



# THE ADVERTISING STANDARDS AUTHORITY (ASA)

## PUBLIC PERCEPTIONS OF GAMBLING ADVERTISING IN THE UK

Qualitative Research  
October 2014

***Prepared for:***

*The Advertising Standards Authority*

***Prepared by:***

*Research Works Limited  
Regency House  
The Quadrant  
219a Hatfield Road  
St Albans, Herts  
AL1 4TB  
all@researchworks.co.uk  
Tel: 01727 893 159  
Fax: 01727 893 930*

## TABLE OF CONTENTS

1.	BACKGROUND TO THE SURVEY	3
2.	RESEARCH AND PROJECT OBJECTIVES	3
3.	RESEARCH METHOD AND SAMPLE	4
4.	MANAGEMENT SUMMARY	7
5.	SAMPLE COMMENTS	8
6.	PRE-TASK: RECALL OF AND RESPONSES TO ADVERTISING	10
7.	EPISODIC SEGMENT	12
8.	RESPONSES TO THE TARGET ADVERTISING	13
9.	RESPONSES TO IMPORTANT QUESTION AREAS	35
10.	FEELINGS ABOUT THE ASA	38
11.	CONCLUSIONS	39
	APPENDIX A: QUALITATIVE TOPIC GUIDE	41

## **1. BACKGROUND TO THE SURVEY**

The Advertising Standards Authority (ASA) is a not-for-profit organisation. It regulates advertising across all media, ensuring that it complies with the UK Advertising Codes. The Committee of Advertising Practice is the industry committee that writes the Advertising Codes and provides compliance advice to the industry.

The ASA has recently launched a review of gambling advertising in the UK. There is presently political and societal concern about:

- Children being exposed to gambling ads
- The perceived ‘aggressive’ nature of some ads
- How gambling ads impact on vulnerable consumers.

ASA wished to explore these matters as part of this project.

An objective of the review was to determine whether the ASA is matching societal expectations around gambling advertising and it commissioned qualitative research to explore the public’s views on what is harmful and irresponsible in UK gambling advertising. Research Works Ltd (RWL) was commissioned to conduct this research.

## **2. RESEARCH AND PROJECT OBJECTIVES**

The requirement for this research was driven by a number of important factors:

- Public perceptions of gambling advertising have not been researched by the ASA since the introduction of the Gambling Act 2005
- The number of complaints about gambling advertising has increased in recent years, which has been driven, in part, by competition and technological developments within the remote gambling market, reflecting the fact that consumers are interacting with gambling products in new ways (e.g. online and via mobile devices)
- Government wants to know whether ASA is meeting its regulatory objectives  
Research will bring additional value to the work of the ASA, help it make better decisions and provide a better basis to explain its decisions publicly.

The research explored potential harm in gambling advertising more broadly, but with a particular focus on:

- Children’s exposure to sports betting (particularly on TV)
- Children’s exposure to bingo advertising (because this advertising is not subject to the same voluntary scheduling restrictions as other gambling advertising)
- Whether TV Bingo ads are leading people to websites where harder forms of gambling are promoted

- Whether ads encourage gambling in such a way that could lead to increased problems in vulnerable groups
- ‘Aggressive’ ads that ask people to “Bet now!”
- Whether “free bet” offers and other sales promotions encourage consumers to gamble.

As well as answering broad questions around what the public finds harmful in gambling advertising, the research also addressed questions such as:

- Is it acceptable for gambling ads to be shown during TV sporting events?
- What type of imagery might appeal to children?
- Do gamblers and non-gamblers perceive ads differently?
- Do sales promotions (e.g. free bets) encourage consumers, particularly non-gamblers, to gamble?
- Are “in-game” betting ads shown during live events, particularly those encouraging to “bet now!” viewed as aggressive or irresponsible?
- Do members of the public believe that timing and placement media restrictions reduce harm for children and vulnerable adults?

### **3. RESEARCH APPROACH AND SAMPLE**

#### **3.1 Method and Approach**

A qualitative approach was adopted and focus groups were the chosen research method:

- RWL conducted extended focus groups (comprising 8-10 respondents and of 2 hours duration) in order to conduct the discussion in a staged and informally deliberative manner.
- The groups began with an unprompted episodic examination of a range of advertising materials (including key gambling advertising executions) and then moved through an increasingly more detailed exploration of the potential impacts of such advertising – including impacts on the actual behaviours of respondents as detailed in their pre-task diaries.
- In addition to focus groups, RWL conducted a series of extended (1½ hour) depth interviews with regular gamblers. A one-to-one setting was necessary to gather in-depth outputs regarding the behaviours and attitudes of a range of regular gamblers – as well as exploring their reactions to potentially harmful gambling advertising.
- More broadly, it was felt that, in order to achieve the research objectives and obtain truly insightful, actionable, findings, it would be necessary to employ a structured and

staged approach to the research method, based around a number of complementary methods:

- Pre-tasking for all respondents: all respondents were asked to complete a diary during the week preceding their attendance at the focus group session. The diary recorded all recall of gambling advertising seen in that period, as well as their immediate feelings about that advertising and whether it had any impact on their behaviour (especially in relation to actual gambling behaviour).
- Follow-up bulletin board, email and telephone contact options: we provided a range of different channels to allow respondents to give further post-session feedback.

### **3.2 Sample**

The research sample was shaped by the requirement to reflect:

- A nationwide sample: covering four regions.
- All adults
- A mix of ages, social background and gambling habits
- The views of parents with children under 18.

In constructing the research sample RWL wished to:

- Provide a robust, mainstream sample of the general public
- Include some potentially vulnerable audiences (specifically, young people who are occasional gamblers)
- Include some regular gamblers, in order to explore how advertising might be impacting on existing target audience behaviours and decision-making.

Other considerations when structuring the sample included:

- Segmenting the sample by gender: it was not felt that men and women typically share similar views in relation to the issue of gambling. Equally RWL was conscious that men (especially C2DE men) may not speak freely about their own attitudes and preferences around gambling and gambling advertising with women present
- Including some in the mainstream family-stager audience who do gamble occasionally, in order to get a balanced view from those who have children but do not reject gambling in principle

- Segmenting the sample by socio-economic group: RWL was conscious that types of gambling and regularity of gambling differ in lower socio-economic sections of the population and that attitudes towards gambling may differ significantly from those held by white-collar groups.

RWL excluded from the sample:

- Anyone who has made, or is making, a complaint to the ASA about advertising
- Anyone who is an absolute rejecter of gambling on strongly-held moral or religious grounds. We also excluded people who have sought help for problem gambling.

This decision was taken to facilitate group productivity, since a basic level of homogeneity is an important component of a successful focus group session. Experience tells us that individuals with highly personal levels of involvement with the research topic are likely to dominate a focus group and have 'expert' levels of knowledge of the research issue which makes their views incapable of being generalised more widely. Equally other members of the group will defer to views of an 'expert' and contribute less as a consequence.

The research used the following sample structure:

6 extended focus group sessions (2 hours duration, 8-10 respondents in each), comprising:

1. Younger Men, aged 18-25; C1C2DE
2. Younger Women, aged 18-25; C1C2DE
3. ABC1 Men; Family Stagers, with young children
4. C2DE Women; Family Stagers, with young children
5. ABC1 Women; Family Stagers, with older children
6. C2DE Men; Family Stagers, with older children

5 in-depth extended (1 ½ hour) depth interviews with regular gamblers, comprising:

- A mix of gender, age and life-stage
- Gambling at least weekly (some to be gambling daily)
- Mix of gambling types and channels for gambling (including online)
- None to have received formal treatment for gambling addiction.

Definitions for gambling behaviour were agreed with the ASA project team and included activities such as: betting on horse and dog racing, FOBT, sports betting, spread betting, bingo, lottery betting and casino betting. The research was carried out in Manchester, Birmingham, St Albans and London during August 2014.

A detailed topic guide was produced, which can be found in Appendix A to this report.

#### 4. MANAGEMENT SUMMARY

Our pre-task diary exercise showed that people are exposed to far more gambling advertising than they might have assumed. Younger men and older women from lower socio-economic groups clearly see a great deal of gambling advertising (especially bingo advertising on daytime television).

Attitudes towards gambling advertising were characterised by competing responses. Initially gambling was broadly acknowledged to be potentially harmful, with protection from gambling advertising needed for children in particular. Conversely, however, a majority of respondents simultaneously held a parallel view which states that gambling is a common and relatively normal leisure pursuit, which can be enjoyed responsibly. There was resistance to the idea that advertising for gambling should be targeted for constraint.

A majority were inclined to be relaxed in relation to gambling advertising, provided it is not misleading, inaccurate or specifically targeted at children.

The type and nature of the complaints made about the target advertising were a genuine surprise to many in the sample. The ASA itself was reasonably familiar and many respondents assessed the organisation to be sensible, considered and effective. A majority of respondents agreed with the judgements made by the ASA in all cases, which they found appropriate and balanced.

