

Gambling Health Alliance response to CAP and BCAP consultation on the age used for scheduling and targeting of National Lottery advertising

The [Gambling Health Alliance](#) (GHA) is a coalition of 50 organisations and individuals with a shared interest in reducing the damage caused to health and wellbeing from gambling. The secretariat is provided by the [Royal Society for Public Health](#) (RSPH). The objective of the Alliance is to support policy-making to address the social, economic and cultural factors that contribute to gambling harm and the inequalities in health caused by it. We do this by highlighting gambling-related harm, engaging with policy makers, and promoting evidence that can be translated into reducing gambling harms.

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 National Lottery advertising. Raising the legal age for purchasing National Lottery products from 16 to 18 years old is a necessary step towards protecting young people from gambling harms, and therefore adverts for these products should follow the same rules.

In [our response to the Gambling Act Review call for evidence](#) we advocated for taking a public health approach to reducing gambling harms. Though the public health approach requires population-level harm reduction strategies, it also acknowledges that protections for specific groups who may have an elevated risk of experiencing harm should be targeted accordingly. Given that youth engagement with, and recall of youth participation in the National Lottery are both associated with disordered gambling in adulthood,¹ we welcome the increase in age of purchase. To support this change, we **recommend a ban on National Lottery advertisements aimed at under 18s, and extension of this ban to under 25s**. This should be an initial step towards ending all gambling advertising, sponsorship and promotion, in order to de-normalise this activity. We believe a similar approach should be taken to gambling like that towards smoking and foods which are high in fat, sugar and salt on the grounds that gambling is also a public health issue with numerous harms to health, wellbeing, finances and quality of life.

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:]

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<https://repository.uel.ac.uk/download/04fcdd3e2b061fd5014ad2f3454c180c1a9f50d9fa74c43c310adb9330923825/477232/%5B20635303%20-%20Journal%20of%20Behavioral%20Addictions%5D%20Associations%20between%20recalled%20use%20of%20legal%20UK%20youth%20gambling%20products%20and%20adult%20disordered%20gambling-2.pdf>

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

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 old, and would like to see this as an initial step towards the goal of ending all gambling advertising.

We recommend banning adverts aimed at under 18s, and propose extending this ban to 18 to 25 year olds. It is estimated that 55,000 children aged between 11 and 16 years old experience gambling problems,² and we know that legal participation in gambling in childhood is associated with problem gambling in adulthood.³ Recent research highlighted the extent of gambling harms even among those who bet small sums of money: they were more likely to suffer financial hardship and unemployment, while heavier gamblers were more likely to die prematurely.⁴ Therefore in our response to the Gambling Act Review, we called for an end to all gambling for under 18s, in order to protect this group who are evidentially at greater risk of experiencing gambling problems and harms, particularly as they grow into adults with access to all forms of gambling. Thus, on the path to ending all gambling advertising, removing adverts that appeal to under 18s is a step in the right direction.

Gambling advertising has been shown to drive gambling behaviour. Research conducted by Ipsos Mori and commissioned by GambleAware⁵ showed that 85%, 70% and 66% of those aged 11 to 24 years old reported seeing gambling adverts on TV, in shops and on social media platforms respectively. The research found that there was high awareness of gambling brands due to high levels of exposure, and that for young people who did not currently gamble, exposure to advertising was significantly associated with likelihood to gamble in the future, after controlling for demographics and other factors.

Other research studies have also found that increased exposure to gambling advertising increases the likelihood of participating in gambling.^{6,7}

However, we question the practicalities and logic of changing National Lottery adverts from appealing to 16 year olds to appealing to those aged 18 and above. Something that appeals to an 18

² <https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019.pdf>

³

<https://repository.uel.ac.uk/download/04fcdd3e2b061fd5014ad2f3454c180c1a9f50d9fa74c43c310adb9330923825/477232/%5B20635303%20-%20Journal%20of%20Behavioral%20Addictions%5D%20Associations%20between%20recalled%20use%20of%20legal%20UK%20youth%20gambling%20products%20and%20adult%20disordered%20gambling-2.pdf>

⁴ <https://www.nature.com/articles/s41562-020-01045-w>

⁵ <https://www.begambleaware.org/media/2160/the-effect-of-gambling-marketing-and-advertising-synthesis-report-final.pdf>

⁶ <https://www.sciencedirect.com/science/article/pii/S2352154620300309?via%3Dihub>

⁷ <https://www.begambleaware.org/media/2161/the-effect-of-gambling-marketing-and-advertising-quants-report.pdf>

year old is still likely to appeal to a 16 year old. It would be very difficult or near-impossible to construct an advert that does not appeal to a 16 year old, but does appeal to someone two years older. Taking a precautionary approach, we suggest National Lottery adverts should not appeal to those under the age of 25.

The proposed wording implies that those aged 18 years and above will be targeted by these adverts, when in fact we should be doing more to protect 18 to 25 year olds, as this group is more at risk of experiencing gambling harms. Problem gambling is associated with suicidality in young men and women.⁸

When we polled the general public in February 2021, we found that of the 18 to 24 year olds who reported gambling, playing the National Lottery was the most common form, with 45% of this age group saying they mostly spend the money which they gamble in this way. Our polling showed that three quarters of gamblers (75%) and non-gamblers (73%) supported introducing greater protection for 18 to 25 year olds when they are legally able to gamble for the first time. For instance, this could mean not targeting National Lottery adverts to anyone under the age of 25. This approach may provide better protection for 16 and 17 year olds, as adverts aimed at those aged 25 years and above are less likely to appeal to minors than adverts designed for those aged 18 years and above.

Finally, measures to ensure gambling advertising does not appeal to minors should apply to emerging forms of marketing. Celebrities and social media influencers are a powerful tool used by the advertising industry, and from research we conducted with young gamers about gaming and gambling, we know that celebrity and influencer advertising particularly appeals to young people.⁹ We suggest that adverts designed to not appeal to under 25s should not include celebrities or influencers, and that the CAP and BCAP should work with social media platforms to ensure gambling advertisements cannot be targeted at under-25s.

For more information on this response please contact XXXXX: gha@rsph.org.uk.

These recommendations reflect priority areas for action agreed by GHA members. Individual members may submit their own recommendations with their organisational priorities. A full list of GHA members can be found [here](#).

⁸ [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(20\)30232-2/fulltext](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(20)30232-2/fulltext)

⁹ <https://www.rsph.org.uk/static/a1de6ee4-105b-412d-87ade0cc08709d72/CAP-and-BCAP-consultation-on-guidance-on-advertising-in-game-purchases.docx>