

**Written evidence submitted by the
Bristol Hub for Gambling Harms Research, University of Bristol**

University of Bristol led the section on Twitter gambling advertising in [Ipsos MORI's 2020 report on the impact of gambling marketing and advertising on children, young people and vulnerable adults](#).

Our studies into the relationship of social media gambling advertising and young people are published in the report [Biddable Youth](#), an academic paper in the top peer reviewed [Journal of Public Policy and Marketing](#), a policy report called [What are the odds? The Appeal of Gambling Adverts to Children and Young Persons](#), a review paper into [social media gambling adverts and children](#), and a paper highlighting the [issues of esports betting advertising](#) to children.

About us:

Established in 2022, the Bristol Hub for Gambling Harms Research is a community of academics and hub for cutting-edge research relating to gambling harms.

Our ambition is to help prevent and reduce gambling harms by:

- Raising awareness of gambling harms among individuals, communities and organisations
- Strengthening consumer protection against gambling harms in physical and online environment
- Enhancing support and treatment in ways that reflect the complex and interconnected nature of gambling harms.

This response is not confidential and we are willing to be contacted

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We are responding to the following questions:

Q2 What should the key priorities be in the gambling white paper?

Q4 Is it possible for a regulator to stay abreast of innovation in the online sphere?

Q2 - What should the key priorities be in the gambling white paper?

Gambling advertising on social media has spun out of control, and we believe this should be one of key priorities of the white paper. After having conducted various studies (analysing over 888,000 UK Twitter gambling ads alongside the user data of over 1m UK users who engaged with these ads; conducting an online experiment with over 650 participants (including 430 children and young people aged 11-24); collecting physiological data of over

60 children whilst being exposed to social media gambling advertising) we believe that strong interventions by the legislator are required to protect children and young persons from gambling related harm.

We continue by firstly, presenting an overview at the ecosystem of gambling advertising on Twitter, before moving on to highlight some more specific issues with gambling advertising on social media and its effects to children and young persons.

a) The ecosystem of gambling ads on Twitter (see [Rossi et al., 2021](#)):

In 2018 we analysed 890,000 organic ads from 417 accounts along with data on 620,000 followers and 457,000 engagements (replies and retweets) as part of the Ipsos MORI Synthesis Report. We found that:

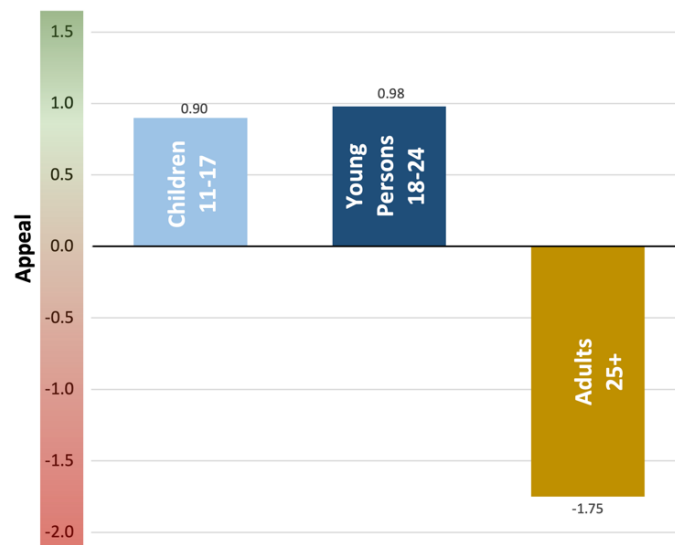
- approximately 41,000 U.K. children (under 16) follow Twitter gambling accounts;
- two-thirds of engagements (likes and retweets) with these ads were made by under 24-year-olds;
- 19% of the analysed ads (102,137) offered 'free bets';
- two-thirds of gambling advertising tweets fail to fully comply with CAP advertising regulations;
- 4.5% of the ads mentioned keywords related to *Terms and Conditions*;
- 4.1% included *Harm Reduction Messages*;
- 0.1% included *Age Restriction Warnings*;
- 80% of the analysed ads included a hyperlink to the bet or the website where a bet can be placed;
- 39.6% (352,406) of the ads were classified as content marketing (a stealth advertising technique), and
- around 9% of were judged by the adult coders as being of 'particular appeal' to children, with additional 22% of ads where the coders were not sure.

