (Handicap Races) = 4 Places. 16+ runners (Handicap Races) = 5 Places. 12+ runners (Non-Handicap Races) = 4 Places. Promotion only applies to single/each-way markets, final declaration and pre-race bets. Available to new and existing members based in the UK and Ireland. Terms apply. Visit 188bet.co.uk. Please gamble responsibly.

### 3.3.3.7 Real world story

Only a small proportion of adverts (2%) referred to a real-world story (i.e. not a fictional narrative) (Table 3.8). One bookmaker, for example, produced an advertorial which featured newspaper-style stories, interspersed with odds for suggested gambles, which discussed real-world stories in the Scottish and English Premier Leagues and the Cheltenham horseracing festival (Figure 3.19). Concerning non-sport advertising, print adverts for The Health Lottery included short summaries of real-world causes which had benefited from their charitable donations: for example, “£1.8 million raised for South East London by Health Wisdom” and “£2 million raised for Staffordshire and Shropshire by HealthFair”.

Figure 3.19: Advert which makes reference to real world stories

**A. McLean BOOKMAKERS** **DO YOU WANNA BET?**

**OUR RESIDENT BOOKMAKER [betmclean.com](http://betmclean.com) OFFERS YOU THEIR HOTTEST TIPS AND BEST ODDS EACH AND EVERY WEEK IN SUNDAY LI**

**SCOTTISH PREMIERSHIP**

IT'S win or burst for Rangers (5/2) when they take on Celtic (EVS) at Ibrox this afternoon. Victory will reduce the top of the table gap to just three points, but a win for Brendan Rodgers' champions, who have a game in hand, will effectively seal a seventh successive league title. Since drawing at Celtic Park in December, Graeme Murty's (above) men have won 10 games, compared to Celtic's eight out of 11. Rangers have scored 33, conceding nine, while the Hoops have hit 20 and shipped eight. Over them to Josh Windass (9/1, first goalscorer) with 10 goals in eight matches, including two hat-tricks, to lift Rangers' hearts. Celtic might be happy with a draw (5/2).



# WILLIE OR WON'T HE?



**CHELTHENHAM HOPES: Willie Mullins**

**PREMIER LEAGUE**

HOW much longer can Arsene Wenger (below) survive? Defeat at home to Watford (11/2) today will just add to all the pain at a club now sixth, and hopelessly adrift, having lost five of their last seven. The triumph at AC Milan will ease pressure, but winning the Europa League seems to be Wenger's only hope. Meanwhile, after their Champions League exit, Spurs (8/15) will be keen to see off Bournemouth (5/1). But the Cherries have lost just one of their last 10 games. Harry Kane (5/2 - 1st Goalscorer) has hit six in his last four PL games at Bournemouth, including a hat-trick on his only visit to this venue in October 2015 when Tottenham won 5-1.



**A. McLean BOOKMAKERS** *Do you wanna bet?*

**TELEBET: 0800 121 4567** OR 02890 663949 FROM A CONTRACT MOBILE!

**4/1** ← **SUNDAY FOOTBALL TREBLE**

**CELTIC - ARSENAL - TOTTENHAM**

Kicks off 12:00pm Price subject to fluctuations



### 3.3.3.8 Use of humour

Around one-in-ten adverts (12%) used humour to engage audience interest, foster a positive reaction towards the advert, or increase the likelihood of recalling the advert (Table 3.8). Examples included observational humour (e.g. a joke about the prize money that Manchester United could win in the FA cup would pay for star player Alexis Sanchez's piano lessons), visual humour (e.g. footballers with enlarged bobble-style heads), and sketches (e.g. a EuroMillions advert showed a millionaire accidentally walking into the glass door of their posh house, with the tagline "*nicer problems to have*"). In particular, Paddy Power's advertising campaign for the Cheltenham Festival used the phrase "*So live, it's awkward*". In accompaniment, they produced adverts showing famous jockey Ruby Walsh caught in awkward situations and wearing a bemused expression, including getting dressed, in the bath, and getting a haircut (Figure 3.20).



Figure 3.20: Advert which attempts to use humour

**CHEL TENHAM DAY 4**

**PADDY LIVE** SO LIVE. IT'S AWKWARD

**MONEY BACK  
AS A FREE BET  
ON ALL LOSERS**

IN THE TRIUMPH HURDLE

**IF APPLE'S SHAKIRA  
WINS**

**1.30PM TODAY**

MAX FREE BET £10  
NEW & EXISTING CUSTOMERS

**AND**

**WE'RE PAYING 4 PLACES  
ON THE GOLD CUP**

INSTEAD OF THE USUAL 3  
1/5 ODDS

**PADDYPOWER.**

WHEN THE **FUN** STOPS **STOP**

BeGambleAware.org 18+

Applies from 00:01 2nd March, to bets on the Triumph Hurdle (13.30) at the Cheltenham Festival on 16/03/18. Applies to pre-race win (and the win part of each way) single bets only. Free bet refund is max £10 per customer. If Apple's Shakira does not run, the offer will apply to the starting price (SP) favourite. Joint/ Co favourites will qualify as the SP favourite. Free bet stake not included in winnings, valid for 7 days. Available Online, Mobile, Phone, Retail and Text bets. Does not apply to Tote bets or cashed out bets. See [promos.paddypower.com](https://promos.paddypower.com) and in shops for further details. Extra place: Applies to bets placed after 10am on Wednesday 14th March 2018, at 1/5 odds. Applies to all Online, Mobile, Phone, Text, PP Messenger and Retail shop bets. See [paddypower.com](https://paddypower.com) for full T&Cs.

### 3.3.3.9 Other substances

A small number of adverts (3%) referred to another substance (Table 3.8). Most of these were for alcohol. This included explicit phrases such as “*Every festival has a main tent. Ours has Guinness in it*” and “*Pints on Paddy*”, and more subtle references such as horses or greyhounds which had alcohol references in the name (e.g. *Rising Brandy* and *Guinness One*) (Figure 3.21). Other advertising referred to food, such as people dining at a banquet of cakes and references to takeaways. No advertising referred to tobacco or e-cigarettes.



**Figure 3.21: Advert which features reference to another substance**



### 3.3.4 Consumer Information and Messaging

#### 3.3.4.1 Age restriction messages

Almost one-in-seven adverts (14%) did not feature any age restriction warnings at all (Figure 3.22a) (Table 3.9). Although the majority of remaining adverts did include age restriction warnings, these were mostly rated as ‘very poor’ visibility (84%). These messages took up no more than 10% of available advert space, with most taking up between 1-5% of space. Most messages were either small “18+” logos presented in the same banner as a consumer protection message or phrases such as “*Over 18s only*” in the T&Cs. Most messages were in small font sizes (relative to the rest of the advertising), were outside of the main frame of the advert (i.e. in banners across the bottom of an advert or at the far side), and juxtaposed in terms of colour or size against more visually stimulating advert content (Figure 3.22b). All six adverts which had age restriction warnings rated as ‘poor’ visibility were radio adverts, in which the voiceover clearly pronounced the message towards the end of the advert.

**Table 3.9: Codebook section four: Visibility of ethical practice features**

<b>Ethical practice feature<sup>1</sup></b>	<i>n</i>	%
<b>Age warning messages</b>		
<i>None present</i>	42	14
<i>Very poor visibility</i>	251	84
<i>Poor visibility</i>	7	2
<i>Acceptable visibility</i>	-	-
<i>Good visibility</i>	-	-
<i>Very good visibility</i>	-	-
	-	-
<b>Consumer protection messages or signpost to support</b>		
<i>None present</i>	42	14
<i>Very poor visibility</i>	163	54
<i>Poor visibility</i>	90	30
<i>Acceptable visibility</i>	4	1
<i>Good visibility</i>	-	-
<i>Very good visibility</i>	1	<1
<b>Terms and conditions<sup>2</sup></b>		
<i>None present</i>	31	11
<i>Very poor visibility</i>	207	73
<i>Poor visibility</i>	30	11
<i>Acceptable visibility</i>	5	2
<i>Good visibility</i>	7	3
<i>Very good visibility</i>	5	2
<i>Not applicable<sup>3</sup></i>	15	-

Notes:

<sup>1</sup> Very poor visibility ( $\leq 10\%$  of advertising space); Poor visibility (11-15% of space); Acceptable visibility (16-20% of space); Good visibility (21-25% of space); Very good visibility ( $\geq 26\%$  of space).

<sup>2</sup> Percentages reported are valid, i.e. excluding advertising for which no T&Cs were applicable (i.e. no bet presented).

<sup>3</sup> Not applicable = No specific gamble presented in the advertising (i.e. only about the brand) and thus no terms and conditions applicable.

**Figure 3.22a: Advert which does not feature an age restriction warning**

**CORAL**

**PRICE BOOST**

**CARDIFF, MIDDLESBROUGH & BLACKBURN ALL TO WIN**

Max Bet £10. Available for a Limited Time. Available from 12.30pm Saturday.  
Bet void if any match abandoned.

DOWNLOAD THE APP NOW

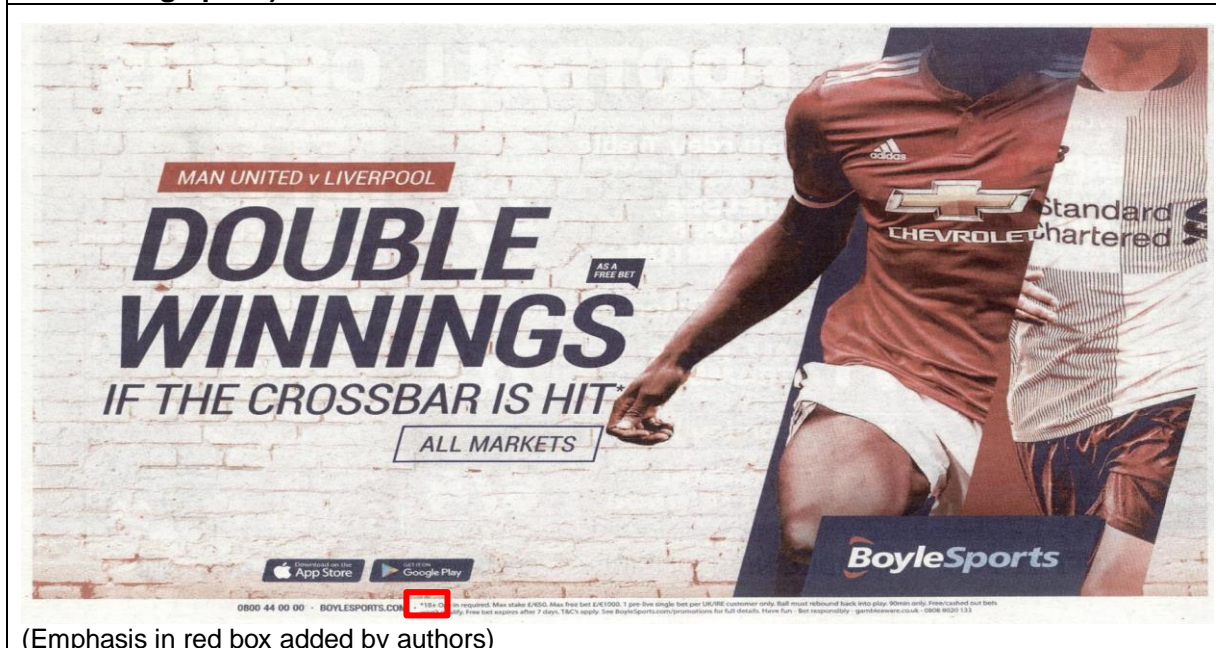
Download on the App Store

GET IT ON Google Play

Price Boost: Offer Available from 12.30pm 10/03/18 for a limited time only. Max Bet £10, stake limits may apply. Singles only. The 'Was' price advertised is a guide price only, prices are subject to fluctuation.



**Figure 3.22b: Advert with a very poor age restriction warning (less than 10% of advertising space)**



(Emphasis in red box added by authors)

### 3.3.4.2 Consumer protection messages

Around one-in-seven gambling adverts (14%) did not contain any consumer protection message or signpost to support for gambling-related harm (Figure 3.23a) (Table 3.9). In approximately half of adverts, the consumer protection messages were rated as ‘very poor’ visibility (54%) – less than 10% of available space – while in almost a third (30%) of adverts, the consumer protection messages were rated as having ‘poor’ visibility – less than 15% of space. As per age restrictions, these messages were mostly in small font sizes (relative to the rest of the advert), were outside of the main frame of the advert (i.e. in banners across the bottom of an advert) or were juxtaposed against visually stimulating advert content (Figure 3.23b). Of the four adverts rated as having ‘acceptable’ visibility (i.e. at least 20% of advert space), three were radio adverts in which the message was clearly narrated at the end, and one was a television advert. One internet advert had a consumer protection message rated as ‘very good’ visibility, as the message took up the entirety of the final frame (Figure 3.23c).

Examples of the phrases used in consumer protection messages included “*Enjoy gambling responsibly*”, “*BeGambleAware.org*”, “*Play it safe*”, “*Gamble responsibly*”, “*Please bet responsibly*”, “*When the fun stops, stop*”, and “*Play responsibly*”. Some advertising also provided signposts to help or support, for example “*For advice and information visit [www.begambleaware.org](http://www.begambleaware.org)*” and “*Need help? Call the National Gambling Helpline on 0808 0802 0133*” with most instances appearing in the T&Cs. In particular, gambling adverts were often found to use phrases associated with pleasure and positivity in their consumption protection messages, for example “*Keep it fun*” and “*When the fun stops, stop*”, as opposed to language which explicitly highlights the negative or potentially punitive consequences of higher-risk gambling.

Figure 3.23a: Advert which contains no consumer protection gambling message

**BETFRED**  
— AT THE HEART OF —  
**CHELTENHAM**  
13TH - 16TH MARCH

**BEST ODDS  
GUARANTEED**  
ALL RACES  
AT CHELTENHAM

**TREBLE THE ODDS**  
FOR ONE WINNER ON A  
**LUCKY 15**  
PLUS UP TO 100% BONUS ON ALL  
CORRECT CHELTENHAM LUCKY BETS

**5 PLACES**  
ON THE 2:50PM  
& 4:50PM RACES  
**4 PLACES**  
ON THE 5:30PM RACE

**RSA INSURANCE NOVICES' CHASE**  
Cheltenham, 2:10pm. Live on ITV

5/2	Presenting Percy	9/1	Elegant Escape
7/2	Monalee	14/1	Ballyoptic
13/2	Al Boum Photo	18/1	Bonbon Au Miel
7/1	Dounikos	33/1	Allysson Monterg
8/1	Black Corton	100/1	Full Irish

Each-way 1/5 1,2,3

**BETWAY QUEEN MOTHER CHAMPION CHASE**  
Cheltenham 3:30pm. Live on ITV

6/5	Altior	40/1	Ar Mad
11/4	Douvan	40/1	Charbel
10/3	Min	50/1	God's Own
12/1	Politologue	66/1	Ordinary World
25/1	Special Tiara		

Each-way 1/5 1,2,3

Best Odds Guaranteed - Take a price on any Cheltenham race from 6pm the day prior to racing and if the Starting Price is bigger, we'll pay you out at that price. Applies to Early Prices only. Bonuses - 25% bonus on all correct Lucky 15s, 50% bonus on all correct Lucky 31s, 100% bonus on all correct Lucky 63s. All selections within the Lucky bet must be on Cheltenham Festival runners for the bonus to apply, 20p minimum unit stake. Lucky bonuses apply to bets placed from Saturday 10th March 2018.



Figure 3.23b: Advert which has very poor consumer protection message (less than 10% of advert space)

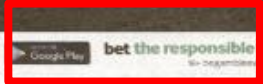
**MONEY BACK**  
as a Free Bet  
**IF YOU LOSE**  
on the FIRST & LAST race every day\*

**Cheltenham Festival**

**betway**  
for the love of the game

\*Available to new and existing customers. Min stake per bet: £2. Max Free Bet £10. One Free Bet per customer, per race, credited within 24 hours. Free eligible bet counts. Eligible bets must be placed on the first or last race each day of The Cheltenham Festival. Eligible bets must be single bets. Only bets placed from 12:00 on Tuesday 29 March 2016 are valid. New money bets only. Full terms apply.

