

**ST ALBANS DIOCESAN SYNOD****16 JUNE 2018****GAMBLING ADVERTISING BRIEFING****Quick facts**

- On average, children were 12 years old when they gambled for the first time.<sup>1</sup> The top three reasons for gambling the first time given by children were ‘I thought it would be exciting’ (41%), ‘to make money’ (40%), ‘I thought it would be fun/entertaining’ (33%).<sup>2</sup>
- 80% of 11-16 year-olds have seen gambling adverts on TV, 70% on social media and 66% on other websites, 10% follow gambling companies on social media
- Among 11-16 year-olds who live with family or household members who gamble, 28% had felt bad as a result of this behaviour at some point during the past 12 months.
- More 11-13 year-olds have gambled in the last week than drunk alcohol, smoked, or taken drugs.<sup>3</sup>
- Children who gamble participate in online gambling most frequently; more than a fifth of young online gamblers (20%) spend their own money on this once a week or more often (compared to 15% in 2016)<sup>4</sup>
- The gambling commission estimates that as many as 25,000 11-16 year-olds could be classed as problem gamblers.

**How is gambling advertising currently regulated?**

The process of regulating gambling advertising is currently formally shared between Ofcom, the ASA, and the CAP.

**Ofcom:** The statutory body which has an obligation to maintain standards in broadcast advertising.<sup>5</sup>

**ASA:** The Advertising Standards Authority, the advertising industry’s self-regulator. Regulates non-broadcast advertising (including online and social media) and co-regulates broadcast advertising with Ofcom.<sup>6</sup>

**CAP:** The Committee of Advertising Practice, sister organisation of the ASA. Writes the codes which regulate advertising.

Three different ‘codes’ govern gambling advertising: the BCAP code for broadcast programmes and advertising, the CAP code for non-broadcast advertising, and the gambling industry’s own code. All have gone through various iterations.

“In summary, the Codes aim to ensure that gambling advertisements do not:

- portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm

<sup>1</sup> <http://live-gamblecom.cloud.contensis.com/PDF/survey-data/Young-People-and-Gambling-2017-Report.pdf> pg. 4

<sup>2</sup> Ibid pg. 29

<sup>3</sup> Ibid pg. 16

<sup>4</sup> Ibid pg. 17

<sup>5</sup> <https://www.ofcom.org.uk/research-and-data/tv-radio-and-on-demand/broadcast-advertising>

<sup>6</sup> <https://www.asa.org.uk/about-asa-and-cap/about-regulation/about-the-asa-and-cap.html>

- exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children, young persons or other vulnerable persons
- suggest that gambling can be a solution to financial concerns
- link gambling to seduction, sexual success or enhanced attractiveness
- be of particular appeal to children or young persons, especially by reflecting or being associated with youth culture
- feature anyone gambling or playing a significant role in the ad if they are under 25 years old (or appear to be under 25)

Adverts that breach the Codes have to be amended or withdrawn. If serious or repeated breaches occur, the ASA can refer advertisers to the Gambling Commission and broadcasters to Ofcom.”<sup>7</sup>

