Ipsos MORI

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Interim Synthesis Report

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

Written by Ipsos MORI on behalf of GambleAware

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

1 Executive Summary 1
1.1 Background and method 1
1.2 Exposure to gambling advertising and marketing 3
1.3 Themes and features 5
1.4 Recommendations 7
2 Introduction 9
2.1 Project overview 9
2.2 Research design 10
2.3 Notes on interpretation 13
2.4 Acknowledgments 14
3 The evidence to date 15
3.1 Key findings 15
3.2 Existing evidence on exposure 15
3.3 Themes and features 18
3.4 Key gaps that emerged 20
4 Evidence of volume and likely exposure 21
4.1 Key findings 21
4.2 Overall evidence on volume 22
4.3 Evidence of volume across channels 25
4.4 Likelihood of exposure for children, young people and vulnerable groups 34
5 Experience of children, young people and vulnerable adults 39
5.1 Key findings 39
5.2 Gambling advertising in context 39
5.3 Reported exposure to gambling advertising and marketing 41
5.4 Themes and features that attract attention 45
6 Analysis of advert content, tone, and format 47
6.1 Key findings 47
6.2 Evidence of some appeal to children and vulnerable adults 49
6.3 Evidence of wider concerns in relation to susceptibility of children, young people and vulnerable adults 54
7 Conclusions and recommendations 59
7.1 Conclusions from interim synthesis analysis 59
7.2 Recommendations from interim synthesis analysis 62
8 Methodology summaries 64

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8.1 Strand 1 – Literature review 64
8.2 Strand 2 – Media monitoring 65
8.3 Strand 3 – Online avatars 67
8.4 Strand 4 – Social media analysis 69
8.5 Strand 5 – Content analysis 72
8.6 Strand 6 – Sports sponsorship 73
8.7 Strand 8 and 9 – Qualitative research with children, young people and vulnerable adults 74

List of figures

Figure 3.1: Country of research origin (Search run April 2018) 16
Figure 3.2: How often would you say you see gambling adverts and gambling sponsorships in the following places? (Data collected February – July 2018) 17
Figure 4.1: Estimated spend by sub-sector (2015-2018) 24
Figure 4.2: TV gambling advertising by time of day (October 2017 – September 2018) 25
Figure 4.3: Estimated overall spend (October 2017 – September 2018) 27
Figure 4.4: Types of gambling adverts shown to avatars (September – October 2018) 28
Figure 4.5: Examples of gambling adverts from the matches analysed (2018) 31
Figure 4.6: Number of gambling ads served by avatar type (September – October 2018) 35
Figure 4.7: Number of advert impressions by website (top 9) (September – October 2018) 37
Figure 5.1: % of gambling adverts captured by participant diary over two-week period 42
Figure 6.1: Examples of adverts judged as plausibly having appeal directly to children and young people ... 50
Figure 6.2: Example of adverts containing features that may appeal to children and young people as well as wider audiences 52
Figure 6.3: Examples of adverts with financial incentives, to which children, young people and vulnerable adults are particularly susceptible 53
Figure 6.4: Evidence of ads that create a sense of urgency 55
Figure 6.5: Evidence of ads that may plausibly exploit the susceptibilities of children, young people and vulnerable adults 56
Figure 6.6: Examples of poor visibility of consumer protection messages 58
Figure 8.1: Classification pipeline for Tweets sent by 'traditional' accounts 70
Figure 8.2: Classification pipeline for Tweets sent by 'eSports' accounts 70

List of tables

Table 1.1: Research strands 2
Table 2.1: Vulnerable group definitions 12
Table 4.1: Monitored volume and estimated spend of gambling advertising by media type, (2015-2018) 22
Table 4.2: Accounts collected and relevant tweets by type 24
Table 4.3: Gambling companies spending the most money by media type – Top 5 (October 2017 – September 2018) 26
Table 4.4: Number of advert impressions by brand – Top 20 (September – October 2018) 28
Table 4.5: Most Retweeted Tweets sent by gambling-related accounts – Top 10 (March – November 2018) . 30
Table 4.6: Summary of gambling references for boxing, rugby union and tennis (2018) 32
Table 4.7: Summary of gambling references in television and radio football broadcasts (2018) 33
Table 4.8: Top 10 gambling adverts viewed by Child Under 13 and Adult 2 with Gambling Problem by site (%) (September – October 2018) 36
Table 6.1: Codebook section four: Visibility of consumer protection messages 57

Table 6.2: Number and % of Tweets mentioning each type of condition warning messages within the body of text 58
Table 8.1: Portfolio data generation by media type (volume and spend) 65
Table 8.2: Avatar profiles 67
Table 8.3: Tweet and user attributes used for age estimation. 71
Table 8.4: The sample of television and radio broadcasts captured in 2018, by sport 74
Table 8.5: Vulnerable group definitions 75
Table 8.6: Demographic breakdown of children and young people 75
Table 8.7: Demographic breakdown of adults 76

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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 each study). Separate consortium reports have been prepared to give more detail on the work each consortia led and methods used. These separate reports will be published online later in the year.

Ipsos MORI have written this interim synthesis report, which explores exposure, tone and format of gambling related marketing and advertising. It draws on data from all strands minus the survey of children and young people and collection of 'click through data' (strands 7 and 10). The results from these strands will be available in due course and will form part of the final, full synthesis report which will report on the impact of gambling advertising. The key findings, conclusions and recommendations synthesised in this report 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 research 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 objectives were explored through a multidisciplinary approach. In total there were 10 strands to the research; a summary of which is provided below:

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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 and young people	ScotCen Social Research	To provide a nationally representative measure of exposure to and impact of gambling-related advertising among children and young people.
Strand 8 – qualitative research with children and young people Strand 9 – qualitative research with vulnerable people	Ipsos MORI ScotCen Social Research	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).
Strand 10 – analysis of 'click through data'	Ipsos MORI	Collection and aggregation of industry click-through data to ascertain conversion rate and engagement within online gambling-related advertising.

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1.2 Exposure to gambling advertising and marketing

1.2.1 Volume of advertising and marketing

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 of 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.

Although there are signs that this is cooling in some sectors and channels[1] it is also apparent that the adverts captured as part of this study are likely to be an underestimate. 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, 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 by: i) 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 – 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.

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[2]. 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 Exposure of children, young people and vulnerable adults

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 was found on sites such as Oddschecker, sites used by regular gamblers, which are unlikely to be visited by children. Findings from 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. Qualitative research identified TV, social media and the high street as the main sources of self-reported exposure to gambling advertising (the quantification of which will be explored in a forthcoming survey, and will feed into the second synthesis report to be published in due course). 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

[1] 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

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

YouTube or ads appearing while scrolling through Facebook feeds, with a small number 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, 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.

There is clear evidence of children following and engaging with betting 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.[3]

Though exposure to advertising didn't always translate into engagement, there is likely to be wider impact. Many participants claimed to be good at ignoring gambling advertising content (particularly those under 18, who felt it wasn't relevant to them); however, the strong performance of all participant groups in the brand recognition task 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 the task.

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.

Messages of risk and messages to gamble responsibly received mixed levels of understanding. The majority of children and young people felt that in theory, gambling could be enjoyable; however, their understanding of risk varied. They often described risk in overly simplistic terms with some confusion about the chance of winning. Without prompting, there were calls from participants across all groups to better highlight the risks of gambling.

The research identified two possible ways to further 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 make better use of age screening tools before individuals are allowed to follow accounts that promote gambling. Secondly, betting operators and advertisers could make better use of adtech to positively exclude online browsing profiles that present themselves as being very 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.

It is too early to judge the impact of exposure to gambling advertising and marketing on children, young people and vulnerable adults within this Interim Synthesis report. The qualitative research suggested that impact should be considered in broader terms than whether or not someone is prompted to gamble upon seeing an advert. For example, exposure to the sheer volume of gambling advertising and marketing led to some normalisation of gambling and, on occasion, legitimisation among participants. However, these emerging findings need to be assessed alongside findings from the forthcoming survey research to consider the role of other factors in influencing gambling attitudes and behaviours. These more complex relationships between advertising and emotions, as well as beliefs and attitudes towards gambling will be explored further in the Full Synthesis report.

[3] It is important to note that analysis has not been restricted to analysis of licences 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.

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1.3 Themes and features

1.3.1 Identification of themes and features

The content analysis demonstrated the wide variety of themes and features used to market gambling. This included adverts with no specific gambling reference; this was particularly the case on social media where 'content marketing' was widely used to build brand loyalty rather than prompt a specific gamble (for example debating the best players in the league). Within those ads designed to elicit an immediate customer response (i.e. to place a bet), 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). A wide range of topical associations were also used to promote gambling and gambling brands, the most prominent of which was sport; this was often comprised of specific bets linked to real world events, teams or organisations, or broader discussion of topical sporting debates. Other common features included the use of humour (especially within 'content marketing') and celebrity endorsement. It was less common to advertise jackpots and potential prizes, or feature previous winners or testimonials.

The literature review and qualitative research identified a wide range of themes and features of gambling advertising that attracted the attention of children, young people and vulnerable adults. These features were wider than the use of visual images and colours that might traditionally elicit appeal, or reference to specific child friendly terms; they also included reference to the framing of the gamble, such as emphasis on fun or financial offers. In alphabetical order, themes and features that attracted the attention of participants from the qualitative research included:

- **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**: participants in all categories 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 younger children.
- **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 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, 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.

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- '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 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.

'Appeal' among children and young people cannot therefore be simply defined as binary. 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 identified some instances of this kind of appeal, 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 other features that are not unique to them: for example, the use of humour, financial incentives, and the presentation of winners all appealed. Moreover, 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 and young people.

Beyond appeal (i.e. the extent to which an advert attracts attention) 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) difficulty of distinguishing advertising from general content on Twitter, and the extent to which children and young people will be able to identify which content is designed to influence their attitudes and behaviours in favour of gambling; ii) a lack of emphasis on the risks of gambling and of messages of responsible gambling; and iii) the lack of ability in children, young people and vulnerable adults to understand the risks involved in cases with complex terms and conditions or where reduced risk or free bets/spins are promoted.

1.3.2 Prevalence of themes and features

The University of Stirling and University of Bristol led two independent pieces of content analysis to explore the content, tone and format of gambling advertising through traditional media and on Twitter respectively. It should be noted that the analysis does not take account of where the advert was placed, but is a discrete analysis of the contents of the advert itself.

There was some evidence of content or features that could appeal directly to children and young people. Within the content analysis of traditional media conducted by University of Stirling, there were three features that 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.

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Enticing financial offers are a common feature of gambling advertising, and are likely to attract the attention of some children, young people and vulnerable adults. 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 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.

There is 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.

Some ads may exploit the susceptibility of children, young people and vulnerable adults. Given the mixed and often limited understanding of risk identified among participants in the qualitative research, the content analysis pointed to a number of features of gambling advertising that may exploit the susceptibilities, aspirations, credulities, inexperience, or lack of knowledge of children, young people and vulnerable adults. These included implying 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 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.

1.4 Recommendations

Based on the context of these findings, Ipsos MORI has identified 12 recommendations that warrant further consideration among industry, regulators and researchers. Further recommendations relating to impact and exposure will be considered within the Full Synthesis Report.

1.4.1 Recommendations for gambling, advertising and tech industry

1. **Explore making better use of technology to minimise the risk of exposure of gambling advertising content to children, young people and vulnerable adults.** This could include using adtech to positively exclude certain online profiles from seeing gambling ads (including those with 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.

2. **Integrate more explicit and more frequent references to risk and responsible gambling within advertising and consider the visibility of warnings within advertising content.** This signposting could include dedicating more visual presence to messages about responsible gambling within current ads; increasing the clarity of risk where it is likely some groups may misunderstand financial incentives; being cautious not to over-emphasise elements of fun and enjoyment; and ensuring that clear age restrictions are evident where appropriate.

1.4.2 Recommendations for policy and regulation

3. **Establish where issues identified within the research are due to poor compliance with existing regulations and guidelines, or where there may be a need for further guidance from regulators, or new regulations.** Regulatory issues identified for attention include the use of individuals under 25 in gambling adverts, labelling of ads on social media, the prominence of consumer protection messages, and determining whether financial incentives are presented clearly enough for users to understand, so that they don't exploit credulity or lack of understanding among children, young people and vulnerable adults.

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4. Consider whether 'particular appeal' remains a useful tool as the main criterion for protecting children and young people from the potentially harmful impacts of gambling advertising, given that more general content may appeal to those groups too. Regulators could consider the extent to which features beyond child-friendly images and language are likely to also generate significant interest among these groups – 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.

5. Ensure that existing regulation and codes of practice are applied to the licensed eSports betting market as it develops Where eSports betting operators are licensed 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.

6. 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.

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

1.4.3 Recommendations for research

8. 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.

9. Establish greater context 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.

10. 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.

11. 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.

12. 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.

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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[4]. 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?

[4] Binde P. 2014. Gambling advertising: A critical research review. 2014.

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The findings within this report focus on questions of exposure, tone and format. This includes: a review of the evidence to date; an overview of the volume of advertising; insight into the experiences relayed by children, young people and vulnerable adults; and an analysis of the content of adverts. This report will provide the context to the analysis of impact, which will be explored in detail in the second, Full Synthesis report.

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 10 strands, an outline of these is given below. A more detailed outline of each of these strands is provided as an appendix to this report[5].

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[6]) 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[7].

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.

[5] This does not include strands 7 and 10 as at the time of writing these had not been completed. The data from these will be included in the full synthesis report.

[6] Binde P. 2014. Gambling advertising: A critical research review. 2014.

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

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.

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.[8]

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).

[8] 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.

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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[9]. 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 will provide a nationally representative measure of exposure and impact among children and young people. This strand is currently in progress, and likely to report in December 2019.

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

[9] 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.

2.2.9 Strand 10 – analysis of 'click through data'

This is led by Ipsos MORI and will include collection and aggregation of industry click-through data to ascertain conversion rate and engagement within online gambling-related advertising. This element is in progress and will be included in the Full Synthesis Report which will be published in due course.

2.3 Notes on interpretation

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

- 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%)[10]. 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 licences 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

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

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.

2.4 Acknowledgments

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3 The evidence to date

This chapter reviews the existing evidence base from the literature review conducted by the University of Stirling and data published by the Gambling Commission on Young People and Gambling 2018 and the Advertising Standards Authority (ASA) on Children's exposure to age-restricted TV adverts.

3.1 Key findings

- There is limited existing evidence in the UK on the impact of gambling advertising.
- Children and young people are regularly exposed to gambling advertising (often on TV or through social media).
- Existing evidence focuses on the link between sports and gambling advertising exposure.
- Three key advertising strategies emerged from the existing literature: building brand awareness, financial incentives and odds advertising.
- There is some evidence of children and young people being susceptible to these strategies, including their understanding of financial incentives and offers.

