Ipsos MORI

March 2020

Final Synthesis Report

The effect of gambling marketing and advertising on children, young people and vulnerable adults

Written by Ipsos MORI on behalf of GambleAware

This synthesis report is based on separate research conducted by two independent research consortia. One led by Ipsos MORI (in partnership with University of Bristol, University of Edinburgh, Ebiquity and the Centre for Analysis of Social Media at Demos), and the other by the University of Stirling (in partnership with ScotCen Social Research, University of Glasgow, and University of Warwick).

Contents

List of figures

List of tables

1 Executive Summary

1.1 Background and method

In March 2018, GambleAware commissioned two independent consortia to assess the extent, nature and impact of gambling marketing and advertising on children, young people and vulnerable groups in the UK. The first consortium was led by Ipsos MORI (in partnership with University of Bristol, University of Edinburgh, Ebiquity and the Centre for Analysis of Social Media at Demos), and the second by the University of Stirling (in partnership with ScotCen Social Research, University of Glasgow, and University of Warwick). Each consortium looked at the broad spectrum of gambling marketing and advertising, using different research methods (see Table 1.1 below summarising the different strands of the study). Separate consortium reports have been prepared to give more detail on the work each consortia led and methods used.

Ipsos MORI have written this final synthesis report to explore the effect of gambling advertising on children, young people and vulnerable adults. It draws on data from all nine strands of research carried out as part of this study. In July 2019 Ipsos MORI published an interim synthesis report[1] exploring the exposure, tone and format of gambling related marketing and advertising – it drew on data from all strands minus the survey of children and young people (strand 7).

It should be noted that the key findings, conclusions and recommendations synthesised in both the interim and final synthesis reports represent the views of Ipsos MORI, and do not necessarily represent the views of all the authors who contributed to the research study.

The key objectives of the whole research study were:

1. To explore whether and how gambling marketing and advertising influences children, young people and vulnerable adults' attitudes towards gambling.

2. To examine the tone and content of gambling marketing and advertising across all media, including social media, and to explore the potential impact of these on children, young people and vulnerable adults.

3. To identify specific themes and features of gambling advertising that children, young people and vulnerable adults are particularly susceptible to.

For the purposes of this research children and young people were those aged 11 to 24, and vulnerable adults were defined as people living in constrained economic circumstances, people with limited capacity to understand information, people already experiencing problems with gambling, and people with experience of mental health problems. The research design was purposefully intended to explore beyond current age restrictions of gambling activity in the UK, given that these may change in the future and are different in other jurisdictions.

The research objectives were explored through a multidisciplinary approach. In total there were nine strands to the research; a summary of which is provided below:

[1] https://www.about.gambleaware.org/media/1963/17-067097-01-gambleaware_interim-synthesis-report_080719_final.pdf

Table 1.1: Research strands

Strands	Organisation/(s) responsible	Strand aims
Strand 1 - literature review	University of Stirling	To add context to the study as a whole by reviewing literature from 2013 -2018 identified using pre-specified search terms.
Strand 2 – media Monitoring	Ebiquity Ipsos MORI	To assess volume, frequency and estimated spend associated with traditional gambling-related advertising in the UK from 2015-2018.
Strand 3 – online avatars	Ebiquity Ipsos MORI	To assess volume and frequency of paid-for gambling-related advertising online, including an assessment of whether behavioural targeting is used within the gambling industry, and to explore the likelihood of exposure of children, young people and vulnerable groups.
Strand 4 - social media analysis	Demos Ipsos MORI	To assess volume and frequency of gambling-related advertising and marketing on Twitter. This includes bespoke age-based analysis to assess the extent to which children and young people are part of this online conversation.
Strand 5 - content analysis	University of Stirling University of Bristol	To provide an in-depth analysis of the tone, format and content of gambling-related advertising across a wide range of media both on and offline.
Strand 6 – review of sport sponsorship	University of Stirling	To examine the frequency and nature of gambling references during television and radio broadcasts of sport in the UK.
Strand 7 – quantitative survey of children, young people and young adults	ScotCen Social Research	To provide a nationally representative measure of exposure to and impact of gambling-related advertising among children, young people and young adults.
Strand 8 – qualitative research with children and young people Strand 9 – qualitative research with vulnerable people	Ipsos MORI (conducted in-depth interviews) ScotCen Social Research (conducted focus groups with some additional in-depth interviews)	A combination of focus groups and in-depth interviews to provide a more nuanced understanding of exposure to gambling-related advertising in the context of attitudes, behaviours and circumstances – including frequency of exposure, which tone/format is most engaging, and the potential impact (both immediate and over time).

1.2 Overview of evidence

This section considers the original research questions posed by GambleAware in turn and the evidence gathered to answer each of these.

1.2.1 Where and how often does gambling advertising occur?

There has been a clear increase in the volume of, and spend on, gambling advertising in recent years. Across all media, with the exception of online advertising for which there is limited trend data available, the estimated spend on gambling 'paid for' advertising has steadily increased year on year from £264,657,325 in 2015 to £328,945,916 in 2018. This represents a 24% increase from 2015 to 2018.

The presence of gambling advertising throughout the day is further evident in the media monitoring across TV, radio and Twitter. For example, outside of evening slots, gambling advertising is also prominent in the afternoon on TV and in the morning on radio. Most of the accounts identified on Twitter as promoting gambling sent at least one Tweet between 1am-5am.

Although there are signs that advertising spend and volume is decreasing in some sectors and channels[2] it is also apparent that the adverts captured as part of this study are likely to be an underestimate of the true volume of gambling advertising. The spend estimate excludes marketing that is more difficult to capture, such as window adverts in gambling premises, scratchcard or lottery facilities at the point of sale in shops, content marketing as well as sponsorship of sports teams and leagues, and within sports live TV coverage.

Sport is an important context in which exposure to gambling advertising is likely to occur. This was demonstrated in a number of ways: i) by spikes in spend on gambling advertising within traditional media, and spikes in social media activity across key sporting events (such as Cheltenham Gold Cup and the World Cup), ii) by the compounded rate of exposure to sponsorship whilst watching some live sporting events on TV, and iii) by the prevalence of sports/event betting as the most common form of online advertising within the online avatars' research. However, this association was not universal across all sports at the time of data collection – for example, the sports sponsorship analysis found very few references to gambling within live broadcasting of rugby and tennis sample matches, and no references within Formula 1. However, it is important to note that sponsorship of sports events, teams and individuals is subject to change between and within sports.[3]

Yet, outside of advertising online, sports and event betting has a smaller profile than the advertising of lotteries. Lotteries (including the National Lottery, Postcode Lottery, Health Lottery) were identified as the biggest spenders on advertising across TV, radio, cinema, direct mail, door drops and outdoor media.

The research also identified the rise of advertising of new forms of gambling, in particular eSports.[4] The Centre for Analysis of Social Media at Demos identified 44 accounts which posted a total of 26,573 Tweets relating to gambling in eSports across 2018. Further research is required to establish how many of these accounts are licenced gambling operators, and to establish the context in which people are engaging with this content. Nonetheless, Demos estimated that at least 9,000 people in the UK follow at least one of these accounts.

1.2.2 What are the main themes and features used to market gambling?

Adverts used a range of promotions to elicit an immediate customer response. Common features included time-limited offers, promotion of specific odds, free or matched bets, details of price offers and bonuses, new customer offers, and minimized risk (such as money back in free bets).

Beyond this, the content analysis demonstrated the wide variety of themes and features used to market gambling. This included adverts from gambling companies with no specific gambling reference – particularly on social media where 'content marketing' was widely used to build brand loyalty rather than prompt a specific gamble (for example promoting a discussion about who the best players are in a sports league).

Across both datasets, the content analysis found evidence of a wide range of topical associations used to promote gambling. The most prominent of which was sport, often comprised of specific bets linked to real world events, teams or organisations, or broader discussion of topical debates within a sport. Other common features included the use of

---

[2] for example in a separate study the ASA found that exposure to children on TV had decreased since 2013: https://www.asa.org.uk/resource/children-s-exposure-to-age-restricted-tv-ads.html

[3] It is important to note that sponsorship of sports is constantly evolving. For example, Formula 1 which previously did not have any gambling sponsorship now does so, Formula 1 struck a $100m deal to sell betting sponsorships in September 2018. This research was conducted prior to this in 2018 and therefore this data is based on sporting events that took place during this year. See https://www.bbc.co.uk/sport/formula1/45558975

[4] eSports are multiplayer video games played competitively for spectators, typically by professional gamers.

humour (especially within 'content marketing') and celebrity endorsement. It was less common to advertise jackpots and potential prizes, or feature previous winners or testimonials.

1.2.3 To what extent are children, young people and vulnerable groups exposed to gambling advertising (offline and online)?

Within the data captured, the research found no examples of gambling adverts being placed within children's media, including the most popular children's websites. For example, there were no examples of adverts appearing in children's magazines, or on popular children's websites. Moreover, the most prominent placement of gambling adverts online was found on sites such as Oddschecker, sites used by regular gamblers, which are unlikely to be visited by children. The avatar research did find one example of a sophisticated strategy to target a profile with the traits of a 'Young Person Gambler'; however, it was not clear whether this strategy targeted traits related to gambling or traits related to being a young person.

Nonetheless, an absence of direct targeting did not prohibit exposure to gambling marketing and advertising. Children, young people and vulnerable adults reported what they believed to be high levels of exposure, and spoke of the ubiquitous nature of gambling advertising, across multiple formats, and at different times of the day. The quantitative research conducted by ScotCen as part of this study found that only 4% of 11-24 year olds reported having no exposure to gambling marketing in the last month across the 17 types of gambling marketing listed.

The most common routes for self-reported exposure to gambling advertising were through TV, shops on the high street and social media. This was apparent in both the qualitative and quantitative data (where 85%, 70% and 66% aged 11-24 report seeing ads on TV, in shops and on social media respectively). Exposure on TV was not restricted to the viewing of live sports matches. Participants also shared examples of gambling advertising while watching other genres on demand/catch up, and the sponsorship of daytime TV programmes. Exposure on social media was most likely to be in the form of video adverts while watching clips on YouTube or ads appearing while scrolling through Facebook feeds, with a few reporting following gambling accounts. Exposure to gambling advertising was also frequently noted in betting premises on the high streets, along with promotional window displays, as well as displays for scratchcards and lotteries within other shop windows, on shop floors and near tills. The presence of gambling advertising throughout the day was further evident in the data collected across TV, radio and Twitter.

Evidence of high levels of exposure to gambling marketing was also apparent from high brand awareness and recognition among participants. In the ScotCen survey it was found that on average respondents had heard of more than seven of the ten brands they were asked if they were aware of (mean=7.3) .[5] Across the focus groups, participants correctly identified between 6-9 of the 9 logos they were shown, with an average of 8 logos correctly identified.[6]

There is clear evidence of children following and engaging with gambling related accounts on Twitter. Using an age classifier, it was estimated that 41,000 UK followers of gambling related accounts are likely to be under 16, and that children make up 6% of followers of 'traditional' gambling related accounts - this rises to 17% of accounts focused on eSports gambling. The research also found 13,000 replies to and retweets of gambling content sent from accounts believed to belong to children in the UK.[7]

However, advertising isn't the only route of exposure to gambling brands and gambling activity. Participants across the qualitative strands noted the role of family and friends in introducing them to gambling, often at a young age, and in informal settings. This included picking numbers for the lottery, selecting horses for the Grand National, playing arcade games, and playing bingo on holiday or at school fundraising events. As such, awareness of the different types of gambling activity and brands was closely linked to the attitudes and behaviour of family and friends. This is further

---

[5] These were the ten brands with the greatest advertising spend in the month prior to the survey launch, plus a dummy brand Cogibet to test reliability

[6] Logos shown were from Coral, The Big Lottery, Bet365, Ladbrokes, William Hill, Betfred, Foxy Bingo, Paddy Power and SkyBet.

[7] It is important to note that analysis has not been restricted to analysis of licenced accounts in Great Britain. Some of these accounts therefore may fall out of scope of existing regulation in GB where they are not based in GB and are not directly targeting a GB audience – this is particularly the case within the eSports dataset. Though there is clearly engagement from British users within this dataset, further work is required to explore how and why people are engaging with this content.

supported by the quantitative data, which showed how behaviour and attitudes of peers and family was associated with children and young people's awareness of gambling brands and marketing.

The research identified two possible ways to mitigate the risk of exposure to gambling advertising among children and young people. Firstly, in response to evidence that children under 16 are actively engaging in gambling material on Twitter, more could be done to work closely with social media platforms to improve age screening tools before individuals are allowed to follow accounts that promote gambling. Secondly, betting operators and advertisers could make better use of adtech[8] to positively exclude online browsing profiles that seem likely to be a child. Within the avatar research, there was no evidence to suggest that steps had been taken to restrict exposure to gambling advertising of vulnerable adults and children based on their known browsing history.

1.2.4 What types of adverts are children, young people and vulnerable adults particularly susceptible to?

The findings suggest that appeal of gambling advertising cannot realistically be defined in simplistic binary terms of 'does appeal to young people' or 'does not appeal to young people', or in terms that classify appeal as being significantly different at the point at which children turn 16. To date, definitions of 'particular appeal' have largely focused on the images or language used in ads, and considered the extent to which they could be seen as child-friendly to the point that they would have more appeal to children and young people than they would to adults. The qualitative research did identify some instances of adverts that participants found appealing, including the use of music, colours, characters and celebrities that will have an obvious appeal to children and young people; or the presentation of insider knowledge/skill which was more appealing to high risk gamblers. However, it also demonstrated that children and young people are attracted to a wide range of other features that are not unique to their cohort.

Overall, in alphabetical order, the themes and features of gambling advertising that attracted the attention of children, young people and vulnerable adults who participated in the qualitative research included:[9]

- Celebrity endorsement: was thought to appeal to and attract the celebrity's fans and more widely perceived to make the promotion more authentic, trustworthy and memorable. The choice of celebrity dictated the appeal of the advert; examples of appeal to children and young people included use of sports stars.
- Characters: participants also remembered the characters that were used in marketing campaigns and adverts and suggested that appeal would be tied closely to the character's features. Examples included adverts from Foxy Bingo, Paddy Power, Ladbrokes, Gala Bingo and the National Lottery.
- Colour: all participant groups (children, young people and vulnerable adults) were more attracted to gambling advertising that used bright and engaging colours. This transcended TV, social media, billboards and window displays. Younger participants felt that the use of colour could be particularly appealing to their peers.
- Fun: participants were attracted to advertising which reinforced the fun element of participating in gambling with low risks, or presented taking part as harmless or light hearted.
- Glamour: younger participants were more likely than vulnerable adults to identify with content with perceived high production value that often appeared dramatic, akin to a film. Participants also noticed ads that associated gambling with a glamorous lifestyle, such as dreaming of a big win and using winnings to treat yourself, friends or family.
- Humour: marketing that used humour appealed to all participant groups, and was perceived potentially to have universal appeal to all children and adults. Even where there was no specific call to action to place a bet,

[8] 'Adtech' stands for advertising technology and refers to different types of analytics and digital tools used in the context of advertising. This includes the systems used to direct advertising to individuals and specific target audiences.
[9] The appeal of advertising was assessed by combining the spontaneous submission of adverts that participants to the diary task found had caught their attention, with discussion of different types and features of gambling advertising that were appealing within the focus group and in-depth interviews.

participants reported that humorous ads aided recall, made gambling seem less serious and therefore more acceptable.

- Memorable songs and catchphrases: thought by all participant groups to aid recall of the ad and brand. Participants broadly felt that catchy songs were particularly attractive to young people, some of whom would hum or sing along inadvertently.

- Offers: this included promotion of free bets or spins, deals and boosts in odds. Reduced risks through money back guarantees were also attractive. There was evidence of the latter being particularly appealing to low frequency gamblers or those who hadn't gambled before (including children and young people), and vulnerable adults with financial difficulties.

- 'People like me': in addition to presenting winners from members of the public, participants were also attracted by adverts that used other features to appear personalised, or that gave the reader a sense of ownership. Moreover, social media content that had been shared or liked by friends was assumed to be more relevant and therefore more appealing.

- Skill: ads that used features such as odds boosts or referenced accumulators were seen as particularly attractive to high risk or frequent gamblers. This was apparent in the ads shared by these groups, which appealed to a sense of expertise and knowledge, or sense of community based on a perception of 'skill'.

- Winners: showcasing previous winners was seen to add authenticity, encouraging others to try and replicate success. Vulnerable adults in financial difficulty reported that they felt they were particularly susceptible to these features.

Messages of risk and messages to gamble safely received mixed levels of understanding. Children and young people felt that in theory, gambling could be enjoyable; however, their understanding of risk varied, notably by age, with those under 16 commenting that they did not fully understand how odds worked. They often described risk in overly simplistic terms with some confusion about the chance of winning. Without prompting, there were calls from across all participant groups to better highlight the risks of gambling.

There was some evidence of content or features that could appeal specifically to children and young people. Within the content analysis of traditional media conducted by University of Stirling, there were three features that researchers judged could appeal directly to children and young people: i) language (e.g. 'Starburst', 'House Party'); ii) graphic design (e.g. cartoon-like, colourful); and iii) narratives such as fun, excitement, or 'non-stop' playing. At least one of these features was identified in 11% of creatives. Using a similar distinction, researchers at University of Bristol found a higher prevalence within the Twitter content analysis, where 21% of Traditional Betting Tweets, 59% of eSports Betting Tweets, and 37% of eSports Content Marketing Tweets were judged to contain features that could plausibly appeal directly to children and young people, largely accounted for by the use of images and animations. Examples of this included cartoon or animated style graphics, and features such as popcorn, lucky charms and unicorns, and game-like avatars.[10]

Enticing financial offers are a common feature of gambling advertising, and the qualitative research highlighted that these are likely to attract the attention of some children, young people and vulnerable adults. This includes participants saying that they found these offers personally appealing but also a wider perception that that they would be particularly attractive to those with little awareness or understanding of gambling. The most prevalent of these offers was reference to a 'free' or 'matched' bet, which was contained within 44% of the traditional media content analysis, and 47% of the Twitter

[10] The features judged to be of particular appeal were taken from the CAP definitions of what is of particular appeal to children, so where appropriate, the research has drawn on guidance and advice published in the CAP code and by ASA to inform discussion of key issues relevant to this project. In some cases, the findings highlight cases which plausibly contain content which may not comply with these self-regulations; however, it should be noted that researchers do not seek to provide an assessment of whether any complaint would or would not be upheld. They acknowledge that such a judgement would also be subject to individual interpretation.

content analysis. Other examples include price offers and bonuses, means of minimising risks (for example money back offers), and offers available only to new customers.

Beyond initial appeal (i.e. the extent to which an advert attracts attention, and creates interest in and desire for a product) it is also important to consider potential susceptibility of children, young people and vulnerable adults to the themes and features used in gambling advertising. The content analysis identified three areas of wider concern in this regard: i) lack of any labelling to signal the difference between advertising and general content on Twitter, ii) a lack of emphasis on the risks of gambling and of messages of how to gamble safely; and iii) overly complex terms and conditions particularly where reduced risks or free bets/spins are being promoted.

Some ads may exploit the susceptibility of children, young people and vulnerable adults. Alongside the mixed and often limited understanding of risk identified among participants in the qualitative research, researchers identified a number of features of gambling advertising within the content analysis that may exploit the susceptibilities, aspirations, credulities, inexperience, or lack of knowledge of children, young people and vulnerable adults. This included content that implied limited risk, the overly complicated or potentially misleading presentation of gambles or offers, inflated suggestions of winning, suggesting that gambling was simple, or that the company provided a safeguard to losses. In total 22% of ads within the traditional media content analysis were found to contain at least one of these features; this rose to 37% of adverts within the Twitter dataset using a similar definition.

There was some evidence of encouraging frequent gambling or creating a sense of urgency. The most prominent feature of this was the use of time limited gambles or offers, often driven by reference to a specific sporting event taking place immediately which may be interpreted as creating a sense of immediacy or urgency, encouraging instant action by the consumer. This issue was compounded within the eSports analysis by the fact that many of the global events promoted take place late at night in the UK.

There was little evidence of prominent consumer protection messages that might help raise awareness of the risks of gambling. The presentation of age warnings, promotion of lower-risk gambling, or of terms and conditions was judged to be poor in both traditional media and Twitter datasets analysed as part of this study.

1.2.5 What is the impact?

A wide variety of impacts from gambling advertising and marketing were evident across the research. In support of the modern taxonomies used to describe the way advertising works (see Feldwick 2015, and Vakratsas and Ambler 1999), the qualitative research found evidence (both claimed by participants and observed by researchers during fieldwork) of where gambling advertising had either a direct impact on immediate behaviour, or a more indirect impact on emotional responses that can help shape attitudes to and associations with gambling.

The primary qualitative research found some evidence of individual ads prompting immediate gambling behaviour that had not already been intended or considered by participants. This was most apparent among adults who were current frequent or problem gamblers. However, adverts which encouraged new customers to sign up through special offers did also have appeal to other participant groups. This should perhaps not be a surprise, given that 51% of adverts sampled for the Full Media Deep Dive included a specific call to action. Children and young people tend to report low direct engagement with gambling adverts; yet, the social media analysis points to a small but active group of children and young people engaging with gambling brands online.

Though exposure to advertising didn't always translate into engagement, it did increase awareness. Many participants claimed to be good at ignoring gambling advertising content (particularly those under 18, who felt it wasn't relevant to them) but, the strong performance of all participant groups in the brand awareness and recognition tasks conducted by ScotCen is evidence of the role of exposure in building awareness of gambling and of gambling brands. Participants were often surprised at how well they performed in this task.

Feedback from participants and observations by researchers also identified a wide range of emotional and cognitive responses to gambling advertising and marketing. The claimed and observed impact of these responses was a change in participants' framing of and associations with gambling, rather an immediate desire to gamble. For example, these appeared to normalise gambling behaviour, broaden what constitutes gambling; encouraged people to feel part of a community; a sense of providing an escape, creating trust, and creating misperceptions of risk involved in gambling. These were almost all positive associations. In some instances, these emotional and cognitive responses had an immediate impact on participants framing of and associations with gambling; however, participants also stressed that the impact on attitudes to gambling is likely to be more cumulative over time, as a result of repeated exposure to advertising.

Advanced statistical analysis shows that for young people who did not currently gamble, exposure to advertising was significantly associated with likelihood to gamble in the future, after controlling for demographic and other factors. Those who experienced a greater level of exposure to adverts, those who engaged with marketing activities from gambling operators, and those who had a high level of brand awareness were more likely to be susceptible to gambling in the future.[11] These factors were more significant than the behaviour and attitudes of parents and peers.

The relationship between advertising and current gambling behaviour is multifaceted. Within the statistical analysis, factors which were significantly associated with current gambling included peer gambling, engagement with marketing activities from gambling operators, brand awareness, parental gambling and age. Of these factors, peer gambling had the greatest association with current gambling but engaging with marketing activities from gambling operators and brand awareness were both associated with current gambling behaviour. This does not suggest causation, yet the significance of engagement and brand awareness over pure exposure to gambling advertising overall warrants further investigation. Among those who currently gamble, participants reported that advertising helps remind people of events and of specific odds and opportunities to gamble, in turn helping to reinforce positive association with gambling.

Age was significantly associated with both susceptibility to gamble in the future, and current gambling behaviour; however, significant associations with advertising are independent of age. Having controlled for demographic and other factors within the statistical analysis, it is clear that further significant associations (including differences by exposure and interaction with gambling advertising) are not driven by any underlying differences in age between those aged 11-17 and those aged 18-24.

The attitudes and gambling behaviours of peers and parents are also important in shaping behaviour. Whether or not a close friend or carer gambles, or has favourable attitudes towards gambling, increased an individuals likely exposure to advertising and brands, but was also significantly associated with current gambling among those aged 11-24. For example, those who had a close friend who gambles had six times the odds of being a current gambler than those without. This suggests that changes to advertising practices should be an intrinsic part of a wider policy initiative that also considers the influence of peers and family members in exposure to gambling brands and practices.

1.3 Conclusions and recommendations

1.3.1 Conclusions and discussion

The relationship between advertising and actual gambling behaviour is complex; yet, triangulation of the evidence produced by this research project would suggest that there are reasonable grounds for concern. In the absence of conclusive longitudinal research and wider comparisons, there is a clear link between gambling advertising and the attitudes, current and likely future behaviours of children, young people and vulnerable adults. This is not to say that

[11] All respondents were asked whether they thought that they would spend money on gambling in the next year (this is used as a measure for susceptibility to gamble in the future). Those who were not current gamblers were categorised as being susceptible to gambling within the next year if they selected the answer (definitely yes, probably yes and probably not), and not susceptible if they opted for 'definitely not'. Classifying susceptibility in this way has been used t in previous studies to determine youth susceptibility to consume alcohol and tobacco for example see: Pierce et al, 1996 (https://psycnet.apa.org/record/1996-06101-004), Mutti et al, 2017 (https://academic.oup.com/heapro/article/32/4/650/2950997) and Critchlow et al, 2019 (https://eucam.info/2019/02/20/nathan-critchlow-et-al-2019-participation-with-alcohol-marketing-and-user-created-promotion-on-social-media-and-the-association-with-higher-risk-alcohol-consumption-and-brand-identification-among/)

gambling cannot be enjoyed recreationally at a legal age; however, it is important to note that these are all groups who have already been identified as more likely to experience gambling disorder or be vulnerable to gambling related harms.[12]

The application of the precautionary principle[13] advocates taking preventative measures even if cause and effect relationships are not fully established. Within this context, the research findings of this project suggest that action would be warranted in a number of areas:

- The case for reducing exposure to gambling advertising: exposure to advertising is high across all age groups with gambling advertising predominantly found in public places rather than specifically child-friendly places. This suggests that current rules to restrict exposure have a limited impact, including the '25% rule' aimed at excluding advertising from media with an audience consisting of a 25% or more of children and young people[14]. The research suggests that sheer exposure to gambling advertising can have an impact on attitudes towards the prevalence and acceptability of gambling, and in turn the susceptibility to gamble in the future.[15] Furthermore, the rise of new forms of gambling marketing through social media have increased the ways in which children, young people and vulnerable adults can engage with gambling brands, often innocently, in such a way as to develop brand loyalty.

- The case for reducing the appeal of gambling advertising: rules in place to reduce the appeal of gambling advertising currently assume that there are a set of specific features that children and young people find more appealing than do adults. Current regulations require clarification in areas such as not using sports stars under the age of 25 or child-like images in new sectors such as eSports. However, this research suggests that appeal should be extended to other common features, and particularly adverts that emphasise fun, a sense of reduced risk, and financial reward. Furthermore, these features may play on the susceptibilities of children, young people and vulnerable adults – especially where understanding of risk is poor. The appeal of ads may not always elicit an immediate bet; however, the appeal of adverts is successful in eliciting emotional responses that in turn are likely to shape attitudes to gambling and the chance that an individual will consider gambling in the future.

- The case for improving consumer protection messaging within advertising: the research points to low and mixed understanding and awareness of risk; moreover, participants proactively called for advertising to place greater emphasis on risk (including chance of winning) than on fun and excitement. Only around half (53%) of those aged 11-24 were aware of labelling to indicate that gambling is not legal for under 18s, and even fewer recalled messages about safer gambling. Furthermore, the content analysis demonstrated poor visibility of consumer protection

---

[12] As a result of recommendations from Per Binde's 2014 review, the original specification for the project asked research to focus on key groups of concern: children (aged 11-18), young people (aged 18-24) and vulnerable adults (those living within economic constraints, those with a limited capacity to understand information contained within gambling marketing and advertising and those already experiencing problems with their gambling). The link to the project brief can be found here: https://about.gambleaware.org/media/1538/project-brief-41-advertising-young-and-vulnerable-people.pdf; and to Per Binde's review: https://about.gambleaware.org/media/1165/binde_rgt_report_gambling_advertising_2014_final_color_115p.pdf. Also see Sharman, S, Butler K, & Roberts, A (2019) Psychosocial risk factors in disordered gambling: A descriptive systematic overview of vulnerable populations. Addictive Behaviors, 99

[13] The classic definition of the precautionary principle was established at the 1992 Rio Declaration on Environment and Development. This states that "*Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation*". The principle has more recently been applied to wider public health concerns (for example see Kriebel and Tickner, 'Precautionary Principle and Public Health' September 2001, Vol 91, No.9, American Journal of Public Health, 1351).

[14] The CAP Code contains specific requirements for targeting children and young people. The guidance specifies that *"generally, no medium with an audience that is more than 25% under 16 should be used to advertise HFSS products or lotteries and not more than 25% under 18 for alcohol, gambling and electronic cigarettes"*. (https://www.asa.org.uk/advice-online/children-targeting.html).

[15] In the survey conducted by ScotCen all respondents were asked whether they thought that they would spend money on gambling in the next year – this is used as a measure for 'susceptibility to gamble in the future'. Those who were not current gamblers were categorised as being 'susceptible' to gambling within the next year if they selected the answer (definitely yes, probably yes and probably not), and 'not susceptible' if they opted for 'definitely not'. This approach to classifying susceptibility has also been used previously in relation to youth susceptibility to consume alcohol and tobacco, and is why a similar approach has been taken for this study. Examples of this approach being used in other similar studies are as follows: Pierce et al, 1996 (https://psycnet.apa.org/record/1996-06101-004), Mutti et al, 2017 (https://academic.oup.com/heapro/article/32/4/650/2950997) and Critchlow et al, 2019 (https://eucam.info/2019/02/20/nathan-critchlow-et-al-2019-participation-with-alcohol-marketing-and-user-created-promotion-on-social-media-and-the-association-with-higher-risk-alcohol-consumption-and-brand-identification-among/)

messages across a range of media formats. Greater action is required to identify the best ways to help consumers make more informed judgements when they are exposed to an advert which they find appealing.

- The case for improving wider education initiatives: as a legitimate leisure activity, it is realistic to expect that children, young people and vulnerable adults will be exposed to some form of gambling advertising, marketing or sponsorship (this is currently most evident among sports fans). Continued efforts to improve education relating to gambling and risk are therefore imperative in helping young and vulnerable adults make better informed assessments about whether or not to spend money on gambling. These initiatives[16] should be extended to consider the influence of parents and peers too, who are a key route for exposure to gambling brands and who were strongly associated with current gambling activity among children and young people.