Download on the App Store | | **bet the responsible way** betway.com



(Emphasis in red box added by authors)

**Figure 3.23c: Advert which had consumer protection message with very good visibility ( $\geq 25\%$  of advert space, still taken from final frame of internet banner advert)**



### **3.3.4.3 Terms and conditions (T&Cs) for the gambles presented**

Five per cent of the adverts did not require T&Cs as the content only promoted the brand and not a specific gamble (Table 3.9). In the remaining sample, over one-in-ten gambling adverts (11%) did not present any T&Cs (Figure 3.24a). In approximately three-quarters of the adverts (73%), the T&Cs were rated as 'very poor' visibility - less than 10% of available space - while in around one-in-ten (11%) adverts, the T&Cs were rated as 'poor' visibility - less than 15% of available space (Figure 3.24b). In most cases, the T&Cs were presented in small fonts, in neutral colours (e.g. black text on a white background), were positioned outside of the main frame of the advert, presented technical information (e.g. stipulations on withdrawing free bets or bonuses), and were juxtaposed against stimulating advert content.

Few adverts had T&Cs with 'acceptable' (2%), 'good' (3%), or 'very good' visibility (2%) (Table 3.8). In radio adverts, for example, clear narration outlined the T&Cs for approximately 10 seconds (typically a third of the advert). For other forms of advertising, however, comparatively high visibility did not necessarily translate into ease of readability or comprehension. In a print advert for Bet365.com, for example, although the T&Cs occupied around 20% of available space, this contained a great deal of information, in small font, was outside the main advert frame, and was juxtaposed against the rest of the advert (Figure 3.24c). This pattern was also true for most e-mail advertising.

Figure 3.24a: Advert which contains no T&Cs

A. McLean BOOKMAKERS **50/1** WEDNESDAY **ABCD SPECIAL**  
 A. SAMCRO B. PRESENTING PERCY  
 C. ALTIOR D. CAUSE OF CAUSES

The advertisement features the A. McLean Bookmakers logo on the left, a large '50/1' odds display in a green-bordered box, and the text 'WEDNESDAY ABCD SPECIAL' in green and white. Below this, four horse names are listed in a 2x2 grid: A. SAMCRO, B. PRESENTING PERCY, C. ALTIOR, and D. CAUSE OF CAUSES. On the far right, there is a small image of a jockey on a horse.

Figure 3.24b: Advert which has very poor T&Cs (less than 10% of available advertising space)

ROSS COUNTY,  
 RANGERS & HEARTS  
 ALL TO WIN



**11/2\***  
 WAS 4/1

\*Odds subject to change. Max stake applies. Full terms apply.

The advertisement is split into two main sections. The left section has a black background with white and green text: 'ROSS COUNTY, RANGERS & HEARTS ALL TO WIN'. The right section has a green background with white text: '11/2\*' and 'WAS 4/1'. At the bottom, there is a thin white bar containing small text: '\*Odds subject to change. Max stake applies. Full terms apply.' and some faint, illegible text on the right side.



Figure 3.24c: Advert which has T&Cs with acceptable visibility but difficult readability

**bet365.com** UK: 08000322365  

# PRICE PROMISE

WE WILL BE BEST PRICE ON EVERY HORSE RUNNING LIVE ON ITV RACING.

We will match or better the prices of the following Bookmakers: Ladbrokes, William Hill, Paddy Power, Coral, Sky Bet and BoyleSports.

Offer applies from 10am. Does not apply to Enhanced Place Term markets. Other exclusions apply. §

Enjoy gambling responsibly. [BeGambleAware.org](http://BeGambleAware.org) 18+

UP TO £100 IN BET CREDITS FOR NEW CUSTOMERS\*

**ITV RACING 4/1 OFFER**  
Back a winner at 4/1 or more on ANY race broadcast LIVE on ITV Racing and get a risk free bet on the next race shown LIVE on ITV Racing. ‡

Only available to new and eligible customers

**ENHANCED ↑ PLACE TERM MARKETS CHELTENHAM**

2.50	1-2-3-4-5-6
4.50 & 5.30	1-2-3-4-5
1.30 & 4.10	1-2-3-4

Price Promise does not apply to these markets

1/4 ODDS A PLACE ON ALL FESTIVAL RACES

Need Help? Call the National Helpline free on 0808 802 0133. View conditions of all our offers at [www.bet365.com](http://www.bet365.com). \*New customers only. Deposit £5 or more and claim within 30 days of registering to receive a 100% matched amount in Bet Credits up to £100. Bet Credits are released after settlement of qualifying bets (must settle within 30 days of claiming) and are non-withdrawable. Returns exclude Bet Credits stake. NETeller, Skrill and Skrill 1-Tap deposits don't count. Selections settled at odds of less than 1/5. Cashed Out bets and bets placed via our Telephone Betting service don't count towards release of Bet Credits. Other conditions, time limits & exclusions apply. §Offer applies to bets placed on Win and Each-Way Fixed Odds markets only, excluding Each Way Extra where place terms are selected which vary from our standard or enhanced place terms for that race. All other markets are excluded from this offer. Races covered by Price Promise are also available for Best Odds Guaranteed, for new and eligible customers. ‡Only available to new and eligible customers residing in Great Britain and Republic of Ireland. Max risk free bet amount is £50 per customer, per race. Bets must be placed in the usual way and can be paid for from your Withdrawable Balance or Bet Credits. Refunds from risk free bets will be returned to the applicable balance. Offer applies to bets placed on Win and Each-Way Fixed Odds markets and Enhanced Place Terms markets only, excluding Each Way Extra where place terms are selected which vary from our standard or enhanced place terms for that race. All other-markets are excluded from this offer. Bets placed using our Telephone Betting service will not qualify for this offer. Cash Out and Edit Bet restrictions, event selection & other conditions apply.

### 3.3.5 Information Presented About the Gamble and Associated Offers

#### 3.3.5.1 Reference to a specific bet

Almost three-quarters of adverts (72%) referred to a specific gamble (Figure 3.25) (Table 3.10). Examples included, but were not limited to, football and horse racing accumulators,



entry into a single or subscription lottery, card game tournaments, predicting the results of football matches (e.g. team win or draw), horses to win or place in a race, football pools, spins on an online game, events in a football match (e.g. both teams to score), online bingo, and specialist bets (e.g. Betfred's "Lucky 15" bet is a combination of 4 singles, 6 doubles, 4 trebles and a four-fold accumulator).

**Table 3.10: Codebook section five: Information about the bet or gamble**

Information about the gamble	<i>n</i>	%
Specific bet or gamble	216	72
Specific odds	117	54 <sup>1</sup>
Suggested stakes or wagers	148	49
New customer offers	72	24
Price offers and bonuses	123	41
Free or matched bets	133	44
Time limited offers	232	77
Minimise risk	80	27
Previous winners or likelihood of winning	22	7
Jackpots or potential prizes	42	14
Volume of information presented		
<i>No form of information</i>	21	7
<i>One form of information</i>	9	3
<i>Two forms of information</i>	23	8
<i>Three forms of information</i>	59	20
<i>Four forms of information</i>	81	27
<i>Five forms of information</i>	54	18
<i>Six forms of information</i>	23	8
<i>Seven forms of information</i>	21	7
<i>Eight forms of information</i>	9	3

Notes:

<sup>1</sup> Percentages are 'valid %' – i.e. based only on the total sample of marketing for which did feature a specific bet or gamble was included (*n* = 216).

**Figure 3.25: Advert promoting a specific bet or gamble**

The advertisement is for a Ladbrokes bet on a Chelsea vs Crystal Palace match. The main offer is 'CHELSEA 23/10' (odds of 23/10) for the bet 'TO WIN & 4 OR MORE GOALS IN THE MATCH' with a 'Max Stake £50'. The ad includes app download instructions for the App Store and Google Play, a responsible gambling message 'WHEN THE FUN STOPS STOP' with the BeGambleAware.org logo, and a disclaimer: 'Price subject to fluctuation. 18+ PLEASE BET RESPONSIBLY begambleaware.org - Need Help? Call the National Gambling Helpline on 0808 802 0133'.

### 3.3.5.2 Reference to specific odds

Of the adverts which referred to a specific gamble, over half (54%) presented odds (Table 3.10). These varied dependent on the nature of the gamble, but included odds on football match results (e.g. “*Man City to win 4-0, 7/1*”) and odds of a horse to win or place in a race (e.g. “*Buveur D’Air to win 4/7*”) (Figure 3.26). Some advertising also referred to instances in which the original odds had been revised (commonly referred to as an ‘odds boost’) to enhance attractiveness and potential returns (e.g. “*Odds boost, was 4/4 now 7/1 Lukaku and Sanchez both to score*”).

Figure 3.26: Advert promoting specific odds

**bet365.com**  
UK: 08000322365

SCOTTISH PREMIERSHIP  
LIVE ON SKY SPORTS MAIN EVENT/SKY SPORTS FOOTBALL, KICK-OFF 19.45

**BORE DRAW MONEY BACK OFFER**  
IF ANY SOCCER MATCH FINISHES 0-0 WE WILL REFUND LOSING PRE-MATCH BETS ON ALL HALF-TIME/FULL-TIME, CORRECT SCORE AND SCORECAST MARKETS. †  
Only available to new and eligible customers

**UP TO £100 IN BET CREDITS FOR NEW CUSTOMERS\***

BET ON OVER 100 PRE-MATCH & 70 IN-PLAY MARKETS

BOTH TEAMS TO SCORE		TOTAL GOALS		RESULT/BOTH TEAMS TO SCORE	
Yes	11/10	Under 2.5	8/13	Hibernian & Yes	15/4
No	4/6	Over 2.5	5/4	Hibernian & No	7/4
CORNERS		HALF-TIME RESULT		Hearts & Yes	9/1
Over 10	11/10	Hibernian	6/4	Hearts & No	11/2
Under 10	Evs	Hearts	9/2	Draw & Yes	9/2
Exactly 10	7/1	Draw	21/20	Draw & No	7/1

Enjoy gambling responsibly. BeGambleAware.org 18+

Need Help? Call the National Helpline free on 0808 802 0133. View conditions of all our offers at www.bet365.com. \*New customers only. Deposit £5 or more and claim within 30 days of registering to receive a 100% matched amount in Bet Credits up to £100. Bet Credits are released after settlement of qualifying bets (settle within 30 days of claiming) and are non-withdrawable. Returns exclude Bet Credits stake. Neteller, Skrill and Skrill 1-Tier deposits don't count. Selections settled at odds of less than 1/5. Cash Out bets and bets placed via our Telephone Betting service don't count towards release of Bet Credits. Other conditions, limits & exclusions apply. †Only available to new and eligible customers. See a full list of offers available to you by logging in and selecting the Offers section on mobile or the Promotions section on desktop. Offer is available pre-match on every Soccer game for Half-Time/Full-Time, all Correct Score & all Scorecast markets. Refund will be given if the game finishes 0-0. Bets can be paid for from your Withdrawable Balance or Bet Credits. Any refunds will be returned to the applicable balance. In multiple bets the selection will be treated as a non-runner. Cash Out and Edit Bet restrictions & other conditions apply. All prices subject to fluctuation.

### 3.3.5.3 Suggested stakes or wagers

Approximately half of adverts (49%) referred to, or implied, an amount to wager (Table 3.10). Some suggested a specified amount to gamble, with examples including “*Deposit £10*”, “*Native River to win 6/1, £10 returns £70*”, and “*It’s just £1 to play for your chance to win our £25,000 jackpot*” (Figure 3.27). Others implied either a minimum bet amount or deposit (e.g. “*20p minimum unit stake*”, “*Min deposit spend £10 to receive £10 slots bonus*”, “*Minimum deposit £5*”) or maximum limits for the gamble (e.g. “*Maximum stake £20*”, “*Maximum stake £200*”, and “*for up to £250*”).

Figure 3.27: Advert promoting or suggesting a specific wager

CHELTENHAM\_FESTIVAL

# Get a £10 free bet on Day One

Simply stake £20 online or with PLUS in shop on the Imperial Cup

*William* HILL

WHEN THE **FUN** STOPS **STOP** BeGambleAware.org 18+

Min. stake of £/€20 on the Imperial Cup. Bet must be placed at odds of 1/2 (0.5) or greater. Win & Each Way Singles Only. Racecard Markets only. Bets placed with a free bet will not qualify to receive a Free Bet. If you Cash In Your Bet you will not qualify to receive a Free Bet. Qualifying bets must be placed between 5.30pm on Fri 9<sup>th</sup> March and the start of the Imperial Cup on Sat 10<sup>th</sup> March to qualify. Receive a free bet of £/€10 to use on any race on Tues 13<sup>th</sup> March at Cheltenham Festival. Free Bet is non-refundable and

(emphasis in red box added by authors)

#### 3.3.5.4 New customer offers

Approximately a quarter of adverts (24%) referred to an offer only available to new customers (i.e. an incentive to sign up) (Table 3.10). These offers were of three types. The first offered new customers exclusive or enhanced odds, for example “*New customer offer: Un de Sceaux 66/1 to win the RyanAir Chase*” and “*New customer offer: Man Utd v Liverpool. A goal to be scored 25/1*” (Figure 3.28). The second provided free or matched bets to customers, for example “*Up to £100 in bet credits for new customers*” and “*Deposit £20, play with £70. £20 sports and £30 casino bonus*”. The third type of new customer offer reduced the risk of any initial gamble for new customers, for example “*New accounts: money back (up to £30) as a bonus if your first bet loses*” and “*New customer offer: £10 risk free bet. Money back in cash if it doesn’t win*”.



Figure 3.28: Advert promoting a new customer offer

*Ladbrokes*

**CHELTENHAM FESTIVAL**

SUPREME NOVICES' HURDLE

**APPLE'S SHAKIRA  
TO WIN 50/1**

**#BoostYourCheltenham**

£1 bet available to new Online customers using promo code: CHELT18. Additional winnings paid in free bets, plus a £5 free bet, should your bet lose. Min deposit £5.



**NEW CUSTOMER OFFER**

DOWNLOAD THE APP NOW

Download on the App Store

GET IT ON Google Play

WHEN THE **FUN** STOPS **STOP**

BeGambleAware.org

18+

New Customer Offer: One bet available to new Online & Mobile customers from 3.30pm 15/03/18 until race off. Winnings credited a free bets within 24 hours of result. Singles only. If your bet loses, a £5 free bet will be credited to your account within 24 hours of settlement. Free bets must be used in their entirety and are valid for 4 days. Stake not returned on winning free bets. Full terms at ladbrokes.com. 18+ PLEASE BET RESPONSIBLY begambleaware.org - Need Help? Call the National Gambling Helpline on 0800 802 0133

### 3.3.5.5 Price offers and bonuses for all customers

Two-fifths of adverts (41%) referred to a price offer or bonus that was applicable to all customers (Table 3.10). Many of these references promoted enhanced odds or suggested that the chances of winning had – at least partly – been extended. Examples included “*Treble the odds for one winner on a Lucky 15*”, “*Odds boost. Was 8/1, now 12/1, Salah and Sanchez both to score*”, and “*We’re paying 4 places on the Gold Cup instead of the usual 3, 1/5 odds*” (Figure 3.29). Another example of price offers and bonuses was promoting enhanced winnings on particular bets, such as “*Double your winnings if your team wins both halves*”, “*Triumph Hurdle: Double your winnings if your horse wins*”, and “*£52,483 bonus fund rollover*”.

**Figure 3.29: Advert promoting a price offer or bonus, in this instance an odds boost**



### 3.3.5.6 Free or matched bets

Almost half of adverts (44%) referred to a free or matched bet (Table 3.10). These were of three main types. The first type offered free or matched bets as an incentive to play or to register an account: for example, “*£30 free bet when you register today*” and “*Deposit £10, play with £40, get £20 bingo bonus and £10 games bonus*” (Figure 3.30). The second type suggested that winnings from other bonuses could be paid as a free bet: for example, “*Acca boost. Winnings boosted by 10% on 4+ fold accumulators, paid as a free bet up to £100*” and “*Enhanced winnings paid in free bets*”. The third type presented free or matched bets as an opportunity to minimise risk: for example, “*5 team acca insurance. If one team lets you down in your acca of 5 teams or more get your money back as a free bet*”.

**Figure 3.30: Advert promoting a free or matched bet**



**Mirror**  
Mbingo

Get £20  
Bingo Bonus  
and £10 Games  
Bonus

18+

gambleaware.co.uk

Promotional T&Cs and  
wagering apply

### 3.3.5.7 Time limited gambles, offers, and bonuses

Over three-quarters of adverts (77%) referred to a time limited gamble or offer (Table 3.10). These can be seen as creating a sense of immediacy and urgency, and encouraging instant action by the consumer. In most instances, the gamble or bonus was specific to a sporting event taking place imminently. Examples included “*Bet on Cheltenham today and get up to £50 as a free matched bet*”, “*11/2 Monday night’s 30 minute double. Man City and W. Bremen to lead their matches at 30 minutes*” and “*Enhanced place term markets, 3.35 Uttoxeter, 1/4 odds*”. Even where the advertising did not relate to a specific sporting event, general price offers and bonuses were also suggested to be time-limited. Examples included “*£30 free bet when you register today*” and “*Between 9 and 11 every night our unmissable bonus game is guaranteed to trigger*”. For lotteries, adverts suggested that playing and winning opportunities were linked to specific days: “*This Tuesday there is a £54 million jackpot*” and “*Jennifer is back with you on Monday so don’t forget to go online...*” (Figure 3.31).

