WHAT ARE THE ODDS?

The Appeal of Gambling Adverts to Children and Young Persons on Twitter

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University of BRISTOL

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EXECUTIVE SUMMARY

The Gambling Act 2005 deregulated the gambling market in Great Britain and opened the door to advertising for sports betting and online casinos. 16 years later, more 16-34-year-olds gamble than any other age group[1] and 55,000 children aged 15 and under have a gambling addiction[2].

Advertising has a part to play.

Advertising codes state "Gambling marketing must not be of particular appeal to children and young persons" – but no one has investigated what "appeal" means for them.

This research with 210 children (11-17-year-old); 222 young persons (18-24-year-old); and 221 adults (25-78-year-old) investigates **for the very first time** whether gambling advertising appeals more to children and young persons or adults. We chose to study Twitter advertising as social media advertising is particularly problematic.

The results show that gambling advertising on Twitter is strongly and significantly more appealing to children and young persons than to adults.

Esports adverts and those using **content marketing** are especially appealing, triggering happiness, excitement and delight in under 25-year-olds.

The Gambling Act 2005 is currently under review and we have six recommendations.

Five calls to action for regulators:

- Ban esports gambling advertising – it automatically appeals to children and young persons.
- Clarify and tighten regulations for content marketing – it works on children and young persons by stealth.
- Find out what other advertising features appeal to children and young persons by asking them directly and frequently.
- Use their answers to establish clear and continually updated criteria for the features advertisers must avoid.
- Expand the definition of a "young person" in the advertising codes from 16-17 to 16-24.

One call to action for social media platforms:

- Only serve up gambling ads on social media when users actively opt-in to receive them.

KEY FINDINGS

FINDING 1

Children's and Young Person's Exposure to Gambling Advertising is Extremely High

45.2% of 11-17-year-olds and 72.4% of 18-24-year-olds said they see gambling advertising at least once per week on their social media feed. A quarter of children (11-17) and adults (24-78) and an enormous one third of 18-24-year-olds said they are exposed to gambling adverts on social media every day.

FINDING 2

Gambling Advertising on Twitter is Strongly and Significantly More Appealing to Children and Young Persons than Adults

Across a range of categories, gambling adverts are strongly and significantly more appealing to children and young persons than to adults. 19 out of 24 gambling ads were more appealing to children and young persons than adults. 18-24-year-olds find gambling advertising more appealing than other age groups.

FINDING 3

Gambling Ads Trigger *Positive* Emotions in Children and Young Persons, and *Negative* Emotions in Adults

15 out of 24 gambling adverts triggered positive emotions such as "excited", "happy" or "delighted" in children and young persons. In stark contrast, only 7 out of 24 ads triggered positive emotions in adults. **Adults are four-times more likely than children and young person to have intense negative emotions** such as "distress", "anger", or "tension" when exposed to Twitter gambling advertising.

FINDING 4

Gambling *Content Marketing* is Almost Four-Times More appealing to Children and Young Persons than to Adults

Gambling content marketing is 3.9-times more appealing to children and young persons than adults. 11 out of 12 gambling content marketing ads triggered positive emotions in children and young persons – only 7 did for adults.

FINDING 5

Esports Gambling Advertising is Strongly and Significantly more Appealing to Children and Young Persons than to Adults

Esports gambling advertising was significantly more appealing to children and young persons than to adults. Adults are four-times more likely to feel intense negative emotions about esports gambling adverts than children and young persons.

FINDING 6

The Current Committee of Advertising Practice (CAP) Codes Don't Work

The current gambling advertising regulations set by CAP fail to identify and thus stop gambling ads that really appeal to children and young persons. The adverts most appealing to children in our research would not breach current CAP codes.

KEY RECOMMENDATIONS

Recommendations for Regulators

RECOMMENDATION 1

Ban All *Esports* Gambling Advertising

Esports gambling advertising is dramatically more appealing to children and young persons than to adults – who find it very unappealing. As most esports fans are under 30 anything related to esports – including gambling – has an almost inherent appeal to children and young persons. It is even questionable whether esports gambling advertising can ever **not be** of strong appeal to youth. Esports betting advertising should thus be banned.

RECOMMENDATION 2

Clarify and Tighten Gambling *Content Marketing* Regulations

Content marketing is strongly appealing to children and young persons but it works by stealth. The ASA does not acknowledge content marketing as advertising and considers it outside remit. This should be rectified. We recommend that all content marketing ads are clearly labelled as ads to signal commercial content to users and that new, strict regulations are introduced.

RECOMMENDATION 3

Ask Children and Young Persons Directly and Frequently What Appeals to Them

That gambling advertising is appealing to children is a serious issue. However, regulators have never asked children and young persons what actually appeals to them. We strongly recommend that the ASA includes children and young persons when evaluating complaints, and that the CAP uses our appeal test ongoing and when creating guidance or new codes.

RECOMMENDATION 4

Use Children´s and Young Person´s Answers to Urgently Review Guidelines for What Advertisers Must Avoid

The current CAP guidance for advertising features appealing to children is unclear and highly subjective – making it almost impossible for advertisers to stick to the rules. We recommend that, using answers from children and young persons, the criteria for "strong appeal" are very clearly articulated within the revised CAP code with **specific examples of images and text considered of "strong appeal"**.

RECOMMENDATION 5

Expand the Definition of "Young Persons" in CAP from 16-17 to 16-24

CAP use the terms *children* for anyone aged 0-15 and *young persons* for anyone aged 16 and 17. As 18-24-year-olds found gambling adverts more appealing than other age group we recommend that CAP extend the definition of "young persons" to 18-24-year-olds to ensure their protection, too.

Recommendation for Social Media Platforms

RECOMMENDATION 6

Only Serve Up Gambling Ads on Social Media When Users Confirm They Recognise It and Want It

We recommend that social media companies use tools to ensure that people only see gambling ads when they recognise and want to. This could be done by using a *Sensitive Content* tool, where users only see an ad after confirming that they recognise it as advertising and want to see it. Instagram has recently introduced such a tool.

BACKGROUND

The Reinvention of the Gambling Industry

With the introduction of the Gambling Act 2005, GB deregulated the gambling market and opened the door to advertising for sports betting and online casinos. 16 years later, 47% of the UK adult population have participated in gambling in the past four weeks and adults classified as problem gamblers make up 0.5% of the UK population – 340,000 individuals[1].

