

Submission to the Joint Select Committee on Gambling Reform

*Inquiry into the advertising and promotion of
gambling services in sport*

4 March 2013

Table of Contents

1. Introduction	1
2. Summary of the Foundation’s contribution to this inquiry	2
3. The extent and growth of sports betting and advertising	5
4. Community attitudes and fears regarding sports betting and sports betting advertising	6
5. Sports gambling and problem gambling, some context	8
6. Data and Feedback from services	9
7. Concluding remarks.....	10
References.....	11

1. Introduction

- 1.1. The Victorian Responsible Gambling Foundation (the Foundation) welcomes the opportunity to make a submission to the Joint Select Committee on Gambling Reform’s inquiry into interactive and online gambling and advertising.
- 1.2. The Foundation is an independent statutory authority and is governed by a Board. The Foundation began operating on the 1 July 2012 under the chairmanship of Professor Bruce Singh AM.
- 1.3. The Foundation’s legislated functions include:
 - the provision of [problem gambling counselling services](#)
 - conducting [community education and information campaigns](#) to support responsible gambling, raise awareness of risks associated with gambling and promote help seeking in relation to problem gambling
 - provision of information and advice to the community on the Victorian gambling environment via the [Gambling Information Resource Office \(GIRO\)](#)
 - undertaking [research and evaluation](#) activities.
- 1.4. Operating within a public health framework, the Foundation’s objectives are to reduce the prevalence of problem gambling and the severity of harm related to gambling and to foster responsible gambling. The work of the Foundation is therefore, clearly focused on identifying, understanding and ameliorating the harms associated with problem gambling in Victoria and fostering responsible gambling.
- 1.5. By funding treatment services in Victoria (Gambler’s Help) the Foundation has access to a wide range of data about people who seek and receive formal help for gambling issues. This includes the individuals as well as significant others in their lives including partners, siblings, and parents. This data, along with the Foundation’s research unit which commissions research and works with academics across Australia and the world, provides the Foundation with a strong knowledge base to inform our community education programs and improve treatment programs. The Foundation also works with the gambling industry to foster responsible gambling in venues . The Gambling Information Resource Office (GIRO) provides information about gambling legislation, regulation and research directly to the general public as well as to stakeholder groups such as local government, community sector organisations and the Victorian gambling regulator.

2. Summary of the Foundation's contribution to this inquiry

- 2.1. Sports betting and accompanying advertising have been increasing over the past decade with a significantly rapid rise taking place in the past three years.¹ It would seem the market is still far from mature and so rapid growth will continue. The rise of sports betting and advertising has occurred alongside, and to some considerable extent been driven by, the pace of technological change around internet enabled devices and software.
- 2.2. The increasing penetration of smart phones and other mobile devices means that potential markets for gambling over the internet are greatly expanded.² The mobile nature of the devices means gambling can happen anywhere, at any time. Gambling advertising has capitalised on the immediacy and easy access to gambling products. In the space of less than a minute, a person can receive a notification advertising or offering a gambling product and can act on that prompt without any time to reflect or consider the implications. The interactivity of the devices means that they can be both a mode for the delivery of advertising and accepting offers to gamble.
- 2.3. In this context of the promotion of growing opportunities and means to gamble, the Foundation sees protection from harm and the fostering of a resilient culture that takes a responsible approach to gambling as a major challenge.
- 2.4. The Committee's inquiry speaks to the ways in which gambling and sport are becoming intertwined. This is occurring in a manner which is transforming both the culture of sport and the culture of gambling. In the case of the former it would seem there are grave risks to both the integrity of sport and the public's enjoyment of it. In the case of the latter we are seeing gambling being offered on events, and in forms, that have not traditionally been part of our culture. The newness of these types of gambling, and the speed of change, may mean that Australian society has been caught unprepared. This experience of rapid change, and fear we are not prepared as a community to deal with it, may explain much of the anxiety and even anger that has been expressed in public conversation around sports betting.
- 2.5. In this submission, the Foundation puts forward its understanding of the impacts and issues that sports betting and sports advertising are generating, primarily for gambling awareness and behaviour. These views must have added to them the caveat that long term empirical evidence on the impact of sports betting is not yet readily available. Commercial confidentiality, differing data gathering requirements around the country, the time it takes to produce solid research, and the speed of change, all add difficulties to making reliable observations. However, a response is needed and the Foundation believes that there is an accumulation of evidence that, while taken individually, could only be indicative, presents a more persuasive picture when taken together.