Feelings about the core research issues explored in the research tended towards a libertarian position; gambling was seen as a normal and acceptable leisure pursuit.

The timing and placement of gambling advertising was viewed as straightforward, with no gambling adverts to be allowed around children's programming.

Children's exposure to sports betting was not seen as a significant problem and children's exposure to bingo advertising was also seen as unlikely to cause harm.

The issue of TV bingo leading people towards harder forms of gambling was complex: the public was doubtful, but regular gamblers confirmed this to be true.

Equally, 'bet now' advertising, did have an impact on the male regular gamblers, all of whom admitted to being affected to the point of '*wanting to have a bet!*'

Finally, the issue of the impacts of gambling advertising on vulnerable audiences elicited a debate which indicated that our sample was aligned against censorship on this basis, unless material is obviously distasteful, offensive or intended to manipulate or deceive.

## **5. SAMPLE COMMENTS**

### **5.1 General public**

Attitudes towards gambling across the sample were broadly libertarian; while some older respondents disapproved of what they saw as an aggressive gambling industry, most were inclined to 'let people make their own minds up'. There was little support for more control over gambling advertising, unless this might be seen by impressionable younger people or children.

Younger men, both singles and family-stagers, were typically betting at low-levels, predominantly on football. All believed that gambling represents a harmless leisure activity, which is part of the normal enjoyment of sport in a social context.

Women were typically gambling less frequently than their male counterparts, but many had enjoyed attending bingo for the social aspects. Few were playing bingo online, or gambling in any other way online.

Older family-stagers had most concerns about the prevalence of gambling (especially online), since they were conscious of the interest shown by their own children. Nonetheless most did have an occasional personal bet (lottery, pools, Grand National) and acknowledged that online gambling was a more typical aspect of modern leisure than it might have been for previous generations.

Overall, the sample showed a strong inclination towards resisting more 'nanny-state' interventions in advertising and associated behaviour. Most felt that, so long as children are actively protected (as they are currently seen to be, by TV watersheds and responsible advertising approaches), then adults should be allowed to make their own decisions about gambling.

### **5.2 Regular Gamblers**

The sample of regular gamblers reflected a very different and considerably more expert gambling audience when compared to the general public sample. The sample included:

1. A middle-aged man, in full-time employment and married with children, who gambles daily online, using betting exchanges to carry out arbitrage betting, focussing on free bet offers from bookmakers. He had been gambling regularly for more than thirty years, but did not see his activity as harmful and claims no financial problems as a consequence of gambling
2. A middle-aged woman, in full-time employment and married, who attends bingo twice weekly, plays slot machines in high-street bookmakers, does the National



Lottery regularly and plays online bingo (especially when free play offers come to her attention)

3. A younger professional woman, married and in full-time employment, who bets online on football virtually daily (and at the weekends as a family activity with her children). She also does the National Lottery twice weekly
4. A young man, single and in full-time employment, who bets regularly on football with high street bookmakers and visits casinos in Luton and London on a weekly basis. He also bets on horse racing online
5. A younger man, married and in full-time employment who bets regularly 'on everything' (horse racing, football, physical and online casinos, FOBTs). He uses both high-street bookmakers and online sites.

This was a very experienced sample of gamblers, although all very normal in terms of other lifestyle factors, who saw their gambling simply in terms of being their chosen leisure pursuit. Most of their peers and immediate social group were also gambling regularly and so it was not seen as unusual or potentially harmful.

Their experience with gambling meant that all were very familiar with much of the advertising being tested in this research (indeed, one of the men had been 'taken in' by the 888 Casino offer). Their views about the advertising were considerably more well-informed than those of the general public and pitched at a different level of engagement (so there was debate about whether Bet Victor really does offer the best odds on football, for example).

This audience is really not affected by advertising which focuses on offers of free bets (they know in detail that, typically, few offers are truly 'free') or by the presentation of gambling as a glamorous activity (they are sure it is not). It is an audience that recognises the realities of betting as leisure activity and accepts the associated risks.

These respondents can, however, be affected by advertising which addresses and focusses upon the 'buzz' or 'thrill' which all agree is delivered by gambling. So the Bet365 advertising with Ray Winstone clearly generated a level of engagement amongst the male respondents, who all admitted that it made them want to have a bet. Equally some of the female respondents responded very positively to the presentation of bingo (in the Foxy Bingo advertising, for example) as a fun, social activity.

This group all recognised and acknowledged the addictive aspect of gambling (although believed that they have this under control) and were conscious of the ease with which people can be drawn into involvement in different types of gambling. All were particularly critical of 'free bet' or 'free money' offers which they were certain would appeal to younger people. Many respondents had experience of this, either from personal

experience or through family/friends and recognised that children and young people take this type of offer at face value and typically believed the claims without question.

While this sample segment were possibly more critical of the target advertising reviewed in this research - primarily because they feel they understand the inaccuracies and subtexts inherent in much of it - they were also strongly of the opinion that people should be able to make their own minds up about gambling as a leisure pursuit. For them it was enough that children are protected from harm and advertising is honest.

## **6. PRE-TASK: RECALL OF AND RESPONSES TO ADVERTISING**

Respondents were asked to keep a diary to record the various types of advertising (both in terms of subject matter and channel) that they had noticed in the week prior to attending research sessions. The purpose of this exercise was to obtain some measure of exposure to and awareness of, gambling advertising as a specific component of the broader advertising universe.

This exercise indicates that gambling advertising is very prevalent across a range of media and has a strong presence in the advertising awareness of many in our sample groups.

A summary of the diary outputs is given below – structured from the groups with greatest recall of gambling advertising (ABC1 Family-stager men) through to those with least (ABC1 Family-stager Women):

### **MEN WITH YOUNGER FAMILY ABC1 (greatest recall of gambling advertising)**

- TV adverts were by far the best recalled by this group, followed by print, internet and billboards
- Advertising categories recalled included services (financial, insurance, telephone); consumer durables (tech, cars, furniture), gambling and food & drink
- Gambling brands recalled focused on Bet363, Skybet and Paddy Power

### **MEN WITH OLDER FAMILY C2DE**

- TV was the dominant advertising channel, followed by internet, print, billboards and shop fronts
- Advertising categories recalled included: services, consumer durables, food and drink, gambling and travel/leisure
- Gambling brands recalled included: Betfred, Ladbrokes, Supercasino, Bet365 and Gala Bingo

### **WOMEN WITH FAMILY C2DE**

- Family women recalled the broadest range of advertising across all media

- TV was the prime source, but also internet/phone apps, billboards and print
- Advertising recalled included: food & drink, services, beauty, household products, gambling and travel/leisure
- Most recalled adverts for gambling shown on TV or their phone apps
- This group mentioned more Bingo adverts than any other kinds of gambling - over half of the gambling adverts mentioned by this group related to Bingo (either online or otherwise). The rest referred to more general gambling outlets, as opposed to brand specific. The brands recalled included Dotty Bingo, Foxy Bingo, Skybet and Paddy power
- A majority of advertising seen on phone apps was for computer games.

#### **MEN (SINGLE) 18-26 YEARS C1C2DE**

- Young men typically recalled print, billboards, bus stops and TV advertising
- Main categories of advertising recalled included: services, fast food/food & drink, gambling and fashion/clothing
- Gambling adverts recalled included: Ladbrokes, Bet 365, Paddy Power, Health Lottery, Lottery Scratch cards and Gala Bingo
- Several saw the same gambling adverts, on the same media, on consecutive days.

#### **WOMEN (SINGLE) 18-26 YEARS C1C2DE**

- TV adverts were most recalled, followed by online, phone and print
- Fast food adverts were the most frequently recalled: followed by services, travel/leisure, beauty, fashion/clothing and gambling
- Low recall of gambling advertising: quite disparate and non-specific brand recall, including: 888 casino/'casino generally', Ladbrokes, Skybet and Bet 365

#### **WOMEN, WITH FAMILY ABC1**

- Most advertising recalled was either on the TV or in printed media.
- Women in this category recalled the fewest number of gambling adverts
- Women in this category recalled noted a lot of advertising for Travel and Leisure
- Gambling brands recalled included: the Lottery, Betfred, Paddy power, Postcode Lottery and Fabulous Bingo

NB: The services category (including banking, insurance of various kinds, telephone providers, money advice, price comparison sites etc.) was the most frequently recalled subject matter for advertising across the sample.

## 7. EPISODIC SEGMENT: REACTIONS TO THE INITIAL REEL OF ADVERTISING MATERIAL

The advertising reel was initially perceived to contain a large amount of loud and strident advertising, driven by loud music and strong colours, with a strong focus on money. The presence of gambling advertising was noted and generally linked with a perceived rise in gambling behaviour throughout society (especially in relation to bingo).

