



Gambling Related Harm APPG



John Whittingdale MP
Minister of State (Media and Data)
Department for Digital, Culture, Media and Sport
100 Parliament Street
Westminster
London
SW1A 2BQ

5 July 2021

Dear Minister,

The Impact of Gambling Advertising

We are writing to set out our concerns about your response to a Parliamentary answer on 7 June 2021. We are deeply concerned that your answer is misleading and that it has been subsequently appropriated by the industry to further their own ends. We write to urge the government to act in an informed way at this critical time.

In your response to a question from Ronnie Cowan MP about the link between advertising and problem gambling, you referenced one study from seven years ago by Professor Per Binde which was a literature review conducted for the Responsible Gambling Trust. You noted that 'while this research found evidence that advertising may adversely impact problem gamblers efforts to cut down, it did not establish a casual link between exposure to advertising and problem gambling'. Your response has subsequently been quoted by the Betting and Gaming Council in the media and they have also used this in a promotional video.

We are concerned about your answer for a number of reasons. Firstly, the Government must take an informed approach in its policy making based on the range of evidence. In the midst of a 'Call for Evidence' to inform the gambling review, the Government should not base a position on one study from one academic which was undertaken seven years ago. The Gambling market has evolved dramatically since then, as has advertising and the research base. The review by Per Binde is from 2014 and only covers advertising on traditional media, it is not a systematic review, but based on a google search. Moreover, Per Binde produced a further study in 2019 that said that in fact 'gambling advertising may contribute to problem gambling, and problem gamblers are more sensitive to advertising impact than non-problem gamblers.'¹

Indeed, other pieces of research have, also, identified a causal link. For example, the Advertising Standard Authority, in its response to Labour's Gambling Review, did find evidence of a causal link. They said:

"The emerging body of dedicated research explored the impact of advertising on behaviour. In general, it suggests some level of impact on particular groups. Several studies found associations between advertising exposure and the behaviour of problem and at-risk gamblers. Other studies looking at risk factors for different gambling activities identified particular at-risk groups or characteristics such as young men."

¹ [Self-Reported Negative Influence of Gambling Advertising in a Swedish Population-Based Sample | SpringerLink](#)



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They said that studies carried out in Norway and Australia – although they have distinct regulatory regimes and differing cultural attitudes to gambling - produced evidence that was “robust enough to support the existence of an association between exposure and gambling behaviour and to provide insights on likely risk factors.”

This later research corrects the view set out in your parliamentary answer that there is 'no evidence of a causal link' as these studies clearly show an association between exposure and problem gambling behaviour, according to the ASA.

Secondly, finding no evidence of a relationship is, of course, not the same as finding evidence of no relationship and the two have very different implications for policy.

Thirdly problem gambling is not a measure of the overall level of harm and therefore, of course, advertising may lead to harm as well as problem gambling, both of which should be a cause for concern for the Government.

For example, researchers at Ipsos Mori and the University of Stirling (in research published this year) found that 96% of people aged 11-24 had seen gambling marketing messages in the last month and were more likely to bet as a result. They said that regular exposure to gambling promotions can change perceptions and associations of gambling over time and impact the likelihood they will gamble in the future.

As you will also be aware, the Gambling Commission has also published the results of a recent survey, finding that 34% of British bettors admitted to being influenced by advertising. The research noted that 16.3% claimed that ads caused them to increase their gambling, whilst an additional 13% said ads led them to initially take up gambling, and 14.7% said viewing ads resulted in them to take up gambling again after taking a break.²

There is also a growing body of research on the impact of advertising on children. Gambling advertising is pervasive now. Whilst we note that the industry has undertaken actions such as the whistle to whistle ban on gambling adverts, there are still logos emblazoned on football shirts and on match hoardings. The recent documentary on Channel 4 by Ruth Davidson, for example, found that gambling logos can appear more than 700 times in a single football match. One recent edition of the BBC's Match of the Day magazine for 'footy mad youngsters' featured 52 gambling logos within it.

Beyond this, children are of course spending increasing amounts of time online where there are fewer advertising restrictions and are often engaged in gaming. Forms of gambling that are available to children to play online include social casinos or slots which replicate online slot machines or casinos but instead of gambling for cash, you gamble for virtual currency. There is gambling within video games or gambling by betting 'skins' (virtual possessions won or purchased within video games). Indeed, the Gambling Commission estimates that around 4% of children had bet using skins in the past week, and 11% have ever done it. As the academic Professor Wardle has commented “the question for policy makers is whether, under the current system, we can ever really adequately protect children from being exposed to gambling advertising and marketing or whether the system needs to change”.

In addition to your reference to one piece of evidence in responding to a question on the links between advertising and harm, the English Football League, which is arguing against the end of gambling sponsorship and advertising, has also just produced a report. In this report

² <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/understanding-how-consumers-engaged-with-gambling-advertising-in-2020>



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Professor Ian McHale cites that there is 'no evidence that sponsorship of clubs or leagues influenced participation in betting' and the industry has been heavily quoting this research.

Again, caution needs to be taken about utilising one particular industry funded report. Public health researchers have underlined their concerns about this new report which has been undertaken by a statistician who has used problem gambling surveys to look at trends which can be very misleading. The research also measures problem gambling as an outcome, which, as we note above, is not measuring harm. In the report, no objective measure of exposure is applied - only self-reporting - this could mean that those who did not notice it are always more likely to develop problem gambling and there is no scale applied to the relationship between exposure and harm. The research does also not look at issues such as seasonality and the changes in exposure at different points in time in a given year. It has also not been Peer reviewed, which would be best practice in a study of this kind.

Leaving aside the fact that there is now very strong public support for greater restrictions on gambling advertising (the Royal Society for Public Health has recently published polling showing that 77% of adults and 66% of 11 to 17 year olds would support a complete ban), the policy decisions and regulatory changes that could be made in the Gambling Review will impact on many people's lives for decades to come. The industry has said that policy makers 'have to deal with the evidence' and on this point we do agree.

In this review we have a once in a generation chance to ensure we develop the right balance between providing gambling in a safe and well-regulated way. The decisions must indeed be based on evidence which means a thorough assessment of *all* the evidence not the reliance of a position based on one piece of out-dated research. An approach of this kind will let all sides down. The Industry likes to jeer at those who do not agree with their position, apparently, we are 'Sunday School Prohibitionists'. But now is not the time for school-boy name calling. What we desperately need is a grown-up debate and a properly informed and considered response.

Your sincerely,

A handwritten signature in blue ink, appearing to be 'CH', with a long horizontal line extending to the right.

Carolyn Harris MP
Chair, All Party Parliamentary Group for Gambling Related Harm

A handwritten signature in blue ink, appearing to be 'DF', with a horizontal line underneath.

Lord Foster of Bath
Chair of Peers for Gambling Reform