

# Code Red

## Young People and their Exposure to Gambling Marketing through Media and Sport on the island of Ireland



# About This Report

## Project Team

Prof. Aphra Kerr (MU & UCD), Co-PI

Dr Paul Kitchin (UU), Co-PI

Prof. John O' Brennan (MU), Co-PI

Ms Erin McEvoy (UU), Research Associate

Dr Tuğçe Bidav (MU), Postdoctoral Research Associate

Mr Eamonn Sullivan (MU), Research Assistant

## Project Partners

Barry Grant: Extern Problem Gambling (Ireland)

Extern Problem Gambling provides help to anyone on the island of Ireland who has been impacted by gambling harms - whether through their own gambling or that of a loved one.

<https://www.problemgambling.ie/>

James Grimes, Barry Fennell, Declan Cregan: Gambling with Lives (Northern Ireland)

Gambling with Lives support bereaved families impacted by gambling-related suicide, raise awareness of the devastating effects of gambling disorder, and campaign for change. Their vision is a world free from gambling-related suicides. <https://www.gamblingwithlives.org/>

## Further Materials

Data Management Plan from Oct. 2024 – <https://dmponline.dcc.ac.uk/plans/113946/>

North-South Research Programme - <https://hea.ie/policy/research-policy/north-south-research-programme/>

Please cite as: Kerr, A., Kitchin, P., O' Brennan, J., Bidav, T. and McEvoy, E., (2024) 'Code-Red: Young People and their Exposure to Gambling Marketing through Media and Sport on the island of Ireland'. Final Report of the Youth, Gambling Marketing and the Shared Ireland project. Maynooth University, Maynooth, Ireland.

ISBN: 978-1-7392351-7-8

## Acknowledgements

We acknowledge and thank our funders, the North-South Research Programme of the Department of Further and Higher Education, Research Innovation and Science (DFHERIS) and the Shared Island Unit at the Department of the Taoiseach. We also wish to thank the Higher Education Authority (HEA) team who administered and supported the scheme.

The MU team would like to acknowledge the support the Department of Sociology and Ulster University would like to acknowledge the support of the Sport and Exercise Sciences Research Institute. Both MU and UU teams would like to acknowledge the support of the Maynooth University Social Sciences Institute (MUSSI) and the Maynooth Research Development office.

# Contents

<b>Section</b>	<b>Page</b>
Executive Summary	4
Recommendations	5
1.0 Introduction	7
2.0 Prior Work on Sport, Gambling Marketing and Exposure	9
3.0 Research Aims and Objectives	13
3.1 Methodology	13
4.0 Research Findings	15
4.1. Young People’s Awareness, Exposure, and Perceptions of Gambling Marketing through Sports	15
4.1.1 Introduction	15
4.1.2 Focus Group Findings	15
4.1.3 Discussion	16
4.1.4 Summary	17
4.2 Gambling Marketing Strategies on Broadcast TV and Instagram	17
4.2.1 Introduction	17
4.2.2 Exposure, volume and frequency – Broadcast TV	18
4.2.3 Exposure to Gambling Marketing on Instagram	20
4.2.4 Marketing Appeal Strategies	22
4.2.5 “Responsible Gambling” Messages	23
4.2.6 Discussion	23
5.0 Gambling Marketing Policy Implications	27
5.1 Ireland	27
5.2 Northern Ireland	29
5.3 Gambling Marketing Policies in other Jurisdictions	31
6.0 Concluding remarks	33

# Executive Summary

- Our research has found that gambling marketing exposure has reached saturation levels on certain sports programming on television across the island of Ireland and that this is further exacerbated by intensive social media campaigns by gambling operators.
- Saturation refers to an extremely high number of explicit and implicit marketing references, made frequently and throughout live sports programmes, supplemented by references before and after television programmes in advertising breaks and through social media content.
- References to gambling are made by gambling operators, media commentators, sports and cultural celebrities, the National Lottery and other non-gambling brands.
- Young people (aged 14-24 years) in our research were exposed to gambling marketing constantly through sports consumption on their mobile phones, on television and in their towns and villages.
- Young people in our research consume sport mainly via social media on mobile phones. They watch and share television sport highlights and clips on social media and they follow sport and other celebrities and influencers online.
- Young people felt that gambling marketing prioritised winning and a positive view of gambling.
- Many young people felt that gambling operators sponsoring sport was preferable to certain other industries as in their view there is a 'natural' relationship between sport and gambling. This points to a worrying normalisation of the relationship between betting and sport.
- Young people are largely unaware of the range of gambling harms beyond financial losses and how gambling could impact on their lives and the lives of others.
- Young people report knowing other young people under 18 who gambled.
- We found that televised sports programmes of darts, horse racing meetings in the UK and Ireland, as well as English Premiership and European football matches are saturated with gambling marketing references. Other sports programmes analysed had much lower levels of gambling marketing.
- Formal advertisements constitute only a small number of these references, and marketing content includes prominent brand logo display and name sponsorship, celebrity endorsements, videos and video reels, hash tags and significant levels of (often disguised) product placement.
- Gambling marketing rarely employs female celebrities and does not currently target women's sports in a significant way.
- Some of the content marketing on television and Instagram appeals to young people given the celebrities employed to relay messages, or because of the language or style of what is being communicated (e.g. humour).
- The television sports programmes analysed were broadcast mostly during daytime or before the watershed (21.00) when it can be assumed that young people may be watching. Regardless of the time of day, the television sports programmes analysed did not carry any warnings about the risks attached to gambling within the programmes.
- On Instagram, gambling companies produce a lot of videos (i.e. reels), celebrity partnerships and challenges. This content does not appear to be explicit gambling marketing but rather indirectly glamorises gambling and builds brand awareness.
- Many 18+ labels and warnings about gambling on social media content are often obscured or too small to read.
- The island of Ireland cannot be said to have liberalised its gambling markets because in both jurisdictions it is not adequately regulated. Existing regulations on gambling marketing are out of date for contemporary marketing communications.
- Both jurisdictions rely on the gambling industry, the media and sporting organisations to self-regulate with 'light touch' oversight. Given the responses from the young participants and the findings of our media analysis, this approach is failing and warrants calling a 'Code-Red' emergency.

# Recommendations

1. Citizens in both Ireland and Northern Ireland need their governments to urgently implement legislation to curtail the volume, frequency and timing of gambling marketing. This is especially important on broadcast and on-demand television distributed before the watershed (up to 21.00), and online.
2. Specific regulations covering the content of gambling marketing in Ireland and Northern Ireland need updating to cover contemporary marketing strategies. The implementation and updating of these regulations by the appropriate bodies needs to regularly be assessed by independent agencies, not by the gambling industry.
3. Sports organisations that operate on the island of Ireland, and receive state funding, should be required to eliminate their reliance on gambling marketing at all sporting events venues, and especially from areas visible in broadcast programmes.
4. Professional broadcast and social media practice guidelines need to be updated to recognise gambling as a public health issue and to remove gambling marketing references from live and sports highlights programmes before 21.00. They should be required to display gambling warnings if carrying gambling marketing in sports programmes.
5. Gambling marketing regulation requires a cross departmental (justice, health, sport, education) approach. Gambling marketing through live sport (especially football, horse racing, and darts) is a shared UK and Ireland public health issue. Institutional structures and initiatives need to be developed to facilitate regulators to share best practice and work together across these borders where appropriate
6. The gambling levy in both jurisdictions needs to be used to fund a public health and education campaign focussed on 1) prevention and awareness of both individual and societal gambling harms, 2) to provide publicly funded treatments (including specific treatment programmes for young people), and to 3) fund research on the island of Ireland. Specific attention needs to be paid to promoting the awareness of gambling harms among young men.







# 1.0 Introduction

While all marketing aims to inform audiences about the features of goods and services, gambling companies build brand awareness and position their brands in consumers' minds, being especially visible during some live sporting events.<sup>1</sup> An international research movement is prioritising social and public health perspectives on gambling harms, with gambling exposure being a major factor that can influence the nature and extent of such gambling harms.<sup>2</sup> Research is particularly concerned about the impacts of gambling marketing exposure on children and on those who have experienced gambling harms and are now in recovery.

The island of Ireland provides a unique comparative context from which to study live and mediated forms of sport. Ireland and Northern Ireland share much the same media culture, with many households accessing the same public service media services (BBC, RTE), commercial (UTV), satellite (Sky) and pay for view television, and online media services (e.g. Instagram, TikTok, Facebook, WhatsApp). Some sports have combined all Ireland teams (e.g. rugby, hockey, cricket) or all Ireland competitions (e.g. Gaelic games). Athletes from Northern Ireland can opt to be part of Ireland or Team GB at various international sporting events, including the Olympic and Paralympic Games. At the recent Paris Olympics, for example, three of Northern Ireland's seven medal winners competed for Ireland. Sports fans, including intergenerational age groups, frequently travel across the border to support their favourite teams.

However, the policy and regulatory situation for gambling is very different. Gambling was deregulated in Great Britain in 2005, and this coincided with a substantial growth in gambling marketing on broadcast television channels originating in Great Britain that specialise in live sport. The subsequent growth in social media has added another dimension. Meanwhile, we are awaiting updated gambling legislation in Ireland and Northern Ireland as the current regulation in both jurisdictions predates digital television and the internet.

The increasing availability of an array of video-on-demand services, satellite television and social media has meant that there is wide access to transnational media services which are not regulated on the island of Ireland. These services also provide a range of interactive and participative possibilities – from liking and sharing content to commenting. Betting on sport has grown exponentially, especially in the era of social media, a small but significant percentage of all adults over the age of 18 state that they bet on sport. International research has consistently demonstrated that younger people are more likely to bet on sport, especially young men.<sup>3</sup>

It is the cultural and participative nature of mediated live sports that is attractive to gambling companies who wish to market their goods and services. They are not the only ones who benefit financially. On the island of Ireland, most mediated sport is provided on commercial channels and platforms or, on public service media that also takes commercial income (e.g. RTE). As such most broadcast and online platforms charge commercial entities to advertise on their channels. In addition, the State charges a license fee on all commercial gambling operators and places a levy on gambling. In Ireland, Horse Racing Ireland (HRI) and Greyhound Racing Ireland (GRI) are the exclusive beneficiaries of the gambling levy. In 2024 HRI will receive €76 million,<sup>4</sup> an increase of more than €3 million over 2023 while the GRI will receive €19 million. This government levy and licensing regime in Ireland is separate to the working of the National Lottery which has its own regulator. Finally, many sports clubs on the island of Ireland rely on commercial sponsorships to provide and help maintain their facilities.

This research project on young people's exposure to gambling marketing through live sport on television and social media on the island of Ireland was conducted jointly by social science academics at Maynooth University in Ireland and at Ulster University in Northern Ireland over a period of two years. The project was funded by the North-South Research Programme under the Government of Ireland's Shared Island programme and administered through the Higher Education Authority (HEA) in Ireland.