¹ The arrival of the new internet corporate bookmakers as significant players can be traced back to 2002 – 2004 as gambling expenditure in the field measured in Tasmania and the Northern Territory, where they chose to base themselves, took off. See Gleeson 2011 p.9ff. Significant high court decisions in 2008 gave them rein to expand into the markets of other states.

² The Telstra Smartphone Index reported that in 2012 that over 52 per cent of Australian mobile users were using smart phones with biggest growth area in purchasing products ([French 3/12/12](#)) [Deloitte Access Economics](#) reported in February 2013 that there were now more than 30 million mobile services in Australia, around 8 million more than the total population.

2.6. The Foundation makes the following observations in relation to the growth of sports betting and advertising:

2.6.1. There is much resentment in the community about the extent of sports betting advertising and this centres on three concerns.

- That the experience of sport and the creation of a culture of gambling as integral to audience participation is having a normalisation effect
- That the industry's marketing strategies are having an impact on children in terms of both the normalisation effect and in creating a vulnerable or at risk gambling population among the young
- That there are impacts from gambling upon the integrity of sports, resulting in a change in the spirit in which sport is played via creation of incentives for corruption of outcomes.

2.6.2. While sports betting is a fast growing gambling market, which has its own share of problem gamblers this must be kept in context. For example, there is not yet evidence that sports betting creates problem gamblers at a rate comparable to pokies. The high growth rate in sports betting is also coming from a low base. As a proportion of all gambling in Australia, sports betting's share of gambling losses is still small, though reported to be growing at a compound rate of 14.7 per cent over the five years to 2011.³

2.6.3. The known profile of those gambling on sports betting is primarily young men in their twenties and early thirties. The evidence from prevalence studies might be said to be mirrored by analysis of the strategy being pursued by industry marketing.⁴ It is reasonable to presume that industry has done its own studies on where its marketing dollars should be directed.

2.6.4. In terms of gambling risk factors among the targeted consumers, young men figure highly in most studies of gambling. However, the group currently identified by research as the largest segment of sports gambling generally possess fewer risk factors than those playing pokies. Typically they place average or higher in terms of both education and income, the opposite of pokies players at risk or with problems.⁵ Against this there are concerns that

- a) identified problem and at risk gamblers have been found more likely than other gamblers to engage in sports betting; and
- b) evidence indicates that many others betting on sports may be new to gambling and therefore issues of their lack of awareness of risks, costs and knowledge of responsible gambling render them comparatively vulnerable.

2.6.5. There is a need for social marketing campaigns that increase awareness, highlight the risks and push back against normalising messages industry advertising disseminates. This is an area of action the Foundation is actively pursuing.