There has been a steady five-year increase in 16-24-year-olds who have gambled during the past four weeks, from 33% to 40%[1]. The trend for those over 45 is the reverse. **Thus, gamblers in the UK are becoming younger. 16-24-year-olds and 25-34-year-olds now form the two largest age groups in non-lottery gambling activities.**

It is not surprising that the number of UK children with gambling problems has quadrupled to more than 55,000 in just three years[2]. These trends are alarming as children and young persons are particularly susceptible to the development of severe gambling problems and, therefore, represent a vulnerable high-risk group[3].

Three developments seem to have propelled the high share of young gamblers:

The Rise of Social Media Ads

The UK gambling industry has increased its marketing spend by 56% since 2014 to £1.5bn. Its marketing budget is now seven-times higher than Proctor & Gamble's. 84% of this massive annual budget is going into online strategies[4]. A recent study[5] into the volume of UK gambling adverts on Twitter found that the five largest brands – Ladbrokes, Bet365, Coral, Betfred, and Paddy Power – sent 19,100 tweets within 9 months, or 78 each per day. Such a bombardment on social media raises serious concerns as these platforms are populated by a relatively young demographic: 18-24-year-olds make up 51.8% of all Twitter users[6].

The CEO of the UK Advertising Standards Authority (ASA) publicly admitted that methodological challenges render it highly complex for his organisation to identify whether online and social media gambling advertisers are targeting children and young persons or, indeed, even ascertain the volume of this advertising to which they are exposed[7].

The Advent of Esports Betting

Gambling in the 20th century focused on bingo and casinos, amusement arcades, and sports. Today online bookmakers accept bets on almost anything. A particularly fast-growing new trend is esports gambling. Esports is the industry surrounding the professional competitive playing of computer games online. Games include Counter-Strike: Global Offensive, Fortnite, Defence of the Ancients and FIFA. The industry's market revenue is forecast to reach $1.1 billion in 2021[8]. Global audience reach was estimated to be 474 million people in 2021 – most of them children and young persons.

Conventional bookmakers (such as Bet365) have responded by offering esports bets and new dedicated esports betting internet sites (e.g. Midnite) have emerged. The esports betting market is predicted to be worth $205 billion by 2027[9]. So far, this development has been almost entirely under the radar of public discourse, research agenda and policymaking although its potential effect on children may be huge.

Content Marketing

Content marketing is a relatively new advertising technique. It is described as "developing stories that inform and entertain and compel customers to act – without actually telling them to"[10]. Most content marketing aims to elicit emotions and does not have a call to action. It often includes humorous pictures, funny stories, or showing enticing places to travel to. By purposely excluding any relationship or link to the product, such efforts are not clearly identifiable as advertising. They are likely to affect recipients subconsciously bypassing protective scepticism. It is stealthy. For children who have less developed advertising recognition skills this is a serious concern. Our recent study of 888k UK gambling ads found that 40% of those ads were content marketing and that children liked, shared or commented on them – highlighting a distinguishing feature of social media content: *shareability*[11].

The rise of social media ads, esports betting and content marketing has helped reinvent the gambling industry but raises serious concerns about harms to children and young persons and whether regulations still work.

Regulation of Gambling Ads

Policymakers are increasingly worried about the impact of social media gambling adverts on children, too. Whilst (social media) gambling advertising is legal in the UK, the rules are self-regulatory and laid out by the Committee of Advertising (CAP) and policed by the Advertising Standards Authority (ASA).

As a result of increasing pressure since a publication by IpsosMORI[12], into the effect of gambling advertising on children and young people – the CAP launched a consultation into "strengthening rules and guidance for gambling ads to protect children and young people"[13]. A substantial part of this consultation focuses on whether in the wording of CAP Code 16.3.12 "**Gambling marketing must not be of particular appeal to children and young people**", the word *particular* be replaced with the word *strong.*

In our previous research we found that in 21% of cases, it was not clear (to adult evaluators) whether gambling ads were "of **particular** appeal to children". Published guidance by CAP is often vague and rather subjective. This creates serious issues for gambling advertisers who want to follow current regulations but are just not clear how this can be achieved.

However, the minor change from *particular* to *strong* appeal is unlikely to solve this issue. It seems that the wording of such a code is less important than providing unambiguous criteria and examples to give advertisers the necessary understanding of what is deemed as being appealing to children and young persons.

Currently, the *adult* ASA enforcement team judge what is appealing. These rulings are then used as precedent to stipulate whether certain advertising features (e.g. a picture of Santa Claus in gambling advertising) break the rules. It is highly questionable, however, if adults know what appeals to children. Children and young persons have different structures in their brains, which leads to perceptions and behaviour different to adults[14].

Previous research has investigated perceptions of and attitudes towards gambling advertising which could infer a potential "liking" of certain types of adverts but none has considered appeal as a complex emotion-like state[15] [16] [17] [18]. Emotions, however, are what drive consumption behaviour – as marketing and psychology research has concluded over the past 20 years.

This report presents new research that asks children and young persons themselves.

The study with 653 GB participants 210 aged 11-17; 222 aged 18-24; and 221 aged 25-78 investigates for the very first time whether, and what type of Twitter gambling advertising appeals more to children and young persons than to adults.

METHODOLOGY

An online survey with 210 children, 222 young persons and 221 adults was conducted to investigate their emotional responses to (and thus appeal of) gambling adverts on Twitter.