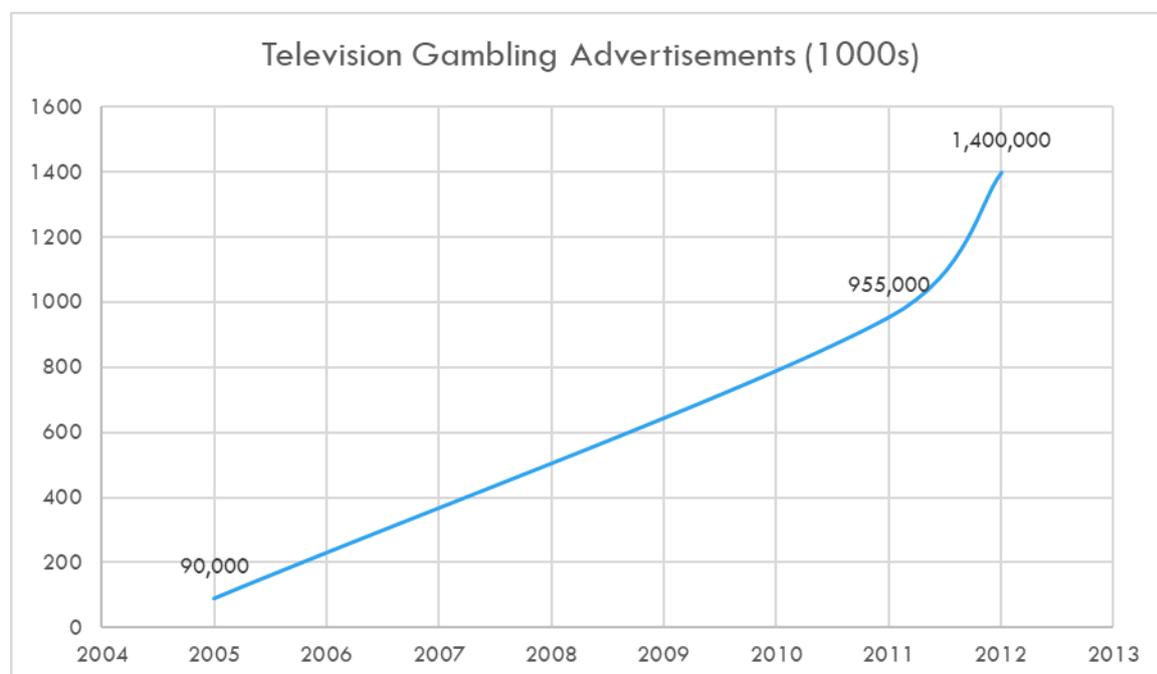
The main elements of the gambling industry’s code, originally published in 2007 (to abate concerns as the Gambling Act 2005 came into force), are:

- the 9pm television watershed for all gambling products except for bingo and sports betting around televised sports events
- the requirement for advertisements to carry information about the Gamble Aware website
- the removal of sponsoring operators’ logos from all children’s merchandise, such as replica football kits<sup>8</sup>

## Areas of Concern

### 1. Levels of gambling advertising

The 2005 Gambling Act was a watershed moment which dramatically de-regulated the UK’s gambling industry. Prior to the introduction of the act, television gambling advertising was strictly restricted to advertising for football pools, bingo and the national lottery.<sup>9</sup> Now all (legal) forms of gambling can be advertised on television. As a result, there has been a ‘boom’ in television advertising since the Act came into force in 2007.



<sup>7</sup> [researchbriefings.files.parliament.uk/documents/CBP-7428/CBP-7428.pdf](https://researchbriefings.files.parliament.uk/documents/CBP-7428/CBP-7428.pdf) pg. 5

<sup>8</sup> *ibid* pg. 6

<sup>9</sup> <https://www.ofcom.org.uk/about-ofcom/latest/media/media-releases/2013/ofcom-publishes-research-on-tv-gambling-adverts>

Significant concerns have been raised around the exceptions in the industry code related to gambling advertising around sport matches. Gambling advertising during football matches in particular is not restricted just to typical broadcast adverts, but advertising appears on players' shirts and signs around the pitch, which is then seen during highlights programmes (like Match of the Day) on stations which do not show commercial adverts during programmes. More adverts for gambling are now seen on football match broadcasts than for unhealthy food or alcohol.<sup>10</sup> Given that before 2005 all of this advertising was banned, this represents a significant change. It is also worth noting that due to the rise of 'catch-up' services, the 9pm watershed may no longer be as potent.

Despite the restrictions in the codes to make gambling adverts less appealing to children, there has undoubtedly been a significant increase number of gambling adverts children see. Ofcom estimates that in 2005 a gambling advert was seen by a child (4-15) on television on half a billion occasions; by 2012 an ad was seen on 1.8 billion occasions, a 360% increase. By 2012, children saw an average of 211 gambling adverts each per year.<sup>11</sup> In addition, 5% of children who choose to gamble for money for the first time reported that they did so because of adverts they had seen.<sup>12</sup> While there has been some suggestion that the rapid increase seen between 2012-2015 has plateaued, this does not account for the parallel increase in the amount of time children spend online, and the gambling advertising they see there.

