

Victorian Responsible Gambling Foundation submission to Commercial Radio Australia in relation to, *Review of the provisions relating to the broadcast of gambling and betting odds in live sport in the Commercial radio code of practice*

Submitted 15 December 2017

Executive summary

The Foundation welcomes the opportunity to provide feedback on the proposed code revision by Commercial Radio Australia.

The Foundation notes the intention of the Commonwealth government's reform of advertising and the promotion of gambling during live sport. This being, to create a clear and practical safe zone where parents can be confident children can watch or listen to live sport without experiencing messages that normalise gambling.¹

The Foundation supports this reform as a step in reducing the normalising effects of advertising and promotion of gambling on sport in all forms of media. The Foundation further notes the mounting body of evidence of gambling advertising's normalising effects on children. This includes, giving them recognition and positive identification with gambling brands, understanding of odds, of ways to bet, perceptions that gambling is relatively free of risk, and prompting the formation of intentions to bet.

The Foundation notes the Victorian government's position on gambling advertising, which sees further restrictions on gambling promotions and advertising as necessary. In particular, that any live sport that begins before the relevant 8.30pm restrictive zone should continue to be free from gambling advertising and promotions until 5 minutes after it finishes.² This would allow children to watch the match to its conclusion in the same safe zone they began watching in.

The Foundation is concerned that some of the proposed changes to the code by Commercial Radio Australia are not in accord with the government's intention nor the community sentiment or research evidence that informed that intent. In particular, we are concerned with a number of the exemptions and exceptions being proposed from the restrictions, occurring in a paper ostensibly about introducing these restrictions.

Foundation recommendations

The Foundation first recommends against exemptions being proposed on the basis of time zones and in relation to forms of sport.

The Foundation does not accept the position put by Commercial Radio Australia that, where there is a

¹ <https://www.communications.gov.au/what-we-do/television/broadcast-and-content-reform-package>

² The Hon Marlene Kairouz, Media Release, [Gambling Ad Ban Near Schools, Roads and Public Transport](#), 17 September 2017

broadcast across simultaneous time zones, the restrictions of no gambling ads or promotions between 5am to 8.30pm should only apply in relation to Australian Eastern Standard Time, or Australian Eastern Daylight Saving Time, or the time zone with the largest proportion of the population .

1. The code should state that, any children listening will be guaranteed, because they are listening within *their* time zone of between 5am and 8.30pm, that they will hear no gambling promotions or advertising.

Commercial Radio Australia's proposal, by contrast, undermines the purpose of the restrictions and denies their importance. In effect, Commercial Radio Australia is proposing that only *some* Australian children should be protected by the 8.30pm restriction. In effect, some children will have more protection than others, and by implication some children are therefore less important than others.

Yet, the purpose of the Australian government's policy cannot be but to treat all children as equally valuable and to provide for all of them the safe zone it has determined upon. Commercial radio's proposed exemption flies in the face of this.

2. The Foundation recommends that if the licensees cannot deliver this broadcast policy equitably to all Australians at the appointed times, then the restrictions must be widened to be adequate to protecting all children. Thus the restrictions should be from 5am AEST (or AEDST) to 8.30pm Western Australian Standard Time (WAST).

The Foundation also does not accept the reasoning in Commercial Radio Australia's paper that suggests that long forms of sport are different and should not be treated as 'siren to siren' sports are.

The intentions of the Commonwealth government are clear and the rules of the code should be too. That is, when live sport is being broadcast, parents will be able to be confident that children will not be exposed to gambling advertising and promotions.

Thus, a day broadcasting test cricket or the Australian open is a live sport event until there is a substantial break that has programming unrelated to the live sport. This is a common sense view that constitutes a reasonable expectation of what the government policy will provide.

3. At all times, the live sport broadcast of any sport should abide by the restrictions relating to no advertising before, after or during the broadcast, between 5am and 8.30pm. This will be a clear and practical measure supporting the provision of a safe zone for children to listen to sport without it being linked to gambling.
4. The Foundation further recommends, that the code be comprehensive in its definition, covering off all forms of gambling promotions and advertising, including sponsorships, brand promotions and merchandising. Comprehensiveness is needed, because the evidence is strong, that in the gambling advertising rich environment children inhabit, inside and outside of live sport, brand mentions alone are recognised and linked in the minds of listeners to the

larger messages about gambling children receive.³

5. With regard to sports tipping and fantasy competitions, the Foundation recommends distinguishing between those promoted by bookmakers (acting as a form of marketing and often with large cash prizes) and more innocuous games presented purely for entertainment value and in no way associated with gambling or the gambling industry. The proposed code currently does not do this but it should.