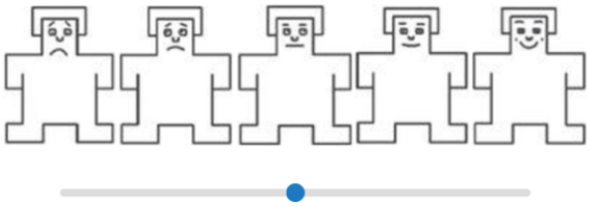
Research Design

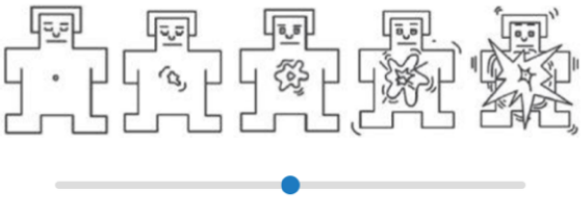
The research was conducted during the pandemic (May - July 2020) and therefore online. All 653 participants were exposed to 24 different Twitter gambling adverts (see next section for more details). **For each advert, the same three-slide loop was run:**

1. "Click on the blue arrow if you're ready to rate the next slide"

2. The participant saw a Twitter gambling advert on their screen for exactly six seconds.

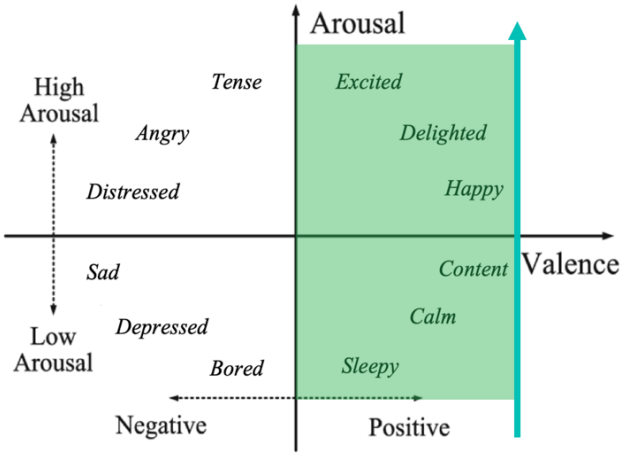
3. Two SAM (Self-Assessment Manikin)[19] scales automatically appeared. The participants had ten seconds to rate the advert before the scale automatically disappeared and the first slide appeared again. The first scale measured valence (how positive or negative the emotion elicited by the ad) and the second measured arousal (the intensity of emotion elicited by the ad).



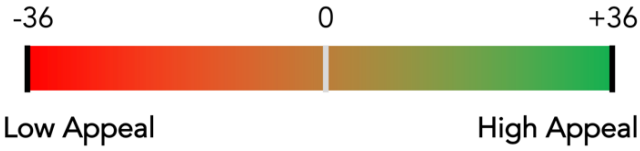


SAM was chosen because of its proven validity in previous academic research[20] and because it is easily applied online. Using pictorial manikins is superior to language-based emotion measurements because they are not reliant on words that are subject to different interpretations and depend on verbal communication skills which develop with age.

The valence and arousal dimensions, on which SAM is based, are commonly used to measure emotional reactions[21] (such as appeal) and allow a visualisation of emotions experienced by research participants. If an advert, for example, resulted in *positive-valence* and *moderately-high arousal* – it can be classified as *happy* (see valence-arousal plane below).



An appeal score is then calculated by multiplying the valence score (-4 to 4) with the arousal score (1 to 9) – leading to an appeal scale (see scale below). An advert was considered "appealing" if valence was positive (right side of the plane). The higher up on the right side, the more appealing the advert is to the participant.



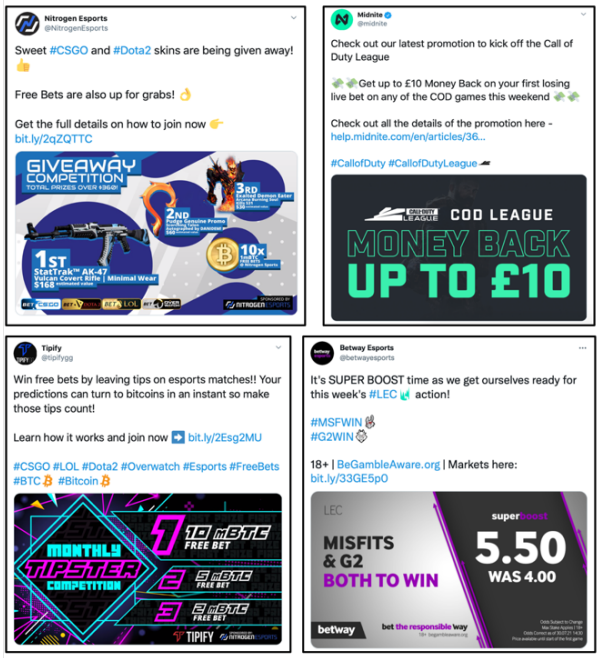
Twitter Adverts Used in the Research

Our research compared the reaction of children, young people and older adults to both **content marketing** and **conventional advertising** for both **esports** and **traditional gambling**. See grid below.

	Esports gambling	Traditional gambling
Conventional Advertising	6 adverts	6 adverts
Content Marketing	6 adverts	6 adverts

Esports gambling

Esports gambling relates to betting activities on the outcome of esports matches such as Call of Duty, Fortnite or DOTA.



Traditional gambling

Traditional gambling relates to betting on (traditional) sports such as football, rugby or horseracing, as well as online-casino related gambling activities.

Conventional advertising

Conventional advertising refers to advertising that has a clear call to action (e.g. Bet now or showing odds) or has an obvious relationship to the brand or the product.

Content marketing

Content marketing is an advertising technique that uses amusing or interesting content to engage users and build a positive long-term relationship with the brand.

Sample and Descriptive Statistics

Children were recruited via six participating secondary schools in south-west England. **Young People** and **Adults** were recruited via the online participant panel *Prolific*.