- The case for improving understanding through further research: it is important to note the number of limitations to this study. This is a cross-sectional design which does not benefit from a longitudinal assessment of the impact of exposure to adverts. Given that exposure to adverts was significantly associated with susceptibility to gamble rather than actual gambling behaviour, further insight is needed into the mechanisms and circumstance in which children under 16 sustain and convert any initial interest in gambling into future action. The research would benefit from additional statistical analysis of the relationship between advertising and gambling behaviour among vulnerable adults, and of the relationship between *frequency* of exposure to advertising and current gambling activities. This will help establish the extent to which adverts may or may not be related to problem gambling. Finally, it has not been possible within the scope of this project to fully assess click-through rates relating to online adverts – this may improve understanding of the risk of exposure to ads online, and the appeal of different features.

Based on these findings, Ipsos MORI has identified 18 recommendations for industry, regulators and researchers. These are intended to help stimulate collective discussion and action. We welcome the opportunity for others to build on and to challenge our suggestions. Further discussion and detail is provided in Chapter 8.

It should be noted that these recommendations represent the views of Ipsos MORI, and do not necessarily represent the views of all the authors who contributed to the research study.

1.3.2 Recommendations for gambling, advertising, technology and social media industry

1. Make better use of technology to minimise the risk of children, young people and vulnerable adults' exposure to gambling advertising.

2. Integrate more explicit, more frequent and more visible references to risk and safer gambling within advertising.

3. Consider how best to minimise the risk that adverts in the wider public arena may play on susceptibilities of children, young people and vulnerable adults.

4. Reduce the volume of gambling advertising and marketing reaching children, young people and vulnerable adults.

1.3.3 Recommendations for policy and regulation

5. Establish whether issues identified within the research are due to poor compliance with existing regulations and guidelines, or whether further guidance is needed from regulators, or indeed whether it is time for new regulations.

[16] For example, Demos and the PHSE Association have been working with GambleAware to create a set of materials for use by teachers and youth workers: https://www.begambleaware.org/understanding-gambling/materials-for-teachers-and-youth-workers/.
Materials have also been developed for parents, carers and professionals to support young people to understand the risks of gambling: https://parentzone.org.uk/knowthestakes.

6. Consider whether 'particular appeal' remains a useful definition for protecting children and young people from the potentially harmful impacts of gambling advertising, given that advertising content that appeals to adults may appeal to younger audiences too.
7. Consider whether the '25% rule' remains an appropriate criterion for deciding which gambling ads can be legitimately marketed to a mass audience.
8. Ensure that existing regulations and codes of practice are applied to the licensed eSports betting market as it develops.
9. Maintain careful oversight over unlicensed operators online, particularly in relation to eSports.
10. Consider the potential role and value of education initiatives.

1.3.4 Recommendations for research

11. Establish a longitudinal research project that would allow for a more robust assessment of the impact of advertising on children, young people and vulnerable adults.
12. Establish better benchmarks against which the volume of gambling advertising in the UK, and likely exposure to children, young people and vulnerable adults, can be judged.
13. Commission content analysis on a regular basis.
14. Commission research to better understand the impact of improved visibility of consumer protection messages.
15. Improve understanding of exposure to online advertising, including social media.
16. Explore prevalence of other forms of less featured advertising, including in-app adverts, and notifications.
17. Improve understanding of engagement with eSports advertising on social media.
18. Improve understanding of engagement of online ads relative to other forms of advertising.

2 Introduction

2.1 Project overview

In March 2018, GambleAware commissioned two independent consortia to assess the extent, nature and impact of gambling marketing and advertising on children, young people and vulnerable groups in the UK. The study was designed to build on Per Binde's 2014 critical review of research on gambling advertising.[17] Binde's study highlighted five priority areas for future research: surveying the volume and forms of advertising; content analysis; self-rated impact; self-report studies of perception of advertising; and advertising codes and risk factors for problem gambling. These areas of concern have been addressed as part of this research, providing new evidence and addressing current gaps in our knowledge and understanding of gambling advertising.

The consortia were led by Ipsos MORI (in partnership with University of Bristol, University of Edinburgh, Ebiquity and the Centre for Analysis of Social Media at Demos), and by the University of Stirling (in partnership with ScotCen Social Research, University of Glasgow, and University of Warwick).

The two projects combined sought to address the following objectives:

1. To explore whether and how gambling marketing and advertising influences children and young people's attitudes towards gambling.
2. To 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.
3. To identify specific themes and features of gambling advertising that children, young people and vulnerable people are particularly susceptible to.

These overall research objectives were underpinned by eight research questions:

Format and content

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

Advertising impacts

d. 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?
e. How does the impact of gambling advertising or marketing vary by different media?
f. How does the influence of marketing and advertising compare with other factors, such as parental gambling, parental facilitation, and moral or religious beliefs?

Online advertising and social media

g. 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?
h. 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?

[17] Binde P. 2014. Gambling advertising: A critical research review. 2014. https://about.gambleaware.org/media/1165/binde_rgt_report_gambling_advertising_2014_final_color_115p.pdf

For the purposes of this research children and young people were those aged 11 to 24, and vulnerable adults were defined as people living in constrained economic circumstances, people with limited capacity to understand information, people already experiencing problems with gambling, and people with experience of mental health problems.

The decision to include young adults aged 18-24 was a key part of the original project scope. The research design was purposefully intended to explore beyond current age restrictions of gambling activity in the UK, given that these may change in the future and vary in other jurisdictions. It is also important to consider that cognitive development may be less mature in this age group than in older adults; and that, as this age group has recently reached the legal gambling age, are a key target market for gambling operators.

This report draws together findings from across nine research strands (detailed below), and other relevant studies where appropriate, to discuss the impact of gambling advertising on children, young people and vulnerable adults. An interim report was published for this study in July 2019 which focussed on the questions of exposure, tone and format, providing the context to the analysis of impact in this report.[18] A summary of the key findings from the interim report have been included within the final report to provide full context to the impact of gambling advertising and marketing.

Action taken since the interim synthesis report

- In October 2019 the ASA published a response[19] to the report detailing the work they were doing as a result of the findings. In January 2020 they published a further update[20] on their work in this area.
- The Gambling Commission are doing work to encourage safer advertising online, setting the Advertising Technology challenge.[21]
- In November 2019, the Senet Group introduced a set of safer gambling commitments.[22] One of the key pillars was to work with advertising bodies to explore using adtech to prevent under-18s seeing gambling adverts online.
- Researchers on the study also submitted written evidence to the Select Committee on the Social and Economic Impact of the Gambling Industry.[23]

2.2 Research design

A project of this complexity requires a multidisciplinary approach. This included a quantitative assessment of the volume and frequency of gambling-related advertising, in its many forms, and a measure of exposure to advertising among children, young people and other vulnerable groups. It also included detailed content analysis of the features of advertising and marketing, and the use of qualitative and quantitative techniques, to explore the potential impact this advertising and marketing has on the attitudes and behaviours of children, young people and other vulnerable groups.

To meet the objectives of this research, this project had nine strands, an outline of these is given below.[24] A more detailed outline of each of these strands is provided as an appendix to this report.

---

[18] https://www.about.gambleaware.org/media/1963/17-067097-01-gambleaware_interim-synthesis-report_080719_final.pdf
[19] https://www.asa.org.uk/news/responding-to-gambleaware-s-interim-synthesis-report.html
[20] https://www.asa.org.uk/resource/an-update-on-cap-activities-following-gambleaware-s-interim-synthesis-report.html
[21] https://www.gamblingcommission.gov.uk/news-action-and-statistics/news/gambling-commission-sets-the-industry-tough-challenges-in-race-to-accelerate-progress-to-raise-standards-and-reduce-gambling-harm
[22] https://safergamblingcommitments.co.uk/commitments/commitment-i/
[23] https://www.parliament.uk/business/committees/committees-a-z/lords-select/gambling-committee/publications/
[24] The original project design include scope to consider how best to collect click-through data to ascertain conversion rate and engagement within online gambling-related advertising. After an initial scoping phase, it was decided that this should be considered as part of a separate focussed study to engage directly with advertisers and industry.

2.2.1 Strand 1 - literature review

This literature review was led by the University of Stirling, with the aim of providing an overview of the most relevant literature on gambling advertising in relation to children, young people and vulnerable groups. This review built on Binde's work (2014[25]) by exploring research on gambling marketing from between 2013 and 2018. The review included primary research that related to the study research objectives in the English language, and included any research design, for example, quantitative or qualitative. Findings from the literature review have been published in Current Addiction Reports.[26]

2.2.2 Strand 2 - media monitoring

This strand of the research acted as an exploratory exercise with the aim of identifying where and how often gambling advertising occurs and how much is spent across a variety of media types including press, radio and television. Ipsos MORI conducted this research using Ebiquity's in house advertising database, Portfolio. Portfolio is an advertising research platform, which links advertisements to their placement in the media and the standard spend rate for these advertisements. This data was then crossed with other variables such as region, type of advert, brand and type of gambling.

Analysis consisted of two parts: an overall sector-level analysis of gambling advertising from 2015-2018, as well as a more in-depth analysis (by sub-sector and media type) of the data available from October 2017 to September 2018.

2.2.3 Strand 3 – online avatars

Led by Ebiquity and Ipsos MORI, this provided an assessment of the volume and frequency of paid-for gambling-related advertising online. To achieve this, an 'avatar panel' was generated which consisted of various 'personalities' including children and vulnerable groups. To do this, Ebiquity employed a method known as 'Audience Panel Simulation': this generates users that are referred to as avatars. Each of these avatars had a specific personality. These personalities were developed through normal browsing activity, akin to the behaviours of a real online user. In total, for this research, 11 avatars were generated, which included a child under 13, an adult with a gambling problem and a child under 18 who was a sports fan.

After the avatars had been generated, they were then put 'into field', meaning that they were sent to various websites online and were able to record each of the adverts that they saw. The avatars were in field for 34 days (12 September – 15 October 2018), and visited 150 sites every day. These sites included the top 100 sites, top 20 children's sites, top 20 sports sites, four gambling help sites and two debt finance product sites, and four other help sites for vulnerable audiences.

2.2.4 Strand 4 - social media analysis

Led by Demos and Ipsos MORI, this provided an assessment of the volume and frequency of advertising and marketing on social media related to gambling. This included basic analysis of available Facebook data, and more extensive analysis of Twitter data. Within the Twitter analysis, this further included bespoke age-base analysis to assess the extent to which children and young people were part of this ecosystem. In order to achieve this, Demos collected and analysed: i) 888,000 Tweets sent from 417 gambling related accounts over a 9-month period in 2018; ii) details of the 825,000 followers of these accounts located within the UK; and iii) a total of 1.6 million Tweets sent from the UK which mentioned one of the 417 gambling related accounts by name. To investigate this large dataset, researchers trained a series of algorithmic classifiers to determine, for example, whether a given Tweet mentioned a specific bet, or to estimate the rough age of a follower.

[25] Binde P. 2014. Gambling advertising: A critical research review. 2014.
[26] Newall PWS, Moodie C, Reith G, Stead M, Critchlow N, Morgan A & Dobbie F (2019) Gambling marketing from 2014 to 2018: A literature review [Gambling marketing: A literature review]. Current Addiction Reports. https://doi.org/10.1007/s40429-019-00239-1

2.2.5 Strand 5 - content analysis

Two content analyses were conducted, one led by the University of Stirling and one led by the University of Bristol. Together they provide an in-depth analysis of the tone, format and content of gambling-related advertising across all types of media and consider to what extent (if at all) the content may reach and appeal to children, young people and vulnerable groups. The content analysis codebook used to categorise adverts covered six main areas: i) descriptive information; ii) design features; iii) content in detail; iv) consumer protection information; v) information about the gamble; and vi) messages about gambling behaviour and outcomes.

The University of Stirling carried out a full media deep dive content analysis of paid-for gambling advertising in traditional media. A random sample of 300 creatives were selected from across 5-11 March 2018 and 12-18 March 2018, with adverts drawn from Ebiquity's media monitoring data. These dates were chosen to reflect a week of high intensity (based on advertising expenditure data) and an adjacent week of average intensity. 45 brands were represented in the sample and there was a stratified sample of: 224 x print press; 27 x internet; 22 x TV; 11 x radio; and 16 x email, direct mail, door drops, outdoor.

The Twitter deep dive content analysis was led by the University of Bristol. The data from this was solely from Twitter and made up of four samples: 241 advertising Tweets from bookmakers and tipsters; 181 advertising Tweets from eSports operators advertising from accounts run by organisations and individuals involved in eSports gambling; 191 content marketing Tweets from bookmakers and tipsters; and 190 content marketing Tweets from eSports.[27]

2.2.6 Strand 6 – review of sport sponsorship

The University of Stirling carried out analysis of the frequency and nature of gambling references in televised and radio broadcasts of professional sporting events in the UK. The sample was made up of 10 professional sporting events, recorded as broadcast in the UK on public service (e.g. BBC) and commercial broadcasters (e.g. Sky Sports or BT Sports) in 2018. The sample also included one radio broadcast on a commercial sports radio station (TalkSport).

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.[28] Each gambling reference was coded based on set criteria (e.g. whether it was in play or out of play, what the duration of the reference was).

2.2.7 Strand 7 – quantitative survey of children and young people

Led by ScotCen, strand 7 provides a nationally representative measure of exposure and impact among children and young people. The postal-online-telephone survey was conducted between 21 May 2019 to 13 September 2019, and the sample was made up of previous participants in the Scottish Household Survey (2014-16) or Family Resources Survey (2017), who had given consent to be contacted about further research, and where at least one person aged 11-24 was living in the household. The questionnaire was developed using both questions included in other relevant surveys on gambling, and the impact of alcohol marketing, as well as specifically tailored questions.

In total ScotCen received 1091 completed surveys from 912 households. When adjusting for the likely proportion of households with out of date contact details and the proportion of households with no eligible participants, the approximate household response rate is 33%. As the sample was drawn from two nationally representative surveys, it was possible to weight the respondents to be representative of those aged 11-24 in Britain.

---

[27] It should be noted that this research has not been restricted to accounts that have a British gambling licence. Further research is required to fully understand how and why users engage with the content identified through the research.
[28] Purves RI, Critchlow N., Stead M., Adams J. and Brown K. Alcohol Marketing during the UEFA EURO 2016 Football Tournament: A Frequency Analysis. International Journal of Environmental Research and Public Health. 29; 14(7). 2017.

2.2.8 Strands 8 and 9 – qualitative research with children, young people and vulnerable adults

Led by Ipsos MORI and ScotCen, a combination of focus groups and diary based in-depth interviews were conducted to provide a more nuanced understanding of exposure to gambling-related advertising in the context of other attitudes, behaviours and circumstances – including the frequency of exposure, which tone/format is most engaging, and the potential impact (both immediate and over time).

In total 28 children and young people, aged 11-24, and 32 vulnerable adults were included in the in-depth diary research, conducted by Ipsos MORI. Participants took part in three stages of research to gather evidence to explore the above objectives: i) an initial in-depth face-to-face interview; ii) a four-week diary research task to share examples of gambling advertising they saw during this time; and iii) a follow-up telephone interview to review the diary task.

Within the qualitative research conducted by ScotCen, a total of 83 people participated in either one of 13 focus groups or additional four in-depth interviews, including 62 young people aged 11-24, 13 adults with an experience of mental health problems, and 8 adults with problems with gambling. The definitions of vulnerability used are set out in Table 2.1 below.

Table 2.1: Vulnerable group definitions

Group 1 "people living in constrained economic circumstances"	Group 2 "people with limited capacity to understand information"	Group 3 "people already experiencing gambling problems"	Group 4 "people with experiences of mental health problems"
Ipsos MORI	Ipsos MORI	Ipsos MORI / ScotCen	ScotCen
• Routinely struggle with money / availability of disposable income / low income • People whose economic circumstances have recently changed	• First language is English and have difficulties with comprehension • First language not English and cannot speak English well	• Moderate or high-risk gambling	• Recruited with the support of national and local mental health support organisations

2.3 Notes on interpretation

The following notes should be considered when drawing conclusions from the strands reported in this Final Synthesis Report.

- The literature review is not able to cover all of the unpublished research, nor research published in languages aside from English. Moreover, eSports was not included as a specific search term at the beginning of the project. This later became an important part of the social media analysis and should be considered as an area for future research.

- Similarly, the media monitoring research provides a comprehensive overview of the volume of gambling creatives but it cannot claim to capture every gambling ad distributed. Moreover, within the ads captured, spend is estimated by Ebiquity rather than known (see appendix for further information). The research would also benefit from the ability to compare trends of volume and spend to other similar countries or sectors.

- The purpose of the avatar research was to identify whether the avatar personality had an impact on which adverts they were being shown across all sites. Although designed to provide insight into which adverts each avatar was exposed to, it is acknowledged that browsing behaviour is more fluid and dynamic than can be captured in a pre-set model. Furthermore, it is unlikely that an individual would conduct such an intense amount of online browsing activity as to visit 150 sites every day. Within this research there were no visits to social media sites. Finally, there is no established statistical margins of error for comparing results across avatars – instead identification of whether ad tech was intentionally driving changes in exposure to adverts between avatars used a mixture of quantitative and qualitative analysis.

- Twitter is regularly used by millions of people in the UK, but the platform is not representative of the UK population. By mid-2018, around a fifth of UK adults had accessed Twitter within the last three months (21%).[29] As such, research should be seen as indicative of exposure only on this platform rather than on social media more widely. Furthermore, it should be noted that this strand of research does not encompass the entirety of gambling activity on Twitter. While researchers have taken extensive steps to ensure that the majority of prominent voices along with a breadth of different types of gambling activity are represented in this study, our sample is extensive but not exhaustive. Finally, given that this research aims to take a comprehensive view of Twitter's gambling ecosystem, it is important to note that analysis has not been restricted to analysis of licenced accounts in the UK. Some of these accounts therefore may fall out of scope of existing regulation (as per Gambling Commission remit) where they are not based in Britain and are not directly targeting a British audience – this is particularly the case within the eSports dataset. Though there is clearly engagement from British users within this dataset, further work is required to explore how and why users are engaging with this content.

- The content analysis is reflective of the random samples selected. Guided by the principles of coherence and meaningfulness, reliability and explicitness, and sensitivity to subjectivity, distinctive steps were undertaken to ensure the soundness of the analysis, including inter-coder reliability checks. However, it should be noted that the coding decisions reflect the judgement of researchers at University of Stirling and University of Bristol, not the possible judgments of other interested bodies.

- The qualitative research is intended to be illustrative rather than statistically reliable. Given the qualitative nature of the data collected from the in-depth interviews, mobile app diaries and focus groups, this report aims to provide detailed and exploratory findings that give insight into the experiences, attitudes, circumstances and behaviours of people, rather than statistical evidence from a representative sample. It is not possible in qualitative research to provide a precise or useful indication of the prevalence of a certain view or experience, due to the relatively small number of participants generally involved.

- The quantitative research comprised a postal-online-telephone survey of those aged 11-24 years and achieved an approximate 33% household response rate. As the participants were drawn from the Scottish Household Survey and the Family Resources Survey, it was possible to weight the sample to match the target population profile in terms of age, sex and region. This means the sample, and the survey results, can be considered broadly representative of those aged 11-24 in Britain. However, it was a cross-sectional survey and as a result it is important to note that significant associations, and not causal effects, are reported. Although questions on gambling behaviour were included in the survey, the focus of the study was on the awareness, views and potential impacts of gambling marketing.

2.4 Acknowledgments

The research team at Ipsos MORI would like to thank everyone that has been involved in this project. A project of this scale would not have been possible without the hard work and collaboration of many different people, across several organisations.

From within the Ipsos MORI consortium we would like to thank:

- Agnes Nairn, from the University of Bristol, for her work on the content analysis, for being a critical friend and offering valuable insight throughout the project
- Raffaello Rossi and Jie Shen, also from the University of Bristol, for their work alongside Agnes on the Twitter content analysis

[29] Ipsos MORI Tech Tracker, 2018 https://www.ipsos.com/ipsos-mori/en-uk/2-3-adults-britain-use-social-media

- Kay Tisdall, University of Edinburgh, for her input on the qualitative work, as well as her review of all the outputs of the project
- Josh Smith and colleagues at Demos and the University of Sussex for their work on the Twitter social media analysis, including ground breaking analysis of user age
- Umberto Magrini, Andy Eyles, Mark Compton and Mark Wilson from Ebiquity for their work on the media monitoring and avatar strands
- Amrita Sood, Debra Crush and Julia Pye from Ipsos MORI for their work on the qualitative research and analysis, as well as all those who were part of the fieldwork team
- Yasmin White from Ipsos MORI for the project management of the media monitoring and avatar research strands
- Tom Cooper for his contribution to this final synthesis report

And from the University of Stirling Consortium we would like to thank:

- Fiona Dobbie and Martine Stead, from the University of Stirling, for their role in producing the University of Stirling's research outputs
- Nathan Critchlow (University of Stirling) for his work on the traditional deep dive content analysis and sport sponsorship analysis
- Richard Purves (University of Stirling) for his work on the sports sponsorship analysis
- Crawford Moodie, Richard Purves, Philip Newall (University of Warwick), Gerda Reith (University of Glasgow), Kathryn Angus and Amber Morgan who were contributors to the University of Stirling research and report
- Andy MacGregor, Hannah Biggs and Jessica Shields from ScotCen for their work on the qualitative and quantitative research.

3 Advertising and gambling in context

This chapter provides an overview of the level of gambling activity among children, young people and young adults and of the existing research on gambling and advertising. It draws on data from ScotCen's nationally representative survey of 11-24 year olds conducted as part of this study as well as the Gambling Commission's 2019 report on young people and gambling participation and their 2019 report on gambling participation among adults. This is followed by a discussion of findings from a literature review conducted by University of Stirling, as well as further relevant research that has been published in 2019.

3.1 Key findings

- Four in ten (42%) children and young people aged 11-24 surveyed by ScotCen were identified as current gamblers.[30] This differed by age (23% among those aged 11-17 compared with 60% among those aged 18-24 60%).
- Overall the Gambling Commission's participation data suggests that there has been a long-term downward trend in the number of 11-16 year olds that report participating in gambling activities in the last seven days from 2011 to 2019.
- The ScotCen survey showed that lotteries and bingo are the most popular activities that children and young people aged 11-24 have engaged in.
- The percentage of current gamblers aged 11-24 years old identified in the ScotCen survey as 'high' and 'low' risk gamblers was low (2% and 6% respectively).[31] In the adult population, using the Commission's official health survey rates, 0.5% of people in England were classified as problem gamblers in 2018.
- Among those aged 11-24 who do not currently gamble, four in ten (40%) reported being susceptible to spending money on gambling in the next year.[32]
- There is limited existing evidence in the UK on the impact of gambling advertising. New published research provides some further insights into specific areas (such as Twitter activity around sporting events[33] and physical reactions when viewing gambling advertising[34]); however, there remains little assessment of gambling advertising and marketing as a whole.

[30] Responses ranging from once a month or less to every day were considered to be current gamblers.
[31] Problem gambling among adolescents is commonly measured using the DSM-IV-MR-J 10-item scale. Two items from the DSM-IV-MR-J relating to preoccupation and loss of control were used in the ScotCen survey to give an indication of the risk of problem gambling among current gamblers. The purpose of this was to identify a potential sub-group within the sample of those at higher risk of problem gambling to be used in the analysis, and not to provide a reliable estimate of problem gambling within the population. Further information is included in the methodology summary at the end of the report (section 9.7).
[32] All respondents were asked whether they thought that they would spend money on gambling in the next year (this is used as a measure for susceptibility to gamble in the future). Those who were not current gamblers were categorised as being susceptible to gambling within the next year if they selected the answer (definitely yes, probably yes and probably not), and not susceptible if they opted for 'definitely not'. Classifying susceptibility in this way has been used t in previous studies to determine youth susceptibility to consume alcohol and tobacco for example see: Pierce et al, 1996 (https://psycnet.apa.org/record/1996-06101-004), Mutti et al, 2017 (https://academic.oup.com/heapro/article/32/4/650/2950997) and Critchlow et al, 2019 (https://eucam.info/2019/02/20/nathan-critchlow-et-al-2019-participation-with-alcohol-marketing-and-user-created-promotion-on-social-media-and-the-association-with-higher-risk-alcohol-consumption-and-brand-identification-among/)
[33] A Content Analysis of Gambling Operators' Twitter Accounts at the Start of the English Premier League Football Season: https://doi.org/10.1007/s10899-019-09879-4
[34] Interest in inducements: A psychophysiological study on sports betting advertising: https://doi.org/10.1016/j.ijpsycho.2019.10.015

3.2 Level of gambling activity among children, young people and adults

3.2.1 There is some participation of children and young people in gambling activities, including those under the legal age

Within the qualitative research commissioned as part of the study, there was broad consensus as to the types of activity that constitute gambling. Participants gave many examples of gambling activities, most commonly scratchcards, lotteries, betting on sports such as horse racing, football and boxing either in a betting shop or online, casino games, online games, fruit machines, slot machines and arcade games. Most participants felt that betting amongst friends should be considered as gambling. Only a small number of participants (specifically those aged 13-19 and male) were aware of loot boxes and skin betting – with mixed opinion as to whether these constituted gambling.

There are a range of sources that measure participation in gambling, all of which use different reference points for recent gambling activity. In ScotCen's quantitative survey, four in ten (42%) children and young people (aged 11-24) were identified as current gamblers, meaning they had participated in at least one gambling activity in the last month (shown in Figure 3.1).[35] This participation was significantly higher for those aged 18-24 (60%) compared with those aged 11-17 (23%). The survey found that 51% reported that they had ever spent their own money on a gambling activity. This was higher among young adults aged 18 to 24 (68%) than among children and young people aged 11-17 (33%).[36]

Among 11-16 year olds the Gambling Commission 2019 data reported that 11% have used their own money for gambling in the past 7 days. The Commission's data among this age group showed a long-term downward trend in gambling participation with the 2019 findings suggesting the lowest level of activity since 2011.[37]

The Gambling Commission's data on adult participation in 2019 showed 47% of adults (aged 16+) had participated in at least one form of gambling in the previous four weeks. This is in line with 2018 where this figure was 46%. Both in 2018 and 2019 those in the youngest and oldest age groups had the lowest reported participation levels in gambling. Furthermore, there has been a decline in the number of adults saying they spent money on a gambling activity in the past week since 2015.[38]

---

[35] Respondents were asked how often they took part in gambling activities. Those who reported that they never usually took part in any gambling activities were classified as 'not current gamblers'. All other responses (ranging from once a month or less to every day) were considered to be current gamblers. Respondents did not have to have spent their own money on gambling activities to be classified as current gamblers.

[36] For the Gambling Commission's 2019 young people and gambling participation survey 11-16 year olds are asked if they have used their own money on gambling in the past 7 days, whereas ScotCen's survey asks what age they were when they had first spent their own money on gambling and those who selected any response other than "never" were classed as "ever spending money on gambling" this explains the difference in figures for 11-16 year olds and 11-17 year olds in these two datasets. For the ScotCen survey, data was gathered using a postal-online-telephone method between 21 May 2019 – 13 September 2019, the 1,091 responses were weighted to be nationally representative of those aged 11-24 in GB. The Gambling Commission's young people and gambling participation survey is an online survey conducted in schools, fieldwork was conducted between 12 February – 19 June 2019, data is gathered from a representative sample of 2,943 pupils in years 7 to 11 in GB.

[37] However, caution should be taken when comparing the results over time given the change in the method of data collection (gradually shifting from a paper-based self-completion approach to an online self-completion survey in 2018-2019) and the broadening of the scope of the research incorporating the views of 16 year olds and pupils in Scotland from 2017 onwards). In addition, previously young people were only given three options to report gambling participation; past 7 days, past 12 months and more than 12 months ago. In the current wave, young people were also given the option of the past 4 weeks, which could impact on the proportion of young people who record their gambling in the past 7 days.

[38] https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-participation-in-2019-behaviour-awareness-and-attitudes.pdf

Sources of data on levels of gambling participation

There are a number of different studies that measure current levels of gambling participation (both among young people and adults):

- As part of this study in 2019 ScotCen conducted a representative survey of 11-24 year olds in Great Britain asking questions about current gambling participation as well as opinions on gambling advertising.[39] The survey asks how often they took part in a list of different gambling activities in the last month. Those who reported that they never usually took part in any gambling activities were classified as 'not current gamblers'. All other responses (ranging from once a month or less to every day) were considered to be current gamblers. Respondents did not have to have spent their own money on gambling activities to be classified as current gamblers.
- The Gambling Commission gathers annual representative data on gambling participation among 11-16 year olds in Great Britain, the latest published data is from 2019. This survey asks about gambling participation in the past seven days and also asks some questions on gambling advertising.[40]
- The Commission also released a report on gambling participation among adults (aged 18+) in Great Britain in 2019.[41] This reports on levels of gambling participation within the past month. Official statistics on problem gambling levels among adults come from the Health Survey for England 2018.[42]

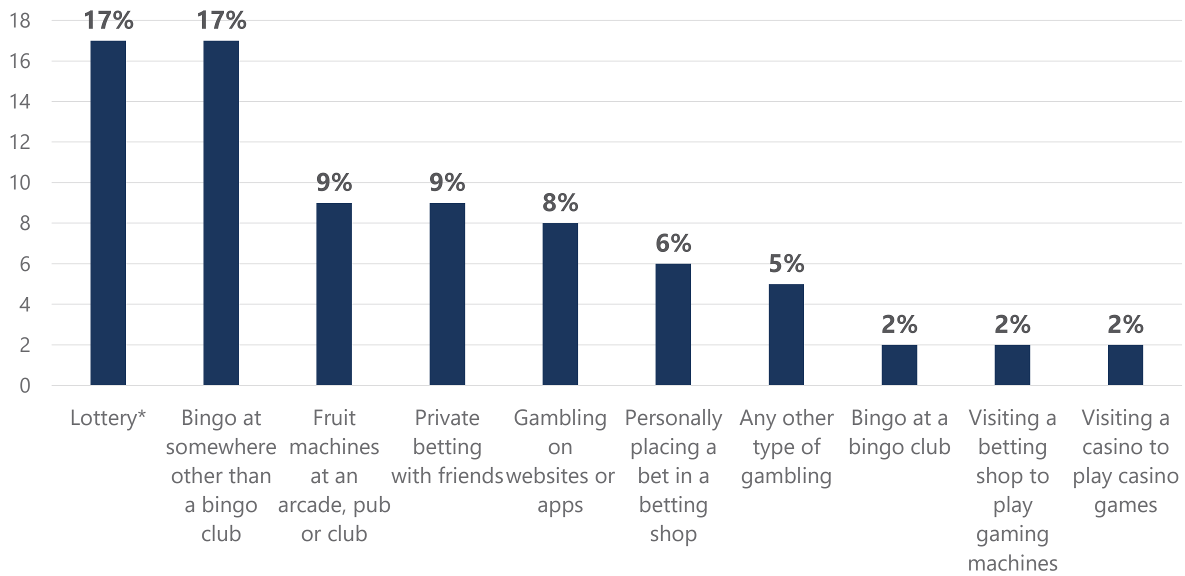
These studies also ask some questions on exposure and interaction with gambling advertising; which are discussed in Chapter 5.