<sup>1</sup> Raffaello Rossi and Agnes Nairn, "New Developments in Gambling Marketing: the Rise of Social Media Ads and Its Effect on Youth," *Current Addiction Reports* 9, (2022): 385-391, <https://doi.org/10.1007/s40429-022-00457-0>

<sup>2</sup> Max Abbott et al., *Conceptual Framework of Harmful Gambling: An International Collaboration* (Guelph, Ontario, Canada: Gambling Research Exchange Ontario, 2018); Margo Hilbrecht et al., "The Conceptual Framework of Harmful Gambling: A Revised Framework for Understanding Gambling Harm," *Journal of Behavioral Addictions* 9, no. 2 (2020): 190-205, <https://doi.org/10.1556/2006.2020.00024>

Gerda Reith, Heather Wardle, and Ian Gilmore, "Gambling Harm: A Global Problem Requiring Global Solutions," *The Lancet* 394, no. 10205 (2019): 1212-14, [https://doi.org/10.1016/S0140-6736\(19\)31991-9](https://doi.org/10.1016/S0140-6736(19)31991-9)

<sup>3</sup> Gianluca Di Censo, Paul Delfabbro, and Daniel L. King, "Examining the Role of Sports Betting Marketing in Youth Problem Gambling," *Journal of Gambling Studies* (2024), <https://doi.org/10.1007/s10899-024-10347-x>

Matthew Rockloff et al., *Victorian Population Gambling and Health Study 2018–2019* (Melbourne, Australia: Responsible Gambling Foundation, March 2020), <https://responsiblegambling.vic.gov.au/resources/publications/victorian-population-gambling-and-health-study-20182019-759>

<sup>4</sup> Brian O'Connor, "Irish Horseracing Regulatory Board to Receive No Extra Operational Funding from HRI in 2024," *The Irish Times*, December 18, 2023. Accessed September 10, 2024, <https://www.irishtimes.com/sport/racing/2023/12/18/horse-racing-ireland-allocates-173m-to-integrity-services-for-2024>





The 'Shared Island' perspective is critical to the design and findings of the research. The report includes the voices of young people on both sides of the border who encounter gambling marketing, and their awareness and perceptions of gambling marketing. It includes analysis of sports programming and social media campaigns which cross borders with little impediment. We also ran knowledge exchange workshops with two charities, Extern Problem Gambling in Ireland and Gambling with Lives who operate in Northern Ireland and Great Britain. This has provided us with insights into the lived experiences of those experiencing gambling harm and ongoing efforts on the ground to build awareness of commercial gambling marketing tactics. We believe this provides us with a unique data set from which to make policy recommendations. The rest of this report outlines the theoretical motivation, the research methods, our findings and our policy recommendations in more detail.

## 2.0 Prior Work on Sport, Gambling Marketing and Exposure

Fulton defines gambling as "an activity... involving participation in games of chance for money."<sup>5</sup> For Abbott et al. gambling is defined as "staking money, or something of material value, on an event and where there is an uncertain outcome in the hope of winning additional money and/or material goods."<sup>6</sup> In both commercial and non-commercial gambling money is wagered and lost by many, and there is potential for individual and social harm. Not all gambling activity has the same level of harm. Langham et al. list eight different gambling related harms including both individual and social harms – ranging from financial, to relationship breakdown, to significant health impacts.<sup>7</sup>

Global social media marketing spending grew from €51.3 billion in 2017 to €181 billion in 2021 and estimates suggest it may reach €255.8 billion by 2028.<sup>8</sup> In the U.K. in February 2020, the National Audit Office estimated there was a 56% increase in advertising spend by gambling operators between 2014 and 2017, with the greater part of this (£1.5 billion) spent on digital advertising.<sup>9</sup>

Studies have shown that the large gambling operators have substantial numbers of followers and regular activity on their social media accounts. One study found that the five largest betting operators in the U.K. (Betfred, Bet365, Coral, Flutter/Paddy Power, Ladbrokes/Entain) posted almost 20,000 tweets within eight months in 2019, an average of almost 80 per day.<sup>10</sup>

Work by Reith on the use of new technologies by the gambling industry<sup>11</sup> and by Newall et al. on the growth of gambling marketing through sport<sup>12</sup> would suggest that sport is used strategically by gambling operators to target existing and new gamblers. In the UK researchers have found that gambling advertising focuses on reducing the perceived sense of risk involved in gambling and enhancing the illusion of control by the gambler.<sup>13</sup>

Research indicates that 'Gen Z' is a cohort particularly vulnerable to gambling advertising, as they have grown up with social media platforms and are engaged intensively with them<sup>14</sup>. Research has shown that gambling operators deliberately target

<sup>5</sup> Crystal Fulton, *Playing Social Roulette: The Impact of Gambling on Individuals and Society in Ireland* (University College Dublin, June 2015), 8 <http://hdl.handle.net/10197/6796>

<sup>6</sup> Abbott et al., *Conceptual Framework of Harmful Gambling*, 3.

<sup>7</sup> Erika Langham et al., "Understanding Gambling Related Harm: A Proposed Definition, Conceptual Framework, and Taxonomy of Harms," *BMC Public Health* 16 (2015), <https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-016-2747-0>

<sup>8</sup> Rossi and Nairn, "New Developments in Gambling Marketing."

<sup>9</sup> Rossi and Nairn, "New Developments in Gambling Marketing."

<sup>10</sup> Raffaello Rossi and Agnes Nairn, *What Are the Odds? The Appeal of Gambling Adverts to Children and Young Persons on Twitter* (University of Bristol, October 2021). <https://www.bristol.ac.uk/media-library/sites/management/documents/what-are-the-odds-rossi-nairn-2021.pdf>

<sup>11</sup> Gerda Reith, *The Age of Chance: Gambling in Western Culture* (London: Routledge, 2005).

<sup>12</sup> Phillip, W.S. Newall, et al. "Gambling Marketing from 2014 to 2018: A Literature Review". *Current Addiction Reports* 6 no 2 (2019): 49–56. <https://doi.org/10.1007/s40429-019-00239-1>

<sup>13</sup> Hibai Lopez-Gonzalez, Ana Estévez, and Mark D. Griffiths, "Marketing and Advertising Online Sports Betting: A Problem Gambling Perspective," *Journal of Sport and Social Issues* 41, no. 3 (2017): 256–72. <https://doi.org/10.1177/01937235177055> (NOTE: THIS IS A DEAD LINK)

<sup>14</sup> Brooke Auxier and Monica Anderson, *Social Media Use in 2021* (Washington, DC: Pew Research Center, April 2021). Accessed September 10, 2024. [https://www.pewresearch.org/internet/wp-content/uploads/sites/9/2021/04/PI\\_2021.04.07\\_Social-Media-Use\\_FINAL.pdf](https://www.pewresearch.org/internet/wp-content/uploads/sites/9/2021/04/PI_2021.04.07_Social-Media-Use_FINAL.pdf)

Jean M. Twenge, Gabrielle N. Martin, and Brian H. Spitzberg, "Trends in U.S. Adolescents' Media Use, 1976–2016: The Rise of Digital Media, the Decline of TV, and the (near) Demise of Print," *Psychology of Popular Media Culture* 8, no. 4 (2019): 329–45. <https://doi.org/10.1037/ppm0000203>





a young demographic.<sup>15</sup> Gambling companies use celebrities and social media influencers in their promotions to create additional appeal and recall, increase social acceptance of gambling and lower perceptions of risk.<sup>16</sup>

Previous research in Ireland has found that gambling advertisements were shown in 75% of the live televised sporting events analysed between December 2018 and July 2019 across football, rugby, Gaelic football and hurling.<sup>17</sup> A 2024 study by Murphy, Murphy and Roberts with 397 Irish university students, aged between 18 and 25, found a high rate (15%) of individuals with a gambling disorder.<sup>18</sup> Participants in the study were more likely to identify as disordered gamblers “if they were male, had online gambling accounts, mobile gambling apps, scored high in impulsivity, scored low in fear of uncertainty, or consumed high volumes of alcohol in typical drinking sessions”. Moodie, Morgan and Alexandrou (2024) reported high exposure to gambling marketing across a group of young gamblers, aged, 18 to 34 and across a range of risk categories (low, medium, high on the PGSI scale).<sup>19</sup>

Much of the available research on gambling marketing and sport relates to Great Britain, Australia, Canada and New Zealand. While useful, it is imperative that policy developed for Ireland takes account of local social, cultural and political-economic conditions as well as regulatory developments in other European jurisdictions. There is little prior research on gambling marketing on social media used by youth, especially the newer (and highly popular) platforms such as Instagram.

This two-year project was motivated by the lack of qualitative research on exposure and attitudes of young people to gambling marketing using (mediated) sport on the island of Ireland. We set out to investigate the amount of gambling advertising now permeating broadcast televised sport and social media platforms. Our project adds to the evidence base emerging nationally and internationally on gambling marketing exposure, recall and strategies and the advocacy work of local health practitioners, journalists and those with lived experience of gambling harms.



<sup>15</sup> Di Censo, Delfabbro, and King, “Examining the Role of Sports Betting Marketing.”

<sup>16</sup> Hannah Pitt, Simone McCarthy, Melanie Randle, Mike Daube, and Samantha L. Thomas, “Young People’s Views about the Use of Celebrities and Social Media Influencers in Gambling Marketing,” *Health Promotion International* 39, no. 1 (February 2024), <https://doi.org/10.1093/heapro/daae012>

<sup>17</sup> David Columb, et al. “Gambling Advertising during Live Televised Male Sporting Events in Ireland: A Descriptive Study”. *Irish Journal of Psychological Medicine* 40 no 2 (2020): 134–42. <https://doi.org/10.1017/ipm.2020.78>

<sup>18</sup> Michael P. Murphy, Raegan Murphy, and Amanda Roberts, “Correlates of Problematic Gambling in Emerging Adult University Students in Ireland,” *Journal of Gambling Studies* (2024), <https://doi.org/10.1007/s10899-024-10323-5>

<sup>19</sup> Crawford Moodie, Amber-Jane Morgan, and Georgia Alexandrou, “Perceptions of Gambling Marketing among Young Adults Who Gamble in Ireland,” *International Gambling Studies* (May 2024): 1 – 19, <https://doi.org/10.1080/14459795.2024.2355907>





## 3.0 Research Aims and Objectives

This project aimed to understand how gambling companies market their products through sport to young people on the island of Ireland (including both the Republic and Northern Ireland). The project had 4 objectives, as outlined below.

### 3.1 Methodology

The methodology for this project was primarily qualitative as it was felt this was most appropriate to understanding the perceptions and attitudes of young people as well as understanding the content of marketing and other associated promotional content.

This project examined the exposure of youth and young adults aged (14-17 years and 18-24 years) to gambling marketing through live sports in Ireland and Northern Ireland. It also examined the content of such marketing on traditional broadcast and online media. We examined both direct and indirect marketing by gambling companies, lottery operators and other organisations who mention gambling and betting activities. The project proceeded in four phases:

**Phase 1 Oct 2022-Sept 2023:** Focus groups were conducted with 70 young people in both jurisdictions (Ireland N: 27, Northern Ireland N: 43; female N: 28, male N: 42) exploring their exposure, attitudes and understanding of gambling marketing (RO1).