	Children (n=210)		Young Persons (n=222)		Adults (n=221)		All (n=653)	
Gender								
Male	98	(46.6%)	115	(51.8%)	106	(48.0%)	320	(49.0%)
Female	105	(50.0%)	107	(48.2%)	114	(51.6%)	325	(49.8%)
Other	0	-	-	-	1	(0.4%)	1	(0.2%)
Prefer not to say	7	(3.4%)	-	-	-	-	7	(1.1%)
Age								
11-13 Years	117							
14-17 Years	93							
18-20 Years			97					
21-24 Years			125					
25-34 Years					43			
35-44 Years					43			
45-54 Years					44			
55-64 Years					40			
> 64 Years					52			
Average Age	13.2 (11-17)		21.0 (17-24)		50.4 (25-78)		28.4 (11-78)	
Social media usage								
Not everyday	33	(15.7%)	7	(3.1%)	45	(20.3%)	85	(13.0%)
Once a day	21	(10.0%)	18	(8.1%)	36	(16.2%)	75	(11.4%)
2-9 times day	85	(40.4%)	87	(39.1%)	94	(42.5%)	266	(40.7%)
>9 times a day	64	(30.4%)	110	(49.5%)	45	(20.3%)	219	(33.5%)
How often do you see gambling advertising on social media?								
Once/twice a day	53	(25.2%)	83	(37.3%)	61	(27.6%)	197	(30.1%)
Once/twice a week	42	(20.0%)	78	(35.1%)	79	(35.7%)	199	(30.4%)
Once/twice a month	34	(16.1%)	33	(14.8%)	28	(12.6%)	95	(14.5%)
Once/twice a year	20	(9.5%)	10	(4.5%)	16	(7.23%)	46	(7.0%)
Never	54	(25.7%)	18	(8.1%)	36	(16.2%)	108	(16.5%)
Are You Aware of Esports Gambling? (Yes)	90	(42.9%)	120	(54.1%)	61	(27.6%)	271	(41.5%)
Problem Gambling Severity Index (PGSI)								
No-risk gamblers	-	-	169	(76.1%)	162	(75.5%)	331	(74.7%)*
Low-risk gamblers	-	-	31	(13.9%)	36	(16.1%)	67	(15.1%)*
Moderate-risk gamblers	-	-	15	(6.8%)	22	(10.0%)	37	(8.4%)*
Problem gamblers	-	-	7	(3.2%)	1	(0.4%)	8	(1.8%)*

* Only participants over 18 years were asked to fill out the PGSI (n=443)

RESULTS

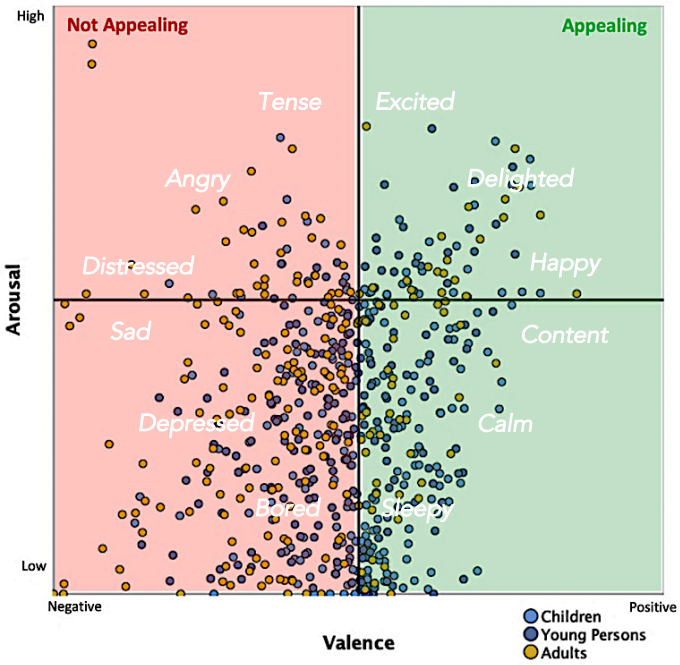
Overall Appeal of Gambling Adverts

The first analysis considered responses to **all** 24 gambling adverts combined.

Valence-Arousal Plane

Mapping the responses on the valence-arousal-plane shows more light-blue (children) or dark-blue (young persons) dots than yellow dots (adults) on the right-hand side. This indicates that children and young persons had more positive emotions towards the ads than adults. These range from low intensity positive feelings such as "content" or "calm" to high intensity positive feelings such as "excited" or "delighted". Most adults were in the bottom-left quadrant indicating that they felt "bored" or "sad" when looking at the gambling adverts.

Valence-Arousal Plane for All 24 Gambling Ads.



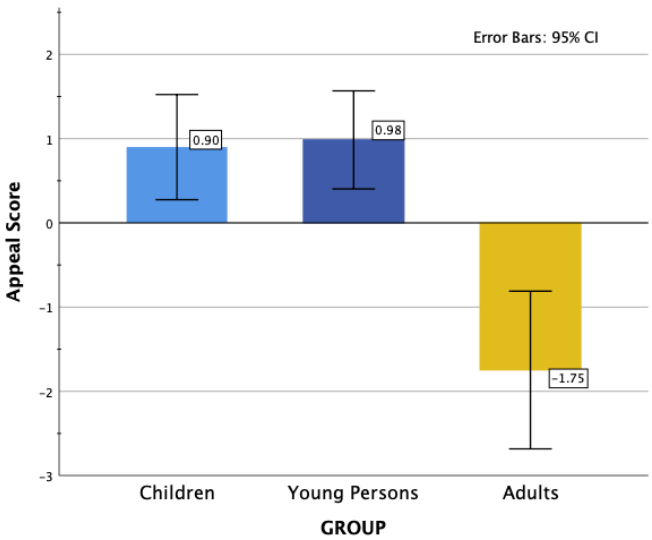
15 out of all 24 gambling adverts triggered positive emotions such as *happiness*, *calmness* or *delight* in both children and young persons. This is in stark contrast to adults where only 7 out of 24 ads triggered positive emotions.

Adults are four-times more likely than children and young persons to feel high intensity negative emotions such as *distressed*, *angry*, or *tense* when exposed to social media gambling adverts.

Appeal Scores

Mean appeal scores (valence times arousal) are shown in the bar-chart below. Children and young persons had a similarly high appeal score (0.9 and 0.98), while adults had a substantially lower score (-1.75). The difference between adults and children/ young persons is statistically significant ($p<0.001$) – meaning that **overall gambling advertising on Twitter is clearly of particular appeal to children and young persons and thus in breach of the code.**

Appeal-Score Bar Chart for All 24 Gambling Ads.



The second analysis breaks down appeal by the two forms of gambling (esports and traditional) and the two forms of advertising (conventional and content marketing). See below where green signals the most appealing forms and red the least.

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

Content marketing for traditional betting appeals to all groups but for esports gambling only to children and young persons.

