

Perspectives

Protecting children and young people from contemporary marketing for gambling

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Abstract

Around the world, children are being exposed to intensive marketing for gambling products. This normalizes perceptions that gambling is essentially a harmless form of entertainment, despite mounting evidence of the harms it causes. Young people and their parents are supportive of strategies to protect children from being exposed to gambling marketing. Yet existing regulatory efforts are inconsistent and inadequate, and have not protected children from exposure to the many forms of marketing now being developed and exploited by the gambling industry. We outline existing knowledge about strategies used by the gambling industry to market its products, with a specific focus on the potential impact of gambling marketing on young people. We provide a definition of gambling marketing and outline the different forms of promotion that are currently used to market gambling, current regulatory responses, and the impact of marketing on children and young people. We then argue that a comprehensive public health approach to gambling is urgently required, which must include effective action to limit the influence of marketing for gambling products, while recognizing that it is never possible to insulate children entirely from their reach.

Lay summary

- Gambling marketing has become particularly pervasive and aligned with major cultural activities such as sport.
- Evidence clearly shows the normalizing impact of marketing on children and young people's gambling attitudes and consumption intentions.
- Current regulatory efforts are inadequate and have not protected children and young people from exposure to a range of different forms of marketing.
- Young people and their parents support the implementation of significant restrictions on gambling marketing.
- The array of marketing mechanisms used by the gambling industry should be addressed as part of a comprehensive public health policy approach to protect children from gambling harms.

Keywords: youth gambling, advertising, public health, children, determinants of health

INTRODUCTION

A rapidly transforming industry

There is increasing recognition among researchers and policymakers about the scale of the severe social and

health-related harms associated with gambling for individuals, their families and communities (Markham and Young, 2015; Orford, 2019; John *et al.*, 2020; van Schalkwyk *et al.*, 2021b). These harms include relationship breakdown, physical ill-health, decreased academic

performance, job loss, debt, violence, crime, homelessness, energy poverty and suicide (Browne *et al.*, 2016; Vitaro *et al.*, 2018; Farrell and Fry, 2021; Vandenberg *et al.*, 2021). The social and economic costs of gambling have been widely recognized. For example, in England the annual economic burden of harmful gambling has been estimated at about £1.27 billion (Belloni *et al.*, 2021), and the social costs of gambling in the Australian state of Victoria were estimated at AUD\$7 billion (Browne *et al.*, 2017). While there are a range of socio-cultural, environmental, commercial and political determinants that may contribute to gambling harms, researchers have identified that the tactics employed by the gambling industry have much in common with those employed by the producers of other unhealthy commodities, such as alcohol and tobacco (Thomas *et al.*, 2016a, 2018c; Gottlieb *et al.*, 2021; Knai *et al.*, 2021; van Schalkwyk *et al.*, 2021b). Like other harmful industries, gambling companies must ensure a continuing customer base. This includes attracting young people who may be future gamblers, consuming an increasingly novel and sophisticated range of products.

The gambling industry has benefitted from technological advances that have driven a transformation of the industry (Schüll, 2012). These have included the development of innovative, high-intensity products such as electronic gambling machines, online lotteries, in-play forms of sports betting and online casinos, alongside new marketing strategies using an ever-increasing range of media channels. Unlike other unhealthy commodities, gambling products are often instantaneously accessible through online media platforms. There are no temporal, spatial or physical limits to consumption, and product design makes possible rapid life-changing monetary losses. New gambling ‘venues’ operating 24 h a day, alongside the development of online banking systems that allow immediate access to funds, have enabled the rapid expansion of the gambling industry across borders. The industry has rapidly and effectively used emerging opportunities to market its products, and has employed a range of tactics to avoid effective evidence-based regulation, including lobbying, political donations, funding research and education programmes, and promoting ineffective voluntary self-regulation, and establishing self-proclaimed industry ‘watchdog’ organizations (van Schalkwyk *et al.*, 2021a). This has included moving into new and emerging markets such as those in Sub-Saharan Africa that so far have lacked traditional land-based gambling infrastructure (Bunn *et al.*, 2020).

Government regulation of the gambling industry

Many governments have adopted a *laissez faire* approach to regulating the gambling industry