The Foundation also notes, at 9.14 of the Commercial Radio Australia explanatory note, a statement that mentions an 'alternative service' being exempt from the restrictions. If by this, the intention is to exclude streaming services from the restrictions, the Foundation finds this unacceptable. Streaming of a live broadcast is effectively a broadcast, particularly from the point of view of children. Levels of internet penetration are now such that streamed services are becoming ubiquitous and just another option alongside analogue and digital broadcast services.⁴ Therefore, discrimination between mediums is not appropriate from the point of view of consumer protections. The Foundation further notes, the Commonwealth government explicitly announced the restrictions would cover online platforms.⁵

6. Thus, all forms of broadcast, regardless of the channel should comply with the restrictions.
7. The Foundation also recommends the restrictions should apply not from five minutes before the first whistle or shot, as Commercial radio proposes, but from the time the players enter the field of play.⁶ The restrictions should also apply for five minutes after all the players have the playing area. This is far more realistically in accord with when children will start and stop listening to the event as a live event.
8. Finally, the Foundation recommends against the exception to allow continuation of commercials within the restricted time zone if there was a contract in place before March 2018.

³ See Parliament of the Commonwealth of Australia, 2017, [Communications Legislation Amendment \(Online content and Services and other Measures\) Bill](#) (includes Regulatory Impact Statement) pp.7-9 and the section, Evidence supporting reform, below.

⁴ Australian Bureau of Statistics, [Internet Activity, Australia](#) June 2017, noted there were now in excess of 7 million broadband subscribers and an additional 6.1 million mobile internet subscribers. The ABS report, [Household Use Of Information Technology 2014-15](#) noted 86% of households had an internet connection, and in those with children under 15 the figure was 97%. The [Digital Australia Report](#) 2018 found 60% of households had more than 5 screens. Deloitte's [Media Consumer Survey](#), 2016, found that streamed programming continues to grow, that those aged 14-26 had the internet as their first source of entertainment and that 90 per cent of this group had smart phones. Also see, See Parliament of the Commonwealth of Australia, 2017, [Communications Legislation Amendment \(Online content and Services and other Measures\) Bill](#) (includes Regulatory Impact Statement) pp.11-12

⁵ Department of Communications and the Arts, [Fact Sheet: Broadcasting – moving to more efficient broadcasting fees \(PDF, 422KB\)](#) October 2017

⁶ This would be with proceeding to beginning the match or contest, eg. not returning to the rooms after a preliminary warm up.

While it may not be intended this way, this clause is open to abuse and could undermine the effect of government policy. Since the government announced its policy in May 2017, it would seem practical that only contracts signed before then would be eligible for an exception.

9. Further, all existing contracts should still have a sunset aspect, certainly by October 2018 at the conclusion of the main football seasons. If the industry cannot regulate this itself, we would recommend the government take action.

Overall, the government's intention could not be more clear, no gambling advertising or promotions during live sport between 5am and 8.30pm. This should be enacted in a blanket manner in order to provide a safe zone where all Australian children can watch and listen to live sport without gambling advertising and promotions intruding. The intention is to make this time period a safe zone, where all Australian parents can be confident children will not be exposed to messages that give them the impression that gambling is a part of participation in following sport.

The revised code should state and make good this intention clearly in its rules. In the current version it falls well short.

About the Foundation

The [Victorian Responsible Gambling Foundation](#) is a statutory authority established in 2012 with the bipartisan support of the Victorian Parliament.

Taking a public health approach, the Foundation strives to meet its mandate by acting across four key areas:

- 1) increasing community awareness about the risks of gambling and the help available, through public campaigns and community education
- 2) providing information and advice to the community on the Victorian gambling environment to promote discussion and participation in decisions about gambling
- 3) conducting research to better understand the impact and address the negative consequences of gambling in our communities.
- 4) providing effective and accessible Gambler's Help counselling services

The foundation is firmly focused on identifying, understanding and ameliorating the impact of gambling harm.