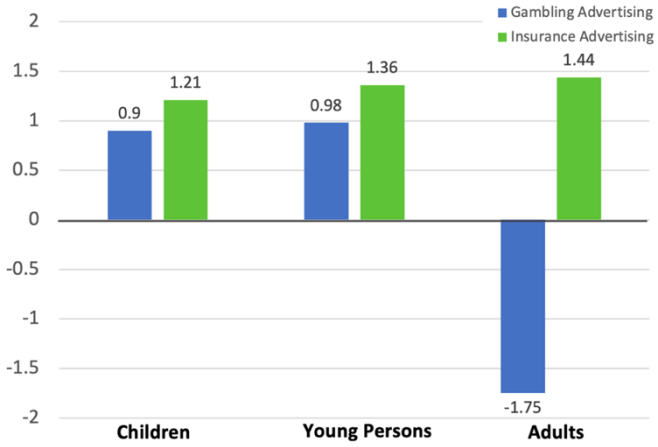
Importantly, **in all four forms of gambling advertising children and young persons have higher appeal scores than adults.** 19 out of 24 gambling ads were more appealing to children and young persons than adults. The largest differences were for esports – perhaps not surprising as the average age of esports spectators is currently 26 years. Apart from content marketing for traditional gambling the differences between children/young persons and adults was statistically significant.

How Young is Young?

Current gambling advertising regulations are designed to protect under-18s. However, our research found **that children (11-17) and young persons (18-24) have very similar appeal scores, whereas adults' scores differ significantly.** This is in line with neuropsychological insights suggesting that the brain is still forming up to around age 24[14].

To ensure that our findings were not down to a measurement issue deriving from children and young persons rating **any kind of advertising** more positively than adults, participants were also exposed to insurance adverts. There was no statistically significant difference between the appeal scores of the three age groups (1.21, 1.36, 1.44). Thus, no measurement problem was present – **there is something about gambling ads in particular that strongly and particularly appeal to the young.**

Appeal-Score Bar Chart Comparing Gambling and Insurance Ads.



In summary, the results show that all four types of gambling adverts on Twitter are of particular appeal to children and young persons and therefore in breach of current gambling advertising regulation.

The results for **content marketing** and **esports** gambling adverts are particularly striking.

These are explored in more detail in the following sections.

The Appeal of Content Marketing vs Conventional Advertising

The Advertising Standards Authority (ASA) does not acknowledge content marketing as advertising and considers it outside remit[22]. Yet, in a preceding study[5] we found that almost 40% of gambling adverts on Twitter were content marketing.

Little is known about how this technique affects persons or whether it works better on some age-groups than others.

In the present study we compared the reactions of our three groups when exposed to content marketing on the one hand and conventional advertising on the other.

The gambling content marketing examples in the study used humour, insider sentiments, memes and emojies – techniques that build a positive, emotional relationship between the brand and the user.

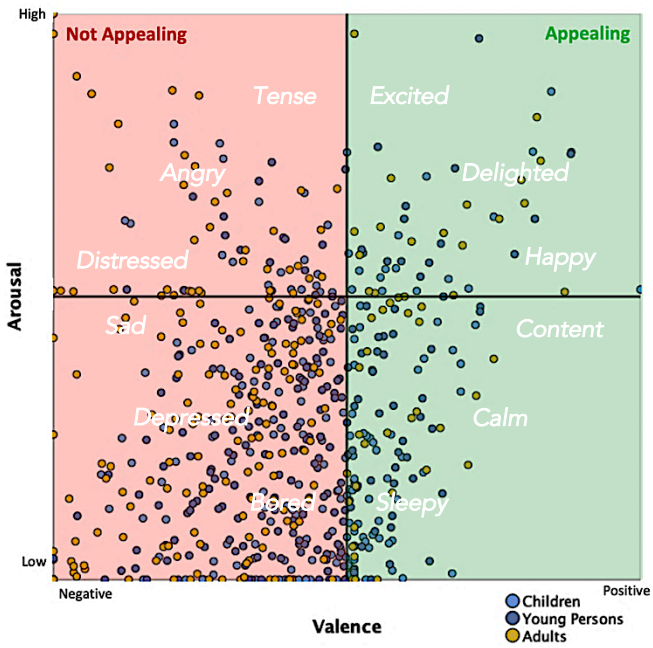
The conventional advertising examples used free bet offers, sign-on bonuses, odds or promoting sports-matches with a link to possible bets.

Valence-Arousal Plane

There were substantial differences in reactions to the two advertising techniques. **For conventional adverts** most dots are located in the bottom left quadrant which indicates low intensity negative emotions such as *sad*, *depressed*, or *bored*.

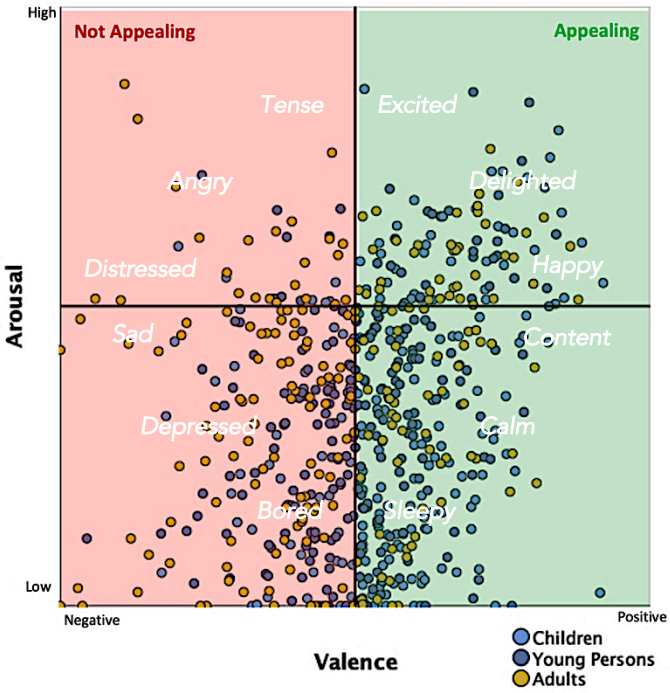
Moreover, more adults than children and young persons are located in the top left quadrant – representing intense negative emotions such as *tense*, *angry* or *distressed*: 18.2% (40 out of 221) adults are located here, as opposed to 8.5% (18 out of 210) children and 6.7% (15 out of 222) young persons. Adults clearly have more negative emotions towards conventional adverts than children and young persons.

Valence-Arousal Plane for Conventional Gambling Adverts



For content marketing (figure below) we see a very much higher concentration of all coloured dots in the right-hand quadrants showing that all participants had much more positive emotions towards content marketing than conventional adverts.