**Phase 2 Sept 2024-July 2024:** Media content analysis of gambling marketing strategies surrounding a sample of transnational live sports broadcasts on television and social media content (Instagram) to explore the quantity, source, and ways in which gambling marketing targets young people (RO2).

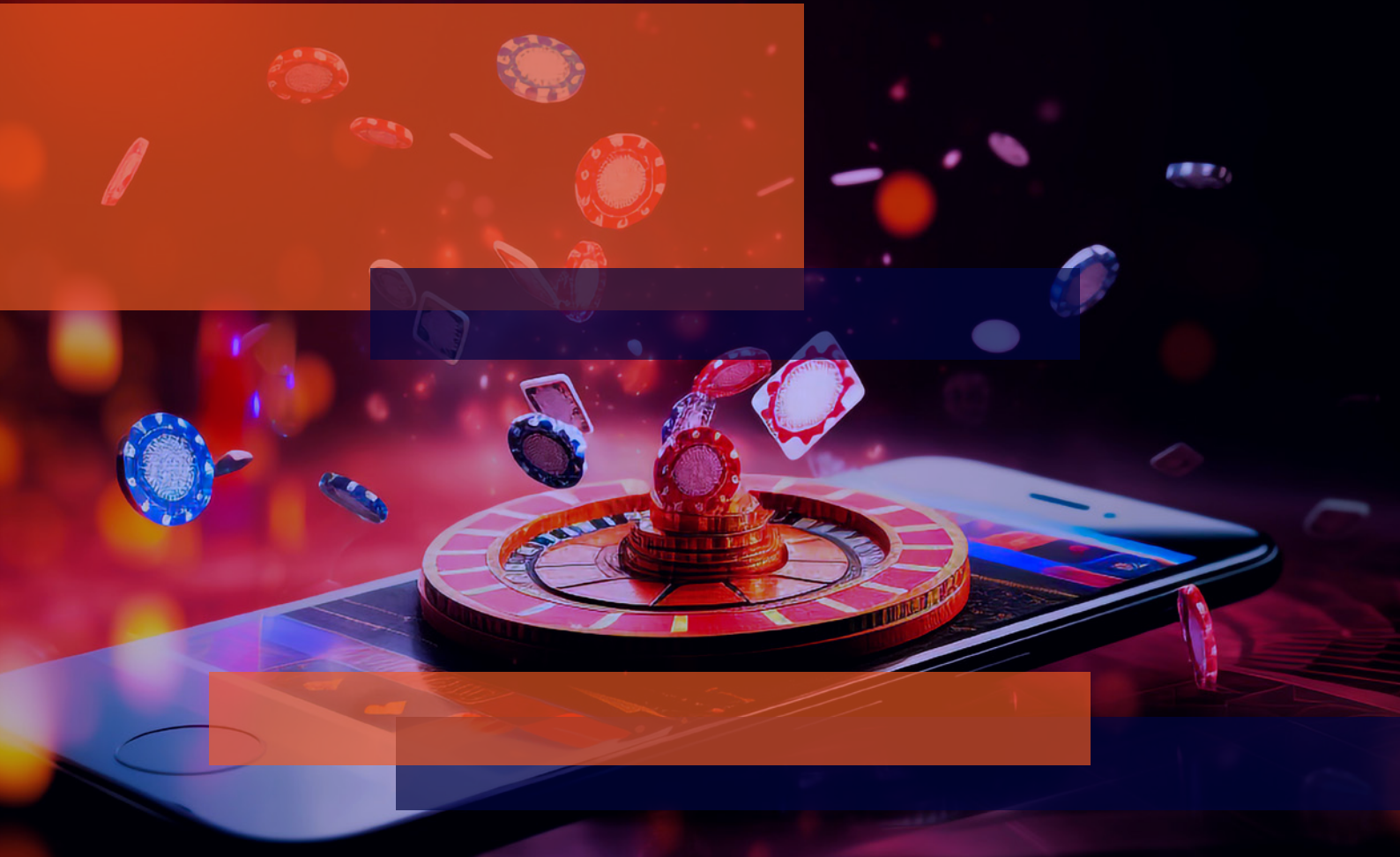
**Phase 3 June - September 2024:** Co-creation workshops of educational resources with our civil society partners in both jurisdictions to adapt their resources to include content from Ireland and content appropriate to young people (RO3).

**Phase 4 June-Oct 2024:** Dissemination and engagement with policy discussions.

Phase 1 of the research involving data collection from young people ages 14-24 was pre-approved by the Ulster University Research and Ethics Committee in 2023.



- **Research Objective 1 (RO1)** To examine the exposure of young people on the island of Ireland to sports gambling marketing, and its influence on their attitudes towards gambling and sport.
- **Research Objective 2 (RO2)** To identify how gambling operators and services market gambling products through sport on broadcast and social media to young people.
- **Research Objective 3 (RO3)** To co-create resources with local charities responsible for the delivery of gambling education workshops to young people.
- **Research Objective 4 (RO4)** To inform public policy on gambling marketing and the integrity of sport in both jurisdictions on the island of Ireland.





## 4.0 Research Findings

### 4.1. Young People's Awareness, Exposure, and Perceptions of Gambling Marketing through Sports

#### 4.1.1 Introduction

Exploring how young people are aware of and exposed to gambling marketing is important for understanding how these communications have shaped their perceptions about the relationship between sport and gambling and the extent to which gambling now features in the 'sports imaginary' of individuals on the island of Ireland. To establish such, we talked to young people in grouped conversations, located at various sites across the border region on the island over a period of 12 months.

To make the process comfortable for participants, we divided them into three age groups (14-15, 16-17, and 18-24 years – see Table 1 for a breakdown of participant age and gender and Table 2 for Locations by Age). We took steps to ensure that the meetings were interactive, which included not just questions and answers, but images and activities used to generate discussions.

**Table 1: Age and Gender of Participants**

Age	Total Count	Gender M	M%	Gender F	F%
14-15	28	15	54	13	46
16-17	23	16	70	7	30
18-24	19	11	58	8	42
<b>All</b>	<b>70</b>	<b>42</b>	<b>60</b>	<b>28</b>	<b>40</b>

**Table 2: Location of Focus Groups and Participant Numbers by Age**

Age	Derry/ Londonderry	Newry	Letterkenny	Total Count
14-15	8	8	12	28
16-17	7	6	10	23
18-24	6	8	5	19
<b>Total</b>	<b>21</b>	<b>22</b>	<b>27</b>	<b>70</b>

In managing the conversations, we were mindful not to focus solely on gambling: we discussed things like their preferences for watching sport on social media and on television. We explicitly did not focus on experiences of personal gambling behaviours but focused on their understanding and perceptions of gambling marketing through the media. In this section of the report, we summarise core findings and highlight how the information was used in subsequent stages of the research project. These findings allow us to present fresh insights into the lived experience of youth (including children, who have not yet been the focus of qualitative research on the island of Ireland before) and gambling marketing in this context.

#### 4.1.2 Focus Group Findings

Young people no longer need to fight for the remote control. Their access to sport is extensive, often immersive, and is mediated especially through social media, which has increased the choices available to young people to consume their preferred media.

Young people in our focus groups discussed their experience watching sport and they commented on how they enjoyed it, yet these experiences were very individualised. When asked what sports they preferred to watch, a wide and eclectic range of sporting events were offered (see Table 3) revealing diverse preferences for the consumption of sport.

In addition to broadcast sport programmes, young people told us of their preference for using social media which can be tailored and individualised. The broad picture to emerge from these discussions is that young people on the island of Ireland follow celebrities on Instagram, watch their favourite sports live on TikTok, they consume football match highlights largely on YouTube, and when not watching sport, they relieve their boredom through TikTok, whilst using Snapchat to communicate with their friends.

**Table 3: Focus Group Participants’ Sport Event Consumption Preferences**

Age	Named Sport	Named Teams / Events / Associations	Named Tournaments
14-15	Athletics, Basketball, Swimming, Tennis, Football, Rugby, Hurling, Gaelic, Soccer, Chess, UFC, Darts,	Athletics Ireland, Liverpool FC, Irish Rugby, Local Sporting Teams	Olympics, Champions League, The World Masters, The Diamond League
16-17	Football, Gaelic, Rugby, Netball, NBA, Soccer, F1, Tour De France, Boxing, Tennis, Horse Racing	Liverpool FC, Irish Rugby, Ulster Rugby, Manchester United FC	NFL Superbowl, Six Nations, Wimbledon, Grand National, Tour De France
18-24	Darts, Tour De France, Football, Grand National, Soccer, Rugby, F1, Racing, Athletics, NBA, NFL, Supercars, Hockey, Gaelic, Golf	"Probably Ireland [rugby] and Ulster [rugby]". Arsenal, Local Sporting Teams	Six Nations, NFL Superbowl, The Masters, The World Cup, Tour De France

During the conversations, the participants were shown images of three jersey sponsorships: one of Ireland Rugby and/or Dublin GAA – Sponsored by Vodafone (Telecoms), Stevenage FC – Sponsored by Burger King (Fast Food) and West Ham FC – Sponsored by Betway (Gambling). When asked why commercial partners like gambling companies sponsor sport, some young people talked about the advantages to the sport from such a sponsorship. Some mentioned that they allowed clubs to raise important funds that could support their work, in exchange for providing the paying brand good exposure.

We conducted an activity asking the participants to rank the sponsors from most to least appropriate. Surprisingly, 6 out of 8 groups (1 group was not set this task) ranked Betway as most appropriate. From the resultant discussions around these choices, many young people saw gambling as a normal part of sport. One young person observed “I think they’re a good match up” and another expressed the view that betting had more in common with sport than mobile telephones and fast food.

During the conversation, the topic of Social Media Influencers (SMI) was raised. Drawing on two examples of SMIs from sport and entertainment, with each being linked with gambling operators, we used videos and images to facilitate discussion. The participants were aware that celebrity influencers promote gambling online and were inconclusive on whether this was good or bad. In terms of the critical reflection offered by participants, some observed that the image used of the SMI posting a betting slip on Instagram does not necessarily mean the bet was actually placed. Some also commented that despite the SMI endorsing gambling, there was no guarantee of winning.

### 4.1.3 Discussion

Despite some concerning findings, it was clear to the researchers that the young people who participated in our study were not fooled easily. Many of the participants realised that gambling marketing paints an overly positive image and only ever focuses on winning:

**“It would kind of give you the impression that it’s okay to gamble all the time because they’re kind of promoting it... and it’s like, not a great one...”**

Female participant, 14, Derry/Londonderry

**“Sport is supposed to be fun and healthy, and then if you’re attaching something like gambling and risk, it promotes the wrong thing.”**

Male participant, 15, Letterkenny

So, it was clear that they understood the individual risks involved in gambling which could lead to financial ruin but saw this as an individual concern due to carelessness. However, even with probing from the research team, there was little knowledge of the wider social risks that potentially arise for the gambler’s immediate family, workplace or wider community or whether harm was due to individual carelessness or more insidious actions of the gambling operators. Further work on how young people form these views and the role of “responsible gambling” messaging in this process would be fruitful.