³ IbisWorld, 2012

⁴ See Thomas S, Lewis S, McLeod C & Haycock J, 2012

⁵ See Department of Justice and Attorney-General 2012

- 2.6.6. Concern for effects on children exposed to gambling advertising is legitimate. Sports betting advertising takes place in great volume during sporting events children are likely to be watching.
- 2.6.6.1. Research shows children under 11 struggle to distinguish differences between advertising and program content.⁶ Children under 10 in particular, struggle to see the persuasive intent that is in advertising.⁷
- 2.6.6.2. Additionally disturbing are results from recent research on gambling advertising that indicates it is being successful in creating an attitude in those aged 13-18 that gambling is 'entertaining, harmless and convivial'.⁸ Obviously for the Foundation the second of these attitudes is of concern since it undermines the development of a responsible approach to gambling.
- 2.6.6.3. While the removal of live odds promotion during major sporting broadcasts is to be applauded as a responsible gambling message other issues still exist. In particular, the use of sports stars or media celebrities to promote gambling, and the use of social media. In the case of the latter, research indicates young people have even more problems than with traditional media in separating marketing material from neutral content.⁹
- 2.6.7. In relation to social media, the potential for increased normalisation should be noted. Industry brands are engaging in marketing via use of peer groups based around gambling.
- 2.6.8. In addition to campaigns aimed at the general community and those vulnerable to gambling problems, the Foundation also believes parents need to be given tools and support to help to produce a resilience in their children that fosters a responsible approach to gambling. As part of this, the Foundation has already identified a need to produce accessible material that makes parents more aware and knowledgeable about the gambling environment, including its marketing strategies and the new ways that both marketing and opportunities to gamble are evolving.
- 2.6.9. There is considerable scope for improvements in the responsible gambling tools offered by industry. This relates to awareness and access to tools, and also the capacity and ease of use of the tools themselves. There is also scope for co-operation between industry and those concerned to reduce harm from gambling via the development of responsible gambling tools, also using the data they generate to inform and improve harm prevention strategies.
- 2.6.10. Information from the Foundation's counselling services databases, and feedback from counsellors on the ground, both provide indicative evidence that gamblers presenting for help with sports gambling are growing in total numbers and as a percentage of all clients. The reports back from the ground accord with empirical research indicating that the main problems are for young men and that mobile devices are the mode through which their gambling is taking place. Some feedback also noted that just the everyday use of mobiles is itself acting as a trigger, prompting an urge for problem gamblers to place bets.

⁶ See Department of Justice, 2009, p, see also Brand E, 2007, p. 5

⁷ See Carter et.al. 2011; Rozendaal et.al. 2011

⁸ McMullen et.al. 2012 p.843

⁹ See Blades et.al. 2013, Ali et.al 2009 and Brand E, 2007, p.7

- 2.7. In conclusion, the Foundation would say that addressing harm and promoting responsible gambling is a matter for more than one party. Industry has a role to play as much as all levels of government, as well as counselling services and statutory bodies such as the Foundation.
- 2.8. Some sporting associations, particularly the major team codes, have an important role and big decisions to make. Across the spectrum of sport, horse and greyhound racing are currently the only sports that exist entirely for gambling. Without gambling they would hardly persist. The opposite has been the case for the major codes of football and the cricket. Revenue from gambling on their events has traditionally been marginal to their activities. The degree to which this continues to be the case is crucially dependent on decisions that being made by sporting codes now and in the immediate future.

3. The extent and growth of sports betting and advertising

- 3.1. Sports betting has exploded since 2008 with sports betting agencies exercising their rights to operate and advertise across state borders by taking advantage of the internet. Traditional bookmaking arrangements of in states such as Victoria have undergone changes because of this. Types of gambling, and levels of access to gambling, have both changed radically. In this newly borderless world regulation of gambling and gambling advertising by states has in some cases entered gray zones that await High Court rulings.
- 3.2. Accurate and reliable figures on the extent of sports betting are difficult to find. Estimates of spending vary, but they commonly put it at below 2 per cent of Australia's total expenditure on gambling (by contrast gambling on pokies makes up around 60 per cent of spending). What is clear is that the market is growing rapidly from its low base pre-2008 and continues to steadily increase its share of total gambling expenditure in Australia. A recent report by IBISWorld claims that it is growing at a compound annual rate of 14.4 per cent per annum.¹⁰ Moreover, both Roy Morgan and IBISWorld estimate that sports betting, along with casinos, is one of the forms of gambling that is growing rather than contracting.¹¹
- 3.3. How long this can continue before the market 'matures' is an unknown, but with local and international corporate bookmakers still pursuing major investments in marketing strategies it can be expected there are still some years of this growth to run.¹² The annual reports of major corporate bookmakers in Australia such as Paddy Power (Sportsbet), Sportingbet and Betfair¹³ all show confidence in continued growth and the efficacy of advertising to drive that growth.
- 3.4. The growth of the industry is being driven by advertising, and there has been a particular focus on what might be called mainstream advertising.¹⁴ This entails signage at grounds, print and radio advertising and the use of free-to-air television. Such advertising is oriented towards mass audiences, no doubt reflecting a search for new consumers and the establishment of brand recognition among potential customers.

