

GENERAL SYNOD

Advertising and Gambling

Summary

The Church of England, working with other denominations, has been prominent in calling for better acknowledgement in public policy of the harms that gambling causes. Gambling advertising, has become a major public concern, because it is seen to be everywhere.

There is strong evidence that gambling advertising does influence people, not least those who are already problem gamblers. The regulation of gambling advertising is developing well, but there are still wholly inappropriate advertisements which slip through the net.

The relation between sport and gambling, which has become very strong with almost half of Premiership football clubs having shirt sponsorship, is a particular concern. Betting has become an integral part of the activity of watching sport, for many people. The recent voluntary ban on TV advertising in-play before the watershed is welcome, but may only move more advertising online.

In November, we were told that there are 55,000 children who are problem gamblers. There is strong evidence of harm to children, and parts of the industry are targeting them, partly through child-friendly branding and the growth of gambling-like content in gaming products.

Almost everyone now agrees that research, education and treatment in this area must be funded, since it is a mainstream public health matter, by public funds; in other words, by a levy rather than voluntary contributions from the industry.

There are many opportunities for churches to support problem gamblers, and education across all ages. Resources are available, nationally and online.

The Church of England and the advertising of gambling

1. Towards the end of 2017 the Government issued a consultation on a range of gambling issues. On advertising, the Mission and Public Affairs Council responded in January 2018, criticising the lack of concrete proposals, giving a qualified welcome to a large two-year safer gambling advertising campaign, and criticising the Government's implication that, because one 2014 study held that it was difficult to say whether advertising had much effect, the evidence base was thin. The MPA Council said, 'There is clear evidence that gambling advertising, and promotions, are dangerous for problem gamblers.'

The quantity and pervasiveness of gambling advertising

2. Concern about the amount of gambling advertising on television came to a head during last year's World Cup, when almost 90 minutes of it was shown on one channel during the period when England were in contention: the commonest kind of advertisement in that period. TV advertising, deregulated 10 year ago, is allowed after the 9pm watershed, and at other times during live sport. In a study 95% of TV ad breaks during live UK football matches featured at least one gambling ad and in the worst cases one in three ads was for a gambling company. TV advertising is not, however, the main issue. Five times as much money is spent on gambling marketing online as on TV, and the amount spent promoting gambling on social media has more than tripled over the past three years.

3. The first major academic study into the impact of the deregulation of gambling advertising is still in progress.¹ Recent research has shown that online gamblers are influenced by gambling advertising. One-tenth of Internet gamblers reported that marketing and promotions were critical to their initial uptake and 29% reported increased online gambling expenditure as a result of viewing promotions.
4. Gambling advertising can have particularly negative impacts on problem gamblers². Compared to other gamblers, problem gamblers report advertisements as being a greater stimulation to gamble, a larger influence on spending more than intended, and an encouragement to think they can win. Bonus offers for sports betting, such as money-back guarantees and "free" bets that require matching deposits appear to increase internet gambling, especially among problem gamblers.
5. In a 2014 study, advertisements and promotions invoked urges to gamble among treatment-seeking gamblers, and appeared to some participants to be designed to target individuals who had taken steps to limit or cease gambling. It is welcome that Sky has recently announced a reduction in betting advertisements, with one gambling ad in each commercial break. It is also introducing AdSmart, a technology which enables viewers to block gambling advertising. Research shows that the frequency and timing of gambling advertising – especially late at night when people with mental health problems are vulnerable and more likely to respond – can create challenges to gambling responsibly.
6. Gambling advertising is carefully regulated by the Advertising Standards Authority and associated bodies; new guidelines were issued in 2018, including a focus on 'tone'. The need for regulation is illustrated by the fact that in 2017 the ASA banned ads which suggested a man could fund his wife's cancer treatment by betting online. This month British Airways was forced to withdraw an advertisement showing a couple returning to their room via what appears to be a hotel casino after a swim, celebrating a slot-machine win.

Sport and gambling

7. The issues of sports sponsorship by gambling companies are acute. In Australia, gambling advertising was banned during live sport broadcasting in July 2018. Italy banned all gambling advertising on television in the same month. In the UK in December 2018, the Industry Group of Responsible Gambling, the industry body for the online gambling industry, agreed a voluntary ban during broadcast of sports events, and five minutes before and after the broadcast.
8. Sports advertising, including shirt sponsorship, affects all television channels. In a study of three episodes of the BBC's Match of the Day, researchers found that gambling logos or branding appeared on screen for between 71% and 89% of the show's running time. This season, nine out of the 20 Premier League clubs have a gambling company as their main shirt sponsor, and 17 out of the 24 Championship

¹ Being carried out by the university of Stirling and Ipsos Mori, due to report 2019.

