

Associate Professor Samantha Thomas, Dr Hannah Pitt and Professor Mike Daube – Written evidence (GAM0097)

A/Prof Samantha Thomas

Samantha Thomas is Associate Professor of Public Health at Deakin University in Australia. She specialises in understanding the impact of gambling industry strategies, and government policies, on gambling related harm. She is most well known for her research examining the impact of gambling marketing on young people. Her research has been cited in the Australian Parliament, the United Kingdom House of Lords, and in an amicus brief to the US Supreme Court. She regularly comments to the national and international media on gambling related harm. From the 1st January 2020 she will take up the position of Professor of Public Health at Deakin University.

Dr Hannah Pitt

Hannah Pitt is an Associate Research Fellow at Deakin University in Australia. Her research has mostly focused on exploring the different factors normalising gambling within different at risk population groups including young people, women, older adults, and people with intellectual disability. Her PhD on sports betting advertising and young people, had significant impact on raising awareness about sports betting advertising amongst the community, influenced community education campaigns, and has contributed to evidence supporting regulatory changes to reduce gambling advertising during sport.

Emeritus Professor Mike Daube AO Hon DSci FPHAA FFPH

Mike Daube is Emeritus Professor in the Faculty of Health Sciences at Curtin University in Perth, Western Australia. His previous roles have included Director General of Health for Western Australia and Chair of the National Public Health Partnership. He has been a leader in public health policy and programs for nearly fifty years, originally in the UK, since 1984 in Australia and internationally, with a focus on tobacco, alcohol and more recently gambling research.

1. The changing gambling environment and the normalisation of gambling.

1.1 The wagering environment in Australia is very similar to the environment in the United Kingdom. Online wagering is available 24 hours a day, 7 days a week, on an almost unlimited range of sport and horse racing markets across the globe. Individuals in Australia and the United Kingdom can sit in their lounge rooms and bet on tens of thousands of sporting outcomes on sports such as the Rugby World Cup in Japan, American Basketball, Indonesian Soccer, Canadian Ice Hockey, and Gaelic Sports. British owned companies operate across the globe, with Ladbrokes, Bet365, and until recently, William Hill all established brand names in the Australian market. Gambling is now a high tech global industry with branded products specifically aimed to appeal to a range of different population subgroups. As a participant in one of our studies commented: *"I can sit on the beach and punt on my phone."*

1.2 Alongside these new technologies have been marketing strategies which have aimed to normalise gambling as an activity that is embedded in everyday life. Similar to the strategies that have been observed for other products, such as tobacco, the aim is to ensure that gambling is available and accessible, is regularly engaged in, and is socially and culturally accepted. In 2018, our research team defined the normalisation of gambling as:

'The interplay of socio-cultural, environmental, commercial and political processes which influence how different gambling activities and products are made available and accessible, encourage recent and regular use, and become a socially and culturally accepted part of everyday life for individuals, their families, and communities.' ^[1]

1.3 Integral to the normalisation of gambling products is the way in which these products are marketed and promoted to different audience segments. There have been a number of research studies in Australia and the United Kingdom, alongside significant concern in both countries about the role of marketing in the normalisation of gambling for children. Community concern about the impact of gambling advertising during sport led UNICEF Australia, the leading organisation aimed at advocating for the rights of children, to urge the Australian government to tighten regulations associated with gambling advertising, stating *'this policy issue has an undeniable and significant impact on children'* ^[2].

2. Gambling marketing and young people

2.1 Research in both Australia and the United Kingdom has demonstrated the impact of gambling marketing strategies on young people's recall of and receptivity to gambling products and brands. Much of this research has been modelled on research from tobacco, which clearly demonstrated the impact of cigarette advertising on young people's *initiation* and *continuation* of smoking. Tobacco research also demonstrated that brand recall and loyalty at a young age influenced young people's brand preferences into adulthood. Key to this was *consumer socialisation*, or *'the process by which young people develop skills, knowledge, and attitudes, relevant to their functioning in the market place'* ^[3]. Young people's consumer socialisation may be influenced by family members,

peer groups, social agencies, and the media (including advertising and the promotion of products).

2.2 Research from Australia and the United Kingdom has demonstrated the impact of marketing on positively shaping young people's gambling attitudes, their receptivity to gambling brands, and ultimately their intentions to gamble when they are older. Marketing plays a role in normalising gambling – that is, it plays a role in influencing young people to think this is an everyday activity that is associated with, for example, viewing and engaging in sport. While there is significantly more research on the impact of gambling marketing on young people in Australia, researchers in the United Kingdom have started to replicate these Australian studies, adapting them for local contexts. So far, the findings across these Australian and United Kingdom studies are very similar. This is perhaps unsurprising given the similarities in the alignment between gambling and sport in both Australia and the United Kingdom, and the number of bookmakers that operate in both countries (with very similar marketing strategies). The following provides a brief summary of some of the key findings from these studies.