¹⁰ IBISWorld, 2012

¹¹ Ibid; Roy Morgan Research, 2011

¹² The [Australian Racing Fact Book 2012](#) shows sports betting turnover rising from \$880 million in 2000/01 to \$1.8 billion in 2006/07, reaching \$3.3 billion in 2010/11 (p.69). A recent Merrill Lynch study is reported as stating sports betting turnover will reach \$4.5 billion this financial year, with losses at \$410 million ([Kruger K, 'Stakes are high in sport's great gamble' Sydney Morning Herald, 13 February 2013](#)).

¹³ Paddy Power plc Annual Report 2011; Sportingbet plc Annual Report 2012; Betfair 2012 Annual Report

¹⁴ See for example, the 3D Paddy Power plc 2011 Annual Report.

- 3.5. One indicator of this is the amount of spending on advertising. A recent study by Ebiquity was reported by *The Australian* as recording an increase in television advertising from \$12 million in 2010 to \$45 million in 2012.¹⁵
- 3.6. Frequency of advertising is also important. The Ebiquity report noted that sports betting ads were played 20,000 times on free-to-air TV in 2012. If it is assumed that these were 30 second ads it means that there was an average of 27 minutes of such ads every day of the year. It is thus not surprising that the public perceives itself as bombarded by gambling advertising.
- 3.7. A study published in 2012 into marketing at AFL matches, on TV and at stadiums, found that while exposure to advertising through TV was high, it was even higher at stadiums. Indeed the incidents of gambling advertising were actually greater in time consumed than the actual time it took to play the game.¹⁶
- 3.8. To recognition of the extent of mainstream advertising must be added awareness of the other channels the gambling industry uses to reach customers and the interactive nature of these channels. Sports betting is increasingly accessed and advertised via the internet using mobile devices. The role of mobile devices, sports betting apps and use of social media in marketing strategies, are all contributing to the creation of intensive gambling environments. Environments where opportunities to gamble and promotion of gambling can coexist in a continuous manner, becoming ever present.

4. Community attitudes and fears regarding sports betting and sports betting advertising

- 4.1. This submission will not dwell at length on the anxieties and objections raised in public discourse in relation to sports betting, any survey of media discussion of the topic will yield a large majority of negative comments.¹⁷ The Foundation does note that the objections to sports betting are usually closely linked not to the extent of sports betting but the extent of the advertising. The Foundation acknowledges concerns may be raised around both but will also in subsequent sections attempt to put the former in more context.
- 4.2. Some poll results on attitudes to gambling advertising
 - 4.2.1. A nationwide poll of Australian conducted by the ANU in 2011 found that 46 per cent of Australians thought gambling was advertised responsibly while 69 per cent thought it should be discouraged and 84 per cent thought there were too many opportunities to gamble.¹⁸

¹⁵ Jackson S, 'Waterhouse leads pack in online betting ad splurge', *The Australian*, 25 February 2013. The report noted that \$25 million of the \$45 million was attributed to aggressive marketing by bookmaker Tom Waterhouse and that much of this was speculative. However, even if all his spend is discounted as speculative advertising investment made on credit, the remaining amount of \$20 million still means the industry was able to embark on an 80 per cent increase in spend in just two years.

¹⁶ Thomas S, Lewis S, Duong J & McLeod C 2012, p.148

¹⁷ See also RGAC, 2011 p.8

¹⁸ ANU Poll, 2011 Note that the questions on gambling advertising did not specify sports betting advertising though this would have been the most visible form of advertising at the time

4.2.2. A Newspoll national survey commissioned in 2011¹⁹ found a number of strong community views

- 36% wanted to ban sports betting agencies from sponsoring sporting teams or events
- The younger generation was less concerned about marketing practices of sports betting agencies
- 42% believed that giving odds during live sports coverage should be illegal
- 63% of those aged 18 to 64 believed that advertising by sports betting agencies increased problem gambling
- One in ten of those surveyed stated that this form of advertising was more harmful than alcohol or tobacco equivalents.