The bingo advertising were clearly identified as being targeted at women, focussed on free offers and, in the main, 'pretty naff' in terms of presentation:

*"All the bingo ones are aimed at women. My connotation is that bingo is only played by women. They're trying to outdo each other with the rewards they are offering- £10, £20, £30 – and showing how easy it was to bet. There is so much competition in that market that they've got to outdo each other. They're all for women, mainly of a working class background. Dinner ladies and that type" (Female, Family stager, Birmingham)*

*"The bingo ads are all much of a muchness. They all go for the same kind of market. It's the same trashy, glamorous approach. They're all very garish, very loud, streamers and fanfares and all the rest of it. They are just trying to grab your attention and then push what rewards and benefits you'll get for going with them over any of their competitors. But it is hard to differentiate between any of them" (Female, Family stager, Birmingham)*

The betting advertising for football and sports was viewed as more compelling and hard-hitting, showing a strong male-orientation and delivering its message in a very insistent, commanding manner:

*"Bet 365 and Ray Winstone is aimed solely at men. He's just a bloke with technology around him. They are targeting men who bet on football whereas all the bingo ads are targeting all the women who used to go to a bingo hall but now you want to make them comfortable with the technology so they can now sit at their laptop and do it just as easily" (Male Family-stager, 26-40)*

After more lengthy consideration, some respondents pointed out that the gambling advertising is typically based on a lifestyle appeal to clearly-defined target markets, as well as offers or calls for action, rather than more subtle, brand-focussed approaches:

*"They are quite explicit in what they want you to do. They want you to sign up straight away. It's a very instantaneous thing. If you compare them to Lexus: not everyone is going to buy a Lexus but it will raise the status and prestige of that car. It's a purchase decision that's much further down the line. Booking a holiday with BA is something you may do in*

*three months, a car may be in six months. A bingo ad or Bet 365 ad at halftime wants to get people instantly” (Male Family-stager, 26-40)*

## 8. RESPONSES TO THE TARGET ADVERTISING

Each of the thirteen examples of advertising had been the subject of a complaint, which had been considered, either formally or informally, by the ASA. The specific complaint and a summary of the response from the ASA is given for each advert before the research findings. During the group discussions and interviews, respondents were not told of the ASA’s final decision until each advert had been fully discussed.

### 8.1 Cashcade: Foxy Bingo – TV advertising



**Complaint:** One viewer challenged whether the 'Foxy' character would be likely to appeal to children.

**Decision: Not upheld:** The ASA noted Cashcade and Clearcast's argument that the Foxy character had been designed in such a way as to represent an older adult figure in order to appeal to the target audience of women aged 35 years and over. ASA also noted that, because it promoted a gambling product, the ad had been given a scheduling restriction which prevented it being broadcast in or adjacent to children's programmes, or programmes commissioned for, principally directed at or likely to appeal particularly to audiences under the age of 18.

## Research findings:

A very well recognised advertising campaign, which typically elicited a very polarised response from both male and female groups.

Some genuinely enjoyed it and found it fun:

*"I quite liked the Foxy Bingo. I know it's a woman's advert but I think the party set up was fun. It's quite family oriented" (Male Family-stager 26-40)*

*"It made me want to go and play bingo actually. I enjoyed the ad. It was lively and memorable" (Female, Single, 18-25)*

Many others found it intolerable, sexist and irritating:

*"It's not a party. You're at home on your own. In the song it says come and play bingo for free. Stupid" (Female, Family-stager, 26-40)*

*"It's a silly advert and sexist. It's got a male fox in high heels leading a load of women into playing bingo" (Female, Single, 18-25)*

It was clearly seen as targeted at a working-class or lower-socio economic audience:

*"It's shown around Jeremy Kyle's show and that tells you something – I think they sponsor him. It's aimed at couch potato benefits people who want something for nothing" (Female, Family-stager, 26-40)*

*"It's for women, mainly of a working class background. Chip-shop ladies and that type" (Male Family-stager 26-40)*

Interestingly, some respondents felt that, by focusing on a fun, lifestyle, 'party' presentation, this advertising is trying to change perceptions of bingo as a gambling pastime:

*"It doesn't seem like gambling - it seems more acceptable because it's like old ladies playing bingo. Bingo seems different to making a bet, although actually it is just the same" (Female, Single, 18-25)*

All the respondents believed that this advertising would definitely be appealing to children, since all colourful material featuring music and animal characters is known to do so. Equally, however, none believed that it would be likely to encourage children to gamble because of when the advertising is likely to be shown:

*“It’s on around Jeremy Kyle’s show and kids shouldn’t be watching that should they?”  
(Female, Family stager, 26-40)*

*“If it’s shown during adult programmes then I can’t see it having any impact on children really. It’s just fun really, it doesn’t have details about gambling does it?” (Female, Single, 18-25)*

Responses to the ASA’s judgement were rather mixed:

A majority believed that the advertising is essentially superficial fun, clearly aimed at a target audience of working-class women, and has little content that could be dangerous to vulnerable audiences:

*“It’s a laugh isn’t it? A massive conga led by a sleazy old fox who wants you to play bingo. Good choice of music, but I’d say this gets on people’s nerves after a few watches. It’s not saying much apart from that bingo can be fun” (Female, Family stager, 26-40)*

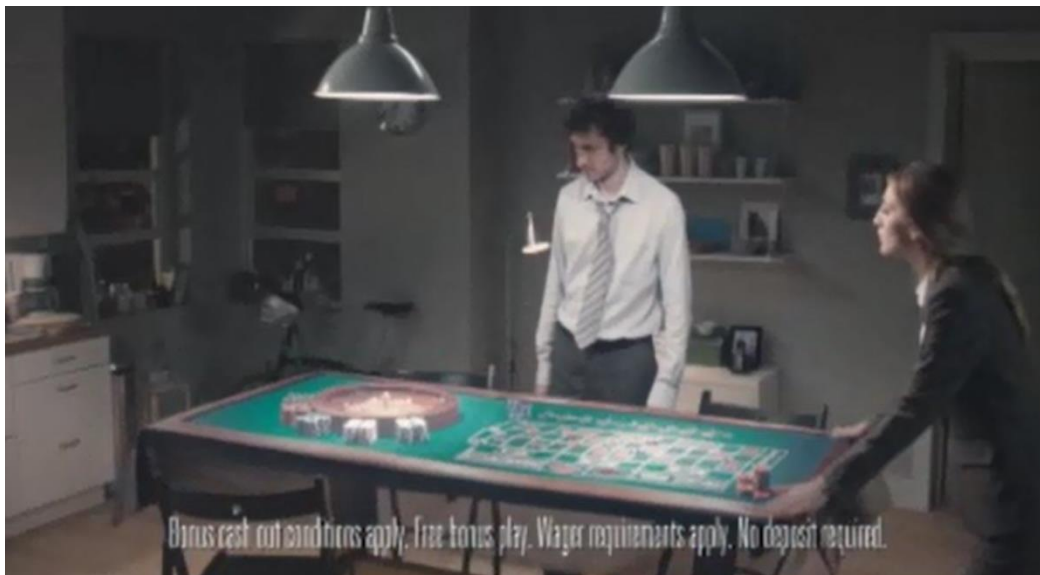
Some, however, were concerned that advertising which features a central animal character (whether clearly adult or not), dancing and catchy music, would undoubtedly attract the attention of children – although few could articulate the ways in which they believed harm might be caused:

*“Kids would think this is fun, it has a furry fox and a dinner lady – it would definitely appeal to them, but I can’t see how it could make them interested in gambling, so I suppose it’s ok!” (Female, Family stager, 26-40)*

Overall, however, a majority of the sample ultimately agreed with the ASA’s judgement in this case, feeling that the restrictions in place on showing the advertising would be enough to protect children:

*“It shows that the ASA have thought about it; it shouldn’t be shown close to children’s programmes and they’ve made sure it isn’t” (Female, Single, 18-25)*

## 8.2 Betway Casino - TV advertising



**Complaint:** The complainant challenged whether the ad was irresponsible, because it prioritised gambling over everyday activities.

**Decision: Not Upheld:** The ASA noted the ad depicted a fictional scene of the home in which a number of household items represented gambling related items. ASA considered the ad made clear that the activities occurred after work and that the couple were participating in gambling, as a form of light hearted entertainment, in each other's company in their free time. In that context, ASA considered the ad did not portray gambling as taking priority in life. On that basis, ASA concluded that the ad was not irresponsible and did not breach the Code.

### Research Findings:

Again, this was well-recalled advertising which generated a polarised response on the basis of exposure. It has obviously been extensively aired, causing some respondents to become 'sick of seeing it'.