Figure 3.31: Advert promoting time limited offer or gamble

**NO ROLLOVERS**  
only playing postcodes are entered!

Join in at [postcodelottery.co.uk/tb9](http://postcodelottery.co.uk/tb9)  
or call **0808 178 9088**

**PEOPLE'S POSTCODE LOTTERY** Prizes announced every day for £10 a month

Sign up by 22 March

Guaranteed winners every day!

- ✓ Prizes announced every day for **£10 a month**
- ✓ **£11 million** to be won in April
- ✓ A minimum of **32%** of your subscription goes directly to charity

MONTHLY	MONTHLY	MONTHLY
<b>£3 MILLION</b> shared by one lucky postcode area in the Postcode Millions Prize	<b>+ £5,000 HOLIDAY VOUCHERS</b> <b>+ £2,000 SPENDING MONEY</b> for every ticket in the winning postcode	<b>+ £25,000</b> for every ticket in 1 winning postcode <b>+ BMW 1 SERIES</b> for one lucky winner

SATURDAY	SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
<b>£30,000</b> for every ticket in 1 winning postcode	<b>£30,000</b> for every ticket in 1 winning postcode	<b>£1,000</b> for every ticket in 10 winning postcodes	<b>£1,000</b> for every ticket in 10 winning postcodes	<b>£1,000</b> for every ticket in 10 winning postcodes	<b>£1,000</b> for every ticket in 10 winning postcodes	<b>£1,000</b> for every ticket in 10 winning postcodes

Plus thousands of £10 and £15 cash prizes to be won every weekend!

Call free **0808 178 9088** or visit [postcodelottery.co.uk/tb9](http://postcodelottery.co.uk/tb9)

**PEOPLE'S POSTCODE LOTTERY**

**NO ROLLOVERS!**  
Only playing postcodes are entered

16 BeGambleAware People's Postcode Lottery manages multiple society lotteries promoted by different charities. For details on each week's society lottery visit [www.postcodelottery.co.uk/good-causes/how-to-play](http://www.postcodelottery.co.uk/good-causes/how-to-play). Players must be 16 years or over. Only available to play with postcodes in England, Scotland and Wales. Not available in NI. Conditions apply. See [www.postcodelottery.co.uk/210](http://www.postcodelottery.co.uk/210) for 10 draw schedule monthly in advance. 30% minimum of 32% goes directly to charities. For a full list of prizes visit [www.postcodelottery.co.uk/prizes](http://www.postcodelottery.co.uk/prizes). Maximum ticket price is 10% of prize proceeds up to £400,000. Postcode Lottery Limited is incorporated in England and Wales and licensed and regulated by the Gambling Commission under licenses 090-000259-96-002710 and 090-000025-96-002573. Registered office: Postcode Lottery Ltd, Broomfield House, 66-68, Tabernacls Street, London, EC2A 4HT. Company reg. no. 04053732. VAT reg. no. 9485376630.

### 3.3.5.8 Minimise risk

A quarter of adverts (27%) referred to a means of minimising risk (Table 3.10). In most instances, customers were reassured that they could get their money back as free bets if their bet was unsuccessful (Figure 3.32). Examples included “Money back as a free bet if you lose on the first and last race” and “Money back as a free bet if your horse falls in any Sandown race today”. Other examples included suggestions that a consumer could cash-out (e.g. “CashOut now available Betfred.com”) or suggestions an individual could play with free bets without having to deposit any money.



**Figure 3.32: Advert promoting opportunity to minimise risk, in this instance money back as a free bet**

The advertisement is for Paddy Power's Champions League match on 7th March. It features a dark green background with a soccer field scene. Three players are shown: one in a light blue kit (Manchester City), one in a white kit with 'AIA' on the front (Arsenal), and one in a light blue kit (Manchester City). A circular badge in the top center reads 'HOME OF THE MONEY BACK SPECIAL'. The main text in large yellow and white letters says 'MONEY BACK AS A FREE BET IF AN ENGLISH TEAM WINS THE MATCH YOU BET ON'. Below this, smaller text states 'MAX FREE BET £10 | NEW AND EXISTING CUSTOMERS | SELECTED MARKETS ONLY'. In the top right corner, a yellow box says 'DOWNLOAD OUR NEW FASTEST EVER APP NOW'. The Paddy Power logo is in the bottom right. At the bottom center, it says 'WHEN THE FUN STOPS STOP'. In the bottom right corner, there is a 'BeGambleAware.org' logo.

Place a pre match single bet of up to £10 on any of matches involving an English Club in the Champions League tonight, 7th March and if it loses, get your stake back as a free bet if an English team wins the match you bet on. Applies to your first bet on the correct score, first goalscorer, last goalscorer, anytime goalscorer, and WhatOddsPaddy markets

### 3.3.5.9 Previous winners or likelihood of winning

Less than one-in-ten adverts (7%) referred to previous winners or the likelihood of winning<sup>9</sup>. These references mostly appeared in adverts for lotteries, including references to areas that were collective winners (e.g. “Sunday, £30,000 for every ticket in this winning postcode...”) or individuals receiving their jackpot (Figure 3.33). Some adverts also included written testimonials from winners; for example, an advert for the Football Pools included the statement “I don’t really know what to say....I can’t wait to tell my family. There’s lots of us and they’ll be over the moon - £51,760 winner from Manchester”.

<sup>9</sup> This item only focused on examples of real-world winners (or least implied winners) and not actors in fictional scenarios. For example, an individual celebrating winning a bet during a fictional narrative in a television advert would not have been coded. Lottery winners receiving their cheque, however, would have been coded.



Figure 3.33: Advert promoting previous winners and also referencing potential jackpots

**Are you playing?**

**BE ON A WINNING STREET**  
Call free 0800 368 4857 or visit [postcodelottery.co.uk/reg2](http://postcodelottery.co.uk/reg2)

**PEOPLE'S POSTCODE LOTTERY**

**Guaranteed winners every day!**

**MONTHLY**  
**£3 MILLION**  
shared by one lucky postcode area in the Postcode Millions Prize

**MONTHLY**  
**£5,000 HOLIDAY VOUCHERS**  
**+ £2,000 SPENDING MONEY**  
for every ticket in the winning postcode

**MONTHLY**  
**£25,000** for every ticket in 1 winning postcode  
**+ BMW 1 SERIES**  
for one lucky winner

✓ Only players' postcodes are entered into draws, so prizes are always won  
✓ £10 for 10 draws paid monthly in advance  
✓ This enters you for every prize, announced every day of the month

<b>SATURDAY</b> <b>£30,000</b> for every ticket in 1 winning postcode £100... for every ticket in 50 winning postcodes £50... for every ticket in 50 winning postcodes	<b>SUNDAY</b> <b>£30,000</b> for every ticket in 1 winning postcode £20 for every ticket in 500 winning postcodes £10 for every ticket in 20,000 winning postcodes	<b>MONDAY</b> <b>£1,000</b> for every ticket in 5 winning postcodes	<b>TUESDAY</b> <b>£1,000</b> for every ticket in 5 winning postcodes	<b>WEDNESDAY</b> <b>£1,000</b> for every ticket in 5 winning postcodes	<b>THURSDAY</b> <b>£1,000</b> for every ticket in 5 winning postcodes	<b>FRIDAY</b> <b>£1,000</b> for every ticket in 5 winning postcodes
--	--	---	--	--	---	---

Players must be 16 years or over.  
People's Postcode Lottery manages multiple society lotteries promoted by different charities

Call free 0800 368 4857 or visit [postcodelottery.co.uk/reg2](http://postcodelottery.co.uk/reg2)

**PEOPLE'S POSTCODE LOTTERY**

16 gambleaware.co.uk People's Postcode Lottery manages multiple society lotteries promoted by different charities. For details on each week's society lottery visit: [www.postcodelottery.co.uk/quick-draws](http://www.postcodelottery.co.uk/quick-draws). Players must be 16 years or over. Only available to play with postcodes in England, Scotland and Wales. Not available in NI. Conditions apply. See [www.postcodelottery.co.uk](http://www.postcodelottery.co.uk) for 10 draws paid monthly in advance, a minimum of 30% goes directly to charities. For a full list of prizes visit [www.postcodelottery.co.uk/prizes](http://www.postcodelottery.co.uk/prizes). Maximum ticket price is 10% of draw proceeds up to £400,000. Postcode Lottery Limited is incorporated in England and Wales and is licensed and regulated by the Gambling Commission under licences 000-000829-A-102511-013 and 000-000829-B-102513-012. Registered office: Postcode Lottery Ltd, The Field House, 69/85 Tabernacle Street, London, EC2A 4BR. Company reg. no. 04862732. VAT reg. no. 848 3165 07.

### 3.3.5.10 Jackpots of potential prizes

Over one-in-ten adverts (14%) referred to the jackpot or prizes that could be won (Table 3.10). In most instances, advertising referred to the total monetary jackpot. Examples included “Just imagine winning your share of a jackpot worth up to £12 million”, “ToteJackpot: £287,447. Massive rollover”, and “£30,000 for every ticket in this winning postcode” (Figure 3.33).

### 3.3.5.11 Total volume of information presented about the gamble and offers

To understand the total volume of information presented about the gamble, and any offers or bonuses, a composite score was calculated for each advert across the ten forms of information (Table 3.10). On average, gambling advertising included 3.94 pieces of information ( $SD =$

1.87) (range: 0 – 8). Most advertising (27%) contained four pieces of information about the gamble and offers. Nine adverts contained up to eight forms of information about the gamble and any price offers or bonuses (Figure 3.34b). Only 7% of adverts contained no information about a gamble (Figure 3.34a).

**Figure 3.34a: Advert promoting no information about a gamble**

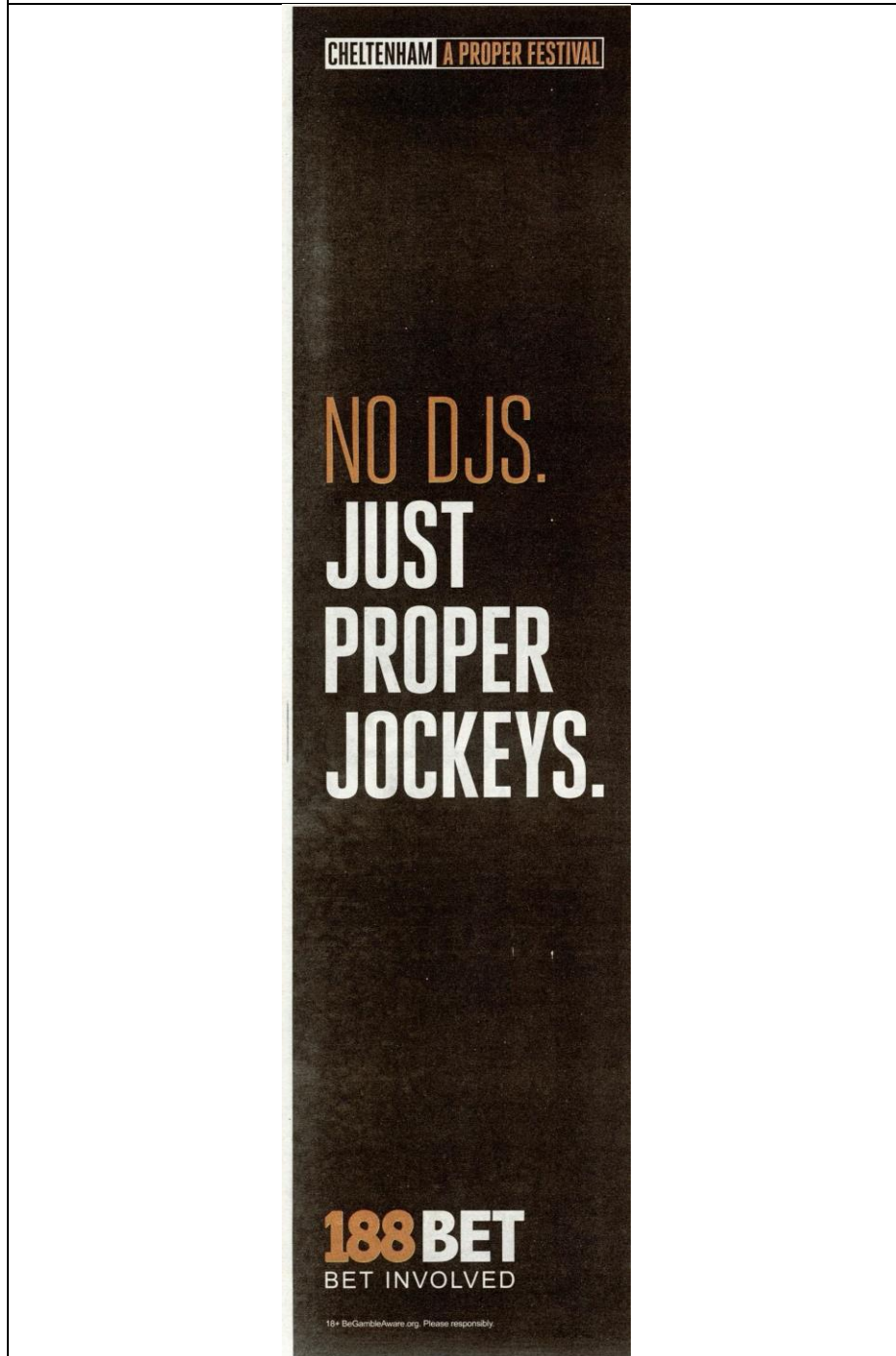




Figure 3.34b: Advert promoting multiple information about a gamble

**bet365.com**  
UK: 08000322365

**PRICE PROMISE**  
WE WILL BE BEST PRICE ON EVERY HORSE RUNNING LIVE ON ITV RACING.  
We will match or better the prices of the following Bookmakers:  
Ladbrokes, William Hill, Paddy Power, Coral, Sky Bet and BoyleSports.  
Offer applies from 10am. Does not apply to Enhanced Place Term markets. Other exclusions apply.<sup>§</sup>

**UP TO £100 IN BET CREDITS FOR NEW CUSTOMERS\***

ITV RACING 4/1 OFFER  
Back a winner at 4/1 or more on ANY RACE broadcast LIVE on ITV Racing and get a risk free bet on the next race shown LIVE on ITV Racing.<sup>†</sup>  
Only available to new and eligible customers.

ENHANCED ↑ PLACE TERM MARKETS  
CHELTENHAM  
2.50 1-2-3-4-5-6  
4.50 & 5.30 1-2-3-4-5  
1.30 & 4.10 1-2-3-4  
Price Promise does not apply to these markets.

1/4 ODDS A PLACE ON ALL FESTIVAL RACES

Enjoy gambling responsibly. BeGambleAware.org 18+

Need Help? Call the National Helpline free on 0808 802 0133. View conditions of all our offers at www.bet365.com. \*New customers only. Deposit £5 or more and claim within 30 days of registering to receive a 100% matched amount in Bet Credits up to £100. Bet Credits are released after settlement of qualifying bets (must settle within 30 days of claiming) and are non-withdrawable. Returns exclude Bet Credits stake. NETeller, Skrill and Skrill 1-Top deposits don't count. Selections settled at odds of less than 1/5, Cash Out bets and bets placed via our Telephone Betting service don't count towards release of Bet Credits. Other conditions, time limits & exclusions apply. †Offer applies to bets placed on Win and Each-Way Fixed Odds markets only, excluding Each Way Extra where place terms are selected which vary from our standard or enhanced place terms for that race. All other markets excluded from this offer. Races covered by Price Promise are also available for Best Odds Guaranteed, for new and eligible customers. ‡Only available to new and eligible customers residing in Great Britain and Republic of Ireland. Max risk free bet amount is £50 per customer, per race. Bets must be placed in the usual way and can be paid for from your Withdrawable Balance or Bet Credits. Refunds from risk free bets will be returned to the applicable balance. Offer applies to bets placed on Win and Each-Way Fixed Odds markets and Enhanced Place Terms markets only, excluding Each Way where place terms are selected which vary from our standard or enhanced place terms for that race. All other markets are excluded from this offer. Bets placed using our Telephone Betting service will not qualify for this offer. Cash Out and Edit Bet restrictions, event selection & other conditions apply.