(Guillou-Landreat *et al.*, 2021). Governments have failed to keep pace with the rapidly changing nature of the industry, retaining regulatory structures focused on traditional forms of land-based products (such as electronic gambling machines, wagers placed in betting shops or at racetracks, lottery products and casino games), and relying on self-regulation of marketing practices. Governments often employ ‘responsibility’ paradigms, which are also promoted by the gambling industry, that place the onus mainly on individuals to control how they engage with gambling products (Miller *et al.*, 2016; Thomas *et al.*, 2016a; Alexius, 2017; Marko *et al.*, 2022). These approaches are coupled with messaging strategies that serve to normalize gambling, and minimize possible concerns about gambling harm (Thomas *et al.*, 2018b). While acknowledging that gambling can lead to health and social harms, messages from government highlight that ‘balance’ is needed in regulatory approaches, including the theme that being able to gamble is a fundamental right: ‘... many people are able to gamble reasonably. We’re a free country, and people should be allowed to do that’ (Philip, 2022). Government messages about ‘safe’ levels of gambling are often similar to those promoted by the gambling industry. For example, messages from the UK gambling regulator regarding the Six Nations Rugby Tournament stated that: ‘We want to make sure that everyone is staying safe while they gamble...’ (Gambling Commission, 2022). This was similar to messages from the UK gambling industry’s self-proclaimed standards body the Betting and Gaming Council (BGC), which included messages such as: ‘We want everyone to enjoy their weekend of sport and bet safely’ (Betting and Gaming Council, 2022b). These types of messages do little to counter innovative gambling products, or the range of omnipresent commercial marketing strategies that encourage individuals to gamble (van Schalkwyk *et al.*, 2021a). The dominant framing of gambling as an issue of personal responsibility, further promoted by these forms of messaging, can undermine public health efforts to prevent gambling harm by deflecting attention from the responsibilities of industry and governments (Alexius, 2017).

The failure of governments to act comprehensively to prevent gambling harm contrasts with evidence from public surveys showing that: most people have ‘unfavourable attitudes’ about gambling [(Donaldson *et al.*, 2016), p. 256]; they support measures to restrict the availability and accessibility of gambling products in community settings; and most agree that health policy should be protected from the influence of the gambling industry or its representatives (Donaldson *et al.*, 2016; Thomas *et al.*, 2017; Holden, 2022). A survey conducted by the UK gambling regulator in 2020 found that over 80% of respondents agreed that there were too many opportunities to gamble, over 70%

thought gambling was bad for family life, and less than 20% agreed that on balance gambling was good for society (Gambling Commission, 2021). There are similar findings from sports fans, who are arguably a key target market for the gambling industry. A recent survey conducted by the Australian Football League Fans Association found that gambling was the second highest concern for respondents (AFL Fans Association, 2022).

Despite the negative community view of gambling, several stakeholders derive financial benefits from gambling, creating a barrier to the adoption of comprehensive policies to protect the health and wellbeing of the public—particularly when *‘those benefitting from gambling tend to have a more powerful societal position than those suffering from its consequences’* [(Marionneau and Nikkinen, 2020), p. 102]. Such stakeholders may include retailers, sporting organizations, broadcasters and the government, as well as some academics, treatment services and education providers. It should also be noted that in countries such as the UK and Australia, gambling companies have provided generous support to political parties (Chaplain, 2021; Convery, 2021; Tiang *et al.*, 2021; Booker, 2022). Policy decisions about gambling are also likely to be influenced by perceptions of economic benefit, through issues such as taxation revenue and employment (Finkelstein, 2021).

Omnipresent and sophisticated marketing strategies

The industry’s creative product development has been accompanied by innovative and sophisticated marketing strategies that seek to ensure that its messages are ubiquitous. Gambling marketing now takes many shapes and forms, is promoted through multiple media channels, and is increasingly identified with highly valued cultural activities such as sport (Torrance *et al.*, 2021). As with other health-damaging products (Brownell and Warner, 2009; Moodie *et al.*, 2013), the gambling industry relies on marketing to stimulate demand for its products, to normalize gambling as an aspect of everyday leisure activity, and to promote its image as a responsible corporate citizen.

We define the contemporary marketing of gambling as:

The full range of direct and indirect advertising, promotion, sponsorship, incentives, public relations, lobbying, and donations that are strategically used by the gambling industry to promote its products, gain publicity, attract new customers, shape social and cultural attitudes, and build corporate and product image and support.

In this context, we see marketing as practices that have two interrelated functions: (i) to promote gambling products and corporate branding, and (ii) to promote the corporation’s image as that of a good citizen demonstrating social responsibility. Thus, the industry builds legitimacy in the mind of the public and policy-makers, and by creating this image it can prevent or delay regulation by governments.

The reason why marketing is important is that it has become core to the industry’s business model. It encourages people to visit gambling ‘venues’ (in both physical and new media environments), sign up to gambling accounts and loyalty programmes and initiate and continue their use of gambling products. After the United States Supreme Court overturned a federal ban on sports betting (Petrota and McGuire, 2021), media insight company Nielsen reported a ‘ramp-up’ in spending on advertising from the sports betting industry since 2019, with over \$153 million spent on local ‘spot’ advertising in 2021 (Nielsen, 2021). Online gambling now ranks 11th among 1200 product categories for television ‘spot’ advertising dollars in the USA, accounting for a 2.1% share, with Nielsen describing it as a ‘golden goose’ for the local television industry (Nielsen, 2021).