4.2.3. A self-selecting internet poll run by the Herald Sun and Channel 7, also in 2011, found that from 46,000 responses 63 per cent thought that gambling advertising during football broadcasts was too intrusive.²⁰

4.2.4. The recent Queensland Household Gambling Survey found that

- 51 per cent of adult Queenslanders agreed that ‘there should be a national ban on advertising gambling at sports grounds’.
- 44 per cent of adult Queenslanders agreed that ‘there should be a national ban on sporting team sponsorship by gambling companies (e.g. betting agencies)’.²¹

4.3. Overall a survey of comments made in the public discourse yields the following areas of concern:

4.3.1. That the advent of sports betting is changing of the nature of the experience of sport. That it is impacting on the younger generations’ understanding of sport and its values in a negative manner. There is a fear that a culture is being created where gambling is seen as integral to sport and that gambling is a way of participating in sport.²² This perceived change is often cast as the “normalisation effect”.

4.3.2. That children are being too exposed to the industry’s marketing strategies. This relates to advertising being perceived as relentless while children are watching sport. It also relates to logo placement and sponsoring of sporting clubs and the use of sporting stars to promote gambling brands. The impact of this is seen as having the aforementioned normalisation effect, and this is linked to a fear that over time this will create a young adult population susceptible to problem gambling and gambling related harm. The Foundation would agree that there are concerns for new generations of gamblers in

¹⁹ Crossman Communications, 2011

²⁰ Herald-Sun 7 News [Footy Fans Survey](#) Results 2011

²¹ Department of Justice and Attorney-General 2012, p. 86

²² See for example Samantha Thomas et.al 2011

new gambling areas. This is because there are doubts that the existing culture has provided awareness of risk and guidelines for responsible gambling in these areas. This is a challenge thrown up by the speed of the arrival of sports betting and associated advertising, combined with delivery via the new digital mediums.

- 4.3.3. That there will be an impact upon the integrity of sports, resulting in a change in the spirit in which sport is played. This will happen via creation of incentives for the corruption of outcomes. The fear is that if sport becomes dependent upon gambling, and gambling is linked to outcomes from sport, the nature of the games and the motivations of the athletes will come under pressure to change.

5. Sports gambling and problem gambling, some context

- 5.1. Strong independent evidence about the prevalence of problem gambling among sports bettors and their associated profiles is relatively thin in terms of total numbers of problem gamblers captured. Such studies, given how fast the sector is moving, also suffer from becoming dated relatively quickly.
- 5.2. Epidemiological studies do consistently show a strong weighting towards men under 34 in terms of sports gamblers generally, and both problem and at risk sports gamblers.²³ However, the percentage of gamblers who engage in sports betting is comparatively low, typically well under 10 per cent, with figures closer to 5 per cent being more usual.
- 5.3. Interestingly the recent Queensland prevalence study showed the percentage of those engaged in sports gambling had remained stable since 2006.²⁴ If this is correct, and yet expenditure is rising quickly, it is logical to suggest that those gambling in the area must be gambling considerably more.
- 5.4. Risk factors
 - 5.4.1. All studies, despite being taken at different times, tend to show that those engaged in sports betting do not come from what are typically regarded as vulnerable groups. They are likely to be employed and have average or better levels of income and education.
 - 5.4.2. However, against these protective attributes the studies also show that higher risk groups (identified through screening) are more likely to be involved in sports betting than those not at risk. Moreover, it should also be noted that that problem gamblers and those at risk were also more likely to engage in more types of betting. Sports betting, appearing as an additional opportunity to gamble, might be expected to provide an attraction for those already at risk or engaged in harm.

²³ The following three studies were consulted for this section: A study of gambling in Victoria 2009, Social and Economic Impact Study into Gambling in Tasmania 2008, Queensland Household Gambling Survey 2012.