Valence-Arousal Plane for Gambling Content Marketing

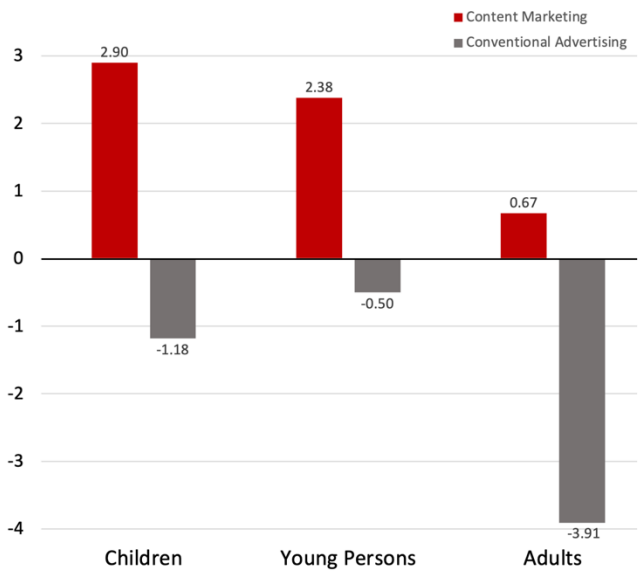


However, very many more children and young and dark blue dots (children and young persons) are on the right-hand side, showing that more children than adults feel positive emotions for content marketing.

On the other hand, the top left quadrant that indicates high intensity negative emotions is again mainly populated by adults. 23 adults but only 4 children and 8 young persons are in this quadrant, indicating that **three to six times as many adults have strongly negative emotions towards gambling content marketing as children or young person.**

Appeal Scores

The appeal scores (valence times arousal) are striking. Whilst for conventional advertising all age groups have negative appeal scores, for content marketing all groups have positive scores.



For both advertising forms, the appeal scores for children and young persons are again substantially higher than for adults. Indeed, **gambling content marketing is 3.9-times more appealing to children and young persons than to adults whereas conventional adverts are 4.7-times less appealing to adults than children and young persons.** The differences are highly significant ($p < 0.001$).

Both gambling content marketing and conventional gambling advertising are of particular appeal to children and young persons and in breach of the code.

11 out of 12 gambling content marketing ads were appealing to children and young persons – as opposed to 7 for adults.

➡ **Taken together the findings for content marketing are serious.** Children and young persons find the advertising particularly appealing when no obvious links to gambling are present. Content marketing may bypass the conscious scepticism people use to protect themselves from the steady bombardment of advertising messages. Children in particular may be unable to think, "This is an advert – they want to sell me something – they are not just other people on Twitter". This is problematic for any kind of advertising – but it is a serious issue for promoting products with highly addictive potential – like gambling.

We have repeatedly flagged up the issue of content marketing to the regulators (CAP and ASA), however, they have rejected our concerns arguing that "many of the items flagged in the research do not amount to 'advertising' as defined by the CAP Code (…) because they are editorial in nature"[23]. Their argument is based on the assumption that content marketing is not a form of advertising – a flawed argumentation which contradicts several advertising industry bodies such as the International Chamber of Commerce (ICC). Notably, even the Internet Advertising Bureau, representing the UK industry body for digital advertising – supported by the ISBA (the voice of leading UK advertisers), the Association for Online Publishers (AOP) and the Content Marketing Association (CMA) - have launched an updated guide for "content and native advertising" in 2018 where they stress that this type of advertising needs to "adhere to the CAP Code and all other relevant legislation"[24].

The Appeal of Traditional vs Esports Betting Ads

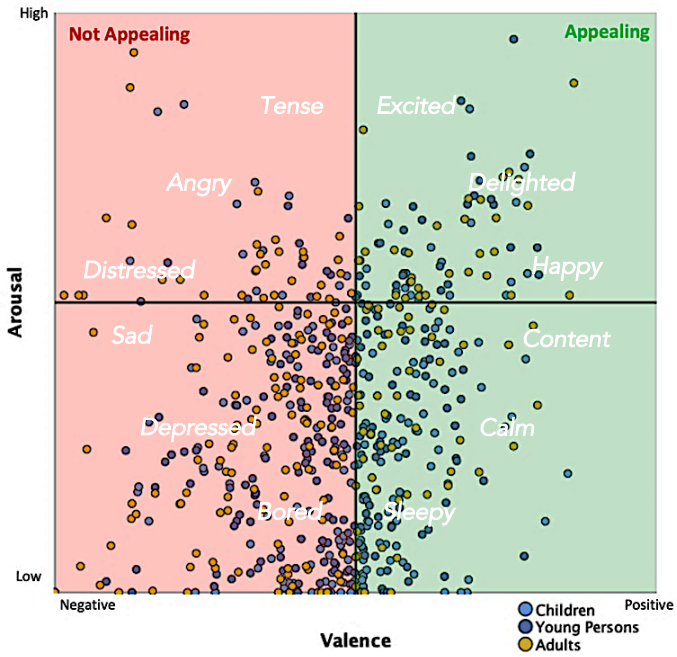
The average age of an esports spectator is 26. Soccer fans by contrast are, on average, 41 years old, NFL viewers 50, tennis spectators 61 and horse racing fans 63[25]. We therefore expected children and young persons to be particularly attracted to anything related to esports – including gambling advertising. Conversely, we expected that advertising for traditional gambling opportunities would appeal more to adults.

Valence-Arousal Plane

Contrary to expectations, the valence-arousal plane for **traditional gambling** advertising shows more adults (yellow dots) than children and young persons (blue dots) in the left negative quadrants.