### 3.3.6 Messages Suggested about Gambling Behaviour and Outcomes

#### 3.3.6.1 Socially irresponsible or excessive gambling

Four adverts (1%) plausibly invoked some degree of socially irresponsible or excessive gambling (Table 3.11). In two adverts, both from The Gentleman Bookmaker, the content implied large wagers on a horse race; one of these two adverts claimed “*We’re offering enhanced odds on GetABird in tomorrow’s Supreme and we’ll lay it to a sizable stake*”. An advertorial by A McLean bookmakers used the phrase “*It’s win or burst [sic] for Rangers*” which may be considered indicative of significant risks or endorsing an all-or-nothing approach. The final advert, from StarWins.co.uk, suggested that sometimes a player had no option but to go all out: “*...when a similarly stacked opponent moves all-in on you on the flop<sup>10</sup> your options are polarised to call or fold. There is nothing you can do to counter the all in.*” The same advert then also used phrases such as “*do you have the balls to call with your good hands?*” and “*Big calls take big balls*” (Figure 3.35).

<sup>10</sup> In card games (e.g. poker) ‘the flop’ refers to the action of dealing the first three face-up cards and also refers to the cards themselves (i.e. ‘there were two aces and a queen on the flop’).

**Table 3.11: Codebook section six: Messages suggested about gambling behaviour and outcomes<sup>1</sup>**

<b>Messages</b>	<i>n</i>	%
Socially irresponsible or excessive gambling	4	1
Exploit susceptibilities	66	22
Escape problems	2	<1
Financial solution or alternative employment	3	1
Indispensable or taking priority	8	3
Enhance personal qualities	34	11
Peer pressure or fear or missing out	16	5
Sexuality or attractiveness	3	1
Personal and social success	28	9
Tough or masculine behaviour	14	5
Isolated activity	0	0
Appeal to children or young persons	32	11
Features those under 25 years old	23	8
Impressions of luck	4	12
Criminal or anti-social behaviour	1	<1
Linked to work	0	0
Glamorous	12	4
Normal or regular behaviour	98	33
Time or event specific reference	239	80

<sup>1</sup> Items are partly based on those included in the ASA Non-broadcast code of conduct for gambling marketing and advertising [1].

**Figure 3.35: Advert plausibly containing social irresponsible content**





**NORTH & SOUTH**

Apparently, it would take you 138 hours to walk the 417 miles that separate the two cities offering up Grosvenor '25-25 Series' today. Fortunately, no-one is asking you to do that! Simply pick from the Edinburgh or Portsmouth as your destination of choice and go play! £225 will buy you a seat into one of the three starting flights, 25,000 in poker chips to play with, and a £25,000 guaranteed prize pool to rip YOUR winner's chunk out of! (See GUKPT.com)

**BIG CALLS...**

In a NLH tournament, when a similarly stacked opponent moves all-in on you on the flop, your options are polarised to call or fold. There is nothing you can do to counter the all-in, so your decision-making must focus on whether your opponent is strong or weak. The flop shove is often a sign of weakness, a desperate move to try to 'force' you to fold through piling on maximum pressure...

**...TAKE BIG BALLS**

Your challenge is to figure out whether your opponent is bluffing outright, semi-bluffing with a draw, protecting top pair, or making out like a wild man with a monster hand. If your read of the players suggests a desperate bluff, do you have the balls to call with your good hands? Remember, even if you catch them bluffing, you can still get savaged if they hit good cards on the turn or river!

  
 Marbella Slim





**FREE BET  
FREEROLLS  
EVERY THURSDAY!**



**STAR WINNER**

**LUCK BE A LADY**

International Women's Day celebrates the courage and strength of women everywhere, and we have some super heroines amongst our stable of themed slots at StarWins.com. Come and play 'Cleopatra Plus', 'Amazon Queen', 'Fire Queen', or 'Miss White' for starters!



**WWW.STARWINS.CO.UK**



### 3.3.6.2 Exploit susceptibilities of young and vulnerable groups

One fifth of adverts (22%) plausibly exploited<sup>11</sup> the susceptibilities, aspirations, credulities, inexperience or lack of knowledge of children, young persons, or other vulnerable groups (e.g. problem gamblers) (Table 3.11). Four themes were identified. The first implied limited risk by, for example, describing bets as “*risk free*”, suggesting that gambling was possible without betting money, or promoting the ability to reclaim losses (Figure 3.36). The second theme was overly complicated or potentially misleading presentation of gambles and offers. Examples included using acronyms or technical terms without clear explanation. Most commonly, adverts in this category promoted eye-catching bets or offers but then outlined extensive criteria concerning eligibility to play or withdraw money in extensive T&Cs. For example, print adverts for Bet365.com promoted “£100 in bet credits for new customers” and an e-mail advert for Casino of Dreams promoted a “£1,000 welcome bonus + 50 free spins on *Beautiful Bones*”, yet both had extensive stipulations regarding eligibility or restrictions. The third theme was inflated suggestions of winning, for example implying that someone had already won (e.g. “*We guarantee you £10,000*”). The fourth theme suggested that gambling was simple or that the company provided a safeguard. For example, a print advert for William Hill suggested that gambling “*Couldn’t be easier with the friendly William Hill team members on hand to help*” while a print advert for Paddy Power similarly promised “*Hand over the voucher and betting slip to Paddy’s friendly shop staff*”. An e-mail advert for Coral also described the ability to access a £50 casino bonus as “*easy as 1-2-3*”.

**Figure 3.36: Advert plausibly exploiting susceptibilities and vulnerabilities by suggesting risk free gambling**



### 3.3.6.3 Escape from problems

Two adverts plausibly suggested that gambling could provide an escape from problems (Table 3.11). In a radio advert for Britain’s Got Talent games, the narrator takes part in a fictional audition for the television show on which the game is based. The narrator performs a beatbox act that is not well received and the contestant is ‘buzzed off’. The narrator then says “*Suit yourself, But I could still win big and so could you at Britain’s Got Talent Games...*”. This could imply that although the contestant was rejected for their limited talent, gambling still provided an opportunity to be successful. The second example, a television advert for Euromillions that was set by the poolside of a mansion, depicts an individual walking into the glass door. The advertising tagline “*Nicer problems to have*” implies that their previous win on the EuroMillions had helped to ease all other problems (Figure 3.37).

<sup>11</sup> The term ‘exploited’ is from the Committee of Advertising Practitioners self-regulations, which part of our methods were constructed upon. There are, however, limitations with this term. It potentially implies that the marketing had a deliberate intention or motivation to exploit vulnerable groups. It is, however, plausible that such influence can happen incidentally, without prior motive. In this study, it was not our intention to imply that gambling operators were designing deliberately exploitive marketing. To clarify, we were looking for marketing that young or vulnerable groups (of whom have different susceptibilities, aspirations, credulity or lack of knowledge/experience) may have reacted differently or, or have enhanced impact, compared to the adult population.

**Figure 3.37: Advert plausibly suggesting gambling can provide an escape from problems**




#### **3.3.6.4 Financial solution or alternative employment**


Three adverts (1%) plausibly portrayed gambling as a solution to financial concerns or a source of alternative employment (Table 3.11). One print advert, for StarWins.co.uk, described the gamble as “*potentially spinning you into a fortune*”, which may suggest no need to work if this happened. A door-drop for The Football Pools included a testimonial from a previous winner that said “*This couldn’t have happened at a better time, I’m retiring next week*”, with the implication being the jackpot had helped ease their financial worries about retiring (Figure 3.38). The third example, a television advert for The EuroMillions, shows two characters relaxing on sun loungers by the poolside of a mansion. The narrative and tagline of “*Nicer problems to have*” implies that the financial security permitted by a win means they can spend their days relaxing poolside in the sun (Figure 3.37).

Figure 3.38: Advert plausibly suggesting gambling can provide financial solution


**PLAY NOW FOR EVEN MORE CHANCES TO WIN!**




**East Sussex Man  
won £98,356**  
*"This couldn't have happened at a better time, I'm retiring next week!"*




**Hillington Lady  
won £45,076**  
*"What an amazing thing to happen. I just can't believe it!"*



**Wiltshire man  
won £61,945**  
*"It has been a family tradition to play the pools. I have always enjoyed playing and this win has come at the perfect time."*



**Pools Privileges winner Mr Cook  
won a £300 Lifestyle voucher**  
*"How wonderful, I can't wait to treat myself!"*



**Mr Cox won our  
Car Prize Draw!**  
*"I am simply amazed, thank you so much!"*

(emphasis in red box added by authors)

### 3.3.6.5 Indispensable or taking priority

Eight adverts (3%) plausibly implied that gambling was indispensable or took priority (Table 3.11). Four adverts for SkyBet used the tagline *"Move over football, Cheltenham coming through"* which may imply that gambling on horse racing at the Cheltenham Festival should take priority over usual gambling on a football match (Figure 3.39). Other examples included *"Follow @totepool racing for those all-important races and rollovers"* and Coral adverts suggesting *"Don't miss a minute..."* and *"Why request a bet when you can get your price instantly"*.



**Figure 3.39: Advert plausibly suggesting indispensable or taking priority**

first race special

**MONEY BACK AS A FREE BET\* IF YOU LOSE**

1.30 - EVERY DAY CHELTENHAM

NEW & EXISTING CUSTOMERS  
\*MAX STAKE £20/€20

**MOVE OVER FOOTBALL, CHELTENHAM COMING THROUGH**

**sky bet**  
BETTING, BETTER

DOWNLOAD THE APP NOW  
GET IT ON Google Play | Download on the App Store

WHEN THE **FUN** STOPS **STOP** BeGambleAware.org 18+

\*Customers will be credited with their refund as a free bet within 24 hours of the race finishing. Free bet stake not returned. Eligibility restrictions apply. Applies to bets placed after 8am 23/02/2018. Offer applies to first bet only. Max free bet refund £20/€20. 21 day free bet expiry. 18+ only. T&Cs apply. [BeGambleAware.org](http://BeGambleAware.org). Visit [skybet.com](http://skybet.com) for more information.

(emphasis in red box added by authors)

### 3.3.6.6 Enhance personal qualities

Around one-in-ten adverts (11%) plausibly suggested that gambling could enhance personal qualities, such as self-image or self-esteem, or was a way to gain control, superiority, recognition or admiration (Table 3.11). In most cases, it was suggested that the gamble provided more control over the outcome or enhanced power. Examples included phrases such as William Hill's "*More boosts, more control, more to celebrate*", Coral's "*Imagine if you had the power to call the shots*", and Ladbroke's "*The power to boost your odds instantly*" (Figure 3.40). Other examples included suggestions of enhanced status (e.g. "*Together we can be the best*"), suggestions of philanthropic respect (e.g. "*Over £97m raised for local good causes thanks to your help*"), and general descriptors of enhanced personal qualities (e.g. "*We have some super heroines amongst our stable of themed slots*" and "*The Gentleman's Bookmaker*").

**Figure 3.40: Frames from television advert plausibly suggesting enhanced personal qualities, particularly control and superiority**

**More Boosts**

Highly: Please see singles placed after 17:30 previous day. Race/Winner market only £100 max bet per 4 day event. Free bet restrictions apply. In shop: free bet must be claimed within 4 days and used the same day. Min SP bets at SP will qualify. Bet Boost: Max stake £200. App and mobile web only. T&Cs apply. Enhanced Odds: Stake limits apply. Player restrictions & T&Cs apply.

**More Control**

Highly: Please see singles placed after 17:30 previous day. Race/Winner market only £100 max bet per 4 day event. Free bet restrictions apply. In shop: free bet must be claimed within 4 days and used the same day. Min SP bets at SP will qualify. Bet Boost: Max stake £200. App and mobile web only. T&Cs apply. Enhanced Odds: Stake limits apply. Player restrictions & T&Cs apply.

**More to Celebrate**

Highly: Please see singles placed after 17:30 previous day. Race/Winner market only £100 max bet per 4 day event. Free bet restrictions apply. In shop: free bet must be claimed within 4 days and used the same day. Min SP bets at SP will qualify. Bet Boost: Max stake £200. App and mobile web only. T&Cs apply. Enhanced Odds: Stake limits apply. Player restrictions & T&Cs apply.

**William HILL**

**THIS IS MORE**

Cheltenham 2018

BT

WH

WH

WHEN THE **FUN** STOPS **STOP**

BeGambleAware



### 3.3.6.7 Peer pressure or fear of missing out

Sixteen adverts (5%) plausibly implied peer pressure to gamble or evoked a fear of missing out by not gambling (Table 3.11). For example, an advert for The People's Postcode Lottery claimed that "Over half of the postcodes in Great Britain are playing! Your Neighbours could be playing already. If your postcode is a winner, make sure we don't have to pass your door. Join in and start playing" (Figure 3.41). A television advert for BetFair implied a fear of missing out by claiming "If you had bet on all winners so far this week at Cheltenham you'd have won bigger with BetFair" while Paddy Power achieved a similar effect with a print advert which claimed "Yesterday we refunded all losers on three races when the favourite won. That's why it pays to bet with Paddy Power". Examples of language from other adverts included "When it's gone, it's gone", "Don't miss out", "Everyone is a member", "Don't miss your opportunity to play", "There is only one place to be" and "Unmissable bonus games".

Figure 3.41: Advert which plausibly suggests peer pressure or fear of missing out

Return address: Unit 9, Block 12, Bleasdale Court, Clydebank G81 2LE

**BE ON A WINNING STREET**

Dear Gloria,  
Over half of the postcodes in Great Britain are now playing!  
Your neighbours could be playing already. If your postcode is a winner,  
make sure we don't have to pass your door. Join in and start playing!

- ✓ Only players' postcodes are entered into draws, so prizes are always won
- ✓ £10 for 10 draws paid monthly in advance
- ✓ This enters you for every prize, announced every day

**MONTHLY**  
**£3 MILLION**  
shared by one lucky postcode area in the Postcode Millions Prize

**MONTHLY**  
**£25,000**  
for every ticket in 1 winning postcode  
**+ BMW 1 SERIES**  
for one lucky winner

**MONTHLY**  
**£5,000** HOLIDAY VOUCHERS  
**+ £2,000** SPENDING MONEY  
for every ticket in the winning postcode

**SATURDAY**  
**£30,000**  
for every ticket in 1 winning postcode  
£100 for every ticket in 50 winning postcodes  
£50 for every ticket in 50 winning postcodes

**SUNDAY**  
**£30,000**  
for every ticket in 1 winning postcode  
£20 for every ticket in 500 winning postcodes  
£10 for every ticket in 20,000 winning postcodes

**MONDAY - FRIDAY**  
**£1,000**  
for every ticket in 5 winning postcodes every day

Players must be 16 years or over. People's Postcode Lottery manages multiple society lotteries promoted by different charities.

Call free **0800 368 3003** or visit **postcode lottery.co.uk**

**PEOPLE'S POSTCODE LOTTERY**

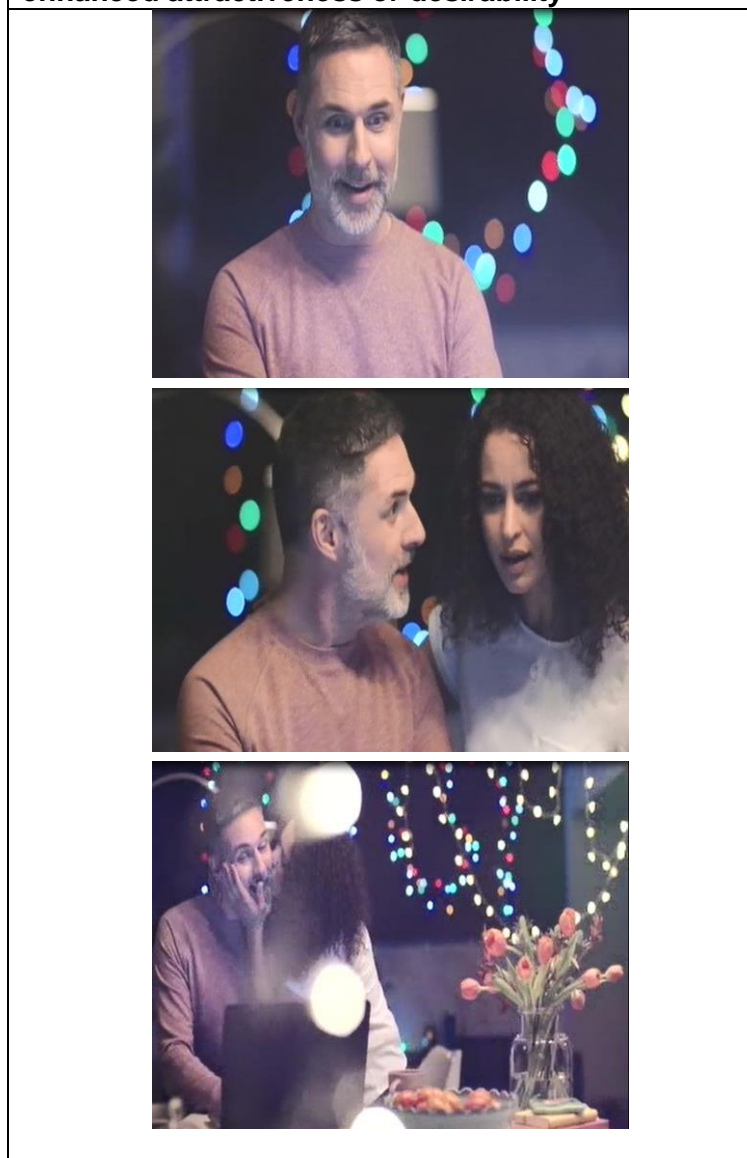
16 People's Postcode Lottery manages multiple society lotteries promoted by different charities. For details on each week's society lottery visit: www.postcode lottery.co.uk/good-causes/draw-calendar. Players must be 16 years or over. Only available to play with postcodes in England, Scotland and Wales. Not available in NI. Conditions apply. See www.postcode lottery.co.uk £10 for 10 draws paid monthly in advance, a minimum of 30% goes directly to charities. For a full list of prizes visit www.postcode lottery.co.uk/prizes. Maximum ticket price is 10% of draw proceeds up to £100,000. To unsubscribe from receiving further Direct Mail communication from People's Postcode Lottery please write to Unit 9, Block 12, Bleasdale Court, Clydebank G81 2LE. Postcode Lottery Limited is incorporated in England and Wales and is licensed and regulated by the Gambling Commission under licences 000-000825-14-102511-014 and 000-000825-14-102512-015. Registered office: Postcode Lottery Ltd, Titchfield House, 69/85 Titchfield Street, London, EC2A 4RR. Company reg. no 04862732. VAT reg. no 848 3165 07.