3.2 Existing evidence on exposure

3.2.1 There is limited existing UK based evidence on the impact of gambling advertising on children, young people and vulnerable adults

The search for relevant material for the literature review showed there was a lack of UK-based literature on the impact of gambling advertising. 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. Some further papers were identified after the initial search was complete, these have been included due to their relevance to the review. From a database search they identified 4,597 records which were narrowed down to 42 sources that met relevancy criteria and these were included for full data extraction. As shown in Figure 3.1, two thirds of the studies used came from Australia (62%) whilst only seven were from the UK (and just three of these were published in a peer reviewed journal). There was also a lack of qualitative work (9 studies only).

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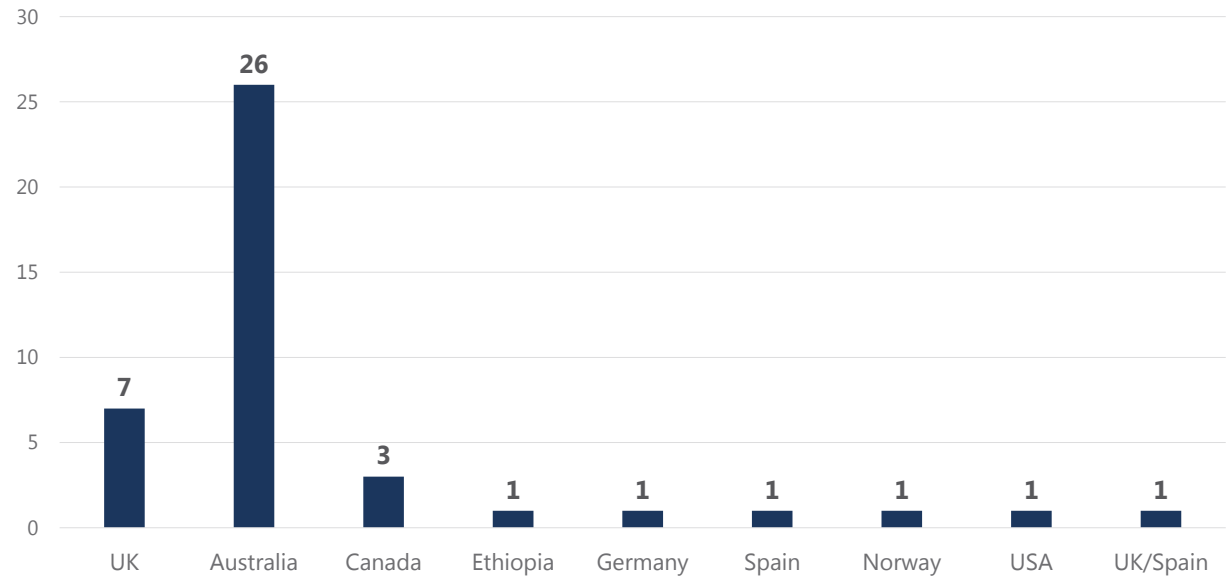
Figure 3.1: Country of research origin (Search run April 2018)



Source: University of Stirling

3.2.2 There is evidence of exposure of children and young people to gambling advertising, from a variety of channels

The Gambling Commission collects annual data on gambling participation amongst 11-16 year olds, which has included some data on exposure to gambling advertising. In 2018 interviews were carried out with 2,865 11-16 year olds in Great Britain[11]. This is a representative survey of pupils attending academies and maintained schools in England and Wales, with an additional booster sample of school pupils in Scotland. In terms of exposure, the 2018 data shows that children are most likely to have seen gambling adverts on TV and social media[12]. Two-thirds (66%) had ever seen gambling adverts on TV with two in five (43%) doing so at least once a week. This was whilst six in ten (59%) had ever seen a gambling advert on social media, one-third (33%) did so at least once a week. There was also evidence of children being engaged with gambling companies online as 12% followed a gambling company on social media. As well as this, seven per cent of those who had seen gambling advertisements or sponsorships were prompted to spend money on gambling when they had not planned to.

[11] Gambling Commission Young People and Gambling report 2018 can be found here: https://www.gamblingcommission.gov.uk/PDF/survey-data/Young-People-and-Gambling-2018-Report.pdf
Data was gathered from Ipsos MORI's Young Person Omnibus survey of 2,865 11-16 year olds in Great Britain comprising 2,679 11- 16 year olds attending academies and maintained schools in England and Wales and 186 young people attending maintained schools in Scotland. The research aims to represent pupils in curriculum years 7 to 11 (S1 to S5 Scotland) attending academies and maintained secondary and middle schools in England, Wales and Scotland. More technical information can be found here: https://www.gamblingcommission.gov.uk/PDF/Young-People-and-Gambling-2018-Technical-Note.pdf

[12] Data was not included in the University of Stirling literature review as this was published in November 2018, before this data was released.

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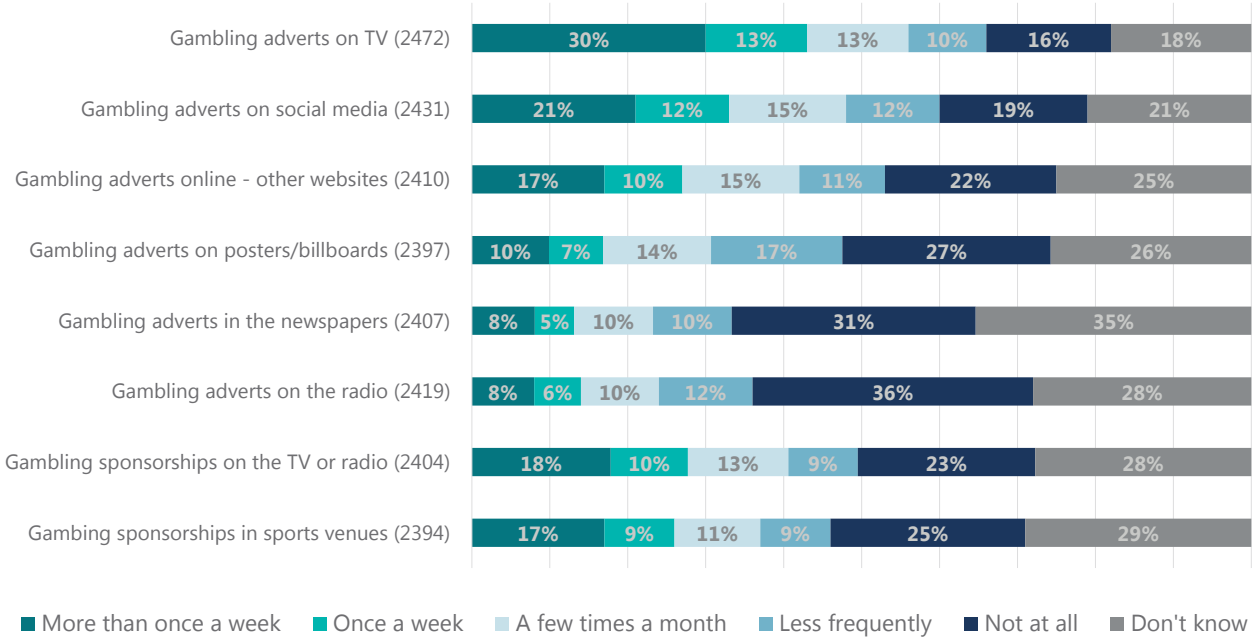
Figure 3.2: How often would you say you see gambling adverts and gambling sponsorships in the following places?[13] (Data collected February – July 2018)



Source: Gambling Commission Young People and Gambling report 2018, data gathered from 11-16 year olds, base size in brackets.

The Gambling Commission's research on gambling participation amongst those 18 years old and over shows that TV is also the most common channel through which adults say they were exposed to gambling advertising. 81% report having ever seen a gambling advert on TV (53% at least once a week)[14]. This was followed by sponsorships on TV or radio, advertisements online and then social media, whilst 86% of 18-24 year olds reported ever seeing any gambling advert[15].

A review of age-restricted TV adverts by the ASA from analysing BARB data[16], reported that children's exposure to gambling ads on TV increased between 2008 and 2017. This rose from 25%, an average of 2.2 ads per week in 2008 (the first full year where gaming and betting adverts were allowed on TV) to 2.8 per week by 2017. However, the number per week peaked in 2013 at 4.4 ads, and therefore has decreased by 37.3% from 2013 to 2017. In 2008, children's exposure to gambling ads constituted 1% of all TV ads they saw. This rose incrementally to a peak of 1.9% in 2013, and then decreased to 1.7% in 2017.[17]

The majority of TV ads for gambling that children have seen since 2011 (the first year when we can be confident about product breakdown information for gambling ads) were ads for bingo, lottery and scratchcards. Children's exposure to ads for sports-betting decreased from an average of one ad per week in 2011 to 0.4 ads per week in 2017. It is interesting to note that sports gambling advertising was not the only type of gambling advertising children and young people were

[13] Young People and Gambling 2018: https://www.gamblingcommission.gov.uk/PDF/survey-data/Young-People-and-Gambling-2018-Report.pdf
[14] Gambling participation in 2018: behaviour, awareness and attitudes https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-participation-in-2018-behaviour-awareness-and-attitudes.pdf
[15] There is currently a gap in capturing gambling behaviour of those aged 17 as the Commission's Young People and Gambling participation research covers those aged 11-16 and the Gambling Participation in 2018 study is amongst those aged 18 and above
[16] 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.
[17] 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 (such as gambling) being viewed by the average member of a group, e.g. children aged 4 to 15).

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exposed to on TV, and that the volume of sports gambling advertising has decreased, particularly as the existing literature often identified sports as a key area of exposure.

3.2.3 Exposure from sports, and sport sponsorship, was a key area explored in existing research

The Commission's data noted that exposure also comes from sports; 46% of 11-16 year olds reported that they had seen gambling sponsorships at sport venues (e.g. at football stadiums, on players' shirts or around the pitch)[9].

The literature review discussed the fact that many gambling adverts are found around sports events in advert breaks, team sponsorship, pitch-side advertising and sports talk shows. For example, analysis by the Guardian found that British viewers of the World Cup were shown almost 90 minutes of betting adverts during the tournament: this was 1.5 times as much as alcohol advertising and 4 times as much as fast food outlets[18].

The review highlighted that exposure would depend on the type of sporting event, as increasing sponsorship of teams in the English Premier League meant that there was also in-game exposure when watching a Premier League match, as well as in sports coverage shows such as Match of the Day. This also comes from pitch-side advertising[19]. Similar evidence was found elsewhere, such as Australia where gambling advertising can also form part of the live commentary and half-time breaks, for example discussing betting odds[20].

3.3 Themes and features

3.3.1 Gambling brands use a range of advertising strategies

There were three key advertising strategies that emerged from the existing literature: building brand awareness, financial incentives and odds advertising. Building brand awareness refers to reminding consumers of a brand without promoting a specific product and was often a feature of sports[21] [22] [23] [24]. Financial incentives came in many different forms (e.g. signup bonuses, risk free bets) and have become more complex; and the story is similar for odds advertising which has been argued to take advantage of gamblers' decision-making errors[25] [26]. To date, there is limited understanding of the impact of these advertising types. It is important to note that many of these studies come from Australia where regulations on gambling content are different to the UK.

[18] https://www.theguardian.com/media/2018/jul/15/children-bombarded-with-betting-adverts-during-world-cup

[19] Cassidy R, & Ovenden, N. Frequency, duration and medium of advertisements for gambling and other risky products in commercial and public service broadcasts of English Premier League football. (2017, August 10). http://research.gold.ac.uk/20926/

[20] Hing N, Lamont M, Vitartas P, Fink E. Sports-Embedded Gambling Promotions: A Study of Exposure, Sports Betting Intention and Problem Gambling Amongst Adults. Journal of Business Research. 2015; 13(1): 115-35. https://core.ac.uk/download/pdf/82259053.pdf

[21] Lopez-Gonzalez H, Griffiths MD. Betting, Forex Trading, and Fantasy Gaming Sponsorships—a Responsible Marketing Inquiry into the 'Gamblification' of English Football. International Journal of Mental Health and Addiction 2018; 16(2): 404-19. https://link.springer.com/article/10.1007/s11469-017-9788-1

[22] Cassidy R, & Ovenden, N. Frequency, duration and medium of advertisements for gambling and other risky products in commercial and public service broadcasts of English premier league football. 2017. http://research.gold.ac.uk/20926/

[23] Bunn C, Ireland R, Philpott M, Minton J, Holman D, Chambers S. Shirt sponsorship by gambling companies in the English and Scottish Premier Leagues: global reach and public health concerns. Soccer and Society 2018: 1-12. https://www.tandfonline.com/doi/full/10.1080/14660970.2018.1425682

[24] Moodie R, Lindsay S, Westberg K, Lewis S, Thomas S, Jones S. Eat, drink and gamble: marketing messages about 'risky' products in an Australian major sporting series. BioMed Central; 2013. https://bmcpublichealth.biomedcentral.com/articles/10.1186/1471-2458-13-719

[25] Philip WSN. How bookies make your money. Judgment and Decision Making, Vol 10, Iss 3, Pp 225-231 (2015) 2015; (3): 225. http://journal.sjdm.org/14/141026a/jdm141026a.pdf

[26] Newall PWS, Thobhani, A., Walasek, L. & Meyer, C. Impulsiveness and urgency: Gambling advertising and the 2018 soccer world cup. 2018. https://www.researchgate.net/publication/326888615_Impulsiveness_and_urgency_Gambling_advertising_and_the_2018_soccer_World_Cup/citation/download

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3.3.2 Certain features that resonate with children, young people and frequent gamblers have been identified

There was some evidence of children and young people being susceptible to the strategies outlined above. For example, there was evidence of children believing financial incentives meant gamblers could not lose[27]. It was also suggested that they could become attracted to bets with high odds[14] but that they also could misunderstand odds advertising[28]. Also, three quarters of children in Australia said that they saw gambling advertising as a normal part of sport and recalled examples of financial incentives and odds advertising[15].

Some other features that were noted were as follows:

- Attraction to adverts with animated characters and bright colours[29]
- Sports brands that used humour were appealing[30]
- Showing gamblers as skilful[14]
- Thinking gamblers could not lose[14]
- Seeing gambling as part of a social activity[17] and potentially a social pressure[31]
- Sign up bonuses as a trigger for young people to starting gambling[32] [33]
- Risk free messages[34]
- A normal part of sport[15]
- Celebrity endorsements and characters with which children are familiar, make activities seem attractive, and normalise gambling as part of sport[15] [35].

For problem gamblers there were concerns about free bet and risk free messages[36] and in play betting where high frequency bets could be made throughout sporting events[37] [38].

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3.4 Key gaps that emerged

The literature review exposed gaps in the research in terms of understanding the impact of gambling advertising on children, young people and vulnerable adults.

There was little information on frequency of exposure online (including through social media). The literature review drew on evidence of exposure during sport, but other areas were not explored in the literature. As discussed above, the search for relevant literature showed that there is a lack of UK-based literature on gambling advertising. The literature review also suggested a need for qualitative research to provide greater depth and understanding as well as longitudinal research to track the influence on behaviour over time.

One of the objectives of this research was to explore how the influence of marketing and advertising compares with other factors, such as parental gambling, parental facilitation, and moral or religious beliefs. No existing evidence was found within the search criteria used for the literature review.

This research project has helped to address some of these research gaps but there is still a need for further research. For example, a longitudinal study to look at behaviour over time and for research with a focus on eSports, which was not a specific research area for this study but has been identified as an area where further research is needed.