These figures capture only a small part of the industry’s marketing activity and there is less accessible information on what it spends elsewhere, including on ‘below-the-line’ social media advertising. However, evidence suggests that marketing budgets extend far beyond those documented for the most visible forms of advertising. For example, in the five financial years from 2016 to 2020, Crown Casino in Melbourne alone spent ‘\$2.46 billion on marketing, rewards and other benefits and enticements to attract customers’ (Finkelstein, 2021). Additional marketing strategies take advantage of personalized tracking software and new banking technologies, working in spaces largely outside of government oversight, to target gambling promotions to individuals (Christi, 2022).

The global case for protecting young people from exposure to gambling marketing

Globally, children and young people are being exposed to a gambling marketing environment i.e. unprecedented in terms of scale, form and sophistication. The United Nations Convention on the Rights of the Child (1989) reinforces the importance of approaching the health of children from a rights-based perspective, including the right of the child to the enjoyment of the highest attainable standard of health (Article 24). Globally, there is also clear recognition that children and young people should be, to the greatest extent possible, protected from exposure to marketing of harmful or unhealthy

products. For example, in 2020 the WHO/UNICEF/Lancet Commission on A Future for the World's Children? called for a comprehensive approach to the regulation of marketing for unhealthy products, which the report argued can 'exploit their developmental vulnerability and ...can harm their health and wellbeing' [(Clark *et al.*, 2020), p. 606]. The report called for the development of an Optional Protocol to the United Nations Conventions on the Rights of the Child:

.... to protect children from the marketing of tobacco, alcohol, formula milk, sugar-sweetened beverages, gambling, and potentially damaging social media, and the inappropriate use of their personal data. (p. 606)

The report also noted that children and young people can have a fundamental role to play in addressing the impacts of unhealthy marketing, and that their perspectives should be listened to and integrated into policy and monitoring (Clark *et al.*, 2020; Dalglish *et al.*, 2021).

We now know much more about how exposure to gambling marketing strategies may contribute to the normalization of gambling for children and young people (Thomas *et al.*, 2018b; Nyemcsok *et al.*, 2021). Exposure is the first building block in any marketing strategy, and can shape positive attitudes towards, and the initiation of use of the products in question (Harris *et al.*, 2021). This has been seen with childhood exposure to a range of different forms of tobacco and novel tobacco product marketing, which includes weakening their resolve not to smoke (Wakefield *et al.*, 2006), and influencing their perceptions of the harms associated with tobacco products (Petrescu *et al.*, 2017). Greater exposure to tobacco advertising has also been shown to lead to a greater risk of smoking initiation (DiFranza *et al.*, 2006). Youth alcohol consumption has also been associated with exposure to alcohol marketing (Sargent and Babor, 2020).

Significant curbs and, ultimately, bans on tobacco advertising and promotion thus represent a key pillar of the comprehensive public health approach presented in the WHO Framework Convention on Tobacco Control (World Health Organisation, 2003), with full advertising and promotion bans associated with decreased tobacco initiation and consumption, particularly in young people (Flor *et al.*, 2021). The importance of these measures is apparent from the strategies through which the tobacco industry has sought to circumvent these curbs with novel forms of promotion, particularly through social media platforms (White and Daube, 2021). This behaviour has also been emulated by the alcohol and gambling industries. Of course, these companies argue that their advertising is not *directed* at children, but this is now widely seen as specious, indicated by the wording

in the 2022 Swiss referendum on tobacco advertising's support for prohibiting any form of advertising for tobacco products which reaches children and young people (Enfants sans tabac, 2022; SwissInfo, 2022).

While many countries prohibit children from engaging legally in most forms of gambling until at least 18 years of age, we know that they are regularly exposed to the marketing of many gambling products in a range of physical and online environments (Pitt *et al.*, 2016b; Thomas *et al.*, 2018a). Bodies representing the gambling industry claim that they are committed to 'socially responsible' advertising, ensuring that 'betting and gaming advertising, sponsorship, marketing and promotional campaigns are run to the highest standards of probity' (Betting and Gaming Council, 2022a), and the industry's voluntary codes state that 'advertising and promotions will not target children (or sectors which are directly connected with children)...?' [(Irish Bookmakers Association, 2021), p. 6]. The Wagering Advertising Code, developed by the Australian Association of National Advertisers, which includes members such as Sportsbet, McDonalds, Coca Cola and Hungry Jacks, also contains provisions, based on an 'objective test', to ensure that marketing and communications for wagering products and services are not directed primarily to minors (Australian Association of National Advertisers, 2018).