(emphasis in red box added by authors)

### 3.3.6.8 Sexuality or enhanced attractiveness

Three adverts (1%) plausibly implied a link between gambling and sexual success, seduction or enhanced sexual attractiveness (Table 3.11). For example, a print advert for StarWins.co.uk used the language "Frooti Booti" and "Peachy Ass". In two television adverts for HealthGames.co.uk, a female was seen cradling a man's head and kissing him affectionately. As the advert was also simultaneously suggesting that the male has just won on the game, this could imply that his gambling success had enhanced his attractiveness or desirability (Figure 3.42).

**Figure 3.42: Frames from television advert plausibly suggesting success in the gamble enhanced attractiveness or desirability**



### **3.3.6.9 Personal and social success**

One-in-ten adverts (9%) plausibly implied that gambling was a key component in personal success or the success of personal relationship or social event (Table 3.11). Typically, adverts evoked attractive personal qualities or experiences and linked them to the gambling opportunity (Figure 3.43). For example, a Coral television advert claimed “*The Cheltenham Festival. Speed, stamina, and sheer guts. It’s got it all, including this Coral super offer*” (Figure 3.44). Other examples included suggestions that winning a gamble resulted in greater personal success among peer groups, such as a Betfair television advert which showed an individual placing a bet on a horse and then being celebrated and hugged by his peers once the horse does eventually win.

**Figure 3.43: Advert plausibly suggesting that gambling was integral to, or could improve enjoyment of, a sporting event (personal and social success)**

**Ladbrokes**

**CHELTENHAM FESTIVAL**  
**TRIUMPH HURDLE**

**DOUBLE YOUR WINNINGS IF YOUR HORSE WINS**

**#BoostYourCheltenham**  
 Available Online. Additional winnings paid as free bets up to £25.

DOWNLOAD THE APP NOW

WHEN THE **FUN** STOPS **STOP**

BeGambleAware.org

Double your winnings: Applies to first bet placed on the Triumph Hurdle at the Cheltenham Festival from 5pm 15/03/18. Max free bet/s to the value of £25. Any free bets of £20 or more will be split into two equal free bets and must be used in their entirety. Free bet/s will be awarded within 24 hours of bet settlement and will expire after 24 hours. Applies to win singles and the win part of each-way singles. Stake not returned on winning free bets. Full terms at ladbrokes.com. 18+ PLEASE BET RESPONSIBLY begambleaware.org - Need Help? Call the National Gambling Helpline on 0800 602 0133

### 3.3.6.10 Tough or masculine behaviour

One-in-twenty adverts (5%) plausibly portrayed gambling in a context of toughness or linked it to masculine, resilient, or reckless behaviour (Table 3.11). Examples included confrontational or challenging language such as “*Do you wanna bet?*”, “*Take em on*”, “*Big calls take big balls*”, “*Speed, stamina, and sheer guts, it’s got it all*” and “*Do you have the balls to call with your good hand?*” Such connotations were also implied through visual images depicting tough, challenging or aggressive behaviour (Figure 3.44). A BetFair advert interspersed footage of an actor placing a bet on a sporting match with documentary footage showing a big cat hunting prey, which could suggest that the gambler displayed similar predatory behaviour. A print advert for StarWins.co.uk encouraged players to be tough, manipulative or forceful in their play: “*Adopt the low hanging fruit policy. Pick the easiest targets*”, “*Maximise your advance by choosing opposition you know you can exploit*”, and



“Remember it’s a mind game! Ideally you want to play against players who are uncomfortable with the relentless pressure of being in the firing line”.

**Figure 3.44: Advert plausibly suggesting tough, masculine or aggressive behaviour**

first race special  
**MONEY BACK AS A FREE BET\* IF YOU LOSE**  
 1.30 EVERY DAY CHELTENHAM  
 NEW & EXISTING CUSTOMERS  
 \*MAX REFUND £20/€20

BRITAIN'S MOST POPULAR ONLINE BOOKMAKER  
**sky bet**  
 BETTING, BETTER

DOWNLOAD THE APP NOW

\*Customers will be credited with their refund as a free bet within 24 hours of the race finishing. Free bet stake not returned. Eligibility restrictions apply. Applies to bets placed after 08:00 on 23/02/2016. Offer applies to first bet only. Max free bet refund £20/€20. 3 day free bet expiry. 18+ only. T&Cs apply. BeGambleAware.org. Visit Skybet.com for more information.

WHEN THE **FUN** STOPS **BeGambleAware.org**

### 3.3.6.11 Rite of passage

Only one advert plausibly implied that gambling constituted a rite of passage (Table 3.11). This direct mail advertising for The Football Pools included the following testimonial from a previous winner: “It has been a family tradition to play the pools. I have always enjoyed playing and this win has come at the perfect time” (Figure 3.45). This implies that gambling is transgenerational, and that taking part was a key aspect of growing up in that family.

**Figure 3.45: Advert plausibly suggesting rite of passage**

**PLAY NOW FOR EVEN MORE CHANCES TO WIN!**

**East Sussex Man**  
**won £98,356**  
*“This couldn’t have happened at a better time, I’m retiring next week!”*

**Hillington Lady**  
**won £45,076**  
*“What an amazing thing to happen. I just can’t believe it!”*

**Pools Privileges winner Mr Cook**  
**won a £300 Lifestyle voucher**  
*“How wonderful, I can’t wait to treat myself!”*

**Mr Cox won our Car Prize Draw!**  
*“I am simply amazed, thank you so much!”*

**Wiltshire man**  
**won £61,945**  
*“It has been a family tradition to play the pools. I have always enjoyed playing and this win has come at the perfect time.”*

**PRIZE DRAWS AND MUCH MORE...**

(emphasis in red box added by authors)



### **3.3.6.12 Isolated activity**

None of the gambling advertising plausibly suggested that isolated or solo gambling was preferable to social gambling.

### **3.3.6.13 Appeal to children or young persons**

Around one-in-ten adverts (11%) contained plausible appeal to children and young people ( $\leq 17$  years old) or were associated with aspects of youth culture (Table 3.11). Three elements were identified. First, adverts used language which may appeal to, or resonate with, young people, such as “*Starburst*” (the name of a popular confectionary in the UK), “*House Party*”, “*Frooti Booti*”, “*Rainbow Riches*”, “*Cool Bucks*”, and “*Ninja Master Slot Game*”. Second, adverts used graphic designs and images that may appeal to young people, particularly the use of cartoon and colourful graphics (Figure 3.46a & 3.46b). Last, adverts used exciting narratives and themes which may appeal to young people, such as showing animals hunting, using phrases such as “*the excitement is non-stop*”, and showing gambling behaviour to be associated with adrenaline, excitement, and fun.

**Figure 3.46a: Advert whose design may plausibly appeal to young people**

Visit [starsportsbet.co.uk/festival](http://starsportsbet.co.uk/festival)  
for ante post prices (NRNB), video previews,  
free PDF stats guide, daily movers & more

TODAY ONLY, BACK  
**GETABIRD**  
FOR THE  
SUPREME NOVICES'  
HURDLE AT...



FOR UP TO  
**£100**

18+ gambleswast.co.uk

**CHELTENHAM  
PRICE JUMP!**

For the last day before Cheltenham, we're offering enhanced odds on Getabird in tomorrow's Supreme and we'll lay it to a sizeable stake. Win only. Non-runner no bet. For an exclusive betting experience call 08000 521 321 or visit [starsportsbet.co.uk](http://starsportsbet.co.uk)

**STAR★SPORTS**  
THE GENTLEMAN'S BOOKMAKER

Figure 3.46b: Advert whose design may plausibly appeal to young people

**PRIZE DRAW**

# LUCKY CLOVER

Play our Lucky Clover game for entry in the draw! Match a number and you could be on track to win a cool

## £8,000 CASH

Does your Lucky Clover number match one printed on the enclosed Entry Form?

If you've matched a number, peel off your label and place it in the designated area on the enclosed Entry Form.

NO PURCHASE NECESSARY TO ENTER. E.&O.E.

## IRISH LOTTO FACTS & FIGURES

**76%** That's how much easier it is to win a jackpot on the Irish Lotto than on the UK National Lottery!

The largest ever Lotto jackpot of €18.9 Million was won on 28<sup>th</sup> June 2008 by a syndicate of 16 colleagues at a quarry and concrete plant in Bennekerry.\*

Since it opened in 1982, Carey's Newsagents in County Mayo has sold no less than 5 golden lotto tickets! The latest lucky ticket made one happy customer over €13 Million richer!

One lucky punter scooped a €13.7 Million lottery jackpot in 2016

Ireland's flagship National Lottery game has been turning ordinary people into millionaires since 1988. More than €7 Billion in prizes from all games has been awarded since that time.

Draws are held each Wednesday & Saturday in Dublin

gambleaware.co.uk GAMBLE RESPONSIBLY the lottery centre 18+ E.&O.E.

### 3.3.6.14 Featuring those under 25 years old

Around one-in-ten adverts (8%) included a child who appeared to be aged under 15 years old or characters who appeared to be under 25 years old (Table 3.11). This included sportspersons and celebrities verified as being under 25 when the advertising was published, such as Manchester City footballer Gabriel Jesus (20 years old) (Figure 3.47a), and actors who appeared to be under 25 years old. An advert for the Health Lottery depicted children clearly under 15 years old, albeit only as suggested benefactors of charity donations (Figure 3.47b).



Figure 3.47a: Advert featuring those under the age of 25 years old

**MAKE THIS YOUR...**

**BEST  
BUY  
OF THE  
SEASON**

**£5 MILLION TOP PRIZE!**

**GUARANTEED WINNERS EVERY WEEK!**

(At time of print, Alex Oxlade Chamberlain - front centre - was only 24 years old)





Figure 3.48: Content plausibly making associations with luck

**PRIZE DRAW**

# LUCKY CLOVER

Play our Lucky Clover game for entry in the draw! Match a number and you could be on track to win a cool

## £8,000 CASH

Does your Lucky Clover number match one printed on the enclosed Entry Form?

25312

If you've matched a number, peel off your label and place it in the designated area on the enclosed Entry Form.

NO PURCHASE NECESSARY TO ENTER

E.&O.E.

©2018 8LE-0221D

## POSTCARD

Greetings from Ireland

On March 17 each year, St Patrick's Day is celebrated by young and old alike! Parades, festivals and ceilidhs take place across Ireland. Meanwhile, glasses are raised and toasts are made across the world in honour of both the day and its namesake. Like so many people, my ancestors had links with Ireland and for that reason it's always been one of my favourite days of the year. How do you celebrate St Patrick's Day?

Legend has it that St Patrick used the green shamrock in his teachings, a symbol of Irish luck and tradition. Could it be lucky for you? The Irish Lotto is loved by players all around the world, don't miss your opportunity to play!

Reply today!

Lá Fhéile Pádraig Sona Duit!  
Happy St Patrick's Day!

Michael

gambleaware.co.uk  
GAMBLE RESPONSIBLY

©2018 8LE-0215E (4)1927

### 3.3.6.16 Criminal or anti-social behaviour

Only one advert (<1%) could have plausibly implied or condoned criminal or anti-social behaviour (Table 3.11). The print advert, for StarWins.co.uk, used the phrase "...where we have all kinds of big cash jackpots for you to heist" (Figure 3.49). Although this is not an explicit reference to criminal or antisocial behaviour, and the context relates to an actor in a film, it did



nevertheless refer to a 'heist', a term synonymous with taking valuable items or money illegally and often forcefully from a place or person.

**Figure 3.49: Content plausibly making associations with criminal behaviour**

and taking advantage of your foe's playing habits, you can set them up for a big fall! More tips: [www.tinyurl.com/HUdaboss](http://www.tinyurl.com/HUdaboss)

*Marbella Slim*  
Marbella Slim

**FREE BET FREEROLLS EVERY THURSDAY!**

Available on the App Store

**STAR WINNER**

**TAKE THE MICKY**

When it comes to doing celebrity impressions, everyone's got a Michael Caine in the locker. Feel free to dust yours off and inflict it on friends and family for Sir Michael's 85th today! And then come do an Italian Job on StarWins.com where we have all kinds of big cash jackpots for you to heist!

**DAILY STAR GAMES**

**WWW.STARWINS.CO.UK**

(emphasis in red box added by authors)

### 3.3.6.17 *Linked to work*

None of the gambling marketing condoned or featured gambling in a working environment.

### 3.3.6.18 Glamorous

Twelve adverts (4%) plausibly suggested that gambling was glamorous and desirable or that it could lead to a glamorous and desirable lifestyle (Table 3.11). Examples included offering “an exclusive betting experience”, connotations of grand, decadent, or desirable status (e.g. characters shown wearing expensive jewellery), use of language associated with glamour (e.g. “love a bit of bling”), and characters dressed in smart, elaborate or formal clothes (Figure 3.50).

**Figure 3.50: Content plausibly making associations with glamorous and desirable behaviour**

EVERY RACE AT CHELTENHAM

**FREE BET**

IF **2<sup>ND</sup>** OR **3<sup>RD</sup>** TO THE SP FAV

**OR IF YOUR HORSE FALLS\***

AT THE FIRST OR LAST JUMP

BoyleSports

Download on the App Store

GET IT ON Google Play

0800 44 00 00 · BOYLESPORTS.COM

\*18+, UK/IRE customers only. Max refund £/€20. Win or win part of a/hc outright singles only. Min field size required. 1st bet on each race. Free bet expires after 7 days. Freehold/tenepost bets don't qualify. T&Cs apply. \*\*18+, UK/IRE customer only. Max refund €120. Win or win part of a/hc outright singles only. 1st bet on each race. Free bet expires after 7 days. Freehold/tenepost bets don't qualify. T&Cs apply. See boylesports.com/promotions for full details. Have fun - bet responsibly - gamblersaware.co.uk - 0800 9020 133

### 3.3.6.19 Normal, frequent or daily behaviour

A third of adverts (33%) plausibly suggested that gambling was, or should be, a normal and regular behaviour (Table 3.11). This included: frequent references to gambling “every day”; that gambling could take place over an extended period (e.g. “1/4 odds a place in every race at this week’s Cheltenham Festival”); that offers and bonuses occurred regularly (e.g. “Between 9-11 every night...”); and that lottery draws took place regularly (e.g. “Five draws a week”) (Figure 3.51).



**Figure 3.51: Content plausibly suggesting gambling and frequent or daily behaviour**

**GET MORE EVERY DAY**  
with our strongest racing lineup yet

*William* **HILL**

**Get High Five today at Uttoxeter and Kempton**  
Win by 5 lengths and get a 15% free bet bonus  
**High 5**

**Get Flash Odds Every day**  
Huge offers daily at 12pm. Limited availability.  
**FLASH ODDS**  
WHEN IT'S GONE, IT'S GONE

WHEN THE **FUN** STOPS **STOP**

BeGambleAware.org 18+

High Five: Selected races. Retail bets at SP. Singles only. 6+ runners. Max bonus £100. Free bet rules & terms apply. Flash Odds: Stake restrictions apply. Limited availability. William Hill rules apply. Over 18s only. FOR ADVICE & INFORMATION VISIT WWW.BEGAMBLEAWARE.ORG. NATIONAL GAMBLING HELPLINE 0808 8020 133.