A majority, however, clearly saw this advertising as appealing and clever:

*"A couple come home from work and get straight to betting. It's a clever advert. It's a nice apartment with 2 very attractive people and everywhere they go there's different forms of betting. It's blatantly obvious what it is"* (Male, Family-stager, 26-40)

*"A good entertaining ad. Engaging and clever. Aimed at busy, young professionals. Slick and well-made, very straight forward"* (Male, Single, 18-25)



*"It's saying you can bet any place, any time. They make it look very easy. You can put a bet on while you're making a cup of tea" (Female, Single, 18-25)*

*"It's not an irresponsible ad – it combines elements of the glamour with the reality that you'd be sitting doing this at home on your sofa with the tablet." (Female, Family-stager, 26-40)*

There was a general belief that the advertising is aimed at both men and women, focussing on a message that betting can happen anytime, anywhere:

*"You can almost bet on any sort of game, anywhere, anytime and on any laptop, mobile or computer. To me they were making out that gambling is a normal part of everyday life" (Male, Family-stager, 26-40)*

*"Sit down with your missus and do some betting" (Male, Family-stager, 41-60)*

*"That relaxed good looking woman could potentially be me" (Female, Single, 18-25)*

While a minority saw this advertising as potentially glamorising a betting lifestyle, most felt that it presents a relatively normal (if upmarket) home situation, with no evidence of problem gambling behaviour:

*"What is it saying about gambling? It's saying it's fun; social; communal; convenient. There are no negatives really" (Male, Family-stager, 26-40)*

*"It's saying everyone can be a gambler. The woman was in a good suit so she's obviously come in from a good job but she can still relax and bet at home with her boyfriend" (Female, Family-stager, 41-60)*

Some commented negatively on the use of iPads in the advertising:

*"That would bring it into the world of young people and children – they have iPads and this seems to be making it like a game" (Male, Family-stager, 26-40)*

Responses to the ASA's judgement varied, but most supported the specific decision.

Those who were unhappy with this advertising focussed on:

- Presenting gambling as an everyday, 'normal' activity (an attitude most readily expressed by respondents from lower SEG sample segments)
- Presenting gambling as glamorous and associated with a successful lifestyle

- Presenting gambling as easily accessible, using a wide variety of technologies.

A majority, however, were clear that they viewed the advertising as showing a reasonably ordinary couple enjoying their leisure time in a normal manner. Few saw any evidence of damaging behaviour or that gambling should be seen as a priority. Nonetheless, there was a belief that this is wholly adult advertising and should be shown after the 9pm watershed:

*"You can't base an advert on the perfect lifestyle. Everyone comes home and does different things" (Male, Family-stager, 26-40)*

*"I think someone who could suggest that an advert was like real life is pretty weird. They are just selling you something. They are not suggesting this is how you should live your life" (Female, Family-stager, 26-40)*

*"It shouldn't be on before 9pm because parents want to impress kids with the importance of handling money responsibly and of family time" (Female, Single, 18-25)*

### 8.3 Victor Chandler - TV advertising



**Complaint:** Complainant believed that: *"Over the course of the campaign the character has engaged in increasingly high risk behaviour, apparently driven by a compulsive need to bet"*

**Decision: Not Upheld:** ASA decided not to investigate this complaint following a previous Council decision (not formally investigated) about other ads in the campaign where it was decided that the character didn't have an unhealthy relationship with gambling.

**Research Findings:**

A well-recalled advertising campaign, presenting a strong brand message.

All respondents believed that the advertising presents an extreme, comic-fantasy scenario that has little connection with real-world situations. Some, indeed, found this campaign confusing and incomprehensible:

*"Apart from the football odds on the screen at the end I didn't understand what they were on about. I didn't get the narrative behind it" (Male, Family-stager, 26-40)*

*"It's about the guy constantly trying to get the best deal from Victor Chandler, so he does it in these different scenes. I find the guy really nauseating, nothing about Victor Chandler or the offer or the brand. He puts me off as much as the guy in Go Compare puts me off" (Male, Family-stager, 41-60)*

The advertising was broadly acknowledged as intended to be humorous:

*"It's not intended to be real life – the bloke's supposed to be a nutter, it's a really exaggerated set-up, showing how keen the bloke is to get the best odds" (Male, Family-stager, 41-60)*

*"It's typical crazy advertising, intended to emphasise how good the offer is ...that someone would go to those lengths to get to it. You see this approach all the time" (Male, Family-stager, 26-40)*

Equally, some saw the advertising message as relatively sophisticated:

*"Only proper gamblers are going to be bothered about who's got the best odds – most people wouldn't understand that odds vary, would they?" (Male, Family-stager, 41-60)*

Responses to the ASA judgement were very consistent. Respondents felt that it was unreasonable to assume that people watching the advertising would believe that the 'addicted' character was real in any way:

*"I think, get a life really. I don't think that ad will necessarily make someone go out to gamble. It's like watching a Carlsberg ad and thinking it's going to make someone an alcoholic. You can't link them" (Male, Family-stager, 26-40)*

#### **8.4 Bet365: Ray Winstone - TV advertising**



**Complaint:** The complainant, who saw the ad during an England football match at 8.50pm, objected that it was irresponsible and harmful, because they believed that the style of the ad and the inclusion of current odds were likely to appeal to children and young people.

**Decision: Not Upheld:** ASA noted that gambling ads are permitted during live sports events providing the specific content of the ad is compliant with the Code. ASA considered that the style of the ad and presentation of live in play odds was likely to be of interest to an adult audience rather than younger viewers. ASA considered the ad was unlikely to be of particular appeal to most under 18s and was therefore not irresponsible or likely to cause harm to children or young people.

#### **Research Findings:**

A well-recalled and generally positively-received advertising campaign. Respondents generally liked Ray Winstone and found him an interesting and appealing character:

*"This is the male equivalent of the bingo ads for women. Here you've got Ray Winstone saying 'Come on lads, put a bet on'" (Male, Family-stager, 41-60)*

*"Ray Winstone is your archetypal geezer – he has 'respect'; he's no-nonsense, strong, firm, direct...." (Male, Family-stager, 26-40)*

The advertising was seen to be targeting experienced gamblers, with existing betting habits and a sophisticated understanding of odds:

*"Other ads, like the Casino ad with all the beautiful girls, give a false impression. This one doesn't. It's only speaking to people who are already gambling. It's not putting pressure on people to gamble in the same way" (Male, Family-stager, 41-60)*

None felt that the 'bet now' message was overly aggressive, although it clearly appealed to some of the respondents:

*"This is quite exciting, makes me want to have a bet – and I have responded to this type of ad before, but how could a child do anything about it?" (Male, Family-stager, 26-40)*

*"It makes the game more exciting, but unless you have a real gambling problem, it's not going to have a bad impact..." (Male, Family-stager, 41-60)*

Some of the regular gamblers were concerned that the use of a computer-generated, gaming-style of presentation might make the advertising attractive to children and young people, but this was a minority view.

Overall, seen as:

*"Pretty factual – it's preaching to the converted. It's saying 'if you like a bet, go on knock yourself out'. It's pretty simple and basic" (Male, Single, 18-25)*

Responses to the ASA judgement were very consistent. The ASA's view was seen as sensible and correct. Many of the respondents were incredulous at the nature of the complaint.

## 8.5 TSE Gibraltar: Betfair Cash-out Football - TV advertising



### Complaints:

1. The complainant challenged whether the ad was irresponsible because it linked gambling with the consumption of alcohol.
2. The ASA challenged whether the ad portrayed socially irresponsible gambling behaviour.

### Decision: Not Upheld in either case

1. The ASA noted that no-one in the ad appeared to be inebriated and there was no implication that irresponsible drinking was taking place. ASA considered that the portrayal of alcoholic drinks was incidental and was not focused upon in the ad.

The main character in the ad was not seen drinking and although he was portrayed to be excited and nervous at times, he did not appear to be gambling under the influence of alcohol. For these reasons ASA concluded that the ad had not irresponsibly linked gambling with alcohol.

2. ASA noted that he was not betting on large sums and that he did at other times engage with his friends and the other people in the pub. ASA did not consider that there was any indication in the ad, either through its setting in a pub or through its depiction of an excited user of the betting app, that the main character was a problem gambler.

Because the ad portrayed a scene that would be common to many users of the betting app and did not show or imply problem drinking or gambling, ASA concluded that it had not breached the Code on these grounds.

### **Research Findings:**

All the respondents recalled this advertising, which was seen as engaging and effective:

*"It summarises the whole idea of betting. It's quite intense and it shows the product off well. It shows the buzz" (Male, Single, 18-25)*

The message was also seen to communicating the idea that gambling can be fun even if it involves smaller sums of money and that risk can be reduced by using cash-out:

*"The message? You can still have fun and make money. You don't have to lose a bomb risking it" (Male, Family stager 26-40)*

*"They are saying it's less risky this way. It's a new dynamic. You can quit while you're ahead. It's actually pretty responsible gambling really" (Male, Single, 18-25)*

Few believed that this is targeted at children or young people in any way (some mentioned that, after all, it is set in a pub). Equally few believed that it promotes reckless behaviour (since the sums involved are small, no one is obviously drinking or drunk and the player has an option to accept his winnings and stop gambling):

*"It's an adult situation, with adults enjoying themselves watching sport in a pub. There's nothing wrong with that. It's normal" (Male, Family stagers, 26-40)*

The respondents overwhelmingly agreed with the ASA's judgements in both cases (which most felt was a 'triumph of common sense'). None saw the setting for the advertising as inappropriate or the behaviour itself as irresponsible:

*"It's an adult social thing, adults go to the pub and adults like to have a bet. Nothing in this ad shows anything that is wrong or bad" (Male, Family stagers, 41-60)*

## 8.6 The Health Lottery - TV advertising



### Complaints:

1. Complainants objected that the ad was irresponsible, because they believed it suggested peer pressure to participate in the lottery or disparaged abstention.
2. Complainants objected that the ad was irresponsible, because they believed it exploited vulnerable people.