The risk to children is conceded, to some extent, in many existing policies of governments and advertising standards bodies, e.g. prohibiting gambling advertising that appeals to or features children or reaches them through free to air programming within certain time slots (ASA and CAP, 2018; Australian Communication and Media Authority, 2020) (although it is important to note that such measures are less common in low- and middle-income countries (LMICs) where the global gambling industry has entered the market more recently Bunn *et al.*, 2020). However, it is clear that measures that focus on restricting gambling marketing within narrowly defined timeslots or events are insufficient to protect children, with ample evidence that the gambling industry simply uses new techniques to circumvent these restrictions. For example, in early 2018, Australia implemented regulations which banned gambling advertising in live sport (up until an 8.30 pm cut-off, with some exemptions) (Australian Communication and Media Authority, 2021). Research commissioned to evaluate the impact of these bans demonstrated that while gambling 'spots' declined before the 8.30 pm watershed, those broadcast during breaks in play and pre- and post-game coverage after 8.30 pm increased 131% over the same period (Australian Communication and Media Authority, 2019). Further, these restrictions do not limit the range of other promotions that the industry may use—e.g. in-ground signage and jersey sponsorship. After the implementation

of the ban in Australia, children reported that they had observed gambling advertising after 8.30 pm, and recalled many other forms of gambling promotions during sporting events (Thomas *et al.*, 2018a). It is perhaps not surprising then that these types of limited restrictions are popular with the gambling industry, with industry bodies in the UK claiming, that voluntary ‘whistle to whistle’ bans on commercial break advertising during live sport had ‘effectively eliminated children’s ability to view betting adverts during live televised sport’ (Betting and Gaming Council, 2020b). There is evidence however, that with the right political will, governments can enact comprehensive restrictions on gambling marketing. For example, regulations have been published by the Spanish government (Royal Decree 958/2020 on the Commercial Communications of Gambling), restricting most forms of gambling marketing outside the period of 1am to 5am and prohibiting the sponsorship of premises, sports t-shirts, equipment, teams or competitions (European Commission, 2021), in an effort to protect vulnerable individuals including young people (InfoPlay, 2020).

How can we use existing knowledge about the impact of gambling marketing on children, complemented

by insights from measures to reduce the risks associated with harmful commodities such as alcohol and tobacco, to develop a comprehensive public health approach to protect children from exposure to the marketing of gambling?

THE NATURE AND EXTENT OF CONTEMPORARY GAMBLING MARKETING STRATEGIES

So far, attention from researchers, advocates and policymakers has focussed on the most visible gambling marketing strategies such as commercial break advertising, sports and jersey sponsorship and inducement based marketing (such as ‘free’ bets). However, we know that there are other less well-recognized forms of marketing of gambling, where we can draw on insights from research on other unhealthy commodities (VicHealth, 2020).

Figure 1 outlines the vast suite of gambling marketing activities that children may be exposed to in their everyday environments.

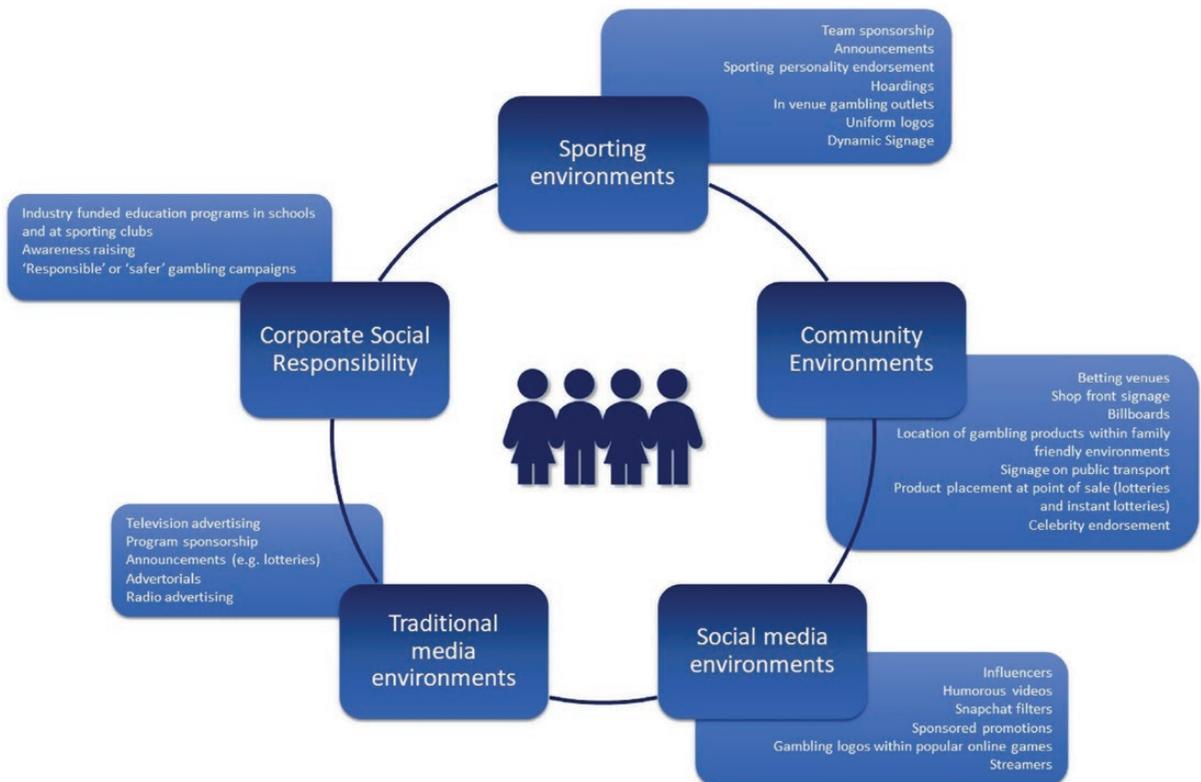


Fig. 1: Examples of the range of gambling marketing strategies that children and young people may see in their everyday environments.