3.2.2 Lotteries and playing bingo were the most common gambling activities children and young people had participated in

The most common activities those aged 11-24 reported spending their own money on, in the past four weeks, were taking part in a lottery (including scratchcards, 17%), playing bingo at somewhere other than a bingo club (17%) and playing fruit machines in an arcade, pub or club (9%).

[39] Further information on the methodology for the ScotCen survey can be found in the methodology summaries at the end of the report (section 9.7)
[40] https://www.gamblingcommission.gov.uk/news-action-and-statistics/Statistics-and-research/Levels-of-participation-and-problem-gambling/Young-persons-survey.aspx
[41] https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-participation-in-2019-behaviour-awareness-and-attitudes.pdf
[42] https://digital.nhs.uk/data-and-information/publications/statistical/health-survey-for-england/2018/health-survey-for-england-2018-supplementary-analysis-on-gambling

Figure 3.1: Percentage of 11-24 year olds who have spent their own money on each gambling activity in the last month (May - July 2019)



Source: ScotCen (weighted base = 1076). *including National Lottery Lotto, Health Lottery, Postcode Lottery, Scratchcards, Euromillions, Thunderball, Hotpicks

The most common activities also differed by age.[43] Due to legal age restrictions we would expect a difference in participation in gambling activities by age, given that many examples (e.g. playing machines in betting shops) are restricted to those aged 18 and over, those playing the lottery have to be aged 16 and over, and some activities such as lower stake fruit machines may have no age limit whatsoever. Fruit machines, which may be age regulated (44%), and non-age restricted activities such as private betting with friends (36%) and playing bingo at somewhere other than a bingo club (18%) were the most commonly reported gambling activities among those aged 11 to 15. This is in line with data gathered by the Gambling Commission on gambling participation among 11-16 year olds which found that the most common gambling activities they took part in in the past seven days were placing a private bet (5%) and fruit machines (4%).

The ScotCen survey found, in the 16 to 17 age group[44], taking part in a lottery (55%) and bingo at somewhere other than a bingo club (55%) were the most commonly reported gambling activities. The proportion of those young adults (aged 18-24)[45] who spent their own money on age-restricted gambling activities such as taking part in a lottery (60%), using a gambling website or app (32%) or visiting a betting shop (18%) was higher than among those who are aged below the legal age limit. This suggests that a large majority of those aged 11-24 were accessing legally appropriate gambling activities, though a minority of those aged under 18 years reported that they had participated in gambling activities illegally, such as playing games on gambling websites.

For adults, the Gambling Commission found the most popular activity in 2019 was the National Lottery draws (30%), followed by lotteries (13%) and scratchcards (10%).

[43] Due to the small numbers of respondents who spent their own money on at least one gambling activity in the last month within each age group, these figures are based on unweighted data and should be interpreted with caution.
[44] unweighted base: n=49
[45] unweighted base: n=182

3.2.3 A small number of current gamblers were identified as being at risk in some way of problem gambling

The ScotCen survey identified 2% of current gamblers as at 'high risk' and 6% at 'low risk' of problem gambling respectively.[46] This represents 1% and 3% respectively when based on the whole sample. Yet, using the full DSM-IV-MR-J scale, the Gambling Commission's 2019 data on young people and gambling participation reports that 1.7% of all 11-16 year olds surveyed are 'problem gamblers' and 2.7% are 'at risk' gamblers.[47]

In the Health survey for England 2018, among adults, 0.5% of people in England were identified as problem gamblers. 2.7% of adults were considered low-risk gamblers, and a further 0.8% were classed as moderate-risk gamblers.[48]

3.2.4 However, four in ten 11-24 year olds who were not current gamblers were seen as being susceptible to gambling in the future

All respondents in the ScotCen survey were asked whether they thought that they would spend money on gambling in the next year. Those who were not current gamblers were categorised as susceptible to gambling within the next year if they selected the answer (definitely yes, probably yes and probably not), and not susceptible if they opted for 'definitely not'. This approach to classifying susceptibility has also been used previously in relation to youth susceptibility to consume alcohol and tobacco, hence why a similar approach has been taken for this study.[49]

40% of those who were not classed as current gamblers reported being susceptible to spending money on gambling in the next year. This did not differ significantly by age.

Table 3.1: Susceptibility to spending money on gambling in the next year by age

	% susceptible to gambling	Weighted base
Total	40.4	567
Age		
11-17	38.2	353
18-24	43.4	203

[46] Problem gambling among adolescents is commonly measured using the DSM-IV-MR-J 10-item scale. Two items from the DSM-IV-MR-J relating to preoccupation and loss of control were used in this survey to give an indication of the risk of problem gambling among current gamblers. The purpose of this was to identify a potential sub-group within the sample of those at higher risk of problem gambling to be used in the analysis, and not to provide a reliable estimate of problem gambling within the population.
[47] The DSM-IV-MR-J screen contains nine components (or questions), The screen questions use frequency scales of 'Never', 'Once or twice', 'Sometimes' or 'Often'. Each respondent scores a point for each of the nine criteria that they met. If the respondent has undertaken four or more of the behaviours/ actions, they receive a score of four or more and they are classified as a 'problem gambler'. A score of two or three points identifies respondents as 'at risk gamblers' and a score of zero or one indicates a 'non-problem gambler'. Further information can be found here: Fisher, S (2000). Developing the DSM-IV Criteria to Identify Adolescent Problem Gambling in Non-Clinical Populations, Journal of Gambling Studies Volume 16 No. 2/3.
[48] https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-participation-in-2019-behaviour-awareness-and-attitudes.pdf
[49] Examples of this approach being used in other similar studies are as follows: Pierce et al, 1996 (https://psycnet.apa.org/record/1996-06101-004), Mutti et al, 2017 (https://academic.oup.com/heapro/article/32/4/650/2950997) and Critchlow et al, 2019 (https://eucam.info/2019/02/20/nathan-critchlow-et-al-2019-participation-with-alcohol-marketing-and-user-created-promotion-on-social-media-and-the-association-with-higher-risk-alcohol-consumption-and-brand-identification-among/)

3.3 Gambling and advertising research

3.3.1 The association between gambling behaviour and the role of advertising has been a growing priority since Per Binde's 2014 review of research in this area

Gaining a better understanding of the links between gambling activity and exposure to advertising has been a key priority in recent years. Per Binde's[50] critical review of research on gambling advertising highlighted the lack of evidence and five key priority areas that should be explored in future research; these areas were: surveying the volume and forms of advertising; content analysis; self-rated impact; self-report studies of perception of advertising; and advertising codes and risk factors for problem gambling.

These areas of concern have been addressed as part of this research, providing new evidence and addressing current gaps in our knowledge and understanding of gambling advertising. This study aims to build on Per Binde's 2014 critical review of research and answer some of these gaps.

3.3.2 There is a limited existing evidence base in the UK on the impact of gambling advertising

The literature review[51] carried out by ISM for this study highlighted the limited existing evidence base in relation to the impact of gambling advertising on children, young people and vulnerable adults. The University of Stirling carried out a thorough search of literature to identify relevant sources that should be consulted as part of the literature review (the dates for inclusion were January 2013 to April 2018). 42 sources were identified that met relevancy criteria and these were included for full data extraction, only 7 of these were from the UK.

The literature review identified a wide variety of ways children and young people could be exposed to gambling advertising, some evidence of the range of advertising strategies utilised and a link with gambling advertising:

1. There was evidence of the variety of ways that children and young people can be exposed to gambling advertising, the most common channels they reported being TV and social media.[52] Alongside this there was also evidence that suggested that there has been an increase in children's exposure to gambling adverts on TV between 2008 and 2017.[53] Although, this number has fallen from a peak in 2013 of 4.4 per week.

2. Evidence showed that gambling companies use a range of advertising strategies and that children, young people and frequent gamblers can be susceptible to these different strategies, as well as specific features of adverts (such as humour or risk free messages).

3. Finally, the evidence highlighted the link between sport and exposure to gambling advertisements.

3.3.3 Further research published within the last year has provided some further insights into specific areas such as Twitter activity around sporting events and physical reactions when viewing gambling advertising

A report[54] was released which conducted a content analysis of 3,375 tweets from the ten largest online sports betting operators during the opening weekend of the English Premier League football season 2018-2019. The research had similar

---

[50] Binde P. 2014. Gambling advertising: A critical research review. 2014. https://about.gambleaware.org/media/1165/binde_rgt_report_gambling_advertising_2014_final_color_115p.pdf

[51] Newall PWS, Moodie C, Reith G, Stead M, Critchlow N, Morgan A & Dobbie F (2019) Gambling marketing from 2014 to 2018: A literature review [Gambling marketing: A literature review]. Current Addiction Reports. https://doi.org/10.1007/s40429-019-00239-1

[52] Young People and Gambling 2018: https://www.gamblingcommission.gov.uk/PDF/survey-data/Young-People-and-Gambling-2018-Report.pdf

[53] Children's Exposure to Age-Restricted TV Ads: https://www.asa.org.uk/resource/children-s-exposure-to-age-restricted-tv-ads.html
BARB data measures exposure in terms of 'impacts' for the audience as a whole and groups within it, e.g. by age category, region or socio-economic status. An impact is an instance of advertising in a chosen category (alcohol, gambling or HFSS) being viewed by the average member of a group, e.g. children aged 4 to 15.

[54] A Content Analysis of Gambling Operators' Twitter Accounts at the Start of the English Premier League Football Season: https://doi.org/10.1007/s10899-019-09879-4

findings to the social media analysis carried out for this study. Tweets collected were often linked to popular sporting events including through hashtags and were often focussed on betting promotions. The tweets used a range of promotional strategies, often focussed on odds advertising, but few contained messages around safer gambling and 90% of tweets contained no safer gambling messaging.

Another study[55] released in Australia monitored eye-tracking and tonic electrodermal (skin conductance) activity whilst 49 gamblers and 10 non-gamblers watched a series of advertisements. The researchers found that advertisements were unlikely to elicit a desire to gamble unless participants had a corresponding interest (reflected in physiological arousal levels). This was despite the offers in gambling advertisements being looked at by most viewers. The research found that for those at risk of problem gambling, exposure to adverts - particularly when they offered options which minimised financial losses, such as through reduced risk or cash back offers - could worsen existing harms. The research also suggested that gamblers were more likely to find bets which they perceived as being a safer betting option and minimised financial losses more appealing. Overall, the findings indicated that the desire to take up inducements is dependent on factors other than just mere exposure to such offers.

These studies provide some further evidence of how much gambling advertising is out there in relation to sports and social media and what effect viewing different gambling adverts can have on people. However, it is important to note that both these studies also have limitations in terms of helping to answer our research questions, as the first is focussed on a specific sporting event and the second is with a small number of participants, and not UK based.

[55] Interest in inducements: A psychophysiological study on sports betting advertising: https://doi.org/10.1016/j.ijpsycho.2019.10.015, published January 2020

4 Evidence of volume

This chapter looks at the volume of gambling advertising, drawing on data from the media monitoring and avatar data collected by Ebiquity, social media analysis by Demos and sport sponsorship analysis by the University of Stirling. A more detailed overview of the volume of gambling advertising can be found in the Interim Synthesis Report.[56]

4.1 Key findings

- Overall, from 2015-2018, there has been a clear increase in the volume and spend (24%) of gambling advertising.
- Lotteries and bookmakers were the top spenders across all types of media, though much of the gambling advertising featured online, including on Twitter, was sports-related.
- Furthermore, there were clear peaks in the amount spent on gambling advertising around sporting events, for example around the World Cup and Cheltenham Gold Cup.
- Individual club and event sponsorship by gambling companies dictated the amount of gambling marketing featured on TV broadcasts.
- Gambling advertising takes place throughout the day, outside of evening slots. It is also prominent in the afternoon on TV and on Twitter, and in the morning on radio.

4.2 Volume of gambling advertising

4.2.1 Overall spend on and volume of advertising has increased across media channels

Analysis by Ebiquity provides insight into the volume of and estimated spend on paid-for gambling advertising. Overall, this analysis has identified a significant increase since 2015, though the narrative differs by channel.

Across all media, with the exception of online advertising (for which there is no long-term trend data available), the estimated spend of gambling 'paid for' advertising has steadily increased year on year from £264,657,325 in 2015 to £328,945,916 in 2018. This is a 24% increase from 2015 to 2018.

Direct mail and online (banner ads, excluding social media) are the only sources where both the volume and estimated spend have decreased from 2017 to 2018. Door Drop mailings fell in 2016 but have been on the rise since then. Press had decreased from 2016-2017 but the amount in 2018 surpassed both 2015 and 2016. Similarly, radio has seen a significant spike in spots and estimated spend between 2017 and 2018. From Ebiquity's data, there is evidence to suggest that the volume of advertising on TV has decreased slightly; however, the spend on TV adverts continues to rise.

[56] https://www.about.gambleaware.org/media/1963/17-067097-01-gambleaware_interim-synthesis-report_080719_final.pdf

Table 4.1: Monitored volume and estimated spend of gambling advertising by media type, (2015-2018)[57]

Type of media		2015	2016	2017	2018
Direct Mail	Estimated number of mailings	3,530,416	7,272,997	13,050,189	8,851,043
	Estimated spend	£1,460,574	£2,874,003	£5,170,271	£3,508,992
Door drops	Estimated number of mailings	59,494,079	53,718,836	92,813,038	121,566,036
	Estimated spend	£22,902,683	£19,019,312	£33,113,960	£40,703,317
Outdoor	Number of individual sites captured	48,053	77,864	83,631	90,614
	Estimated spend	£3,809,586	£5,665,545	£7,233,278	£5,957,479
Press (insertions)	Number of total insertions captured	29,462	35,087	34,245	37,671
	Estimated spend	£60,820,258	£71,475,806	£67,218,993	£72,567,277
Radio (spots)	Number of total spots captured	259,729	294,677	330,113	572,595
	Estimated spend	£4,636,296	£5,594,589	£6,361,846	£12,660,844
TV (spots)	Number of total spots captured	1,607,263	1,715,211	2,190,121	2,136,106
	Estimated spend	£171,027,928	£170,400,826	£177,774,642	£193,548,007
Online (impressions)	Number of total impressions captured	-	-	649,741,454	550,043,291
	Estimated spend	-		£10,831,491	£8,942,818

Data collected by Regulus on behalf of GambleAware presents a similar picture of increased spend on advertising by the gambling sector.[58] Their analysis showed that the total spend by gambling companies on marketing between 2014 and 2017 had gone up by 56%, hitting £1.5 billion. Spend on social media over the same period tripled, and on sponsorship doubled.[59]

Analysis of advert impressions captured through the use of online avatars does not point to universal widespread exposure through paid-for online adverts. In total 2,599 gambling advert impressions were displayed to the avatars over the 34 day data collection period. This was an average of two gambling ads for every 100 site views on desktop, and one for every 100 site views on mobile, which represents 4.3% of all captured ad impressions across all sectors. This appeared

[57] Although it is difficult to compare across channels (as the methods of data capture and estimation of spend are not comparable), it is possible to compare the narrative of trends within the channel over time. It should also be noted, Ebiquity capture the number of placements for radio, TV, and outdoor – not the number of people who are likely to have seen this

[58] Full information of Regulus research can be found here: http://about.gambleaware.org/media/1854/2018-11-24-rp-ga-marketing-sources-and-method-final.pdf

[59] Regulus Partners research includes wider costs such as marketing teams, rather than just the cost of placing an advert. As well as the increases noted above, Regulus found that companies are spending five times more online than on television, with direct online internet marketing costs at £747 million, comprising almost half (48%) of total gambling marketing spend

to be high compared to alcoholic drink adverts (0.18%) and all toilet and cosmetic advertising (2.76%), but low when compared to 'destination' advertising (e.g. nightclubs, museums, theatres, zoos) which made up 7.42%.

4.2.2 Betting advertising was widely shared on Twitter, and points to growth in gambling ads relating to eSports

As part of their analysis of social media, Demos collected and analysed 888,000 Tweets sent from 417 gambling related accounts over a 9-month period in 2018. Of these gambling related accounts, 109 were 'bookmaker' accounts. Each 'bookmaker' account sent out an average of 14 Tweets per day and 60% of these were directly relevant to or advertised gambling.[60] There were also 226 Tipster accounts collected, who tweeted an average of 7 times a day with 67% of these being relevant to gambling or directly promoting gambling.

These Tweets reach a huge number of people - 4.8 million Twitter users followed at least one gambling account and 700,000 of these were likely to be within the UK (9,000 followed eSports accounts).[61]

Table 4.2: Accounts collected and relevant tweets by type

Account type	Accounts	Tweets	Average Tweets per Account	Average Tweets per Account per Day	Tweets relevant to a specific gamble / directly promoting gambling	% Tweets relevant to specific gamble / directly promoting gambling
Total	**417**	**888,745**	**2131**	**9**	**536,339**	**60**
Bookmaker[62]	109	380,388	3490	14	227,114	60
Tipster	226	388,523	1719	7	258,650	67
eSports	44	47,943	1090	4	26,573	55
Other	38	71,891	1892	8	24,002	33

In the dataset of Tweets analysed as part of the research, the most shared Tweet in the dataset was sent not by 'traditional' gambling operators, but by the eSports division of Betway. The Tweet invited users to enter a giveaway to win stickers of popular eSports teams received 26,368 retweets. The second most shared Tweet from PaddyPower received 18,276 retweets.

4.2.3 Gambling advertising takes place throughout the day

Across a range of media there is significant advertising activity throughout the day. Within TV there were nearly as many Daytime spots (12am-4pm) during weekdays as there were during Late Peak (8pm-11pm). There is a constant stream of adverts on radio, with nearly as many running early morning (6am-9.30am) as after 7pm (101,904 vs 125,774).

On Twitter, although most gambling advertising takes place before the evening, peaking at around 4pm, it also continues through the night, with 64% (264) of the accounts analysed by Demos sending at least one Tweet between 1am and 5am. This is partly driven by reference to global sporting events, particular within eSports.

[60] An algorithmic classifier was trained to identify Tweets within the dataset which were directly related to gambling and gambling advertising. These were classed as 'relevant to gambling.'

[61] It is important to note that Demos did not restricted their analysis to GB licensed gambling accounts. Indeed it is likely that the majority of bets advertised be eSports accounts relate to operators without a British licence. Unlicensed accounts are only in scope of existing regulation if their advertising explicitly targets Britain, or if they allow British citizens to place bets. Further research is required to explore how and why users engage with this content, and the extent to which those following eSports are exposed to this content in general; and thus consider the extent to which the advertising (regardless of ability to place a bet) may impact on wider attitudes and behaviours towards gambling in and outside eSports.

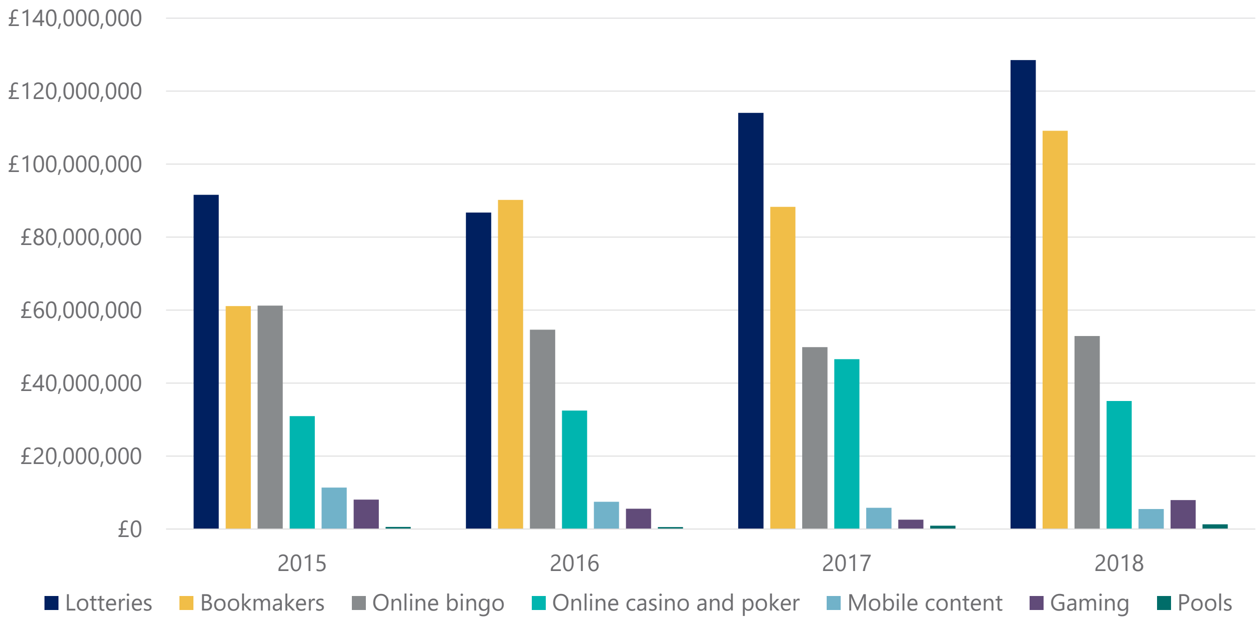
[62] Note that the 'bookmakers' category includes affiliate Tweets that contain links to bookmakers sites

4.2.4 The spend and mode of advertising varied across sectors; bookmakers dominate online, but lotteries were most prominent elsewhere

Over the four years from 2015 to 2018, spend on lotteries, bookmakers, online casino and poker, and pools has increased overall, with lotteries seeing the most significant rise.

Across all traditional media platforms monitored, lottery companies were identified as among the top spenders from October 2017 to September 2018, alongside bookmakers. They were top spenders in TV, Radio, Cinema, Door Drops, Direct Mail and Outdoor, and still amongst the top five spenders in online. In TV, National Lottery outspent the second largest spender by around £10 million, and in radio by £4 million.[63] The highest spend for Lottery was on Door Drops and TV. The fact that Door Drops is amongst the highest spend aligns with evidence from Ebiquity's consumer panel.

Figure 4.1: Estimated spend by sub-sector (2015-2018)[64]



Source: Ebiquity

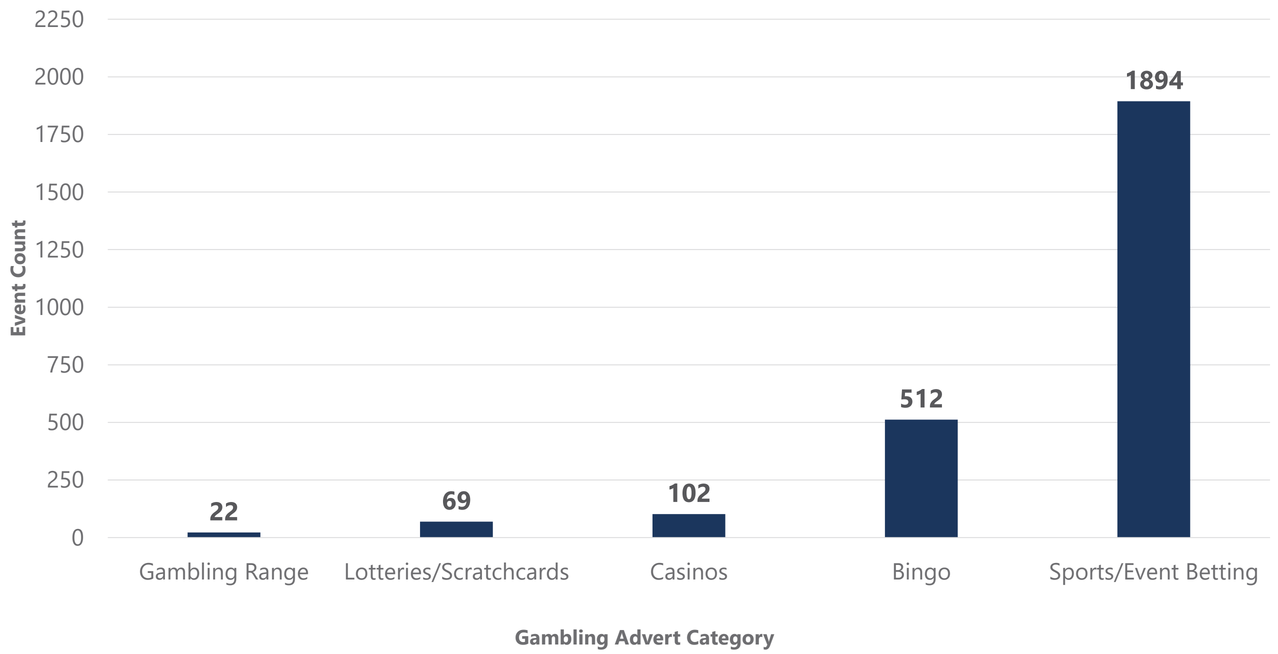
In contrast, bookmakers were the top spenders across the online advertising data captured. Online, bookmakers outspent the other top five spenders by more than double. This supports the findings of the social media analysis and online avatar research, which also found a large volume of bookmakers advertising online. Overall, 73% of adverts shown to the avatars across the 34 day period were sport/event betting related. The main exception being Gala Bingo.[65]

[63] The top 5 spenders on TV during this period, in descending order: National Lottery (£29,077,032), Tombola (£18,201,413), Postcode Lottery (£17,795,911), Bonne Terre (£12,760,669), and Gala Bingo (£9,020,877). And top 5 spenders on radio, in descending order: National Lottery (£5,593,099), Bonne Terre (£1,321,402), Betfair (£768,109), Postcode Lottery (£751,643), and Paddy Power (£642,680)

[64] This research noted a push by the People's Postcode Lottery of mailings prior to the end of the year to encourage people to take up a subscription in the new year or renew their current subscription.

[65] Gala Bingo has a specific targeted ad strategy – serving all its ads to the Young Person 2 / Gambler avatar.

Figure 4.2: Types of gambling adverts shown to avatars (September – October 2018)



Source: Ebiquity

4.2.5 Sports is a key channel for gambling advertising

Patterns in gambling advertising spend are aligned with major sporting events. For example, during the Cheltenham Gold Cup, which was held on Friday 16th March 2018, the estimated press spend peaked to c.£3.2m (compared with c.£1m the following week). Estimated spend by bookmakers also peaked considerably in this week, with the estimated spend on advertising c.£4.6m (compared with c.£1.3m the following week).

On social media, across the 888,000 Tweets analysed from 417 gambling related accounts over the 9-month period, all the top (most engaged with) Tweets referenced sport.

Sponsorship in sports programming is a further route for advertising gambling, and can lead to frequent appearances of gambling adverts during broadcasts. For example, at its most intense, during the boxing match between Tony Bellew and Oleksandr Usvk (11 November 2018) researchers at the University of Stirling found that there was on average one gambling reference every 13 seconds, and similarly across the five football matches analysed as part of this research, there was a reference to gambling on average every 21 seconds.

However, this does vary by sport and by team. For example, during the British Grand Prix on Channel 4 (8 July 2018) there were no gambling adverts recorded across the entire broadcast, including commercial breaks. Tennis likewise has a much lower frequency of gambling adverts, with just one gambling reference recorded every nine minutes during the Men's final of the French Open on ITV (10 June 2018).

Figure 4.3: Examples of gambling adverts from the matches analysed[66] (2018)

[66] Image sources: top left marketing in-play (https://www.liverpoolecho.co.uk/sport/boxing/usyk-vs-bellew-live-updates-15398904; https://www.rt.com/sport/443676-usyk-bellew-world-title/), top centre interview boards (BT Sport and Sky Sports), top right commercial break (Sky Sports), bottom left static pitch side board (BBC One), bottom centre and right sponsorship lead in (ITV 1)

5 Evidence of exposure and engagement

This chapter considers the extent to which children, young people and vulnerable adults are exposed to, and engage with, gambling advertising and marketing. It draws on a wide range of evidence, including the qualitative strand (both the in-depth interviews and focus groups), quantitative strand, social media analysis, and the online avatar research. It also integrates findings from the Gambling Commission's 2019 report on young people and gambling participation.[67]

5.1 Key findings

- Reported exposure to gambling advertising among 11-24 year olds is high. Overall, only four per cent of those surveyed said they had not seen any gambling advertising within the last month, and this did not differ significantly by age.
- Participants in the qualitative research point to the ubiquity of gambling advertising and marketing. This is verified within the survey where on average those aged 11-24 have seen gambling advertising across 6.5 different forms of media over the period of a month.
- Television is the most common route of exposure to gambling advertising across both the qualitative and quantitative data (84% report having seen a gambling advert on television in the survey). Social media and the high street were also key ways to be exposed to gambling advertising.
- Evidence of exposure is also apparent through high brand awareness amongst this age group, with survey research showing that on average respondents aged 11-24 had heard of more than seven of the ten brands listed (mean=7.3).
- Within the data captured, the research found no examples of gambling adverts being placed within children's media, including the most popular children's websites. Moreover, the avatars research found no suggestion that traits specific to children were being purposefully targeted by online gambling ads.
- Researchers identified one example of a sophisticated strategy to target a profile with the traits of a 'Young Person Gambler' aged 18-24; however, it is not clear whether this strategy targeted traits relating to gambling or relating to being a young person.
- Children and young people tend to report low engagement with gambling adverts; however, social media points to a small but active group of children and young people engaging with gambling brands online.
- Advertising isn't the only route to exposure of gambling brands and gambling activity. Participants across the qualitative strands noted the role of family and friends in introducing them to gambling, often at a young age. Supporting this the quantitative data showed how behaviour/attitudes of peers and family was associated with children and young people's awareness of gambling brands and marketing.