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4 Evidence of volume and likely exposure

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.

4.1 Key findings

Key findings on the volume of gambling advertising and therefore likely exposure of children, young people and vulnerable adults are as follows:

- Overall, from 2015-2018, there has been a clear increase in the volume and spend 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, gambling advertising is also prominent in the afternoon on TV and on Twitter, and in the morning on Radio.
- 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'; however, it is not clear whether this strategy targeted traits relating to gambling or relating to being a young person.
- Overall, there was limited evidence from the avatars research that individual targeting is widely employed with gambling advertising; strategies appeared to be targeting particular websites as opposed to individual user personalities
- Nonetheless, an absence of direct targeting did not prohibit exposure to gambling marketing and advertising. It is likely that children, young people and vulnerable groups will be exposed to gambling advertising, particularly if they are sports fans. In some cases, such as on Twitter, there is clear evidence that children and young people are actively engaged in gambling related material.
- The research identified a number of opportunities for technology to be better utilised to reduce the exposure of children, young people and vulnerable adults to gambling advertising online and on social media.

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4.2 Overall evidence on volume

4.2.1 Spend and volume of advertising have generally increased across media sources

Analysis provided by Ebiquity provides insight into the volume of and estimated spend on paid-for gambling advertising. Overall, this 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.

Analysing advertising volume and spend data

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 channel over time. It should be further noted that the analysis of TV, Radio, Outdoor, and Press captures only individual spots, sites or insertions; for the purpose of this study, these have not been further processed to estimate the number of people who may have seen the advert.

Table 4.1: Monitored volume and estimated spend of gambling advertising by media type, (2015-2018)[39]

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[40]	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

[39] Media sources are not directly comparable to each other this is because the data is showing different things e.g. direct mail and door drops report on mailings which relate to how many are likely to have been seen this across the country. In contrast, Ebiquity capture the number of placements for Radio, TV, and Outdoor – not the number of people who are likely to have seen this.

[40] A high cost per pack is attributed which may over-inflate the spend in this media, however will be comparable on a like-for-like basis across

	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)[41]	Number of total banner ad impressions captured across sample of most popular sites	-	-	649,741,454	550,043,291
	Estimated spend	-	-	£10,831,491	£8,942,818

As part of a separate study, data collected by Regulus on behalf GambleAware presents a similar picture of increased spend on advertising by the gambling sector. However, it is important to note that this includes wider costs such as marketing teams, rather than just the cost of placing ad advert. More information is included in the box below.

Regulus research[42]

Regulus Partners conducted an analysis and estimate of GB marketing spend by GB licensed operators across 2014 to 2017 based upon both operator spend and types of marketing spend[43]. They found that:

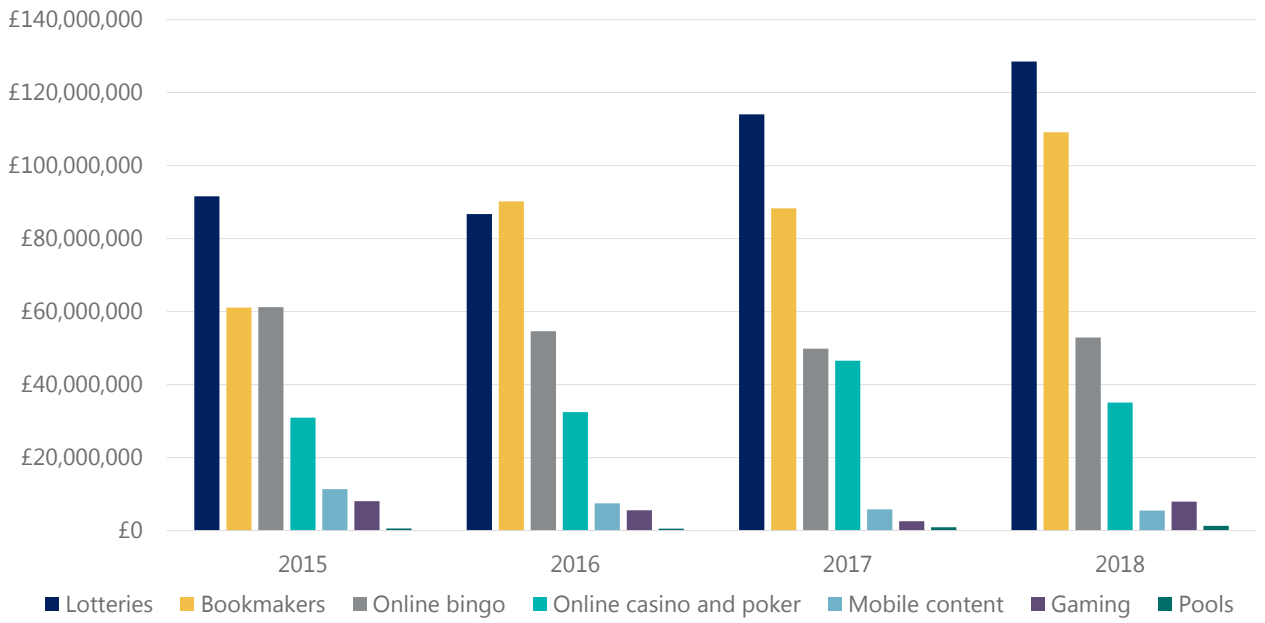
- Total spend by gambling companies on marketing had gone up by 56% since 2014, and had hit £1.5bn
- Most marketing activity is now on the internet, with companies spending five times more online than on television
- Direct online internet marketing costs were £747 million, comprising almost half (48%) of total gambling marketing spend
- Advertising through marketing 'affiliates' – websites, tipsters and publications who earn commission for generating new business for the gambling companies – stood at £301 million, nearly one fifth (19%) of total expenditure
- TV gambling advertising - £234 million, just 15% of total gambling marketing spend
- Social media - £149 million, more than tripling over the three years, and 10% of total gambling marketing spend
- Sponsorship - £60 million, double the amount spent in 2014 (£30m).

4.2.2 The amount spent on advertising varies across sectors

Spend on lotteries had increased over the four years from 2015 to 2018, as has spend on pools. Bookmakers, online bingo and gaming had increased spending from 2017 to 2018 but this had been decreasing in the years before. Mobile content spend has decreased across the four years and online casino and poker spending dropped from 2017 to 2018.

[41] Web spiders capture the display banners from the UK's most popular advertising supported websites – visiting 1,000 sites in total. Estimates of spend is based on this same sample of websites.
[42] Full information on Regulus research can be found here: https://about.gambleaware.org/news/spend-on-gambling-marketing/
[43] More detail on the methodology can be found here: http://about.gambleaware.org/media/1854/2018-11-24-rp-ga-marketing-sources-and-method-final.pdf

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



Source: Ebiquity

4.2.3 Betting advertising is widely shared on Twitter

Over nine months in 2018, 888,745 Tweets were sent from a Twitter account known to be related to betting. Table 4.2 shows that each 'bookmaker' account sent out an average of 14 Tweets per day and that overall 60% of these were directly relevant to or advertised gambling[44]. 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 eSports).[45]

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[46]	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

[44] 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.'

[45] 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.

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

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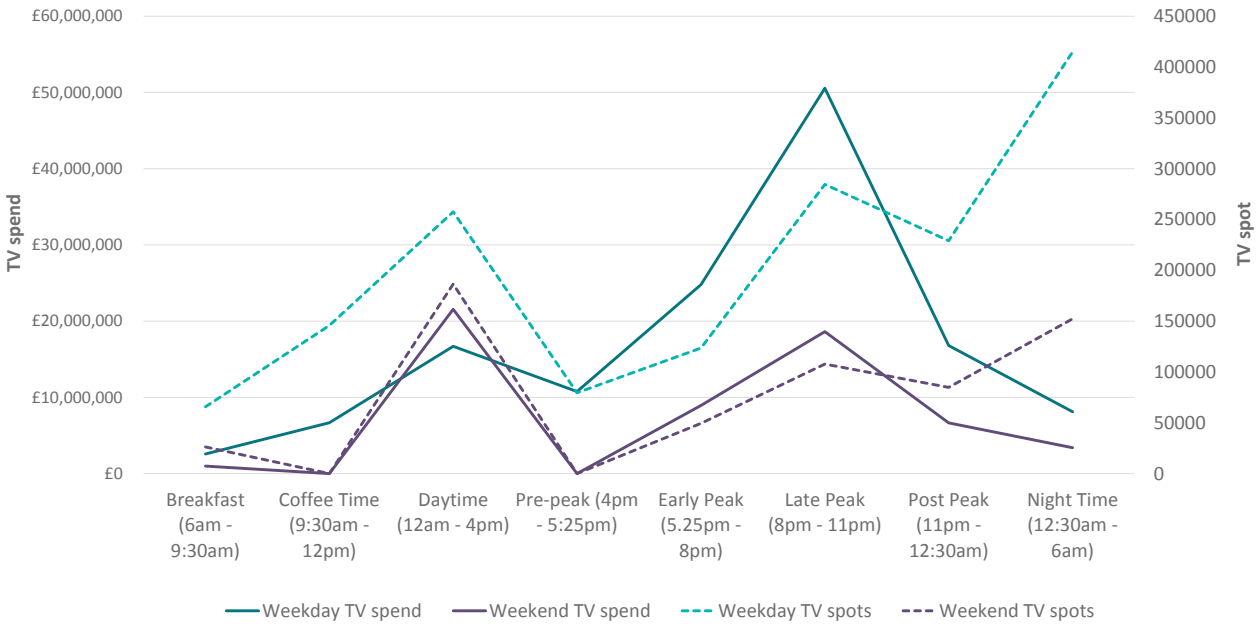
4.2.4 Exposure captured through the avatar research is difficult to benchmark but does not point to universal widespread exposure through paid-for online ads

In total 2,599 gambling advert impressions were displayed to the avatars over the 34 day data collection period. These advert impressions represented 37 different gambling companies. This was an average of two gambling ads for every 100 site views on desktop and 1 gambling ad for every 100 site views on mobile. From Ebiquity's main monitoring panel[47] this represents 4.3% of all captured ad impressions. This appeared to be high compared to alcoholic drink adverts which made up 0.18%, and all toilet and cosmetic advertising which made up 2.76%, but low when compared to 'destination' advertising (e.g. nightclubs, museums, theatres, zoos) which made up 7.42%.

4.2.5 Gambling advertising takes place throughout the day

Across a range of media there is there is significant advertising activity throughout the day. Within TV for example, there are nearly as many Daytime spots (12am-4pm) during weekdays as there are during Late Peak (8pm-11pm); during the weekends, there are more ads during the 12am-4pm slot. 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).

Figure 4.2: TV gambling advertising by time of day (October 2017 – September 2018)



Source: Ebiquity

The volume of gambling advertising on Twitter largely takes place before the evening, peaking at around 4pm. Gambling advertising on Twitter also continues through the night, with 58,281 Tweets collected between the hours of 1am-5am, with 264 accounts (64%) sending at least one Tweet during this time of the night. This is partly driven by reference to global sporting events, particular within eSports.

4.3 Evidence of volume across channels

4.3.1 Lottery tops spend across most platforms

Across all traditional media platforms monitored lottery companies were identified as among the top spenders from October 2017-September 2018, alongside bookmakers. The highest spend was on Door Drops and TV. For Door Drops this aligns with evidence from Ebiquity's consumer panel which suggested that this relates to a push by the People's

[47] This is Ebiquity's main media monitoring panel and is separate data source to the avatar data collection carried out for this project

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.

Despite the prominence of lotteries across most types of media during this time period, it is also important to note that bookmakers were the top spenders across the online advertising data captured.[48]. The evidence from the social media analysis and online avatars strand supports this, showing a large volume of bookmakers advertising online.

Table 4.3: Gambling companies spending the most money by media type – Top 5 (October 2017 – September 2018)

TV	Press	Radio	Cinema[49]	Door drops	Direct mail	Online[50]	Outdoor
National Lottery (£29,077,032)	Ladbrokes (£12,972,984)	National Lottery (£5,593,099)	National Lottery (£259,350)	People's Postcode Lottery (£35,007,083)	Postcode Lottery (£3,707,835)	Betfair (£2,147,845)	National Lottery (£4,332,306)
Tombola (£18,201,413)	Health Lottery (£9,156,797)	Bonne Terre (Sky Bet, Sky Bingo, Sky Vegas, Sky Casino and Sky Poker) (£1,321,402)	Victor Chandler (£201,349)	Tombola Arcade (£6,124,550)	The Football Pools (£450,374)	Bet365 (£1,837,468)	Paddy Power (£195,765)
Postcode Lottery (£17, 795,911)	Coral (£7,959,273)	Betfair (£768,109)	-	STV ELM (£10,963)	Littlewoods Promotions (£130,243)	Paddy Power (£994,613)	William Hill (£176,793)
Bonne Terre (Sky Bet, Sky Bingo, Sky Vegas, Sky Casino and Sky Poker) (£12,760,669)	Paddy Power (£6,156,380)	Postcode Lottery (£751,643)	-	YourLottoService UK (£7,430)	Broadway Gaming (£75,613)	Health Lottery (£831,035)	Unibet (£127,386)
Gala Bingo (£9,020,877)	William Hill (£5,854,894)	Paddy Power (£642,680)	-	The Football Pools (£2,564)	News UK (£46,845)	Virgin Games (£452,963)	Betway (£75,936)

4.3.2 Sporting events affected advertising spend

Advertising spend was also associated with sporting events. As illustrated in the graph below, there were peaks in estimated spend around March 2018 and June 2018. The first peak coincided with the Cheltenham Gold Cup, which was held on Friday 16th March 2018. Within this time, estimated press spend peaked to c.£3.2m (compared to c.£1m the following week). These press ads were more likely to be found in the second half or back pages (where the sports section is often located), than the front half or front pages. Estimated spend by bookmakers also peaked considerably in this week, with the estimated spend on advertising equated to c.£4.6m (compared to c.£1.3m the following week). Brands such as Ladbrokes, William Hill and Coral also increased their spending on gambling advertising at this point in time.

A similar pattern was found when looking at activity around the World Cup. 5,786 Tweets related to betting were sent on 18th June, which coincided with England's first game against Tunisia. There was also a peak in estimated spend that

[48] 'Online' here only refers to online data on 'displayed advertising'; this excludes advertising on social media, in-video, and 'paid search' advertising.
[49] From the data supplied to Ebiquity by Digital Cinema Media (DCM) and Pearl & Dean there were only two gambling companies listed in this time period as spending money on cinema advertising.
[50] 'Online' here only refers to online data on 'displayed advertising'; this excludes advertising on social media, in-video and 'paid search' advertising.