### Decision: Upheld on both counts:

#### 1. Upheld

The ASA understood that there were two meanings of the word "loser", as it related to the featured people who had "lost" items that they could have purchased had they participated in the draw and won, and as it related to them as having failed because they had not participated in a draw that they could have won. ASA considered that the message of the ad was that these people had failed and lost out because they had not participated in the Wednesday draw. ASA also considered that the term "loser" was a pejorative term and some of the featured people calling themselves "losers" appeared distressed or frustrated by their lack of participation in the draw, and one shouted "loser" directly at viewers which ASA considered would be interpreted as suggesting that viewers were "losers" if they did not participate. ASA therefore considered the ad disparaged abstention from the Wednesday draw and concluded that it breached the Code. On this point the ad breached BCAP Code rules 1.2 (Social responsibility) and 18.2.5 and 18.4 (Lotteries).



## 2. Upheld

Some of the characters appeared to be distressed or frustrated by their lack of participation in the Wednesday draw, while one shouted "loser" directly at viewers. ASA considered that the term "loser" was a pejorative term and that, in the context of the ad, was likely to exploit the susceptibilities and credulity of vulnerable people by suggesting that if they did not participate in the draw they had somehow failed. ASA therefore considered that the ad was socially irresponsible and concluded that it breached the Code. On this point the ad breached BCAP Code rules 1.2 (Social responsibility) and 18.4 (Lotteries).

### Research Findings:

Although all were familiar with the Health Lottery, none had seen this advertising.

A complicated and oblique advertising approach, which many respondents did not understand. Some spotted that the underlying message is 'don't lose out by missing the midweek draw', but a majority were confused:

*"That's a bit stupid. I thought it was an anti-gambling ad to start with but then I switched off" (Female, Single, 18-26)*

The general feeling was that this advertising approach is very negative and depressing:

*"It seems to be rather patronising about less well-off and vulnerable people. They look miserable and bored. Somehow it seems to be saying that they're gullible and stupid" (Male, Family stager 26-40)*

There was great confusion around the use of the word 'health' in this context. Some assumed an NHS connection, which was considered inappropriate.

Some also believed that the approach was overly aggressive and bullying:

*"It's a strange advert, seems to be saying that if you aren't playing this lottery you're a total loser. It's not a very nice way to deal with people" (Female, Family stager 26-40)*

In general the campaign was seen as miserable and broadly unappealing (with some speculating that it must be targeted solely at existing Health Lottery players):

*"It's daft; it can't be looking for new customers, just repeat customers. People who already play on Saturdays. This takes too much thinking about..." (Male, Family stager 26-40)*

Overall, a majority of respondents agreed with the ASA's judgement in both cases, although some were more dubious about the idea that it disparages abstention (since quite a few respondents interpreted the advertising as being anti-gambling in its intention). There was also debate around the reality of peer pressure in relation to playing a lottery game, since some were certain that lotteries are not essentially a social activity.

### 8.7 Netplay: Supercasino - TV advertising



**Complaint:** The Gambling Reform & Society Perception Group (GRASP) and one member of the public challenged whether the ad was irresponsible and glamorised gambling.

**Decision: Upheld:** The ASA considered that the main character in the ad appeared to be treated with admiration by the other characters, some of whom appeared to fall into step behind him forming the impression of an entourage. ASA also considered that the ad gave the impression that showing his casino chip secured entry to an exclusive club for the main character and his acquaintances, as the building had a velvet-cordoned entrance and smartly dressed doorman. ASA considered that the camera angle used to show the glance between the main character and the female he passed en route to the roulette table, created the impression of a meaningful look between two people who found each other attractive. ASA considered that the references to fame, being special and VIP status in the soundtrack, combined with the admiring way in which the main character was treated by the other characters, linked gambling with recognition, admiration and enhanced attractiveness, and ASA therefore concluded that the ad breached the Code. The ad breached BCAP Code rules 17.3.6 (Gambling) and 17.3.7 (Gambling).

## Research Findings:

An unfamiliar campaign, which a majority of respondents disliked almost immediately. It was seen as very obviously targeted at men and selling a glamorous casino lifestyle which has overtones of the criminal underworld:

*“There are bouncers on the door, good old aggressive hip-hop music and lots of guys walking about with girls on their arms. Got to be a gang hide out hasn’t it?” (Female, Family stager 26-40)*

All believed that the advertising intends to make gambling in a casino appear glamorous, sexy and aspirational, especially to younger male gamblers:

*“The message is that you can be successful if you gamble, they’re selling a dream; it’s a fantasy lifestyle being a high roller...” (Male, Family stager 26-40)*

*“It certainly says that gambling will make you cool” (Male, Family stager 41-60)*

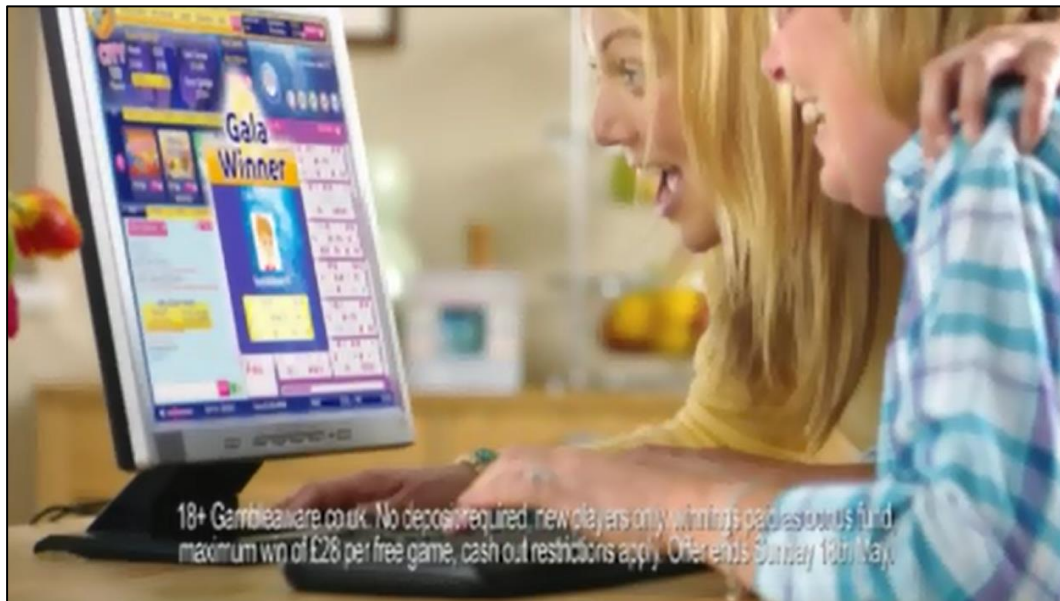
Most assumed that this was a teaser to encourage existing problem gamblers to become even more heavily involved in gambling:

*“The song ‘I want to be famous’ gives the connotation that you can achieve the superstar lifestyle. I think get a life because you’re not going to be famous you’re going to be sitting in your underpants with a laptop betting!” (Male, Family stager 26-40)*

All saw this advertising as only suitable for very late night showing (after midnight for some). While none of our respondents believed that it would have any impact on their own attitudes or behaviour, most felt that the intention was to glamourize gambling and attract vulnerable problem gamblers or impressionable younger people.

There was strong agreement with the ASA’s judgement in this case. The advertising was considered manipulative and inaccurate.

## 8.8 Gala Interactive: Bingo - TV advertising



**Complaint;** Two complainants objected that the ad irresponsibly promoted gambling by implying it could make you feel good about yourself. They were concerned that it failed to mention any of the downsides of gambling.

**Decision: Not Upheld:** Although the ad presented playing bingo on the website in a positive light and showed the women were happy to have won, it did not imply that they were spending money they couldn't afford to lose, that gambling enhanced their personal qualities or that players were guaranteed to win. The ad included the gambleaware.co.uk information in line with the gambling industry's voluntary code and the BCAP Code did not require any further warnings to be included. The ad was unlikely to be seen as displaying, encouraging or condoning irresponsible gambling behaviour and no further ASA action was required.

### Research Findings:

A little-known campaign that irritated many of the female respondents. It was seen as sexist, clichéd and rather misleading (since not everyone can win and it cannot be free to play).