Despite possessing high levels of recall in relation to gambling marketing on television or on social media (which is consistent with the research emerging from other jurisdictions) and clearly having a view on the suitability of the fit between sport and

gambling, young people were adamant that these messages were not directed at them. For each age group we spoke to, all suggested that these messages were for other people, not them. This of course is concerning but particularly so when young men especially exhibit a significantly higher rate of harmful gambling than the population in general.

While the findings demonstrate that young people in this region are exposed to significant levels of gambling marketing, it is not just on mass and social media. Young people recalled how they see gambling imagery every day as they walk up the main streets of their towns, with one gambling operator the subject of high recall from several young people.

Additionally, young people told us that, especially around major events, gambling conversations and peer-to-peer bets are common. This reflects recent findings for teenagers in Northern Ireland that found 87% of all gambling occurs offline, which includes peer to peer gambling.<sup>20</sup> Thus, a singular focus on gambling advertising or on shirt sponsorships is too limited for regulatory control, relative to the scale of the marketing young people are experiencing.

#### 4.1.4 Summary

Parents, politicians, and policy makers must acknowledge that young people are exposed to gambling marketing through media from a wide variety of sources, especially through social media, and through the main street and peer-to-peer interactions. Consuming social media individually means that any interaction between a young person and a gambling operator online is likely to occur in private between them.

We would recommend our partners and others working in this area to reinforce the narrative about the social consequences of gambling harm as our young people were largely unaware of the social consequences of gambling harm, instead locating responsibility almost exclusively with the individual gambler.

Young people do not feel that “Responsible Gambling” messages are aimed at them, yet they can recall them and talk about them with some detail. So, it does seem that the messages are getting through, but are distorting young people’s understandings of the scope of harm and wider responsibilities. More work is needed on the relative effectiveness of such responsible gambling messaging and how it might be tailored effectively to reach young people on social media.

More work is also needed, and on a larger scale across the shared island, to further investigate the myriad forms of youth gambling and how mediated gambling messages inform young people’s understanding of risk.

Based on these findings from our focus groups, we sought to review the sport programmes and social media channel they preferred (Instagram) for gambling related marketing. That constituted the next stage of this research.

## 4.2 Gambling Marketing Strategies on Broadcast TV and Instagram

### 4.2.1 Introduction

Exploring how gambling companies market their products and services through sport on broadcast and social media to young people on the island of Ireland was the second objective of this study and this part of the research programme took place in the second year of the project.

Informed by our focus group findings, we first identified and recorded a range of live sporting events of interest to our young participants (i.e., football, rugby, darts, athletics, and horse racing). These events, including advertising breaks and pre/post-event discussions where possible, were recorded between October 2023 and January 2024 on various public service and commercial channels on both sides of the border. The negotiation of exclusive media rights by sporting bodies and media channels gave rise to a diversity of television channels.

Football and rugby matches featured men’s teams and darts featured only male players, but the horse racing programmes included female jockeys, trainers, television analysts and presenters. The athletics programme, on the other hand, featured European men’s and women’s races. All programmes, except one, were broadcast, or at least started broadcasting, before the watershed of 21.00. We then selected a sub-sample across the different sports recordings for analysis (see Table 4) keeping in mind diversity of channels, sports, and jurisdiction. These recordings were analysed following a coding framework adapted from previous research in this field.<sup>21</sup>

---

<sup>20</sup> Duane Roberts, *Experience of Gambling by Young People in Northern Ireland 2022* (Department for Communities, December 2023). Accessed September 10, 2024, <https://www.nisra.gov.uk/statistics/find-your-survey/young-persons-behaviour-attitudes-survey>

<sup>21</sup> Raffaello Rossi et al., *New Season, More Self-Regulation, More Marketing: The Prevalence of Gambling Adverts during the Opening Weekend of the English Premier League 2023/2024* (University of Bristol, September 2023).



The focus groups also allowed us to identify social media platforms that our young participants used to access sports media content (i.e., Instagram, TikTok, YouTube, Snapchat, WhatsApp, Facebook). We decided to focus on Instagram as our social media case study platform to examine gambling marketing strategies. Instagram was mentioned across all age groups that took part in this research, it had the highest percentage (N: 18, 94.7%) of usage among 18-24 years olds in our focus groups and the platform allows targeting those over 18 years old for branded content on gambling.

We collected a purposeful sample of Instagram posts (image and video) posted between October 2023 and early January 2024 and which were visible to platform users over the age of 18 in Ireland and the UK from seven major gambling operators' accounts (see Table 6). The collected posts were then analysed following a coding framework which was adopted from previous research.<sup>22</sup> In this section of the report, we summarise the core findings from our media content analysis.

## 4.2.2 Exposure, volume and frequency – Broadcast TV

Across the eight television broadcast programmes analysed, we identified a high volume and frequency of gambling messages, totalling 2,131 gambling references. No programme was free from gambling marketing.

**Table 4: List of Analysed Broadcast Recordings**

Date & Time of Day	Country	Channel	Sports event	Competition	Duration	Number of gambling references
Oct 14, 2023 21:00	UK	ITV Online	Rugby	Rugby World Cup / Ireland V New Zealand	03:19:54	5
Nov 28, 2023 20:00	UK	TNT Sports Online <sup>23</sup>	Football	UEFA Champions League / Paris Saint-Germain V Newcastle United	04:04:45	10
Dec 10, 2023 13:30	IE	RTE2	Athletics	European Cross Country Championship	01:03:15	11
Dec 27, 2023 14:50	UK	ITV	Horse Racing	Christmas Festival / Kempton / Chepstow Welsh National	03:11:22	627
Dec 28, 2023 14:25	IE	RTE	Horse Racing	Leopardstown Christmas Festival	02:20:13	264
Jan 1, 2024 17:15	IE	RTE2	Rugby	United Rugby Championship / Leinster V Ulster	02:44:54	16
Jan 3, 2024 20:00	IE	Sky Sports	Darts	World Darts Championship / Final	02:44:13	1159
Jan 7, 2024 16:30	UK	BBC	Football	FA Cup / Arsenal V Liverpool	02:56:10	39
<b>Total</b>			<b>8</b>		<b>22:24:46</b>	<b>2,131</b>

A gambling reference in terms of broadcast media corresponds to every instance where we recorded a gambling marketing communication (verbal and/or textual) from a gambling company, a broadcaster, or a commentator/presenter. These references included a variety of formats such as commercial adverts, verbal references, display of logos in various places, and sponsorship lead-ins. In one instance, gambling references in different formats were recorded separately until the camera switched to a new shot. Additionally, we recorded the number of logos to which viewers were exposed in one instance.<sup>24</sup>

<sup>22</sup> Sally M. Gainsbury et al., "An Exploratory Study of Gambling Operators' Use of Social Media and the Latent Messages Conveyed," *Journal of Gambling Studies* 32, no. 1 (March 2016): 125-41, <https://doi.org/10.1007/s10899-015-9525-2>

Mikaela Lindeman et al., "Gambling Operators' Social Media Image Creation in Finland and Sweden 2017–2020," *Nordic Studies on Alcohol and Drugs* 40, no. 1 (2023): 40-60, <https://doi.org/10.1177/14550725221111317>

Rossi et al., *New Season, More Self-Regulation, More Marketing*.

<sup>23</sup> TNT Sports are pay TV channels operating in the UK and Ireland and owned by Warner Brothers Discovery (Europe) and the BT Group.

<sup>24</sup> Richard I. Purves et al., "Examining the Frequency and Nature of Gambling Marketing in Televised Broadcasts of Professional Sporting Events in the United Kingdom," *Public Health* 184 (2020): 71-78

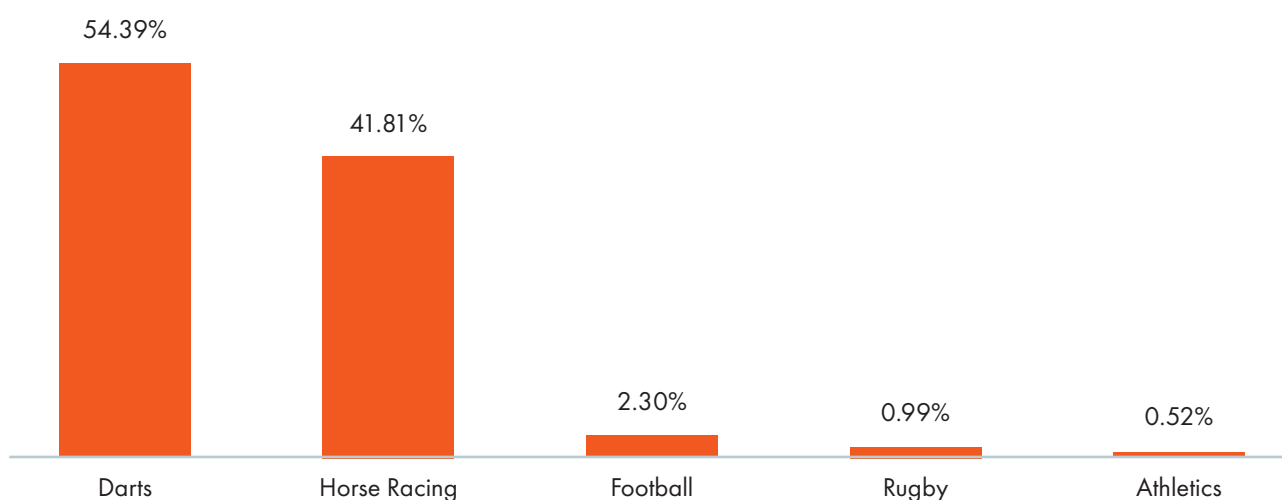
<https://doi.org/10.1016/j.puhe.2020.02.012>

Our findings reveal that **volume, frequency and exposure** to gambling marketing varies significantly across different sports, sporting competitions and television channels, with men’s darts, horse racing and men’s football being the most saturated forms of television broadcasts (see Table 4). In one darts programme analysed (officially named the Paddy Power World Darts Championships 2024) of 2 hours and 45 minutes duration there were 1,159 references to gambling. This was followed in volume terms by horse racing where the major Christmas festivals in the UK and Ireland carried 627 and 264 references to gambling, respectively. The latter was broadcast by RTE, Ireland’s public service broadcaster.

The two football programmes we analysed had significant differences in the format of recorded gambling references, depending on which channel they were broadcast on and which league the football match is in. For instance, the Arsenal vs. Liverpool match in FA Cup was broadcast on BBC where the gambling references (N: 39) appeared in electronic or static pitch sides, prerecorded video segments, and stadium crowd. The Paris Saint-Germain vs. Newcastle United match in UEFA Champions League was broadcast on TNT Sports Online where most of the gambling references were recorded in the form of commercial adverts during the ad breaks (N: 7).