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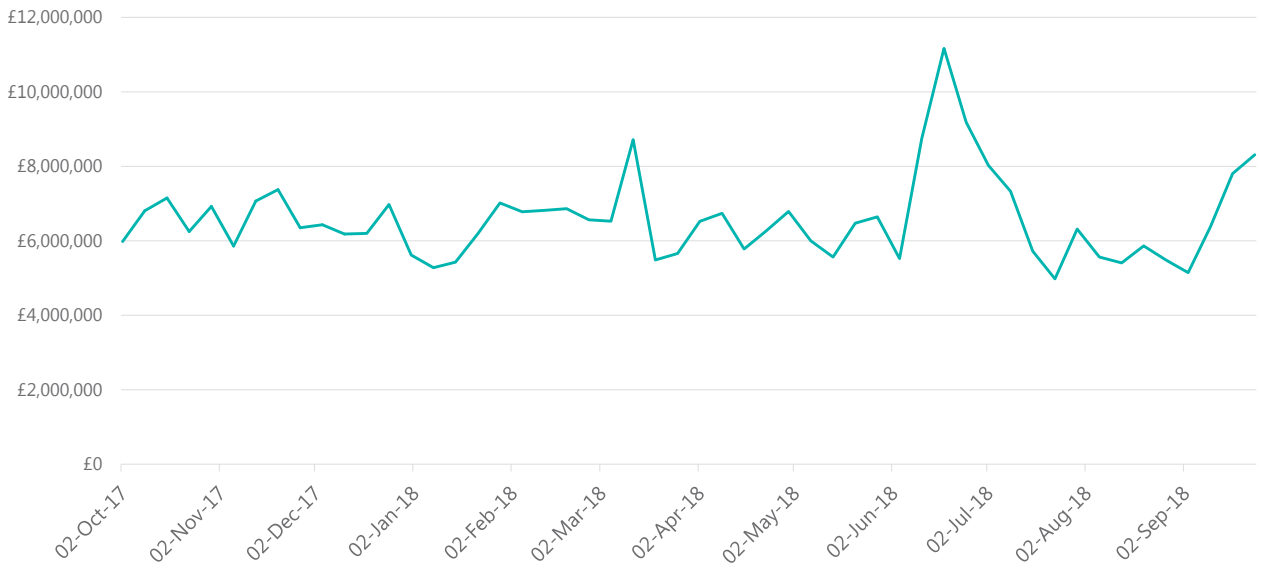
occurred in that week commencing 18 June 2018, shown in Figure 4.2 below. Similarly, estimated spend increased for press during this time period, from c.£1.2m in the week commencing 4th June to c.£3.4m in the week commencing 18 June 2018. During this time, estimated spend for television increased substantially from c.£3.2m to c.£5.8m. Bookmaker estimated spend peaked at this point from c.£2m to c.£6.7m, as did spend by brands such as Paddy Power, Ladbrokes and William Hill.

This confirms that patterns in gambling advertising spend are adjacent to major sporting events. During this time, bookmakers, especially, increased their spend on gambling advertising.

Figure 4.3: Estimated overall spend (October 2017 – September 2018)



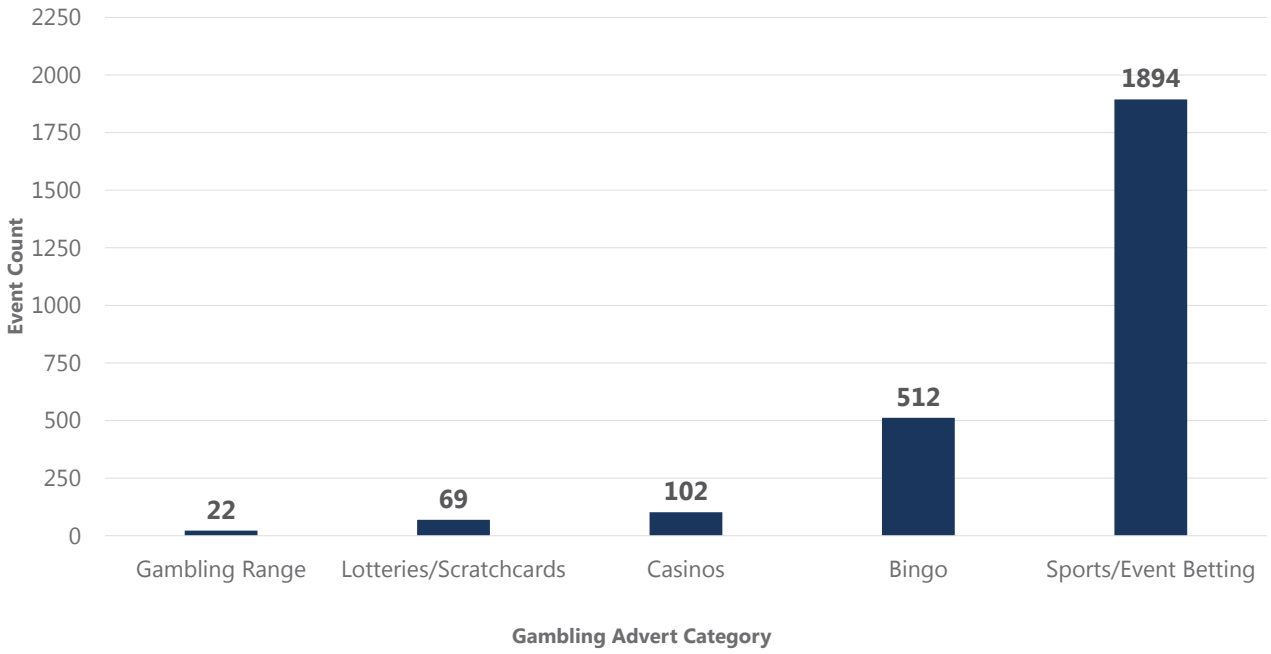
Source: Ebiquity

4.3.3 Sports is a key focus online as well, including in social media

Sports advertising features heavily online too with 73% of the adverts shown to the avatars across the 34 day period being sports or betting related, as shown below. Alongside this 45% of the advert impressions served were on sport websites and all avatars were exposed to gambling adverts more often when they visited sports websites (this ranged from 49-59% per avatar[51]).

[51] This does not include the score for the Young Person Gambler 2 avatar for which this figure was 20%.

Figure 4.4: Types of gambling adverts shown to avatars (September – October 2018)



Source: Ebiquity

The most common brands captured within the online avatar research to advertise were sport / betting companies, with the exception being GalaBingo. Table 4.4 illustrates the number of advert impressions viewed in total by all avatars by gambling brands, and provides a comparison to the number of gambling advert impressions that were viewed by the UK neutral avatar. The UK neutral avatar was blank i.e. it had no browsing habits or personality and was used as a control to compare to the outcomes of each of the personalised avatars.

Table 4.4: Number of advert impressions by brand – Top 20 (September – October 2018)

Brand	No. served to across the 10 avatars	No. served to UK neutral avatar
Gala Bingo[52]	504	0
Bet365	426	35
Sky Bet	291	40
Betboro	288	29
888sport	177	19
William Hill	173	11
Betway	114	11
Coral	85	14
BetVictor	77	6
Betfair	66	6
Football Index[53]	56	1
The Sun Bet[54]	53	5

[52] All 504 of these ads were served to the Young Person 2 Gambler avatar. This suggests that Gala Bingo was employing a more sophisticated advertising targeting strategy than other operators.

[53] A gambling platform that allows players to bet on the future success of football players

[54] Football betting platform (now closed)

PlayOJO[55]	39	2
Ladbrokes	32	2
EuroMillions	25	1
888.com	22	2
888Casino	22	2
Mr Green[56]	19	2
Paddy Power	19	1
Insider Lifestyles[57]	17	3

On social media, across the 888,000 Tweets analysed from 417 gambling related accounts over the 9-month period, all the top tweets referenced sport. These were dominated by established, 'traditional' gambling operators, but with a few notable exceptions. For example, as shown in Table 4.5 below, the most shared Tweet in the dataset, was sent by Betway's eSports division and invited users to enter a giveaway to win stickers of popular eSports teams. This offer was potentially a "name capture" exercise, which would have allowed Betway to collect the details of eSports fans to target in future marketing. A couple of tipsters also feature in this list.

Through different types of media channels it is clear that interaction with sport is a key way to be exposed to gambling advertising.

[55] Online casino platform

[56] Online casino platform

[57] News / entertainment website that features Lotto games (LottoGo)

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Table 4.5: Most Retweeted Tweets sent by gambling-related accounts – Top 10 (March – November 2018)

Tweet Text	Account	Account type	RT Count	Favourite count
Enter our brand new giveaway where you have the chance to win a @FACEIT 2018 London CS:GO Major Championship Mega Bundle! Stickers for days bois! Enter here: [link] [image]	betwayesports	esports	26,368	873
Buckle up Stoke fans. Some guy called Henry has given you an absolute roasting. Sit back, relax and enjoy. It's #FanDenial. [video]	paddypower	bookmaker	18,276	34,708
La Liga since 2009, when Cristiano joined Real Madrid: Goals Messi - 329 Ronaldo - 311 Assists Messi - 122 Ronaldo - 88 Titles Messi - 6 Ronaldo - 2 Top Goalscorer Messi - 5 Ronaldo - 3 Player of the Year Messi - 5 Ronaldo - 1	bet365	bookmaker	13,786	23,765
I saw this on Facebook earlier and thought it was well worth a mention due to the England game @ 2pm as I know this does happen when England score. RT to share and pass this on please □□ [link]	footy_tipsters	tipster	9,251	8,680
Most goals, assists, key passes and dribbles this season: Premier League: Salah De Bruyne Özil Hazard Bundesliga: Lewandowski Müller James Coman Ligue 1: Cavani Payet/Depay Payet Neymar Serie A: Immobile Luis Alberto Gómez Anderson La Liga: Messi Messi Messi Messi	bet365	bookmaker	7,633	15,515
Besiktas fined £29,880 for a cat running on the pitch. Russia fined £22,000 for racism. [link]	paddypower	bookmaker	7,265	15,444
Deontay Wilder wanted to show-off how hard he punched on ESPN He broke this mascot's jaw after not realising there was a person inside □ [video]	ladbrokes	bookmaker	7,026	13,802
Pickford's saves Maguire's headers Trippier's free-kicks Kane's goals Gareth's waistcoat Thanks for the memories, England. [link]	bet365	bookmaker	6,882	35,081
More shocking scenes at Ascot yesterday after some very unsavoury scenes at Goodwood last week! Something needs to be done to sort this problem out ASAP! □ [link]	twenclosure	tipster	6,576	10,277
With Ireland not going to Russia, we're supporting Nigeria at the World Cup for several significant reasons: ✓The kit looks class ✓They play in green ✓ Nigeria consumes more Guinness than Ireland #COYBIG #ENGNGA	paddypower	bookmaker	5,838	8,890

4.3.4 Gambling advertising was prevalent in some sports broadcasts but not all – official sponsorship affected this

From the analysis of 10 professional sporting events broadcast in the UK across 2018, it was found that gambling advertising was most prevalent in boxing and football, both of which had gambling sponsors of the teams or the overall competition. The boxing match analysed (Tony Bellew vs. Oleksandr Usyk 11 November 2018) had on average one

gambling advert every 13 seconds, and William Hill who was the official sponsor of the event was the most popular brand featured (73%). As would be expected, most of the references were for sports betting brands.

Across the five football matches analysed, there was on average a reference every 21 seconds. But exposure varied by match, depending on the competition and teams featured. For example, there were a high number of references found in the televised English (667 and 974 total references per game) and Scottish Premier League matches (920 total references per game) compared with the televised international football (9 references) and Champions League (25 references) matches. Whilst in televised matches where both teams were sponsored by gambling brands there were over 900 references per broadcast (Rangers versus Celtic and Bournemouth versus Crystal Palace).

In contrast to boxing and football, in Formula One (British Grand Prix Channel 4 on 8 July 2018) there were no gambling adverts recorded across the entire broadcast, including in the commercial breaks. In the tennis match (French Open tournament (men's final) ITV1 10 June 2018) gambling references only occurred approximately once every nine minutes, when an advert featured at the start and end of advertising breaks (known as a 'sponsorship lead-in'). Both these tournaments had no reported official gambling brand sponsor.

Figure 4.5: Examples of gambling adverts from the matches analysed[58] (2018)

The rugby union match analysed (Scotland vs. England) illustrated that it is not just bookmakers that advertise alongside sport. All of the references captured in this match (100%) were for the National Lottery funded Sports Scotland agency for sport, with the National Lottery brand logo featured in all references (100%).

[58] 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)

Table 4.6: Summary of gambling references for boxing, rugby union and tennis (2018)

Variable	BOXING	RUGBY UNION	TENNIS
Total references	358	101	26
Average references per minute of broadcast	4.7 (reference every 13 seconds)	0.56 (reference every 107 seconds)	0.11 (reference every 545 seconds)
Proportion of references in play	47%	92%	4%
Proportion of references out of play	53%	8%	96%
Most featured brand	William Hill (73%)	Lottery funded Sports Scotland	Bet365 (85%)
Median duration of references	9 seconds	2 seconds	7 seconds
Total duration of references	84 minutes	4.8 minutes	4.5 minutes
Total number of identical references[59]	2,208	101	26
Logo[60]	99%	100%	96%
Lower risk messages[61]	0%	0%	96%
Age restriction messages[62]	<1%	0%	96%

[59] Number of identical references visible at the same time (e.g. multiple pitch borders).
[60] Did a logo appear on the image
[61] Lower risk message (e.g. When the fun stops, STOP).
[62] E.g. 18+

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Table 4.7: Summary of gambling references in television and radio football broadcasts (2018)

Variable	Television						Radio
	All television combined	Celtic vs. Rangers	England vs. Italy	Tottenham vs. Barcelona	West Ham vs. Man United	Bournemouth vs. Crystal Palace	Crystal Palace vs. Tottenham
Total references in broadcast	2,595	920	9	25	667	974	18
Average references per minute	2.75 (reference every 22 seconds)	6.18 (reference every 10 seconds)	0.05 (reference every 1200 seconds)	0.12 (reference every 500 seconds)	3.95 (reference every 15 seconds)	4.01 (reference every 15 seconds)	0.14 (reference every 429 seconds)
Proportion of references in play	77%	81%	11%	0%	73%	78%	22%
Proportion of references out of play	33%	19%	89%	100%	27%	22%	78%
Most popular location of references	Border of play (38%)	Area of play (43%)	Ad break (89%)	Ad break (60%)	Border of play (50%)	Area of play (29%)	-[63]
Most popular format of references	Branded merch. (41%)	Branded merch. (49%)	Commercial ad (89%)	Electronic ad (36%)	Static ad (44%)	Branded merch. (38%)	Commentator voice (56%)
Most featured brand	Betway (27%)	Multiple brands (49%)	William Hill (22%)	Bet365 (24%)	Betway (97%)	M88 (58%)	Betfair (83%)
Median duration references	5 seconds	5 seconds	30 seconds	4 seconds	6 seconds	5 seconds	8 seconds
Total duration of references	377.0 minutes	116.5 minutes	3.8 minutes	3.5 minutes	127.0 minutes	126.2 minutes	4.3 minutes
Total number of identical references[64]	11,818	3,164	9	73	4,718	3,854	1
Logo[65]	99%	99%	89%	100%	100%	100%	78%
Lower risk messages[66]	3%	2%	67%	20%	2%	3%	44%
Age restriction message	3%	2%	78%	20%	3%	3%	44%

[63] Coding was not possible here as match broadcast on the radio therefore there were no visuals
[64] Number of identical references visible at the same time (e.g. multiple pitch borders).
[65] Did a logo appear on the image
[66] Lower risk message (e.g. When the fun stops, STOP).