Introduction

The Foundation welcomes the opportunity to provide feedback on the proposed code revision for Commercial radio, intended to accommodate the Commonwealth government's policy of banning gambling advertising and promotions between 5am and 8.30pm for five minutes before or after live sport.

The government's policy is based on evidence and the widespread community concern that constant gambling advertising is forming views among children that gambling is a normal part of participating

in watching or listening to sport.⁷ The government has stated that the policy is being made to provide children with a 'clear and practical safe zone' where they can follow sport.⁸

The Foundation shares the government's concerns regarding the normalisation of gambling in relation to sport, particularly in relation to the way gambling advertising and promotions are encouraging children to view sport. This normalisation is occurring at ages where children, especially of primary school age, have limited comprehension and reference points.⁹ Further, in the case of all sports except horse and dog racing, it runs counter to traditional Australian engagement with sports.

Traditionally, Australians have engaged as fans of sport, supporting teams or players and appreciating the skills and efforts of those playing. In relation to children, Australia has a strong culture of using sport to model behaviours and teach lessons about effort, co-operation, and fair play. In contrast, gambling on sport prioritises seeing it as a series of opportunities to make bets that will have outcomes of win or loss for the individual making the bets. This is a very different framing of the values and perceptions of what it means to watch sport.

The Foundation in its own prevention program, '[love the game](#)', emphasises the former values and works with sporting organisations to continue those values and shield children from exposure to promotions of a culture of gambling on sport.

The Foundation views the introduction of a ban on advertising and promotions during live sport as an important step in protecting children from the socialisation effects of widespread promotions and advertising of gambling that saturate all the media environment. A socialisation that changes the meaning of sport and encourages false ideas about both the normality of gambling and the risks associated with gambling.

The Foundation notes the policy position held by the Victorian state government that, the restrictions would work better and provide more safety, if any match that began before 8.30pm was required to be free from gambling advertising and promotions until its conclusion.¹⁰ This would allow children to watch or listen to games to their conclusion. It is a practical reality that many children, particularly adolescents, will stay awake to the end of a game. It is logical that, if the purpose of the

⁷ See for example, Thomas SL, Randle M, Bestman A, Pitt H, Bowe SJ, Cowlshaw S. 2017, 'Public attitudes towards gambling product harm and harm reduction strategies: An online study of 16-88 year olds in Victoria, Australia'. *Harm Reduction Journal*. (49):1-11; Sproston, K. Hanley, C. Brook, K. Hing, N. and Gainsbury, S. 2015, [Marketing of sports betting and racing](#). Gambling Research Australia. p145ff. See also, Parliament of the Commonwealth of Australia, 2017, [Communications Legislation Amendment \(Online content and Services and other Measures\) Bill](#), Regulatory Impact Statement, pp.7-9

⁸ Department of Communications and the Arts, [Fact Sheet: Broadcasting – moving to more efficient broadcasting fees \(PDF, 422KB\)](#) October 2017; Dept of Communications and the Arts Broadcast and Content Reform package at <https://www.communications.gov.au/what-we-do/television/broadcast-and-content-reform-package>; Media release, Senator the Hon Mitch Fifield, [Major Reforms to Support Australian Broadcasters](#) 6 May 2017

⁹ For discussion see, Jeffrey E. Brand, *Television Advertising to Children: A review of contemporary research on the influence of television advertising directed to children*, ACMA, May 2007

¹⁰ The Hon Marlene Kairouz, Media Release, [Gambling Ad Ban Near Schools, Roads and Public Transport](#), 17 September 2017

policy is to provide parents with the assurance their children can watch or listen to live sports free from exposure to gambling, applying the restrictions to the entirety of matches that begin before 8.30pm will provide a better outcome.