The role of branding and below the line marketing

Branding is an important part of marketing, with multinational companies offering numerous brand offerings designed to appeal to different audience segments. For example, the Flutter Group states they have ‘*some of the world’s most innovative, diverse and distinctive sports betting and gaming brands*’, including Paddy Power (in the UK and Ireland), Betfair (Global), Fanduel (USA), Sportsbet (Australia), adjarabet (Georgia), FoxBet (USA) and the global Pokerstars (Flutter, n.d.). Branding may also include partnerships between gambling companies and popular comics and feature films (Playtech, n.d.), celebrity endorsements of gambling products (Wilkinson, 2021) and relationship marketing, including the use of influencers, on social media platforms such as Twitter, YouTube and Instagram (Stadler and Naraine, 2020). Research shows that these types of marketing may be particularly appealing to young people (Nyemcsok et al., 2018; Pitt et al., 2018; Thomas et al., 2018a). Gambling companies have also taken advantage of new technologies to promote gambling through social media sites (Thomas et al., 2015), along with reports documenting the use of Artificial Intelligence to target customers with ‘*bespoke ads and incentives*’ (Busby, 2018). Celebrity endorsement can also extend the social media reach of brands through other channels. For example, a recent campaign from Western Australian company TABTouch featuring Gene Simmons from rock band KISS was also shared on the KISS YouTube channel (KISS, 2022). These online forms of marketing are particularly important when considering reports from Ofcom, the British media regulator, that 97% of 5–15 year olds consumed media content via video sharing platforms in 2020 (Ofcom, 2021).

There are also a range of brand marketing strategies which may not be overtly recognizable as forms of marketing. Carah and Brodmerkel define below the line marketing as marketing i.e. ‘*hidden in the social media feeds of individual users, invisible to those outside of the target audience, and not publicly archived*’, e.g. sponsored posts popping up in Instagram feeds, or industry branded filters available on Snapchat [(Carah and Brodmerkel, 2021), p. 21]. Other novel branding strategies have included people streaming themselves gambling via new social media platforms (Tsiaoussidis, 2022), as well as the use of humorous online videos to engage and build relationships with consumers. While these types of activities tend to fall outside the remit of regulators and are not normally classified as ‘marketing’, they may have particular appeal for young people (VicHealth, 2020). There are also concerns about new phenomena that have similarities with gambling, such as

increasing use of cryptocurrency in sport sponsorship and the marketing of non-fungible tokens via high-profile sporting figures (ASA, 2021b; Davies and Ferris, 2022).

Corporate social responsibility strategies

‘Corporate social responsibility’ (CSR) strategies are rarely considered in discussions about the impact of gambling marketing on children and young people. However, CSR activities are a valuable form of marketing used by industries that produce harmful commodities to promote (or rebuild) their corporate image and indirectly support their other promotional activities (Mialon and McCambridge, 2018; Kostygina et al., 2021). As Gottlieb et al. (2021) explain:

When an industry sells an addictive and harmful product, markets it to leverage the power of its addictive qualities, and then needs to pay scientists to manufacture doubt about the impact of the product on health, it is important to perform gestures of charity to generate some good will from the public. (p. 1716)

CSR strategies are used by these industries to gain legitimacy, promote their corporate image and reputation and counter criticisms about their harmful activities (McDaniel et al., 2018; Dhandhanian and O’Higgins, 2021; McCambridge et al., 2022). They may include funding of youth prevention education programmes, research, ‘good causes’, public information activities and education campaigns (Pettigrew et al., 2016; Hunt et al., 2020; Pettigrew et al., 2020; Dhandhanian and O’Higgins, 2021). Researchers have demonstrated that the CSR strategies of the alcohol and tobacco industries serve public relations rather than public health goals, have been used to resist regulatory reform, and have undermined public health prevention activities (Fooks et al., 2013; Brennan et al., 2017; van Schalkwyk et al., 2022b). Analogous to those organized by the alcohol and tobacco industries, gambling industry CSR campaigns have included ‘responsible gambling’ initiatives, which sometimes bear ‘*great similarity both in name and substance*’ to tobacco industry initiatives [(Gottlieb et al., 2021), p. 1722]. Gambling companies have launched a range of ‘responsible gambling’ campaigns which often feature the same celebrities that appear in their commercial marketing strategies. For example, Ladbrokes launched a series of commercial and responsible gambling campaigns in Australia featuring A-lister Mark Wahlberg:

Following on the back of its recently released ‘Ladbroke It’ campaign featuring Wahlberg as Chief Entertainment Officer ‘Mike Iceberg’, Entain, which

operates Ladbrokes in Australia, will today release a dedicated responsible gambling TV commercial, set to the iconic soundtrack of ‘The Gambler’. Ladbrokes is committed to reaching over 8 million Australians with its dedicated ‘Stay in Control’ messaging which helps Aussie punters understand that if it’s no longer entertaining, it’s time to walk away (Hackett, 2021).