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4.4 Likelihood of exposure for children, young people and vulnerable groups

4.4.1 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, there was also no suggestion of gambling companies specifically targeting child-like or problem gambling traits[67] within a user browsing history; and no examples of gambling adverts being placed on the top 20 children's sites.

However, it is important to note that as documented in the box below, the ASA has also carried out research into children's exposure to gambling adverts. They visited a much greater number of children sites and found some instances of gambling ads being placed on children's sites outside of the top 20 sites visited as part of the research for this study.

ASA avatar research[68]

Over a two week monitoring period last year the ASA identified ads by 43 gambling operators in non-logged-in, online environments. Five of those gambling operators, NetEnt Product Ltd (Vikings Video Slot), Evoke Gaming Ltd (RedBet), Multilotto UK Ltd, Platinum Gaming Ltd (Unibet) and Skill On Net Ltd (PlayOjo), broke the strict advertising rules which prohibit gambling ads being targeted at under-18s.

The ASA collected data on the 10,754 times when ads were served to the child avatars (ad impressions) across 24 children's websites and 20 open-access YouTube channels. In total, it found:

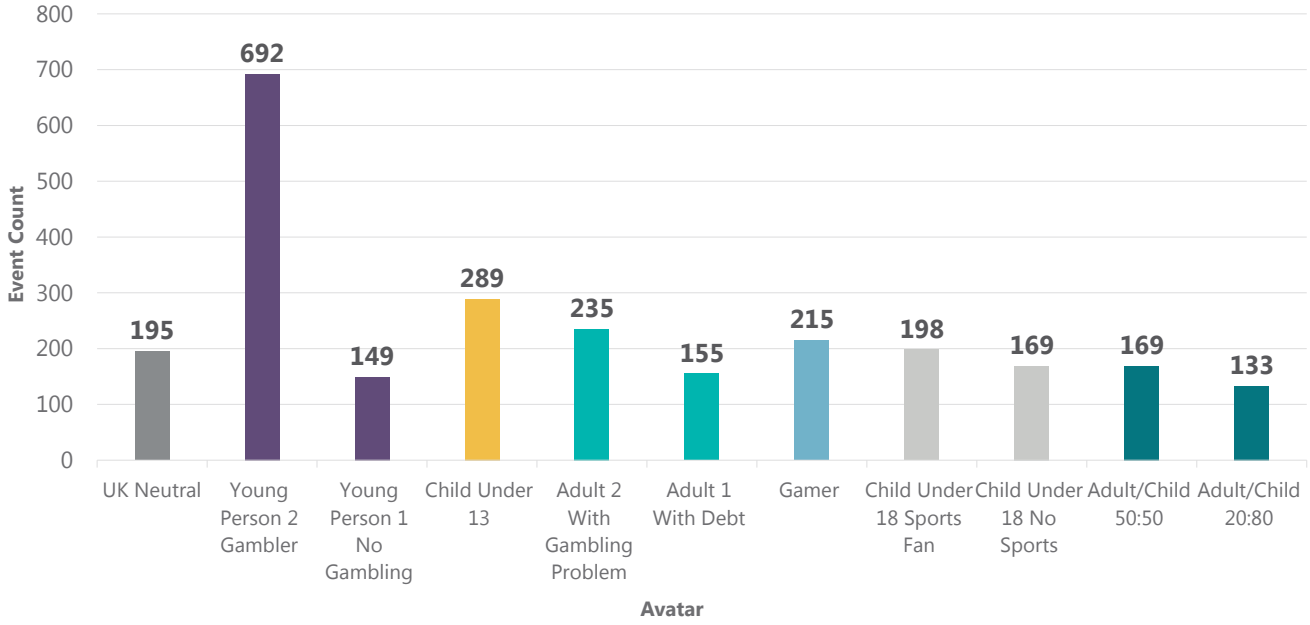
- Gambling ads were served to the child avatars on 11 of the children's websites monitored
- 23 individual gambling ads were seen by the child avatars on those 11 children's websites a combined total of 151 times – 1.40% of the total ad impressions
- One gambling operator (Vikings Video Slot) was responsible for 10 ads and 122 of the ad impressions (81% of the 151)
- No gambling ads were served on any of the open-access YouTube channels included in the research.

4.4.2 Children are not screened out of online advertising

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. As Figure 4.6 below demonstrates, all avatars were served gambling adverts regardless of their specific personalities.

[67] 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 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.
[68] https://www.asa.org.uk/news/harnessing-new-technology-gambling-ads-children.html

Figure 4.6: Number of gambling ads served by avatar type (September – October 2018)



Source: Ebiquity

The Child Under 13 and Adult 2 with Gambling Problem saw a high proportion of gambling advert impressions when compared to the UK neutral avatar (which had no previous browsing history to draw from). However, through deconstructing the data, there is no evidence to say that any advert was specifically aimed at either of these groups – i.e. other avatars saw the same creatives, but less frequently. This variation is likely to have occurred organically through the randomised methods used, and through the natural rotation of advertising within each website. The advert brands most likely to be viewed by the Child Under 13 and the Adult 2 with Gambling Problem avatar are Bet365 (24% and 22% respectively) and Sky Bet (17% and 18% respectively). In terms of the sites where the adverts were viewed by these avatars, the majority were seen on oddschecker.com (a more detailed overview is shown in Table 4.8). 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.

However, the research identified a clear-cut example of targeted advertising based on characteristics of their browsing behaviour. As shown in Figure 4.6, 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.

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Table 4.8: Top 10 gambling adverts viewed by Child Under 13 and Adult 2 with Gambling Problem by site (%) (September – October 2018)

Brand	Child Under 13	Adult 2 with Gambling Problem
oddschecker.com	31%	31%
sportinglife.com	16%	18%
livescore.com	11%	15%
livescores.com	11%	9%
football365.com	7%	6%
espn.co.uk	5%	2%
mirror.co.uk	3%	5%
espncricinfo.com	3%	1%
bristolpost.co.uk	1%	2%
goal.com	1%	2%

4.4.3 Children are following and engaging with betting related accounts on Twitter

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, 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. We also found 13,000 replies to and retweets of gambling content sent from accounts belonging to children in the UK. The method used to estimate age is summarised below; further detail can be found in the appendix at the end of this report.

Twitter age classification

In order to investigate the actual makeup of the audience for gambling advertisements on Twitter, researchers at Sussex University's Text Analytics Group worked with Centre for Analysis of Social Media at Demos to train a second type of classifier - a Multi-View Neural Network (MVNN) – able to make an assessment of a Twitter user's likely age. This classifier uses various public details concerning a user's profile - for example, their user description, or the platform they are Tweeting from - to assign them to one of three age ranges: 0-15, 16-23, and 24+. It should be noted that this method will ascertain a user's self-reported age, and will not detect purposefully falsified accounts. This was done using Method52 a piece of software developed by Centre for Analysis of Social Media in partnership with Sussex University to enable the collection and analysis of large, online datasets.

In testing, the algorithm used in this report was found to be 67% percent accurate in making decisions across all three age ranges, and 78% accurate when classifying users in the 0-15 range. The latter is the age range which we concentrate on in this report.

Algorithmic classification on text has its limits. Method52's classifiers are presently unable to analyse images, and the time needed to train and adjust a classifier can make it difficult to cover every interesting category of data. To help overcome these issues, and explore further subcategories of data, samples of Tweets containing images and classified as 'bets', along with Tweets not classified as relevant to gambling, were shared with researchers from the University of Bristol, who performed a close manual coding to further explore this content.

4.4.4 Children who are sports fans are likely to be exposed

As well as children not being screened out of receiving gambling advertising it is likely that if they are a sports fan, they would also be exposed. The top 5 sites where the gambling impressions occurred all relate to sport or online betting. Broadly speaking, when looking at website categories, 45% of all advert impressions occurred on sport websites, 27%

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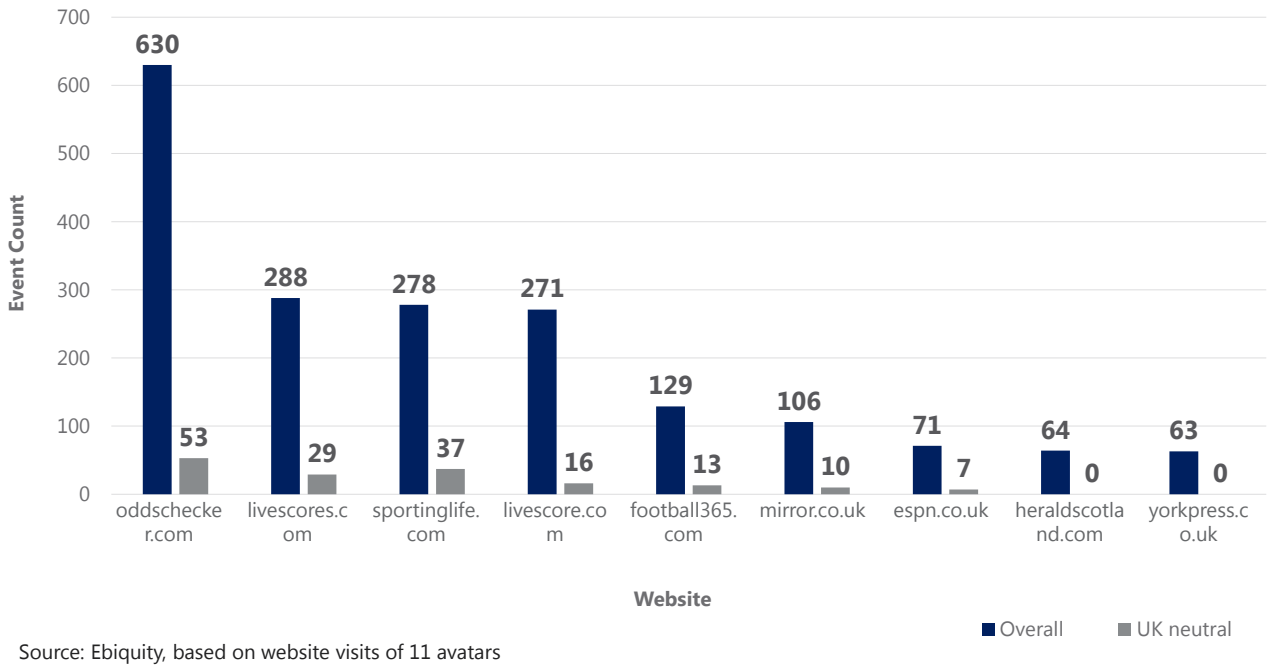
occurred on news / information sites and 24% on online gambling sites. Therefore children, young people and vulnerable groups could potentially be exposed to gambling adverts if they were visiting these sites[69].

Figure 4.7: Number of advert impressions by website (top 9) (September – October 2018)



Source: Ebiquity, based on website visits of 11 avatars

There is also some evidence to indicate that the 'Child Under 18 Sports Fan' was targeted with gambling advertising to an extent by the brand Football Index. Over the course of the fieldwork, 52% of all their adverts were shown to this one avatar. However, more substantial research would need to be done in order to conclude that behavioural targeting occurred in this specific case.

4.4.5 More could be done to utilise technology to lower exposure

From the avatar research no evidence was found to suggest steps had been taken to restrict exposure to gambling advertising of vulnerable adults and children based on their known browsing history. Yet the evidence of some targeting (in the form of the Child under 18 Sports Fan and the Young Person 2 Gambler) suggests that more could be done to ensure adverts are not shown to those with a child, young person or vulnerable profile. Within this, 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[70]. GamBan advertising was only shown to this avatar, in total there were 117 advert impressions by GamBan.

This provides evidence to suggest that gambling problem behaviours can be identified by their user data and therefore could be used to apply avoidance rules, meaning that these individuals would not be targeted with gambling advertising. As such, it is possible to suggest that if gambling companies have the ability to target certain gambling behaviours, then they also have the ability to avoid advertising to children and vulnerable groups. The feasibility of doing so should be discussed further with gambling and advertising companies.

[69] It is important to note here that 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 did mean 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 unlikely that an individual would conduct such an intense amount of online browsing activity as to visit 150 sites everyday.

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

Within social media, Twitter offers a free age screening service to 'a select number of advertising partners'. If this software is applied it prevents a user from following an account if they have declared themselves to be under 18, or have not set a date of birth in their user profile. Although the data is not available on how many gambling companies are using this, it is clear from current levels of exposure reported in this research that this could be utilised more by gambling companies and potentially this tool should be made available to tipsters and affiliates as well. The social media analysis also found that 16 traditional and 9 eSports accounts stipulated that followers must be over 18, whilst only 7 traditional accounts and a single eSports account prevented us from following the age screening process.

It is clear that more could be done with technology to limit exposure of children, young people and vulnerable adults to gambling advertising online.

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5 Experience of children, young people and vulnerable adults

This chapter draws on the primary qualitative research conducted by Ipsos MORI and ScotCen to explore the everyday experience of being exposed to gambling advertising and marketing. This included in-depth diary work with 28 children and young people (aged 11-24) and 32 vulnerable adults, and a further 10 focus groups with children and young people aged 11-24 (n=62), and 3 focus groups and 4 interviews with vulnerable adults (n=21).

5.1 Key findings

- Participants reported what they perceived to be high levels of exposure to gambling advertising and marketing, and spoke of the ubiquitous nature of gambling advertising across multiple formats. The most common channels of exposure were identified as TV, social media and the high street – including inside and outside shops, billboards and presence of gambling venues.
- Exposure doesn't always mean engagement, but there was a broader awareness among participants that adverts can have a wider impact on attitudes and beliefs.
- The sheer volume of advertising and marketing contributed to a sense of normalisation of gambling within wider society.
- Participants reported mixed understanding of risk, and felt more could be done to emphasise risks of gambling over sense of enjoyment and fun.
- Children, young people and vulnerable adults were attracted to a wide variety of themes and features within advertising, the appeal of which is not always exclusive to these groups alone.
- Advertising was not the only form of exposure to gambling among children, young people and vulnerable adults. Levels of exposure to gambling activities, and to advertising, was also driven by a range of contextual factors including family, friends, interests and habits.

5.2 Gambling advertising in context

5.2.1 Awareness of gambling was also driven by marketing, 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 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 fund raising events. As such, awareness of the different types of gambling activity and brands was closely linked to the behaviour of family and friends.

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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[71]

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.

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.

Finally, gambling was closely related to sports routines and interests. Awareness of, exposure to and participation in gambling activity increased around watching or attending matches. Many participants felt gambling marketing was omnipresent in sport, particularly within football, including sponsorships of teams, in stadiums and surrounding the pitch. For some, 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. 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.

[71] The quotes used in this chapter 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.

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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 smoking.