Gambling references are starting to appear in the United Rugby Championship through team sponsorship in South Africa (Hollywood Bets Sharks, for example) but were much less obvious during the Rugby World Cup. In our sample, athletics was the least saturated with gambling marketing but not free from it as there were references to the lottery of the country where it took place, and more importantly one verbal reference where the commentator used the phrase ‘odds on’ to indicate Ireland’s chance of winning a medal. The percentage distribution of gambling references by sports in our sample can be seen in Figure 1.

**Figure 1: Percentage Distribution of Gambling References by Sports in our Sample**



By far the most extensive strategy used by gambling companies to increase brand visibility on broadcast media was through the display of gambling operator or service logos. A large majority of gambling references (N: 1962, 92%) were recorded as ‘logo/name only’ which were visible in various places or audible in verbal references. In these instances, either 1-3 (N: 1291, 66%) or more than 3 (N: 665, 34%) brand logos were displayed on the screen, ensuring their visibility to the audience. This repetitive placing of logos secures brand awareness and further increases the normalisation of gambling within sports.<sup>25</sup> Gambling references on televised live sporting events were not limited to the references made by gambling companies. We also recorded *indirect* references where the reference mentioned gambling activity broadly without reference to a specific brand (N: 106). For example, we observed instances such as studio conversations between the host and guests discussing the odds of specific horses in specific races, the commentator reading and explaining individual odds and market changes, and the reporter covering a specific horse and displaying its upcoming race odds on screen. This has been a common feature of coverage of horse racing for decades, but the number of such references has grown over time, as more and more opportunities are provided to gambling operators to feature in racing television broadcasts.

<sup>25</sup> These results may be lower than broadcasts on other channels

**Table 5: Direct Gambling Reference Frequencies in Different Formats**

Format	Count
Static Pitchside	1,021
Players Shirt	395
Prerecorded Video Segments (including match highlights)	218
Integrated On-Screen Graphics	120
Other	81
Stadium Crowd	80
Electronic Pitchside Full	57
Commercial Adverts (ad breaks)	31
Interview or Press Arena	29
Verbal References (including commentator or broadcaster references)	28
Stadium or Arena Structure	26
TV Studio	23
Sponsorship Lead-in	19
Electronic Pitchside Part	3
<b>Grand Total</b>	<b>2,131</b>

### 4.2.3 Exposure to Gambling Marketing on Instagram

Gambling companies’ content marketing strategies on Instagram increase the exposure of some young adults who enjoy consuming sports media on Instagram to gambling marketing. If they follow gambling companies or celebrities, media companies, and sports clubs who partner with gambling companies, their chance of exposure is high. Even if they do not follow the companies, the algorithmic nature of the platform, which shows users content that they are (likely) interested in based on their previous content viewing history, increases their chances of exposure.

The findings from our social media content analysis suggest that gambling companies engage in extensive content marketing on Instagram wherein they distribute native social media content to reach a wider audience of young and adult sports fans who might (not) typically follow or engage with gambling-related content. Native social media content here refers to platform-specific content (i.e., single/carousel image and vertical/horizontal video posts on Instagram) that is designed to match the expected style and tone on the platform, and thereby appears as an organic part of the platform users’ feed rather than a disruptive commercial advertisement. Different companies have different content strategies – with some focussing more on video, and others more on posts.

In line with our methodological approach to Instagram analysis, our findings give insight into the types of content to which Instagram users are potentially exposed and how these companies imagine their (potential) customers when building their brand image on Instagram.





**Table 6: List of Analysed Gambling Company Accounts on Instagram**

Instagram handle	Number of followers at the time of data collection	Number of posts at the time of data collection	Number of analysed image posts	Number of analysed video posts	Responsible gambling note on the accounts
@paddypowerofficial	187K	4,989	4	30	+18 begambleaware.org
@skybet	75.1K	4,526	17	3	Followers must be +18, begambleaware.org
@bet365	25.1K	6,001	13	22	+18 only. Do not forward to anyone under the age of 18. Gamble responsibly. begambleaware.org. safergamblinguk.org
@betwayuki	13.9K	1,478	24	0	Begamble aware.org. 18+.
@ladbrokes	13.8K	1,430	18	6	Followers must be 18+ begambleaware.org
@betfair	12.5K	2,550	11	4	Followers must be 18+ begambleaware.org. Gamble responsibly.
@boylesports	9,829	3,834	24	14	18+ Gamble Responsibly safergamblingweek.org
<b>Total</b>			<b>114</b>	<b>79</b>	

One prominent brand-building strategy employed by gambling operators is to share a wide variety of content types, especially sports content that is not directly related to gambling, to increase engagement and therefore their brand visibility on the platform. Such content includes ‘informative content’ related to upcoming sports events and statistics from earlier events, ‘entertainment content’ like sport-related humorous sketches and interviews with sportspeople, ‘promotional content’ such as information about their products and campaigns where they offer inducements for a time limited period, and ‘responsible gambling content’.

It is very clear that informative and entertainment content drives more audience engagement compared to responsible gambling messages and general content promoting companies’ services. Nevertheless, their brand name/logo appeared in 77% of the posts and their brand slogan/tagline was visible in 13% of the posts. Placing their operator brand name/logo and slogan/tagline helps gambling operators build their brand image within entertainment and sports communities.

Looking at different content types and the number of ‘likes’ each post received at the time of data collection, it is evident that the majority of posts by gambling companies (N: 121) received between 0-50 likes. It is, however, striking that ‘entertainment content’ by gambling companies received more likes, with 16 posts receiving between 1,001-5,000 likes. For ‘entertainment content,’ one gambling company, stands out on the platform by producing creative and relatable Instagram reels that appeal to a wide audience, significantly increasing brand visibility and recognition.

Furthermore, the findings reveal important disparities in exposure to gambling marketing based on certain sports. Out of the five sports that this research focused on it was football-related content that dominated gambling marketing on Instagram. Closer examination reveals references to teams, especially English Premier League football clubs with the most supporters such as Manchester City, Manchester United, Liverpool, and Arsenal. References to specific fixtures such as Manchester City vs. Liverpool and Arsenal vs. Manchester City in the posts increases the exposure of specific fan groups to gambling marketing. These teams are widely supported by young and old alike across the island of Ireland.

There is little to no reference to women’s sports in the collected Instagram posts: only in a few instances are women’s sports (N: 1) or a female trainer (N: 1) mentioned. Men were visible in 46% of the posts, whereas women were visible in only 16% of the posts we analysed. This reinforces the underlying gendered nature of gambling marketing.

Gambling brands also rely on celebrity/sportspeople endorsements on their Instagram accounts. This differs from the usual celebrity/sportspeople endorsements in commercial advertisements wherein celebrities or sportspeople perform a pre-scripted role. Rather, on Instagram, gambling companies often feature celebrities/sportspeople by sharing video interviews and quotes on specific sports events or other sports-related themes. Video interviews with sportspeople were especially popular for individual sports like darts, featuring several darts players during various championships. This would allow darts fans to connect with their favourite players more authentically (and regularly) while also functioning as a form of “sneaky gambling promotion.”<sup>26</sup>

#### 4.2.4 Marketing Appeal Strategies

From analysis of our sample of mass media and social media we were able to gather a substantial number of advertisements and identify additional marketing strategies across all channels. From this we were able to determine marketing appeal strategies that built upon the earlier work of our charity partners, Extern Problem Gambling and Gambling with Lives, which would become the focus of our co-creation workshops.

Appeal strategies are tactics used in commercial communication contexts to appeal to the needs, desires, and values of consumers. These appeals can be categorised as two main strategies: emotional and rational.

- **Emotional appeals** may include tactics like humour - designed to create laughter and positive associations with the product; nostalgia - designed to create a sense of comfort and familiarity; and fear - designed to highlight the potential negative outcomes of not using a product or service.
- **Rational appeals** include tactics such as convenience – designed to appeal to those in a hurry by focusing on the ease of use, or the accessibility of the product; comparison - designed to demonstrate how one brand is superior in performance to competing brands; and, scarcity - designed to create a sense of urgency as the availability of the product is limited.

A range of these appeals have been shown to be effective when targeted at children and young people. Previous research has demonstrated that certain appeals cut through the communication clutter for young people. This includes mixing appeals with celebrities, animals, along with any images of youth culture and counterculture<sup>27</sup>. In the context of gambling research, advertisements using these tactics within their appeals have been shown to elicit higher recall than those that do not<sup>28</sup>.

In attempting to regulate advertising practises, the Advertising Standards Agency (ASA) in the United Kingdom has recently updated its guidance on advertising appeals to young people. The use of celebrities that could appeal, or potentially appeal, to children and young people has been further limited; even the use of young people under the age of 25 in these advertisements has been restricted.

Both the Advertising Standards Agency and the Advertising Standards Agency of Ireland (ASAI) operate on their respective sides of the border on the island of Ireland (see section 5).

From a content analysis of the advertising communications deployed during our social and mass media analysis we identified six appeal strategies:

- 1) Celebrity
- 2) Free Offers/Inducements
- 3) Parody/humour
- 4) Value for Money
- 5) Social Responsibility
- 6) Community and Belonging

The revised ASA codes around gambling and young people banned the use of winning imagery and animals appeals in the United Kingdom, and it was noted in our analysis that in many, but not all cases, the gambling operators and advertising agencies have adapted to these new regulations. The ASAI code in the Republic of Ireland has not been updated to reflect the UK regulations which presents a consistency issue for gambling marketing on the island of Ireland.

---

<sup>26</sup> Alexandra Griffiths, “Campaigners Call for Stop to ‘Sneaky’ UK Gambling Ads on Social Media,” *Covers*, March 26, 2024. Accessed September 10, 2024, <https://www.covers.com/industry/campaigners-call-for-stop-to-sneaky-uk-gambling-ads-on-social-media-march-26-2024>

<sup>27</sup> Esther Rozendaal, Moniek Buijzen, and Patti Valkenburg, “Children’s Understanding of Advertisers’ Persuasive Tactics,” *International Journal of Advertising* 30, no. 2 (2011): 329–50, <https://doi.org/10.2501/IIA-30-2-329-350>

<sup>28</sup> Christian Nyemcsok et al., “Young People’s Recall and Perceptions of Gambling Advertising and Intentions to Gamble on Sport,” *Journal of Behavioral Addictions* 7, no. 4 (2018): 1068–78, <https://doi.org/10.1556/2006.7.2018.128>

## 4.2.5 “Responsible Gambling” Messages

On broadcast TV, “responsible gambling” (RG) messages (N: 43) were present and recorded only during commercial adverts and sponsorship lead-ins. These messages mostly appeared as small text in the top right corner of the screen through the display of the name of the RG organisation, RG tagline, and/or age limit. None appeared during the programmes themselves despite the frequency of gambling references in various formats.

