

Project 4.1: The effect of marketing and advertising on children, young people and vulnerable people

Introduction

1. An increase in the volume of gambling marketing and advertising, combined with advances in technology offering new opportunities for promotion, has exacerbated concerns about the effect of marketing and advertising, particularly on children, young people and vulnerable people.
2. This brief sets out the requirements for new research into the content and tone of gambling marketing and advertising and its effect on behaviour and perceptions of gambling, and an overview of potential approaches that the Responsible Gambling Strategy Board (RGSB) would like to see taken.
3. This work is identified as a high priority project in the [RGSB Research Programme 2017-2019](#) and falls under the following priority action area in the [National Responsible Gambling Strategy](#).

Research governance

4. In September 2016, the RGSB and GambleAware published a Research Commissioning and Governance Procedure which describes how research priorities are set and how research programmes are commissioned under the tripartite agreement between the Board, GambleAware and the Gambling Commission¹. The purpose of the Procedure is to give transparency about the arrangements and to provide assurance that research priorities are set independently and are delivered with integrity.
5. The Research Procedure makes clear that the RGSB, not GambleAware, is responsible for producing the briefs that set out the questions and context for the research that is then commissioned by GambleAware.

Background and policy context

6. The Gambling Act 2005 permits all forms of advertising providing it is socially responsible and that there are adequate protections to prevent such advertisements from appealing directly to children and young people.
7. The UK Code of Non-Broadcast Advertising, Sales Promotion and Direct Marketing (CAP code) and the UK Code of Broadcast Advertising (BCAP code) cover the content and placement of advertising. The rules aim to ensure that that gambling

¹ [Research Commissioning and Governance Procedure](#), Responsible Gambling Strategy Board, September 2016

advertising is socially responsible, is not aimed at children or young people and that it does not leave vulnerable people open to exploitation and harm. The Codes are enforced by the ASA.

8. In April 2014 the UK Government announced the scope of a four strand review of the rules governing gambling advertising. The aim of this review was to ensure that these rules keep pace with technological developments, provide the necessary protections to young and vulnerable people, and are consistent with public expectations of gambling advertising. The strands involved:
 - The Remote Gambling Association (RGA)² reviewing and recommending changes to the Industry Voluntary Code for Socially Responsible Advertising
 - The Committees of Advertising Practice (CAP and BCAP) evaluating the latest evidence in relation to gambling advertising and considering if changes to the rules are required
 - The ASA reporting on the proportionality, robustness and consistency of its enforcement action on the gambling rules
 - The Gambling Commission reviewing the Licence Conditions and Codes of Practice (with a focus on free bets and bonuses) to ensure that all gambling advertising continues to comply with the licensing objectives of the Gambling Act 2005.
9. The review found that the evidence did not provide a significant case for changes to the rules. However, the Minister said: “I will continue to look at the issue of gambling advertising regularly and will not hesitate to take further action if necessary to protect people from being harmed by gambling.”
10. Following the review the Industry Group for Responsible Gambling (IGRG) announced that the gambling industry would no longer advertise sign-up offers on television before 9pm.
11. On 24 October 2016 the Department for Culture, Media and Sport (DCMS) published a call for evidence ([“Review of Gaming Machines and Social Responsibility Measures”](#)), which featured gambling advertising. It posed the question, “Is there any evidence on whether existing rules on gambling advertising are appropriate to protect children and vulnerable people from the possible harmful impact of gambling advertising?”
12. However, it has been acknowledged that there has been lack of new evidence to support action in this area since 2014, despite an increase in emerging forms of gambling marketing and advertising and ongoing concerns about the relationship between advertising and gambling-related harm. For this reason this project was identified as a high priority research project in the RGSB Research Programme.

² It was subsequently agreed that the Industry Group for Responsible Gambling (IGRG) would coordinate this review, with the support of the RGA.

Related research

13. In 2014, GambleAware (then called the Responsible Gambling Trust) published Per Binde's [critical review of research on gambling advertising](#), with particular attention paid to studies concerning the impact of advertising on gambling participation and the prevalence of problem gambling. This report was intended to help organisations and researchers by providing a source of guidance when forming research priorities and planning studies into gambling advertising.
14. Binde identified five high priority areas for future research, advising that methods and approaches could be combined in new and innovative ways:
 - **Surveying the volume and forms of advertising**
"Recurrent measurements give valuable insight into trends in the gambling market and provide basic facts about the extent and forms of advertising as well as people's exposure to it, giving perspective to discussions and research findings on its impact on problem gambling. As a previous review of the field concluded, hard facts are needed, as much of the discussions on gambling advertising are opinion-driven."
 - **Content analysis**
"Studies including quantification add the benefit of showing how common various messages are; if combined with media tracking, the frequency of messages, the media channels used and the target audiences will become known."
 - **Self-rated impact of gambling advertising**
"It is advisable to explore the self-rated impact of gambling advertising in research on perceptions of and attitudes towards advertising. Valuable insights can be gained into what kinds of advertising, if any, may have a negative impact on vulnerable groups, such as youth, "at risk" gamblers and people who already have a gambling problem. In qualitative studies, problem gamblers can tell whether, and how, various kinds of advertising have made their situation worse."
 - **Self-report studies of perception of advertising**
"Studies of perception of and attitudes towards gambling advertising have the potential to provide valuable insights into how advertising messages of various kinds are perceived and understood by different groups of people. Their usefulness increases if combined with exploration of the self-rated impact of gambling advertising, subjectively misleading advertising, and especially when considering risk factors for problem gambling."
 - **Advertising codes and risk factors for problem gambling**
"It is a high priority to perform systematic and comprehensive reviews of how risk factors for problem gambling relate to themes and messages in gambling advertising. These reviews should preferably consider the varying motivations for gambling across different forms of gambling, and for different types of gamblers, and how these motivations may turn into forces that drive excessive involvement."