Although the tone was light-hearted, the underlying message about winning was seen as inaccurate, suggesting that the target for the campaign may be more credulous, less sophisticated younger women with little actual experience of bingo:

*"A bit of an exaggeration" (Female, Family stager 26-40)*

*"It's tacky, cheesy, OTT, happy clappy – reminds me of OK magazine or a Benidorm holiday. It's suggesting you're going to win every time and it's free. There's a buzz!" (Female, Family stager 41-60)*

Overall, a majority broadly agreed with the ASA's judgement in relation to the advertising implying that gambling can make people feel better about themselves. There was, however, debate around the issue of whether the advertising does imply that winning is the norm and that playing is free:

*"I picked up that it says 'win every time you play'? Surely that can't be true?" (Female, Single 18-25)*

### 8.9 Cassava Enterprises: 888 Casino - TV advertising



**Complaint:** The complainant challenged whether the ad was misleading, because he did not believe the terms and conditions of the offer had been made sufficiently clear. In particular, he was concerned the ad did not state that consumers would need to wager £600 before they could withdraw the maximum £20 winnings.

**Decision: Not Upheld:** ASA closed this informally (without publication) because Clearcast agreed to amend the ad to state that bonus wagering requirements of 30 times the bonus amount apply before any winnings can be withdrawn

#### **Research Findings:**

A little-known advertising campaign, which generated little general appeal across the sample. Shane Warne was seen as having much less charisma than Ray Winstone and to appear rather 'cardboard' in this execution.

The primary campaign message was taken to be 'get £88 to play with', which concerned some respondents (and one respondent had been 'taken in' by this offer):

*"£88 is very appealing to some people because so much larger than the norm, it's a big enticement. Once you're gambling with someone else's money rather than your own that's what can get people hooked" (Male, Family stager, 41-60)*

*"The £88 free bet is a lot more money than you'd get on any other betting website. They pushing that a lot" (Female, Single, 18-26)*

The visual appearance of the campaign was confusing to many, some of whom wondered about the relevance of the dinosaur.

However, the visual appearance of the advertising (a computer simulation or video game setting) was seen as likely to appeal to younger people:

*"My teenage son saw this and it obviously stuck in his mind – I was talking about having no money and he said 'you should go on 888.com'" (Female, Family Stager, 41-60)*

There was broad agreement with the ASA's decision in this case, with a majority of respondents believing that correcting a misleading message is important.

#### **8.10 News Promotions: Fabulous Bingo - TV advertising**



**Complaint:** The Gambling Reform & Society Perception Group (GRASP) challenged whether the ad irresponsibly linked gambling to seduction, sexual success and enhanced attractiveness.

**Decision: Upheld:** The ASA considered that because the ad featured such an overt transformation from dowdy to glamorous as result of playing the branded bingo game there was, as a result, an implication that playing the branded bingo game could result in enhanced attractiveness and an improvement in self-image. ASA therefore considered that the ad directly linked the online bingo game with enhanced attractiveness and concluded that the ad breached the Code. The ad breached BCAP Code rules 17.3.6 and 17.3.7 (Gambling).

### **Research Findings:**

Very few respondents had seen this advertising. Most dismissed it as cheap, clichéd and overtly sexist in content. It was seen as clearly targeted at young women.

The use of a transformation scene and the inclusion of a handsome male character clearly implied to most that the message is about participation in bingo making you more attractive and sexually appealing.

Despite the consistently-identified issues with sexism and over-claim, many respondents dismissed the advertising as silly, rather than harmful:

*“It’s a bit of fun really, but I can’t get over the constant focus on women and bingo: don’t any men go to bingo then?” (Female, Single, 18-26)*

As a consequence, although all agreed that the ASA was right to uphold the complaint, some found this ‘a bit harsh’:

*“But you have to draw the line somewhere, it didn’t offend me, but what it is saying is not right really” (Female, Single, 18-26)*

## 8.11 Paddy Power Bingo - TV advertising



**Complaint:** The complainant challenged whether the ad condoned deceiving a husband in order to gamble because they believed the ad showed a wife happy to have her husband removed to play bingo.

**Decision: Not Upheld:** Although ASA acknowledged that some viewers may find the ad distasteful, we noted the voice-over stated "make the most of your 'me' time..." and that the ad did not state or indicate that the husband was unaware of his wife's gambling. As such, ASA did not consider the ad likely to be seen as condoning the deception of a family member in order to gamble. In the context of the ad, ASA considered that the majority of viewers would be likely to interpret the woman as happy to have some time to herself, rather than to portray her as wanting to hide her gambling from her husband. ASA did not object to the ad for the reasons suggested.

### Research Findings:

A few respondents had seen this advertising in various forms. It was widely seen as light-hearted and fun in tone, although some respondents were clearly confused and did not understand the advertising message on first watching.

Few felt that the advertising was in any way offensive:

*"The ad could actually be seen as empowering women. It shows women as strong, which is rare" (Female, Single, 18-26)*



There was little debate about the suitability of this advertising and all the respondents agreed with the ASA's response. Some were incredulous that the complaint had actually been made:

*"I can't believe they took this complaint seriously. How gullible do people think that the public is?" (Female, Family stager, 26-40)*

### 8.12 Tombola - TV advertising



**Complaint:** *"The ad features a variety of different groups experiencing and enjoying activities, mainly outdoors. This has nothing to do with online gambling and actually implies that it's a social 'real world' activity, when in fact it's actually a solitary activity. I believe this is false advertising because it has nothing to do with the product itself."*

**Decision: Not Upheld:** ASA noted that the voiceover made clear what the nature of the product is and that although the scenes do not have an obvious link to gambling, this is sufficient information to ensure that viewers are not misled, or for ASA to deem the ad irresponsible.

#### **Research Findings:**

Most respondents had seen this advertising, which many found confusing. The outdoor images evidently suggested that the advertising is concerned with holidays and outdoor leisure activity:

*“It’s a bizarre ad really – why all the bikes and outdoor stuff? Makes no real sense to me I’m afraid” (Female, Single, 18-26)*

A significant disparity between the campaign’s visual content and the actual sponsor meant that many respondents had simply dismissed the advertising as irrelevant.

When probed, a majority believed that it is misleading to link outdoor leisure activities with gambling, which was agreed to be largely a solitary activity (especially online gambling). Few, however, could see how this link might negatively impact upon people or encourage harmful gambling. In the main, respondents believed that the advertising would simply fail to have impact:

*“It’s just going to have benefits for Centre Parcs isn’t it? It’s advertising their product, not bingo. I think this is just a daft campaign really, but not harmful” (Female, Family stager 26-40)*

Respondents agreed with the ASA’s judgement, which was seen as very sensible and balanced. Few felt that anyone would be likely to be misled by the advertising.

### 8.13 Trinity Mirror: Daily Mirror: ‘Free £5...’ - Press advertising



**Complaint:** The complainant objected that the ad was irresponsible, because it was likely to appeal to children.

**Decision: Upheld:** The ASA were satisfied that the ad had not been directly targeted at children or young people. However, the Code stated that marketing communications for gambling products should not be likely to be of particular appeal to children or young people, especially by reflecting or being associated with youth culture. ASA considered that the depiction of the popular comic book character was likely to have particular appeal to children and young people, regardless of the context in which it appeared and therefore concluded that the ad breached the Code.

#### **Research Findings:**

This was seen as a very common form of advertising, with limited standout, although the ‘free £5’ did have impact for younger men. The pay-out level (£250,000) was not seen as realistic or credible by most.

Broadly, communication of the competition offer was seen as clear.

However, respondents quickly spotted the use of a Transformers character, which was immediately seen as inappropriate for gambling advertising of any type.

There was, consequently, complete agreement with the ASA's judgement in this case and all agreed the advertising should have been banned.

## **9. RESPONSES TO IMPORTANT QUESTION AREAS**

### **9.1 Overview**

While a majority of the respondents consistently expressed concerns about the potential impacts of gambling (and indeed other topics such as alcohol) advertising on children, it was also clear that most believed it is the responsibility of parents to control what children see on TV. If inappropriate adult advertising is placed around children's programming then all would see this as wrong and likely to be harmful. However, there was an equal belief that advertising for legitimate leisure activities such as gambling should be able to be shown at suitable times, following appropriate placement protocols.

There was a broad recognition that gambling can cause harm and that vulnerable people require a degree of protection from overly-aggressive or inaccurate advertising. Nonetheless, a majority of the sample clearly felt that overly protective approaches to preventing harm are generally unnecessary and unreasonable. Most felt that a 'common-sense' approach would sort out most issues around gambling advertising. Responses to the target advertising tested in the research showed an essentially libertarian inclination on the part of a majority of the sample, with a rejection of political correctness or 'nanny state' interventions.