b) The appeal of gambling ads to children and young persons (see [Rossi & Nairn, 2021](#))

Since the publication of our initial study that aimed to understand the ecosystem of gambling ads on Twitter, we moved on to investigate whether children and young persons find gambling advertising more appealing than adults. We conducted a cross-sectional online experiment that compared the appeal of real Twitter gambling adverts between 210 Children (11-17), 222 Young Persons (18-24), and 220 Adults (>24). The study was discussed in the House of Lords, and led to some changes in the CAP regulations.

Using an affective pictorial rating scale called SAM (self-assessment manikin), all participants were exposed to 24 gambling adverts from Twitter (both gambling content marketing and conventional gambling advertising) to investigate whether children and young persons had more positive emotions towards these than adults.

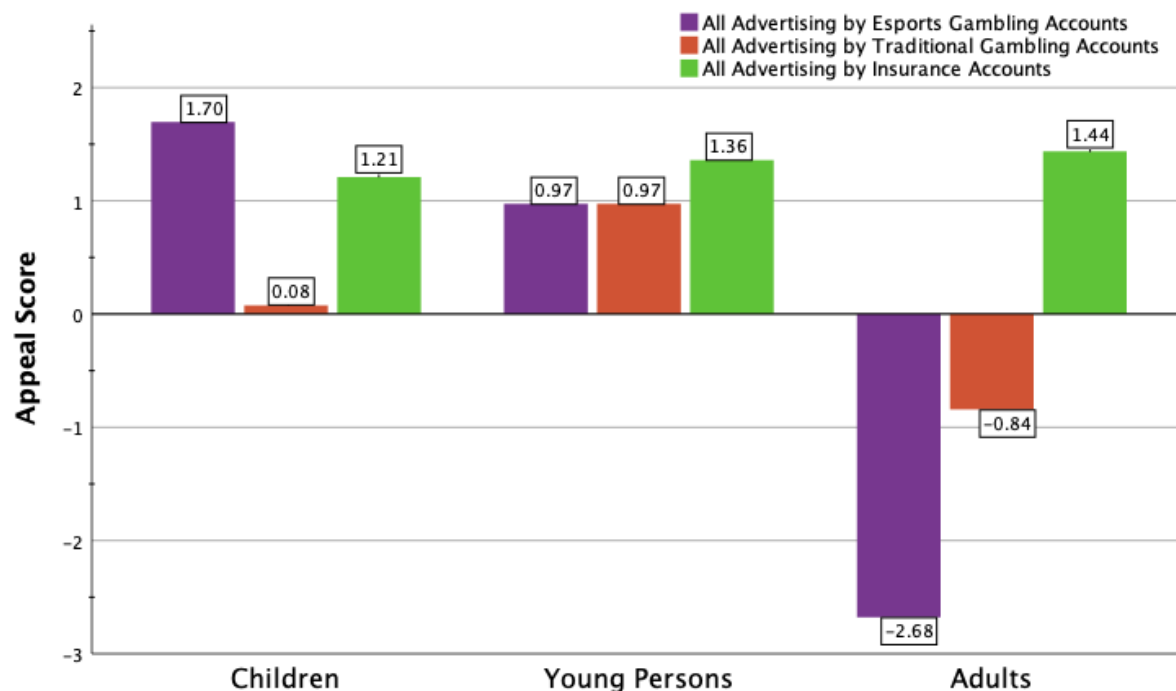
Our results show that both **children (11-17)** and **young persons (18-24)** found gambling ads **more appealing** than adults (>24). The difference was large and highly statistically significant (see bar-chart).



This was true for both content marketing and conventional gambling advertising which. This effect was even stronger for eSports gambling advertising.

We then also tested whether gambling advertising is more appealing than advertising for another product that under 18s do not purchase – ie insurances. **We found that children find eSports gambling advertising significantly more appealing than insurance advertising whereas the reverse is true for adults.**

The bar-chart below shows the average *appeal scores* of gambling advertising by esports accounts and traditional gambling accounts split into children, young persons and adults. This chart summarises how gambling advertising (both by esports and traditional accounts) is significantly more appealing to children and young persons than to adults. Furthermore, **only children and young persons** gave positive average appeal ratings for gambling advertising – whereas adults gave on average **negative appeal ratings**.



