



White Ribbon Association®

Promoting healthy lifestyles

White Ribbon Association response to CAP and BCAP consultation on the age used for scheduling and targeting of the National Lottery advertising

The White Ribbon Association (WRA) is a charity dedicated to raising awareness of the harmful effects that drugs, alcohol, tobacco, and gambling have on individuals and society. Working with local communities in educational and community settings we aim to equip individuals with information on the effects of our chosen topics and provide them with resources to find help and advice.

Our work within gambling related harms include working with like-minded groups on local and national forums. We are members of the Gambling Health Alliance and Coalition against Gambling Ads.

We welcome the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) consultation on the age used for scheduling and targeting of the National Lottery advertising. The Government has recently placed further restrictions to the National Lottery in their move to protect young people from gambling harms by raising the age of participation from 16 to 18. Therefore, adverts for such products should reflect this essential change within the timeframe set by the Government and the gambling regulator (currently online purchasing: April 2021 and on-site purchasing: Oct 2021).

Proposed rules:

CAP 17.14

Marketing communications for lotteries should not be directed at those aged under 16 years (or 18 years for National Lottery products) through the selection of media or context in which they appear.

BCAP 32.4.1

[These products may not be advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to persons below the age of 16:]

Lotteries, except National Lottery products

32.2.8

[These may not be advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 18:]

National Lottery products

White Ribbon Association response to CAP and BCAP consultation on the age used for scheduling and targeting of National Lottery advertising. May 2021

Question: Do you agree with CAP and BCAP's proposed new rules to raise the age for targeting and scheduling National Lottery products ads to 18? Please set out your arguments for supporting or disagreeing with the proposal.

We support the proposal to raise the age for targeting and scheduling adverts for National Lottery products to 18 years. This needs to be done in order to support new Government legislation coming into effect in October 2021 that raises the age of participation of the National Lottery from 16 to 18 years old. We hope to see this change to be the first of many, towards the goal of ending all gambling advertising.

Young people need protection for gambling advertising even with the National Lottery in place. The National Lottery has evolved over its 25 years and now offers 'instant wins. The Young Peoples Gambling Survey 2020 showed there were children 16 years old and under playing the National Lottery highlighting the reasons why these young people gambled on it were:

- The chance of winning big (particularly raised in 11-13year olds).
- It is fun and simple to play.
- They enjoy scratching off the card to see if they have won (41% of 16 years olds raised this).
- 60% of 16 years olds stating they play because they can do legally.

Some people are buying a scratch card or lottery ticket for a 16 year old's birthday instead of putting money or vouchers in the card. This is seen as a rite of passage to such families.

Advertising of gambling has also evolved not only by increasing in volume but also being used across different medias, not just radio and TV. Advertising has been seen as a tool used to introduce children and teens to the principles of gambling occurring as a social context where gambling is viewed as an exciting harmless form of entertainment.ⁱ This is a growing concern as research has shown that adolescents perceive the central messages of gambling as fun, enjoyable, and part of a worry-free way of winning easy money. They perceive it as an entertaining lifestyle that does not require the real efforts needed for school or workⁱⁱ The young people and gambling 2019 survey highlighted that 69% of 11-16 year olds had seen or heard gambling adverts or sponsorship, with 11% receiving direct marketing from companies about gambling proves young people are being exposed to gambling.

Whilst we support the recommended ban on ads aimed at under 18's, we suggest the age to this ban be extended to 25 years old. We believe it would be impossible to make an advert appealing to 18 year olds that is not appealing to 16 year olds due to the small age gap. Another issue with 18-25 year olds is that they are usually leaving the parental home to start university, are beginning employment, or receiving benefits in their own name. All of these will give individuals an income with some being a large amount of money paid in one go (particularly seen in student loans payments). They also have become the legal age to gamble. Research highlights concerns surrounding the motivations this age group use as reason to gamble which include:

- Like how it is seen as taking risks

- They want to become a skilled player.
- They find it relaxing.ⁱⁱⁱ

Adverts should be aimed at 25 years old plus, and such a rule would back recommendations laid out within another code you have placed where it states that 'marketing of gambling (including lotteries) should not include anyone under 25's partaking in a gambling activity/product purchase'.

Development of social media platforms has brought a new indirect way to advertise products and the gambling industry have utilised this, legislation needs to reflect these changes and place regulations that protect both young people and vulnerable players. Within our Gambling Act review call for evidence response we called for regulations to be placed upon gambling advertising particularly within social media and using influencers in order to protect under 18's and we hope CAP and BCAP's codes support this.

We see the above stated recommended changes to the codes as a small step in protecting young people under the aged of 18 from gambling harms but more can be done.

Within the Gambling review response we also advocated for a Public Health approach to reduce gambling harms. Adverts need to consider the health implications of gambling harms and treat gambling as an addiction and not just a hobby. We stated that we would like to see change in legislation which places mandatory public health based harm reduction messages within all gambling advertising and on all gambling related products to bring this unhealthy public health behaviour in line with others (alcohol and tobacco). The words 'In it to Win it', Fun, etc... should be removed from adverts as they emphasise that gambling is the norm in society as we have already highlighted that these messages draw young people into the activity. Regulations that should be included is size of font, visible colours scheme, and standard placement sizes and for TV and online ads length of time message is shown within the ad (i.e. Not just a quick flash up on end frame). Information on the National Gambling Helpline should be included in all ads as standard practice.

The National Lottery plays on its 'good nature' encouraging people to play in order to raise funds for essential services/charities. Such approach is not taken with the purchase of other addictive products. We would recommend these issues be looked at for the CAP and BCAP to provide further protection around gambling harms to young people and the vulnerable.

References:

- i. Griffins & Wood 2001 The psychology of lottery gambling. International Gambling Studies. 1, 27-4
- ii. Jeffrey L, Derevensky, Rina Gupta April 2007. Internet gambling amongst adolescents. A growing concern.
- iii. Responsible Gambling Council Sept 2016