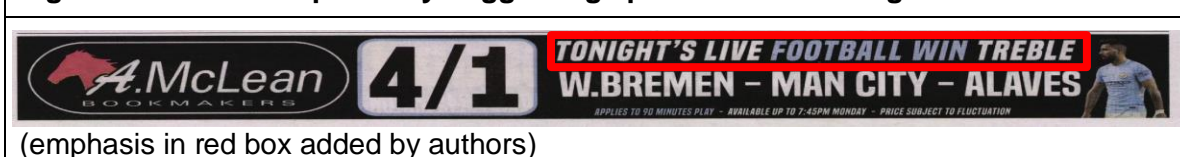
(emphases added)

### 3.3.6.20 Time or event specific references to gamble

Four fifths of adverts (80%) made time- or event-specific references to gamble (Table 3.11). This included suggestions: to gamble on specific days (e.g. “*Man Utd v Brighton, Saturday 7:45pm*”); to bet during specific parts of the week (e.g. odds for a range of matches taking place over an entire weekend) (Figure 3.52); to gamble that day or straight away (“*Join now*” or “*Play now*”); and to bet on events described as taking place at specific times (e.g. “*5 places on the 2.10pm and 4.10pm races & 4 places on the 3.30pm race*”). These references may create a sense of immediacy or urgency to take part in the bet or imply that gambling is a behaviour intrinsically linked with that event. Such references may also embed the notion of

gambling into existing planned behaviour around that event, for example if already planning to watch a football match on television.

**Figure 3.52: Content plausibly suggesting specific moment to gamble**



### 3.4 Summary of Key Findings

#### Advertising presence

- Gambling advertising was present across all paid-for advertising channels, ranging from traditional (e.g. television) to digital media (i.e. internet banners and e-mail). However, over three quarters of gambling advertising sampled was from print press (i.e. newspapers).
- Adverts referenced over 40 gambling brands, showing a high level of diversity. The majority of adverts promoted bookmakers and sports betting. Other forms of gambling (e.g. casino, bingo, and lotteries) were also represented, albeit to lesser extent.

#### Design features and content used to create appeal

- Brand visibility was a central component of gambling advertising. This included extensive use of brand logos, slogans, big brand claims, and links to other marketing activities (e.g. websites and social media). Slogans and big brand claims were carefully crafted to engage interest, provide reassurance, create the expectation of winning, and to evoke perceptions of quality. Links to other marketing activity illustrate how advertising performs multiple functions in terms of creating awareness, facilitating easy access to gambling opportunities, and providing pathways to engage with other marketing content.
- Design and content features often explicitly highlighted the intended gambling behaviour, for example, through signposts to participate (i.e. link to smartphone app or websites), language which personalised the gamble (i.e. phrases such as '*You could win big*'), and calls to action (i.e. '*Follow these three steps to receive your bonus*').
- Gambling adverts frequently featured content and messages which tied the gamble to contexts, cultures, or stimuli that provides an opportunity for brands to associate themselves with attractive and emotionally arousing phenomena which are likely to increase their visibility, appeal, and potential influence among target consumers. Examples included references to a sport or game, a real world event a well-known sportsperson and to a specific team.

#### Consumer information and messaging

- Over one-in-ten gambling adverts did not contain any age restriction warning or message. Of the adverts which did have such messages, more than four-fifths were rated as 'very poor' visibility (i.e. less than 10% of advert space).
- Over one-in-ten gambling adverts did not contain any consumer protection messages or support for gambling-related harm. Of the adverts which did contain such messages, over half were rated as 'very poor visibility' (i.e. less than 10% of advert space).

- Over one-in-ten gambling adverts contained no T&Cs about the gamble promoted. Of the adverts which did contain T&Cs, three quarters were rated as 'very poor' visibility (i.e. less than 10% of advert space).
- For age restriction warnings, consumer protection messages, and terms and conditions, most information appeared in small fonts, outside the main advert frame, and juxtaposed against more visually stimulating marketing content. Most lower-risk gambling messages did not reference gambling-related harms

### **Information about the gamble**

- Advertising contained a range of complex information about the gambles promoted. Examples included promoting specific bets and gambles, suggested odds and wagers, outlining offers and bonuses, indicating free or matched bets, providing opportunities to minimise risk, and suggestions that gambles or offers were time-limited.
- On average, most gambling adverts presented three to four pieces of information about the gamble and associated offers. Presenting a high volume of complex information simultaneously is likely to place a large cognitive load on the consumer, which may mean that not all information is sufficiently processed.

### **Messages suggested about gambling behaviour and consequences**

- Some gambling advertising contains content or implicitly and explicitly evokes themes which are not permitted under existing self-regulatory codes of conduct.
- It was plausible that one-in-five gambling adverts contained messages or connotations which may exploit the susceptibilities, aspirations, incredulity, or inexperience of young or other vulnerable groups.
- It was plausible that around one-in-ten gambling adverts contained messages or connotations which suggested that gambling could either enhance personal qualities, was linked to enhanced personal or social success, may appeal to children or young persons, or exploited cultural beliefs or traditions about gambling or luck.
- Over three-quarters of gambling adverts encouraged gambling behaviour at a specific time or on a specific day, while one third of advertising implied that gambling was a normal or regular behaviour.

## CHAPTER 4: FREQUENCY ANALYSIS: SPORTS SPONSORSHIP

### 4.1 Introduction

Sponsorship is a particularly effective form of marketing as it allows brands to associate themselves with attractive and emotionally-arousing cultural phenomena such as music, celebrity and sport, thereby increasing their visibility, appeal and power among target markets<sup>59,60</sup>. Sponsorship is not limited to any one media channel, which means it can enhance the salience and reach of other marketing such as competitions, television advertisements, and digital and social media marketing. As noted in the literature review, sports sponsorship has been shown to be a prevalent and high-profile means of marketing for gambling companies in the UK in recent years, particularly in football.

This chapter presents results from a content analysis which examined the frequency and nature of gambling marketing in televised and radio broadcasts of professional sporting events in the United Kingdom. The chapter begins by describing the methods used to collect and analyse the data (4.2); next we present our results (4.3); and last we present a summary of key findings (4.4).

### 4.2 Methods

#### 4.2.1 Design

We conducted a frequency analysis of all verbal and visual references to gambling marketing or gambling brands observed during television and radio broadcasts of professional sporting events broadcast in the UK in 2018. The design was informed by previous studies into alcohol sponsorship of televised top class English club football<sup>61</sup>, the UEFA EURO 2016 football tournament<sup>62</sup> and Formula One racing<sup>63</sup>. Such methods have also been used to assess frequency of alcohol and gambling marketing references in Australian sports broadcasts<sup>33,64</sup>.

#### 4.2.2 Selection of Broadcasts

A purposive sample of professional sporting events ( $n=10$ ) were recorded as broadcast in the UK on either public service (e.g. BBC) or commercial broadcasters (e.g. Sky Sports or BT Sports) (Table 4.1). The sample also included one radio broadcast on a commercial sports radio station (TalkSport).



**Table 4.1: The sample of television and radio broadcasts captured in 2018, by sport**

<b>Sport</b>	<b>Competition</b>	<b>Fixture</b>	<b>Date</b>	<b>Broadcast channel</b>
Football	English Premier League	West Ham United vs. Manchester United	29 <sup>th</sup> September 2018	BT Sport
Football	English Premier League	Bournemouth vs. Crystal Palace	1 <sup>st</sup> October 2018	Sky Sports
Football	English Premier League	Crystal Palace vs. Tottenham Hotspur	10 <sup>th</sup> November 2018	Talk Sport <sup>1</sup>
Football	Ladbrokes Scottish Premiership	Rangers vs. Celtic	11 <sup>th</sup> March 2018	Sky Sport
Football	UEFA Champions League	Tottenham Hotspur vs. Barcelona	3 <sup>rd</sup> October 2018	BT Sport
Football	International Friendly	England vs. Italy	27 <sup>th</sup> March 2018	ITV 1
Tennis	French Open	Rafael Nadal vs. Dominic Thiem	10 <sup>th</sup> June 2018	ITV 1
Rugby	RBS Six Nations	Scotland vs. England	24 <sup>th</sup> February 2018	BBC One
Formula One	F1 World Championship	British Grand Prix	8 <sup>th</sup> July 2018	Channel 4
Boxing	World Cruiserweight Title fight	Tony Bellew vs. Oleksandr Usyk	11 <sup>th</sup> November 2018	Sky Sports

Notes:

<sup>1</sup> This broadcast was from the radio, all others were from television.

All the selected broadcasts were recorded in their entirety as they were broadcast, using recordable DVD players, audio capture software (for the radio broadcast) or an on-demand TV and radio service which is available for academic institutions (Box of Broadcasts). Each recording included normal playing time (e.g. the full football match or full Formula One race), added time, extra time, pre-and post-match interviews and discussion, half-time analysis, and any commercial breaks. The recordings did not include any pre-or post-match discussion, interviews or highlights which were not part of the main scheduled broadcast (e.g. content on on-demand television, content uploaded to sports news sites, and content accessible through interactive television).

### 4.2.3 Defining Gambling Marketing References

Consistent with previous research into alcohol marketing, a gambling marketing reference was defined as any visual reference to gambling or to a gambling brand, lasting one second or more, during the broadcast programme or commercial break<sup>62</sup>. A reference was counted each time it appeared, irrespective of whether it had been previously seen (e.g. a pitch-side advertising board seen in-play first and then again in a replay of that action). A new reference was counted each time the camera angle changed, even if the reference source remained the same (e.g. pitch-side advertising first viewed from behind the goal and then again when the angle reverted to the wide side-line angle). A new reference was also counted

if a source went out of shot for more than a second (e.g. if the camera panned away from the pitch-side advertising and then back again).

If multiple different references were presented at the same time, (e.g. static and electronic pitch advertising), each was recorded as a separate reference and were not combined. If multiple identical references were visible at the same time (e.g. if the same brand name or slogan appeared multiple times on the pitch border), they were recorded as 'identical references visible at the same time'. The only exception to this occurred when gambling marketing appeared as a shirt sponsor in a multiple-participation (team) sport. Coding each brand every time they appeared on players' shirts would have been prohibitively slow, therefore if multiple references to different gambling brands of the same format were visible (e.g. two different gambling sponsors visible on players' shirts at the same time) these were coded as 'multiple brands'.

#### 4.2.4 Codebook Variables

All gambling marketing references were captured using a codebook that was developed based on studies which recorded alcohol references in professional televised football<sup>61,62</sup>. Each reference was coded on the following nominal or continuous criteria. See Appendix One for full codebook.

- In or Out of play (e.g. whether the reference appeared during the football or tennis match or out of play such as during an advert break or studio punditry).
- Type of reference (e.g. whether the reference was visual, verbal or both).
- Location (e.g. border of sporting area of play, interview area, pre-recorded video segments).
- Format (e.g. static advertising, electronic advertising, and commercial advertisement).
- Duration of reference (in seconds).
- Number of identical references visible at same time (e.g. multiple pitch borders).
- Gambling brand featured (e.g. Ladbrokes, William Hill).
- Type of gambling referenced (e.g. Bookmaker, Online Bingo, Casino).
- Age restriction message (e.g. 18+).
- Consumer protection message (e.g. 'When the fun stops, STOP').
- Nature of brand reference (e.g. direct reference – such as brand names/logo – or indirect reference - although a name/logo did not appear, the brand was identifiable from other signifiers such as phrases from brand slogans, colours, and typefaces).

An initial codebook was developed and piloted on one of the captured sports broadcasts, and revised based on discussion among the research team. After being recorded, all 10 broadcasts were systematically coded by AM or RP. All DVDs were played on Windows Media Player, using the pause and rewind function as required. Data were coded into a SPSS spreadsheet designed around the codebook. A separate spreadsheet was used for each broadcast.

RP and AM both independently coded part of one football broadcast (Rangers v Celtic). A football match was chosen to test inter-rater reliability given that this sport represented the majority of the broadcasts sampled. Only a section of the broadcast was coded due to the high levels of inter-rater reliability shown in previous applications of the codebook<sup>62</sup>. Both researchers coded 30 minutes of footage (15 minutes of pre-match content and 15 minutes of in-play content). Both coders then met to discuss any major discrepancies. Following discussion, inter-rater reliability was established through percentage agreement on the number of references coded for the categorical variables (e.g. number of references in the pre-match), an approach consistent with previous applications of the codebook<sup>62</sup>. When computed across each section of the codebook, there was high agreement for broadcast segment (100%), reference type (100%), reference location (94%), reference format (97%), content of the reference (100%), and which brand was featured (94%). There was also no significant difference in the average number of identical references coded for each reference or the average duration of each reference between the two coders. These estimates exceed the suggested 70% threshold for acceptable inter-rater agreement using the percentage measure<sup>56</sup> and are consistent with previous uses of this codebook<sup>62</sup>.

#### **4.2.5 Data Analysis**

Data were analysed using SPSS version 23 (SPSS Inc). All analyses were computed separately by sport. The television and radio football broadcasts were also analysed separately, due to fundamental differences in the media design (i.e. one is exclusively audio, whereas the other has audio and visual content). Frequencies and percentages were calculated for total number of gambling references, broadcast segment (in play vs. out of play), type of references (verbal, visual or both), location of references (e.g. area of play), format of references (e.g. branded merchandise), gambling brands referenced, and the content of references (e.g. logos, signposts to gamble, consumer protection messages, age restriction messages). Range, sum and medians were computed for the duration of gambling references and number of identical gambling references visible at the same time.

For each broadcast, we calculated the average number of gambling references per minute (total number of references divided by the length of the broadcast [in minutes]). This was further converted into the estimated frequency of gambling marketing references in seconds (number of seconds in a minute (60) divided by the average number of references per minute). As the length of each broadcast was dictated by the sport and scheduled time allocated to the programme, both of these metrics provided a means to compare across sport and broadcast types. For football, where multiple television broadcasts were captured, the average number of references per minute and estimated frequency of references (in seconds) was computed for each television broadcast separately and for a combined total.

### **4.3 Results**

#### **4.3.1 Boxing**

One highlights programme featuring a full boxing match was recorded in its entirety as it was broadcast on the satellite pay-per-view channel Sky-Sports on November 11<sup>th</sup> 2018. This broadcast was chosen because it allowed us to record and analyse the entire match without featuring the accompanying matches (known as the 'undercard') which were included when the programme originally aired on November 10<sup>th</sup> 2018. Analysis was only conducted on the main event (Tony Bellew vs. Oleksandr Usyk). The broadcast provided 76 minutes and 18

seconds of footage and included the pre-match build up including ring-walks, the entire match, and approximately 30 minutes of post-match analysis and interviews.

Within this time period, 358 gambling marketing references were recorded, an average of 4.70 per broadcast minute (Table 4.2). This equated, on average, to a gambling marketing reference once every 13 seconds. The most popular location of references was the ring itself which featured static gambling advertisements on the canvas, the ropes and the corner covers (Figure 4.1). William Hill was the official sponsor of the event and the most popular brand featured (73%). Brand logos for gambling companies appeared in 99% of the references. The median duration of references was nine seconds and gambling references were present for a total of 84 minutes out of a 76 minute broadcast due to multiple types of references (characteristics and content) being visible on screen at the same time. There were no consumer protection messages and age restriction messages appeared in less than 1% of the references.

**Table 4.2: Summary of gambling references in boxing broadcast**

Variable	As seen in broadcast
Total references in broadcast	358
Average references per minute	4.70
Proportion of references in play	47%
Proportion of references out of play	53%
Most popular location of references	Area of play (48%)
Most popular format of references	Static ad (73%)
Most featured brand	William Hill (73%)
Median duration of references	9 seconds
Total duration of references	84 minutes
Total number of identical references	2,208
Referenced that featured logos	99%
Consumer protection messages	0%
Age restriction message	<1%

**Figure 4.1: Examples of gambling sponsorship from the boxing broadcast**



Image sources: <https://www.liverpoolecho.co.uk/sport/boxing/usk-vs-bellew-live-updates-15398904>; <https://www.rt.com/sport/443676-usk-bellew-world-title/>

### 4.3.2 Football

Five television broadcasts of football matches were recorded between March and October 2018 (Table 4.1). All matches were recorded in their entirety as broadcast on either Sky Sports, BT Sports or ITV1. One match (Rangers versus Celtic) was recorded on Sky Sports Main Event channel which switched coverage to another match shortly after the final whistle



which meant that the broadcast did not feature post-match analysis. The five television broadcasts combined provided a total of 15 hours, 44 minutes and 28 seconds of coverage.