5.2 Level of exposure to gambling advertising

5.2.1 Children, young people and vulnerable adults reported high levels of exposure to gambling advertising and marketing

In the in-depth interviews and focus groups all participant groups reported high levels of exposure to gambling advertising. They acknowledged the ubiquitous nature of gambling in the world around them, at all times of day and across multiple formats. For example, they cited the number of betting shops on their high streets or the prompt to purchase scratchcards at the point of purchase in shops.

[67] https://www.gamblingcommission.gov.uk/news-action-and-statistics/Statistics-and-research/Levels-of-participation-and-problem-gambling/Young-persons-survey.aspx

> ***I didn't realise how much is out there - on Facebook and more generally on the internet... It was easy to find gambling adverts to send.***
> *Male, 42, London, Infrequent gambler*
>
> ***I noticed lotto ads everywhere, on TV, outside shops, in the newspaper, all around town. It's advertising so often that I didn't even think it was gambling until this interview. It being all around makes it feel like a normal everyday thing to do.***
> *Rhyl, Female, 20*

High levels of exposure to gambling advertising were also reflected in recent survey data. ScotCen's survey asked children and young people to select all they ways they had been aware of gambling being promoted in the last month from a list of 17 types of gambling marketing exposure (see Table 5.2). Only 4% of 11-24 year olds surveyed reported having no awareness of these types of gambling marketing in this period (6% among those aged 11-17 and 3% aged 18-24).

The Gambling Commission's annual data from 2019 on young people and gambling participation reports a similarly high level of exposure. Seven in ten (69%) 11-16 year olds had ever seen or heard gambling adverts or gambling sponsorships. Furthermore, the Commission's[68] data gathered from adults through their online tracker in 2019 reported that 85% of 18-24 year olds had seen or heard any gambling advert and 80% had seen or heard any gambling sponsorship.

The mean number of types of marketing observed across the ScotCen survey during the previous month was 6.5; this further validates the claims of participants in the qualitative research that pointed to regular exposure across multiple formats. Almost all of those aged 11-24 were aware of gambling marketing in multiple forms, whether they were at the younger end of the spectrum (mean = 5.9 types) or non-gamblers (mean=5.7 types). It is also important to recognise that current gamblers (mean=7.9) and those susceptible to gambling in the coming year (mean=6.8) had a higher level of awareness of gambling marketing.

Table 5.1: Mean awareness of gambling marketing exposure by age, gender, current gambling status and susceptibility to gambling

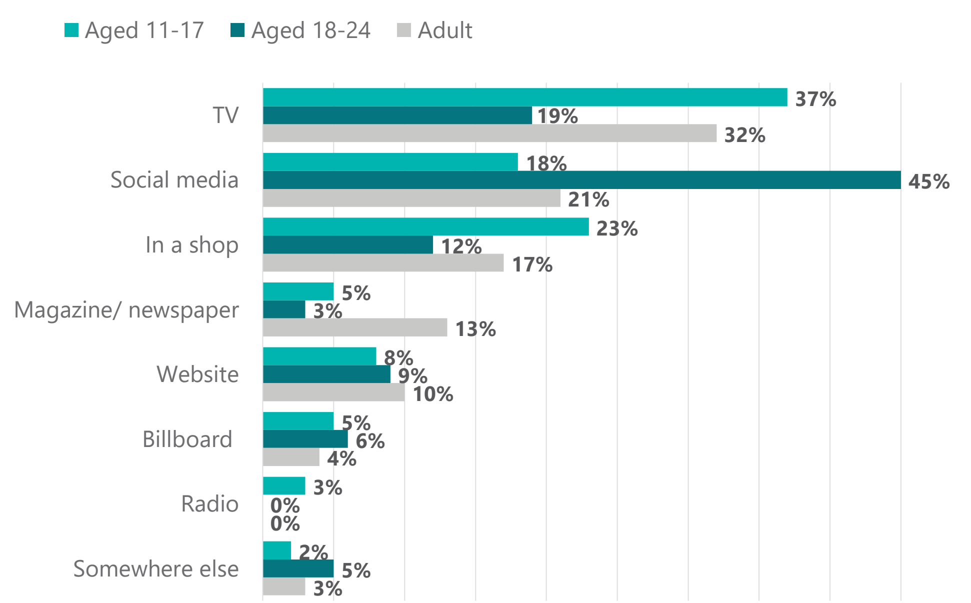
Variable		Mean number of types of advertising seen in last month	Weighted base number
Total	Total	6.5	1056
Gender	Male	7.2	520
	Female	6.0	485
Age	11-17	5.9	487
	18-24	7.3	557
Current Gambling Status	Current gambler	7.9	449
	Not current gambler	5.7	605
Susceptibility to gambling [69]	Susceptible	6.8	227
	Non-susceptible	5.0	321

[68] https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-participation-in-2019-behaviour-awareness-and-attitudes.pdf
[69] Base = all respondents who are not current gamblers. In the survey conducted by ScotCen all respondents were asked whether they thought that they would spend money on gambling in the next year (this is used as a measure for susceptibility to gamble in the future). Those who were not current gamblers were categorised as being susceptible to gambling within the next year if they selected the answer (definitely yes, probably yes and probably not), and not susceptible if they opted for 'definitely not'. This approach to classifying susceptibility has also been used previously in relation to youth susceptibility to consume alcohol and tobacco, and hence why a similar approach has been taken for this study. Examples of this approach being used in other similar studies are as follows: Pierce et al, 1996 (https://psycnet.apa.org/record/1996-06101-004), Mutti et al, 2017 (https://academic.oup.com/heapro/article/32/4/650/2950997) and Critchlow et al, 2019 (https://eucam.info/2019/02/20/nathan-critchlow-et-al-2019-participation-with-alcohol-marketing-and-user-created-promotion-on-social-media-and-the-association-with-higher-risk-alcohol-consumption-and-brand-identification-among/)

5.2.2 Television, the high street and social media were the most common sources of exposure to gambling advertising across both the qualitative and quantitative strands

In the qualitative research the most common sources of exposure to gambling advertising and marketing were television and social media, followed by shops. This was apparent in both the mobile app diary task (as shown in Figure 5.1)[70] and in round table discussion within the focus groups. Exposure to gambling adverts on social media was particularly prevalent among those aged 18-24; more so than on television.

Figure 5.1: Percentage of gambling adverts captured by participant diary exercise over a two-week period



CYP combined %	Overall %
27%	31%
33%	24%
17%	17%
4%	10%
8%	10%
6%	5%
1%	1%
4%	3%

Source: Ipsos MORI, based on 65 mobile app responses from children (aged 11-17), 77 responses from young people (aged 18-24) and 320 responses from adults

A similar picture is evident with the ScotCen survey. The most commonly cited type of marketing that those aged 11-24 were aware of was seeing gambling adverts on television (85%).[71] Seeing adverts in shops, window displays or places in shops where you can gamble was the next most commonly reported (70%), this was followed by adverts on social media (66%).[72]

Exposure to gambling advertising in many forms of media is consistent by age. Broadly similar levels of children and young people aged 11-17 were exposed to adverts in the high street and on billboards, in newspapers, in video games, on social media and online, compared with those aged 18-24. In contrast, exposure is higher among those aged 18-24 in sports events, smartphone apps, merchandise, gambling websites, emails and through word of mouth.

[70] Within the Ipsos MORI qualitative research, participants were asked to share examples of gambling advertising that caught their attention over a two-week period, as part of a month long diary exercise.
[71] Television was also the most common channel cited for seeing gambling advertising in the Gambling Commission's gambling participation data for children, young people and adults
[72] From the Gambling Commission's data we also know that among 11-16 year olds, one in ten (11%) have received gambling related marketing directly. Proportions for different methods of communication are low, but emails about gambling was the most cited method, 4% of young people reported receiving these. Again, boys were more likely than girls to say they received direct marketing (14%, compared with 6%).

Table 5.2: Percentage of 11-24 year olds who had seen each type of gambling marketing in the last month, by age (May - July 2019)

Over the last month, have you seen or heard gambling being promoted in any of the following ways?	Age		Difference[73] (*denotes significant difference)	Total
	11-17	18-24		
Adverts for gambling on television (including online tv)	82	89	-7*	85
Shops, window displays or places in shops where you can gamble (e.g betting shop, or lotteries or scratchcards in newsagents)	67	73	-5	70
Adverts for gambling on social media such as YouTube, Facebook, Twitter and other social media websites	64	69	-5	66
Pop-up adverts for gambling companies on websites	48	57	-9	53
Sports teams, games or events sponsored by a gambling company	45	56	-11*	51
Smartphone apps for gambling companies	34	49	-15*	41
Famous people in films, television or magazines gambling or talking about gambling	36	45	-8	41
Adverts for gambling on billboards or posters in the street	38	38	0	38
Merchandise sponsored by a gambling company (e.g football shirt)	30	43	-14*	37
Adverts for gambling on the radio or through podcasts	34	34	0	34
Websites for gambling companies	25	38	-13*	32
Adverts for gambling in newspapers or magazines (including leaflets)	29	29	0	29
Competitions or prize draws related to gambling companies	26	30	-4	28
Word of mouth from a friend or family member about gambling	14	34	-20*	25
Gambling promoted through a video game or online game	22	22	0	22
Any other sort of gambling marketing	22	22	0	22
E-mails from gambling companies	5	22	-17*	14
None	6	3	3	4
Weighted base	504	563		1079
Unweighted base	669	392		1080

The qualitative diary research shows that exposure to television adverts stretched beyond sport, including other genres on demand/catch up, and from the sponsorship of daytime TV programmes such as Jeremy Kyle, The Chase, I'm a Celebrity, Celebrity Big Brother and Home and Away.[74] When watching sport on TV, particularly football, participants noticed the wide variety of types of marketing, including shirt and team sponsorship, pitch-side ads, and adverts during commercial breaks.

[73] Where percentages do not add up to 100%, this is due to rounding.
[74] Please note qualitative research for this study was conducted in Summer 2018 therefore the research reflects adverts that were in place during this period.

Gambling advertising on social media was noted more by young people than vulnerable adults, but was a key source of exposure across all participant groups. This was most likely to be in the form of video adverts whilst watching clips on YouTube or ads appearing whilst scrolling through Facebook feeds. There was also some exposure to ads for online casino-type games on Snapchat, and a small number of participants followed either brands or tipsters for recommendations and for fun.

Problem gamblers provided a number of examples of where they felt they had been targeted through online advertising, particularly on social media, as a result of their gambling activity.

> ***Well with Facebook and Twitter, when I was opening accounts and had accounts, I was just flooded by it [gambling ads]. If I'd go on my Twitter page and my Facebook page, there'd be a new offer to open an account with a new company, so that'd be constant.***
> *Problem Gambler, Interview 4*

The high street was another common route to exposure of gambling brand and activity. Seeing betting shops or arcades was spontaneously mentioned across the research, with participants arguing that they were more prevalent in less affluent areas. The presence of the shop brand and logo was seen to build brand recognition, and participants noted the window advertising used to prominently display promotions and odds of upcoming events. In addition to gambling venues, participants were also aware of the displays for scratchcards and lotteries within other shop windows, shops floors and tills near the point of sale.

> ***You just walk round the corner…There's four I think it is in a row, all next to each other. There's no other shops. It's just a whole chain of bookmakers competing against one another.***
> *Problem gambler group*

> ***I'd say scratchcards are usually right at the front… so like you say you've done all your shopping, you're gonna get there, you know, especially with someone with maybe a gambling addiction, if they've got that extra money there at that desk, it's like, 'Oh, it's right there!'.***
> *Young Person, aged 14-19*

It was less common for participants to recall seeing adverts online outside of social media; this form of online advertising was often linked to seeing odds whilst engaging with sport content.

Other, less cited sources of gambling advertising and marketing included out of home adverts on billboards and bus stops, door drops through their front door, in newspapers and emails, and ads within mobile phone games for other gambling game apps or offers.

5.2.3 Evidence of high levels of exposure to gambling marketing was also apparent in high brand recognition scores

Exposure to gambling advertising and marketing was further evident within the brand recognition exercise. Across the 10 focus groups conducted with young people by ScotCen, participants named 17 gambling companies unprompted that covered a range of different gambling activities including bingo, casinos, sports gambling and lotteries. ScotCen also tested brand recognition through showing snippets of logos. Participants were often surprised at how well they were able to identify gambling brands from these. Across the groups, participants correctly identified between 6-9 of the logos, with an average of 8 logos correctly identified.

> ***You are always going to know the Ladbrokes. It's like McDonalds, it is always there.***
> *Young Person, aged 16-17*

> ***See I know that's Coral, but I've never ever been to it, use it, I just know it's called Coral. That's bizarre.***
> *Young Person, 19-23*

The survey also assessed brand awareness by asking those aged 11-24 years to select brand names they had seen or heard of from a list of the ten companies[75] plus a dummy brand, Cogibet, to test reliability. On average respondents had heard of more than seven of the ten brands (mean=7.3).

An important finding is the high brand awareness reported by those, for example, who were aged 11-17 (mean=6.5 brands) and had lower levels of gambling marketing awareness (mean=6.2 brands). This suggests, that gambling marketing and branding has been very successful in increasing knowledge and awareness of gambling among 11-24 year olds. It may be argued that respondents may have ticked more brands than they were actually aware of; however, the fact that only 28 individuals (less than 3%) said that they had heard of the 'dummy brand' Cogibet suggests that this is a reliable estimate of the brand awareness of those aged 11-24 years.

As would be expected, brand awareness was highest among those who had engaged with two or more types of gambling marketing in the past month (mean=8.9), and those who had a high level of awareness of gambling advertising (mean=8.7). In addition, those who were current gamblers were able to recall significantly more brands (mean=8.3), as were those who were more susceptible to gambling (mean=7.1), and young men (mean=7.7).[76]

5.2.4 The research found no examples of gambling adverts being placed within children's media

The media monitoring analysis found no examples of gambling advertising spend on children's magazines or television channels. Similarly, online, through the avatar research carried out for this study, there was no suggestion of gambling companies specifically targeting child-like or problem gambling traits[77] within a user browsing history; and no examples of gambling adverts being placed on the top 20 children's sites. The ASA has also carried out research into children's exposure to gambling adverts; avatars created for this visited a much greater number of children sites; it found some instances of gambling ads being placed on children's sites outside of the top 20 sites visited as part of this study.[78]

In terms of the sites where the adverts were viewed by the avatars in this research, the majority were seen on oddschecker.com. Despite there being no evidence to suggest that these important groups were purposefully targeted based on their online profile, if they were to visit sites of this nature then they would be exposed to gambling advertising.

Overall, this suggests that exposure to gambling advertising takes place in public fora where children and young people represent a proportion of a wider adult audience.

5.2.5 However, children were not screened out of being served online gambling adverts

Even though the research for this report did not find evidence of child-like characteristics being directly targeted, it should be noted that children were not screened out of receiving gambling adverts. All avatars in our research were served gambling adverts regardless of their specific personalities (as shown in Figure 5.2).

---

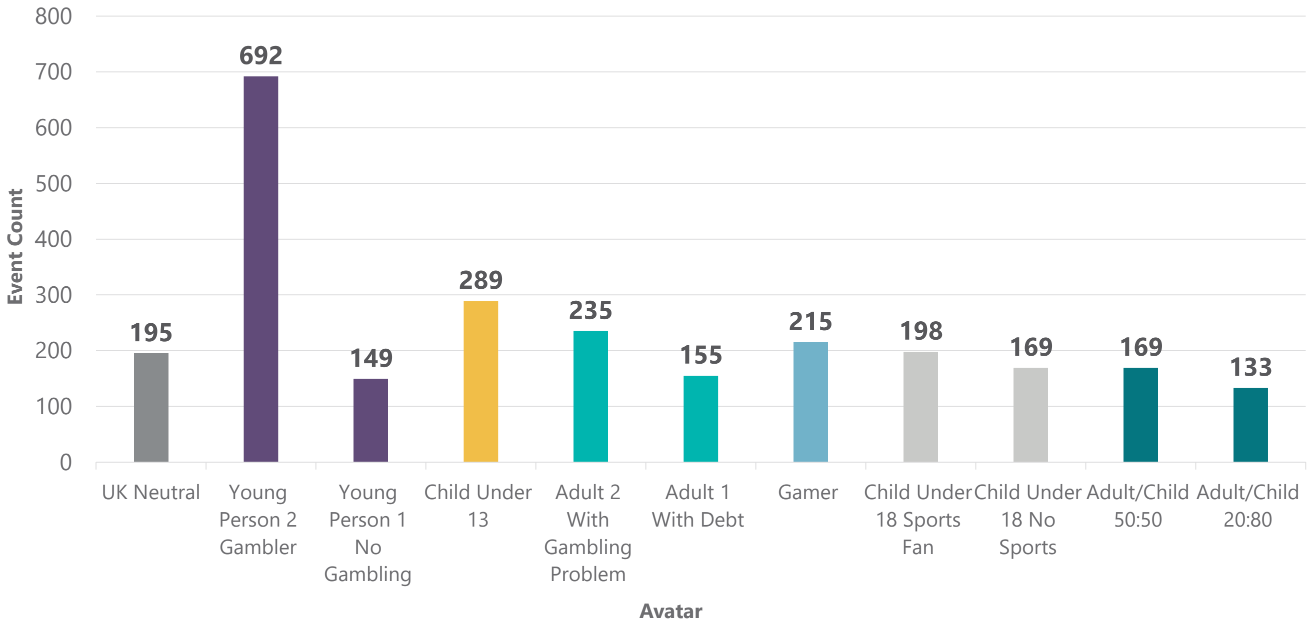
[75] Brands with the greatest advertising spend in the month prior to the survey launch were chosen

[76] Awareness of different types of gambling was also explored for the first time in 2019 Gambling Commission's data gathered on young people and gambling participation. Young people were asked to think back to the last time they had seen a gambling advert (specifically, to remember what the last gambling advert they saw or heard was about and the question included a list of options. It should be noted that the National Lottery Set for Life game was not included, as this was launched in March 2019, when the survey was already in field). Two in five young people (40%) remember the last gambling advert they saw being about a National Lottery draw based game. Slightly fewer (33%) remember the last gambling advert they saw being about a sports event. https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019.pdf

[77] These personalities were developed through normal browsing activity, akin to the behaviours of a real online user. For example, in order to build an avatar that represents a person with financial problems, the avatar could Google search for the following; "Help me with my debt", "How do I take out a loan?" Details on the sites that define each avatar are provided in the methodology summary section at the end of the report.

[78] https://www.asa.org.uk/news/harnessing-new-technology-gambling-ads-children.html

Figure 5.2: Number of gambling ads served by avatar type (September – October 2018)



Source: Ebiquity

The research also identified a small number of clear-cut examples of targeted advertising based on characteristics of their browsing behaviour, illustrating that targeting someone's online characteristics is possible:

1. As shown in Figure 5.2, a high proportion of gambling adverts were served to the Young Person 2 Gambler avatar. Of the 692 advert impressions that the avatar was exposed to, 504 of these were advertised by the GalaBingo brand. No other avatar saw GalaBingo advert impressions, all 504 were shown to this one avatar. This example illustrates that technology can be used to actively avoid certain characteristics (such as being child-like or vulnerable) as well as being used to target them.

2. The research also identified a successful strategy employed by GamBan to target the 'problem gambler' profile. This avatar was consistently exposed to advertising for GamBan, a software that allows for gambling advertising to be blocked online and in apps.[79] GamBan advertising was only shown to this avatar, in total there were 117 advert impressions by GamBan.

5.3 Engagement with marketing activity

5.3.1 Children and young people reported relatively low engagement with gambling advertising

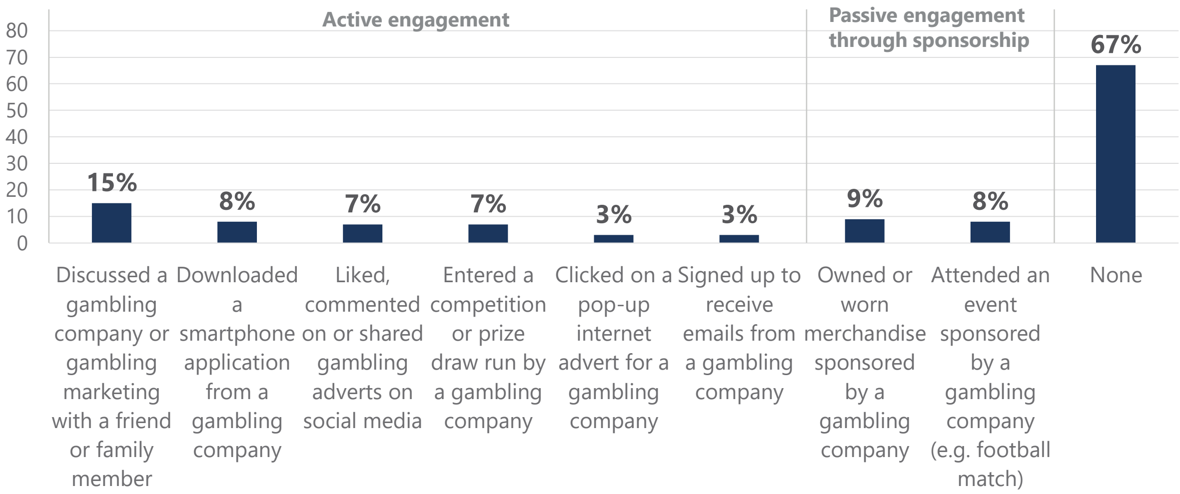
ScotCen's survey of 11-24 year olds asked about different types of engagement with gambling brands. Two thirds (67%) said that they had not engaged with gambling brands and marketing in any way in the previous month. For those who did report engaging with gambling marketing some of these could be seen as more passive engagement relating to sponsorship (as shown Figure 5.3 below), such as owning merchandise sponsored by a gambling company (9%) or attending an event sponsored by gambling (8%). However, participants did also engage actively with gambling marketing. The most common way of doing this was by discussing a gambling company or marketing with a friend or family member (15%). Those aged 11-17 were more likely to say they had not engaged with any gambling advertising in the last month than those aged 18-24 (78% as opposed to 57%).

[79] N.B This is not a gambling company but is a tool designed to block gambling adverts.

On average, those surveyed had engaged with fewer than one of the eight options of engagement listed in the previous month (mean = 0.6).

A relatively small number of respondents said they clicked on a pop-up internet advert for a gambling company (three per cent). This is broadly supported by evidence from the qualitative research, which found few examples of people clicking on internet adverts. Evidence shared by Better Collective[80] as part of this study suggests that further work is required to explore this area in more detail given the complexity and wide range of ways in which online ads are served and ways in which 'click-through' or 'conversion' rates are calculated. For example, Search Engine Optimisation advertising shows ads personalised to the user based on their line of enquiry – it would not be efficient for advertisers to promote gambling content where there was no sign of interest or intent within the query. Further research into conversion rates (rather than click through rates), would help establish the prevalence of users making a gambling purchase or opening an account as a direct result of seeing an advert.

Figure 5.3: Percentage of those aged 11-24 who engaged with each type of gambling marketing in the last month (May - July 2019)[81]



11-17	9	1	3	1	2	0	7	8	78
18-24	21	14	11	11	4	6	12	8	57
diff	-13	-13	-8	-10	-2	-5	-4	+1	+21

Source: ScotCen (weighted base = 1073).

5.3.2 Social media analysis showed that children and young people do engage with gambling content online

Analysis of the social media conversation around gambling showed that children are following and engaging with betting related accounts on Twitter. Using an age classifier[82], it was estimated that 41,000 UK followers of gambling related accounts were likely to be under 16, and that children make up 6% of followers of 'traditional' gambling accounts - this rises to 17% of accounts focused on eSports gambling. The study also identified 13,000 replies to and retweets of gambling content sent from accounts belonging to children in the UK; this suggests a level of active, as opposed to passive engagement with content.

Children and young people also reported connecting with gambling companies on social media. Just over one in ten (12%) young people, surveyed by the Gambling Commission in 2019, report following or watching gambling companies on social media. The most common platform for following gambling companies was YouTube (8%), followed by Instagram

[80] Better collective is a leading iGaming affiliate: https://bettercollective.com/
[81] Where percentages do not add up to 100%, this is due to rounding.
[82] Information on the method used to estimate age can be found in the method summary at the end of this report (section 9.4)

(7%) and Snapchat (6%). Boys were more likely than girls to follow or watch gambling companies on social media (14%, compared with 9%). There were no significant differences by age.

5.4 Role of family and friends

5.4.1 Perceptions of gambling were also shaped by family, friends, interests and habits

The context in which participants were aware of gambling was shaped by more than advertising alone. The majority of participants across the research (including current non-gamblers) referenced repeated exposure to gambling activity from an early age, often in informal settings. This included picking numbers for the lottery, selecting horses for the Grand National, playing arcade games, and playing bingo on holiday or at school fundraising events. As such, awareness of different types of gambling activity and brands was closely linked to the behaviour of family and friends.

> ***I go to bingo with Mum once a month, to meet up with friends for prizes like food, not money. Bingo is a game, not gambling. I used to go to the arcades all the time and do 2p slot machines. I never thought of that as gambling, it was just fun and games.***
> *Lancaster, Female, 18*[83]

> ***The national lottery. Everybody does that I think. Well, in my house, everybody I know does it: Mum, Granny, my Dad.***
> *Young Person Group, 16-19*

Attitudes to gambling also shaped exposure to advertising and gambling activity. A number of participants described themselves as ideologically opposed to gambling, or gave strongly negative views of all types of gambling. These views had been largely shaped by the attitudes and experiences of other friends and family, particularly parents (where the participant was under 16), or by news coverage of gambling addiction including stories of well-known celebrities or sports stars. Many children recounted how their parents had warned them against gambling, and a couple had personal experience of adults who had experienced loss and/or addiction. As such, these participants claimed to be aware of the potential risks and societal ills that could arise from gambling and, furthermore, perceived themselves to be relatively immune to or easily able to ignore gambling advertising, which they saw as not relevant to them. However, parents were also witnessed participating in the very forms of gambling which the children had been warned against. This, alongside being presented with opportunities to contribute to a gamble (e.g. select lottery numbers), led some to feel confused about the risks of gambling.

> ***People do it for fun and can get addicted. Gambling could put you in harm as you could lose money. I know people who have gambled and lost so much money and never won, they are losing more than they are gaining.***
> *Glasgow, Female, 13*

> ***I really don't like gambling. I see people sitting at the machines all day and don't like it. I want to make sure I stay away from gambling when I'm older. I played the slot machines once on holiday in Wales, and got annoyed because I lost my money.***
> *Birmingham, Female, 12*

Others were more open to gambling and felt that it can create an opportunity to bring people together, for example socialising at bingo events or connecting family and friends at key sporting moments. Participants also highlighted that gambling can be a source of charity funding, such as lottery or raffles.

[83] The quotes used throughout this report are drawn from the in-depth interviews with individuals conducted by Ipsos MORI, and the group discussions conducted by ScotCen. As such, the descriptions used to profile quotes vary depending on whether the individual took part in an depth interview or a group discussion.

5.4.2 The quantitative data gathered also showed the importance of family and friends in raising awareness of gambling

A quarter (25%) of participants had heard about gambling through word of mouth from their friends or family within the last month (14% aged 11-17 vs 34% aged 18-24). Also, about one-quarter of male (25%) and female (23%) carers were perceived by respondents to think gambling was acceptable, and those carers who gambled were much more likely to find the gambling of the respondent as acceptable (almost 40% stating that it was acceptable – 37% for female carers and 39% for male carers).

Table 5.3 demonstrates that respondents who reported having a male carer who gambled had on average seen significantly more types of gambling marketing in the last month (mean=7.1) and were aware of a higher number of gambling brands (mean=7.6). However, no significant association was identified between having a female carer who gambled and awareness of gambling marketing or brand awareness.

This is whilst Table 5.4 shows that the mean number of types of gambling marketing seen (mean=7.6) and mean brand awareness (mean=7.9) was significantly higher among those aged 11-24 whose male carer was perceived to view the respondents' gambling as being acceptable. For those with female carers who thought gambling was acceptable, significant results were observed for mean brand awareness (mean=8.0), but not for types of gambling marketing seen.

A significant association was observed for 11-24 year olds whose closest friend gambled in relation to the number of types of marketing seen (mean=8.5) and brand awareness (mean=8.7) (as shown in Table 5.3 below), demonstrating the importance of peers' gambling behaviour too.

Table 5.3: Mean number of types of marketing seen and brand awareness by carer and peer gambling status

		Mean marketing awareness		Mean brand awareness	
		Mean	Weighted base	Mean	Weighted base
Total		6.5	1056	7.3	1080
Female carer gambling status					
	Female carer gambler	6.6	358	7.4	364
	Female carer non-gambler	6.7	675	7.3	690
Male carer gambling status*					
	Male carer gambler	7.1	460	7.6	471
	Male carer non-gambler	6.3	502	7.0	513
Peer gambling status*					
	Closest friend gambler	8.5	321	8.7	326
	Closest friend non-gambler	5.8	689	6.8	704

Table 5.4: Mean number of types of marketing seen and brand awareness by carer gambling acceptability

	Mean marketing awareness		Mean brand awareness	
	Mean	Weighted base	Mean	Weighted base
Total	6.5	1056	7.3	1080
Female carer gambling acceptability*[84]				
Female carer gambling acceptable	7.3	242	8.0*	243
Female carer gambling not acceptable or neutral	6.4	788	7.1	809
Male carer gambling status*				
Male carer gambling acceptable	7.6	248	7.9	251
Male carer gambling not acceptable or neutral	6.3	715	7.1	733

[84] Significant difference for brand awareness only

6 Evidence of appeal and likely susceptibility

This chapter explores which themes and features of gambling advertising are appealing to children, young people and vulnerable adults, and the prominence of these within gambling advertising and marketing. It draws on the findings of what participants identified as being appealing in the qualitative fieldwork, and the prevalence of the key features identified within the content analysis.