### **9.2 Feelings about timing and placement of gambling advertising**

The sample typically agreed that gambling advertising should only be placed around obviously adult programming, although this was recognised to include some daytime TV slots, as well as after the 9pm watershed. Bingo advertising was seen as more broadly acceptable and less overtly aggressive than sports or casino betting advertising (some of which was only felt to be suitable for late-night showing).

### **9.3 Feelings about children's exposure to sports betting (particularly on TV)**

Respondents typically felt that parents are responsible for monitoring and controlling what their children see on TV. Provided that gambling advertising of any type is not shown during programming slots that are targeted at children - which would involve

parents watching this with their children - then it was seen as the parents' responsibility to manage exposure.

Showing gambling advertising around major sporting events was seen as unlikely to be very harmful to children. Respondents pointed out that advertising for alcohol and other adult pursuits is common around these events and most believed that it is up to parents to manage how their children are exposed to this type of ad. Many respondents pointed out that children would be completely unable to respond to advertising concerning online betting or odds: *"so it's not really a practical problem, they can't do anything about it."*

#### **9.4 Feelings about children's exposure to bingo advertising**

Few respondents were concerned about exposure to bingo advertising, which was seen as typically light-hearted and visually different from the traditional presentation of gambling advertising in the context of sports. The cheerful, sociable style of the bingo advertising shown in this research was seen as unlikely to have any significant impacts on children's attitudes or behaviour.

Some of the general public sample were clear that the Foxy bingo advertising would certainly appeal to their children, because it features a colourful animal character, recognisable figures (lollipop lady), music and dancing. Despite this, none could see how the advertising could have any harmful impacts on their children: *"in the longer term it might stick in their mind, who knows? But in the short term it's nothing more than a bit of fun."*

#### **9.5 Feelings about whether TV Bingo ads are leading people to websites where harder forms of gambling are promoted?**

A majority of the general public sample lacked sufficient experience and were unable to answer this question. Most suspected that using any form of online gambling channel would increase exposure to a wider selection of gambling opportunities.

However, the regular gamblers confirmed that they had personal experience of being exposed to a broader range of gambling opportunities by accessing bingo websites. Some had tried online casino gambling as a consequence of signing up to bingo websites. None saw this as harmful, however, and reiterated their view that that all gambling behaviour is a matter of personal choice.

#### **9.6 Feelings about whether advertising encourages gambling in such a way that could lead to increased problems in vulnerable groups**

There was virtually unanimous recognition that gambling advertising might affect vulnerable individuals in a negative way. However, most felt that virtually all advertising

can lead to potentially damaging life choices and behaviour – so where should the line be drawn? There was a strong and consistent belief that media content cannot be solely shaped by the sensitivities of vulnerable groups and respondents were clear that ‘censoring’ any type of media (including advertising) because someone might be harmed is unacceptable. All felt that common sense is required to assess whether advertising is being deliberately targeted at vulnerable groups in order to exploit them (in which case most felt that it should be banned) or is broadly offensive.

### **9.7 Feelings about ‘aggressive’ advertising that ask people to “Bet now!”**

Again, the general public sample could only speculate about this type of advertising. None had been inclined to respond, but imagined that some impressionable younger people or problem gamblers might be affected. Again, gambling advertising was seen as no different to variety of other advertising that might be inappropriate for some audiences in some situations.

In fact the regular gamblers confirmed that they were motivated by this type of advertising and seeing advertising of this type strongly inclined them to take action and bet.

### **9.8 Feelings about whether “free bet” offers and other sales promotions encourage consumers to gamble**

The general public believed that ‘free bet’ and ‘free money’ seemed very likely to appeal to younger people and to make them interested in gambling. Most were, therefore, quite cautious about how this type of offer would be used and where associated advertising might be placed.

Again, the regular gamblers confirmed that most of them had been attracted by offers in the past and continue to be so (in fact, a gambling system used by one of the respondents is based around trading free bets on betting exchanges for profit). One respondent has thirty-two online bingo accounts, all opened to take advantage of free play offers.

## **10. FEELINGS ABOUT THE ASA**

The ASA was reasonably well known across the sample, who were peripherally aware that an ‘official’ body polices advertising. There was some confusion with Ofcom, who are perhaps more high-profile in the media, but most respondents claimed to have heard of the ASA.

Having been exposed to a number of examples of the ASA’s judgements concerning different pieces of advertising, the sample were very positive about the work of the ASA.

They strongly supported the Code of Conduct as shown during this research (although none were previously aware of it) and felt that this should be enforced at all times.

The ASA's judgements were seen as:

- Correct
- Thoughtful and well considered
- Fair and balanced
- Sensible.

If anything, the general public might have taken an even more relaxed approach to some of the advertising, while nonetheless acknowledging that the ASA had applied the code correctly in all cases.

A majority of the sample were genuinely astonished by some of the complaints made and had serious questions about the motives of the complainants.

## **11. CONCLUSIONS**

The research indicates that:

Our pre-task diary exercise showed that people are exposed to far more gambling advertising than they might have assumed. Younger men and older women from lower socio-economic groups clearly see a great deal of gambling advertising (primarily as a consequence of the prevalence of bingo advertising on daytime television). Younger men who are interested in sport were very aware of advertising from brands such as bet365, Betfair, Bet Victor, Ladbrokes and William Hill. The groups seemingly taking least notice of gambling advertising are younger single women and more middle-class family-stage women.

Attitudes towards gambling advertising were characterised by competing responses. Initially gambling was broadly acknowledged to be potentially harmful, with protection from gambling advertising needed for children in particular. Conversely, however, a majority of respondents simultaneously held a parallel view which states that gambling is a common and relatively normal leisure pursuit, which can be enjoyed responsibly. There was resistance to the idea that advertising for gambling should be specifically targeted for constraint, given that people believed there are many other more obviously dangerous activities which are present in the TV universe (including violence, sexual behaviour and alcohol, all of which are felt to be represented in a wide range of advertising).

A majority of respondents were inclined to be relaxed in relation to the gambling advertising that was tested in this research. Provided that it is not misleading, inaccurate

or specifically targeted at children, then few were inclined to be harsh in their judgements.

The type and nature of the complaints made about the target advertising were a genuine surprise to many in the sample. Respondents typically felt that the complaints were exaggerated and represented very specific positions and perspectives in relation to gambling and the promotion of gambling. Only the Trinity Mirror press advert featuring a Transformers character was universally felt to unacceptable, since it was clearly likely to appeal to children. Otherwise many respondents were inclined to see the ASA's judgements, although viewed as correct, as erring in the direction of being overly harsh.

The ASA itself was reasonably familiar to many respondents, although its specific role and relationship with other, perhaps more high-profile, organisations such as Ofcom was not fully understood. After seeing the response of the ASA to the target advertising, many respondents assessed the organisation to be sensible, considered and effective.

In the main, a majority of respondents agreed with the judgements made by the ASA in all cases, which they found appropriate and balanced.

The research also indicates that:

Feelings about the core research issues explored in the research tended towards a libertarian position. While there was no dispute about the possible harm that gambling might cause, this was broadly seen as a matter of personal responsibility and the protection of children from potentially harmful gambling advertising as the responsibility of parents. Ultimately, gambling was seen as a normal and acceptable leisure pursuit for most people.

The timing and placement of gambling advertising was viewed as relatively straightforward, with no gambling adverts to be allowed around children's programming and more hard core advertising dealing with casinos, for example, being shown after the 9pm watershed.

Children's exposure to sports betting was not seen as a significant problem. Respondents felt that there was no way for children to respond to such advertising and that advertising for other potentially harmful products (such as alcohol) is also in evidence around major televised sporting events.

Children's exposure to bingo advertising was seen as unlikely to cause harm. Much of this advertising was viewed as upbeat and colourful (which will appeal to children), but

essentially beyond the understanding of most children. The messages of such ads (sociability and fun) were seen as largely harmless.

The issue of TV bingo leading people towards harder forms of gambling was complex: although the general public doubted that this would be the case, the regular gamblers confirmed that many of them had, in fact, been drawn to other types of gambling (especially casino games) by accessing bingo websites.

Equally, the aggressive 'bet now' advertising, although seen as unlikely to be persuasive by the general public segment of the sample, did have an impact on the male regular gamblers, all of whom admitted to being affected to the point of '*wanting to have a bet!*'

Finally, the issue of the impacts of gambling advertising on vulnerable audiences elicited a broad debate about the degree to which the media universe of the ordinary population should be shaped by the potential sensitivities of vulnerable groups. In the main, our sample was aligned against censorship or control on this basis, unless the material is obviously distasteful, offensive or intended to manipulate or deceive.