15. As well as providing a number of prioritised recommendations for future research, the report also provided a list of principles to be considered when studying gambling advertising, including:

- Acknowledge that high consumption of gambling is not the same as problem gambling; any study of advertising impact on the individual level needs to make this distinction
- If exploring the impact of advertising on problem gambling, a clear definition of problem gambling should be used and there should be an explicit hypothesis about how advertising impact may relate to problem gambling according to that definition
- Being inspired by the large body of theories and research in advertising and cultural studies concerning persuasion and messages in advertising
- In the future covering new modes of promotion, such as via social networks on the internet and “social gaming”.

16. This brief seeks to ensure, amongst other things, that Per Binde’s recommendations are incorporated into the research project and that research takes place which provides new evidence and addresses the current and emerging gaps in our knowledge and understanding of gambling advertising.

17. Other research that could be drawn upon to inform this work includes:

- [Young People and Gambling 2016: A research study among 11-15 year olds in England and Wales](#) (Gambling Commission, 2016)
- [Gambling participation in 2016: behaviour, awareness and attitudes](#) (Gambling Commission, 2017)
- [Gambling Risk Factors Exercise: A Regulatory Statement on CAP and BCAP’s call for evidence into risk factors associated with advertising that could lead to gambling-related harms](#) (CAP, 2015)
- [Gambling and Social Media](#) (Demos, 2016)
- Factor that influence children’s gambling attitudes and consumption intentions: lessons for gambling harm prevention research, policies and advocacy strategies (Pitt et al, 2017)
- Do advertising and promotions for online gambling increase gambling consumption? An exploratory study (Hing, Cherney, Blaszczyński, Gainsbury & Lubman, 2014)
- The use of social media in gambling (Gainsbury et al, 2014)
- Exposure to and engagement with gambling marketing in social media: Reported impacts on moderate-risk and problem gamblers (Gainsbury et al, 2016).

Scope

18. Marketing and advertising

Whilst broadcast media is of particular interest to the current government review, it is vital that this project covers all forms of marketing and advertising including, but not

limited to, online advertising, promotion via social media channels, affiliate marketing, sports sponsorship, celebrity endorsements and promotions via text message.

19. Children and young people

A key focus of this work will be to explore the influence of gambling marketing and advertising on children and young people between 11 and 18 years of age.

20. Young adults

It is also important that young adults (those aged between 18 and 24 years of age), who have recently become permitted to gamble and who are a key target market for gambling operators are also included in the scope of this work.

21. Vulnerable people

A core objective of this work will be to identify specific themes and features of gambling advertising that children, young people and vulnerable groups are particularly susceptible to. It is important to be clear that anyone can be vulnerable to gambling-related harm, however research suggests that there are some groups which are likely to be more vulnerable to negative effects of gambling marketing and advertising. We suggest therefore that as well as children and young people this research takes into account, as a minimum:

- Those living within economic constraints
- Those living with a limited capacity to understand information contained within gambling marketing and advertising
- Those already experiencing problems with their gambling.

Research objectives

22. The overall objectives for this project are to:

- Explore whether gambling marketing and advertising influences children and young people's, attitudes towards gambling, in what ways and the impact of this
- 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
- Identify specific themes and features of gambling advertising that children, young people and vulnerable groups are particularly susceptible to.

Research questions

23. To meet these objectives, we have identified a number of research areas we would like to be addressed. These are:

Format and content:

- Focusing on marketing and advertising across all media, where and how often does gambling advertising occur?

- What are the main themes and features used to market and advertise gambling products?
- What are the specific themes or features of gambling marketing and advertising which children, young people and vulnerable groups are particularly susceptible to?

Advertising impacts:

- 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?
- How does the impact of gambling advertising or marketing vary by different mediums?
- 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:

- 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?
- 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 gambling³?

24. In order to best answer these research questions and incorporate Per Binde's guidance we envisage that this project is a mixed-mode piece conducted by a multi-disciplinary team or consortium of bidders.

³ The aim of this research question is to improve understanding of the impact of the immediacy of online advertising compared to advertising on other media and if possible provide a rate to be used in regulatory and policy contexts.