

Committee Secretary
Joint Select Committee on Gambling Reform
PO Box 6100
Parliament House
Canberra ACT 2600
Australia

Level 11, 257 Collins Street
Melbourne VIC 3000
PO Box 38
Flinders Lane VIC 8009
T: (03) 8662 3300
F: (03) 9663 6177
www.psychology.org.au

4 March 2013

To whom it may concern,

RE: Inquiry into the advertising and promotion of gambling services in sport

The Australian Psychological Society (APS) welcomes the opportunity to make a submission into the Senate Inquiry into the advertising and promotion of gambling services in sport.

The APS is the premier professional association for psychologists in Australia, representing more than 20,000 members. Psychology is a discipline that systematically addresses the many facets of human experience and functioning at individual, family and societal levels. Psychology covers many highly specialised areas, but all psychologists share foundational training in human development and the constructs of healthy functioning.

Our submission is based on our Review Paper [*The Psychology of Gambling*](#) and Position Statement [*Gambling-related Harm: A Position Statement prepared for the Australian Psychological Society*](#). These papers draw on the available evidence to provide recommendations for public policy and psychological practice with the aim of enhancing individual and community-wide mental health and wellbeing and reducing gambling-related harm. The current submission has been prepared with input from the lead authors of those papers, and from the National Executive of the APS College of Sport and Exercise Psychologists.

The APS supports the Australian Government's broader efforts to reduce gambling related harm and specifically endorses the current inquiry into gambling within sport. This is an important step in promoting the health and wellbeing of the community (particularly young people and those directly participating in sport) and in recognition of the wider community benefits of sport, to maintain the integrity of sport in society.

We are not in a position to respond to all of the terms of reference, but we do wish to comment on the likely impacts of exposure to gambling advertising within sport (a, b, c, e), the impact on children and young people (d) and the effect on the integrity of, and public attitudes to, sport (f), as discussed below.

Gambling advertising in sport

The APS is concerned about the noticeable increase in the advertising of gambling opportunities within sport, including within games, into commentary and coverage of games and alongside the promotion of sports events. Gambling sponsorship of sport has grown substantially, and sports betting turnover is growing rapidly.

Recent research, for example, has found that supporters at a sporting game were exposed to an average of 341 minutes of gambling advertising when simultaneous promotions were counted separately. A diverse range of marketing techniques were used to: a) embed sports betting within the game; b) align sports betting with fans' overall experience of the game; and c) encourage individuals to bet live during the game. There were very few visible or audible messages (such as responsible gambling or Gambler's Help messages) to counter-frame the overwhelmingly positive messages that individuals received about sports betting during the match (Thomas et al, 2012).

Gambling advertising and promotion is now integrated into sports reporting in many media; with the non-traditional promotion of wagering and the increasing use of mobile phone applications for wagering exposure to advertising, opportunities to gamble are made more accessible and immediate for a wider group of people. While sports gambling may be still a relatively small part of the gambling industry, it is growing faster than other forms and potentially impacts significantly on a younger and more vulnerable group of people, given mobile phone saturation amongst this group.

The impact of gambling and gambling advertising, particularly on young people

This proliferation of gambling advertising within sport has the effect of normalising it, making it an integral component of sporting activities and an accepted part of participating in and enjoying sports, and particularly influencing the attitudes of children and young people (Gainsbury & Blaszczynski, 2011a). Betting odds, for example, have made their way into how people (young people particularly) discuss and experience sport, and the use of mobile phone technology as well as the social aspect of sports betting are both likely to have contributed to this normalization and to the rapid uptake of this form of gambling.

Increased availability of gambling opportunities typically results in a simultaneous increase in gambling behaviour and problem gambling (Productivity Commission, 2010). Constant availability of gambling from any location, accompanied by increases in advertising may normalise this activity, resulting in increased participation and less perception of potential harm, particularly of concern for adolescents, who are highly influenced by advertising (Monaghan, Derevensky, & Sklar, 2009).

While the impacts of such increases in the availability and promotion of sports betting have not yet been widely researched, gambling research generally shows that an increase in exposure to gambling advertising and opportunities is a risk factor for the development of gambling problems, particularly among vulnerable groups in the community.

In particular, the APS has serious concerns about the impact on children and young people who are regular participants and viewers of sports that involve exposure to gambling advertising. Young people are particularly at risk of harm due to:

- already being more susceptible to gambling advertising (Lamont, Hing & Gainsbury, 2011) and vulnerable to gambling, with research showing that a substantial proportion of secondary students indicate that they gamble online (Delfabbro et al, 2005);
- their familiarity with and widespread use of emerging technology (particularly mobile phones) in all aspects of their lives;
- fewer checks for age appropriateness in forms of sport gambling (apart from the use of a credit card), and the likelihood it can be engaged in in isolation from others (such as parents or other adults);
- the use of young people's sporting 'heroes' by sporting organisations to promote gambling opportunities; and
- young people growing up with sports betting as an integral and 'normal' part of their experience of sport, particularly those sports that are popular among young people (such as AFL football). This includes the likelihood that young people have witnessed their parents and other adults wagering, so are more likely to see it as a socially acceptable activity.

The impact of gambling and gambling advertising on athletes

We are also concerned about the harm posed by gambling advertising and sports gambling on athletes themselves and other key stakeholders within sporting clubs/professions. For some elite sports people, their high profiles, lucrative contracts and celebrity treatment can make them even more vulnerable than the general population.