²⁴ Queensland Household Gambling Survey 2012 p.26

6. Data and Feedback from services

- 6.1. The Foundation here gives some indicative figures from its own data taken from Gamblers Help services. Based on the Foundation's experience in the funding of Problem Gambling treatment services the following observations are offered:
 - 6.1.1. Of problem gambling clients who presented to face-to-face counselling services, and who provided details of their gambling behaviour, 4% report sports betting as a significant issue related to their problem gambling
 - 6.1.2. Over the past four years, Gambler's Help services report a fourfold increase in the number of problem gamblers who cite sports betting as an issue for them.
- 6.2. With regard to the importance of raising awareness, and providing protective public health advertising to correct the effects of gambling advertising, services have reported a strong spike in inquiries whenever the Foundation has run advertising campaigns designed to raise awareness around online sports betting.
 - 6.2.1. The specific social marketing campaign around sports betting developed in Victoria, *Easy to bet. Too easy to lose*, has now run twice.²⁵ Details of its great success in its first season were previously provided by the Foundation to the Committee for its Third Inquiry. The campaign was aired again in conjunction with the London Olympics in 2012. During the 66 days of the campaign, new visits to Gamblers' Help online rose by 92 per cent to more than 132,000 people. Return visits were made by 22 per cent of these people. The campaign also impacted on face to face counselling numbers, creating a 25 per cent increase while the campaign was running.
 - 6.2.2. This successful campaign has now been adapted and adopted by the Tasmanian government's Department of Health and Human Services.
- 6.3. In addition to examining its data the Foundation also consulted with Gamblers' Help services and asked practitioners for their observations around their clients and sports betting. The feedback received by the Foundation from the community sector did closely align with findings from the research and services data but also offered some fresh perspectives. Below is a compendium of their observations:
 - 6.3.1. Young men were identified as those most at risk and one service reported that clients with sports betting problems were becoming younger (18 to late 20s)
 - 6.3.2. Mobile devices appeared to be the main media for gambling, one additional comment noted that this meant the mobile phone itself acted as a continual prompt/temptation to gamble. Others noted newspapers and TV with their promotional material could have similar prompting effects.
 - 6.3.3. Some noted that sports bettors were likely to bet on a variety of types of gambling and preferred to do so using online media. Against this, others reported that their clients were normally loyal to one form of gambling

²⁵ The television advertisement can be seen at <http://www.youtube.com/watch?v=N-4M3qOEelo>

- 6.3.4. Belief that skill and knowledge of the sport will lead to success is a not uncommon, and incorrect, perception by those who have got into trouble
- 6.3.5. Access to sports betting is compounded by there always being something somewhere to bet on the world, the access is continuous
- 6.3.6. Advertisements can create anxiety in problem gamblers stemming from their guilt and fear the ads may raise questions from those around them, for example partners. Advertisements can also create distress in those who have been harmed by others' problem gambling
- 6.3.7. One pathway into sports betting and then problems, was identified as sports betting beginning as a peer activity, after school or perhaps sports practice, or as a group watching sporting events
- 6.3.8. Among teenagers, sports are now functioning as an associative link with gambling, whereas previously avenues such as pokies had less appeal.
- 6.3.9. Many young men were reluctant to seek help and less likely to feel financially pressured to do so, since they still lived at home.

7. Concluding remarks

- 7.1. The Victorian Responsible Gambling Foundation is of the view that all members of the community, including governments, sporting associations and authorities like ours, can play a role in creating a responsible gambling environment in relation to all forms of gambling. For the Foundation, this means providing tools, help and support for those in trouble and raising awareness in the community of the risks gambling can afford. This needs to be done in a sober manner that is based in evidence.
- 7.2. The Foundation strongly believes in the importance of social marketing campaigns that raise awareness of the risks associated with sports betting, push back against overly normalising industry advertising, and point those experiencing issues with their gambling toward help. The Foundation would suggest that more campaigns from government bodies in other states, and co-operation nationally on such projects, would be one productive response to the concerns raised by the public, researchers and practitioners in relation to sports betting.
- 7.3. With regard to sports gambling and sports gambling advertising, the Foundation also believes the industry and sporting associations have an important role to play in implementing a duty of care towards those vulnerable to the problems this form of gambling creates. This could include, for example, collaboration with those seeking to minimise harm via the adoption of responsible codes of advertising and marketing for industry, and codes and statements of principles from sporting associations. Importantly, the Foundation believes that exercising such care can be done by these organisations in balance with their other interests.

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