They advertise everywhere, on the side of football stadiums, on the sides of the rings, everywhere. Anywhere there's a sports sign there's a betting sign. 100% guaranteed.
Young person, aged 16-17

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

5.2.2 Participants noted availability and immediacy of online gambling

Participants acknowledged the ubiquitous nature of gambling in the world around them, citing the number of betting shops on their high streets and the prompt to purchase scratchcards at the point of purchase. 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 given participation is no longer restricted to the opening hours of casinos, bingo halls and betting shops. In this sense, participants 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 attract gambling activity that would not have otherwise taken place offline.

It's literally like there [are] scratchcards and lottery places in almost every supermarket shop.
Young person, aged 15-18

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

5.3 Reported exposure to gambling advertising and marketing

5.3.1 Most participants reported high levels of exposure to gambling advertising and marketing

Participants from across the two research projects, including those not interested in gambling, found it easy to discuss gambling brands and advertising. 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. Exposure to gambling advertising and marketing was further evident within the brand recognition exercise, where participants were often surprised at how well they were able to identify gambling brands from only a snippet of a logo.

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

Within the Ipsos MORI research, participants were asked to share examples of gambling advertising that caught their attention as part of a two-week diary exercise. Most were surprised at their level of exposure during the task, noticing new forms of digital advertising and forms of marketing they hadn't previously acknowledged as advertising. However, given the high profile nature of the policy concern reported in the media, some were surprised not to see more gambling advertising during the diary task.

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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 thought I'd see a lot more to be honest... I found there were a lot less adverts than I thought I'd see, especially on social media. I suppose it depends on what I search on the internet.
Female, 24, Rhyl, Infrequent gambler

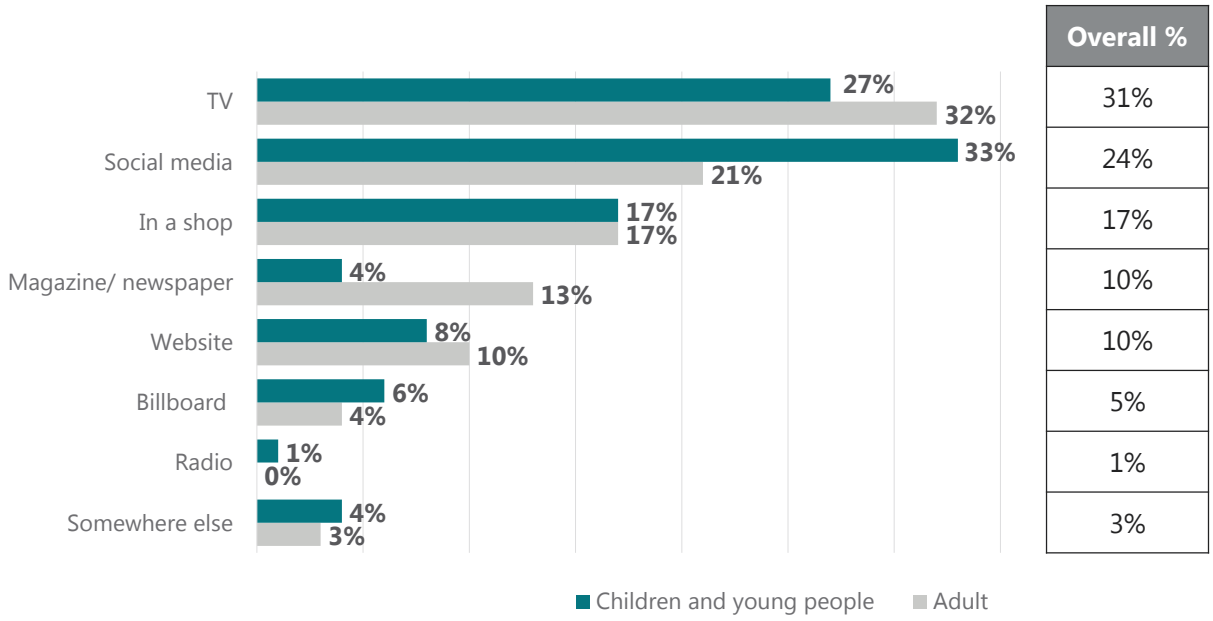
ScotCen Brand Recognition Exercise

- Participants in focus groups with young people and adults with mental health problems were invited to take part in a brand recognition exercise where they were shown small sections of the logos of 9 gambling brands and asked to identify them[72].
- Across the groups, participants correctly identified between 6-9 of the logos, with an average of 8 logos.
- As participants in a number of groups had indicated that they did not know many, if any, gambling brand logos, they tended to be surprised that they were able to identify the gambling brands from only a snippet of a logo.

5.3.2 TV and social media were the most common sources of advertising

Participants recalled seeing gambling advertising and marketing throughout the day. The most common sources of exposure to gambling advertising and marketing were TV and social media, followed by shops. This was apparent in both the diary task (as shown in Figure 5.1) and in round table discussion within the focus groups.

Figure 5.1: % of gambling adverts captured by participant diary over two-week period



Source: Ipsos MORI, based on 142 mobile app responses from CYP and 320 responses from adults

Exposure to gambling marketing and advertising on **television** was mentioned frequently across all focus groups and interviews; however, this was not restricted to the viewing of live sports matches. Participants also shared examples of gambling advertising whilst watching other genres on demand/catch up, and the sponsorship of daytime TV programmes

[72] The exercise was taken from Fast Forward's, Gambling Education Toolkit (www.fastforward.org.uk/gamblingtoolkit) and included the brands: Coral, The Big Lottery, Bet365, Ladbrokes, William Hill, Betfred, Foxy, Bingo, Paddy Power and SkyBet.

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such as Jeremy Kyle, The Chase, I'm a Celebrity, Celebrity Big Brother and Home and Away. 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.

Gambling advertising on social media was noted more by young people than vulnerable adults, but remained 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 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 casino 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.

5.3.3 Exposure didn't guarantee engagement, but did add weight to legitimacy of gambling

It is important to note that children and young people across the age range (11-24) typically said that they were uninterested in many examples of gambling marketing. This ranged from those who were reacting to the perceived ubiquitous nature of the advertising, to those who stated that they were barely aware of the gambling marketing. 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 felt that it wasn't relevant to them. As such, there was limited evidence of gambling activity, particularly among young people, being prompted by advertising or marketing.

> ***I've seen adverts like that all the time, and again and again, and it's just so repetitive and monotonous.***
> *Young Person, 15-18*

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However, participants also recognised that adverts were likely to have a wider impact, beyond instigating instant gambling action. For example, gambling adverts were said to be so commonplace that they had become an accepted and normal part of viewing programmes on television or being online, adding to the notion that gambling had become popularised and mainstream. Even if individuals were thought to be able to ignore these adverts, participants also noted that it was difficult to ignore them, and the brands, completely.

> ***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*

> ***I don't think you really recognise them, your subconscious takes it in, you don't consciously look at it and be like 'oh there's a betting thing up there'.***
> *Young Person, aged 16-17*

Furthermore, for higher frequency gamblers, the perceived high levels of gambling advertising provided an endorsement of their behaviours. For example, a participant who had recently come to live in the UK pointed to the extent of gambling advertising to support his view that gambling was socially acceptable here. Another high risk gambling participant hoped that the extent and diversity of gambling advertising would help to convince his family and friends that gambling is acceptable and mainstream, as explored in the Pen Portrait below.

Pen Portrait - 35, Male, London, Gambles for Money, High Risk

- Sports fan, engages in a range of gambling, 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 involved a tie-in with a mainstream brand would work to convince his girlfriend that gambling is OK.

5.3.4 Messages of risk and messages to gamble responsibly received mixed levels of exposure and understanding

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. However, many under 16s 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*

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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 to sometimes portray 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

5.4 Themes and features that attract attention

5.4.1 Children, young people and vulnerable adults were attracted to a wide variety of 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 are wider than the use of visual images and colours, or reference to specific child friendly terms, and include reference to the wider framing of the gamble, such as emphasis on fun or financial offers.

Many of these themes and features were felt 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 were more attracted to gambling advertising that used bright and engaging colours. This was evident on TV, on 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

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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 where 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 difficulty. 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.

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6 Analysis of advert content, tone, and format

This chapter draws on the content analysis conducted by the University of Stirling and University of Bristol. The University of Stirling analysis focused on of a sample of 300 paid-for adverts from March 2018, and the University of Bristol analysis considered 800 Twitter posts collected by Demos as part of their social media research from March and November 2018. As outlined in the method overview below, it is important to note that reference to current regulation is for guidance only and is not intended to be used as a judgment on whether any individual issues of potential compliance would be upheld or not.

6.1 Key findings

- 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 presence of other themes and features that had been identified in qualitative research as having wider appeal to children, young people, vulnerable adults and others. For example, the use of humour and celebrities was found to feature more often than the promotion of winners or the use of glamour.
- There was widespread use of financial incentives, to which children, young people and vulnerable adults may be susceptible. 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.
- The content analysis identified some evidence of reference to frequent gambling or sense of urgency. This often related to sporting events, including within eSports where event based advertising also encouraged late night betting.
- 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 or 'responsible gambling' was low. Most creatives were judged to have poor visibility in this regard.

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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 complimentary pieces of content analysis:

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

- This used a sample of 300 creatives across eight forms of paid-for advertising, captured by Ebiquity's media monitoring programme.
- Samples were 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.
- The 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. 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. 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 assessment of design features, topical associations, and messages about gambling behaviours or outcomes. 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. This included a codebook informed by previously published research, piloting, inter-coder reliability tests, and regular feedback meetings between coders. Inter-coder agreement across the two projects was measured at 99% within the Full Media Deep Dive and 94% within the Twitter Deep Dive.

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.

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6.2 Evidence of some appeal to children and vulnerable adults

6.2.1 Limited evidence of content or features that may appeal directly to children, and young people

The primary qualitative research with children and young people pointed to examples of features that would directly appeal to children and young people over other groups; this included the use of colours and characters, and emphasis on fun or enjoyment. There is significant overlap here with the CAP code which forbids content that may have 'particular appeal' to those aged under 18.[73] Researchers found some evidence of such appeal in both sets of content analysis.

Within the Full Media Deep Dive, features that may appeal directly to children and young people mostly included one of three features: 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 creatives. A similar distinction was made within the Twitter Deep Dive (defined as having a 'regulatory issue concerning children'); however, the prevalence was higher within this dataset. Researchers at Bristol found that 21% of Traditional Betting Tweets, 59% of eSports Betting Tweets, and 37% of eSports Content Marketing Tweets contained direct appeal 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.

The CAP Code (which is enforced by ASA) specifically prevents the use of images of anyone under the aged of 25 playing a significant role in marketing communications for gambling ads.[74] For example, a 2015 ruling by the ASA disallowed the use of Jordan Spieth (US golfer at the time aged 21) in Twitter adverts from Coral, Bet365 and Totesport accounts.[75] Among the adverts identified as plausibly appealing directly to children and young people, the content analysis found examples of adverts that contained individuals under the age of 25. In total, eight percent of creatives within the Full Media Deep Dive contained individuals estimated to be under 25.

A similarly low percentage of ads featuring individuals under 25 was found within the Traditional Betting Tweets (four per cent) and eSports Betting Tweets (six per cent); however, this was more prominent in eSports Content Marketing Tweets, where the figure rose to 24%. The prominence within eSports Content Marketing Tweets was often due to featured players – many of whom are verifiably aged 24 or less. eSports Twitter operators also used children and babies in gifs, memes and other visual content.

[73] ASA, 'Avoiding taking a gamble with particular appeal', https://www.asa.org.uk/news/avoiding-taking-a-gamble-with-particular-appeal.html
[74] However, it should be noted that individuals who are, or seem to be, under 25 years old (18-24 years old) may be featured playing a significant role only in marketing communications that appear in a place where a bet can be placed directly through a transactional facility; for instance, a gambling operator's premises or on their own website.
[75] ASA, 'A Speith of gambling rules under 25s and social media', https://www.asa.org.uk/news/a-spieth-of-gambling-rulings-under-25s-and-social-media.html

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

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

The qualitative research highlighted that children, young people and vulnerable adults are attracted to a wide variety of features within gambling advertising, but that the appeal of these advertising characteristics is not likely to be unique to this cohort. This includes the use of humour, glamour, celebrities and personalisation.

- The most prominent of these features was the use of humour within the Twitter dataset identified as content marketing. Researchers found that 75% of the Traditional Content Marketing Tweets, and 36% of the eSports Content Marketing Tweets used humour. Humorous content on Twitter was also found to secure the most engagement with users. 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. Humour was less of a feature within the Full Media Deep Dive, contained in only 12% of adverts.

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- Another prominent feature that was found in the qualitative research to have some appeal to children and young people is the attempt to **personalise** 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, which implied that the advert was aimed specifically at the individual audience member or that the gamble (or associated winnings) belonged to them. For example, an advert from Betfred suggested 'double or treble your first goalscorer odds if your player scores a second or third goal', and an advert from the Health Lottery stated 'we guarantee you £10,000'.

- The presence or endorsement of **celebrities** was also apparent across the datasets. 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 most frequently sport stars. In five per cent of cases, a celebrity was directly tagged within the post, which would likely add a greater sense of endorsement and approval compared to other adverts which only featured images of celebrities.

- Presentation of **winners**, including testimonials, was a less prominent feature, identified in seven per cent of the Full Media Deep Dive. This was most apparent in adverts for lotteries, including references to areas that were collective winners, or individuals receiving the jackpot.

- Few ads were judged as **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. Examples included offering 'an exclusive betting experience', connotations of grand, decadent or desirable status, use of language associated with glamour, and characters dressed in smart, elaborate or formal clothes.

- Finally, the research identified **memorable songs** as a feature that is likely to appeal to children and young people. 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. Music was used both as a secondary component in the advert, for example as a backing track, and also as a main feature, for example all actors singing a song.

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

6.2.3 Use of enticing financial offers is a common feature of gambling advertising; these features are 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"[76]. 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.

It should be noted that there are already a number of relevant provisions contained within the CAP code and associated guidance to discourage the trivialisation of gambling or placing undue emphasis on money motives for gambling, and to encourage caution when encouraging people to take advantage of promotions to open accounts. However, researchers found widespread use of financial offers that they believed could be construed to be in breach of these parts of the code.

- Almost half (44%) of the creatives within the Full Media Deep Dive referred to a free or matched bet. These included offers as an incentive to play or to register an account, offers in which winnings from other bonuses could be paid as a free bet, and offers that presented free or matched bets as an opportunity to minimise risk. For example, *'£30 free bet when you register today'*. This feature was also apparent within the Twitter Deep Dive; within which Demos used machine learning and natural language process to identify that across the full dataset, 47% of all Tweets contained reference to a free or matched bet.

[76] Pitt H, Thomas SL, Bestman A, Daube M, Derevensky J. What do children observe and learn from televised sports betting advertisements? A qualitative study among Australian children. 2017; 41(6): 604-10.