Our data collection period on Instagram coincided with Safer Gambling Week (SG Week), a cross-industry initiative to promote safer gambling practices in Ireland and the UK, held in November each year. All seven gambling companies included in this research shared identical pre-prepared RG messages during the SG Week in 2023. While these Instagram posts were attention-grabbing with their use of vibrant colours (i.e., yellow, pink, purple, blue, and orange) against a navy background, the accompanying messages were generic. The messages included taglines such as ‘Let’s talk about safer gambling’, ‘Only spend what you can afford’, ‘Remember... Friends & family are more important than gambling’, and ‘Ask yourself... Are you past your spending limit?’. In these posts, gambling companies also tag Safer Gambling Week’s Instagram account (@SGWeek) and use the hashtag #SGWeek23.

Outside Safer Gambling Week, RG messages on Instagram appeared on gambling companies’ posts. However, these were mostly in the form of RG taglines such as ‘Take Time to Think’ and ‘Be Gamble Aware’ or displaying RG organisation websites and/or RG helplines. Indeed, our analysis has shown that such messages are often obscured when content, especially Instagram Reels, is viewed on smartphones. Less prevalent are messages about gambling harms or those which give detailed information about RG tools which users can use to place limits on session length, losses, spending or deposits. More importantly, 24% of the analysed Instagram posts did not include any RG message and 38% of them did not mention an age limit.

## 4.2.6 Discussion

Our media analysis has found that some sports and sporting competitions broadcast on television are saturated with references to gambling marketing. Gambling operators, sporting organisations, media companies and governments are complicit in this situation through either action or inaction.

The volume, frequency, and variety of gambling references in certain sports programmes are representative of a disturbing pattern of ‘gamblification’ of both sports programmes on television and sporting events. It raises questions about the integrity of both the sporting events analysed and sports media programming more generally. Some of the sports programmes analysed were on daytime television and were saturated with gambling marketing references. This practice completely ignores the public health risks of gambling and the high chance that children are either watching these sports programmes live or via highlights on social media apps.

The research findings demonstrate clearly that gambling companies utilise sports media consumption and the community and participative aspects of sport as a vehicle for their marketing and brand-building. Their marketing strategies are diverse and comprise a variety of formats to disseminate gambling marketing messages and construct brand awareness among a wide range of audiences across broadcast and social media.

While these messages might include overt expressions encouraging gambling, RG messages appear generic, and certainly inadequate, by displaying the names of RG organisations and/or an age limit. Further, these messages only appear on explicit gambling advertisements in the broadcasting context, and not during the sports programmes. Some programmes can therefore be conceptualised as extended sponsored content/advertorials for gambling since they do not carry any warnings about gambling risks. On social media on mobile phones, the messages can be obscured or appear so small that they are impossible to read in some cases.

Overall, gambling marketing and gambling references through mediated sport by gambling companies, media companies and sports organisations attempts to communicate and reinforce through constant repetition the dominant industry narrative that gambling is a normal part of sports media and a normal ‘leisure industry’. As with many industries, however, they carefully obfuscate, avoid, and conceal the individual and social risks and harms, including financial losses, relationship difficulties and criminality, that gambling generates.



Further, the media promotion strategies that we observed are highly gendered and the variance in the quantity of messages and the targeting strategies vary from a high in UK team-based men's football and darts to a low in the Rugby World Cup and European men's and women's athletics competitions. The use of certain sports and of humour, celebrities and informational appeal strategies would, we suggest, primarily appeal to young men.











# 5.0 Gambling Marketing Policy Implications

This section of the report examines the gambling policy context in Ireland and Northern Ireland, providing insight into the draft legislation going through the legislative process in Ireland and a 2024 All Party Committee (APG) report from the Assembly in Northern Ireland. The regulation of gambling marketing in both jurisdictions on the island of Ireland is fragmented, out of date, and relies to a large degree on self-regulation and industry codes of practice. The Gambling Regulation Bill (2022)<sup>29</sup> in Ireland seeks to introduce limits to gambling marketing, including ‘the volume and frequency of gambling advertising during sporting event broadcasts’ and introduce an option for customers of on-demand services to opt out of receiving gambling advertising from gambling operators. The bill has yet to be enacted.<sup>30</sup>

Some gambling regulation is a devolved matter for the Stormont Executive in Northern Ireland but the most recent regulation dates from 1985 (preceding the internet). While this regulation was updated in 2022 with the Betting, Gaming, Lotteries and Amusements (Amendment) Act (Northern Ireland), the Northern Ireland Assembly All Party Group on Reducing Harm Related to Gambling (2024) recommended restricting gambling advertising, especially online.

While policy makers on the island of Ireland have been slow at updating gambling legislation, recent years have seen purposeful efforts by governments elsewhere to bridge the gap and put in place meaningful and effective regulation of gambling marketing. We briefly examine regulatory efforts in Belgium and Italy to offer insight into the scale of change needed in relation to gambling marketing regulation in Ireland and Northern Ireland. This analysis, along with our focus group and media analysis findings, provides the basis from which we offer our policy recommendations.

## 5.1 Ireland

Gambling is viewed as a public health issue in many countries but this perspective and actions to support it are only starting to emerge in Ireland. Prior research by Fulton in Ireland argued strongly that the social impact of gambling is much wider than the individual gambler, and families, communities and health services are significantly impacted by gambling harms.<sup>31</sup>

Monitoring of gambling disorder and the prevalence of gambling related harms in Ireland is irregular but the data that exists suggests that the number experiencing gambling disorder is substantial. A 2023 report by a research team based at the Economic and Social Research Institute (ESRI) found that there were 130,000 people in Ireland with an addiction to gambling.<sup>32</sup> This equates to a prevalence rate of 3.3%, a level ten times higher than was found in previous national prevalence research.<sup>33</sup>

In addition, the ESRI report suggested another 279,000 people, or 7.1% of the population, show moderate evidence of harmful gambling. Amongst people in the highest risk category the average weekly spend on gambling was €231, equating to about €12,000 per year, a very significant amount, especially for those in lower socioeconomic categories. Among the cohort adjudged to be at moderate risk, the weekly spend was about €70, equating to about €3,500 per year. The 3.3% in the most serious risk category account for 28% of the gambling spend in Ireland.<sup>34</sup> A 2024 study by Condrón, Lyons and Carew found that problem gambling in Ireland frequently co-occurred with abuse of alcohol (85.6%), followed by cannabis (32%), cocaine (28%), and benzodiazepines (10.9%).<sup>35</sup> Emphasising the link between gambling marketing and gambling harms, in 2021 the College of Psychiatrists in Ireland called for an outright ban of the advertisement of gambling within live sport.<sup>36</sup>

<sup>29</sup> Department of Justice (2024) Gambling Regulation Bill 2022. Accessed September 10, 2024, <https://www.oireachtas.ie/en/bills/bill/2022/114/>

<sup>30</sup> Harry McGee, “Minister of State Has Faced ‘Endless Lobbying’ over Upcoming Gambling Legislation,” *The Irish Times*, August 16, 2024, <https://www.irishtimes.com/politics/2024/08/16/minister-of-state-has-faced-endless-lobbying-over-upcoming-gambling-legislation/>

<sup>31</sup> Crystal Fulton, “The Information Needs of Individuals Affected by Harmful Gambling in Ireland,” *The International Journal of Information, Diversity, and Inclusion* 3, no. 3 (2019), <https://doi.org/10.33137/ijidi.v3i3.32962>

<sup>32</sup> Diarmad Ó Ceallaigh, Shane Timmons, Deirdre Robertson, and Pete Lunn, *Measures of Problem Gambling, Gambling Behaviours, and Perceptions of Gambling in Ireland*, ESRI Research Series 169 (Dublin: ESRI, 2023), <https://doi.org/10.26504/rs169>

<sup>33</sup> Deirdre Mongan et al., *Gambling in the Republic of Ireland: Results from the 2019-20 National Drug and Alcohol Survey (2022)*, <https://www.drugsandalcohol.ie/35305>

<sup>34</sup> Ó Ceallaigh et al., *Measures of Problem Gambling*.

<sup>35</sup> Ita Condrón, Suzi Lyons, and Anne Marie Carew, “Gambling in Ireland: Profile of Treatment Episodes from a National Treatment Reporting System,” *Irish Journal of Psychological Medicine* 41, no. 1 (March 2024): 94-101, <https://doi.org/10.1017/ipm.2022.20>

<sup>36</sup> *Launch of Gambling Disorder Position Paper*. CPSYCHI College of Psychiatrists, December 18, 2021. <https://irishpsychiatry.ie/blog/press-statement-launch-of-gambling-disorder-position-paper/>



Ireland has been depicted as the ‘wild west’ of the international gambling landscape because of recurring failures to update the country’s gambling legislation and for its comparative low taxes and levies on gambling.<sup>37</sup> With the acceleration in accessibility of online gambling products and services via digital platforms, Ireland’s regulatory and policy context has become increasingly out of date.

A Department of Justice and Equality report in 2019 described the Irish regulatory system as fragmented – and space here does not allow us to list all the bodies involved in monitoring licences, gathering levies, setting advertising guidelines, monitoring complaints and regulating the National Lottery.<sup>38</sup> However, the Gaming and Lotteries (Amendment Act 2019) did update the licensing of gaming machines and lotteries, set limits on stakes and prizes, and standardised the minimum age for gambling and gaming at 18 years. It did not however deal with online gambling or gambling marketing in any substantive manner.

The Gambling Regulation Bill (2022) in Ireland seeks to introduce limits to gambling marketing, including ‘the volume and frequency of gambling advertising during sporting event broadcasts’ and introduce an option for customers of on-demand services to opt out of receiving gambling advertising or from gambling operators.<sup>39</sup> The bill has yet to make its way through the upper house but a new Gambling Regulatory Authority of Ireland (GRAI) office has been established and a Chief Executive Officer (CEO) designated (Anne Marie Caulfield).<sup>40</sup>

The main part of the new legislation dealing with gambling advertising and marketing is detailed in Part Six, chapter one of the bill. As is the case for other parts of the bill, the text (Part six, chapter one, 138) specifies that the new Gambling Regulatory Authority of Ireland (GRAI) will have significant latitude in respect of shaping the nature of the rules to govern gambling advertising and marketing in the future. This includes the power to prohibit certain content in gambling advertisements, as well as prescribing the times, places and events at which advertisements can be displayed and the frequency with which such advertisements can be broadcast. Inducements and free bet offers, which research has shown can be particularly impactful on younger cohorts of the population, will be banned. In addition, adults will have to “actively opt in to receive betting advertisements and there will be a ban on social media advertising”.

The GRAI will also be able to call on “any expert research available to the authority in relation to factors that may increase or decrease excessive and compulsive gambling and the means to address such gambling”. There is a particular focus on protecting children from gambling advertising and this is threaded through the relevant sections of the bill. The legislation also demands that all advertising should be clearly identifiable as advertising a gambling activity. It outlines that a blocking facility should be clearly available for all on demand audio-video material or electronic communications. And it lays out specific penalties for infractions of the legislation, enforceable in the High Court. This includes up to 8 years imprisonment for the most serious offences.

