



Gambling
Related
Harm APPG

Dame Caroline Dinenage MP
Chair, Culture, Media and Sport Select Committee
House of Commons
London
SW1A 0AA

31 January 2024

Dear Dame Caroline,

Culture, Media and Sport Select Committee on Gambling Regulation

The Gambling Related Harm APPG welcomes the recent report of the Culture, Media and Sport Select Committee on the matter of Gambling Regulation. We thank the Committee for their work in undertaking this assessment of the Government's approach to gambling regulation. We were particularly pleased to see the Committee echo many of the points that have been long raised by the APPG in several key areas, including stake limits, research, prevention and treatment, and the appropriate implementation of the White Paper.

As part of our ongoing inquiry on the proposals of the White Paper, the APPG has undertaken significant efforts to hold the Government to account on the delivery of the White Paper proposals and highlight particular areas of oversight.

On the matter of implementation, we agree with the Committee's recommendation that a detailed timetable of delivery for the White Paper's proposals is of necessity. While the APPG are pleased to see the Government and Gambling Commission proceed with the planned consultations of the White Paper, we regret the lack of clarity around the timeframe of delivery, and the pace of the consultation process, which has served to cause delay in enacting much-needed change.

The APPG particularly welcomed the Committee's work on gambling advertising, which is an area of great interest to the APPG, and a policy area in which the White Paper fell remarkably short in the delivery of proposed changes.

The APPG agrees with the Committee's recommendation to the Government to commission independent longitudinal research to explore the link between gambling advertising and the risk of gambling harms, including specifically for women and children. However, the APPG would stress that there is already a wealth of pre-existing evidence that proves the link between gambling advertisement and harm. Previous research undertaken by the Gambling Commission itself, for example, has found that:

- 34% of British bettors admitted to being influenced by advertising
- 16.3% claimed that ads caused them to increase their gambling
- An additional 13% said ads led them to initially take up gambling¹

¹ <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/understanding-how-consumers-engaged-with-gambling-advertising-in-2020>



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Robust evidence also exists to support action to regulate advertisements based on their capacity to cause potential harm to young people. Researchers at Ipsos Mori and the University of Stirling found that 96% of people aged 11-24 had seen gambling marketing messages in the last month and were more likely to bet as a result.²

Given that clear evidence exists of the relationship between gambling harm and advertising, we would urge the Government to act accordingly under a public health approach, and not rely on the production of any future potential independent longitudinal research before acting. Pre-existing evidence should not be eschewed in favour of an independently commissioned longitudinal study but should serve as the basis for improved regulation whilst longitudinal research is undertaken.

The APPG also agrees that the Government ought to have 'taken a more precautionary approach to gambling advertising in general'. The Government has long rested on the need for a causal link in the existing evidence base to justify meaningful action. This is despite the Minister himself acknowledging that definitively 'drawing a causal link between the level of advertising and problem gambling is exceptionally difficult to do'.³ These difficulties arise as a result of methodological difficulties inherent to gambling advertising research and should not be used to justify further inaction.

Of great concern to the APPG is the Government's continued reliance on models of self-regulation to deliver on the aim of reducing harm. As noted in the Committee's report, self-regulatory efforts like the voluntary front-of-shirt ban will not significantly reduce the volume of gambling messages visible to viewers of top-flight matches.

Despite the introduction of the self-imposed whistle-to-whistle ban, for example, research produced by the University of Bristol's Hub for Gambling Harms Research showed that football matches remain saturated by gambling messaging. A study produced by the Hub in 2023 found that nearly 11,000 gambling messages were identified during the opening weekend of the English Premier League (EPL) across various media channels.⁴ Furthermore, when assessing the frequency of in-game gambling and gambling-like logos in the EPL for the 2022-23 season, researchers found that front-of-shirt gambling logos accounted for only 6.9% of all gambling-associated logos.⁵ Therefore, whilst the voluntary front-of-shirt ban goes some way to reducing advertising, its overall impact is relatively minimal when compared to the wider ecosystem of gambling advertisements in the EPL.

² [The effect of gambling advertising on children, young people and vulnerable adults | Ipsos](#)

³ S. Andrew., Culture, Media and Sport Committee Oral Evidence Session, 5th September 2023, [internet], committees.parliament.uk/oralevidence/13584/pdf/ (accessed 29th January 2024)

⁴ R. Rossi, J. Wheaton, M. Moxey, E. Tozzi., New Season, More Self Regulation, More Marketing, [internet], <https://www.bristol.ac.uk/media-library/sites/business-school/documents/BRISTOL-UNI-GAMBLING-Report2023-2.pdf> (accessed 29th January 2024), p.5

⁵ J. Torrance, et al., Gambling, Cryptocurrency, and Financial Trading App Marketing in English Premier League Football: A Frequency Analysis of In-Game Logos, OSF (2023)



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The APPG also welcomes the Committee's call for the publication of a gambling sponsorship code of conduct from the relevant sporting bodies. The APPG is however conscious of the growing failure of current codes to deliver on the successful reduction of harm. In the case of advertising codes for example, an assessment of gambling messages in the opening weekend of the EPL found that 92% of content marketing ads sent by major gambling brands were not clearly identifiable as advertising, thus breaching codes established by the ASA.⁶

If we cannot hold confidence that current codes are being appropriately applied to tackle inappropriate marketing behaviours within their scope, there is little hope in them effectively regulating future challenges though voluntary codes of conduct co-created by sporting bodies, who stand to benefit from sponsorship of gambling operators.

Therefore, we would urge the Committee to hold the Government to account on the lack of reforms to gambling advertising in the White Paper. Given the clear impact these ads have, and the amount of money the industry spends each year hooking people with them, we feel it would be of great importance for your Committee to push the Government further on this particular issue.

The APPG looks forward to continuing the work of its inquiry, and its continued contributions to the ongoing and forthcoming consultation activity. We welcome the opportunity to work with the Committee to implement effective recommendations and ensure on the timely delivery of the proposals outlined in the White Paper.

Carolyn Harris MP - Chair, APPG for Gambling Related Harm

Sir Iain Duncan Smith MP - Vice-Chair, APPG for Gambling Related Harm

Ronnie Cowan MP - Vice-Chair, APPG for Gambling Related Harm

⁶ R. Rossi, J. Wheaton, M.Moxey, E. Tozzi., New Season, More Self Regulation, More Marketing, [internet], <https://www.bristol.ac.uk/media-library/sites/business-school/documents/BRISTOL-UNI-GAMBLING-Report2023-2.pdf> (accessed 29th January 2024), p.5