Many of the gambling industry’s CSR initiatives serve as purported ‘warnings’ or ‘consumer information’ presented alongside their marketing (van Schalkwyk *et al.*, 2021a). These messages are overshadowed by direct product marketing in terms of prominence of presentation and generally contain no explicit warnings about risk of harms (Critchlow *et al.*, 2020). The gambling industry also funds youth gambling prevention programmes (van Schalkwyk *et al.*, 2022a). For example, in the UK, the Betting and Gaming Council funds two charities—YGAM and treatment provider GamCare—to deliver a £10 million education programme to ‘*equip a generation of young people to better understand the risks associated with gambling and engage with gambling products and environments in an informed way*’ (Betting and Gaming Council, 2020a). Researchers have concluded that there is a clash between CSR initiatives and the financial interests of the gambling industry, with the industry only engaging in initiatives that do not threaten profits by avoiding intervening on so-called problem gamblers who contribute the majority of industry revenue (Fiedler *et al.*, 2021).

THE IMPACT OF GAMBLING MARKETING ON YOUNG PEOPLE

Table 1 summarizes evidence about the impact of gambling marketing on children and young people. Multiple forms of marketing play a role in positively shaping, influencing and normalizing young people’s gambling attitudes and future consumption intentions.

Gambling content that appeals to children and young people

The increasing sophistication of marketing has influenced the content of material, often making it especially appealing to young people, as with the appeal to constructs of sports-specific knowledge, skill, masculine prowess and even fan loyalty (McGee, 2020). A content analysis of Canadian lottery advertisements found that most ads portrayed positive emotions and outcomes such as excitement, thrill, winning, humour (McMullan and Miller, 2009). Pitt *et al.* identified a range of strategies used within sports betting advertising that may specifically appeal to young people,

including music, colours, voiceovers, humour and characters and celebrities (Pitt *et al.*, 2018). This work was extended by Nyemcsok *et al.* (2018) who found that young people perceived that inducement marketing (such as free bets) and celebrity endorsements were perceived as the most influential forms of marketing.

Exposure and recall

Researchers have demonstrated the nature and extent of children’s exposure to gambling products. For example, a 2015 study from New Zealand using wearable cameras found that children aged 11–13 were exposed to 6.9 episodes of gambling marketing per day in community environments, most frequently for lotteries and instant scratch tickets (Smith *et al.*, 2020). It is important to note that this study did not capture online marketing, and so is likely to be a significant underestimate of young people’s exposure to all forms of marketing. Research from the UK’s Advertising Standards Association also found that exposure of children even aged 15 and under increased from 2.5 to 4.0 advertisements per week during a 7-week period during a COVID-19 lockdown in 2020, largely as a result of increased Bingo and Lottery ad exposure (ASA, 2021a).

Children and young people are very aware of gambling marketing, recalling promotions across a range of marketing channels, including on television, through digital platforms, community environments and at sporting events (Pitt *et al.*, 2016b; Thomas *et al.*, 2018a; Djohari *et al.*, 2019). They also recall different types of marketing within these platforms, including on hoardings, jersey sponsorship, through commentary announcements in sporting matches, pop-ups and humorous videos on social media sites (Pitt *et al.*, 2016b; Thomas *et al.*, 2018a). Children also recall seeing gambling marketing after advertising watersheds (Thomas *et al.*, 2018a). These findings relating to recall of different forms of gambling marketing are important, given that government policy, and self-regulatory proposals from industry mostly cover commercial break advertising (Australian Communication and Media Authority, 2021).