Irrespective of the category we investigated (content marketing vs conventional ads; esports vs traditional betting), children we found to have higher appeal scores than adults. This can be seen in the table below (the higher the score, the more positive the emotional response).

Format	Overall Mean	Children	Young Persons	Adults
Content Marketing by Traditional Accounts	2.236	2.391	2.255	2.068
Content Marketing by Esports Accounts	1.845	3.484	2.423	-0.320
Conventional Advertising by Esports Accounts	-1.762	-0.138	-0.553	-4.541
Conventional Advertising by Traditional Accounts	-1.977	-1.987	-0.473	-3.500

c) The Issue of Gambling Content Marketing

Whilst the above applies to the discourse on advertising in general we would like to highlight a specific type of advertising that is little talked about in policy circles but, perhaps like social media influencers, is a new and very powerful advertising technique used prolifically in Twitter gambling advertising and highly effective in getting the attention of young people and children. This is **content marketing**, which is defined as “developing stories that inform and entertain and compel customers to act – without actually telling them to” ([Pulizzi, 2014](#)). These adverts often have no clearly obvious connection to service/product advertised, as they aim to build a positive long-term relationship between the sender and the recipient. Such content marketing adverts often comprise interactive content (such as riddles or polls), news, memes, game previews and insider-driven jokes.

Of the 888,745 organic Tweets [we analysed](#), 39.6% (352,406) were classified as content marketing. While our data was collected throughout 2018, it seems that in the meantime the usage of this technique has further increased. An examination of the most recent adverts posted by major UK licenced gambling providers (e.g. [PaddyPower](#), Bet365, bwin, William Hill, Betfred), show that content marketing posts now form the majority of their social media advertising mix.

Examples of such content marketing posts from GB licenced operators:

- [PaddyPower](#) compares football players laying on the grass after being fouled a The Simpsons character with the headline “Ah! My groin!” ([link](#)).
- [Betway Esports](#) suggest that “Guys literally only want one thing and it’s disgusting..” and then show a picture of a valuable golden “skin” of the esports classic CounterStrike ([link](#)).
- [PaddyPower](#) mocks Liverpool’s football club’s long injury-list by showing a picture of their training session which seems to involve rather dangerous gym equipment (22,000 likes) ([link](#)).
- [Betfred](#) compare the feelings of Arsenal-fans watching a recent match after a key player had to be substituted after an injury with a gif of Pierce Morgan infamously rushing out of his live-morning show , subtitling “Sorry, I can’t do this” ([link](#)).
- [BetVictor](#) used a poll to engage users with their post by asking “Which goalkeeper should be #ThreeLions first choice for #EURO2020?” ([link](#)).

The large-scale use of content marketing by gambling providers can have the following detrimental effects:

Firstly, it further **normalises** gambling as a harmless, normal and fun activity. The normalisation aspect of modern gambling advertising has been pointed out in previous research – mainly in respect to normalising it as a part of sports ([Thomas et al., 2018](#)). However, gambling content marketing appears to take this a step further, as such adverts disguise the potential harm of gambling behind humorous and insider-sentiment driven advertising – as shown in the examples above.

Secondly, we found that most content marketing Tweets are extremely hard to recognize as advertising. **None** of the 381 gambling content marketing Tweets we manually analysed, **had any kind of labelling clarifying their commercial nature.**

Of the 352,406 content marketing Tweets only 657 (0.19%) included any sort of social responsibility message (e.g. *T&C apply, responsible gambling, BeGambleAware*, or indeed age restrictions) – see [Rossi et al., 2021](#). Accordingly, the way in which users process this kind of advertising is likely to be unconscious and the recipient is therefore unlikely to be in a position to make a mental counterargument ([Nairn and Fine, 2008](#)). This is particularly true for children and young persons, who generally struggle to distinguish between commercial and non-commercial communication ([Wilcox et al., 2004](#)). There is a risk that a sub-conscious association is being made between sports/eSports and gambling. This adds more evidence to the concern over the normalizing of gambling as harmless, normal, and fun behaviour.