## APPENDIX A: QUALITATIVE TOPIC GUIDE

***Please note: this guide is intended to guide the discussion however; the exact flow and question wording will be tailored by the moderator to best fit the individual research participants. Consequently, not all questions may be asked in the order below, or in the wording below. It is also likely that not all questions will be asked in each session, as we will ensure that the discussion follows the groups' own experiences and needs.***

### **Introduction:**

**Introduce self, Research Works Limited**, purpose of the session (to talk about a variety of issues including lifestyles and current affairs), also MRS Code of Conduct - respondent confidentially and permission to record the session

Respondents to be **encouraged to relax** and feel as though they are at home – moderator to emphasise that we are interested in any ideas or thoughts which they might have. There are no 'rights and wrongs' in this research

### **INTERVIEW: PHASE ONE**

This initial phase of the interview must be **non-directive and discursive** – the intention is to encourage the respondent to speak freely and follow their own thought patterns and internal agenda. The moderator must confine their input to a few introductory questions and open-ended prompts to keep the respondents talking, such as 'tell me more about that', 'what else?' 'how does that make you feel?' etc.

Interview to begin with a **general chat** to establish who the respondents are, what they are interested in and what types of issues currently concern them....

### **Group respondents' background:**

Name, age, current job, relationship status, hobbies/interests – what is a typical weekend for them?

### **Introduce TV stimulus (video reel):**

Moderator to tell the respondents that we are going to watch some TV and then talk about what we have seen – respondents to be encouraged to relax and watch in the same way that they would at home. This is not a test and no specific questions will be asked at this stage about what they will be watching

### **Show TV reel**

Moderator to start session by saying: 'tell me about what you have seen'... respondents **are to be allowed to 'free-form'** in terms of their responses, with the moderator simply acknowledging their thoughts and encouraging ongoing dialogue. Moderator to note

which issues, images and concepts are prioritised – as well as the type of language used and the emotional temperature of the engagement

Allow respondents to continue talking until the moderator is satisfied that they have said everything they want to (or are able to) say

### **INTERVIEW: PHASE TWO**

In this phase of the interview, the moderator can become **more directive and probe specific issues**. The following questions should be asked (taking account of – and being sensitive/sensible about - what respondents have already said and what has already been discussed/identified):

First, **unprompted** and thinking about the initial showing of the TV reel:

- Tell me about the advertising that you have seen – what **messages/brands/stories** stand out and why?
- **Why** does that stick in your mind, what makes it memorable?
- What do you specifically **like and dislike**?
- What is **relevant** to you and what is not? Why?
- **Who is advertising** and why? Who is the advertising aimed at?
- Any **awareness of specific issues or topics**? (looking out for mentions of gambling without prompting)

Then, show the TV reel for a **second time** and ask again:

- **Tell me again** about the advertising that you have seen – what messages/brands/stories stand out and why?
- **Why does that stick in your mind**, what makes it memorable?
- What do you specifically **like and dislike**?
- What is **relevant** to you and what is not? Why?
- **Who is advertising** and why? Who is the advertising aimed at?
- Again, any **awareness of specific issues or topics** (listening out for mentions of gambling messages or brands)?

Moderator to identify **relative impacts** of different advertising, brands and messages – specifically looking at how the target gambling advertising is talked about and what spontaneous comments are made about message, origin, impact, intent and appeal

### **INTERVIEW: PHASE THREE**

This phase of the interview will be a **'normal' research session**, with directed questioning and detailed examination of issues concerning each of the problem advertising executions provided by ASA (including TV and press)

Show each of the **target advertising campaigns** (rotate order – 8 ads to be shown to male groups, 9 ads to be shown to female groups), probing around:

### Existing awareness

- First, have they **seen this advertising before**? If so, what did they think of it? Has it had any **impact on attitudes or likely behaviour**? In what way? Have they talked about the advertising to anyone else? What was said?

### Impact and appeal

- Would this advert **catch your attention**? Why/why not?
- How **appealing** was this execution? What were the good bits?
- Were any parts **off-putting**? If so, which and why?
- Does this advert seem **relevant** to you? Why/why not?

### Communication

- What is this advertising **saying/trying to communicate**?
- Did you find this advertising **funny/entertaining/appealing**? Why/why not?
- Does this message **make sense** to you? Why/why not?
- What is this advert specifically **trying to achieve**? What makes you think that?
  - o *Probe: what is the advert saying about **gambling in general**?*
  - o *Probe: what is this advert saying about **gamblers**?*
  - o *Probe: what is this advert **asking us to do**?*
- Overall, how **clear** was the advert? What made it clear?
- Is this message **relevant** to you? Why/why not?
- **Who** is it aimed at?
- Is this an **appropriate approach** to advertising this message? Why/why not?
- How would you describe the **tone** of this advert? Who is speaking/delivering the message?
- Is this an **appropriate tone** for advertising this message? Why/why not?
- **Who is sponsoring this advertising** – probe: for clarity of source
- Can they **accept the message** of this advertising without suspicion? Why/why not? Does it have **resonance/sincerity**? Why/why not?

### Effectiveness/Call to Action

- **Who** do you think might be affected by this advertising? Why do you say that?
- Do you see this advertising having any **impacts on you or affecting your behaviour** in any way?
- If so, what **type of impact** do you think it might have?
- If not, why not?
- *Probe: to what extent do you think this advert might **encourage someone**:*
  - *to gamble?*
  - *to change existing feelings about gambling or gamblers?*
  - *to feel more positively about this type of gambling?*
  - *To be more interested in this type of gambling?*
- Does the advertising suggest any **potential harm or pressure**? In what ways? Why do they say that?
- Have they ever **responded to advertising of this type**? What were these and what prompted them to take action? What was the outcome?

**Specifically probe** around issues such as:

- **Timing and placement of this type of advertising:** when should it be shown? In proximity to what types of programming (i.e. big sporting events, daytime TV) or what type of publication (men’s or women’s magazines/tabloid press? Why do they say that?
- **Children’s exposure to sports betting** (particularly on TV): what impacts do you think this might have on children and why do you say that?
- **Children’s exposure to bingo advertising:** what impacts do you think this might have on children and why do you say that?
- Whether **TV Bingo ads** are leading people to websites where harder forms of gambling are promoted? Why do they say that?
- Whether ads encourage gambling in such a way that could lead to increased **problems in vulnerable groups**. Why do they say that?
- **‘Aggressive’ ads that ask people to “Bet now!”** – do they think this could cause harm or people to bet when they should not? Why do they say that?
- Whether **“free bet” offers** and other sales promotions encourage consumers to gamble? Why do they say that?

**FUTURE LEARNING:** (MODERATOR TO SHOW RESPONDENTS THE ASA’S RESPONSE TO EACH COMPLAINT REGARDING THE ADVERT)

Looking at the **ASA’s judgement in relation to this** advertising:

- How do they feel about the **ASA’s judgement** in this case? Why do they say that?
- What aspects do they **agree with** and why?
- What aspects do they **disagree with** and why?
- What would their **own judgement** have been and why do they say that?

**PRESS EXECUTION: PROMPT RESPONDENT TO LOOK SPECIFICALLY AT THE ASA’S TARGET GAMBLING EXECUTION:**

- **Initial impressions** – standout/impact/appeal
- What **aspects** of the advertising are creating this standout and impact?
- Looking at the **content of the advertising**, do they find it:
  - Credible? Why/why not?
  - Interesting? Why/why not?
  - Surprising? Why/why not?
- Do they **understand what is being communicated?** Why/why not?
- Would it be likely to make them **want to find out more?**
- Would they be likely to **take action?** Why/why not?
- Would they **change their existing gambling behaviour?** In what ways?
- Would they **change existing attitudes about gambling?** In what ways?

Looking at the **ASA's judgement** (*Moderator to show the respondents ASA's judgment*) in relation to this advertising:

- How do they feel about the **ASA's judgement** in this case? Why do they say that?
- What aspects do they **agree with** and why?
- What aspects do they **disagree with** and why?
- What would their **own judgement** have been and why do they say that?

### **(Very Briefly) Perceptions of The Advertising Standards Authority**

*For any aware of the ASA:*

- Do these judgements **fit with your impressions of the ASA**? Why/why not?

*If unaware of the ASA, ask from what they have seen tonight:*

- What do you think the **role of the ASA** is?
- Do you **trust** the ASA to do a good job? Why/why not?
- What do you think the **ASA is trying to do in its judgements**? Why is that?
- Do you feel that these judgements **fit with the ASA's role**? Why/why not?

### **Summing Up:**

Overall impressions of **gambling advertising and ASA's handling of complaints**

Moderator to briefly show the group the **advertising codes of conduct** for gambling advertising: *Ads for gambling must not:*

- *Portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm.*
- *Exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children, young persons or other vulnerable persons.*
- *Suggest that gambling can be a solution to financial concerns.*
- *Link gambling to seduction, sexual success or enhanced attractiveness.*
- *Be of particular appeal to children or young persons, especially by reflecting or*
- *being associated with youth culture.*
- *Feature anyone gambling or playing a significant role in the ad if they are under 25 years old (or appear to be under 25).*

**In summary**, having seen the advertising and discussed it:

- What do you think about the **gambling advertising that you have seen today**? Why do you say that?
- How **harmful** do you think the advertising is? To whom? Why do you say that?