Brand awareness

Children have clear recall of gambling brands and are able to recall multiple brands (Thomas *et al.*, 2016b; Nyemcsok *et al.*, 2018), even recognizing the imagery when the brand names are obscured (Nyemcsok *et al.*, 2018), e.g. identifying colours associated with a gambling brand, or linking specific marketing appeal strategies (such as humour) to a specific brand (Pitt *et al.*, 2017b; Nyemcsok *et al.*, 2018). They can describe plot lines and appeal strategies within advertisements including humour, celebrities, voiceovers and

Table 1: Examples of evidence relating to the impact of gambling marketing on children (under 18 years of age)

| Category | Evidence |
|---|--|
| Gambling marketing content that appeals to young people | <ul style="list-style-type: none"> • Celebrity endorsements—particularly the use of athletes and sporting personalities. • Humour • Inducements and risk reducing promotions. • Winning • Music, jingles and catchy voiceovers. |
| Exposure and recall | <ul style="list-style-type: none"> • Most young people can recall seeing gambling marketing. • Most commonly recall marketing on television, during sport and on social media. • Can recall specific examples of different types and placement of marketing strategies. |
| Brand awareness | <ul style="list-style-type: none"> • Can name multiple gambling brands. • Have demonstrated a depth of knowledge and awareness by recalling brand colours, specific promotions and advertisements. |
| Perceptions and approval | <ul style="list-style-type: none"> • Perceive gambling is a normal or common part of sport due to the marketing that they observe. • Gambling attitudes are positively influenced by marketing aligned with sport. • Influenced by portrayals of gambling as fun, social and easy way to win money. • Inducement marketing reduced perceptions of risk associated with gambling products. • Celebrity endorsement increases trust of brands and the markets that are offered. |
| Gambling intentions and engagement | <ul style="list-style-type: none"> • Indicate wanting to try gambling in the future. • Marketing and promotions, perceived knowledge of sport, alignment with culturally valued activities, and family and peers influence consumption intentions. |
| Support for restrictions | <ul style="list-style-type: none"> • Support curbs on gambling marketing. • Support education campaigns to explain risks of gambling and gambling products. • Are sceptical of responsible gambling initiatives. • Perceive that governments and sporting organizations have responsibility in protecting young people. • Are sceptical that industry will implement meaningful measures to protect young people. |

brand-specific promotions—often repeating verbatim the dialogue and taglines attached to campaigns (Pitt *et al.*, 2017b; Nyemcsok *et al.*, 2018). Some can also match gambling brands correctly with the football teams that they sponsor (Bestman *et al.*, 2015; Thomas *et al.*, 2016b). Sponsorship is particularly problematic because children do not always understand that this is a form of marketing. Evidence also shows that some young people perceive that sponsorship has a role in helping sporting teams, thereby portraying gambling companies in a positive light (David *et al.*, 2020). This perception of sponsorship is concerning as it may increase trust and soften the perception of risk associated with gambling (Pitt *et al.*, 2016a).

Perceptions and approval

Some types of marketing strategies appear to have an influence on young people's positive perceptions and approval of gambling. Children are particularly positively influenced by gambling marketing aligned with sport (Pitt *et al.*, 2017b). As with adults (McCarthy *et al.*, 2020), some young people believe that gambling on sport makes people more invested in the game, and more committed sports fans (Pitt *et al.*, 2016a). Young people also observe that gambling is depicted as a fun, social activity, where lots of people are shown winning (Pitt *et al.*, 2016a, 2017b).

More broadly, inducement marketing appears to have a favourable influence on young people's attitudes towards betting, and in particular their perceptions of the risks associated with betting (Nyemcsok *et al.*, 2018). Inducements and celebrity promotions are particularly likely to encourage young people to believe that gambling is a 'risk free' activity, with celebrity endorsements of gambling contributing to children's trust of gambling brands (Pitt *et al.*, 2016a; David *et al.*, 2020).

Gambling intentions and behaviours

Pitt *et al.* found that over 60% of young people indicated that they wanted to try gambling either now or in the future (Pitt *et al.*, 2017a). One fifth of young people in a study by Nyemcsok *et al.* (2018) expressed an intent to gamble once they were 18 years. Consumption intentions have been driven by gambling being aligned with culturally valued events, perceptions of knowledge or skill, marketing that encourages gambling as fun and risk free, and perceptions of future influence by family and friends (Pitt *et al.*, 2017a; Thomas *et al.*, 2018a). Young people who did not think they would gamble mostly held that view because they were cautious about losing money or because they had negative attitudes towards gambling, thinking that it was a waste of money.

Support for restrictions on gambling marketing

Children and parents generally support strategies aimed at restricting gambling marketing, especially those that remove gambling marketing from sport, implement strong restrictions on other forms of marketing; and use education to counter-frame commercial messages about gambling (David *et al.*, 2020; Nyemcsok *et al.*, 2021). Parents have also expressed support for regulations that protect young people from being exposed to gambling marketing on newer platforms such as social media (Djohari *et al.*, 2019). Young people have been critical of ‘responsible’ or ‘safer’ gambling messages—which they perceive are designed to absolve the gambling industry and governments from their own responsibility for harm prevention (Pitt *et al.*, 2022). Young people have also articulated strong messages in relation to sporting organizations and other stakeholders who they believe should be protecting young people from gambling marketing. This has included being critical of sporting organizations’ sponsorship relationships with gambling companies (Thomas *et al.*, 2016a). Some young people have also expressed doubts about the commitment of sporting organizations and governments to restrict marketing because of the financial incentives involved (David *et al.*, 2020).