6.1 Key findings

- Understanding of the associated risks of gambling was mixed and there were calls from participants in the qualitative research for clearer warnings communicating both the risks and the ways that people can gamble safely.
- Children, young people and vulnerable adults were attracted to a wide variety of themes and features within advertising, the appeal of which was not always exclusive to these groups.
- Participants in the qualitative research said they thought consumer protection messages could be improved; for example, the survey showed that only 53% aged 11-24 had observed age restriction messages and only 38% had seen safer gambling warnings.
- There was some evidence of content that may appeal directly to children and young people, often relating to the use of child-friendly images or representation of individuals under the age of 25.
- There was mixed evidence of the prevalence of other themes and features identified in qualitative research as having wider appeal to children, young people, vulnerable adults and others. The use of humour and celebrities within adverts was found to feature more often than the promotion of winners or the use of glamour.
- Use of financial incentives, to which children, young people and vulnerable adults may be susceptible was widespread. This included use of free or matched bets, offers only available to new customers, or suggestions that risks have been minimised through money back guarantees.
- It is plausible that some advertising content may exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children, young people or vulnerable adults. This largely related to the understanding and presentation of risk within specific bets or offers promoted.
- Evidence of prominent messages of age restrictions, terms and conditions of placing a bet, or ‘safer gambling’ was low. Researchers judged there to be very low visibility of these messages across adverts in all media.

6.2 Appeal of gambling advertising

6.2.1 Overall, most claimed to dislike gambling advertising

From the qualitative research it was clear that most participants held negative views towards gambling advertising on the whole. This group claimed that they paid little attention if gambling adverts appeared, or would change channel or activity to avoid them. They often reported being frustrated at the unsolicited nature of some advertising (for example interrupting viewing and being forced to watch adverts when watching videos or playing games online), and felt that it wasn’t relevant to them.

The survey results support these generally negative views of advertising. Only 17% of respondents aged 11-24 held mainly positive views of viewing adverts in general. When asked about gambling marketing specifically, only 5% said that they liked gambling adverts.

6.2.2 There was mixed understanding from participants of the associated risk of gambling

In spite of believing that gambling ads were largely not of interest, there was a strong sense among the children and young people that, in theory, gambling could be enjoyable, with participants using words like 'fun', 'thrills', 'rush' and 'excitement' when talking about it. However, their understanding of risk varied. Some participants were comfortable with the trade off between enjoyment and risk in a controlled manner, clear that the chances of winning are low but that it is worth spending small amounts, within limits, for the sense of enjoyment. Yet many participants, especially those under 16, admitted that they did not fully understand how odds worked, with this age group offering simplistic descriptions of risk. There was also some confusion about the chance of winning under lotteries or prize draw activities, where some participants emphasised the fact that someone must or is very likely to win, to highlight their own individual chances of winning.

> ***I'm not sure but I think it's aimed at an older crowd, the guy is in his 40s and younger people most likely wouldn't understand the odds. They are aiming it at people who would know more about it.***
> *London, Male, 17*

> ***There's some truth to it because you might win, you might not… but it's like you're not guaranteed. So it's not technically false advertising, but not technically true advertising either.***
> *Young Person, 13-18*

Without prompting, there was broad consensus that more could be done to highlight the risks of gambling within advertising and marketing. Overall, participants were aware that the chance of a major gambling-related win was unlikely, but felt that this was not depicted in the marketing. Participants felt that advertising largely over-emphasised the fun aspect of gambling at the expense of risk, and sometimes portrayed gambling in ways that were either untrue or not realistic. This included both the content of the gambling activity, and the wider context in which the ad is set (for example friends socialising, or appearing glamorous).

> ***It comes across as very harmless, it's just a game. They try to detract from the fact that it's gambling and you could lose money.***
> *Young Person, 20-21*

> ***I don't really like lottery ads – like the Postcode Lottery – where they go to someone's house and hand them a really big cheque. I think that can be quite misleading… it's just vague and I think misleads people to think that's gonna be what happens to them.***
> *Young Person, 14-19*

6.2.3 Children, young people and vulnerable adults were attracted to a wide variety of themes and features in gambling advertising

The qualitative research identified a wide range of themes and features of advertising that either attracted the attention of participants during the diary exercise and/or were raised by participants during wider discussion as aspects they found appealing. These features are wider than the use of visual images and colours, or references to specific child friendly terms, and include references to the wider framing of the gamble, such as emphasis on fun or financial offers.

Many of these themes and features were identified (by participants and/or researchers) to have broader appeal beyond children, young people and vulnerable adults. As such it was difficult in a qualitative setting to identify a specific set of features that were of particular or unique appeal across individual participant groups that may help guide advertising regulation.

In alphabetical order, the themes and features that did appeal to participants included:

- Celebrity endorsement: this was thought to appeal to and attract the celebrity's fans and more widely perceived to make the promotion more authentic, trusting and memorable. The choice of celebrity dictated the appeal of the advert; examples of appeal to children and young people included use of sports stars. This included use of current sports stars in imagery, or the endorsement of former stars and current pundits on popular sport shows – for example Harry Redknapp, Chris Kamara and Jeff Stelling.

- Characters: participants also remembered the characters that were used in marketing campaigns and adverts. This spontaneously included adverts from Foxy Bingo, Gala Bingo, Ladbrokes, the National Lottery and Paddy Power. Even if they couldn't remember the specific content of the ad, participants cited examples in which they could remember the main characters. The traits of characters determined whether they were perceived to be particularly appealing to children – for example animated characters, or the use of animals.

- Colour: participants in all categories (children, young people and vulnerable adults) were more attracted to gambling advertising that used bright and engaging colours. This was evident on TV and social media, where participants noted a substantial competition for attention, but also offline in window displays, billboards at the point of purchase within shops, which were all reported as using eye-catching colours, designs and presentations. Participants felt that use of colour could be particularly appealing to younger children.

- Fun: there was evidence that children and young people were attracted to advertising which reinforced the fun element of participating in gambling with low risk, or presented taking part as harmless or light hearted. This was particularly relevant for games involving gambling, which participants felt may appeal more to children and young people.

- Glamour: younger participants were more likely to identify with content with perceived high production value that often appeared dramatic, akin to a film. Some participants noticed ads that associated gambling with a glamorous lifestyle, such as dreaming of a big win and using winnings to treat yourself, friends or family.

- Humour: marketing that used humour appealed to all participant groups, and was perceived to potentially have universal appeal to others. Even when there was no specific call to action to place a bet, participants reported that humorous ads aided recall, made gambling seem less serious and therefore more acceptable.

- Memorable songs and catchphrases: these were seen by all participant groups as aiding recall of the ad and brand. Regardless of whether participants liked the song, they reported that the tune or phrases can often remain 'stuck in their head'. A good example cited by participants was advertising for Foxy Bingo. Participants broadly felt that catchy songs were particularly attractive to young people, some of whom said they would hum or sing along inadvertently.

- Offers: adverts promoting special offers were also striking. This included promotion of free bets or spins, deals and boosts in odds, or reduced risks through money back guarantees. There was evidence of this being particularly appealing to low frequency gamblers or those who hadn't gambled before (including children and young people), and vulnerable adults with financial difficulties. In addition to financial incentives, participants noticed ads that used other promotions such as casinos offering free drinks.

- People like me: in addition to presenting winners from members of the public, participants were also attracted to adverts that used other features to appear personalised or that gave the reader a sense of ownership. Moreover, social media content that had been shared or liked by friends was assumed to be more relevant and therefore more appealing.

- Skill: ads that used features such as odds boosts or referenced accumulators were seen as particularly attractive to high risk or frequent gamblers. This was apparent in the ads shared by these groups, which appealed to a sense of expertise and knowledge, or sense of community of skill.

- Winners: showcasing previous winners was seen as a particularly appealing feature of lottery and bingo ads, adding authenticity (as these were represented as ordinary members of the public), and as encouraging others to try and replicate success. This was especially alluring when playing for large prize money, such as rollovers. Vulnerable adults in financial difficulty were particularly susceptible to these features.

Appeal cannot therefore realistically be defined in a simple binary term 'does appeal to young people' or 'does not appeal to young people', or in terms that classify appeal as being significantly different at the point at which children turn 16. Gambling advertising in sport is a clear example of a category that can appeal to a wide audience (for example in the use of sports stars), including children, even if this is not the overall intention.

6.2.4 11-24 year olds thought excitement, money and sociability were the most likely positive outcomes associated with gambling

In the survey those aged 11-24 completed a modified version of the Gambling Outcome Expectancies Scale (GOES) to assess their views and attitudes towards gambling.[85] The responses to the statements in the GOES instrument are classified into five sub-scales: excitement, escape, ego enhancement, money (financial gain) and sociability.

Overall, 11-24 year olds did not associate gambling with positive expectancies – across all five sub-scales, the average response was below a score of 3 (out of 5), which shows that respondents were more likely to disagree than agree with each statement. However, within the GOE Scale, there was a higher level of favourability to statements in the excitement, financial gain and sociability subscales. For example, respondents were most likely to agree with the statements: gambling is a rush (46%), gambling provides a good chance to win big with small money (40%) and gambling is a way to make big money (39%). Financial gain was found to be a common feature of gambling advertising in the content analysis. There was also evidence of gambling adverts that played on excitement and sociability. It is interesting to note that these views did not differ by age or gender, but those who were current gamblers had significantly higher scores in the excitement and financial gain subscales compared with non-current gamblers (as shown in Table 6.1 below).

Table 6.1: Mean Gambling Outcome Expectancies Scale (GOES) by age

Age	Mean Gambling Outcome Expectancies Scale /5				
	Excitement	Escape	Ego enhancement	Money	Sociability
11-17	2.7	1.8	2.1	2.7	2.6
18-24	2.8	1.7	2.1	2.8	2.5

For vulnerable adults on low incomes, and those routinely struggling financially, gambling was sometimes framed as a potential means to make extra money. Some participants living on low incomes described living within social environments where it was normal to borrow money from friends to fund gambling as a way to better their financial situation. These participants tended to share apocryphal stories of their own previous gambling successes, or those of their friends, to support the concept of gambling as a way to make money.

6.2.5 There was also evidence suggesting that consumer protection messages could be improved

Across the qualitative research, there was a wider call from participants for more messages which emphasised the risks of gambling, or explained how people can gambling safely. Gambling marketing was contrasted unfavourably with alcohol and tobacco marketing, both of which were described as being much less intrusive and visible, despite the fact that gambling could be as destructive as alcohol and tobacco to individuals, families and communities.[86]

Information about the risks of gambling, where to seek help, age restrictions and other terms and conditions that were part of current gambling marketing were thought to be inadequate at present. The size of the warnings, the placement of

[85] More information on the GOES can be found in the methodology summary (section 9.7)
[86] Participants were largely unaware of the different legislative regimes surrounding the advertising of these goods.

the text and even the messages were described as being dwarfed by the actual gambling marketing. The message "when the fun stops, stop" was also queried, in that part of the enjoyment for some individuals is the challenge of trying to win back money after a series of losses. Therefore, as well as possible gambling-related public information adverts, it was stressed that any warnings in current gambling marketing had to be made much more striking, and information provided had to be as visible as the actual gambling promotion itself.

> ***Some of like the warnings of it are so small at the bottom of it … Maybe if they could make them bigger, people would start understanding.***
> *Young person, aged 13-18*

> ***I think like with the 'When the fun stops, stop' and the GambleAware logos, put them bigger and in the middle, not at the bottom in teeny writing where nobody's going to pay attention to it right at the end of the advert.***
> *Young person, aged 20-21*

> ***Maybe provide a bit more understanding on the website, 'cause not many gambling websites…They've got all their games on it, but they don't have quite a lot o' information, so see if their sites maybe provided an information page for people to go to – to then understand a bit more about gambling – it would make gambling a bit safer for them.***
> *Young person, aged 13-18*

In the survey 11-24 year olds were also asked about whether they had seen any information in gambling marketing that suggests you need to be a certain age to gamble. Just over half of those aged 11-24 (53%) had observed such age warnings. Among those who had a greater awareness of gambling marketing and among those who had participated in two or more marketing activities, awareness of age warnings was higher (70% and 72% respectively). Having seen age warnings was significantly higher among males (58%) and current gamblers (64%). Only 8% of those who engaged with gambling marketing two or more times during the previous month were not aware of the warnings; though 19% were not sure.

Participants were also asked if they had seen any information, health messages or warnings in gambling marketing in the past month. It should be noted that awareness of the health warnings was consistently lower than awareness of age-related warnings among the respondents (53% had seen age warnings compared to 38% who had seen health warning). Those who participated in two or more types of gambling marketing reported the highest level of awareness of the warnings (66%). In addition, significantly more men (48%), current gamblers (50%) and those with high marketing awareness (55%) had seen health warnings.

6.3 Prominence of themes and features

Approach to content analysis

Content analysis is a systematic process of analysing communication messages to identify and classify related themes of significance. This chapter has been informed by two independent, but complementary pieces of content analysis:

1) Full Media Deep Dive, led by the University of Stirling.

- Sample of 300 adverts across eight forms of paid-for advertising, captured by Ebiquity's media monitoring programme.
- Samples randomly selected from 5-11 March 2018 and 12-18 March 2018; these weeks were chosen to reflect a week of high intensity and an adjacent week of average intensity according to Ebiquity's estimated spend data.
- Sample was stratified by media channel to reflect the advertising activity of those weeks. This included 224 x print press, 27 x internet, 22 x TV, 11 x radio, 16 x other (email, direct mail, door drops, outdoor). In total, 45 brands were represented across the sample.

2) Twitter Deep Dive, led by University of Bristol.

- This used a random sample of 800 Twitter posts collected through the work of Centre for Analysis of Social Media (CASM) at Demos.[87] Though some are based outside of GB and may not be targeting a GB audience, there is still engagement from British users. Further research is therefore required to consider how and why users engage with this content.
- This included 241 Traditional Betting Tweets from bookmakers, affiliates and tipsters that clearly advertised a particular bet or offer, 181 eSports Betting Tweets from eSports accounts that clearly promoted a particular bet or offer, 191 Traditional 'Content Marketing' Tweets from bookmakers and tipsters, and 190 eSports 'Content Marketing' Tweets from eSports accounts.
- Content marketing had been identified within the Demos analysis as content produced by betting accounts which did not directly encourage a specific gambling activity. This style of advertising is identified in the literature as a longer-term strategy designed to build brand loyalty.

Both studies developed bespoke codeframes informed by the research objectives and existing self-regulatory codes in GB, and asked researchers to manually code creatives in accordance with the codebook. This included a codebook informed by previously published research, piloting, inter-coder reliability tests, and regular feedback meetings between coders.[88]

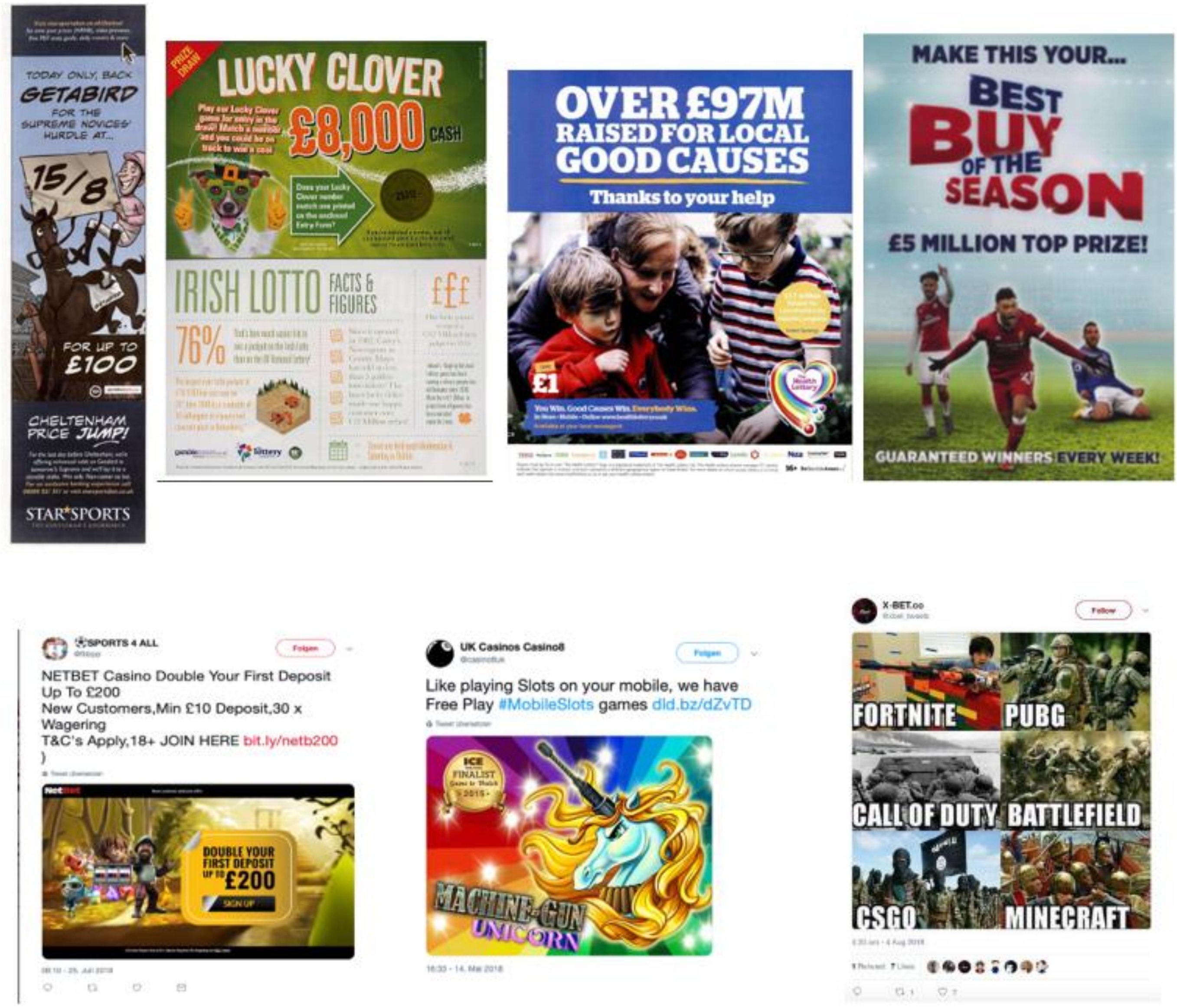
6.3.1 Limited evidence of direct appeal to children, young people and vulnerable adults, often related to the use of child friendly images

There was some evidence of content or features that could appeal directly to children and young people over other groups. University of Stirling identified three features that could appeal directly to children and young people: i) language that might appeal (e.g. 'Starburst', 'House Party'); ii) graphic design that might appeal (e.g. cartoon-like, colourful); and iii) narratives such as fun, excitement, or 'non-stop' playing. At least one of these features was identified in 11% of all 300 of the creatives analysed as part of the study.

Using a similar definition of features that could appeal directly to children, researchers at University of Bristol found a higher prevalence of the features in the Twitter content analysis, where 21% of Traditional Betting Tweets, 59% of eSports Betting Tweets, and 37% of eSports Content Marketing Tweets were judged to contain features that could plausibly appeal directly to children and young people. This was largely accounted for by the use of images and animations. Examples of this included cartoon or animated style graphics, and features such as popcorn, lucky charms and unicorns, and game-like avatars.

[87] It should be noted that the accounts presented within the sample have not been verified as licensed gambling operators in Great Britain, some are from unlicensed operators, some are also from affiliates.
[88] Where appropriate, the research draws on guidance and advice published in the CAP code and by ASA to inform discussion of key issues relevant to this project. In some cases, the findings highlight cases which plausibly contain content which may not comply with these self-regulations; however, it should be noted that researchers do not seek to provide an assessment of whether any complaint would or would not be upheld. They acknowledge that such a judgement would also be subject to individual interpretation.

Figure 6.1: Examples of adverts judged as plausibly having appeal directly to children and young people



6.3.2 Mixed presence of other features which attract the attention of children, young people and vulnerable adults but may also have wider appeal

As noted in Chapter 5, the qualitative research highlighted that children, young people and vulnerable adults are attracted to a wide variety of features within gambling advertising, but the appeal of these advertising characteristics is not likely to be unique to these groups. Researchers found mixed presence of these features within the content analysis. This includes:

- The use of humour – researchers found that 75% of the Traditional Content Marketing Tweets, and 36% of the eSports Content Marketing Tweets used humour.
- Personalising ad content – this approach was identified in 43% of creatives within the Full Media Deep Dive. In these instances, adverts used the second person and possessive pronouns, implying the ad was aimed specifically at the individual audience member or that the gamble (or associated winnings) belonged to them.

- Presence or endorsement of celebrities – a third (33%) of creatives within the Full Media Deep Dive featured celebrities.

- Presentation of winners, including testimonials – this was a less prominent feature, identified in only 7% of the Full Media Deep Dive and was most apparent in lottery adverts.

- Suggesting gambling was glamorous and desirable – few ads were judged as glamorous (4% within the Full Media Deep Dive). Those that did, suggested betting could lead to a glamorous and desirable lifestyle.

- Use of memorable songs – although researchers were not able to judge the extent to which the music was memorable, 88% of adverts shown on TV and radio within the Full Media Deep Dive did contain music.

6.3.3 Use of enticing financial offers was a common feature of gambling advertising; these features were also likely to attract the attention of children, young people and vulnerable adults

The literature review noted that young people appear particularly susceptible to financial incentives. For example, that "some children incorrectly thought that financial incentives meant that gamblers could never lose". This was further evidenced within the primary qualitative research for this study, where awareness of risk was mixed and participants were drawn to adverts that emphasised fun and enjoyment. The appeal of financial incentives was also apparent among vulnerable adults, particularly those who were identified as financially vulnerable, and those identified as high risk or problem gamblers.

The most prevalent of these financial incentives was reference to a 'free' or 'matched' bet. Almost half (44%) of the creatives analysed in the Full Media Deep Dive referred to a free or matched bet, and in the Twitter Deep Dive 47% of all Tweets looked at contained reference to free or matched bet. Price offers and bonuses also appeared regularly (in 41% of creatives), as did adverts that referred to a means of minimising risk (27%), and ads that referred to an offer only available to new customers (24%).

Although there are provisions set in place by ASA (specifically the CAP codes) to discourage trivialisation of gambling or placing undue emphasis on money motives for gambling, researchers found widespread use of financial offers that they believed could be construed to be in breach of these codes. Examples of the sorts of offers they identified are price offers and bonuses, which featured in 41% of the creatives analysed by the University of Sterling. The University of Bristol's research found that 34% of Traditional betting Tweets placed a strong emphasis on monetary benefits; examples include a Tweet which urges readers to '*make yourself an extra £££+ a month*'.

Figure 6.2: Example of adverts containing features that may appeal to children and young people as well as wider audiences

6.3.4 Some ads may exploit the susceptibility of children, young people and vulnerable adults

Section 16.3.2 of the CAP code states that 'marketing communications must not exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children, young persons or other vulnerable adults.' However, the qualitative research identified mixed understanding of risk and financial offers.

Within the Full Media Deep Dive, researchers at University of Stirling identified four themes that may plausibly exploit the susceptibilities, aspirations, credulities, inexperience or lack of knowledge of children, young people or vulnerable adults.

- Implying limited risk - for example describing bets as 'risk free', suggesting that gambling was possible without betting money, or promoting the ability to reclaim losses.
- Overly complicated or potentially misleading presentation of gambles and offers – for example using acronyms or technical terms.
- Inflated suggestions of winning – for example implying that someone had already won.
- Suggesting gambling was simple or that the company provided a safeguard – for example 'Couldn't be easier with the friendly William Hill team members on hand to help'.

In total, 22% of ads within the traditional media content analysis were found to contain at least one of these features. This rose to 37% of adverts within the Twitter dataset using a similar definition. This was mainly due to financial incentives that were complex to understand or were unrealistic.[89]

[89] Herein lies a possible tension with the need to comply with consumer law. As stated by the Competition and Markets Authority, it is important that significant conditions associated with the gamble must be transparent and clearly displayed on advertising, yet, the short form of Tweets presents a particular challenge here, as explanations are necessarily curtailed and therefore are particularly prone to a lack of clarity.

There is also concern that Tweets from gambling brands are seldom labelled as advertising. The University of Bristol found that none of the 800 Tweets analysed manually within the Twitter Deep Dive contained clear labelling – none of these Tweets were sponsored ads that would have appeared as promoted, paid for content at the top of users' newsfeeds. This is not to suggest that users would not be able to identify some of this content, for example where it clearly comes from a recognised gambling brand and advertises a clear gambling proposition. However, given the wide variety of authors, and the type of marketing that is used on social media (discussion of hot topics rather than specific inducement to gamble), it is not clear that children, young people or vulnerable adults could identify that the Tweets are designed to elicit a behaviour that profits a third party.

Similarly concerning is the evidence of gambling companies creating a sense of urgency.[90] The most prominent feature evident within the content analysis was the use of time limited gambles or offers, 77% of creatives within the Full Media Deep Dive contained this feature. Though only a very small number of ads were judged to encourage excessive gambling (one per cent), it was more common to reference normal, frequent or daily gambling behaviour (33% within the Full Media Deep Dive).

6.3.5 Poor visibility of consumer protection messages

There was very little evidence of prominent consumer protection messages that might help raise awareness of the risks of gambling amongst children, young people and vulnerable adults, or indeed generally to any audience. The presentation of age warnings, promotion of lower-risk gambling, or of terms and conditions was judged to be poor in both traditional media and Twitter datasets.

In the analysis of 300 creatives across eight forms of paid-for advertising led by the University of Stirling, in 14% of ads there were no age warnings present, 11% with no terms and conditions, and 14% where there was no reference to messages that promote lower risk gambling and support (e.g. begambleaware.org). Furthermore, none of the ads were found to have age warning messages that had either acceptable, good or very good visibility, and only 1% had messages that promote lower-risk gambling or signpost support that were similarly visible.[91]

Twitter analysis told a similar story of poor referencing to consumer protection messages. Only 7.3% of Tweets from betting accounts referenced either Terms and Conditions or messages that promoted lower-risk gambling within the text. It is worth noting that this was particularly poor for eSports, where this was recorded at just 0.1%. Outside of the text 69% of traditional accounts did have some kind of reference within the image, but this was only 2% for eSports. There was some inclusion of age restriction messaging within descriptions and 86 accounts were responsible for 51% of this messaging (but this will not be seen within someone's Twitter feed, as only the first part of a post will be seen initially).

[90] CAP published further guidance on the 'tone' of advertisements which came into affect in April 2018 this included restricting ads that create an inappropriate sense of urgency like those including "Bet Now!" offers during live events. https://www.asa.org.uk/uploads/assets/uploaded/bb5292af-96f3-4c28-94a031dbfdfde3d8.pdf

[91] Acceptable visibility – 16-20% of space; Good visibility – 21-25% of space; Very good visibility - >26% of space

7 Evidence of impact

This chapter considers the impact of gambling advertising on children, young people and vulnerable adults. The findings draw on survey data collected by ScotCen as well as analysis from the focus group and diary research conducted by ScotCen and Ipsos MORI. Where relevant, this is supplemented by data from the Gambling Commission and other strands of this study, to consider the prevalence of certain features within advertising that relate to different types of impact.

Key findings

- The primary qualitative research found some evidence of individual ads prompting an immediate response, and resulting in gambling behaviour that had not already been intended or considered by participants. This was most apparent among those who were frequent or problem gamblers; however, adverts which encouraged new customers to sign up through special offers did also have appeal to other participant groups.
- Feedback from participants and observations by researchers also identified a wide range of emotional and cognitive responses to gambling advertising and marketing. The claimed and observed impact of this was to change participants' framing of and associations with gambling, rather than eliciting an immediate desire to gamble, for example, normalising gambling behaviour, creating trust in gambling brands or a fostering a sense of community.
- Advanced statistical analysis showed that among those who did not currently gamble, exposure to advertising was significantly associated with likelihood to gamble in the future, after controlling for demographic and other factors. Those who had a greater level of exposure, those who engaged with the marketing activities of gambling operators, and those who had a high level of brand awareness were more susceptible to gambling in the future. These associations do not demonstrate causation, but do show evidence of a relationship between marketing and likelihood to gamble.
- Factors which were significantly associated with current gambling included peer gambling, engagement with marketing, brand awareness, parental gambling and age. Of these factors, peer gambling had the greatest association with current gambling; those who have a close friend who gambles are six times more likely to be a current gambler than those with no close friends who gamble.
- Age was significantly associated with both susceptibility to gamble in the future, and current gambling behaviour. However, having controlled for this within the statistical analysis, it is clear that any further significant associations (including differences by exposure and interaction with gambling advertising) are not driven by any underlying differences in age between those aged 11-17 and those aged 18-24.

7.1 Overview of impact

7.1.1 The impact of gambling advertising goes beyond traditional selling techniques that elicit an immediate response

A wide variety of impacts from gambling advertising and marketing were evident across the research. In support of the modern taxonomies used to describe the way advertising works (see Feldwick 2015, and Vakratsas and Ambler 1999 below), it is clear that gambling advertising can be successful in having both a direct impact on immediate behaviour, and more broadly in generating emotional and cognitive responses that can help shape attitudes to and associations with gambling. We found evidence of a range of both direct and indirect impacts from gambling advertising across a number of domains:

- Salesmanship: direct selling of gambling products aimed to elicit an immediate purchase, such as advertising odds, jackpots and new customer offers,[92]
- Spin: shifting the whole frame of reference within which people consider gambling,
- Salience: brand salience can be achieved through saturation of advertising, this includes using fluent devices, a repeated idea aiding speed of cognitive processing helping to drive system 1 decision making,
- Social connection: supporting a connection between the viewer and the brand by building a 'community' or relationship, and dismantling the social norm around gambling that it is an isolated activity,
- Seduction: takes advantage of the identification of System 1 decision making, brands create advertising with an emotional hook which allows the brain to process information quickly; and
- Showmanship: advertising can serve to entertain and to create a spectacle, drawing people to the brand by generating interest and attention.

How advertising works

The way advertising works has been hotly debated in academic and practitioner circles for well over 100 years. To date, there is no one all-encompassing model of how advertising makes an impact on the people towards whom it is targeted. In many ways, this should come as no surprise, as advertising has many purposes depending on the objectives of the advertiser.

In 1999, Vakratsas and Ambler[93] set out a taxonomy of how advertising works noting that sometimes (although not very often) the objective of an advert is to elicit direct or sometimes immediate purchase or action. They concluded that much more often the impact is indirect with the advertising having an effect on beliefs or emotions which may, or may not, in time lead to an action by a consumer. Often the purpose of an advert is to create an emotional connection with the brand which will, over a much longer period of time, build a positive association which builds loyalty and sustained profitability. Other forms of advertising interacts with the experience a consumer already has with the brand or product, serving as a reminder or a reinforcer for current gambling behaviour.