The most important part of the provisions on advertising and marketing pertain to the prohibition of advertising during daytime – gambling advertising will be prohibited on all broadcast media between the hours of 05.30am to 21.00pm. The GRAI may (under section 145) apply to the High Court for a cease of business order, if it determines that a breach of the new code has been made. It is notable here that ‘relevant service providers’ means the audio visual on demand media platforms or social media services.

Section 146 also makes provision for the prohibition of branded clothing and merchandise. No branded material or merchandise intended to be worn by children can be displayed at a sporting event attended by children. The bill goes on to outline the meaning of such branding as including things like logos and brand symbols. Similar penalties for breach of obligations are provided.

In respect of gambling advertising on broadcast television, there was considerable lobbying by some sports representatives as well as gambling operators. The economic value of the Irish horse racing and breeding industry was estimated to be €2.46 billion in revenue in 2022 according to a report commissioned by Horse Racing Ireland.<sup>41</sup> Leading trainers such as Willie Mullins warned about the danger of losing the broadcast of Irish racing pictures from Racing TV if the legislation

---

<sup>37</sup> Apha Kerr, John O’ Brennan, and Lucia Vazquez Mendoza, *Gambling Trends, Harms and Responses: Ireland in an International Context. Final Report* (Maynooth University, 2021). <http://mural.maynoothuniversity.ie/14258/>

<sup>38</sup> Inter-Departmental Working Group on Future Licensing and Regulation of Gambling: Report to Government. Department of Justice and Equality, March 2019. <https://www.drugsandalcohol.ie/35278/>

<sup>39</sup> “Gambling Regulation Bill 2022,” Minister for Justice, last updated May 14, 2024, accessed September 10, 2024. <https://www.oireachtas.ie/en/bills/bill/2022/114/>

<sup>40</sup> McGee, “Minister of State Has Faced ‘Endless Lobbying.’”

<sup>41</sup> Horse Racing Ireland, *Social and Economic Impact of Irish Thoroughbred Breeding & Racing 2023* (Deloitte, 2023). Accessed September 10, 2024. <https://www.hri.ie/HRI/media/HRI/HRI-2023-Deloitte-Social-and-Economic-Impact-Report-FINAL.pdf>

progressed. Leading owner-trainer Barry Connell spoke of an “Armageddon” situation for Irish racing if the legislation went ahead, with a knock-on set of impacts on the economy and employment.<sup>42</sup> Both Racing TV and Sky Sports argued that the broadcast ban would render the broadcasting of Irish racing “unviable”.

Minister Browne criticised Horse Racing Ireland for entering into a new media rights deal (in May 2023, worth €47 million) with Racecourse Media Group and Sports Information Services, saying the contract was negotiated “long after the Dáil had set out its intentions” about including a ban on gambling advertising in the forthcoming legislation. The deal ensures that all live coverage of Irish horse racing will be delivered on Racing TV until 2029.<sup>43</sup>

The draft bill was changed in the summer of 2024 to exclude charities, including sports clubs from much of the application of the bill, specifically for prizes under €10,000. Further amendments were made to bingo regulations. Minister James Browne, however, refused to water down the provisions of the bill pertaining to “advertising, stake limits for slot machines or criminalising failure to protect children from gambling”.<sup>44</sup>

Finally, in Ireland advertising standards are governed by the Advertising Standards Agency of Ireland’s Code of Standards for Advertising and Marketing Communications in Ireland (ASAI) which includes a section on gambling.<sup>45</sup> Advertising and Marketing on broadcast and video on demand services established in Ireland, including public service broadcasters, are regulated by the newly constituted Coimisiún na Meán.<sup>46</sup> This body is also responsible for Ireland’s Online Safety Framework, including the protection of children from harm online.

Online safety is also managed at a platform level by different companies but significant new European legislation over the past two years has introduced more robust national and European oversight to digital platforms and services particularly in relation to children and young people. Coimisiún na Meán is the Digital Services Coordinator designated in Ireland.

## 5.2 Northern Ireland

Data from the most recent gambling prevalence survey revealed that Northern Ireland faces the largest percentage of gamblers who experience harm in the UK (2.3%), while the environment consists of 1 gaming machine per 300 people and 1 bookmakers office for every 6,750 people in Northern Ireland.<sup>47</sup>

Recent data on 11–16-year-olds in Northern Ireland raises concerns. Roberts revealed that overall gambling rates for children (gambling once in the previous 12 months) stand at 30% (N: 1,107 of 3690 respondents).<sup>48</sup> Overall gambling prevalence was significantly different on gender, economic background, and religion. Significant differences showed higher prevalence of gambling in boys than girls, for those who lived in areas of deprivation and those who did not, and from those from Catholic communities than those who were not.

Based on this number of children who had gambled in the past 12 months, 17% (N: 185) have gambled online in the previous 12 months, whilst 83% (N: 922) gambled offline. Offline types of gambling include playing fruit (amusement) machines (13%), playing cards for money (7%), buying lotto tickets and scratch cards (7%), playing Bingo for money (6%) placing a bet in a betting shop (5%), placing a private bet for money (5%) and any other gambling (4%).<sup>49</sup>

With specific relevance to our research, the survey revealed that in the past 12 months 15% (N: 163) of children had been encouraged to spend money because of gambling advertising. When analysed for differences between gender, economic background and religion, the only significant difference was on gender.<sup>50</sup>

For political purposes, Northern Ireland (NI) is governed by a devolved parliament (the NI Assembly, hereafter the Assembly) within the United Kingdom. Gambling regulation is governed by the Betting, Gaming, Lotteries and Amusements

---

<sup>42</sup> Conor Fennelly, “Leading trainer Barry Connell fears ‘Armageddon situation’ as a result of controversial Gambling Bill,” *Racing Post*, October 3, 2023. Accessed September 10, 2024, <https://www.racingpost.com/news/ireland/leading-trainer-barry-connell-fears-armageddon-situation-as-a-result-of-controversial-gambling-bill-aZz653p6TBup/>

<sup>43</sup> David Jennings, “Irish racing set to stay on Racing TV until at least 2029.” *Racing Post*, October 5, 2023. Accessed September 10, 2024, <https://www.racingpost.com/news/irish-racing-to-remain-behind-a-paywall-on-racing-tv-until-2029-at-the-earliest-ai8jF7MOBwU/>

<sup>44</sup> McGee, “Minister of State Has Faced ‘Endless Lobbying.’”

<sup>45</sup> “The Code - Code of Standards for Advertising and Marketing Communications in Ireland, 7th edition,” Advertising Standards Authority, accessed September 10, 2024, <https://adstandards.ie/asa-code/>

<sup>46</sup> Enriching Ireland’s Media Landscape,” Coimisiún na Meán, accessed September 10, 2024. <https://www.cnam.ie>

<sup>47</sup> “Northern Ireland Gambling Licensing and Industry Data – Quality Assurance of Administrative Data (QAAD),” Department for Communities, 2023, accessed September 10, 2024, <https://www.communities-ni.gov.uk/system/files/publications/communities/northern-ireland-gambling-licensing-industry-data-2022-quality-assurance-admin-data.pdf>

<sup>48</sup> Roberts, *Experience of Gambling by Young People*.

<sup>49</sup> Roberts, *Experience of Gambling by Young People*.

<sup>50</sup> Roberts, *Experience of Gambling by Young People*.

Northern Ireland Order 1985. This legislation is similar to, but distinct from the gambling laws in the rest of the United Kingdom, particularly the Gambling Act 2005 which does not apply to NI. The Department of Communities (formerly the Department for Social Development) is responsible for this legislation. Currently the Department of Health and the National Health Service (N.H.S) in Northern Ireland has no direct responsibility for specifically treating gambling-harm.

Not covered by Great Britain's Gambling Commission, Northern Ireland presents an interesting outlier in Europe as it has no independent gambling regulator. Enforcement of gambling licenses is the responsibility of the Police Service of Northern Ireland. Breaches of the license are therefore prosecuted through the Northern Ireland Courts and Tribunals Service.

In 2012 the Northern Ireland Executive agreed to the drafting of new legislation to modernise the law on gambling. No progress with this legislation was made before the NI Assembly election of 2016 nor before the Assembly was suspended between March 2017 and January 2020.

In response to the internationalisation of online gambling, amendments to the Gambling Act 2005 were applied to NI through the Gambling (Licensing and Advertising) Act 2014. Specifically, it outlines that it would be an offense for a foreign company to advertise remote gambling in NI if it was not licensed with the Gambling Commission. If this is breached, then section 333(4) states that;

*"A person guilty of an offence of advertising unlicensed remote gambling is liable on summary conviction to imprisonment for a term not exceeding 6 months, a fine not exceeding level 5 on the standard scale, or both."*

On the 26th of April 2022, the 1985 Order was amended to the Betting, Gaming, Lotteries and Amusements (Amendment) Act (Northern Ireland) 2022 (the '2022 Act'). This revision made three provisions, dubbed 'the most substantial changes to gambling law here in nearly 40 years'.<sup>51</sup>

- 1) The Act clarified a new offence around permitting an under 18 to play a gaming machine,
- 2) revised the definition of cheating making it an offence to either cheat or do anything to assist another person to cheat; and
- 3) provided the Department with the power to issue one or more Codes of Practice about the manner in which facilities for gambling are provided.

This Act was debatably 'substantial' but still constituted only a first step in a two-part strategy to revise an Act that predates the desktop computer, let alone the smartphone. Unfortunately, the failure of the Assembly to function between October 2022 and February 2024 led to further delays in a planned second phase of reform to the 2022 amendment.

Between December 2022 and January 2024, the Northern Ireland All Party Group on Reducing Harm Related to Gambling undertook an inquiry on public health approaches to tackling gambling-related harms in Northern Ireland. Taking testimony from many stakeholders in the gambling, public health, and communications sectors much evidence was gathered.

*"The overwhelming weight of evidence received by the APG shows that gambling is a significant public health issue and calls for a public health approach similar to that used in alcohol and tobacco. This is because, as with these other legal addictive products, the whole population is vulnerable to gambling addiction and harm"*

The resultant report identified 57 recommendations across 19 areas of reform. Relevant recommendations for gambling marketing in this jurisdiction include:

- Gambling should be officially recognised as a public health issue in Northern Ireland Policies should not just focus on individual-level gambling harms but should include population-based approaches that prioritise harm prevention, in line with the public health approach adopted for alcohol and tobacco.
- The APG recommends that phase two of gambling law reform in Northern Ireland emphasises the prevention of gambling harm first and foremost, as opposed to focusing solely on the treatment of gambling harm once it has already occurred.
- A levy on gambling operators in NI to fund research, prevention, and treatment, as provided for in the Betting, Gaming, Lotteries and Amusements (Amendment) Act (Northern Ireland) 2022, should be implemented without delay.
- Consideration should be given to a ban of gambling advertising in some form, based on the best practice and experiences of countries like the Netherlands, Switzerland, Belgium<sup>52</sup> and Iceland.