What is more, in the top left quadrant (intense negative feelings like distressed or angry) we find 18.1% (40 out of 221) of the adults, as opposed to 6.2% (13 out of 210) of the children and 7.7% (17 out of 222). **Adults are therefore three-times more likely than children and young persons to have intense negative emotions towards ads for gambling on traditional activities.**

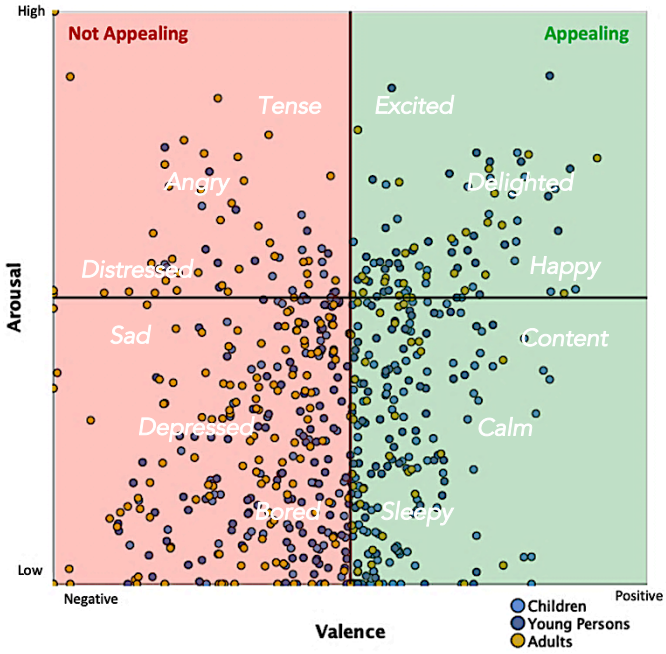
Valence-Arousal Plane for Ads for Traditional Forms of Gambling



As expected, the findings are even more extreme for esports. Many more light- and dark blue dots (children and young persons) are located on the right – indicating positive emotions. The left side of the plane is again dominated by adults. Notably, in the top left quadrant (intense negative emotion), were 41 adults, and only 11 children and 10 young persons. **This means, adults are four-times more likely to feel strong negative emotions when exposed to esports gambling adverts than children and young persons.**

If we look at the bottom-right quadrant – indicating emotions such as *calm* or *content* – the pattern is confirmed. In this quadrant are only 35 adults, but 64 young persons and a striking 97 children – **making children almost 3-times as likely than adults to feel subtle positive emotions when exposed to esports gambling ads.**

Valence-Arousal Plane for Ads for Esports Gambling

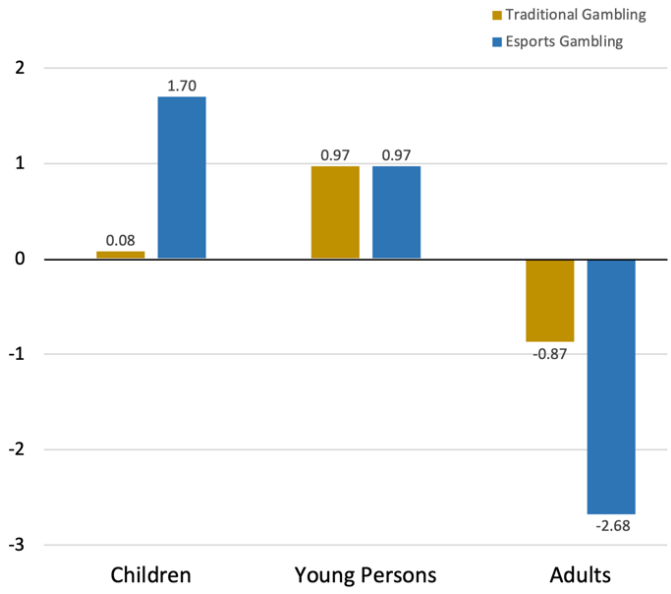


Appeal Scores

The bar chart shows very clearly that adverts for both forms of gambling are quite clearly of "particular appeal to children".

Esports gambling ads are dramatically more appealing to children and very unappealing for adults.

The mean-difference in appeal of esports advertising to adults versus children was a stunning 4.38 – one of the largest differences across all categories.



This really seems to support the supposition that – inadvertently or not – **children and young persons are targeted by esports gambling advertising**. This is a serious problem that needs to be urgently addressed.

Beyond that it is clear that adverts for traditional gambling are very much more appealing to 18-24 year olds than adults.

These differences are all statistically highly significant.

The CAP contains no special provision for esports and the issue of esports betting is barely on the radar of public and policy discourse.

It is clear that esports gambling advertising appeals almost exclusively to children and young persons and we conclude that a ban on advertising esports gambling advertising is the only workable way to protect these two groups.

That gambling advertising for sports and activities that have a much older fan-base is also much more appealing to the very young is also very concerning and demands a rethink of the regulations in general.

Gambling Advertising Features that Appeal to Children

Currently, the advertising codes and guidance on what is deemed as *particularly appealing* to children is based on specific advertising features. Such features often stem from past rulings conducted by adults in the ASA enforcement team. In 2012, for example, ASA received complaints about a gambling ad that included an image of a famous Transformers cartoon character and ruled that the ad breached CAP codes by being of particular appeal to children[26]. Such rulings then become part of future guidance – for example, in 2018 the ASA published guidance outlining that "cartoon animals, fairy tales and colourful exaggerate graphics are likely to appeal (to children)" [26].

This feature-based approach, however, does not work: First, the guidance is very vague – in our previous research we found that in 21% of cases, it was not clear (to adult evaluators) whether the gambling adverts were "of **particular** appeal to children"[5]. Second, current guidance is based on adults´ evaluation on what they think appeals to children – which does not work.

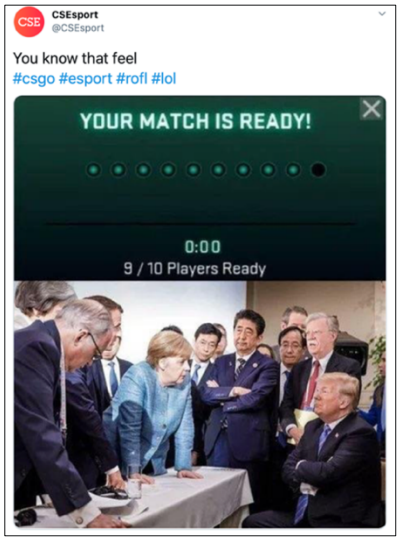
This was particularly evident in two gambling ads in the research reported here: one included a cartoon child and another a cartoon unicorn (see images below) – both adverts likely to be judged of "particular appeal" based on previous policy guidance. **However, both of these adverts had little appeal to children at all.** In fact these two examples had the lowest appeal rating by children out of all 24 adverts shown.

Conversely, the adverts that were most appealing to children would not be deemed to breach regulations by CAP (based on the current guidance).

One such example is an advert by an esports affiliate, that includes a famous image (see below) of world leaders at the 2018 G7 summit. Angela Merkel, Emmanuel Macron, Theresa May and Shinzo Abe, standing around a table, looking down at Donald Trump, seated, pouting and arms crossed in defiance. Above the image, the meme says, "YOUR MATCH IS READY!" and "9 / 10 Players Ready", referencing esports players' frustrating experiences of having to wait for that one last player to join the game before a match can start.