Gambling advertising is no exception in having a number of differing objectives. For example, in-game TV advertising to "place bets now" are designed to elicit immediate action, whilst the brand building of companies (such as Paddy Power) uses experiential marketing, sponsorship and mass TV advertising with emotional or humorous appeals aiming to gain market share and long term affection and trust of gamblers.

In our analysis of the qualitative data we collected, we are mindful of the different purposes of gambling advertising across brands and channels and thus of differing theories of how and why it has impact. In this section we refer to a framework set out by Paul Feldwick[94] in 2015, that sets out a new taxonomy of the ways advertising works, or the different types of impact that advertising is designed to have. Feldwick advances substantially the work by Vakratsas and Ambler by including new understanding of the importance of emotions in advertising and how it works even when we have no conscious awareness and little recollection of it.[95]

[92] This is often associated with the well established advertising mnemonic AIDA. This states that advertising should take customers through a purchase journey to establish Awareness, Interest, Desire and Action.
[93] Vakratsas and Ambler, 1999: researchgate.net/publication/235361000_How_Advertising_Works_What_Do_We_Really_Know
[94] The Anatomy of Humbug: How to Think Differently About Advertising: https://books.google.co.uk/books/about/The_Anatomy_of_Humbug.html?id=x_dCBgAAQBAJ&redir_esc=y
[95] Seducing the Subconscious: The Psychology of Emotional Influence in Advertising: https://www.wiley.com/en-gb/Seducing+the+Subconscious%3A+The+Psychology+of+Emotional+Influence+in+Advertising-p-9780470974889

Common routes to the self-reported and observed impact of advertising on immediate behaviour included sign up offers, financial inducements, reminders of events and reminders to gamble at the point of sale. The impact (as claimed by participants and/or observed by researchers) of wider emotional and attitudinal responses to viewing gambling adverts included: increased awareness of gambling as a result of advertising; a feeling of normalisation around gambling; broadening of what constitutes gambling; feeling part of a community; providing an escape, creating trust, and creating misperceptions of risk involved in gambling.

In some instances, these emotional and cognitive responses had an immediate impact on participants framing of and associations with gambling; however, participants also stressed that the impact on attitudes to gambling is likely to be more cumulative over time, as a result of repeated exposure to advertising.

In many cases, gambling adverts achieved more than one outcome. For example, encouraging people to place an immediate gamble whilst at the same time shaping the framing in which they consider gambling. The subsequent sections of this chapter consider each of these domains in turn. These sections comment on the impact of gambling adverts, primarily as reported by participants or observed by researchers in the qualitative research, and the features of adverts that led to these.

7.2 Impact on immediate behaviour

7.2.1 Adverts did increase the likelihood of current gamblers placing an additional bet

There was evidence from the qualitative research that gambling adverts can elicit an immediate response to either gamble or create a new gambling account. This closely aligns with the aims of salesmanship models of advertising. Those who were problem gamblers or frequent gamblers were more likely to have reported that they had responded to direct calls to action in gambling marketing. Problem gamblers reported themselves as being particularly susceptible to this form of gambling marketing. Although they were likely to gamble in the near future, advertisements did serve as a reminder or introduction to specific offers they could get involved in, and specific bets they may not have made if they had not seen an advertisement for them. This is while, those who had proactively stopped gambling were viewed by participants as being at risk of starting to gamble again when faced with the profusion of marketing.

> ***I obviously don't like the amount of adverts and stuff they bombard you with. I think it's wrong, immoral, and I do believe that the sign-up offers that they push is designed to obviously get the youngsters hooked: kind of you deposit money and then you get matched deposit – 'free money' effectively… I'd probably be frustrated seeing these adverts in recent years, just because I know of the damage that that could possibly do to somebody…these adverts are probably what got me started as well, you know?***
> *(Problem gambler interview 5)*

There was little direct evidence within the qualitative research of immediate action reported among children, young people and other vulnerable adults in response to seeing a gambling advert. This finding is supported by data gathered as part of the Gambling Commission's young people and gambling participation 2019 survey. The survey found that among young people who have ever seen a gambling advert or sponsorship, the majority (83%) said that this did not prompt them to spend money on gambling when they had not intended to do so. Seven per cent said that the advert or sponsorship did prompt them to do so, whilst 10% were unsure. This is consistent with the equivalent 2018 survey, when seven per cent said that an advert or sponsorship had prompted them to spend money on gambling when they weren't otherwise planning to.

7.2.2 Ads had most impact where they reminded viewers of an event, were focused on odds or skills, or were placed at the point of sale

The immediate impact of certain gambling advertising and marketing for current gamblers was apparent in three ways, illustrating the range of ways viewers can be influenced to act immediately:

1. Adverts served as a reminder of an event coming up: for frequent gamblers, adverts and promotions served as reminders that a big game or major sporting event was coming up, or included specific offers that would entice them to gamble.

 I think it's a negative effect hugely I mean because it's just enticing you back at any available opportunity. It might be whatever day it is, and you might not realise there's a match on that night, but then they might be saying, 'Oh, so-and-so is playing so-and-so tonight. Have a bet'. You know what I mean? It's every day, innit, there's a market to bet on, so – yeah – it has a huge effect on a lot o' people.
 Problem gambler interview 2

2. Messages focussed around skill or odds: this had a special meaning for seasoned gamblers, who tended to note that certain odds or offers would be more attractive to them as experienced gamblers, with good understanding of odds, and less attractive to newer gamblers, who did not have this knowledge. These types of adverts created the idea of a community based on skill. The types of marketing that were said by participants to have resulted in immediate gambling included online offers, television advertising, bookmakers offering special deals (including enhanced odds, complex bets and 'free' bets), and gambling companies sending promotions by text, if mobile numbers were required to register online, or with bookmakers. These features were evident within the content analysis, where 41% of adverts in the Full Media Deep Dive used price offers and bonuses (this included references to enhanced odds, for example).

3. Point of sale advertising in shops: this was another way to achieve an immediate outcome for problem gamblers for instance at the till. This was evident in shops that were not betting shops, and where the initial intention of visiting the shop wasn't to place a gamble, as shown in the examples below. Advertisement at the point of sale provides an immediate reminder and opportunity to gamble. This did lead to direct action in a small number of cases within the qualitative research.

Figure 7.1: Examples of adverts that appealed to problem and frequent gamblers

Where were you? *"In the shop"*
What were you doing? *"Placing bets"*
Where did you see the ad? *"In a shop"*
What do you like about the advert? *"Showing the odds"*
What do you dislike about the advert? *"Want better / more odds … lol"*
After seeing it, what do you want to do now? *"Place bets"*
London, male, age 46, High risk gambler

Where were you? *"In the house"*
What were you doing? *"Just watching tv"*
Where did you see the ad? *"Social media"*
What do you like about the advert? *"it had a intriguing price offering. also liked the fact its a stark reminder that the football season is in full flow"*
What do you dislike about the advert? *"i dont have lots of money, but it will probably make me bet"*
After seeing it, what do you want to do now? *"bet"*
Glasgow, male, age 33, Frequent gambler, economic circumstances recently changed

Where were you? *"Shop"*
What were you doing? *"Buying sugar"*
Where did you see the ad? *"In a shop"*
What do you like about the advert? *"I could win some money"*
What do you dislike about the advert? *"Nothing"*
After seeing it, what do you want to do now? *"I have paid my ticket"*
London, male, age 24, Moderate risk gambler

Furthermore, there was a broad consensus that the introduction of online gambling had increased the accessibility of gambling, in terms of both ease and availability, especially given participation is no longer restricted to the opening hours of casinos, bingo halls and betting shops. In this sense, participants in the qualitative research largely tended to be more concerned about the presence of online gambling itself, rather than the online advertising of gambling. However, there was some concern that it was easier to take advantage of promotional offers advertised online, which participants felt would likely prompt gambling activity that would not have otherwise taken place offline.[96]

> ***It's so very, very easy. It's a lot easier now than it used to be fifteen years ago. Mobile betting apps weren't available. Bookies would shut at night. My mates bet through the night now.***
> *Male, Glasgow, Frequent Gambler, Struggles with Money*

7.2.3 Gambling adverts also encouraged potential new customers to sign up

It was also noted by participants that there were some adverts that aimed to encourage new members to sign up immediately. Free bets, large jackpots or reduced risk offers were messages that specifically appealed to new audiences. Participants noted that these messages were attractive to them even if they didn't end up acting on them in the moment. There were some examples however, where participants did act immediately in response to these adverts (as shown in third example on Figure 7.2 below). A quarter of creatives (24%) within the Full Media Deep Dive referred to an offer only available to new customers, acting as an incentive to register. These most likely contained one of three features: offering new customers exclusive or enhanced odds; providing free or matched bets only to new customers; or reducing the perceived 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'.

Participants argued that a number of these promotions were aimed at recruiting a new, younger generation of 'smartphone' gamblers or 'new customers' and that growth in online, social media marketing reflected this. From a small content analysis of some of the most frequent online adverts viewed in the avatar research, nine of fourteen most frequently served adverts targeted new customers. With the notable exception of problem gamblers, the other participants tended to state that they had not gambled personally as a result of being exposed to gambling marketing. However, there was some evidence of immediate action among non-gamblers or infrequent gamblers.

[96] The prevalence of online ads leading to a gamble is explored within the Gambling Commission's national report on gambling participation in 2018: behaviour, awareness and attitudes. The report notes that across all online gamblers, 45% have been prompted to spend money on gambling as a result of seeing various forms of advertising (an 8% decrease from 2017). Since 2017, the proportion of online gamblers prompted to spend money on gambling by advertising has declined across all demographic groups. The largest declines can be seen among 18-24 year olds (62%, down 13%) and 35-44 year olds (45%, down 13%). It can also be observed that those in the younger age groups were more likely overall to be prompted to spend money on gambling by advertising. More information can be found here: https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-participation-in-2018-behaviour-awareness-and-attitudes.pdf

Figure 7.2: Examples of adverts designed to draw in new customers

"I like that it's a short ad, and I guess it's kind of smart because they are trying to draw in new customers by giving them deals. This advert could encourage people who watch football to bet and could make someone feel more positive about gambling as the man in the ad is happy. If they already bet without betting money, this could lure them in to make money from the betting with friends. If someone my age needed the extra money, I think they would go to their parents first but someone who is older would be more likely to gamble if they needed money"
Birmingham, female, age 16

"I like the fact that you can place a bet for free after you place a bet with your own money. It is interesting and will make people walk into a licensed bookmakers. It makes me want to place a bet as it seems like free money!
Glasgow, male, age 16

"I saw this on Twitter and want to open an online account now"
London, male, age 24

7.2.4 From the qualitative research there was limited evidence of participants interacting with adverts online

Another way that gambling advertising had an immediate impact on people was by getting them to interact and engage with this content, this would most likely be online. There was limited anecdotal evidence in the qualitative research of participants commenting on this. Some participants did report that they followed gambling companies on social media, but adverts sent in via the mobile app from social media tended to be sponsored advertisements.

As discussed in section 5.3, although there was low level of reported engagement among those aged 11-24 captured in the ScotCen survey, there was evidence of active engagement with social media content. Analysis of Twitter content by Demos noted that only 60% of content posted by accounts related to gambling contained reference to a specific gamble or offer. The remaining content was designed to engender brand loyalty, engagement and sharing through discussion of hot topics, often related to sport. This engagement came first through following a gambling account, and then either by retweeting or liking a post from these accounts. For example, among the top 10 most engaging Tweets identified by Demos, Paddy Power created a spoof text exchange between an Arsenal supporter and Stoke fan which secured 18,000 re-Tweets.

7.3 Wider impact on emotions and attitudes

7.3.1 Gambling adverts were seen by participants to normalise gambling

All participant groups raised that, in their view, gambling adverts served to normalise gambling. For many, the sheer amount of gambling advertising, across a range of contexts, media and platforms, created a sense of familiarity and that everyone else is gambling. This changed people's perceptions of gambling and led people to see gambling increasingly as acceptable. Participants argued that gambling adverts are consumed subconsciously, with the result that awareness of gambling was higher than might be assumed. This was demonstrated in the brand awareness exercise, where children and young people were aware of gambling marketing whether they have gambled or not.

This normalisation was particularly the case for football fans, where messages about gambling were seen as synonymous to almost every element of football-related media content, including online, on traditional media and during games watched in the stadium. This gave a sense that gambling advertising messages are inescapable for football fans. This is supported by evidence from the sport sponsorship analysis which from the five football matches analysed, found that there was on average a reference to gambling every 21 seconds.

> ***I feel like in the last hour I've realised that actually a lot more of it sort of seeps through in your subconscious than you're aware of. I don't feel like it has a significant impact, but it's obviously something that I'm very aware of being there.***
> *Young person, aged 20-21*

Case study: Meet Mike – age 35, Male, London, gambles for money, high risk gambler

- Sport fan, engages in a range of gambling activities , from sports to spending £thousands at a casino
- Feels he gets a competitive advantage from knowledge – sees gambling as a calculated risk
- Likes ads that speak to 'seasoned gamblers'
- Hides his gambling from family, his girlfriend doesn't like gambling.
- Feels that adverts which involve a tie-in with a mainstream brand would work to convince his partner that gambling is OK

7.3.2 Participants often had high recall of gambling adverts, raising their awareness of gambling as an activity they could participate in

Participants identified a number of different features that made adverts and brands more memorable, even if they claimed not to be interested in gambling. Exposure to this form of advertising therefore served to increase their awareness of gambling as a potential activity they could participate in. Specifically, participants noted:

- Campaign features, slogans and catchphrases, such as 'Please don't let it be them', 'It could be you', and the cross fingers device from the National Lottery.
- Memorable songs (Foxy Bingo, Gala Bingo and the Postcode Lottery were commonly cited examples). In terms of the content analysis, 88% of adverts shown on TV and radio within the Full Media Deep Dive did contain music.

> ***See all the catchy tunes? – it does get stuck in your head. I mean I know my wee cousin was singing the Gala Bingo advert ever since it started, so it gets annoying after a while, but it does stick. And it's stuff like that, it's like that entices people in because it's so catchy, and it's like, 'Oh, actually, that would be good to play 'cause it's such a good theme tune'.***
> *Young person, aged 13-18*

- Celebrities they knew, adverts with these were difficult to forget or ignore as a result.

> ***D'you know what else is always stuck in my head is that woman, Peggy, fae Eastenders, is it? ... in the bingo advert wi' the big dress...Gala Bingo. That was it. See, that's always stuck in my head – her wi' that big star thing and the big dress...***
> *Young person, aged 16-19*

- Campaign characters. For example, the character young people across the 11-24 age range and adults with mental health problems cited most frequently was the fox in the Foxy Bingo advert. Participants described the character as being "cute", "adorable" and "funny", and also spoke of its dancing. Across all participant categories, characters from Paddy Power, Gala Bingo and the National Lottery were also cited as being memorable.

> ***I can remember a man with a fox's head on encouraging me to gamble.***
> *Mental health group 2*

> ***Well I know the Paddy Power one is the Irish guy, it's his face 3 times, it's like a slot machine.***
> *Young person, aged 12-13*

- Repetitive messaging around free bets was also highlighted by participants as a potential draw to gamble. The salience of these messages is supported by findings from the content analysis, as almost half (44%) of the creatives within the Full Media Deep Dive referred to a free or matched bet and 47% of all Tweets analysed contained reference to a free or matched bet.

Figure 7.3: Examples of adverts with memorable features

Where were you? *"Thornton services"*
What were you doing? *"Going to get some food"*
Where did you see the ad? *"In a shop"*
What do you like about the advert? *"The football players that you can recognise"*
What do you dislike about the advert? *"The background colour"*
After seeing it, what do you want to do now? *"Nothing"*
Lancaster, male, age 14

"it's something for free… which people go for"
Lancaster, female, age 39, problem gambler

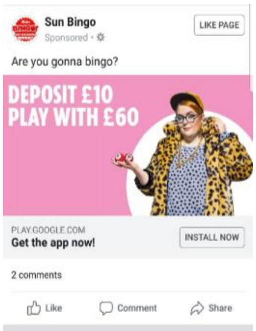
"I like the advert because it gets my attention as I play lottery scratch cards and dream of a big win…it's so hard to get a big win in reality. They promote these big wins but never tell you how little or low odds you have of winning. It glamorises the big win in a sense. It made me think about playing lower jackpot scratch cards to have a chance of some kind of win instead of chasing millions."
Glasgow, Male, Aged 36, Routinely struggling with money

7.3.3 Some adverts successfully broadened the appeal of gambling to new audiences

Participants provided examples of being attracted to ads that broadened the appeal of gambling beyond stereotypical boundaries, and therefore potentially drawing in new customers. For example, attempting to create a shift in the perceptions of gambling as a pursuit mainly for older men, taking place behind closed doors in a bookmaker's shop; to an activity with a much broader constituency including women and younger people, taking place in more open and sociable contexts. Advertising with this purpose included sponsorship of mainstream, primetime or more female-oriented TV programmes, and tie-ins with mass market brands. This also included brands who adopted more youthful styles of advertising and brand images. eSports also serves as an example of this.

Figure 7.4: Examples of gambling adverts appealing to new audiences

"I was in bed scrolling through Facebook and saw this ad. It appeals [because I like] Game of Thrones and provides an interesting take on gambling I've never seen before -betting on the outcome of a TV show. I also like how unique it is and how interested I am in this particular bet since it's predicting something I'm interested in. The odds advertised could be better. Also what is being betted on could be a bit ambiguous depending on how the show ends when you consider how Game of Thrones might end but I will consider maybe putting down a small bet, just for fun. I almost never bet so this is pretty impressive"
London, male, age 17



"You know a lot of bingo and sites like that, it's more really colourful and in your face. It makes me want to play bingo every time I see a bingo ad"
Rhyl, female, age 24, infrequent gambler

7.3.4 As well as seeking to appeal to new audiences, gambling adverts created a sense of community among audiences through good causes, celebrity endorsements and showing people having a good time together

Participants shared examples of gambling advertisements that appeared to make people feel they can be a part of something bigger, a community. As discussed above this was done for gamblers by creating a community of skill. Advertising with celebrity endorsement also achieved this community spirit for football fans, who already felt a sense of connection to football pundits and other personalities with credibility in football. These endorsements were powerful in supporting ideas about the skill, knowledge and dedication linked to being a football fan.

The prevalence of these features was evident within the content analysis which found that a third (33%) of creatives within the Full Media Deep Dive featured celebrities – these were often sports stars across horse racing and football, though major and minor celebrities from television and film also featured. This was less of a feature across the Twitter Deep Dive dataset, with 19% of Traditional Content Marketing Tweets containing celebrities; again, where these did appear these were most frequently sport stars.

However, showing friends or groups of people having a good time together, having a party, and celebrating winning also had this effect. The impact of this was noted by children and young people, as well as vulnerable adults.

A sense of social connection and community was also achieved through linking to an appeal or a cause relevant to their audience. Examples included the Scottish Children's Lottery, which has charitable links that participants could identify with. One of the major sports betting brands was also linked to addressing homophobia in football, which had a positive impact for many participants.

Figure 7.5: Examples of adverts that created a community spirit

Where were you? *"Home"*
What were you doing? *"Watching the Chase"*
Where did you see the ad? *"TV"*
What do you like about the advert? *"The man spoke about his friend being family which is sweet"*
What do you dislike about the advert? *"Nothing in particular"*
After seeing it, what do you want to do now? *"I would want to see my grandad"*
Lancaster, female, age 14

Where were you? *"Home lounge"*
What were you doing? *"Watching tv"*
Where did you see the ad? *"TV"*
What do you like about the advert? *"How the guy said he would treat his friends because they are like family to him"*
What do you dislike about the advert? *"Nothing"*
After seeing it, what do you want to do now? *"Reminded me to get my lottery ticks"*
Lancaster, female, age 66, Economic circumstances have recently changed, frequent gambler

7.3.5 References to good causes and credible celebrities also created trust with audiences

Gambling adverts that referenced good causes or featured celebrity endorsements created trust among viewers. These associations made participants feel that the adverts were credibile and authentic, and therefore increased their trust of gambling brands. Another way trust was built in gambling adverts was through showing a positive result of gambling in an advert, promoting winning. It was thought to be more authentic to have 'ordinary people' winning large prizes, and participants said that it could encourage people to gamble in the hope of replicating this success and giving people the impression that 'that could be me'. Although the presentation of winners was found to be a less prominent feature in the content analysis, it was identified in seven per cent of the Full Media Deep Dive. This was most apparent in adverts for lotteries, including references to collective winners, or individuals receiving the jackpot.

> ***Harry Redknapp advertises gambling…it can't be such a bad thing (to do).***
> *Male, 36, Glasgow, routinely struggling financially*
>
> ***There's that Lottery advert…and all the people come out the door and it's like happy families that have just won like £15,000 and you're like oh, that's so sweet!…The *Postcode Lottery. Yeah that's it. You're like that's so nice, that woman has been betting for like maybe 20 years and she's finally won! Even though she's been putting a tenner on like every week, it's kind of like, that's good… Yeah, it's seen as a positive thing when it's kinda not.***
> *Young person, aged 19-23*

7.3.6 A less common outcome of gambling adverts was providing participants with a form of escape and distraction

There were a handful of examples of gambling adverts recorded by participants where the adverts focussed on providing an escape, these had high production values. With these adverts, participants highlighted that they appeared more like a film than an advert, which they found surprising and engaging. This type of advertising did not feature heavily in the content analysis, as few ads were judged to be glamorous. Within the Full Media Deep Dive, four per cent of creatives plausibly suggested that gambling was glamorous and desirable, or that it could lead to a glamorous and desirable lifestyle.

Figure 7.6: Examples of adverts that were seen as film-like

"It could be out of a film- there was dramatic music, the ad was good, it looks like they spent a lot of money on it - made me think the gambling might be more safe because of this"
Lancaster, female, age 18

"(The ad had) beautiful scenery from an infinity pool. A bit like a dream if you win the lottery…it made me want to play the Euromillions"
Birmingham, Female, Aged 56, Has difficulties with comprehension.

7.3.7 Gambling adverts were perceived to portray gambling positively, whilst detracting from the risk of gambling itself

Gambling advertising also led to some misperceptions, including the potential risks involved. Participants noted examples of gambling adverts that appeared to detract from the gambling itself, influencing the way in which it is perceived as a leisure activity.

- Many children commented on ads which promoted the 'fun' aspect of activities with some being attracted to this type of messaging whilst others were more savvy about how it downplayed the risks involved in gambling. Young people and those participants who had experience of mental health problems agreed that the gambling marketing had a positive tone, and stressed the enjoyment and happiness resulting from participating in gambling activities.

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

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

- Humour used in adverts also made gambling seem like a less serious and therefore a more acceptable activity to young people, impacting their perceptions of it. Humour appealed to all participant categories and was thought of as a widely popular strategy. Adults with experience of problem gambling argued that some of the adverts deliberately downplayed the actual gambling activity at the expense of humour, but they lingered in the mind and could potentially influence gambling behaviour in the future. In the social media analysis we found that 75% of the Traditional Content Marketing Tweets, and 36% of the eSports Content Marketing Tweets used humour. However, humour was less of a feature within the Full Media Deep Dive, contained in only 12% of adverts.

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

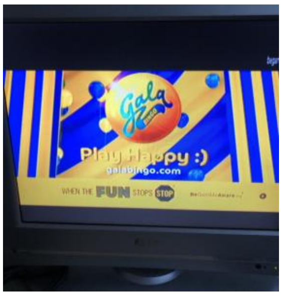
  I suppose some of them, I didn't think of it before until now, it's sort of making it humorous rather than serious…The fox one…when I thought of that I thought it was funny because I could see the advert in my head, and I suppose gambling is quite a serious thing. That one is trying to make it funny, so it's okay to do it.
  Young person, aged 19-23

- Participants were drawn to adverts which made online gambling appear as a sociable and interactive activity: this was through utilising social connectedness with football fans or with brands offering online bingo frequently, highlighting its sociability.

As noted in section 6.2.5 above; misperceptions of the risk of gambling were compounded as participants often felt that safeguarding messages included within the advertisements were inadequate. This is supported by analysis of advertising content, in which the Full Media Deep Dive found poor presentation of age warnings, risks or terms. In 14% of cases there were no age warning messages present, 14% where there was no reference to messages that promote lower risk gambling and support (e.g. begambleaware.org), and 11% with no terms and conditions (where these should have been present). Both the Twitter and sport sponsorship analysis also found few examples of age restriction and messages that promoted lower risk gambling.

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

Figure 7.7: Examples of adverts which focus on fun



Where were you? ***"At home in bed"***
What were you doing? ***"I was falling asleep"***
Where did you see the ad? ***"TV"***
What do you like about the advert? ***"Fun ….. It's not exactly gambling but it's a form of gambling …. It's a bingo commercial "***
What do you dislike about the advert? ***"Came on too late"***
After seeing it, what do you want to do now? ***"Go to bed "***
London, male, age 46, struggles with money, high risk gambler

"It's always been a brand that stands out. In general the tombola adverts are normally quite… not personal but… they seem to appeal to people, always lots of people in their adverts playing, having fun and that"
Rhyl, female, age 24, infrequent gambler

7.4 Impact of advertising relative to other factors

ScotCen conducted statistical analysis to examine the role of advertising relative to other factors for those aged 11-24. Two statistical models were conducted: i) among all aged 11-24, what factors might be associated with whether they gamble now or not (Table 7.2) [97]; ii) among those who currently don't gamble, what factors might be associated with whether they are susceptible to gamble in the near future (Table 7.1).[98]

Logistic Regression

Tables 7.1 and 7.2 provide an overview of the results of a logistic regression, run by ScotCen as part of survey of children, young people and young adults aged 11-24.

Logistic regression is a statistical method for analysing a dataset in which there are one or more independent variables that might determine an outcome. For the purpose of this study, the logistic regression helps identify the extent to which exposure to and interaction with gambling advertising and marketing is associated with current and likely future gambling activity, compared with other factors such as age, gender and parent gambling.

For ease of reference, the tables presented here show 'step 4' in the logistic regression, this is the stage of the regression in which the potential association of all factors are considered together. The presentation of Odds Ratios shows the relative importance of a factor when all other variables have been controlled for. Higher Odds Ratios tend to indicate stronger positive associations, though it is important to note that there is statistical variance between found differences.

The tables therefore also provide an assessment of whether the associations are statistically significant (i.e. not due to chance). Where odds ratios are greater than 1 and a difference is identified as statistically significant, that indicates an increased likelihood of being a current gambler or of being susceptible to gambling compared with the base category. Where the difference is statistically significant but the odds ratio is less than 1, that indicates a decreased likelihood.

It should be noted that this study is a cross-sectional design (i.e. interviewed respondents at one point in time), as such it is impossible to determine cause and effect between variables. Therefore, the regression models report statistically significant associations, and not causal effects.

7.4.1 There was a strong association between advertising and susceptibility to gambling in future[99]

ScotCen's analysis shows that exposure to and engagement with gambling marketing was significantly associated with gambling susceptibility when demographic factors were controlled for. The likelihood of a current non-gambler spending

[97] Respondents were asked how often they took part in gambling activities. Those who reported that they never usually took part in any gambling activities were classified as 'not current gamblers'. All other responses (ranging from once a month or less to every day) were considered to be current gamblers. Respondents did not have to have spent their own money on gambling activities to be classified as current gamblers.

[98] All respondents were asked whether they thought that they would spend money on gambling in the next year. Those who were not current gamblers were categorised as susceptible to gambling within the next year if they selected the answer 'definitely yes', 'probably yes' and 'probably not', and not susceptible if they opted for 'definitely not'. This approach to classifying susceptibility has also been used in relation to youth susceptibility to consume alcohol: Critchlow et al, 2019. https://eucam.info/2019/02/20/nathan-critchlow-et-al-2019-participation-with-alcohol-marketing-and-user-created-promotion-on-social-media-and-the-association-with-higher-risk-alcohol-consumption-and-brand-identification-among/

[99] All respondents were asked whether they thought that they would spend money on gambling in the next year (this is used as a measure for susceptibility to gamble in the future). Those who were not current gamblers were categorised as being susceptible to gambling within the next year if they selected the answer (definitely yes, probably yes and probably not), and not susceptible if they opted for 'definitely not'. This approach to classifying susceptibility has also been used previously in relation to youth susceptibility to consume alcohol and tobacco, and is why a similar approach has been taken for this study. Examples of this approach being used in other similar studies are as follows: Pierce et al, 1996 (https://psycnet.apa.org/record/1996-

their own money on gambling in the near future increases significantly among those who have been exposed to a high volume of gambling advertising over the past month. Those who were susceptible to gambling in the future recalled seeing a mean of 6.8 different types of advertising, compared with an average of 5 among those who were not susceptible to future gambling. Other factors associated with gambling susceptibility include engagement with marketing and brand awareness.

Susceptibility to gambling was also significantly associated with the money, excitement and social subscales of the GOE Scale (which measures expected outcomes of gambling), age and gender.

The combined model at Table 7.2 included results from 396 aged 11-17 and 227 participants aged 18-24. The difference in age was significantly associated with gambling susceptibility; however, once age is controlled for within the model, the variables related to advertising are still statistically significant, meaning they are not driven by underlying differences associated with age.

Moreover, the attitudes and gambling behaviour of parents and peers were not statistically significant in predicting susceptibility to gamble.