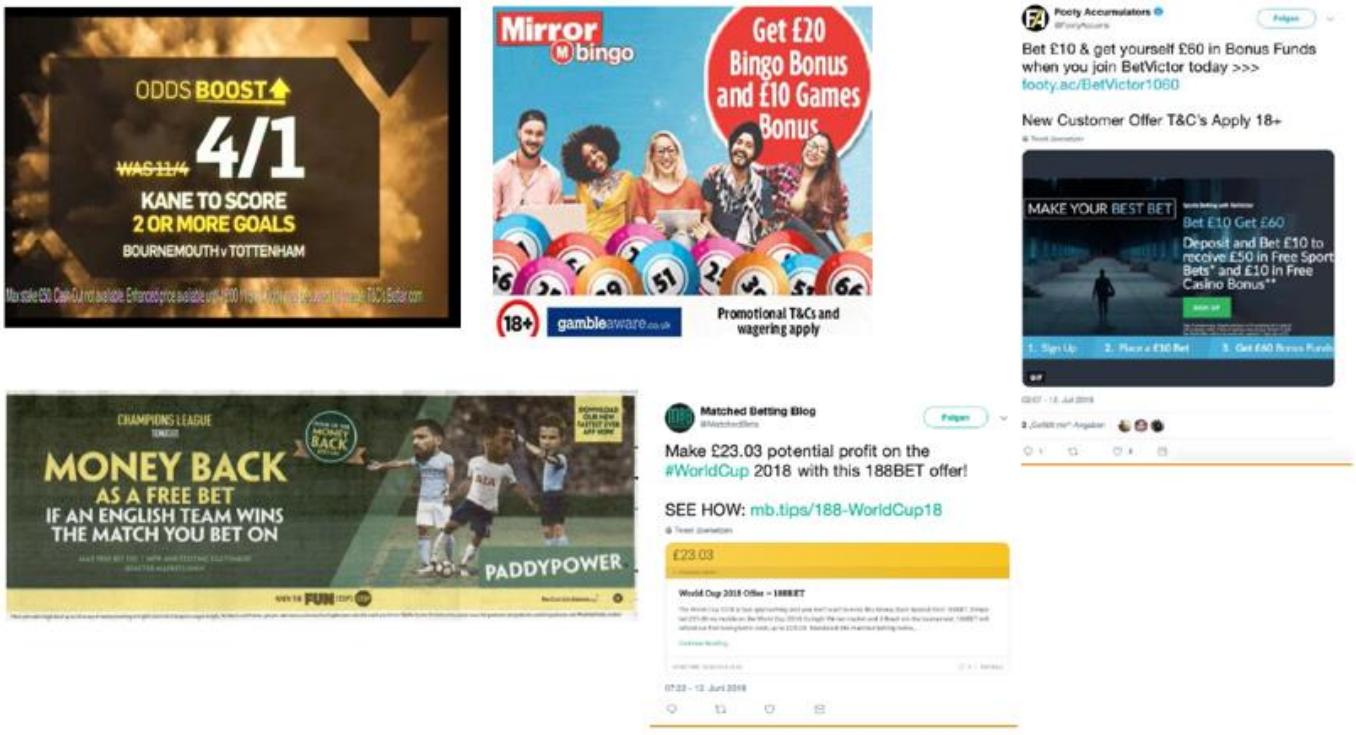
- Another common feature with the Full Media Deep Dive was the used of price offers and bonuses available to all customers, which featured in 41% of creatives. This included references to enhanced odds or suggestions that the chances of winning had – at least partly – been extended. Such as '*Odds boost. Was 8/1, now 12/1, Salah and Sanchez both to score'*. Further examples include promoting enhanced winnings on particular bets, such as '*double your winnings if your horse wins'*.

- The Full Media Deep Dive also identified that 27% of adverts referred to a means of minimising risk. A common feature was to reassure customers that they could get their money back as a free bet if their bet was unsuccessful. For example, '*Money back as a free bet if your horse falls in any Sandown race today'*.

- 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'.

- Furthermore, researchers at University of Bristol 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'* or others which point to a potential welcome bonus.

Figure 6.3: Examples of adverts with financial incentives, to which children, young people and vulnerable adults are particularly susceptible



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6.3 Evidence of wider concerns in relation to susceptibility of children, young people and vulnerable adults

6.3.1 Tweets are seldom labelled as advertising

CAP Code 2.1 states that 'marketing communications must be obviously identifiable as such'. This presents a new challenge within social media. The ASA has published additional guidance on the recognition of ads within social media, and discusses the particular challenge of advertorial content over sponsored or paid for posts.[77] Researchers at the University of Bristol found that none of the 800 Tweets analysed manually within the Twitter Deep Dive contained clear labelling that identified adverts as such. However, it should be noted that 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, the recognition of gambling advertising presents a significant issue on Twitter where there is a wide variety of authors (beyond major recognised brands), and where content published by gambling brands doesn't always specify or encourage a specific gambling behaviour, but instead seeks to build brand awareness and loyalty through engaging users in discussion of hot topics. Furthermore, this is further complicated on platforms such as Twitter where the relationships between gambling brands, affiliates and independent tipsters is not always apparent. As such, 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.

6.3.2 Some evidence of encouraging frequent gambling or creating a sense of urgency

Guidance published by ASA in February 2018 noted gambling on a regular, repeated or normalised basis should not be encouraged, nor should advertising encourage people to gamble more than they would otherwise, or with an inappropriate sense of urgency. Across the content analysis, there was evidence of adverts that presented gambling as a normal or regular activity, and examples of time limited opportunities.

- The most prominent feature evident within the content analysis was the use of time limited gambles or offers. Over three-quarters (77%) of creatives within the Full Media Deep Dive contained this feature, which may be interpreted as creating a sense of immediacy and urgency, and encouraging instant action by the consumer. This was in part driven by reference to a specific sporting event taking place imminently – for example '*Bet on Cheltenham today and get up to £50 as a free matched bet.*' Some general price offers and bonuses (not tied to specific events) were also suggested to be time-limited, for example *'£30 free bet when you register today'*; moreover, lottery adverts also suggested that playing and winning opportunities were linked to specific days.

- Event based advertising was also a common feature within eSports advertising on Twitter. For example, '*Fantastic Match – Fnatic vs OpTic Gaming Watch this game and bet on X-Bet.co*'. Linked to this, the Twitter Deep Dive found that 17% of eSports Betting Tweets encouraged betting late at night or in the early hours, often as a result of tournaments in USA, China and South Korea.

- Only four adverts within the Full Media Deep Dive (1% of the total sample) were judged to plausibly involve some degree of socially irresponsible or excessive gambling. However, a more prevalent feature was to reference normal, frequent or daily behaviour; this was found in 33% of creatives from the Full Media Deep Dive. This included references to gambling 'everyday' and that gambling could take place over an extended period. Also examples included reference to offers and bonuses recurring regularly and that lottery draws took place regularly.

[77] https://www.asa.org.uk/advice-online/recognising-ads-social-media.html

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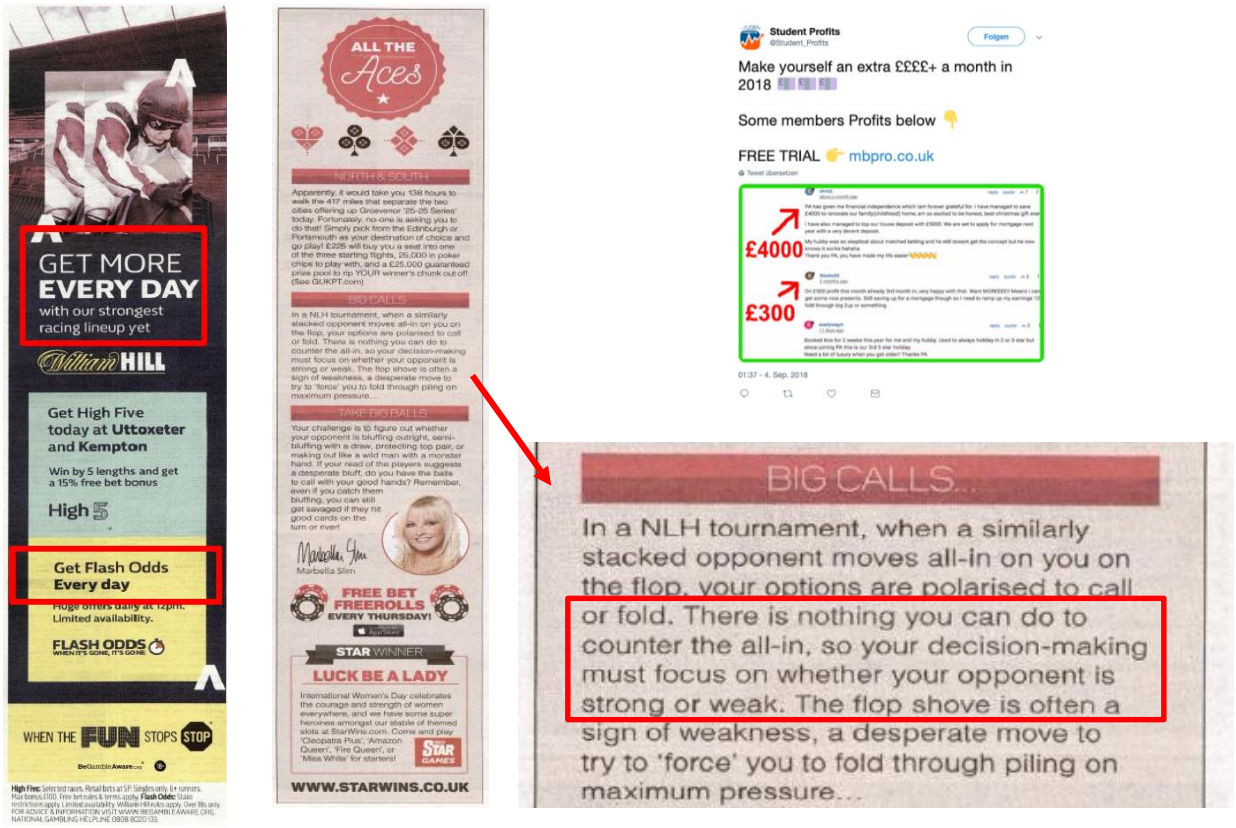
Figure 6.4: Evidence of ads that create a sense of urgency



6.3.3 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 a 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 of lack of knowledge of children, young people or vulnerable adults. These were:

1. 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.

2. Overly complicated or potentially misleading presentation of gambles and offers – for example using acronyms or technical terms, or presenting eye-catching bets or offers but with extensive criteria or terms and conditions.

3. Inflated suggestions of winning – for example implying that someone had already won, such as 'we guarantee you £10,000'.

4. 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', or another advert which promoted access to a bonus 'as easy as 1-2-3'.

In total, 22% of creatives within the Full Media Deep Dive were identified as containing at least one of these features. Furthermore, in an analysis of the amount of information presented within the advert, they noted that on average the

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creatives within the Full Media Deep Dive contained 3.94 pieces of information about the gamble and associated offers, with 36% containing five or more.

Researchers at the University of Bristol developed a similar definition, and found that 37% of Traditional Betting Tweets could potentially exploit the susceptibility or inexperience of young or vulnerable people. This was mainly due to financial incentives that were complex to understand or were unrealistic. 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,[78] yet, the short form of Tweets presents a particularly challenge here, as explanations are necessarily curtailed and therefore are particularly prone to a lack of clarity.

Figure 6.5: Evidence of ads that may plausibly exploit the susceptibilities of children, young people and vulnerable adults

6.3.4 Little evidence of prominent consumer protection messages

In the primary qualitative research, there were calls from across participant groups for greater emphasis on the risks of gambling to be placed within advertising.

With this in mind, the Full Media Deep Dive found poor presentation of age warnings, risks or terms. Table 6.1 shows that in 14% of cases there were no age warning messages present, 14% where there was no reference to messages that promote lower risk gambling (e.g. begambleaware.org), and support and 11% with no terms and conditions (where these should have been present). Examples of this messaging are shown in Figure 6.6 below. The sport sponsorship analysis also found few examples of age restriction and messages that promoted lower risk gambling; where included, these were

[78] https://www.gov.uk/cma-cases/online-gambling?cachebust=1517389428

normally in commercial breaks or sponsorship lead ins. In boxing, rugby and televised football, 3% or fewer of the gambling references recorded had a message promoting lower risk gambling or an age restriction message.

Table 6.1: Codebook section four: Visibility of consumer protection messages

Ethical practice feature[79]	*n*	%
Age warning messages		
None present	42	14
Very poor visibility	251	84
Poor visibility	7	2
Acceptable visibility	-	-
Good visibility	-	-
Very good visibility	-	-
Messages that promote lower-risk gambling or signpost to support		
None present	42	14
Very poor visibility	163	54
Poor visibility	90	30
Acceptable visibility	4	1
Good visibility	-	-
Very good visibility	1	<1
Terms and conditions[80]		
None present	31	11
Very poor visibility	207	73
Poor visibility	30	11
Acceptable visibility	5	2
Good visibility	7	3
Very good visibility	5	2
Not applicable[81]	15	-

[79] Very poor visibility (<10% of advertising space); Poor visibility (11-15% of space); Acceptable visibility (16-20% of space); Good visibility (21-25% of space); Very good visibility (>26% of space).

[80] Percentages reported are valid, i.e. excluding advertising for which no T&Cs were applicable (i.e. no bet presented).

[81] Not applicable = No specific gamble presented in the advertising (i.e. only about the brand) and thus no terms and conditions applicable.

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Figure 6.6: Examples of poor visibility of consumer protection messages

The Twitter analysis found a similarly poor level of referencing to consumer protection messages. As shown in Table 6.2, only 7.3% of Tweets from betting accounts referenced either Terms and Conditions or messages that promoted lower-risk gambling within the text. 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 feed, as only the first part of a post will be seen initially). The Twitter Deep Dive content analysis also showed that 31% of traditional accounts did not exercise caution in this regard.

Table 6.2: Number and % of Tweets mentioning each type of condition warning messages within the body of text

	Tweets from gambling related accounts	% of all Tweets
All Tweets	888,745	100.0%
Any warning message	64,573	7.3%
Terms and conditions	39,697	4.5%
Responsibility	36,301	4.1%
Age restriction	769	0.1%

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7 Conclusions and recommendations

This chapter presents some early conclusions in response to the key research questions of the study. A full, Final Synthesis Report will be published in due course.

7.1 Conclusions from interim synthesis analysis

7.1.1 Where and how often does gambling advertising occur?

The media monitoring indicates that overall, the volume and spend on gambling advertising and marketing has increased in recent years. Although there are signs that this is cooling in some sectors and channels (for example the ASA found that exposure to children on TV had decreased since 2013)[82], it is also apparent that the media monitoring is likely to be an underestimate of the volume of gambling advertising and marketing. This is due to the exclusion of 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, as well as sponsorship of sports teams and leagues, and within sports live TV coverage.

The qualitative research with children, young people and vulnerable adults spoke of the ubiquitous nature of exposure to gambling advertising and marketing, at all times of the day. This includes marketing that is more difficult to capture, such as window adverts in gambling premises and scratchcard or lottery facilities at the point of sale in shops, as well as sponsorship of sports teams, leagues and within live TV coverage. The presence of gambling advertising throughout the day was further evident in the media monitoring across TV, radio and Twitter.