<sup>51</sup> "Gambling Reform Reaches Final Stage – Hargey." Department for Communities. March 8, 2022. Accessed September 10, 2024. <https://www.communities-ni.gov.uk/news/gambling-reform-reaches-final-stage-hargey>

<sup>52</sup> Bram Constandt and Steffi De Jans, "Insights into the Belgian Gambling Advertising Ban: The Need for a Comprehensive Public Policy Approach," *Health Promotion International* 39, no. 4 (August 2024). <https://doi.org/10.1093/heapro/daae116>



- The precautionary principle should be applied to advertising and marketing of gambling, and restrictions applied to the greatest possible extent.
- A watershed prohibiting the broadcast of gambling advertising on television and radio should be instituted between the hours of 5:30am and 9:00pm, as proposed in the Gambling Regulation Bill in the Republic of Ireland.
- An ‘opt-in’ feature should be introduced for social media gambling adverts similar to that proposed in the Gambling Regulation Bill in the Republic of Ireland.
- Promotions that encourage gambling through offers of free bets, credit and non-monetary incentives should be banned.

In Northern Ireland advertising standards are governed by the Advertising Standards Authority (ASA) and the Committee of Advertising Practice’s (CAP) UK Code of Non-broadcast Advertising and Direct and Promotional Marketing (CAP Code) and the UK Code of Broadcast Advertising (BCAP Code). The ASA, like the ASAI in Ireland, is an industry association that regulates its own members through these codes.

These codes list a range of ‘rules’ that prevent communications appealing to children and stress that harm and exploitation should be avoided. Essentially, advertisements should not possess ‘strong’ appeal to under-18s. Determining ‘strong’ appeal is the role of the regulator but the use of athletes who would be well known to under-18s has in the past been found to be in breach of the code.<sup>53</sup> Both codes operating in Northern Ireland permit complaints direct to the self-regulating agency. Changes to these codes would be required for the APG’s 2024 recommendations to be initiated.

At the launch of the APG report in June 2024, the new Minister for the Department of Communities, Gordon Lyons, commented that phase 2 reforms would not occur in the current sitting of the NI Assembly, but groundwork was being prepared, including a new gambling prevalence survey. It seems clear, however, that once the new gambling legislation is enacted in Dublin, Northern Ireland will lag far behind in respect of tackling gambling harms. It will also continue to be a laggard in the United Kingdom’s devolved context. The urgent need for legislation should compel the Northern Ireland Executive and Assembly to redouble its efforts to enact meaningful new legislation.

### 5.3 Gambling Marketing Policies in other Jurisdictions

Both the APG report of 2024 in Northern Ireland and the proposed Gambling legislation in Ireland (2022-4) both have the ambition to restrict gambling marketing. In our project we also considered how these developments compared to those emerging in other jurisdictions. In our view the Irish legislation, although very welcome, lacks the ambition of regulations recently introduced in Belgium and Italy.

For example, since 2022 limits have been placed on gambling in newsagents and other commercial outlets in Belgium. From 1 January 2025, all gambling advertising will be banned from sports stadiums, and from 1 January 2028, sponsorship of sports clubs/teams by gambling companies will be severely restricted. Although the gambling lobby and its allies predicted the “end of football in Belgium”, there seems to have been a relatively smooth adjustment during this transition process. Since July 2023 the age limit on any kind of gambling was raised to 21 years of age. The maximum weekly ceiling on individual gambling losses was reduced to €200 from €500. The most controversial part of this legislation though was the ban on advertising. Interestingly, Belgium reported a 16.7% rise in Gross Gambling Revenue (GGR) in 2023, despite the tougher regulatory controls.<sup>54</sup>

Italy has also moved ahead with significant legislation on gambling marketing. In 2019 a comprehensive ban on gambling marketing was introduced. Alongside traditional forms of marketing, commercial communications such as product placement, the distribution of branded items including competitions with branded products as prizes, advertorials and ‘influencer marketing’ were all banned. Serie A football clubs were banned from carrying betting advertising or branding on their club shirts (Spain’s La Liga followed suit, in advance of the 2021-22 season). The so-called ‘Dignity Decree’ in early 2019 prohibited all TV, radio, press and internet gambling marketing. This blanket ban was brought in after a study demonstrated that 3% of the Italian population was suffering from gambling harms.<sup>55</sup> This percentage is only slightly below the most recent estimate for Ireland.

<sup>53</sup> Advertising Standards Authority. *ASA Ruling on LC International Ltd t/a Ladbrokes*. 2022. Accessed September 9, 2024. <https://www.asa.org.uk/rulings/lc-international-ltd.html>

<sup>54</sup> Kyle Goldsmith, “Belgium reports 16.7% rise in 2023 GGR despite tighter regulatory controls,” IGB, August 12, 2024. Accessed September 10, 2024. <https://igamingbusiness.com/finance/belgium-gambling-ggr-regulatory-changes/>

<sup>55</sup> Luisa Mastrobattista et al., “Gambling Prevalence in Italy: Main Findings of an Epidemiological Study in the Italian School Population Aged 14-17 Years,” *Minerva Forensic Medicine* 141, no. 1 (March 2021): 2-12. <https://doi.org/10.23736/S2784-8922.21.01801-0>



## 6.0 Concluding remarks

This report examined the relationship between youth, gambling marketing and sport on the island of Ireland. It is very clear from our findings that the increase in gambling marketing and the proliferation of digital platforms and services has led to **significant increases in the exposure of young people across the island to gambling marketing messages** over the past decade. Our research confirms trends identified in other countries related to the strategic use of sport by gambling operators to target gamblers and non-gamblers to build brand awareness. Further it points to an extremely high level of youth gambling exposure to commercial gambling messages and references, without sufficient counterbalancing messages as to risks and harms.

It is clear to us that certain sports governing bodies and some media organisations are complicit in this trend, either through their actions or inactions. The delegation of responsibility for gambling regulation to national and regional authorities adds to the complexity of dealing with this issue. However, this provides no justification for the lack of urgency or action on behalf of governments and responsible agencies. **While many companies in the gambling industry are reaping considerable profits, sports, media, and governments are also benefitting financially** from the growth in gambling.

Despite these financial gains, neither Ireland nor Northern Ireland have adopted a public health approach to gambling and neither have introduced national programmes aimed at prevention, treatment and support of vulnerable groups and their communities. In our view **the gambling levy in Ireland is not set at a level that signals it is being used as a deterrent**. Further, any state gambling levy on gambling operators or on gambling behaviour should be used to support gambling prevention, treatment and research to counter gambling harms. In light of our findings, its use for any other purpose is difficult to defend.

**Emerging legislation needs to reflect the reality of contemporary gambling marketing practice.** Gambling shops, billboards and bus stop adverts still abound, but young people consume sport mainly through mass media (i.e. television) and social media on their mobile phones. Gambling operators engage in innovative marketing tactics that are reaching these young consumers and they are attempting to 'normalise' the link between gambling and sport. This includes both explicit and implicit forms of marketing, with celebrities and social media influencers used to enhance the allure of the gambling product being sold.

The young people in our focus groups (aged between 14 and 24 and on both sides of the border) were all sports fans and actively play sports. They demonstrated **very high recall of gambling brands**, and they also attested that, **of the gambling messages they received, almost all presented gambling in a positive light**. This suggests to us that "responsible gambling" communications and current public health messaging, where it exists, is very ineffective. Consequently, there is **a very poor understanding among young people of the risks** relating to gambling harms, particularly the shared or societal risks.

We firmly believe that sporting organisations and player representative bodies on the island of Ireland should **end their reliance on gambling marketing income**, including minimising the degree to which they display gambling marketing at all live sporting events. This can be enforced for those sports which receive state funding (directly and indirectly). Sports organisations which operate on an all-island basis could, and should, take the lead here, but we feel that all sporting bodies should be aware of their obligations in this regard and act accordingly.

We were particularly alarmed at the degree to which both public service and commercial media organisations are re-broadcasting gambling marketing in their programming, both in live and highlights programmes. This is in addition to pre, during and post advertising breaks and much of it is screened before 21.00. We would suggest that **professional media practice guidelines**, and programmes that aim to educate future media professionals, need to include information on the extent of individual and social gambling harms on the island of Ireland and **view gambling as a public health issue**.



They therefore need to adjust their professional guidelines and practices to minimise or eliminate gambling marketing from within programmes. Where such gambling marketing is carried, clearly legible gambling harm messaging needs to be communicated throughout longer programmes.

Online the issue will require a platform by platform but also a co-ordinated approach by agencies designated with managing online safety. There has been little discussion to date of gambling messaging and gambling mechanics included in online spaces as an online harm. **Gambling marketing and gambling mechanics which are included in non-gambling products need to be part of any discussions of child online safety and prospective harms.** Further, the harm done by saturation marketing to adults who are struggling with gambling addiction needs to be acknowledged.

Our findings suggest that the new GRAI will have a considerable task ahead in policing the regulations on marketing and all its associated practices and keeping them updated. To be effective, **gambling marketing regulation requires a cross departmental policy approach, encompassing justice, education, health and sports.** It also **requires an all-island approach**, given the Shared Island scope of many contemporary sporting organisations and the common broadcast environment on the island, and with our neighbours Great Britain. Institutional structures available to policymakers via the second strand of the Good Friday Agreement should be fully utilised in this effort to adopt a public health approach to gambling regulation across the island.

Finally, our project suggests **much more research is necessary.** Gambling research is a developing phenomenon in Ireland, and we know from international settings that data dates rapidly. What exists in the Irish context is currently very limited. Our research provides a unique cross border and cross media perspective but is limited in scale. We need more of this type of research if we are to understand the impacts of gambling marketing on the integrity of sport and the media, and perhaps more importantly on the attitude and behaviour of young people in these spheres.



# Sports Betting

Football Basketball Tennis Baseball Ice Hockey Cricket ...

TOP event

## FRA : ESP

20:00 2.05 19.10

PLACE BETS

Upcoming events

Manchester City : Madrid  
Madrid : Munich  
Dortmund : Sevilla  
Villarreal : Liverpool  
Paris : Sevilla  
Munich : Berlin  
Dortmund : Wolfsburg  
Duisburg : Ingolstadt  
Augsburg : Hertha

	1	2	3	4	5
Manchester City	7.0	3.5	2.4	1.8	1.5
Madrid	2.0	3.1	2.0	1.5	1.4
Dortmund	3.1	3.0	2.0	1.5	1.4
Villarreal	1.3	3.0	2.0	1.5	1.4
Paris	1.2	3.1	2.0	1.5	1.4
Munich	1.4	3.2	2.1	1.6	1.5
Dortmund	4.2	3.7	2.5	1.9	1.8
Duisburg	2.0	3.5	2.4	1.8	1.7
Augsburg	1.6	3.9	2.8	2.0	1.9

## **Code Red**

**Young People  
and their Exposure to  
Gambling Marketing  
through Media and  
Sport on the island  
of Ireland**