GAMBLING ADVERTISING, RESPONSIBLE GAMBLING & PROBLEM GAMBLING: A BRIEF OVERVIEW

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TAKEN FROM 2016 Q4 (ISSUE 27) OF
CGi
Casino & Gaming International

Over the last few years there has been a great deal of speculation over the role of advertising as a stimulus to increased gambling, and as a contributor to problem gambling. Gambling advertising is now highly prevalent both online and offline and we are regularly encouraged to download mobile gambling apps, asked to bet-in-play, and gamble responsibly. But how do we respond to gambling adverts? Do they actually draw us in? Arguably the most noticeable change in the British gambling landscape since the Gambling Act came into force in September 2007 has been the large increase in gambling advertising on television.

In 2013, Ofcom published research examining the volume, scheduling, frequency and exposure of gambling advertising on British television. The findings showed that there had been a 600% increase in UK gambling advertising between 2006 and 2012 – more specifically, there were 1.39m adverts on television in 2012 compared to 152,000 in 2006. The report also showed that gambling adverts accounted for 4.1% of all advertising seen by viewers in 2012, up from 0.5% in 2006 and 1.7% in 2008.

So is the large increase having any effect on gambling and problem gambling? In 2007, prior to there being widespread gambling ads on television, the British Gambling Prevalence Survey (BGPS) reported that 0.6% of participants were problem gamblers (Wardle et al., 2007). In the 2010 BGPS, the problem gambling prevalence rate had increased by half to 0.9% (Wardle et al., 2011). Some of this increase may, arguably, have been due to increased gambling advertising. However, the latest British survey research combining findings from the Health Survey for England and Scottish Health Survey (Wardle et al., 2014) reported that the prevalence of problem gambling is back down (to 0.5%), so perhaps increased gambling advertising hasn't necessarily

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resulted in an increase of problem gambling.

Various lobby groups (e.g., anti-gambling coalitions, religious groups, etc.) claim advertising has played a role in the widespread cultural acceptance of gambling. These groups also claim advertising tends to use glamorous images and beautiful people to sell gambling, while other advertisements for lottery tickets and slot machines depict ordinary people winning loads of money or millions from a single coin in the slot.

Such lobby groups also claim that advertisements used by the gambling industry often border on misrepresentations and distortion, and that they are seductive, appealing to people's greed and desperation for money. Real examples reported by Griffiths (2005) include: 'Winning is easy', 'Win a truckload of cash', 'Win a million, the fewer numbers you choose, the easier it is to win', 'It's easy to win' and '$600,000 giveaway simply by inserting card into the poker machine'. Lobby groups further claim that in amongst the thousands of words and images of encouragement, there is rarely anything about the odds of winning – let alone the odds of losing. It has also been claimed that many gambling adverts feature get-rich-quick slogans that sometimes denigrate the values of hard work, initiative, responsibility, perseverance, optimism, investing for the future, and even education (Griffiths, 2005).

Content analyses of gambling adverts have reported that gambling is portrayed as a normal, enjoyable form of entertainment involving fun and excitement (Binde, 2014). Furthermore, they are often centred on friends and social events. The likelihood of large financial gain is often central theme, with gambling also viewed as a way to escape day-to-day pressures (one gaming company's advertising even had the strapline "Bet to forget").

The gaming industry typically responds in a number of ways. Griffiths (2005) listed the most popular arguments used to defend such marketing and advertising is that: (i) the gaming industry is in the business of selling fantasies and dreams, (ii) consumers knows the claims are excessive, (iii) big claims are made to catch people's attention, (iv) people don't really believe these advertisements, and (v) business advertising is not there to emphasise 'negative' aspects of products. While some of these industry responses have some merit, arguably a much fairer balance is needed.

Statements such as 'winning is easy' are most likely (in a legal sense) be considered to be 'puffery'. Puffery involves making exaggerated statements of opinion (not fact) to attract attention. Various jurisdictions deem it is not misleading or deceptive to engage in puffery. Whether a statement is puffery will depend on the circumstances. A claim is less likely to be puffery if its accuracy can be assessed. The use of a claim such as 'winning is easy' is likely to be considered puffery because it is subjective and cannot be assessed for accuracy. However, a statement like 'five chances to win a million' may not be puffery as it likely to be measurable.

Surprisingly, there is relatively little scientific evidence that advertising directly influences gambling participation and problem gambling. This is partly because demonstrating empirically that the negative effects of gambling are solely attributable to advertising is hard. For instance, a study by Amey (2001) of 1500 people in New Zealand reported an association between participation in gambling activities and recall of gambling advertising. The study found that over 12 months, 83% of people who had gambled between zero and three times remembered seeing gambling adverts during that time. For people that had gambled four or more times, the figure was at 93%.

In 2015, Hanss et al. (2015) published one of the largest studies carried out on gambling advertising. It involved more than 6,000 people and examined three specific dimensions of gambling advertising impacts: gambling-related attitudes, interest, and behaviour ("involvement"); knowledge about gambling options and providers ("knowledge"); and the degree to which people are aware of gambling advertising ("awareness"). Overall, the study reported that impacts were strongest for the "knowledge" dimension. It was also found that for all three dimensions, the impact increased with the level of advertising exposure.