Table 7.1: Logistic regression to predict gambling susceptibility among non-gamblers aged 11-24

Logistic regression – Step 4 (Base 623) ** Significant at the 10% level* *** Significant at the 5% level* **** Significant at the 1% level*	Odds ratios
Factors which are statistically significant	
Number of types of marketing seen	1.792**
Age	1.716**
Participated in marketing	1.715**
Number of brands recognised	1.64**
Gender	1.405*
Mean score for GOES Money items	1.283***
Mean score for GOES Social items	1.247*
Mean score for GOES Excitement items	1.227*
Factors which are not statistically significant	
Peers gamble	1.616
Gambling acceptable to at least one parent	1.385
Region	1.247
Either parent gambles	1.235
Mean score for GOES Ego items	1.037
Positive towards advertising (Base: Negative or neutral towards advertising)	1.009
Area deprivation (Quintile 1)	1.002
Mean score for GOES Escape items	0.929
Lives independently from parents	0.495

06101-004), Mutti et al, 2017 (https://academic.oup.com/heapro/article/32/4/650/2950997) and Critchlow et al, 2019 (https://eucam.info/2019/02/20/nathan-critchlow-et-al-2019-participation-with-alcohol-marketing-and-user-created-promotion-on-social-media-and-the-association-with-higher-risk-alcohol-consumption-and-brand-identification-among/)

7.4.2 Current gambling was most strongly associated with gambling behaviour of peers, though ads remain important

Whilst susceptibility to future gambling is most closely associated with exposure to and engagement with marketing, the factor most closely associated with current gambling was having friends who also gamble. Those who have a close friend who gambles have six time the odds of being a current gambler compared with those without.[100]

The qualitative research provides some context for the strength of association with peers, particularly within sport. For several participants, gambling had become embedded within a social routine, and was a regular and important part of the sporting experience: for example, placing accumulator bets ahead of a weekend of fixtures, or betting online or at a match. Gambling within sport was also linked to a perceived sense of skill over luck, and was often framed as such among friends. A number of sports fans, including those identified as problem gamblers, believed that it was possible to win if you had the relevant knowledge and expertise. However, although some young people felt there was a pressure to gamble from friends during big events, others felt this was less intense than peer pressure to take part in other activities including consuming alcohol and tobacco.

> ***There is a bit of pressure to gamble during big events, but there's more pressure to drink than gamble.***
> *Birmingham, Female, 22*

Table 7.2: Logistic regression to predict current gambling among those aged 11-24

Logistic regression – Step 4 (Base 1086) ** Significant at the 10% level* *** Significant at the 5% level* **** Significant at the 1% level*	Odds ratio
Factors which are statistically significant	
Peers gamble	6.37***
Age	2.49***
Either parent gambles	2.308***
Number of brands recognised	1.951***
Gambling acceptable to at least one parent	1.49**
Participated in one type of marketing	1.442*
Mean score for GOES Excitement items	1.354***
Mean score for GOES Money items	1.338***
Mean score for GOES Social items	0.716***
Factors which are not statistically significant	
Lives independently from parents	1.432
Gender	1.046
Mean score for GOES Escape items	0.985
Mean score for GOES Ego items	0.915
Area deprivation (Quintile 1)	0.881
Positive towards advertising	0.878
Region	0.852
Number of types of marketing seen	0.815

[100] Within the survey: 84% of those aged 11-24 who had a closest friend who was a gambler were current gamblers themselves, compared with just 23% of those with a non-gambling close friend.

The gambling behaviour and attitudes of parents was also associated with current gambling among 11-24 year olds. Over half of those who had a female carer who gambled were current gamblers themselves (56%); a similar proportion (52%) were current gamblers where the male carer also gambled. Perceived parental acceptability of gambling also had a significant association with the current gambling status of those aged 11-24. As noted in section 5.4 above, many participants noted that parents had often been responsible for introducing them to gambling at a young age.

However, advertising remains an important part of a complex and multifactorial narrative. Although reported awareness of gambling marketing and advertising was not associated with current gambling, both engagement with marketing activities of gambling operators and brand awareness is significantly associated. This does not demonstrate causation, yet the significance of marketing engagement and brand awareness warrants further investigation. As explored in section 7.2 above, among those who currently gamble, advertising helps remind people of events and of specific odds and opportunities to gamble; in turn helping to reinforce positive association with gambling.

As was the case for predicting susceptibility to gamble, current gambling was also associated with age, and with those who have a more favourable opinion of the financial benefits and the extent to which gambling can be fun (as measured by the GOES scale).[101] Furthermore, as was the case in the gambling susceptibility model, any significant associations are statistically independent of age and are not driven by any underlying differences in levels of current gambling associated with age.

[101] The survey shows that appeal of gambling in these domains is strongest among those who engage with marketing; suggesting that this cycle helps reinforce itself. However, it is important to note that overall, relatively few respondents to the survey gave a positive response to gambling expectancies across the GOE Scale.

8 Conclusions and recommendations

This chapter presents conclusions in response to the key research questions of the study, as outlined in chapter 2. It should be noted that the key findings, conclusions and recommendations synthesised in both reports represent the views of Ipsos MORI, and do not necessarily represent the views of all the authors who contributed to the research study.

8.1 Discussion

8.1.1 Conclusions

The research points to a clear growth in the volume of gambling advertising and marketing in recent years, and suggests that the amount of exposure to gambling advertising and marketing is significant. Although the research found no evidence of gambling adverts being placed within children's media, exposure among children and young people remains high. The multiple formats of exposure are apparent within ScotCen's survey of those aged 11-24, and supports the claims of participants from qualitative research of the ubiquitous nature of gambling advertising. Television, social media and the high street were the most popular channels of seeing gambling advertising. Although there is a strong association between sport and gambling advertising, exposure to gambling brands is not restricted to key games and events, and spans wider than the betting sector. As a result, brand awareness and recognition of gambling companies, including lotteries, is high – even among those who do not currently gamble.

Although many participants claimed to dislike, and to be able to ignore gambling advertising, all participant groups were able to point to themes and features within gambling advertising that they found appealing. The appeal of these features was not unique to children, young people and vulnerable adults; this therefore suggests that it is challenging to define appeal of advertising in binary terms, based purely on age.

Engagement with gambling marketing was low, with relatively few instances of participants (outside of frequent and problem gamblers) reporting they had engaged in gambling as a direct result of seeing an advert. Given that many of these participants are below the legal age to gamble, this is perhaps not surprising. However, the qualitative research highlighted a range of emotional and cognitive responses to advertising which were claimed by participants to have changed their attitudes (mostly positively) towards gambling in a number of ways. The cumulative impact of exposure to gambling advertising is further evident within the statistical analysis, where among those who do not currently gamble, exposure to gambling advertising was significantly associated with whether or not they were susceptible to spending money on gambling in the future.

The relationship between advertising and actual gambling behaviour is complex and multifaceted. The attitudes and gambling behaviours of peers and carers are also important in shaping behaviour. For example, whether or not a close friend or carer gambles, or is likely to find gambling acceptable, is closely linked to recalled exposure to advertising and brand awareness, and is also significantly associated with whether or not an individual gambles. This suggests that changes to advertising practices should be an intrinsic part of a wider policy initiative that also considers the influence of peers and family members, in order to help reduce the plausible risk of future gambling related harms among children, young people and vulnerable adults.

The findings of this research will and should be seen in the context of wider trends – for example, the overall number of young people reporting taking part in gambling has fallen in recent years despite a considerable increase in spend and volume of advertising. This decrease is likely to be influenced by a multitude of factors, which it is not appropriate to speculate about here. Furthermore, it's important to note that the research would benefit from appropriate comparisons with other sectors – it is otherwise currently difficult to judge whether findings in relation to exposure and engagement of gambling advertising are favourable or not.

Nonetheless, triangulation of the evidence produced by this research project would suggest that there are reasonable grounds for concern. In the absence of conclusive longitudinal research and wider comparisons, there is a clear link between gambling advertising and the attitudes, current and likely future behaviours of children, young people and vulnerable adults. This is not to say that gambling cannot be enjoyed recreationally at a legal age; however, it is important to note that these are all groups who have already been identified as more likely to experience gambling disorder or be vulnerable to gambling related harms.[102]

8.1.2 Looking forward

The application of the *precautionary principle* advocates taking preventative measures even if cause and effect relationships are not fully established.[103] Within this context, the research findings of this project suggest that action would be warranted in a number of areas:

- The case for reducing exposure to gambling advertising: exposure to advertising is high across all age groups with gambling advertising predominantly found in public places rather than specifically child-friendly places. This suggests that current rules to restrict exposure have a limited impact, including the '25% rule' aimed at excluding advertising from media with an audience consisting of a 25% or more of children and young people. The research suggests that sheer exposure to gambling advertising can have an impact on attitudes towards the prevalence and acceptability of gambling, and in turn the susceptibility to gamble in the future. Furthermore, the rise of new forms of gambling marketing through social media have increased the ways in which children, young people and vulnerable adults can engage with gambling brands, often innocently, in such a way as to develop brand loyalty.

- The case for reducing the appeal of gambling advertising: rules in place to reduce the appeal of gambling advertising currently assume that there are a set of specific features that children and young people find more appealing than adults do. Current regulations require clarification in areas such not using sports stars under the age of 25 or child-like images in new sectors such as eSports. However, this research suggests that appeal should be extended to other common features, and particularly adverts that emphasise fun, a sense of reduced risk, and financial reward. Furthermore, these features may play on the susceptibilities of children, young people and vulnerable adults – especially where understanding of risk is poor. The appeal of adverts may not always elicit an immediate gamble; however, the appeal of adverts is successful in eliciting emotional responses that in turn are likely shape attitudes to gambling and the chance that an individual will consider gambling in the future.

- The case for improving consumer protection messaging within advertising: the research points to low and mixed understanding and awareness of risk; moreover, participants proactively called for advertising to place greater emphasis on risk (including chance of winning) rather than on fun and excitement. Only around half (53%) of those aged 11-24 were aware of labelling to indicate that gambling is not legal for under 18s, and even fewer recalled messages about safer gambling. Furthermore, the content analysis demonstrated poor visibility of consumer protection messages across a range of media formats. Greater action is required to identify the best ways to help consumers make more informed judgements when they are exposed to an advert which they find appealing.

- The case for improving wider education initiatives: as a legitimate leisure activity, it is realistic to expect that children, young people and vulnerable adults will be exposed to some form of gambling advertising, marketing or sponsorship (this is currently most evident among sports fans). Continued efforts to improve education relating to gambling and risk are therefore imperative in helping young and vulnerable adults make better informed assessments about whether or not to spend money on gambling. These initiatives should be extended to consider

[102] As a result of recommendations from Per Binde's 2014 review, the original specification for the project asked research to focus on key groups of concern: children (aged 11-18), young people (aged 18-24) and vulnerable adults (those living within economic constraints, those with a limited capacity to understand information contained within gambling marketing and advertising and those already experiencing problems with their gambling). The link to the project brief can be found here: https://about.gambleaware.org/media/1538/project-brief-41-advertising-young-and-vulnerable-people.pdf; and to Per Binde's review: https://about.gambleaware.org/media/1165/binde_rgt_report_gambling_advertising_2014_final_color_115p.pdf. . Also see Sharman, S, Butler K, & Roberts, A (2019) Psychosocial risk factors in disordered gambling: A descriptive systematic overview of vulnerable populations. Addictive Behaviors, 99

[103] The classic definition of the precautionary principle was established at the 1992 Rio Declaration on Environment and Development. This states that "*Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation*". The principle has more recently been applied to wider public health concerns (for example see Kriebel and Tickner, 'Precautionary Principle and Public Health' September 2001, Vol 91, No.9, American Journal of Public Health, 1351).

the influence of parents and peers too, who are a key route for exposure to gambling brands and who were strongly associated with current gambling activity among children and young people.

- The case for improving understanding through further research: it is important to note there are a number of limitations to this study. This is a cross-sectional design which does not benefit from a longitudinal assessment of the impact of exposure to adverts. Given that exposure to adverts was significantly associated with susceptibility to gamble rather than actual gambling behaviour, further insight is needed into the mechanisms and circumstance in which children sustain and convert any initial interest in gambling into future action. The research would benefit from additional statistical analysis of the relationship between advertising and gambling behaviour among vulnerable adults, and of the relationship between frequency of exposure to advertising and current gambling activities. This will help establish the extent to which adverts may or may not be related to problem gambling. Finally, it has not been possible within the scope of this project to fully assess click-through rates of online adverts – this may improve understanding of the risk of exposure to ads online, and the appeal of different features.

8.2 Recommendations

Based on these findings, Ipsos MORI has identified 18 recommendations that warrant further consideration among industry, regulators and researchers. These are intended to help stimulate collective discussion and action. We welcome the opportunity for others to build on and to challenge our suggestions.

8.2.1 Recommendations for gambling, advertising, technology and social media industry

1. Make better use of technology to minimise the risk of children, young people and vulnerable adults' exposure to gambling advertising This could include using adtech[104] to positively exclude certain online profiles from seeing gambling ads (including those with a child-like persona and those who have sought help for problem gambling), and working with platforms such as Twitter to make use of features that allow better age verification for account followers.

   Since the Interim Synthesis Report, Ipsos MORI note that a number of positive steps have been taken by industry to explore the use of technology in this regard. The Betting and Gaming Council have launched Safer Gambling Commitments including a commitment to work with advertising bodies to explore using adtech to prevent under-18s seeing gambling adverts online. [105] *The Gambling Commission have launched their advertising technology challenge*[106] *and they have also released guidance for consumers on how to limit the amount of gambling-related content they are shown on Twitter.* [107]

2. Integrate more explicit, more frequent and more visible references to risk and safer gambling within advertising This signposting could include dedicating more visual presence to messages about safer gambling within current ads, and ensuring that clear age restrictions are evident. Given the spontaneous demand from participants, this commitment should also extend to supporting independent campaigns that highlight risks and promote safer gambling.

   Ipsos MORI note industry's commitment to the launch of the Safer Gambling campaign since the Interim Synthesis Report was published in summer 2019; alongside other commitments. It remains important to consider commitments both to independent campaigns and within marketing content produced directly by gambling companies.

[104] 'Adtech' stands for advertising technology and refers to different types of analytics and digital tools used in the context of advertising. This includes the systems used to direct advertising to individuals and specific target audiences.
[105] https://bettingandgamingcouncil.com/safer-gambling/
[106] https://www.gamblingcommission.gov.uk/news-action-and-statistics/News/gambling-commission-sets-the-industry-tough-challenges-in-race-to-accelerate-progress-to-raise-standards-and-reduce-gambling-harm
[107] https://www.gamblingcommission.gov.uk/news-action-and-statistics/news/2020/Gambling-Commission-releases-guidance-to-help-consumers-limit-gambling-related-content-on-Twitter.aspx

3. **Consider how best to minimise the risk that adverts in the wider public arena may play on susceptibilities of children, young people and vulnerable adults.** We suggest that even greater differentiation should be made between the themes and features used in adverts that have a high volume or proportion of children and young people within the audience, compared to the themes and features used to promote gambling in exclusively adult audiences. Efforts should be made to increase the clarity of risk where it is likely some groups may misunderstand financial incentives, and being cautious not to over-emphasise elements of fun, enjoyment and financial reward.

4. **Reduce the volume of gambling advertising and marketing reaching children, young people and vulnerable adults.** This should explicitly consider the likely impact of repeated exposure across multiple formats, including through sponsorship and on the high street.

8.2.2 Recommendations for policy and regulation

5. **Establish whether issues identified within the research are due to poor compliance with existing regulations and guidelines, or whether further guidance is needed from regulators, or indeed whether it is time for new regulations.** Regulatory issues identified for attention include the use of individuals under 25 in gambling adverts, labelling of ads on social media, the low visibility of consumer protection messages, and determining whether financial incentives are presented clearly enough for users to understand, so that they do not exploit the credulity or lack of understanding among children, young people and vulnerable adults.

6. **Consider whether 'particular appeal' remains a useful definition for protecting children and young people from the potentially harmful impacts of gambling advertising, given that advertising content that appeals to adults may appeal to younger audiences too.** Regulators could consider the extent to which features beyond child-friendly images and language are likely to also generate significant interest to children and young people – even if they are not the intended target audience – and how best to accommodate this alongside other aspects of the ad, such as likely exposure.

   Since the Interim Synthesis Report, Ipsos MORI note that CAP have been assessing the social media content identified as part of study in relation to 'particular appeal'.[108]

7. **Consider whether the '25% rule' remains an appropriate criterion for deciding which gambling ads can be legitimately marketed to a mass audience.** Based on the findings from this research, further discussion is required to test the assumption that limited harm is caused from exposure to advertising where children and young people make up no more than 25% of the likely audience; and whether this threshold should be reduced and/or expressed as an absolute number rather than a percentage.

8. **Ensure that existing regulations and codes of practice are applied to the licensed eSports betting market as it develops** Where eSports betting operators are licensed to transact with consumers within Great Britain, care must be taken to ensure that existing regulations and best practices are followed, especially concerning the use of child-friendly images and inclusion of individuals under 25.

9. **Maintain careful oversight over unlicensed operators online, particularly in relation to eSports.** The unlicensed remote eSports betting market requires close scrutiny to ensure that it is not contravening British law by allowing consumers in Great Britain to access its gambling facilities. This is particularly important as the research found evidence of children being exposed to, and interacting with, Twitter accounts advertising unlicensed eSports betting. The regulator should maintain a robust approach in deterring and combating unlawful gambling activities.

10. **Consider the potential role and value of education initiatives.** Many participants reported exposure to gambling activity often in informal settings, at a young age, and encouraged by family and friends. Moreover, understanding of gambling risk amongst children, young people and vulnerable adults was mixed. Education initiatives therefore could include content for both parents and young people to promote a better understanding of gambling-related

[108] https://www.asa.org.uk/uploads/assets/c389c59b-8d64-4f39-afffbd93dca42df6/Gambling-and-children-update-response-to-GambleAware.pdf

harms and risks, and of odds and financial offers stated in marketing. These initiatives could also raise awareness of the potential impact of content marketing techniques designed to build brand loyalty and awareness.

8.2.3 Recommendations for research

11. Establish a longitudinal research project that would allow for a more robust assessment of the impact of advertising on children, young people and vulnerable adults. This could include a young cohort that would enter adulthood (and legal age to gamble) during the lifecycle of the project to better understand the long-term impact of exposure to young people who are less likely to be able to act immediately on their early exposure. This should include monitoring of the new framework for measuring gambling relating harms for young people.[109]

12. Establish better benchmarks against which the volume of gambling advertising in the UK, and likely exposure to children, young people and vulnerable adults, can be judged. The media monitoring work currently lacks comparisons to other sectors (such as alcohol), and to other countries. This will help assess for example whether the trends experienced in the UK are similar or unique compared to others, and whether any media channels or gambling sub-sectors are more or less prevalent compared to other regulatory frameworks. Furthermore, measures of exposure and engagement with gambling advertising would benefit from an agreed reference to other relevant sectors or product categories.

13. Commission content analysis on a regular basis. This would provide an up to date assessment of the themes and features used to market gambling, and would establish whether industry has successfully sought to reduce risk of appealing to susceptibilities of children, young people and vulnerable adults, and sought to improve consumer protection messages.

14. Commission research to better understand the impact of improved visibility of consumer protection messages. This would include exploration of the extent to which exposure to varying visibility of age ratings and other health warnings or promotion of safer gambling messages reduces susceptibility to gamble.

15. Improve understanding of exposure to online advertising, including social media. This could include integrating purchase behaviour as part of avatar online profile (not just browsing behaviour and search queries) to establish whether this is likely to generate a greater level of gambling ad exposure. Moreover, the current avatars research excludes social media advertising – this was a key source of exposure among participants within the qualitative strand of research.

16. Explore prevalence of other forms of less featured advertising, including in-app adverts, and notifications. Current media monitoring does not capture new mobile forms of advertising; furthermore, these forms of advertising were not mentioned spontaneously by participants in the qualitative research. Further research is required to better understand the themes, features, appeal and prevalence of this form of advertising.

17. Improve understanding of engagement with eSports advertising on social media. Further work is required to better understand how and why people are engaging with this content, and the prevalence and penetration of gambling related content within the wider eSports community.

18. Improve understanding of engagement of online ads relative to other forms of advertising. It is likely that this will involve direct engagement from the industry to help establish click-through rates for display marketing and pay per click advertising, especially in public online areas (for example sports news sites) rather than specialist gambling interest areas (for example odds checking sites). This will help establish the prevalence of engagement beyond survey research, including exploration of conversion through to opening an account or playing a gamble, rather than just clicking on the ad.

[109] This can be found here: https://about.gambleaware.org/media/1937/measuring-grh-in-cyp-a-framework-for-action.pdf

9 Methodology summaries

9.1 Strand 1 – Literature review

Led by: University of Stirling

Objective: To provide an overview of the most relevant literature on gambling advertising in relation to children, young people and vulnerable groups, building on Binde's 2014 review.

Dates: The literature search was run in April 2018 and explored research published between 2013 and 2018 (research that would not have been included in Binde's 2014 review).

Data sources: 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).[110] [111] [112] Search results were limited to English language only. 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).[113]

Relevant grey literature (non-peer reviewed) reports (n=10) collected in the development stage of the project through ad hoc searches and recommendations by the wider research team were also included in the data extraction table. Results were uploaded to reference management software and de-duplicated.

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

Volume of data included: The final set of studies (n=42) met the relevancy criteria and were included for full data extraction. Grey literature from the UK and Australian reports that were most relevant to the review were prioritised.

Data analysis: A data extraction spreadsheet (summarising the study aim, sample, design, county of origin, and key findings of papers) was created to extract relevant data from papers included for full review. Findings were organised to answer the eight research questions. The type of people the study was targeting was classified. There were several studies that focused on children, adolescents and problem gamblers. There were none that looked specifically at the other vulnerable groups of interest to the research, people living in economic constraint, or people with limited capacity to understand information.

[110] Binde P. 2014. Gambling advertising: A critical research review. 2014.
[111] G. V. Children and Young People's Gambling: Research Review. 2016.
[112] Parke A, Harris A, Parke J, Rigbye J, Blaszczynski A. RESPONSIBLE MARKETING AND ADVERTISING IN GAMBLING: A CRITICAL REVIEW. Journal of Gambling Business & Economics 2014; 8(3): 21.
[113] Binde P. A bibliography of empirical studies on gambling advertising

9.2 Strand 2 – Media monitoring

Led by: Ipsos MORI, using Ebiquity's in house advertising database, Portfolio.

Objective: To assess volume and frequency of traditional gambling-related advertising in the UK across different media types using spend data. Types of media included in this analysis are listed in Table 1.

Dates: High level spend data was looked at from 2015-2018, as well as a more in-depth analysis of the data available from October 2017 to September 2018.

Data source: Portfolio is an advertising research platform, which links advertisements to their placement in the media and the standard spend rate for these advertisements.

The methods used by Ebiquity to monitor advertising and generate estimates of spend are complex. A variety of methods are used to calculate both the spend and frequency data across each of the media types. Whilst this database is extensive, it is unable to capture all advertising; in fact no organisation can truthfully claim to capture every creative commissioned and accurately identify the exact spend per brand.[114] This database only provides online data on 'displayed advertising'; this excludes advertising on social media and 'paid search' advertising. Furthermore, other marketing, such as sponsorship of sports teams, was also not captured whilst monitoring media advertising.

This data collection is for the UK only, and the results do not show a comparison to other sectors and therefore acts as a standalone piece of research looking specifically within the gambling industry.

Table 9.1 below gives an overview of how the frequency and spend of each media type is generated.

Table 9.1: Portfolio data generation by media type (volume and spend)

Media Type	Process for capturing volume of creatives	Spend calculation
Television	Proprietary computer technology is used to capture and record TV creative activity including advertising and sponsorship idents. This is collected across 41 TV channels.	BARB[115] data on the number of viewers for TV advertising spots is combined with monthly station prices gathered from national broadcasters and agency groups to calculate TV advertising spends.
Press	380 publications are scanned to identify advertisements; this includes magazines and regional supplements.	Actual averaged page and fractional rates for key National Press newspaper main sections, Consumer and Business magazines are applied quarterly by publication and format.
Radio	31 stations are monitored over three hour periods throughout the day to pick up the broadest range of breaking ads.	Radio spot advertising spend is calculated using the latest RAJAR[116] data available at the time of booking and the actual station prices derived from the Radio campaign costs benchmarked by Ebiquity Media in that quarter and are adjusted in a range of ±10%. These prices are further adjusted to reflect daypart and day of week demand factors.
Cinema	Creative activity is provided by Pearl & Dean.	Both Digital Cinema Media and Pearl & Dean[117] report spend data split monthly over a campaign's duration.

[114] This is as a result of there being no precise mechanism that has the ability to accurately identify the exact spend per brand.

[115] The Broadcasters Audience Research Board (BARB) is an organisation that compiles television ratings and audience measurement (television viewership).

[116] Radio Joint Audience Research (RAJAR) measures radio audiences in the UK.

[117] Pearl and Dean and Digital Cinema Media are both cinema advertising companies.

Outdoor	Creative activity is provided by the Ebiquity Advertising capture team who cover 2 London boroughs. Coverage includes major rail terminals, commuter stations and supermarkets. Outdoor advertising includes, for example, billboards.	Spend data is sourced from the OAA (Outdoor Advertising Association) which provides weekly campaign costs based on averaged format prices.
Internet	Web spiders capture the display banners from the UK's most popular advertising supported websites.	The number of times an ad is found is taken as a proportion of all the times a site is visited to be the number of times that ad appeared overall. Price points are then used to calculate the overall cost.
Direct Mail	A UK representative panel (of 2,750 homes) is used to collect information on direct mail received. This panel is based on four core demographics, gender, age, social class and region – which are distributed to match those of the UK population. Direct mail is anything mailed to a named individual excluding personal letters, but including items received with utility and services bills or statements. Panel members collect the Direct Mail they receive and forward it to Ebiquity. Calculations are then made to make this data representative of the UK as a whole.	Spend estimates are based on the unit price per mailing (with both postage and production elements) multiplied by the estimated number of individuals mailed nationally.
Door drops	The same household panel that is used for direct mail is used for door drops. Door Drop items are those addressed to 'the occupant', unaddressed and includes loose inserts from free local papers. Calculations are then made to make this data representative of the UK as a whole.	Spend estimates are calculated at 45p per item.

Data analysis: This data was crossed with other variables such as region, type of advert, brand and type of gambling. As well as media type, much of the data was analysed in terms of gambling sub-sector. The definitions for each of these are[118]:

- Bookmakers – any advertising from bookmakers like William Hill, Ladbrokes, Coral etc. promoting betting on sports
- Gaming – any advertising promoting online gambling games (excluding Casino, Poker and Bingo)
- Lotteries – any advertising promoting lotteries
- Mobile Content – including advertising for promotion apps that help with gambling e.g. the Racing Post
- Online Bingo – any advertising promoting bingo but played exclusively online via an app or website
- Online Casino & Poker - any advertising promoting casino games or poker played exclusively online via an app or website
- Pools – any advertising promoting playing the pools.

[118] Not all of these media types are mutually exclusive, however all advertising is assigned to the closest match

9.3 Strand 3 – Avatars

Led by: Ipsos MORI and Ebiquity

Objective: To provide an assessment of the volume and frequency of paid-for gambling-related advertising online, including an assessment of whether behavioural targeting is used within the gambling industry.

Dates: Avatars were in field for 34 days (12 September – 15 October), and visited 150 sites every day. The adverts they saw were recorded.

Each avatar visited both the main page and a subpage of the 150 sites every day. The visits they made to each of these websites did not build into their existing 'personalities' i.e. the avatar personality profile did not change. The times that the avatars visited this list of sites were rotated, so data was collected at various times of the day across each of the websites.

Data sources: The sites that were used to produce the avatar profiles were selected to be representative of the intended avatar profile. These sites were selected using desk research and the comScore[119] top ranking sites for each avatar age band.

During fieldwork, avatars visited 150 sites. This did not include social media sites i.e. the avatars created did not have their own social media accounts. Included within the 150, were 100 top ranking sites, 20 top children's sites and 20 top sport websites. These sites were identified using comScore statistics.

The remaining 10 sites were generated separately using desktop research, the purpose of these was to identify whether there were gambling adverts placed on websites aimed at vulnerable groups.

- 4 gambling help sites e.g. Gamcare, stop-gambling, begambleaware, Telegraph: gambling help page
- 4 sites directed at vulnerable groups e.g. Mind, WebMD: anxiety, Money.co.uk: redundancy, Good Men Project
- 2 debt finance product sites e.g. Amigo loans, Lolly loans

Method: From this ComScore data 10 avatars were generated, alongside a neutral avatar. These consisted of various 'personalities' including children and vulnerable groups. To do this, Ebiquity employed a method known as 'Audience Panel Simulation', which generates the users that are referred to as avatars. Each of these avatars had a specific personality: these personalities are developed through normal browsing activity, akin to the behaviours of a real online user. For example, in order to build an avatar that represents a person with financial problems, the avatar could search online for the following; "Help me with my debt", "How do I take out a loan?".

Table 9.2 below shows the avatars that were generated and the browsing habits that were used to build each avatar. Also included are the research questions behind each of the individual avatars.

Table 9.2: Avatar profiles

Intended Audience Segment Representation	Browsing Habits / Websites	Research Question
Child under 13	Selection from comScore top ranking sites in the 6-12 year old demographic group.	To what extent are children under 13 served gambling adverts? And, are they targeted?

[119] comScore provide audience measurement statistics to allow identification of websites most commonly visited by a certain population: https://www.comscore.com/About

Child under 18 / No Sports	Selection from comScore top ranking sites in the 13-17 year old demographic group, vetted to exclude any sites with sports focus.	Does an interest in sports impact on the extent to which children under 18 are exposed to gambling advertising?
Child under 18 / Sports Fan	Selection from comScore top ranking sites in the 13-17 year old demographic group, including sites with sports focus.	
Young Person 1 / No Gambling	Selection from comScore top ranking sites in the 18-24 year old demographic group, vetted to exclude any gambling sites.	How does a gambling element impact on how much advertising these avatars are exposed to?
Young Person 2 / Gambler	Selection from comScore top ranking sites in the 18-24 year old demographic group; plus regular visits to popular gambling sites regardless of their comScore stats.	
Adult / Child 20:80	Selection from comScore top ranking sites in the 6-12 year old demographic group combined with selection of top ranking sites in the 35+ year old demographic group. The mix had a 20% adult and 80% child ratio. Adult selection avoided any potential overlap with Young Person selection.	Does the extent to which an adult and child share a computer impact on ad exposure?
Adult / Child 50:50	Selection from comScore top ranking sites in the 6-12 year old demographic group combined with selection of top ranking sites in the 35+ year old demographic group. The mix had a 50% adult and 50% child ratio. Adult selection avoided any potential overlap with Young Person selection.	
Adult 1 / With Debt	Selection of comScore top ranking sites in the 35+ year old demographic group; plus regular visits to sites specialising in help with debt problems as well as easy loans/money-lending sites, regardless of their comScore stats.	Are vulnerable groups targeted with gambling advertising? And to what extent are they exposed to gambling adverts?
Adult 2 / Gambling Problem	Desk research and selection of comScore top ranking sites in the 35+ year old demographic group; plus regular visits to sites specialising in help with gambling addiction, regardless of their comScore stats. Problem Gambling help pages of gambling websites were not included - so as to avoid overlaps with Young Man 2/Gambler profile.	
Gamer	Selection of online gaming sites.	Does a gaming element impact on the extent to which this avatar is shown gambling advertising?
UK Neutral	This avatar is blank i.e. it has no browsing habits or personality.	This avatar was used as a control to compare to the outcomes of each of the personalised avatars.