2.3 Exposure

Research shows that young people are exposed to promotions for gambling in a range of different environments. The research shows that we can no longer assume that young people only see these promotions within commercial break advertising.

- Young people are exposed to gambling advertising across a range of different media platforms, including television, social media, community environments, and at sporting events [4, 5].
- Young people are very aware of these gambling promotions in their everyday environments. This is particularly the case for young people who are fans of sport. In Australia, over 90% of young people recall gambling advertising on television, followed by sports stadium advertising, on websites and hearing gambling advertising on the radio. [4]
- Recent studies have also shown that exposure to gambling promotions does not only occur in traditional media environments. In the most recent study of children's awareness of gambling advertising, Thomas et al. [6] found that television was the environment where most young people reported seeing gambling advertising. However, over half of young people also saw gambling advertising on social media sites, including YouTube, Instagram and Snapchat. As one participant in this study stated: *I've seen them heaps in YouTube basketball videos. The ads pop up and they are the same as on the television.* - 12-year-old boy.
- However, this research also showed that young people do not always recognise these social media promotions as advertising. For example, another participant in this study described advertising as being embedded within videos that he watched on YouTube. While he recognised that promotions were from a certain betting company, but did not perceive these to be advertising: *"I see them] on YouTube before I watch a video. A funny Sportsbet skit comes on. It's not about gambling though... I see them when I watch highlights too."* - 15-year-old boy.

This research suggests that while many regulations have focused on television based commercial break advertising, we also need to recognise that young people recall seeing gambling advertising in a range of media and sporting environments.

2.4 Brand recall and awareness

Research from both Australia and the United Kingdom now consistently shows that young people have very clear recall of gambling brands – particularly if they are fans of sport. This recall starts from a very young age – as young as 8 years old in some studies. Brand recall and awareness is arguably the first building block in establishing brand loyalty.

- A recent Australian study showed that over three quarters of young people aged 8-16 years could name at least one sports betting brand, with about one in four able to name at least four or more brands [2].
- When the brand names of companies were obscured, Nyemcsok and colleagues [5] found that three quarters of young people were still able to identify the brand associated with the advertisements, and when told the name of a sports betting brand, over 90 per cent of young people were able to correctly identify the colour of at least one brand. This shows the depth of recall that young people have of these advertisements. Nyemcsok and colleagues also showed that there were some types of promotions that influenced recall of brands, in particular 'deal' based promotions, such as cash or money back offers, as well as distinctive voiceovers. Highlighting the global impact of marketing strategies, one adolescent girl stated: "*Some guy rambling about the odds. Ladbrokes is different. Has a British guy talking.*" – 16-year-old girl.
- Pitt and colleagues [8] found young people aged 8-16 years were able to recall promotions they had seen in sports betting advertisements, with some able to identify promotions for specific brands.
- In a study of 85 children aged 5–12 years, three quarters (77 %) were able to identify at least one correct shirt sponsor associated with food, alcohol or gambling companies [9].
- Data from a United Kingdom study (replicated from our Australian research) conducted by Djohari and colleagues (2018) with a community sample of young people demonstrated that just under half were able, unprompted, to recall at least one gambling brand, with some children able to name up to 5 gambling brands. When provided with a range of brands to select as their favourite brand, a quarter selected a gambling company as their favourite brand, with some children stating that it was their favourite brand because it was the most recognisable, or the one that they had most commonly heard of [10].

2.5 Attitudes towards gambling and intentions to gamble

- Research shows that young people are positively influenced by the gambling advertising that they see during sport. For example, young people believe that gambling on sport makes people more invested in the game, and more committed sports fans because of the advertising that they see [11].

- A third of young people indicated that they would like to try gambling either now or in the future, with most young people wanting to try sports betting over other forms of gambling ^[12].

Importantly, it is inducement marketing that appears to significantly influence young people's attitudes towards wagering, and in particular the risks associated with wagering.