A fundamental principle of advertising regulations – both by the [International Chamber of Commerce \(ICC\)](#) and the [CAP \(Code 2.1; 2014\)](#) is that advertising must be “obviously identifiable as such”. However, content marketing is per definition hard to recognise as advertising and is propelled by the velocity of social media usage: on average users only spend around 6 seconds per post/advert.

To find whether social media users are able to recognise the commercial nature of such content marketing ads, we recently conducted an online experiment that found that children (11-17) and young persons (18-24) have extremely low advertising recognition skills. **Indeed, children were only able to spot 43% and young persons only 45% of gambling content marketing as advertising. This raises severe concerns about the practise of content marketing.**

Thirdly, content marketing is designed to lure users to engage with the advert (liking, sharing, commenting) – which in turn makes it beyond the control of the sender who sees the advert. For organic posts (non-paid-for adverts) to be able to reach many users they have to be *shared, liked* or *commented* on by the senders own followers. This process works like this:

1. An account holder (e.g. PaddyPower) sends a post (Tweet), which is only visible in the newsfeed of their followers.
2. If these followers engage with the post (comment, share or like), it becomes visible to other users that **do not necessarily** follow the account which originally sent the post.
3. If these users in turn engage with the post, it can expand into entirely new user networks that (previously) had **no relationship** with the initial sender of the post.

The problem with this, however, is that the sender completely loses control and track of who is actually exposed to the adverts. Partly recognising this issue, the [Betting and Gaming Council \(BGC\) recently banned](#) some organic adverts by their members on social media

accounts of football clubs because “organic tweets (...) cannot be solely targeted at over-18s.” Regrettably, this new code **specifically excludes content marketing** from its remit and only includes posts that have “calls to action or links to gambling websites”.

Fourthly, by conducting an online experiment that compared the appeal of real Twitter gambling adverts between 210 Children (11-17), 222 Young Persons (18-24), and 220 Adults (>24), we found that especially gambling content marketing is strongly appealing children and young persons. Indeed, children and young persons were found to have much stronger positive emotions to these gambling ads compared to adults (see [Rossi & Nairn, 2021](#))

Finally, although the CAP/ASA have reacted to some of our criticism about content marketing being outside of their remit, by having broadened their remit, we still think the content marketing regulations are still insufficient in protecting children and young persons. The major issue now is that as indicated earlier, content marketing is very hard to spot, and children and young persons were found to be unable to spot the commercial nature of these – which makes them extremely vulnerable to resultant harm.

We strongly suggest that the review of the act is used to reconsider the status of content marketing. We believe that gambling content marketing should either be banned entirely, or at least be required to be labelled prominently with an advertising warning (e.g. “AD”), similar to influencer marketing, to give users a fair chance to recognise the commercial nature of these ads.

d) Pressure on users

Over 80% of the 800,000 Twitter gambling adverts we analysed included a hyperlink to a bet.

This is particularly problematic for children and young people, since neurobiological development during adolescence increases the influence of emotional, impulsive and affective behaviour ([Pechmann et al. 2005](#)).

This is likely to be further aggravated by late night Tweets offering immediate bets on eSports events. CAP (2018) states that “marketing communications should not unduly pressurise the audience to gamble, especially when gambling opportunities offered are subject to a significant time limitation” but our analysis indicated that **47% (217,305) of all gambling related Tweets in our sample contravened this regulatory advice.**

We found **19% (102,137) of gambling-related Tweets** using “free” or “matched bets” to incentivise users to open accounts, or to bet on specific events. Since Tweets are very short (max. 280 characters) it is highly unlikely that these offers are explained sufficiently, and thus might breach CAP Code 16.3.2, which prohibits marketing communications that exploit the susceptibility or inexperience of young or vulnerable groups.

Promotional offers made on social media advertising requires special attention in the review of the Act.