Each avatar looked at the same 150 sites. The purpose of this was to identify whether the avatar personality had an impact on which adverts they were being shown across all sites. However, this means that their search behaviour was not necessarily representative of their 'personality', i.e. it is unlikely that a child under 13 would visit gambling help sites. Furthermore, it is also unlikely that an individual would conduct such an intense amount of online browsing activity of visiting 150 sites everyday.

9.4 Strand 4 – Social media analysis

Led by: Demos (Twitter analysis), Ipsos MORI (Facebook analysis)

Objective: To provide an assessment of the volume and frequency of gambling-related advertising and marketing on social media: namely Twitter and Facebook. This includes bespoke age-based analysis to assess the extent to which children and young people are part of this online conversation.

Dates: Data was gathered from Twitter between 1 March and 1 November 2018, and from Facebook between 1 March – 30 September 2018.

Data sources: Twitter data was collected from Twitter's public APIs, using Method52, a piece of software developed by CASM in partnership with Sussex University to enable the collection and analysis of large, online datasets. Method52 was used to collect all Tweets sent from 417 accounts related to gambling during this period, as well as Tweets mentioning these accounts, and details on the profiles of followers of these accounts.

In partnership with social media aggregating platform Synthesio, Ipsos MORI obtained data from the posts of 7 gambling operators shared across their public-facing Facebook pages. For the purpose of easily identifying advertising or marketing materials relating to gambling, the search query collected all content posted directly by the operators. It does not include organic social media content which might mention the operators but was authored by members of the public. Analysis of this data should therefore be seen as indicative, rather than as representative of gambling advertising on Facebook and Twitter.

Search terms: Tweets were classified by relevance to gambling, whether they mentioned a specific bet, and for mentions of free or matched bets. Accounts of users responding to or following gambling accounts were also classified by likely age and country-level location. Tweets were also annotated on whether they contained a warning message. The process of classification is set out in Figures 9.1 and 9.2 below.

Figure 9.1: Classification pipeline for Tweets sent by 'traditional' accounts

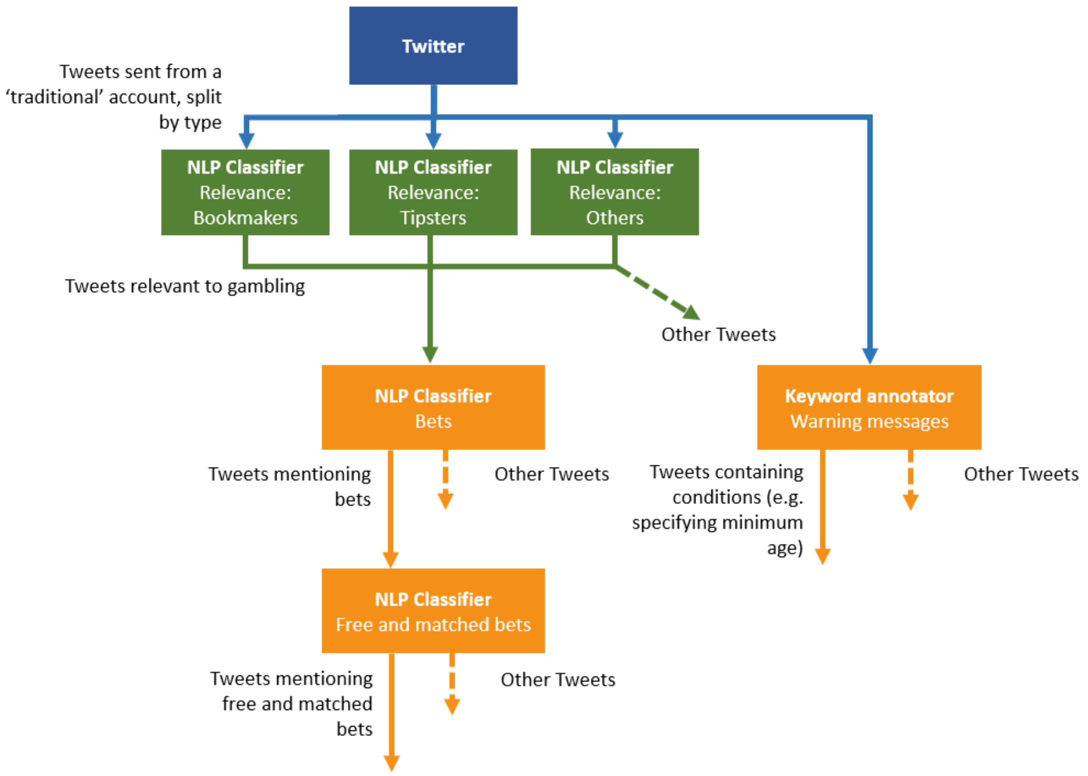
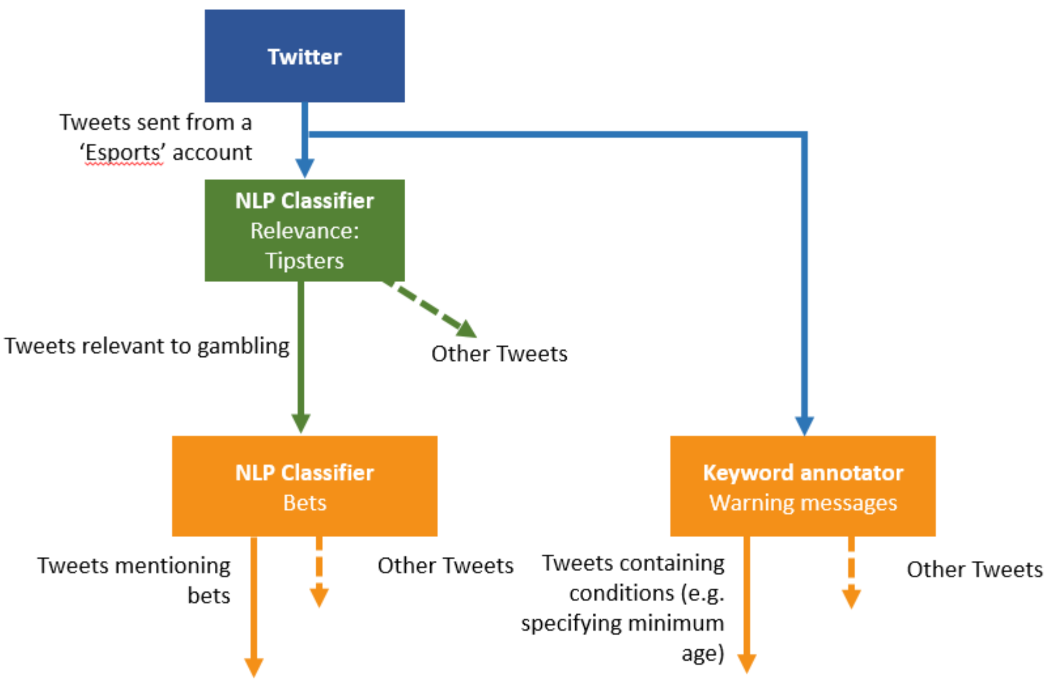


Figure 9.2: Classification pipeline for Tweets sent by 'eSports' accounts



Volume of data included: Centre for Analysis of Social Media collected and analysed 888,745 Tweets sent from 417 gambling related accounts over a 9-month period in 2018.

Data analysis: Natural language processing classifiers are trained by analysts on a given dataset to recognise the linguistic difference between different kinds of data, in this case between Tweets. This training is conducted using a technology called 'Method52', developed by Centre for Analysis of Social Media and Sussex University to allow non-technical analysts to train and use classifiers.

Classifiers were built to analyse two kinds of data, (a) the content of the Tweet itself, and (b) details on the profiles of Twitter users. Both pieces of information are contained in every Tweet returned by Twitter's API. In this paper, the profile names and descriptions of Twitter users were used to categorise them into bookmakers, tipsters, etc. and the text content of the tweets themselves used to determine their relevance to gambling and types of betting in particular. Each classifier was built and trained using Method52's web-based user interface and then the performance tested.

A key aim of this project was to examine how gambling advertising was being consumed and interacted with by social media users of various age groups. In order to study this, Demos worked with researchers at Sussex University's Text Analytics Group to build a classifier designed to estimate a Twitter user's age using attributes within a user's profile. This classifier assigns users to three age bands: "0-15", "16-23", and "24+". The process of building the classifier is detailed below.

Age classifier:

A key aim of this project was to examine how gambling advertising was being consumed and interacted with by social media users of various age groups. In order to study this, Demos worked with researchers at Sussex University's Text Analytics Group to build a classifier designed to estimate a Twitter user's age using attributes within a user's profile. This classifier assigns users to three age bands: "0-15", "16-23", and "24+". The process of building the classifier is detailed below.

Attributes Used for Estimation

The age-prediction model utilises features extracted from nine attributes available in the data of each Tweet. These attributes are described in Table 9.3 below.

Table 9.3: Tweet and user attributes used for age estimation.

Attribute	Data Type	Description (with illustrative examples)
Screen name	free-text	Unique account name; e.g. *@joeblogs92*
User's description field	free-text	Short user biography; e.g. *"Mother to 2 girls"*
User's name	free-text	User desired name; e.g. *"Mr Joe Blogs"*, *"Joeyyyy B"*
Tweet text	free-text	Textual content of the posted tweet
Tweet source	text	Platform that the tweet was posted from; e.g. *"Twitter for iPhone"*
Tweet count	numeric	Total number of tweets and retweets the user has posted
Follower count	numeric	Number of accounts the user being followed by
Friend count	numeric	Number of accounts the user is following

Geo-enabled account	boolean	Whether the user has enabled Twitter to utilise location information from their device; e.g. *"True", "False"*

Classifier Overview

A Multi-View Neural Network model (MVNN) is employed for classification. Such models have the capacity to extract and combine signals (features) from multiple data types, while simultaneously learning how to map extracted signals to a probability distribution over classes (here, the age categories "0-15", "16-23", "24+"). In other words, the attributes of a user are fed into the model, and a confidence of that user belonging to each age category is returned. To obtain the final classification for each user, the age category corresponding to the highest confidence is selected.

The age classifier employed in this study achieved an overall classifier accuracy of 67.2%, an 11.8% increase over the majority-class baseline accuracy of 55.4% (obtained by classifying all instances as "16-23", the most populous age category). The classifier's accuracy for "0-15" estimation can be computed by treating "16-23" and "24+" as a single class: "16+". In this setting, the classifier achieves an accuracy of 77.5%, compared to a majority-class ("16+") baseline accuracy of 70.6%. A full description of the classifier's training will be published in a forthcoming methodological report.

9.5 Strand 5 – content analysis

Led by: University of Stirling and University of Bristol. The University of Stirling carried out a full media deep dive of paid-for gambling advertising in traditional media and the University of Bristol a Twitter deep dive content analysis.

Objective: To provide an in-depth analysis of the tone, format and content of gambling-related advertising across both paid-for advertising and social media marketing, including an exploring to what extent (if at all) content may appeal to children, young people and vulnerable groups.

Dates: For the traditional media content analysis a random sample of 300 creatives were selected from 5-11 March 2018 and 12-18 March 2018. These dates were chosen to reflect a week of high intensity (based on advertising expenditure data) and an adjacent week of average intensity. 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). The sample for the Twitter deep dive came from the Twitter social media analysis which was gathered between 1 March and 1 November 2018.

Data sources: The data for the traditional media content analysis came from Ebiquity's media monitoring data: 45 brands were represented in the sample and there was a stratified sample of: 224 x print press; 27 x internet; 22 x TV; 11 x radio; and 16 x email, direct mail, door drops, outdoor.

For the Twitter deep dive the data from this was solely from Twitter and made up of four samples:

1. 241 from 227,115 Tweets from the accounts run by traditional bookmakers (or their affiliates) (e.g. @Paddy Power) and 258,650 from tipsters (e.g. @footy_tipster) immediately relevant to gambling and gambling advertising.

2. 181 from 26,573 Tweets immediately relevant to gambling and gambling advertising from accounts run by organisations and individuals involved in eSports gambling (e.g. @X-Bet).

3. 191 from 153,274 Tweets produced by traditional bookmakers or their affiliates (e.g. @Paddy Power) and 129,873 Tweets from tipsters (e.g. @footy_tipster) that we classified as content marketing i.e. designed to engender brand loyalty, engagement and sharing.

4. 190 from 21,370 Tweets produced by organisations and individuals involved in eSports gambling (e.g. @X-Bet) that we classified as content marketing i.e. designed to engender brand loyalty, engagement and sharing.

Codebooks: A quantitative codebook was developed and tested by the University of Stirling 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 in the traditional media content analysis. The design and content features were also examined qualitatively to provide illustrative insight into each codebook item.

For the advertising content from the Twitter deep dive a slightly amended version of the codebook was used. This allowed for some comparability between advertising found on these channels and that located on Twitter. For the content marketing a separate codebook was developed as this is a social media tool not necessarily directly relevant to the other media.

Piloting and inter-rater reliability: To establish inter-rater reliability, for both content analysis's two coders independently coded a small sample of creatives and Tweets. 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.[120] Average agreement across items was 99% in the traditional media content analysis (range: 88-100%) and all items had substantial agreement using the Kappa test of reliability (0.75 – 1.00).[121] For the Twitter deep dive analysis the inter-coder agreement was 94% (range 85-100%).

For the exploratory content marketing coding within the Twitter dataset, a different approach was utilised. The coding of emotions presented distinct challenges since the perception of emotions tends to be highly subjective. The coders used a more interpretivist approach employing emotion coding. This goes back to the 1990s and is increasingly used in communication research.[122] The established codebook was discussed and piloted in several sessions by the two coders, before the coding process was started.

9.6 Strand 6 – Sports sponsorship

Led by: University of Stirling

Objective: To examine the frequency and nature of gambling references during television and radio broadcasts of sport in the UK.

Dates and data sources: Table 9.4 below sets out the dates the broadcasts were captured as well the channel they came from. All the selected broadcasts were recorded in their entirety as they were broadcast. 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).

Volume of data included: 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 9.4). The sample also included one radio broadcast on a commercial sports radio station (TalkSport).

Coding: 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. All gambling marketing references were captured using a codebook, and all 10 broadcasts were systematically coded by two coders.

Piloting and inter-rater reliability: When piloting the codebook, to test for inter-rater reliability there was high agreement for broadcast segment (100%), reference type (100%), reference location (94%), reference format (97%), content of the

[120] Stremler ST, J. Best practices in estimating inter-rater reliability. In J. Osbourne (Ed), Best practices in quantitative methods (pp. 29-49). Thousand Oaks, CA: Sage Publications. 2008.
[121] McHugh ML. Interrater reliability: The kappa statistic. Biochemia Medica, 22(3), 276-282. 2012.
[122] Manning, J., & Kunkel, A. D. (2013). Researching interpersonal relationships: qualitative methods, studies, and analysis. Thousand Oaks: Sage Publications.

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.

Table 9.4: The sample of television and radio broadcasts captured in 2018, by sport

Sport	Competition	Fixture	Date	Broadcast channel
Football	English Premier League	West Ham United vs. Manchester United	29th September 2018	BT Sport
Football	English Premier League	Bournemouth vs. Crystal Palace	1st October 2018	Sky Sports
Football	English Premier League	Crystal Palace vs. Tottenham Hotspur	10th November 2018	Talk Sport[123]
Football	Ladbrokes Scottish Premiership	Rangers vs. Celtic	11th March 2018	Sky Sport
Football	UEFA Champions League	Tottenham Hotspur vs. Barcelona	3rd October 2018	BT Sport
Football	International Friendly	England vs. Italy	27th March 2018	ITV 1
Tennis	French Open	Rafael Nadal vs. Dominic Thiem	10th June 2018	ITV 1
Rugby	RBS Six Nations	Scotland vs. England	24th February 2018	BBC One
Formula One	F1 World Championship	British Grand Prix	8th July 2018	Channel 4
Boxing	World Cruiserweight Title fight	Tony Bellew vs. Oleksandr Usyk	11th November 2018	Sky Sports

[123] This broadcast was from the radio, all others were from television.

9.7 Strand 7 – Quantitative survey with children and young people

Led by: ScotCen

Objective: The quantitative survey aimed to explore the extent to which children, young people and young adults (aged 11-24 years) are exposed to gambling advertising and the impact of gambling marketing on young people's attitudes towards gambling and gambling behaviour.

Dates: The postal-online-telephone survey was conducted between 21 May 2019 to 13 September 2019.

Ethics: ScotCen received ethical approval for the survey from the NatCen Research & Ethics Committee in April 2018.

Recruitment: ScotCen entered into data sharing agreements with the Scottish Government and the Department of Work and Pensions in order to receive contact details for individuals who had taken part in the Scottish Household Survey (SHS 2014-16) or Family Resources Survey (FRS 2017). These individuals had also given their consent to be contacted about further research and had at least one person aged 11 to 24 living in the household. ScotCen contacted 6,125 households by post and email, where an email address had been provided. Five weeks following the initial mailing, non-responding households which had provided a telephone number were contacted by telephone and invited to complete the survey over the phone. All those aged between 11 and 24 living in each household were invited to take part in the survey.

Survey process: The questionnaire was developed using both questions included in other relevant surveys on gambling and the impact of alcohol marketing, as well as specifically tailored questions. All respondents were sent a £5 high street voucher on receipt of a completed survey.

Participants: ScotCen received 1,091 completed surveys from 912 households. When adjusting for the likely proportion of households with out of date contact details and the proportion of households with no eligible participants, the approximate household response rate is 33%. As the sample was drawn from two nationally representative surveys, it was possible to weight the respondents to be representative of those aged 11-24 in Britain.

Demographic breakdown: The demographic characteristics of the survey participants are summarised in Table 9.5.

Table 9.5: Demographic breakdown of survey participants

Variable	%	n
Age		
11-17	63	676
18-24	37	394
Not reported	-	21
Gender		
Male	46	485
Female	54	560
Not reported	-	46
Ethnicity		
White British	86	906
All other ethnicities	14	152
Not reported	-	33
Country		
England	47	506
Scotland	50	538
Wales	3	34
Other	[a]	2
Not reported	-	11

IMD Quintile		
1 (most deprived)	12	128
2	17	186
3	22	245
4	22	245
5 (least deprived)	26	285
Not available	-	2

Description of derived variables:

Demographic variables

- Age: Respondents were split into two age groups: 11-17 and 18-24. Respondents who gave an age outside the 11-24 age bracket were removed from the dataset.
- Gender: Only respondents who responded "male" or "female" are included in the derived age variable. Individuals who preferred to self-describe and individuals who selected "prefer not to say" are omitted from this variable.
- IMD: Deprivation quintile was derived based on postcode of the original address provided in the SHS or FRS sample file. Scottish, English and Welsh Index of Multiple Deprivation were used to give a deprivation quintile for each household.

Gambling activity variables

- Current gambler: Respondents were asked how often they took part in gambling activities. Those who reported that they never usually took part in any gambling activities were classified as 'not current gamblers'. All other responses (ranging from once a month or less to every day) were considered to be current gamblers. Respondents did not have to have spent their own money on gambling activities to be classified as current gamblers.
- Ever gambler: Respondents were asked what age they were when they had first spent their own money on gambling. Those who responded that they had never spent their own money on gambling were classed as "never gamblers". Respondents who had spent their own money on gambling at any age were classed as "ever gamblers".
- Susceptibility to gambling: All respondents were asked whether they thought that they would spend money on gambling in the next year. Those who were not current gamblers were categorised as susceptible to gambling within the next year if they selected the answer (definitely yes, probably yes and probably not), and not susceptible if they opted for 'definitely not'. This approach to classifying susceptibility has also been used in relation to youth susceptibility to consume alcohol.[124]
- Risk of problem gambling: Problem gambling among adolescents is commonly measured using the DSM-IV-MR-J 10-item scale. Two items from the DSM-IV-MR-J relating to preoccupation and loss of control were used in this survey to give an indication of the risk of problem gambling among current gamblers. The purpose of this was to identify a potential sub-group within the sample of those at higher risk of problem gambling to be used in the analysis, and not to provide a reliable estimate of problem gambling within the population. Table 9.6 shows the questions used and the way in which responses were classified to give an indication of being at risk of problem gambling among current gamblers.

[124] Examples of this approach being used in other similar studies are as follows: Pierce et al, 1996 (https://psycnet.apa.org/record/1996-06101-004), Mutti et al, 2017 (https://academic.oup.com/heapro/article/32/4/650/2950997) and Critchlow et al, 2019 (https://eucam.info/2019/02/20/nathan-critchlow-et-al-2019-participation-with-alcohol-marketing-and-user-created-promotion-on-social-media-and-the-association-with-higher-risk-alcohol-consumption-and-brand-identification-among/)

Table 9.6: Classification of risk of problem gambling

Risk of problem gambling	In the past year, how often have you found yourself thinking about or planning to gamble?	In the past year, have you spent much more that you planned to on gambling?
High risk	Often	Often
Low risk	Often	Sometimes
Low risk	Sometimes	Often
Low risk	Sometimes	Sometimes
No risk	Once or twice/ Never	Once or twice/Never

Gambling marketing variables

- Exposure to gambling marketing: Respondents were asked to select all the ways in which they had seen or heard gambling being advertised in the last month from a list of 19 items including “None of the above”. Respondents who did not select any of the items were omitted from analysis. The total number of types of gambling advertising seen or heard by each person was calculated to give the level of exposure to gambling marketing. Exposure is either given as the mean number of items of gambling advertising seen, or as categories based on the tertile splits of responses: Low (0-5), Average (6-8), High (9-17).

- Engagement with gambling marketing: Respondents were asked to select all the ways with which they had engaged with gambling marketing from a list of 9 items including “None of the above”. Respondents who did not select any of the items were omitted from analysis. The total number of types of gambling advertising engaged with was calculated to give a count of the number of types of gambling advertising with which the respondent had engaged. Gambling advertising engagement is either given as mean number of types of gambling advertising engaged with or as categories: None, One, Two or more. Given the very low numbers of respondents engaging with gambling marketing and the large proportion of respondents selecting “None of the above”, these categories are not based on tertile splits.

- Attitudes towards advertising and gambling advertising: Respondents were asked about their views on advertising in general and gambling advertising specifically using a 5-point scale ranging from “I like adverts a lot” to “I dislike adverts a lot”. In each case, the two positive categories (I like adverts a lot/a little) were combined to give overall positive views of advertising/gambling advertising, and the neutral category (I neither like nor dislike adverts) and negative categories (I dislike adverts a lot/a little) were combined to give overall neutral and negative views of advertising.

- Gambling Outcomes Expectancies Scale (GOES): The questionnaire included an adapted version of the Gambling Outcome Expectancies Scale to explore respondents’ perceptions of the outcomes of gambling behaviour (Flack and Morris, 2015; Flack and Morris, 2016). GOES was designed to assess interrelated gambling motivations including gambling for excitement, escape, ego enhancement, socialisation, and money, and measures beliefs about the perceived outcomes of gambling, independent of gambling frequency.

  The adapted GOES comprises 18 agreement statements which are split into five subscales (Table 9.7). The scale was adapted to use a 5 item Likert scale from strongly agree to strongly disagree with a neutral mid-point. Respondents were asked to rate their agreement with each statement and responses were scored (strongly agree=5, strongly disagree=1). An average score was calculated for each subscale, with any response above 3 meaning that the young people were more likely to agree with the statement.

Table 9.7: Gambling Outcome Expectancies Scale (GOES) agreement statements and subscales

Subscale	Statement
Excitement items	Gambling is a rush
	Gambling is about enjoying intensive feelings
	Gambling gives a feeling of really being alive
Escape	Gambling is a way to forget everyday problems
	Gambling is the best way to relax
	Gambling can help clear your mind
	Gambling helps release tension
Ego enhancement	Gambling is about feeling like an expert
	Gambling produces a feeling of importance
	Gambling is about feeling in control
	Gambling produces a feeling of being powerful
Money	Gambling is a way to win big money immediately
	Gambling provides a good chance to win big with small money
	Gambling is a way to make big money
Sociability	Gambling provides an opportunity to be with similar people
	Gambling is a way to meet new people
	Gambling provides an opportunity to get along with other people favourably
	Gambling provides an opportunity to be with friends

Friends' and family's views of gambling

- Peer and carer gambling status: Respondents were asked how often their female carer, male carer and closest friend took part in gambling activities. Where it was reported that these people never took part in any gambling activities they were classified as “not current gamblers”. For all other responses (ranging from once a month or less to every day), these people were considered to be current gamblers.

- Perceived carer gambling acceptability: Respondents were also asked if thought their female carer and male carer would find it to be acceptable if the respondent spent money on gambling. In each case, the two answer options relating to gambling being considered acceptable (totally acceptable/somewhat acceptable) were combined to give an overall acceptable category, and the neutral (neither acceptable nor unacceptable) and two negative answer option (totally unacceptable/somewhat unacceptable) were combined to give an overall not acceptable and neutral category.

9.8 Strand 8 and 9 – Qualitative research with children, young people and vulnerable adults

Led by: Ipsos MORI, ScotCen

Objective: To provide a more nuanced understanding of exposure to gambling-related advertising in the context of other attitudes, behaviours and circumstances – including frequency of exposure, which tone/format is most engaging, and the potential impact (both immediate and over time). ScotCen carried out focus groups (along with 4 in-depth interviews with problem gamblers) and Ipsos MORI carried out in-depth interviews.

Dates: The fieldwork for the in-depth interviews was carried out by Ipsos MORI in July-September 2018. The fieldwork for the ScotCen focus groups and interviews was between November 2018 and February 2019.

Ethics: Ipsos MORI received ethical approval from the University of Edinburgh's Research & Ethics Committee in June 2018, and ScotCen from the NatCen Research & Ethics Committee in April 2018.

ScotCen recruitment: To recruit participants to take part in focus groups and interviews, ScotCen enlisted the help of organisations who worked with: young people aged 11-24; adults with an experience of problem gambling; and adults who had experienced mental health problems. Ten focus groups with children and young people aged 11-24 and 3 focus groups and 4 interviews with vulnerable adults were completed.

Participants: Ipsos MORI interviews were initially carried out with 28 children and young people (CYP) aged 11-24 and 32 vulnerable adults. Of these, 20 children and 25 vulnerable adults went on to complete a follow-up interview.

The vulnerable adults were divided into three main groups (each of which had two sub groups within). The vulnerable adults identified for inclusion in the research were based on priority groups identified in discussion with GambleAware and the Gambling Commission as shown in Table 9.8 below. A further demographic breakdown of all participants is included in Tables 9.9 and 9.10.

Table 9.8: Vulnerable group definitions

Group 1: People living in constrained economic circumstances	Group 2: People with limited capacity to understand information	Group 3: People already experiencing gambling problems
Routinely struggle with money / availability of disposable income / low income	First language is English and have difficulties with comprehension	Moderate risk gamblers
People whose economic circumstances have recently changed	First language not English and cannot speak English well	High risk gamblers

Table 9.9: Demographic breakdown of children and young people

Children and young people	Number
11-14	7
15-17	7
18-21	7
22-24	7
Male	11

Female	17
AB	7
C1	7
C2	7
DE	7
BME	8
High awareness (recognises 3 gambling companies)	13
Medium awareness (recognises 1-2 gambling companies)	9
Low awareness (recognises no gambling companies)	5
Has gambled before	4

Table 9.10: Demographic breakdown of adults

Adults	Number
18-34	6
35-44	8
45-54	11
55-64	3
65+	4
Male	18
Female	14
AB	2
C1	14
C2	5
DE	11
BME	7
First language is English and have difficulties with comprehension	6
First language not English and cannot speak English well	5
Moderate risk gamblers	5
High risk gamblers	7
Routinely struggle with money / availability of disposable income / low income	16
People whose circumstances have recently changed	15

In total, 83 people participated in a focus group or interview with ScotCen; 47 were female and 36 were male. Sixty-two of the participants were young people aged 11-15 years (n=20), 16-19 years (n=31), or 20-24 years (n=11); 38 were female and 24 male. Thirteen adults with an experience of mental health problems (9 female, 4 male) and 8 adults with problems with gambling (all male) took part in a focus group or interview.

Ipsos MORI interview process: Participants took part in three stages of research:

1. First, participants took part in a 90 minute in-depth face-to-face interview to talk about their thoughts on gambling advertising, and advertising more generally and to introduce stage 2 of the research. This stage also included a pre-interview questionnaire to gather some further contextual information about each participant.

2. Following the interview, participants completed a four-week long research task. This involved keeping a diary of adverts that participants noticed during that time using a mobile app. For the first two weeks, participants were asked to take pictures of any advertising (gambling or non-gambling) that caught their attention. For the final two weeks, they took pictures only of gambling advertising they came across. Each time a participant sent in a picture using the app, they were asked some follow up questions about the advert they had uploaded.
3. A 45 minute telephone interview at the end of the 4 week task to explore, in more depth, some of the adverts they had seen during the task.

Fieldwork took place in five areas across the UK in a mixture of urban and rural locations:

- London
- North Wales
- Lancaster
- Birmingham
- Glasgow.

Steven Ginnis
Research Director
steven.ginnis@ipsos.com

Holly Kitson
Senior Research Executive
holly.kitson@ipsos.com

For more information

3 Thomas More Square
London
E1W 1YW

t: +44 (0)20 3059 5000

www.ipsos-mori.com
http://twitter.com/IpsosMORI

About Ipsos MORI's Social Research Institute

The Social Research Institute works closely with national governments, local public services and the not-for-profit sector. Its c.200 research staff focus on public service and policy issues. Each has expertise in a particular part of the public sector, ensuring we have a detailed understanding of specific sectors and policy challenges. This, combined with our methods and communications expertise, helps ensure that our research makes a difference for decision makers and communities.