A FRAMEWORK FOR GOVERNMENT ACTION

Contemporary marketing of gambling products is pervasive and growing, and is increasingly recognized as a matter of concern, particularly given mounting evidence that harm can occur at all levels of gambling engagement (Muggleton *et al.*, 2021). Changes to the modern media landscape and the novel modalities with which gambling companies market their products require new regulatory approaches. Current gaps in measures to control the reach of gambling marketing, including across LMICs where market expansion and diversification has been rapid, need to be addressed. Much can be learned from other harmful industries, particularly in relation to the way that these industries and their commercial partners seek to deny, downplay and delay action, including through the funding of research favourable to their interests (Cassidy *et al.*, 2013; Adams, 2016). This also includes misleading claims about the evidence on the impacts of advertising, while the companies and industries present themselves as ‘socially responsible’ through the implementation of self-regulatory codes and industry-sponsored education programmes (van Schalkwyk *et al.*, 2021a).

Finally, while recognizing that the industry will work hard to circumvent it, the evidence in this paper justifies suggesting a total ban on commercial advertising for

gambling, as occurs with tobacco in many jurisdictions, and this should at least be discussed. Primary responsibility for action to protect children and young people rests with governments. Applying the broad principles associated with the United Nations Convention on the Rights of the Child, we recommend the following principles to guide government action:

1. Governments should adopt the approach taken in Article 5.3 of the WHO Framework Convention on Tobacco Control and its Guidelines, ensuring that public policy on gambling should be protected from the ‘commercial and other vested interests’ of the gambling industry ‘to the greatest extent possible’ (World Health Organisation, 2003, 2013). This should ensure that the gambling industry plays no part in developing or implementing controls on its marketing activities, and that there is no governmental support or endorsement for gambling industry CSR and ‘education’ programmes.
2. Governments should recognize that there is consistent experience with many harmful products that voluntary curbs and self-regulation are ineffective, used to prevent or delay regulation, and at times counterproductive. Policymaking should thus recognize that, like other harmful industries, the gambling industry has consistently shown that it does not behave in a socially responsible manner, as revealed in high-profile inquiries into the conduct of major casino operators in Australia, substantial fines issued by the UK gambling regulator for failures by gambling companies to protect consumers, and examples of breaches of advertising codes. This further demonstrates the need to question whether governments should enable the gambling industry to fuel demand for their products through a permissive approach advertising legislation.
3. Regulations on marketing for gambling should be implemented with the primary aim of preventing forms of commercial gambling marketing that may reach children and young people.
4. Regulatory efforts should be overseen by a genuinely independent body (i.e. free from gambling industry influence), established by governments, and supported with adequate resources and appropriate penalties for infringements.
5. Governments should recognize that some groups, e.g. sporting organizations, may be concerned about the financial disadvantage associated with curbs on gambling marketing. Governments should identify sustainable and ethical ways of funding sports and other public services and activities that do not rely on maintaining the profitability of harmful industries.

6. The content of marketing campaigns must also be subject to rigorous independent evaluation and monitoring to effectively track industry tactics and safeguard against misleading messaging.
7. Regulation should cover all forms of promotion across multiple time slots and marketing channels, and be proactive, and flexible, to take account of new and analogous markets. Without this approach, companies may simply shift and adapt to alternative modes of promotion (e.g. responding to time limited curbs on television spot advertising by shifting to different time slots, increasing sponsorship and stadium and boundary marketing).
8. Any regulatory efforts to protect children from gambling marketing should be part of a comprehensive approach to the prevention of gambling harm—but development of other components of this approach should not be used as an excuse to delay action on a current and growing threat to the health and wellbeing of children and young people.

CONCLUSIONS

Children and young people are potential customers for the gambling industry. The lack of comprehensive curbs on all forms of gambling marketing suggests that governments and regulatory authorities in countries such as Australia and the UK, have decided that the costs associated with exposing young people to gambling marketing are outweighed by the benefits they perceive to be derived by certain stakeholders from a thriving gambling market. These include not only the gambling industry, but other businesses with vested interests in gambling marketing revenue, such as sporting codes via sponsorship and broadcasters via advertising revenue. Far-reaching curbs on marketing must be part of a comprehensive public health approach to gambling harm prevention. Limited regulation, for example solely focused on commercial break advertising, is unlikely to have a significant impact on children's overall exposure to advertising. We would also anticipate, on the basis of experience and evidence from other areas of public health such as tobacco and alcohol, that if we *only* regulate television advertising, more advertising will continue to emerge on digital platforms as companies seek to circumvent regulations. This is why comprehensive curbs on marketing that are designed to protect children must take into account all forms of contemporary marketing across all channels. Effective measures to protect children and young people from gambling marketing will inevitably be opposed by the gambling industry and its allies but are based on a weight of evidence and experience over time and across a range of industries. They represent an important step towards building environments in

which children and young people can enjoy the highest attainable standard of health.

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