Evidence supporting reform

The Foundation notes that there is strong evidence that children as young as eight are absorbing in a positive manner messages from gambling advertising, including recognition of brands and perceptions that gambling can be risk free because you will be offered your money back. Older children, in late primary school and early high school, are also absorbing notions of how to bet and what to bet on. The applicability and importance of odds is also becoming part of children's views of how one should see sport.¹¹

Standard Media Index reports that, Australia wide the gambling industry spent \$234 million on all advertising in 2016. This expenditure has been steadily increasing throughout the decade, it is up from around \$90 million in 2011¹². Gambling advertising is highly prevalent in broadcast media. Further, it is not surprising that the effects of advertising are strong on those children who follow sport, since live sport and programs about sport are where the advertising is concentrated.¹³ Moreover, adolescents may have higher exposure to gambling advertising than adults.¹⁴

This mass advertising of sport is a relatively new phenomenon, so definitive evidence of the impact this advertising on children will have on their adult gambling is not yet available. However, research has found that many young adult gamblers do now regard gambling as major part of how they are watching and regarding sport.¹⁵

Moreover, betting on sports is the form of gambling that is growing fast in Victoria and elsewhere.¹⁶

¹¹ Hannah Pitt, Samantha L. Thomas, Amy Bestman, Mike Daube, Jeffrey Derevensky, 2017 What do children observe and learn from televised sports betting advertisements? A qualitative study among Australian children, *Australian and New Zealand Journal of Public Health* [online](#); Pitt H, Thomas SL, Bestman A, Stoneham M, Daube, M. 2016, "It's just everywhere!" Children and parents discuss the marketing of sports wagering in Australia. *Australia and NZ Journal of Public Health* 40(5):480-6; Thomas S, Pitt H, Bestman A, Randle M, Stoneham, M, Daube M. 2016, [Child and Parent Recall of Gambling Sponsorship In Australia](#). Melbourne: Victorian Responsible Gambling Foundation; Hing N, Vitartas P, Lamont M, Fink E. 2014, 'Adolescent exposure to gambling promotions during televised sport: An exploratory study of links with gambling intentions'. *International Gambling Studies*. 14(3):374-93; Derevensky J, Sklar A, Gupta R, Messerlian C. 2010, 'An empirical study examining the impact of gambling advertisements on adolescent gambling attitudes and behaviors'. *International Journal of Mental Health and Addiction*. 8(1):21-34.

¹² Figures from Standard Media Index. Note, they do not include sporting sponsorships or program branded content

¹³ Pitt 2017

¹⁴ Sproston 2015 pp143-7;

¹⁵ Deans EG, Thomas SL, Daube M, Derevensky J. 2017, 'The influence of marketing on the sports betting attitudes and consumption behaviours of young men: implications for harm reduction and prevention strategies' *Harm Reduction Journal* 14:5; Deans EG, Thomas SL, Daube M, Derevensky J. 2016, 'The role of peer influences on the normalisation of sports wagering: A qualitative study of Australian men'. *Addiction Research and Theory*. 2016;25(2):103-13

¹⁶ [Australian Gambling Statistics](#) 33rd edition, Hare S. 2015, [Study of Gambling and Health in Victoria](#), Victorian Responsible Gambling Foundation 15/12/17

In terms of experience of harm from gambling on sports, Foundation analysis of Victorian prevalence findings indicates that around 37 per cent of those gambling on sport experience some form of harm.

On the proposed code changes by Commercial Radio Australia

Objections to proposed exemptions – alternate recommendations

Time zones

The Foundation is dismayed to see the proposed code is not in accord with the stated intention of the government in banning advertising and promotions of gambling within five minutes of play starting and five minutes of ending between the hours of 5am and 8.30pm.

Instead the proposed code contains exemptions to this clearly stated intention. In particular,

9.17 Subject to sections 9.18 and 9.19, where a Live Sporting Event takes place outside the Licensee's licence area, the 5.00am to 8.30pm time zone should be determined by reference to the time zone of the Licensee's licence area.

9.18 Where a Live Sporting Event is broadcast simultaneously across more than one licence area, a Commercial relating to Betting or Gambling or the Promotion of Odds may be broadcast if it is permitted in accordance with this section 9 for AEST or AEDT as applicable.

9.19 Where a Licensee's licence area covers areas in which different time-zones are observed, the time-zone for the part of the licence area that contains the largest proportion of the population will apply.¹⁷

There is no reason offered for this exemption. Its effect is to undermine and negate the intent and spirit of the government's policy and reject the community sentiment that supports it. Under this exemption, the 'safe zone' for children shall exist in its entirety only for some children. The exemption is actually claiming a right to discriminate.

The government, acting on evidence and in accord with community demands, has declared a ban during these time periods as policy for the public good of children. It has not said for "some children". The effect of the proposed exemption is to say that the 8.30pm cut-off is effectively flexible. It does not matter if some children are being exposed to gambling advertising from 8pm (SA), 7.30pm (Qld in summer) or as early as 5.30pm (WA in summer).