- Young people perceive that inducement promotions (such as free or bonus bet promotions, or cash back offers) allow individuals to try gambling without the risk of losing money.^[11]
- In another study, young people believed that inducement promotions could lead people to believe that they would not lose money when they were gambling ^[5]. For example, one child stated that these promotions meant that people were unlikely to get "ripped off". Another girl from this study stated: *"They tell you to spend money on it and they say you have guaranteed money back. So it's trying to reassure that you won't lose, and it's on in every ad break."* – 13-year-old girl.
- Studies in both Australia and the United Kingdom have demonstrated that about 75 per cent of young people perceive that gambling was a normal or common part of sport ^[4, 10]. Studies from the UK demonstrate the extent to which young people perceive that gambling is a normal part of sports fans behaviours.
- In the Djohari study^[5] children discussed gambling intentions: *"It's normal for under 18's to bet with friends. I put £2 on Man U with other young people."* - 13-year-old male. Another child in the Djohari study stated: *'Because if they love football it (betting) is part of wanting their team to win.'* - 8-year-old male
- In the most recent Australian study on this topic, Nyemcsok and colleagues^[5] found that a fifth said they would bet on sport when they were older. Perceptions of being knowledgeable about a particular sport influenced their gambling attitudes. For example, one child stated that they would bet on a sport they were familiar with because: *"I know which teams are going to get through and the statistics for them."* However, perceptions of reduced risk also influenced which company they perceived they would bet with when they were older. For example one child stated they would bet with a particular company because *"... if you bet with them you can get your money back."* – 11-year-old boy.
- However, young people are concerned about the normalisation of gambling. Thomas ^[13] interviewed 61 adolescents aged 14-18 years, and found that young people were concerned that advertising depicted sports betting as easy, and could add excitement to the sports viewing experience.

3. What do children think should be done about gambling advertising?

- Thomas et al [2019] found that the large majority of 11-16 year olds felt that there was too much gambling advertising in sport ^[6]. Children stated that there should be "none" or "less" gambling advertising in sport.
- Three quarters of young people in this study believed that sporting teams and codes should do more to prevent young people like themselves being exposed to ads while watching sport. As one participant stated: *"People*

want to watch the game and not see the ads, they don't need to be encouraged to have a bet or see the offers." - 11-year-old boy

4. Summary and ways forward.

4.1 There are many lessons that could be learned from the research with children both in Australia and the United Kingdom. Clearly there are similarities in the impact of gambling marketing on young people in both countries. Concerned about its impact on young people, politicians in Australia, Belgium and Italy have brought in restrictions, but the UK Government has been reluctant to act, preferring self-regulation, responsible gambling, and educational activities that aim to raise awareness of problem gambling.

4.2 While a 'whistle to whistle' ban on advertising has wide support, evidence from Australia would suggest that this type of ban does not go far enough in protecting young people from being exposed to gambling advertising. In early 2018, Australia implemented a ban on gambling advertising in live sport (up until an 8.30pm cut-off, with some exemptions for minor audience channels). Our research team spoke to children after this ban. Children still saw gambling advertising. They saw gambling advertising before and after sporting matches, and also saw gambling advertising outside of sporting programs, including on social media platforms. They also saw other forms of promotions for gambling, such as shirt sponsorship, gambling logos on hoardings, and embedded advertising on signage on the sports court or field. This is an important finding, given that there is no evidence to suggest gambling advertising outside of sport is any less influential than advertising within live sporting matches. As such, restricting all forms of promotions should be considered.

4.3 If we apply the principle of 'logic based on parallel evidence'^[14], the only way that we can significantly reduce young people's exposure to gambling advertising is by applying the comprehensive approach has been applied in other public health initiatives. For example, a comprehensive approach in tobacco control in the United Kingdom and the rest of the world restricted not just tobacco advertising, but also promotions, and sponsorship. This is important given that Australian and British research has shown that gambling advertisements during commercial breaks are not the only, or even the most prevalent, form of marketing ^[15].

4.4 Some have suggested that an appropriate response is to engage in awareness raising campaigns or educational programs with young people or their parents. While these strategies may be well intentioned, there is limited evidence to support the effectiveness of these current education strategies. In order to be effective, research from other areas of public health shows that such educational strategies must be independent of industry influence, sustained and adequately funded, based on research evidence, and backed up by broader regulatory frameworks which restrict both exposure and access to products, as well as significant restrictions on the marketing of these products. Research shows that children and parents are supportive of stricter regulation of gambling marketing, with many supportive of bans similar to those implemented for tobacco ^[16]. Young people are also aware of the purposes of gambling

advertising, and that advertising has an impact on gambling attitudes and behaviours. A twelve year old in one of our recent studies stated:

It would be good if you could like stop the ads, because the ads are influencing a lot. . . I don't think you would be able to stop betting, like in total. But if the ads go away, sports betting won't get as much money, which means less people bet because less people actually think about it. - 12-year-old boy

These perspectives from children are powerful reminders of the role that government must play in protecting the health and wellbeing of children, and in preventing gambling related harm in future generations.

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