Practice-based evidence from sport and exercise psychologists confirm that gambling has become more of a regular issue impacting on athletes in professional sport and increasingly now in Olympic sports. Peer pressure is one of the biggest contributors to the impact on athletes, and stems in turn from advertising and the consequent normalisation of sports betting. Less understood are the financial losses (not gains), loss of time, eventual anti-social nature of excessive gambling, and the athlete's vulnerability to involvement in match fixing, just to name a few. Athletes are also more vulnerable than the general public to problem gambling as they are directly targeted by the gambling industry. Examples cited by members of the APS College of Sport and Exercise Psychologists include athletes being offered all-expenses paid first class overseas trips as an incentive to gamble online during that week, invitations to join international gamblers at casinos (where athletes are provided with money and taught how to play), and via social media, where organised crime can follow athletes to ascertain information about injuries. Our members report that some of these athletes have been found to be contributing to match fixing as a consequence of being groomed in these ways.

With the proliferation of gambling advertising, athletes are particularly vulnerable to exposure and incentives not only to gamble themselves but also to participate in illegal gambling profiteering schemes such as match-fixing and race-fixing. Match-fixing has become a pandemic in world sports, from athletics and horse racing to cricket and all football codes. It is fuelled by real-time betting technologies

exploiting the culture of normalised gambling. By contributing to this “normalisation”, gambling advertising plays into the hands of crime syndicates who remain undeterred by Interpol arrest warrants, with estimated €8 million of betting profits generated by match-fixing in Germany alone and at least €2 million paid in bribes to those involved (Europol data: <https://www.europol.europa.eu/content/results-largest-football-match-fixing-investigation-europe>). With such incentives, athletes, who are typically young people themselves, may find the lure hard to resist – over and above the intense pressures that can lead to their own problematic gambling behaviours.

The effect on integrity of sport

Given the popularity and influence that sport and sporting culture have on the broader community, the APS believes that this rapid proliferation of gambling and its promotion within sport risks seriously affecting the legitimacy of ‘the game’. Industry sponsorship of sport is undertaken to encourage people to gamble and as a way of legitimising their product, not as an altruistic activity. Apart from the risks it poses to vulnerable groups (as discussed above) of problematic gambling behaviours (and the concomitant intrapsychic, interpersonal, economic, and social consequences), the integrity of sport is seriously threatened, with public confidence diminished and supporter enjoyment undermined.

Points for consideration

As discussed above, while gambling advertising in sporting contexts is aimed at and therefore certain to impact on a growing number of Australians, including athletes themselves, the exact nature, extent and harm caused by this form of gambling and its widespread promotion remains largely unknown. The APS considers that the increasing integration of gambling advertising (including in online mediums and of online gambling itself) in sporting events and activities has the potential to normalise gambling and influence the attitudes of children and young people towards gambling in the future.

The APS therefore hopes that the outcomes of this Inquiry will include consideration of the following steps:

- Children and young people are protected from exposure to gambling advertising and gambling-related harm as a matter of urgency. Young people should be the focus of targeted prevention programs, and consideration should be given to regulating the burgeoning advertising of gambling so that it does not deliberately target this vulnerable group. This could include banning gambling incentives and gambling-related marketing aimed at children, young people and families, banning gambling sponsorship of junior sport, incorporating harm minimisation messages through sport, and the promotion of healthy sporting participation.
- Gambling advertising during sporting matches and related broadcasting should be seriously restricted if not banned, with restrictions similar to those imposed on alcohol and smoking advertising introduced to protect vulnerable groups from exposure to gambling inducements, to dis-associate sport from gambling, and to restore the integrity of sporting codes.

- A range of measures are developed to target athletes and sports people specifically at primary prevention, early intervention and response levels. Such measures could start with the acknowledgement that the best prevention and 'treatment' is to keep athletes engaged in their sports, and to use the positive peer pressure and motivation of their sport involvement to preempt problems or to promote behaviour change as needed.
- Supporting athletes who may be engaged in problematic gambling includes ensuring that those seeking help in relation to any problems with their gambling are not deterred from doing so, for example by any mandatory reporting requirement on the part of health professionals. Harm minimisation strategies are to be preferred ahead of criminalisation.
- Research and development needs to be promoted into the potential for internet and mobile phone applications to be used to deliver responsible gambling messages, gambling treatment and self-help interventions.
- Public education and treatment programs be expanded and accessible to assist those who are problematic gamblers, especially young people. This includes promotion of responsible gambling and harm minimisation messages in all forms of sport games and media.
- Further research is undertaken to understand the impact of gambling advertising on children and young people, as well as on problem gambling, to enable informed policy and regulation of gambling advertising.
- Consumers, including athletes, sporting clubs, young people and sports fans, are involved in the development of policies designed to reduce gambling-related harm, and in the evaluation and review of interventions to prevent and minimise gambling harm. Input from athletes and other consumers with direct experience of sport-related gambling harm would be especially valuable.

The APS has no interests or affiliations relating to the subject of the consultation and the representations submitted, other than our concern that the Australian Government be well-informed and effective in its strategies.

As discussed, we would be happy to appear as a witness and/or provide further comment on this Bill in person should you require it or for further information about our submission please contact me on 03 8662 3327.

Yours sincerely,

Heather Gridley FAPS
 Manager, Public Interest
 Australian Psychological Society

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