The Foundation would note that, on the basis of evidence the 8.30pm cut off is conservative. Many children will still be following sport past this time, especially on weekends. The Foundation has previously indicated that if advertising were to take place at the starting time would be 9.00pm. This is when there would be a much higher likelihood that parents were watching with children and were in a position to provide critical commentary to accompany the promotions or mute them out in some

way.¹⁸

The Victorian government's position is that the restrictions do not go far enough. The Minister has expressed the recommendation that once a live sporting event has begun, within the times of 5am to 8.30pm, it should remain free from gambling promotions until it concludes.¹⁹

For the Commercial Radio code to move the time back to potentially as early as 5.30pm to suit their own purposes is not acceptable. If national or multi-zone broadcasters lack the ability to properly provide for matters related to their licence in accord with the needs of particular parts of Australia, they should adjust the implementation of the restrictions so that all children benefit from the government policy.

The Foundation therefore recommends that, if the restrictions cannot apply equally to all time-zones children are listening in, then the restriction needs to apply from 5am EST or EDST to 8.30pm WAST.

Long form sports

The Commercial Radio Australia paper asserts that in long form sports different rules should apply. Long form sports are identified as golf, tennis, car races, cricket, the Olympic or Commonwealth games.

The proposed code would permit gambling advertising "during play as part of a distinct break", provided that there is no promotion of odds for an event that has already begun.

Depending on what is meant as a distinct break, this exemption potentially undermines the intent of the government to provide a practical and clear safe zone where children can listen to live sport free from gambling promotions or advertising.

Distinctions between long form or other forms of sport have little relevance to children or parents. Their reasonable expectation will be that, while a live sporting event is being broadcast, gambling advertising will not be present. Indeed, from the point of view of the consumer, the event is live for as long as it is taking place and people on the radio are talking about it. This would include not just descriptions of what is happening but crosses to other parts of the same event or linking commentary relating to past or future actions within the event.

In general, and in accord with the government's expressed policy wish of a creating a safe and practical zone where families can watch live sport, the nature of the sport should offer no exemption to the general ban. Clear and practical policy for Australian parents and their children means that parents can be confident that, at any time between 5am and 8.30pm, when their children are watching or listening to live sport, they can be assured the children will not be subjected to promotions and messages about gambling.

The Foundation therefore recommends that the code should guarantee what the government means

¹⁸ Victorian Responsible Gambling Foundation, 2015, [Submission to the Review of the Impact of Illegal Offshore Wagering](#) pp.8-9

¹⁹ The Hon Marlene Kairouz, Media Release, [Gambling Ad Ban Near Schools, Roads and Public Transport](#), 17 September 2017

by a clear and practical safe zone. That is, it will be clear that there will be no gambling advertising or promotions of gambling during periods where live sport is being broadcast. In the case of long form this includes the duration of the day or night's play (inside the restriction to 8.30pm).

Being practical, a day or day/night of cricket, or the Australian open day session, is all live play from the point of view of children and parents. A long break of 15 - 30 minutes or more before the night session begins, where for example a program unrelated to the sport, eg. the news, is on, would count as a real break where the restriction need not apply. However, a lunch or tea break in the cricket, featuring highlights from the match and commentary about the match, is still experienced as part of the live broadcast. It would run counter to the spirit and intent of the policy if, during this break, the broadcaster ran gambling commercials, promotions, brand placements and so forth.

Restrictions on gambling advertising should be comprehensive

The Foundation notes that the Commonwealth government has set out its intent to curtail gambling advertising and promotions via a restriction on them before, after and during live sport between 5am and 8.30pm.

The Foundation recommends the code makes it clear that the restriction is comprehensive. That it covers all forms of gambling advertising and promotions including:

- 1) Commercials
- 2) Sponsorships and any form of brand representations and references
- 3) Any advertisements that are linked or reference brands or brand storylines
- 4) References to odds or companies in the commentary
- 5) Appearances by figures identified as celebrities linked to brands or wearing brand sponsored clothing while uniquely appearing as guests on the licensees broadcast. An exception would be made for crosses to live to ground interviews where the team uniform may contain branding
- 6) Other products, such as fantasy competitions, that are sponsored by or include gambling company brands and logos.