Within this combined time period, 2,595 marketing references were recorded, an average of 519 references per televised match (Table 4.3). Gambling marketing references appeared, on average, 2.75 times per broadcast minute which equated to a reference every 21 seconds. The majority of references (77%) featured in play during the match itself. The most popular location of references was the border of play (e.g. electronic or static pitch-side advertising hoardings, which accounted for 38% of the references). The most popular format of references was branded merchandise (e.g. player's shirts, 41%). Gambling brand logos appeared in 99% of the references and the most featured gambling brand was Betway (27%). The median duration of references was five seconds and the total duration of references was 377 minutes across the five broadcasts. Consumer protection and age restriction messages appeared in 3% of references but were largely confined to commercial advertising breaks (Figure 4.2 and Figure 4.3).

Table 4.3 also contains a breakdown of gambling references per televised match. It shows there were differences across football broadcasts depending on the competition and teams featured. There was a high volume of total gambling marketing references in televised games from the English Premier League (667 for West Ham v Manchester United and 974 for Bournemouth vs. Crystal Palace) and Scottish Premier League (920 total references per game for Rangers vs. Celtic) games compared to the men's international friendly (9 references for England vs. Italy) and UEFA Champions League (25 references for Tottenham Hotspur vs. Barcelona) games. The domestic league matches also featured gambling marketing references 6.18 times per broadcast minute (Rangers v Celtic), 4.01 times per broadcast minute (Bournemouth vs. Crystal Palace) and 3.95 times per broadcast minute (West Ham vs. Manchester United), compared to the much lower 0.05 per minute for England v Italy and 0.12 per minute for the Tottenham v Barcelona match.

Televised matches which featured two teams sponsored by gambling brands each featured over 900 references per broadcast (Rangers versus Celtic and Bournemouth versus Crystal Palace). As Table 4.3 illustrates, the most popular format of references in both these games was branded merchandise which accounted for 49% of references in the Rangers vs. Celtic match and 38% of references in the Bournemouth vs. Crystal Palace match.

One broadcast of a football match was recorded 10<sup>th</sup> November 2018, from a commercial sports radio station (TalkSport) (Table 4.1). The broadcast provided 129 minutes and 13 seconds of coverage. Within this, 18 gambling references were recorded, which equates to 0.14 references per broadcast minute (Table 4.3). The majority of the references featured out of play (78%) and the most popular format was the commentator voice (56%). In most instances, the references were discussions of gambles and odds related to the scheduled match, including input from a commentator from an official betting partner (Betfair 83% of references). The median duration of references was eight seconds, and the total duration across the entire broadcast was 4.3 minutes. Almost half of references contained consumer protection or age restriction messages (both 44%).

**Table 4.3: Summary of gambling references in television and radio football broadcasts**

Variable	Television						Radio
	All television combined	Celtic vs. Rangers	England vs. Italy	Tottenham vs. Barcelona	West Ham vs. Man United	Bournemouth vs. Crystal Palace	Crystal Palace vs. Tottenham
Total references in broadcast	2,595	920	9	25	667	974	18
Average references per minute	2.75	6.18	0.05	0.12	3.95	4.01	0.14
Proportion of references in play	77%	81%	11%	0%	73%	78%	22%
Proportion of references out of play	33%	19%	89%	100%	27%	22%	78%
Most popular location of references	Border of play (38%)	Area of play (43%)	Ad break (89%)	Ad break (60%)	Border of play (50%)	Area of play (29%)	- <sup>1</sup>
Most popular format of references	Branded merch. (41%)	Branded merch. (49%)	Commercial ad (89%)	Electronic ad (36%)	Static ad (44%)	Branded merch. (38%)	Commentator voice (56%)
Most featured brand	Betway (27%)	Multiple brands (49%)	William Hill (22%)	Bet365 (24%)	Betway (97%)	M88 (58%)	Betfair (83%)
Median duration references	5 seconds	5 seconds	30 seconds	4 seconds	6 seconds	5 seconds	8 seconds
Total duration of references	377.0 minutes	116.5 minutes	3.8 minutes	3.5 minutes	127.0 minutes	126.2 minutes	4.3 minutes
Total number of identical references	11,818	3,164	9	73	4,718	3,854	1
Logo	99%	99%	89%	100%	100%	100%	78%
Consumer protection messages	3%	2%	67%	20%	2%	3%	44%
Age restriction message	3%	2%	78%	20%	3%	3%	44%

Notes: <sup>1</sup> Code was not possible as match broadcast on the radio (i.e. no visuals);

**Figure 4.2: Examples of gambling sponsorship from the football broadcast**



Image sources: BT Sport and Sky Sports

**Figure 4.3: Examples of gambling advertising during commercial breaks in football broadcasts**

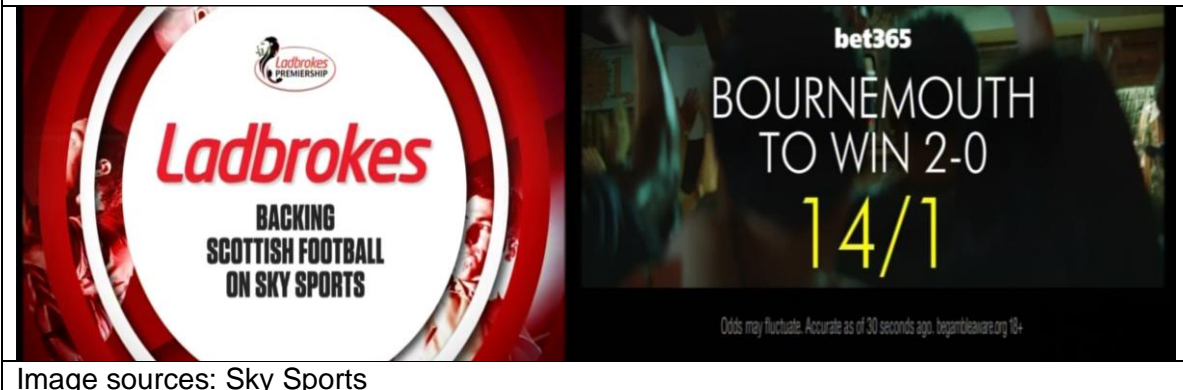


Image sources: Sky Sports

### 4.3.3 Rugby Union

One international rugby union match (Scotland vs. England) was recorded in its entirety as broadcast on BBC One on 24<sup>th</sup> February 2018. This provided 185 minutes and 8 seconds of footage.

Within this time period, 101 references to gambling were recorded, an average of 0.55 references per broadcast minute (Table 4.4). The majority of references featured in play (92%) and the most popular format and location of references were static advertisements (93%) located on the border of play (98%). All of the references captured (100%) were advertisements for the National Lottery funded Sports Scotland agency for sport (Figure 4.4) and the National Lottery brand logo featured in all references (100%). The median duration of

references was two seconds and the total duration of references was 4.8 minutes across the entire broadcast. There were no consumer protection (0%) or age restriction (0%) messages featured.

**Table 4.4: Summary of gambling references in the rugby broadcast**

Variable	As seen in broadcast
Total number of identical references	101
Average references per minute	0.55
Proportion of references in play	92%
Proportion of references out of play	8%
Popular location of references	Border of play (98%)
Popular format of references	Static advertisement (93%)
Most featured brand	Lottery funded Sports Scotland (100%)
Median duration of references	2 seconds
Total duration of references	4.8 minutes
Total number of identical references	101
Logo	100%
Consumer protection messages	0%
Age restriction messages	0%

**Figure 4.4: Examples of gambling sponsorship from the rugby broadcasts**



Image sources: BBC One [Emphasis in red box added by authors]

#### 4.3.4 Tennis

One tennis match from the French Open tournament (men's final) was captured as it was broadcast in its entirety on ITV 1 on 10<sup>th</sup> June 2018. This provided 245 minutes and 20 seconds of footage (Table 4.5).

Within this time period, 26 references to gambling were recorded, an average of 0.11 references per minute. Only 4% of references featured in play with the majority (96%) recorded out of play. The most popular format and location of references was during sponsor lead-ins (85%). Bet365 were the official sponsors of the coverage and featured in 85% of the references (Figure 4.5). The median duration of references was 7 seconds and the total duration of references was 4.5 minutes across the entire broadcast. Gambling brand logos featured in 96% of the references. Consumer protection messages and age restriction messages featured in 96% of the references.



**Table 4.5: Summary of gambling references in tennis broadcast**

Variable	As seen in broadcast
Total number of identical references	26
Average references per minute	0.11
Proportion of references in play	4%
Proportion of references out of play	96%
Popular location of references	Sponsor lead in (85%)
Popular format of references	Sponsor lead in (85%)
Most featured brand	Bet365 (85%)
Median duration of references	7 seconds
Total duration of references	4.5 minutes
Total number of identical references	26
Logo	96%
Consumer protection messages	96%
Age restriction messages	96%

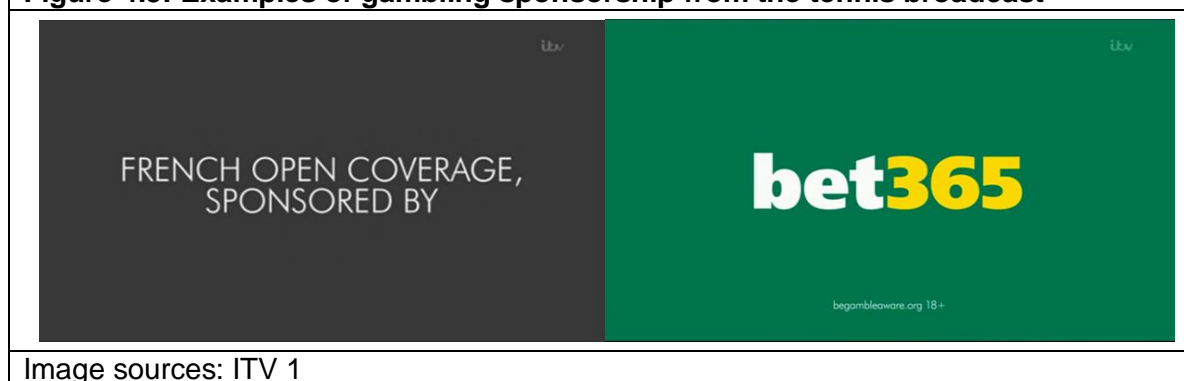
**Figure 4.5: Examples of gambling sponsorship from the tennis broadcast**

Image sources: ITV 1

#### 4.3.5 Formula 1

One Formula 1 race (British Grand Prix) was captured as it was broadcast in its entirety on Channel 4 on 8<sup>th</sup> July 2018. This provided 170 minutes of footage.

No references to gambling marketing were recorded across the entire broadcast including commercial breaks.

### 4.4 Summary of Key Findings

This analysis of sport sponsorship found gambling marketing references in all but one of the broadcasts analysed (Formula 1), although the frequency and extent of exposure varied between broadcasts. For example, televised boxing had the most frequent references to gambling with, on average, one appearing every 13 seconds. This is in contrast to televised tennis, where a gambling reference only occurred approximately once every nine minutes (545 seconds).

We found a high volume of gambling marketing in UK televised broadcasts of boxing and football. Notably, both of these sports had high profile gambling brands either sponsoring individual teams or the competition itself. For example, William Hill featured heavily in the boxing broadcast due to their position as the official sponsor of the event. Similarly, gambling brands such as Betway and M88 featured heavily in the televised English Premier League games because they sponsored the teams that played in the recorded matches (West Ham

United and Bournemouth respectively). Televised matches which featured two teams sponsored by gambling brands each featured over 900 references per broadcast (Rangers versus Celtic and Bournemouth versus Crystal Palace). The most popular format of references in both these games was branded merchandise (including shirt sponsorship), which accounted for 49% of references in the Rangers v Celtic match and 38% of references in the Bournemouth v Crystal Palace match. This demonstrates how highly visible shirt sponsorship can be in promoting gambling brands in televised football.

Across the televised football broadcasts, there were difference between the very high number of references found in televised English (667 and 974 total references per game) and Scottish Premier League matches (920 total references per game) compared to televised international (9 references) and Champions League (25 references) matches. Again, this would appear to be due to the lack of an official gambling sponsor for these competitions and the teams involved in the recorded broadcasts. Moreover, the Rugby Union game between Scotland and England was part of the Six Nations tournament which does not have an official gambling brand sponsor. This was also the case with the French Open tennis tournament and British Grand Prix Formula 1 race. Compared to football matches broadcast on television, the football match broadcast on the radio also featured fewer gambling references. This is likely because the format is only auditory, and thus did not permit exposure to visual marketing such as branded shirts or pitchside borders.

As found in our content analysis of gambling advertising (Chapter 3), there were few examples of age restriction and consumer protection messages. Even when presented, these were mostly confined to commercial advertising breaks or sponsorship lead ins. In boxing, rugby and televised football, 3% or fewer of the gambling references recorded had a consumer protection or an age restriction message.

Televised football broadcasts featured the greatest variety in the format and location of references. Sponsorship deals include shirt sponsorship, pitch-side advertising and a presence in the teams' dug-outs and on post-match interview boards. Across all sports, almost all references depicted brand logos or names, thus allowing for a high level of brand exposure. Sponsoring successful sports teams, individuals or events implicitly associates gambling brands with personal or social success. Future outputs from this study (report 2 due later in 2019) will explore what aspects of gambling sponsorship children, young people, and vulnerable groups find appealing.

## CHAPTER 5: DISCUSSION

We conducted three work packages examining gambling marketing as part of a wider series of studies. The first, a literature review of evidence published since January 2013, examined the existing evidence on gambling marketing. The second was an in-depth content analysis of 'paid-for' gambling advertising from eight media channels. Specifically, it examined the design features, content, topical associations and messages used to appeal to audiences, consumer information and messaging (e.g. age restriction and responsible gambling messages), and messages suggested about gambling behaviour and outcomes. The third study examined gambling sport sponsorship, and comprised an analysis of the frequency and nature of gambling marketing references in 10 professional sporting events broadcast on television or radio in the United Kingdom.

In this final chapter we summarise the key findings, highlight the evidence gaps and potential policy implications for consideration and finish with the strengths and limitations of the study and overall conclusions.

### 5.1 Summary of Key Findings

The literature review, covering gambling marketing research from both the UK and internationally, highlighted the saturation of advertising in sport, especially football. This was through traditional television advertising screened before, during and after a game but also through more subtle forms such as shirt sponsorship and pitch side advertising, which seeped into sports talk shows. Complex financial incentives were a common advertising feature in a variety of forms (sign-up bonuses, refer-a-friend bonuses, refunds, and risk-free bets). This may contribute to the normalisation of gambling in sports culture, where placing a bet when watching a sporting event is a growing and accepted social activity. This was especially apparent in young people who are less aware of the complexity of odds and the associated terms and conditions. The review found limited evidence on the effect of gambling marketing on behaviour which may in part be due to the lack of longitudinal cohort studies to track behaviour change. Also lacking were studies that explored the use of technology as a gambling marketing tool. This is most likely a reflection of the fast rate of change and growth in this market, which research currently lags behind.

The content analysis of gambling advertising highlighted several trends in how content may reach and influence consumers. Concerning potential reach, the findings show that gambling advertising made full use of different 'paid-for' advertising channels in the UK, ranging from print press and television to door drops and e-mail marketing. Consistent with the literature review, increasing brand awareness appeared a key goal of the advertising, through repeated use of logos, slogans, big-brand claims, and links to other marketing. Design and content features frequently and explicitly highlighted the intended gambling behaviour, through calls to action, signposts to play (e.g. "*download the app now*"), and personalised language (e.g. "*You could win big*"). Around over three quarters of adverts had age restriction messages (e.g. "*Over 18s only*") and T&Cs that were rated as having very poor visibility<sup>12</sup>, while around half of adverts had consumer protection messages rated as poor visibility. Advertising also presented complex information about the gambles and associated offers promoted, with the majority of adverts presenting three to four pieces of information. Gambling was presented as an attractive, normal, and positive behaviour, with no mention of negative outcomes. Positive appeal was achieved through catchy slogans, use of music, portrayal of characters representing or appealing to the target audience, and references to real-world sporting events, teams, and sportspersons. Some advertising contained content which is not permitted under existing self-regulatory codes of conduct, including messages which: may appeal to children

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<sup>12</sup> Very poor visibility: less than 10% of advert space

or young people; exploit the susceptibilities of young or other vulnerable groups; suggest that gambling could enhance personal qualities or be linked to personal or social success; or exploit beliefs about luck.