² A 2017 [report by the Gambling Commission](#) estimates that the number of over-16s deemed to be problem gamblers has grown by a third in three years to around 430,000 people, although the rate of problem gambling is "statistically stable" at 0.8% of over-16s. More than two million are now estimated to be problem gamblers or at risk of addiction.

clubs. SkyBet sponsors the Football League and its three divisions, and is promoted by Sky during sports TV coverage.

9. Dr Darragh McGee of Bath University has spent two years with football supporters in Bristol and Derry. He reports: "Far from being the knowledge-based, risk-free activity it is marketed as, the profound appeal of online sports gambling has had dire consequences for many young men," A 27-year old said "Now, I'm sat there thinking about what I should be betting on, or asking the boys who the smart money's on tonight. At times, I end up betting against United just to make it interesting! I can't remember the last time I just watched the game like a real fan, without having a bet on it."

Levels of gambling by children

10. A recent study by the Gambling Commission found that the number of children with a gambling problem has quadrupled in two years; the number of problem gamblers aged 11 to 16 has reached 55,000. The Bishop of St Albans was quoted at the time as saying, 'We need to start taking the dangers of gambling seriously - 55,000 children classed as problem gamblers is a generational scandal.' The study also found that 70,000 youngsters were at risk and 450,000 children bet regularly - the equivalent of one in seven children aged 11 to 16. Young people studied staked an average of £16 per week on fruit machines, bingo, betting shops and online - all of which are all illegal for under-18s.
11. Research has shown that young people have high exposure to gambling advertising and may be particularly influenced by it. They are aware of and can recall specific slogans and jingles and may feel they are being groomed to gamble. Further, advertisements can increase adolescents' desire to experiment with gambling and prompt a gambling session. Greater media exposure to gambling advertisements and promotions has also been associated with more positive youth gambling attitudes and intentions towards gambling.
12. Children are at risk from online gambling. In October 2017 online operators had to be warned not to post ads that were likely to appeal to under-18s, and freely accessible. These included 'particular colours, cartoon and comic-book images, animals ... and names of games such as 'Piggy Pay-out', 'Fluffy Favourites', 'Pirate Princess' and 'Jack and the Beanstalk'. In August 2018 the ASA ruled against images in gambling advertisements along with the names "Fairy-tale Legends Red Riding Hood" and "Fairy-tale Legends Hansel and Gretel".
13. In a November 2018 survey, the principal forms of gambling in the past week among 11-16s were placing a private bet for money with friends (6%), National Lottery scratchcards (4%), fruit/slot machines (3%) and playing cards for money with friends (3%). Habits of gambling are being formed across many types of activity, by no means only online. In the same age range, 31% have ever opened loot boxes in a computer game or app, to try to acquire in-game items, while 3% claim to have ever bet with in-game items (so called 'skins' gambling). This although 59% of the young people agreed that gambling is dangerous and only 14% agreed that it is OK for someone their age to gamble.
14. The Gambling Commission is working towards better age verification checks – but wider action is also needed. For example, pubs often fail to stop children playing on

18+gaming machines. And the UK has more permissive rules allowing children to play on some types of machine than many other countries.

Mandatory levy for independently commissioned research, education and treatment programmes

15. GambleAware is the main body commissioning research, education and treatment. It is funded by a voluntary levy of 0.1% of revenue. This amounts to less than £10m a year. Education and treatment are not consistently delivered across the country; the Gordon Moody Association has two residential treatment centres (in the South East and West Midlands) and online support, while the National Problem Gambling Clinic is at Earls' Court. GamCare offers phone and online support. There is an increasing move to see problem gambling as a public health issue, and realistic funding could underpin a proper service available around the country. Addressing the harm that gambling causes to many people should not be a matter of a small voluntary whip-round from the industry; and research, education and treatment should not be commissioned by a body voluntarily funded by the industry. The independence of research thus commissioned, for example, will always be in doubt.

Support by churches for people who have problems with gambling, and for education initiatives

16. There are great pastoral opportunities for churches to give support to those who may have problem gambling problems, and to foster open conversation about the issues. There are online resources and online advice services to which people can be signposted, and local branches of Gamblers Anonymous.

17. There are some small but growing education providers such as YGAM, the youth gambling education trust. Demos and GambleAware have trialled and published a set of three lesson plans for PHSE³. Work is being done with the players and staff of the 72 EFL football clubs, to educate them about gambling harms. Churches can find out what is happening in their local area, and offer support; they can encourage schools to use the material that is available for PHSE.

18. The Gambling Commission in November 2018 found that only 19% of children said their parents had set strict rules about gambling. 49% of respondents said that someone had spoken to them about the problems that gambling can lead to, with the conversation typically taking place with a parent (40%) or teacher (21%). There is great scope for churches to give parents confidence in giving informed guidance to their children about gambling, and in setting appropriate rules.

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³ available at <https://www.demos.co.uk/wp-content/uploads/2018/03/Gambling-Education-Teaching-Resource-Booklet-1.pdf>