The study compared the responses from problem gamblers against those of recreational (non-problem) gamblers. The study found that problem gamblers were more likely than recreational gamblers to agree that gambling advertising increased their gambling involvement and knowledge, and that they were more aware of gambling advertising. In simple terms, the study showed that gambling advertising has a greater impact on problem gamblers than recreational gamblers. This indirectly supports previous research showing that problem gamblers often mention that gambling advertising acts as a trigger to their gambling (e.g., Binde, 2009; Grant & Kim, 2001; Hing et al., 2014).

The study also found that younger gamblers were more likely than older ones to agree that advertising increased their gambling involvement and knowledge. This supports previous research showing that problem gambling is associated with stronger perceived advertising impacts among adolescents (e.g., Derevensky et al., 2010). One of the more worrying statistics reported in the Ofcom (2013) study was that children under 16 years of age were each exposed to an average of 211 gambling adverts a year (adults saw an average of 630).

Most researchers in the gambling studies field agree that advertising 'normalises' gambling and that all relevant governmental gambling regulatory agencies should prohibit aggressive advertising strategies, especially those that target impoverished individuals or youths. Most of the research data on gambling advertising uses self-report data (surveys, focus groups, interviews, etc.) and very little of these data provide an insight into the relationship between advertising and problem gambling. A review on gambling advertising by Planzer and Wardle (2011) concluded that gambling advertising is an environmental factor that has the power to shape attitudes and behaviours relating to gambling – but just how powerful it is remains unclear.

It is also worth pointing out that there are many examples of good practice when it comes to gambling advertising. Responsible marketing and advertising needs to think about the content and tone of gambling advertising, including the use of minors in ads, and the inclusion of game information. There has to be a strong commitment to socially responsible behaviour that applies across all product sectors, including sensitive areas like gambling. Socially responsible advertising should form one of the elements of protection afforded to ordinary customers and be reflected in the codes of practice. Children and problem gamblers deserve additional shielding from exposure to gambling products and premises, and their advertising. Many codes that regulate gambling marketing and advertising across the world now typically include special provisions on the protection of such groups (Griffiths, 2012).

An example of good practice is that of Canadian gaming operator Loto-Quebec outlined by Griffiths (2005). Loto-Quebec did a thorough review of its advertising code and some of the key aspects in terms of responsible marketing and advertising of gambling included:

- A marketing policy that (i) prohibits any advertising that is overly aggressive, (ii) rejects concepts liable to incite the interest of children, and (iii) prohibits the use of spokespeople who are popular among youth, and (iv) prohibits placement of advertisements within media programs viewed mainly by minors.
- The odds of winning are highlighted. This is being done in response to the suggestions expressed so frequently by various groups interested in knowing their chances of winning.
- Television commercials for new products devote 20% of their airtime to promoting the gambling help line and to presenting warnings about problem gambling.
- A policy that prohibits the targeting of any particular group or community for the purposes of promoting its products. For example, one of their instant lotteries used a Chinese theme to stimulate interest. However, the Chinese community did not agree with making references to its customs in order to promote the game. Out of respect for this community, the game was immediately suspended.

As various national and international advertising regulation bodies have advocated, socially responsible advertising should form one of the elements of protection afforded to ordinary customers and be reflected in the codes of practice. My own view is that

gambling advertising should focus on buying entertainment rather than winning money. Gambling problems often occur when an individual's primary reason to gamble is to win money rather than gambling for social reasons or for fun (Griffiths, 2007).

Many countries have strict codes for gambling advertisements, and good codes (like those in the UK) recommend that gambling advertisements must not: (i) exploit cultural beliefs or traditions about gambling or luck, (ii) condone or encourage criminal or anti-social behaviour, (iii) condone or feature gambling in a working environment (with the exception for licensed gambling premises), (iv) exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of under-18s or other vulnerable persons, (v) be likely to be of particular appeal to under-18s, especially by reflecting or being associated with youth culture, and (vi) feature anyone who is, or seems to be, under 25 years old gambling or playing a significant role.

Quite clearly it is appropriate and necessary for the gaming industry to advertise, market, and promote its facilities and products. However, all advertising and marketing should be carried out in a socially responsible manner because it is good for long-term repeat business. Overall, the small body of research on the relationship between gambling advertising and problem gambling has few definitive conclusions. In a comprehensive review, Binde (2014) concluded that (i) the advertising impact on gambling, if any, is small, and (ii) although only limited empirical evidence of advertisements affecting behaviour has been found, it appears theoretically plausible to think that there must be some sort of effect.

If gambling advertising does have an effect, it appears to impact specific groups (such as problem gamblers and adolescents) but most of this research uses self-reported data that has been shown to be unreliable among gamblers (Braverman et al., 2014). At best, the scientific research only hints at the potential dangers of gambling adverts. But in order to challenge the increasing normalisation of gambling among these most-at-risk groups, more robust evidence is needed. CGi

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