Consistent with the literature review, the frequency analysis of gambling references in sport broadcasts highlighted that some football matches contain a high volume of gambling advertising. Building on earlier research, we also show that this is true for some other sports, such as high-profile boxing matches where, on average, there was a gambling reference every 13 seconds. Frequency of gambling references was related to whether the events, teams or players were sponsored by a gambling brand. For example, televised football matches in which teams had official gambling sponsors, had a higher frequency and volume of references compared to matches where the teams did not (e.g. international and continental competitions). Findings were also consistent with the literature review by demonstrating that shirt sponsorship is a highly visible form of marketing. However, they also highlighted that sport sponsorship activity can comprise a range of sophisticated, subtle, and interacting forms. These include pitch-side advertising, a presence in the teams' dug-outs and on post-match interview boards.

## 5.2 Future Directions for Research and Policy

### **(i) Current approaches to consumer information and messaging are inadequate**

The content analysis study found that age restriction warnings, consumer protection messages, and T&Cs were not always present in advertising and, where present, were of poor or very poor visibility. Such features were often set outside of the main frame of the advert (i.e. separate banners at the foot of adverts) and negatively juxtaposed against more visually and emotionally stimulating advertising content. The sports sponsorship study similarly found that very few gambling references contained information on age restrictions and consumer protection messages. When consumer protection messages were included, the content analysis of paid for advertising reported that the language was strategically ambiguous, with most adverts featuring the message '*When the fun stops, stop*', designed by the Senet Group (a body created by four leading bookmakers and funded by gambling companies). The Gambling Commission, however, have found that only a third of gamblers indicated that they gambled for fun and enjoyment<sup>65</sup>. That the word Fun was often more prominently displayed than all the other words in consumer protection messages suggests that this is a promotional rather than protective message (Figure 5.1). Messaging aimed at reducing the risks associated with gambling should be mandated by regulators and should feature explicit language that pertains directly to the potential negative or punitive effects that may be experienced. To protect all consumers, but particularly young and vulnerable groups, detailed guidance and minimum standards of design should be implemented to ensure that information is presented in a clear and consistent manner across all gambling marketing.



**Figure 5.1: Content showing the ‘When the fun stops, stop’ consumer protection message**

CHELTENHAM FESTIVAL

# Get a £10 free bet on Day One

Simply stake £20 online or with PLUS in shop on the Imperial Cup

*William* HILL

WHEN THE **FUN** STOPS **STOP** BeGambleAware.org 18+

Min. stake of £/€20 on the Imperial Cup. Bet must be placed at odds of 1/2 (1.5) or greater. Win & Each Way Singles Only. Racecard Markets only. Bets placed with a free bet will not qualify to receive a Free Bet. If you Cash In Your Bet you will not qualify to receive a Free Bet. Qualifying bets must be placed between 5:30pm on Fri 9<sup>th</sup> March and the start of the Imperial Cup on Sat 10<sup>th</sup> March to qualify. Receive a free bet of £/€10 to use on any race on Tues 13<sup>th</sup> March at Cheltenham Festival. Free Bet is non-refundable and

**(ii) Gambling adverts provide a high volume of complex information**

The literature review demonstrated that the complexity of information presented in gambling marketing may influence the consumer decision making process, especially for young people. The in-depth content analysis found that most gambling advertising included at least three pieces of information about the gamble, and one-in-five adverts contained six or more pieces of information. This was often a complex combination of information such as odds and suggested wagers, price offers and bonuses, free and matched bets, and opportunities to minimise risk. Often such information needed to be read in conjunction with extensive stipulations and restrictions outlined in the T&Cs which, as previously mentioned, typically had poor or very poor visibility. Consumers were required to process this complex information while simultaneously processing other visually engaging content (for example, portrayals of famous sports people), sometimes accompanied by music. This is likely to place a significant cognitive burden on the audience and could limit their ability to adequately process important information, such as the likelihood of winning or the age restricted nature. It is further likely that challenges in processing may be increased or intensified in young and vulnerable groups. Future research with consumers should examine in detail the effects of this complex cognitive load on gambling-related decision making. Consideration should be given to whether regulatory codes should address the amount and complexity of information communicated in gambling advertising.

**(iii) Advertising and marketing portrayed gambling as an attractive, normal, and positive behaviour, and provided limited representation of negative outcomes**

Across all three work packages marketing portrayed gambling as attractive, normal and positive. Information about the gamble mostly focused on positive outcomes, including enhanced odds, price offers and bonuses, or jackpots and potential prizes. There was limited explicit detail on the factual likelihood of winning, potential losses, complexity of information, or ethical practice about eligibility, restrictions on withdrawing winnings, or discussion of explicit gambling-related harms. Suggestions of negative outcomes, such as gambling being an isolated activity or not winning, were rarely reported. In addition, the detailed content

analysis found several examples of advertising containing content which is supposedly prohibited by existing self-regulations. For fifteen of the seventeen items examined, at least one advert was found to contain content which plausibly contravened the code. Particular concerns centre on the items regarding the exploitation of the susceptibilities, aspirations, incredulity and lack of knowledge of young and vulnerable groups, suggestions that gambling can enhance personal qualities of social success, and appeal to children or young persons. The literature review found similar findings and identified studies highlighting the positive promotion of gambling with gamblers frequently shown as winners.

**(iv) Some gambling adverts may appeal to young people**

Some gambling advertising may have appealed to children and young people, including through design (e.g. graphics and cartoons) and featuring younger people in the adverts. In particular, reference to celebrities, well-known sportspersons, professional sports teams, and real-world tie ins may also resonate with younger audiences. The widespread appeal, for example, of a high-profile footballer, who plays for a popular Premier League football team, and who is taking part in a high-profile Premier League match that day, suggests that appeal cannot realistically be defined in a binary 'does particularly appeal to young people/does not appeal to young people' fashion nor that appeal significantly differs between 16/17 year olds and 18 year olds. More research is needed to understand what aspects of gambling advertising children, young people, and vulnerable groups find appealing, and how they react to features recorded in this study. This would mean that gambling advertising regulation and decisions about what content is acceptable or not is informed by the consumer. The other work packages in the wider study, involving qualitative research and a survey, will respond to this research need.

**(v) A 'whistle-to-whistle' ban on advertising does not account for the many varied ways that sport sponsorship facilitates exposure**

We identified a high volume of gambling marketing in some football (particularly high profile televised matches) and boxing. To address concerns about the impact of gambling marketing, particularly on young children, gambling companies have agreed in principle to a voluntary 'whistle-to-whistle' ban on advertising during live sports<sup>66</sup>. The Industry Group for Responsible Gambling (IGRG), which includes BET365, Ladbrokes and Paddy Power, has stated that they will make changes to the Gambling Industry Code for Socially Responsible Advertising to include a ban on all TV betting adverts during pre-watershed (9pm) live sport, beginning five minutes before the event and ending five minutes after it finishes. It also includes an end to betting adverts on highlights shows and repeated showings of events if they are shown before 9pm and an end to bookmaker sponsorship of pre-watershed sports programmes. However, this voluntary agreement does not include shirt sponsorship or pitch-side advertising. Given that these were found to be the most frequent type and location of gambling marketing for both the football and boxing broadcasts, it is doubtful that this proposal will do much to reduce viewers' exposure to gambling marketing. It is also notable that the proposal will not include any reference to what was coded in this study as 'in-play'. Given that most of the references for televised football, rugby and tennis appeared during this time along with 47% of the boxing references, this would suggest a minimal decrease in marketing exposure. Thus, despite the whistle-to-whistle ban being an important development it would have greater impact for protecting consumers from gambling advertising exposure) if it was extended to include to reflect all forms of gambling marketing in sport.

**(vi) There are gaps in the gambling marketing evidence base**

The literature review highlighted that the content, reach and effect of gambling marketing is under-researched in the UK. The existing evidence base is dominated by work from Australia which, although helpful, may not be transferable to the UK. The review was particularly focused on children, young people and problem gamblers, and noted a lack of published data on other vulnerable groups, such as people living in constrained economic circumstances and people with limited capacity to understand information (two of the three identified vulnerable

groups for this study). The second report from this study will help to address this gap. The literature review also identified a need for longitudinal cohort studies which can move beyond demonstrating associations between gambling marketing and behaviours to providing evidence of causal relationships.

## **5.3 Strengths and Limitations**

### **5.3.1 Literature Review**

Particular strengths of the literature review are: (1) its robust search and screening strategy and inclusion of published and unpublished 'grey' literature, (2) the broad range of research questions it sought to address, which gave insight to the multiple facets of gambling marketing and identified gaps in the evidence base; (3) title and abstract review and data extraction was undertaken by a small team of four researchers using a systematic approach to minimise subjectivity. However, it has limitations. First, although a systematic search was performed it was not a systematic review, which means studies included were taken at 'face value', without an assessment of quality. Second, due to the purpose of the review being to add context to the study and inform the design of research tools, no separate research questions were created specifically for the literature review. This meant that the review informed some of the research questions more than others. Specifically, the evidence base added greater insight to questions 1-5 than for questions 6-8. In addition, due to the research questions being pre-specified we did not search for the influence of gambling marketing on gender, which as previous studies have shown is an important factor in gambling behaviour<sup>67-69</sup>. Third is the degree of transferability of international findings to the UK context. Gambling marketing occurs in many jurisdictions. The gambling marketing literature is similarly international, with studies in this review coming from Australia, Canada, Ethiopia, Germany, Norway, Spain, Sweden, and the UK. The potential for cross-cultural differences may weaken the ability to draw strong inferences on the effects of gambling marketing in a UK context. Gamblers' preferences, and gambling marketing, might differ between countries, making it potentially harder to draw conclusions when comparing findings. For example, the national sport in the UK is football, whereas in Australia "Aussie rules" football and rugby are watched more frequently. However, because we are interested in the advertising strategies of the gambling industry as well as the impacts of such advertising on individuals, we feel that the findings from different jurisdictions are highly relevant and informative.

### **5.3.2 Content Analysis**

There are several key strengths to content analysis. The large sample includes a variety of 'paid-for' advertising formats, including those with little or no coverage in existing research (e.g. e-mail, direct mail, door drops, and outdoor advertising). This ensures that the findings can be generalised across advertising formats and is, to our knowledge, the first UK study to conduct this type of analysis. Although only a small number of creatives were included from some 'paid-for' channels, our sample was stratified to be representative of where gambling advertising appeared in the weeks selected. As such, low representation – for example only two outdoor adverts and only three creatives each from door drops and direct mail – is reflective of the UK's gambling advertising environment. Future research may wish to purposively sample certain paid-for advertising channels which remain under-researched to provide in-depth case studies (e.g. billboards and e-mail media).

The sample includes a range of gambling formats, including those not previously researched in the UK. As such, this is one of the first studies to provide insight that is generalisable across different sectors of the gambling market. This includes bookmakers, casino and card games,

lotteries, and football pools. Although some forms of gambling only represented a small proportion of the sample, the creatives chosen from each advertising channel were randomly selected. This meant that each creative had an equal probability of inclusion. The low representation of some forms of gambling is therefore reflective of the advertising context for gambling in the UK, for example the high spend on advertising by bookmakers compared to lotteries. Future research may wish to purposively sample certain forms of gambling that remain under-researched in the UK to provide in-depth case studies.

The codebook designed for this study was robustly developed using real-world examples of gambling advertising and extant literature and was piloted on the sample of advertising which demonstrated high inter-rater reliability between the analysts. The content provides a comprehensive and unique insight into gambling advertising practice from several different perspectives. This includes format and placement, design features and content used to appeal, the extent of consumer information and messaging, what information is suggested about the gamble, and what messages are suggested about gambling behaviour and outcomes. The codebook also employs a mixed-methods approach, and therefore provides both quantitative and generalisable estimates of advertising strategies and also qualitative and illustrative insights into how marketing activities are used in practice.

Concerning limitations, all gambling advertising was sampled from March 2018 and, for most channels, from only two weeks in that month. As intended, one week was chosen to represent high-intensity gambling advertising (based on weekly advertising spend) and an adjoining week was selected to represent average intensity of gambling advertising activity. Unsurprisingly, however, the weeks coincided with nationally significant sporting events in the UK, thus increasing the frequency and volume of advertising bookmakers and sports betting. This includes, but is not limited to, UEFA Champions League and Europa League football, FA Cup quarter final matches, top-flight and national league football in Scotland, England and across Europe, The Cheltenham horse race festival; the Winter Olympics; the Six Nations Rugby Union Championship, and the Rugby League Challenge Cup. As such, the advertising selected may not be comparable to alternative points in the year. It is possible that a greater proportion of adverts for casino or card games and online bingo may have been included if advertising was sampled from a period associated with lower sporting activity (i.e. outside of the football season). It was not feasible to analyse two separate periods of the year in this study, and comparative studies to different points in the year remain an avenue for future research.

Many codebook items were based on factual features, such as the presence of brand logos or slogans. Coding for some items, however, is open to subjective interpretation. In particular, messages about gambling behaviour and outcomes may have alternative interpretations among different demographic groups. For example, as both of the main study coders were male, it is possible that there may have been some variation in how such messages may have been perceived and coded by a female audience. These potential differences in interpretation highlight a potential weakness of the existing self-regulatory processes on which this part of the codebook is based<sup>70</sup>. Several steps were taken to mitigate any bias from researcher subjective interpretation. The codebook was developed by researchers with varied skills and experience to ensure cultural and topical comprehension (including in both male and female researchers). The codebook was also subject to an inter-rater reliability test to ensure consistency. Any discrepancies were resolved prior to the main coding and, where relevant, new issues which arose during the study were discussed and adverts retrospectively recoded (if necessary) to ensure consistency. For the items in which subjective interpretation was a significant risk, the codes were also altered from Yes/No/Don't know to 'Plausible evidence' and 'No plausible evidence', and thus they are not intended to suggest the presence of a message as a definitive fact. Finally, throughout the results explicit examples of advertising content are provided to substantiate where such messages are considered plausible.



Finally, this content analysis only provides insight into the content of marketing. Any suggestions of whether, or how, such content impacts on consumer behaviour remain prospective and a key area for future investigation. For example, although the study highlights that the majority of age restriction warnings, consumer protection messages, and T&Cs had very poor visibility, it cannot be determined to what extent (if at all) these are still considered noticeable and effective to consumers. Moreover, although the content analysis highlights that advertising contains content which may appeal to, or resonate with, young people (e.g. associations with popular sportspersons or teams) consumer research is required to confirm this in the UK. Furthermore, although this content analysis finds that gambling advertising includes a range of information about the gamble, the extent to which the organisation and presentation impacts on the decision making process and cognitive load of a consumer is a key area for consumer research.

### **5.3.3 Sports Sponsorship**

A particular strength of this analysis is the high inter-rater reliability of the coding framework, which indicates that the results are likely to be reliable. A limitation is that findings may not be generalizable to other forms of televised sport. If we take football as an example, the two games which featured the largest number of references both included two teams which had a gambling sponsor on their shirt. However, although this cannot be claimed to be representative of all games in the EPL or SPL, the fact that 9 of the 20 teams in the EPL and 4 of 12 teams in the SPL have gambling sponsors for the season 2018/19 suggests that matches featuring two teams with gambling sponsors on their shirts is not an uncommon occurrence.

## **5.4 Conclusion**

This report has seven main conclusions. First, gambling companies use the full range of 'paid for' advertising channels available to promote a variety of gambling brands and forms of gambling. Second, sport (especially football) is a key conduit for gambling marketing and takes a variety of often subtle forms (e.g. television advertising, shirt sponsorship and pitch side advertising). This could further contribute to the normalisation of gambling, especially for children and young people who are more susceptible to marketing and are not fully aware of the complexity of the bets promoted and the potential impact of gambling related harm. Third, advertising portrays gambling as an attractive, normal, and positive behaviour, and includes some content which may appeal to children and young people. Fourth, consumer information and messages in advertising appears inadequate, with limitations in the visibility of age restrictions, consumer protection messages, and T&Cs. Indeed, gambling advertising contains little to no information regarding negative outcomes (e.g. losses or potential harms). Fifth, gambling marketing increasingly features extensive, and often complex, information about the gamble and associated offers, which could result in misperceptions of potential wins and risk. Sixth, some advertising contained content which is supposedly prohibited by existing self-regulation, particularly messages which exploit the susceptibilities of young or vulnerable groups. Finally, this study has identified a lack of UK evidence examining the content, reach and effect of gambling marketing. There is an urgent need for longitudinal cohort studies to investigate the causal relationship between gambling marketing and gambling behaviour.

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