More children are exposed to gambling advertising online than on posters/billboard or in newspapers.<sup>13</sup> According to research commissioned by the Gambling Commission, among 11-16 year olds who follow gambling companies on social media, 30% had spent their own money on gambling in the last seven days, making them more than three times as likely to have done so as those who do not follow any gambling companies on social media (9%).<sup>14</sup>

## **2. Support for problem gambling**

The government has the option to introduce a mandatory levy on the gambling industry to fund research, education, and treatment. Gambling firms are supposed to voluntarily donate 0.1% of their annual gross gambling yield to GambleAware, the national charity endorsed by the gambling commission. However, not all choose to do. In 2016, "the suggested 0.1% donation would have yielded £13.8m... GambleAware asked for a more modest £10m to fund its nationwide activities but received only £8m."<sup>15</sup>

Last year, GambleAware, "treated 8,000 people struggling with gambling addiction – just 2% of those with a problem."<sup>16</sup> The UK only has one specialist problem gambling clinic. The Gambling Commission supports the introduction of a mandatory levy.

Some have noted that in contrast the statutory (mandatory) levy put on gambling license holders to support horse racing is expected to raise c.£85m in 2017/18, far more than is collected from the voluntary donations.<sup>17</sup>

<sup>10</sup> Cassidy, R., & Ovensen, N. (2017, August 10). Frequency, duration and medium of advertisements for gambling and other risky products in commercial and public service broadcasts of English Premier League football. <http://doi.org/10.17605/OSF.IO/F6BU8>

<sup>11</sup> [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0026/53387/trends\\_in\\_ad\\_activity\\_gambling.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0026/53387/trends_in_ad_activity_gambling.pdf)

<sup>12</sup> <http://live-gamblecom.cloud.contensis.com/PDF/survey-data/Young-People-and-Gambling-2017-Report.pdf> pg. 30

<sup>13</sup> Ibid, pg. 31

<sup>14</sup> Ibid, pg. 32

<sup>15</sup> <https://www.theguardian.com/sport/2017/oct/30/force-gambling-firms-pay-levy-addiction-treatment-charity-gambleaware-betting-companies-donate>

<sup>16</sup> <https://about.gambleaware.org/media/1604/2017-10-31-government-gambling-review.pdf>

As of May 2018, “the Government does not consider introducing a statutory levy [for research, education and treatment] is necessary or appropriate at this stage.”<sup>18</sup>

### **3. Young people and gambling**

Significant concern has been raised that, in light of the ‘boom’ in gambling advertising, significant normalisation of gambling has occurred. Certainly it seems that the effects of a rapid increase in children’s exposure to gambling advertising is unknown. Nonetheless, the Government is currently supporting an advertising campaign aimed at promoting responsible gambling. It seems paradoxical to argue that advertising does not have an affect of behaviour, while sponsoring an advertising campaign.

There is substantial work to do to educate children and young people about gambling, particularly considering the statistic cited in this paper that one of the top reasons children choose to gamble is ‘to make money’. Only 39% of 11-16 year olds report having spoken with their parents about potential problems gambling can lead to. Fewer than a tenth (9%) report having been spoken to by an older brother or sister, and less than a fifth by another family member (18%), or a teacher (18%).<sup>19</sup> Those who report having been spoken to are more likely to regard gambling as dangerous (74% vs 53%).<sup>20</sup>

### **Conclusion**

The gambling environment in the UK is dominated by powerful interests, most notably the gambling industry. The 2005 Gambling Act was a significant moment for regulation, and Government is only starting to get to grips with the consequences of deregulation (perhaps most notoriously the rise of fixed-odds betting terminals). There is room for work to be done in reconstructing a logical, ordered system of gambling regulation in the UK. Gambling addiction has a tremendous social cost, both for those affected, their families, and the wider community. It is incumbent upon the Government, as well as the Church, to protect the vulnerable and advocate for measures which allow individuals to make sensible, freely informed choices about the gambling activities in which they choose to participate.

23 May 2018

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<sup>17</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/707815/Government\\_response\\_to\\_the\\_consultation\\_on\\_proposals\\_for\\_changes\\_to\\_gaming\\_machines\\_and\\_social\\_responsibility\\_measures.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/707815/Government_response_to_the_consultation_on_proposals_for_changes_to_gaming_machines_and_social_responsibility_measures.pdf) pg. 9

<sup>18</sup> Ibid, pg. 50

<sup>19</sup> <http://live-gamblecom.cloud.contensis.com/PDF/survey-data/Young-People-and-Gambling-2017-Report.pdf> pg. 42

<sup>20</sup> Ibid, pg. 42