Sport is an important context in which exposure to gambling advertising is likely to occur. This was demonstrated by spikes in spend and social media activity across key sporting events (such as Cheltenham Gold Cup and the World Cup), by the compounded rate of exposure whilst watching live sporting events on TV, and by the prevalence of sports/event betting as the most common form of online advertising within the avatars' research. However, this association was not universal across all sports – for example, the sports sponsorship analysis found very few references to gambling within live broadcasting of rugby and tennis matches, and no references within Formula 1. Moreover, outside of advertising online, sports and event betting has a smaller profile than the advertising of lotteries. Lottery advertising (including the National Lottery, Postcode Lottery, Health Lottery), is particularly prominent on TV, radio, cinema, door drops and outdoor media.

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

The content analysis demonstrated the wide variety of themes and features used to market gambling. This included adverts 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 are the best players in the league)..

Within those ads designed 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).

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 sporting topical debates. Other common features included the use of humour (especially within 'content marketing') and celebrity endorsement. It was less common to advertise jackpots and potential prizes, or feature previous winners or testimonials.

[82] https://www.asa.org.uk/resource/children-s-exposure-to-age-restricted-tv-ads.html

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7.1.3 What are children, young people and vulnerable adults particularly susceptible to?

The wide range of themes and features identified by participants in the qualitative research illustrates the challenge in categorising advertising or marketing as having 'particular appeal' to one group over another.

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 appeal in this way, 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 other features that are not unique to them. For example, the use of humour, financial incentives, and the presentation of winners.

Moreover, whilst the qualitative research succeeded in presenting the breadth of appeal, it is difficult to generalise across participant groups. It was clear from discussions with participants that advertising and marketing works cumulatively on a number of different levels, and therefore it is difficult to separate the attraction of specific themes and features from different categories or calls to action. What may work for one person in a particular setting may be less relevant or appealing to others in the same cohort, or if any single feature is removed or replaced.

Appeal cannot therefore realistically be defined in a simplistic binary 'does appeal to young people' or 'does not appeal to young people' fashion, 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.

Beyond appeal i.e. the themes and features that capture initial attention to gambling advertising, it is also important to consider potential susceptibility of children, young people and vulnerable adults to these themes and features. The content analysis identified three areas of wider concern in this regard: i) difficulty of distinguishing advertising from content on Twitter, and the extent to which children and young people will be able to identify which content is designed to influence their attitudes and behaviours in favour of gambling; ii) a lack of emphasis on the risks of gambling and of messages of responsible gambling; and iii) the lack of ability in children, young people and vulnerable adults to understand the risks involved in cases with complex terms or where reduced risk or free bets/spins are promoted.

7.1.4 To what extent are children, young people and vulnerable groups exposed to gambling advertising, and what is the impact?

Participants spoke of the ubiquitous nature of gambling advertising, across multiple formats throughout the day. Qualitative research identified TV, social media and the high street as the main sources of exposure to gambling advertising (the quantification of which will be explored in a forthcoming survey). Although participants claimed to be good at ignoring gambling advertising content (particularly those under 18, who felt it wasn't relevant to them), the strong performance of all participant groups in the brand recognition task conducted by ScotCen is early evidence of the impact of exposure in building awareness of gambling.

However, advertising isn't the only source 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.

It is too early to judge the impact of gambling advertising and marketing on children, young people and vulnerable adults within this report. While the interim synthesis report is able to comment on exposure to gambling advertising, the key features that are likely to appeal to children, young people and vulnerable adults, and the prevalence of these within gambling advertising, this has not yet been triangulated alongside evidence of impact. This will be the focus of the full, Final Synthesis Report, integrating the findings of the survey of children and young people.

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At this stage, however, it is worth considering the complex nature of potential impact. The primary qualitative research found limited evidence of individual ads prompting gambling behaviour that hadn't already been intended or considered by participants. Perhaps this should not be a surprise, given that only 51% of creatives sampled for the Full Media Deep Dive included a specific call to action. Advertising is more nuanced than this. Vakratas and Amber (1999) set out a taxonomy of how advertising works, noting that sometimes (though not very often) the objective of an advert is to elicit direct or sometimes immediate purchase or action. However, they conclude that much more often the impact is indirect with the advertising intentionally having an effect on beliefs and emotions, which may or may not in time lead to action by the consumer.

The primary qualitative research did present some early findings in this regard, noting that exposure to the sheer volume of advertising and marketing led to perceptions of normalisation and, in time, legitimisation. These, more complex, relationships between advertising and emotions, beliefs and attitudes towards gambling will be explored further in the full synthesis report.

7.1.5 To what extent are children, young people and vulnerable groups exposed to gambling advertising online?

The online avatar research found no evidence of gambling adverts appearing on popular children's sites; the most prominent placement of gambling adverts was found on sites such as Oddschecker which are highly unlikely to be visited by children and young people.

However, this excludes potential exposure to adverts on social media, which was one of the most commonly cited sources in the qualitative research. Moreover, research by Centre for Analysis of Social Media at Demos estimated that 410,000 UK followers of gambling related accounts were likely to be under 16. This suggests that a portion of children are actively engaging with, rather than inadvertently aware of, gambling advertising content online.

The research identified two possible ways to further mitigate the risk of exposure to gambling advertising among children and young people: i) better use of adtech to positively exclude online browsing profiles that present themselves as being very likely to be a child; ii) working closely with social media platforms such as Twitter to make better use of age verification tools before being allowed to follow accounts that promote gambling.

7.1.6 Other notable conclusions

Researchers identified three further notable observations from the project.

- Although sport is not identified as a feature that would likely have 'particular appeal' to these audiences, the research suggests it would be much harder to avoid gambling advertising if you were a sports fan who was also a child or young person, particularly a football fan. This was reflected in the emphasis of placement of ads on sports focused websites within the avatar research, and within the sports sponsorship analysis.

- eSports betting accounts on Twitter appeared to be an immature gambling advertising sector, where researchers identified a number of areas where content could plausibly be contravening current GB guidelines included very limited reference to the risks of gambling. However, authors further note that many accounts relating to eSports are likely to be unlicensed gambling operators within Britain, that they may not be directly targeting a British audience, and in some cases it is not possible for British citizens to place a bet through these operators. This warrants further clarification and research.

- Across the qualitative research, there was a wider call from participants for more messages which emphasised the risks of gambling, or promoted more responsible gambling behaviour.

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7.2 Recommendations from interim synthesis analysis

Based on the context of these findings, Ipsos MORI has identified 12 recommendations that warrant further consideration among industry, regulators and researchers. Further recommendations relating to impact and exposure will be considered within the Full Synthesis Report.

7.2.1 Recommendations for gambling, advertising and tech industry

1. Explore making better use of technology to minimise the risk of exposure of gambling advertising content to children, young people and vulnerable adults. This could include using adtech to positively exclude certain online profiles from seeing gambling ads (including those with 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.

2. Integrate more explicit and more frequent references to risk and responsible gambling within advertising and consider the visibility of warnings within advertising content. This signposting could include dedicating more visual presence to messages about responsible gambling within current ads; increasing the clarity of risk where it is likely some groups may misunderstand financial incentives; being cautious not to over-emphasise elements of fun and enjoyment; and ensuring that clear age restrictions are evident where appropriate.

7.2.2 Recommendations for policy and regulation

3. Establish where issues identified within the research are due to poor compliance with existing regulations and guidelines, or where there may be a need for further guidance from regulators, or new regulations. Regulatory issues identified for attention include the use of individuals under 25 in gambling adverts, labelling of ads on social media, the prominence of consumer protection messages, and determining whether financial incentives are presented clearly enough for users to understand, so that they don't exploit credulity or lack of understanding among children, young people and vulnerable adults.

4. Consider whether 'particular appeal' remains a useful tool as the main criterion for protecting children and young people from the potentially harmful impacts of gambling advertising, given that more general content may appeal to those groups too. Regulators could consider the extent to which features beyond child-friendly images and language are likely to also generate significant interest among these groups – 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.

5. Ensure that existing regulation and codes of practice are applied to the licensed eSports betting market as it develops Where eSports betting operators are licensed 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.

6. 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.

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

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7.2.3 Recommendations for research

8. 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.

9. Establish greater context 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.

10. 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.

11. 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.

12. 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.

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8 Methodology summaries

Strands 7 and 10 are not included in this method summary section as these are in the process of being completed. The methodology of these will be included in the Full Synthesis report.

8.1 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)[83] [84] [85]. 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)[86].

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.

[83] Binde P. 2014. Gambling advertising: A critical research review. 2014.
[84] G. V. Children and Young People's Gambling: Research Review. 2016.
[85] 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.
[86] Binde P. A bibliography of empirical studies on gambling advertising

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8.2 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[87]. 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 8.1 below gives an overview of how the frequency and spend of each media type is generated.

Table 8.1: 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[88] 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.	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[89] data available at the time of booking and the actual station prices derived from the Radio campaign costs. 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[90] report spend data split monthly over a campaign's duration.

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

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

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

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

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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 Outdoor Industry 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 – visiting 1,000 sites in total.	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. This represents an estimate of spend across 1,000 of the most popular sites.
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. A high cost per pack is attributed which may over-inflate the spend in this media, however will be comparable on a like-for-like basis across

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[91]:

- 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.

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

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8.3 Strand 3 – Online 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 in to 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 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 8.2 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 8.2: 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?

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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.

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8.4 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 8.1 and 8.2 below.

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Figure 8.1: Classification pipeline for Tweets sent by 'traditional' accounts

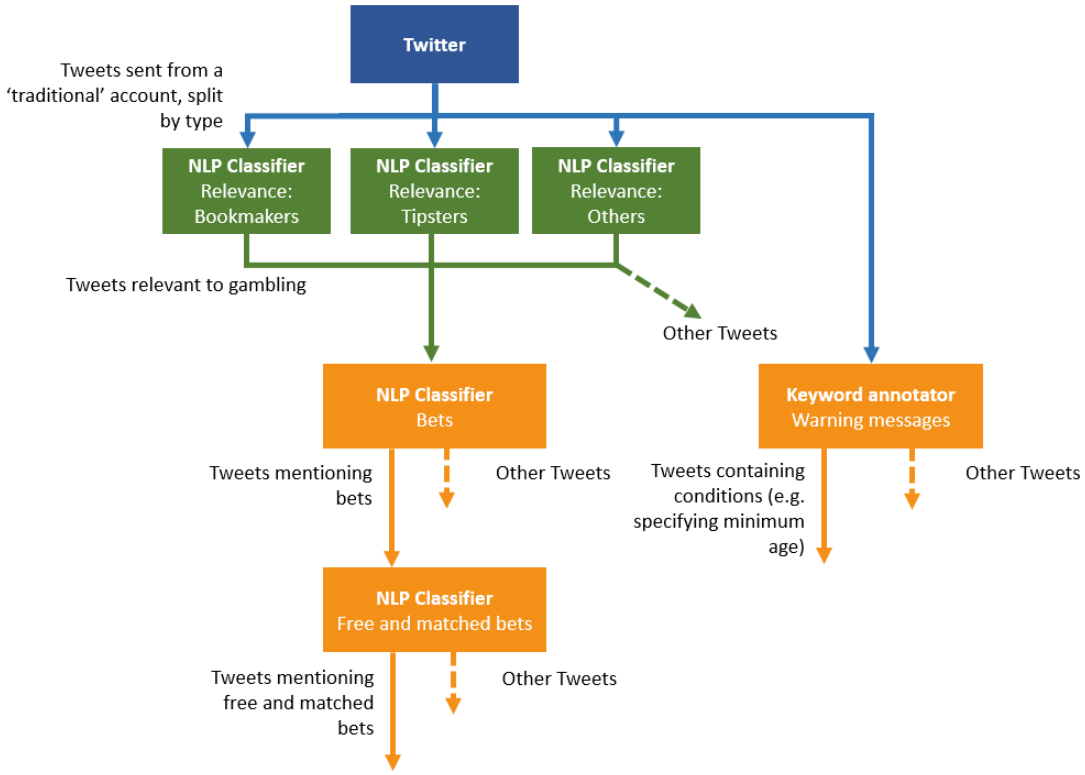
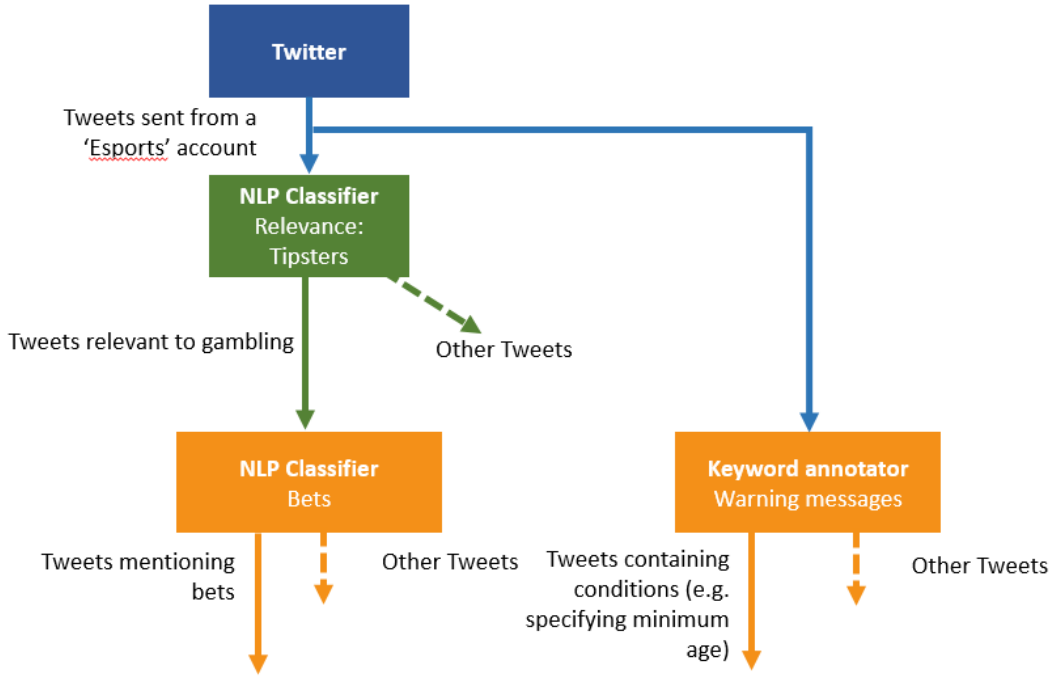


Figure 8.2: Classification pipeline for Tweets sent by 'eSports' accounts



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.

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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 8.3 below.

Table 8.3: 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

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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.

8.5 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.

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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[92]. 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)[93]. 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[94]. The established codebook was discussed and piloted in several sessions by the two coders, before the coding process was started.

8.6 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: The Table 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 8.6). 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

[92] 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.
[93] McHugh ML. Interrater reliability: The kappa statistic. Biochemia Medica, 22(3), 276-282. 2012.
[94] Manning, J., & Kunkel, A. D. (2013). Researching interpersonal relationships: qualitative methods, studies, and analysis. Thousand Oaks: Sage Publications.

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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 8.4: 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[95]
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

8.7 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.

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

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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 8.7 below. A further demographic breakdown of all participants is included in Tables 8.8 and 8.9.

Table 8.5: 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 8.6: 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

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Table 8.7: 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.

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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.

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