The proposed code makes an exception for sponsorships, however the research evidence makes it clear that even primary school age children are quite capable of making connections between brand names and sporting teams and players.²⁰ This aspect of branding is a standard part of advertising campaigns. The campaigns work to transfer emotional support of the team or player to the brand and gambling activity. The sponsorship cannot be divorced from the broader campaigns and messages that saturate the media, not just during live sport but also throughout other programming.

²⁰ Hannah Pitt, Samantha L. Thomas, Amy Bestman, Mike Daube, Jeffrey Derevensky, 2017 What do children observe and learn from televised sports betting advertisements? A qualitative study among Australian children, *Australian and New Zealand Journal of Public Health* [online](#); Thomas S, Pitt H, Bestman A, Randle M, Stoneham, M, Daube M. 2016, *Child and Parent Recall of Gambling Sponsorship In Australia*. Melbourne: Victorian Responsible Gambling Foundation 15/12/17

In relation to children and gambling, such campaigns are normalising, socialising children with the idea that gambling on sport is part of sport. Countering this normalising process, allowing children to watch sport free from it, is the government's intention behind the restrictions. Thus, this proposed exception actively undermines the intent of the government's policy.

Fantasy sports and sports tipping competitions should not be conduits to gambling companies or culture

The Foundation would first note that there are tipping competitions being offered by sports betting companies that are offering up to \$100,000 in prizes. These do not necessarily fall into the category of being a "light hearted and fun element of commercial radio content".

Moreover, competitions that are run by licensed bookmakers propagate their brand and are clearly part of strategy to grow their market share. In addition they further encourage the belief that skill and knowledge can allow large winnings. In this sense, they are no more suitable for children than more overt advertising for gambling.

Likewise fantasy sports competitions conducted by bookmakers also are about branding and growing market share and should not be promoted during the restricted times.

The Foundation recommends that any fantasy sports or tipping competitions run by gambling companies that offer large prizes or promote gambling brands or links to gambling brands and sites should be included in the restrictions on gambling advertising.

When the five minutes starts?

The proposed code suggests the five minute restriction should begin from the first action of the game, eg. the blowing of the umpires whistle in Australian rules. The Foundation recommends as more practical, realistic and protective, that the restriction should be five minutes before the players enter the field of play. The appearance of the players is the most obvious point where the audience's attention begins, perhaps even more so for younger children since the players/teams are a major point of identification.

Streaming and online be covered in restrictions

The proposed code in section 9.14 of the explanatory note states that the restrictions do not apply where the exposure is,

"the result of an active choice to switch to an alternative service related to the broadcasting of the event (for example, by accessing a url or subscription service)"

The Foundation first notes that the government has signalled that it wants the restrictions to be comprehensive, including online platforms.²¹

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²¹ See Parliament of the Commonwealth of Australia, 2017, [Communications Legislation Amendment \(Online content and Services and other Measures\) Bill](#) (includes Regulatory Impact Statement) p.12

Second the term “active choice” is not appropriate in relation to children in this matter. The purpose of the policy is protect them in safe zone and that the safe zone encompass all the media they may be listening to the sport on. Children cannot be said to be able or expected to understand the implications of making active choices between mediums.

Finally, if by alternative service the note means streaming services, these are (a) effectively the same live broadcasts and (b) will certainly be so from the point of view of children, who as digital natives are as likely these days to be using a mobile device to listen to a sporting event as more traditional forms of analogue radio or even digital radio.

The Foundation therefore recommends that 9.14 be dropped and wording explicitly including streamed and online versions of the live broadcast also be included.

Contracts should not be ways to avoid the restrictions

The Foundation does not accept the exception proposed in Section 9.13 to allow continuation of gambling commercials due to contracts entered into prior to March 30 2018.

The exception is clearly open to abuse and could work to undermine the restrictions for a number of years.

The Foundation notes that the government announced its policy on 6 May 2017. It is entirely reasonable that any contracts entered into after this time would and should take this policy into account.

Even contracts before this time, should have some sunset aspects to them. The Foundation recommends that no contract should be allowed to persist that involves breaking the restrictions beyond October 2018. If the industry cannot manage this it would appear to be a failure of self-regulation. The Foundation would therefore recommend that the government step in to deliver its policy by regulation.

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