It is probably the insider driven sentiments that make this image so appealing to children and young persons, who are more likely to have such gaming experience compared to older users.

Our findings imply that the rulings by the ASA and the suggestions of the CAP about what is appealing to children and what is not **does not reflect what children actually feel or think.**



RECOMMENDATIONS

1. Ban All Esports Gambling Advertising

Most esports fans are under 30. This means anything related to esports – including gambling – has an almost inherent appeal to children and young persons. It is even questionable whether esports gambling advertising can ever **not be** of particular/strong appeal to children and young persons.

Our research confirms very clearly indeed that esports betting adverts are of strong and particular appeal to children and young persons and that they do not appeal to adults.

Thus, inadvertently or not, 11-24-year-olds are targeted with this advertising.

Given the vulnerability of this age group with regards to gambling, esports gambling advertising should be banned.

2. Clarify and Tighten Gambling *Content Marketing* Regulations

Content marketing was very appealing to all age groups but of particular appeal to children and young persons.

The CAP should acknowledge that content marketing is advertising and is thus under the remit of all CAP codes.

Content marketing adverts on social media should be obliged to include clearly visible labelling (such "AD" or "#advert") to make sure users (especially children and young persons) understand the commercial nature of the post. This is a general principle of advertising regulations and is outlined in CAP Code 2.1 proscribing that "Marketing communications must be obviously identifiable as such".

The highly appealing nature of content marketing to children requires additional and much stricter regulations to address this new form of advertising appropriately.

3. Ask Children and Young Persons Directly and Frequently What Appeals to Them

Gambling advertising on Twitter is strongly and significantly more appealing to children and young persons than to adults. This is a serious issue. No one, however, has ever consulted children or young persons on what features of gambling advertising appeal to them. Currently, adults within the enforcement team of the ASA judge which adverts are of "particular appeal to children and young persons". Guidance is then published, for example, that cartoons, childish behaviour, or images of individuals under 25 are appealing and using them constitutes a breach of CAP Code 16.3.12.

However, our investigation of over 430 children and young persons clearly suggests that this does not work. Children and young persons found permissible gambling ads very appealing and ad features the CAP considers appealing (e.g. cartoons) **not appealing at all.**

We recommend that our SAM test be used to test advertising appeal to children and young persons on a regular basis.

4. Use Children´s and Young Person´s Answers to Urgently Review Guidelines for What Advertisers Must Avoid

The current CAP guidance for advertising features appealing to children is unclear and highly subjective – making it almost impossible for advertisers to stick to the rules.

We recommend that, using answers on the SAM tool from children and young persons, the criteria for "strong appeal" are urgently reviewed and very clearly articulated within the revised CAP code with **specific examples of images and text considered of "strong appeal".**

We recommend that this exercise is conducted regularly so that new techniques and features are constantly reviewed by children and young persons.

We also recommend that children and young persons are included on the ASA complaints committee to adjudicate what appeals to them.

5. Expand the Definition of "Young Persons" in CAP from 16-17 to 16-24

The CAP uses the terms *children* for anyone aged 0-15 and *young persons* for anyone aged 16 and 17. The statement that gambling advertising must not be "of particular appeal to children and young persons", refers to under 18-year-olds only.

However, in our study 18-24-year-olds found gambling adverts more appealing than other groups in almost every instance. This group accounts for the majority of gambling followers[5] and also experiences the greatest change in brain structure – making impulsivity more likely[14]. The ASA[27] have already identified young men as a particularly vulnerable group, our study adds more weight.

We recommend that the CAP extends their definition of "young persons" to persons aged 16-24.

6. Only Serve Up Gambling Ads on Social Media When Users Confirm they Recognise it and Want it

ASA have already stated that it is hard to know how many children are seeing gambling ads and our study shows that when they do see them they are strongly appealing.

We recommend that not only should all adverts (including content marketing) be clearly labelled but that social media platforms should use tools to ensure that the advert is recognised as such by the users. Instagram, for example, recently introduced a *Sensitive Content Control* which hides potentially disturbing content (e.g. pictures of dead animals or videos of aggressive behaviour) behind a message saying: "Sensitive Content – This photo contains sensitive content which some people may find offensive or disturbing". To see the image, the user then needs to click "See Photo" in order to see the content.

Such a tool should be used for all gambling advertising too. By shifting, from being passively exposed to the advert (i.e. scrolling through the feed and being exposed to content randomly), to an active confirmation of "Yes, I am ready to see the advertising content" could potentially ensure that users' advertising scepticism functions as it should. It would also ensure that users "Take Time to Think" – which is the gambling industry´s new key safer gambling message[28].

Such an advertising content control could easily be introduced by social media companies.

ABOUT THE AUTHORS

Dr Raffaello Rossi is Lecturer in Marketing at the University of Bristol. As social scientist, he is interested in the interface of social media marketing, public policy and consumer protection. His most recent work investigates the use of gambling advertising on social media to inform policy-makers and protect consumers, particularly children and young persons.

He contributed to recent gambling policy work in IpsosMORI´s Synthesis Report into the effect of gambling marketing and advertising on children and young people and co-authored the Biddable Youth report, a benchmark research investigating over 880,000 UK gambling adverts posted on Twitter.

Professor Agnes Nairn is Chair of Marketing at the School of Management, University of Bristol. Her research focuses on the relationship between the commercial world and young people's wellbeing and draws on psychology, sociology, culture theory and neuroscience with methodologies ranging from experiments to filmed ethnography.

She has been invited to join over 30 international multi-stakeholder projects working with corporations such as Unilever and Coca-Cola as well as for Brazilian, French, UK and Scottish governments and bodies such as EU Commission, UN, and UNICEF. In 2018 she was Special Advisor to the House of Lords Communication Committee on UK Advertising in a Digital Age.

Her work focuses on vulnerable consumers and media effects including advertising on their wellbeing. She is currently building a team of researchers at Bristol with growing expertise in understanding gambling harms particularly in relation to the role of social media marketing and new forms of betting such as esports.

A technical appendix for this research is available and can be requested from the authors via email: raffaello.rossi@bristol.ac.uk

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