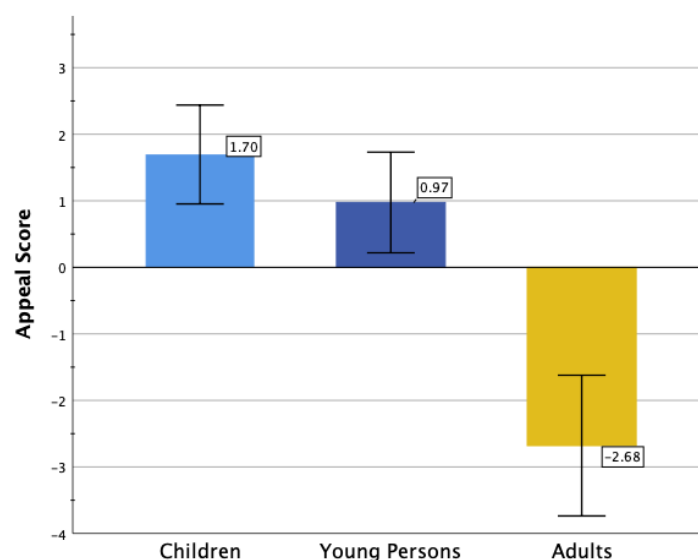
e) The issue of Esports Betting Adverts and its appeal to children

[Esports gambling](#) is a growing area that is specifically spurred on by new technologies. By its very nature eSports is online and gambling has quickly become part of the sports' ecosystem. Participants and spectators are typically young adults -a group at risk from gambling. Based on the young target group, and inherent high appeal to young people, we believe that a ban of esports betting ads is needed.

The average tennis spectator is 61, whereas esports spectators are on average 26. Major bookmakers such as PaddyPower, Bet365 and Betway, along with many niche operators, are now offering bets on esports tournaments. Monthly esports betting revenues for UK operators rose 30-fold between March 2019 and March 2020, and by June they had more than doubled again.

The danger is that younger people are being drawn to gamble on esports. In 2019, 17% of esports gamblers were aged 18-24. In general, more and more UK 16-34-year-olds are gambling, and the average age of gamblers is decreasing. The number of problem gamblers aged 11-16 has also quadrupled to more than 50,000 in just two years. This comes at a time when 93% of UK children play video games, averaging three hours a day and a growing number also follow professional esports teams.

With esports players and spectators, being on in their early 20s, every marketing campaign will – inadvertently or not – also target people under 18. The almost inherent appeal of this, was also evident in our research into the appeal of gambling ads. The bar-chart below shows, that esports gambling advertising was strongly appealing to children (11-17 years) and young persons (18-24 years) but triggered negative emotions in adults – who indeed 'hated' the ads.



Conclusion:

In light of the current technological landscape, we believe a full social media gambling advertising ban might be the only way to ensure the protection of vulnerable groups in this area. Other countries have already started implementing tight restrictions to gambling advertising, including Italy, Belgium and Spain, who banned gambling ads almost completely, or Germany and the Netherlands who have intervened substantially.

As a bare minimum, we believe that specific online advertising regulations need to be introduced. Currently, the ASA argues that UK advertising is well regulated and under control, but the stipulation that rules “apply equally to online as to offline advertising” makes little sense given the “social” characteristics and possibilities of social media that simply don’t apply to traditional media. The “snowballing” effect created when users follow and engage with Twitter posts from gambling companies only applies to social media. This is currently completely unregulated.

The UK government review of the Gambling Act to “ensure gambling laws are for the digital age” is a perfect opportunity to create new, social media specific regulations. We strongly urge the UK government to take this chance.

Q4 Is it possible for a regulator to stay abreast of innovation in the online sphere?

The online sphere is evolving at incredible speed. Many of the areas we have focused on in the digital marketing sphere did not really exist 10 years ago. New developments and software, such as the Metaverse, TikTok, ChatGPT, esports, Augmented Reality, etc. will continue to change the online sphere rapidly. As shown by our research into gambling advertising, we already see that regulation of online gambling falls across several regulators with the risk of regulatory ping-pong where issues get passed from one regulator to another without any satisfactory resolution. This is the reason why the government set up the Digital Regulation Cooperation Forum in 2020. If that forum works effectively to address cross-regulator issues, the Gambling Commission should become a member.

Response led by

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