NEW SEASON, MORE SELF-REGULATION, **MORE MARKETING.**

The Prevalence of Gambling Adverts during the Opening Weekend of the English Premier League 2023/2024.

September 2023







DATA POLICY

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FUNDING

This report details the findings of a project which was carried out between the University of Bristol and ITN. The project was funded by the University of Bristol Business School, and Economic and Social Research Council Impact Acceleration Account funding awarded by the University of Bristol. Details and full declaration of interests of each of the authors can be found at the end of the document.

TECHNICAL APPENDIX

A technical appendix that includes the code books, full-table results and other technical information can be fund here: https://www.bristol.ac.uk/media-library/sites/busi-ness-school/documents/Technical%20Appendix.pdf

ACKNOWLEDGEMENTS

We extend our sincere gratitude to all contributors to this research project: Special thanks to Emily Crick and Vanessa Marshall for their invaluable feedback and support. Our dedicated research assistants, Ollie Tomson, James Topping, Harry Foster, Sid O'Neill, and Jaianta Selby, played a pivotal role with their commitment and diligence. We also appreciate the contributions of Jonathan Mitchell and Callum Matcalfe from ITN for their valuable input and unwavering support. Lastly, we acknowledge the University of Bristol Business School team, including Evarist Stoja, Corinna Booth, Christopher James, and Andrew Sturdy, for their continuous support.

Published by University of Bristol, 2023.
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1 EXECUTIVE SUMMARY

ABOUT THIS RESEARCH

This pioneering project offers an in-depth analysis of the prevalence of gambling advertisements during the English Premier League's opening weekend, spanning live televised coverage, sports news programming, sports news radio, and social media. The study encompasses four main areas:

- Live Televised Coverage Analysis: A frequency analysis of gambling marketing during live coverage of the opening weekend's Premier League fixtures in the UK, occurring from 11th to 14th August 2023.
- Sky Sports News Analysis: An assessment of gambling marketing frequency during Sky Sports News broadcasts on 12th August 2023, from 6 am to 9 pm.
- Talk Sport Radio Analysis: An examination of gambling marketing frequency during Talk Sport Radio broadcasts on 12th August 2023, spanning from 7:30 am to 9 pm.
- Social Media Analysis: An evaluation of gambling marketing disseminated by the UK's ten largest operators across Facebook, Instagram, and Twitter/X during 11th to 14th August 2023.

Using validated codebooks from prior research, our investigations comprised over 24 hours of match broadcasts, 15 hours of Sky Sports News coverage, 14 hours of TalkSport Radio broadcasts, and the scrutiny of gambling ads posted on social media platforms during the specified period.

IMPLICATIONS

The study's most compelling revelation is the overwhelming and inescapable nature of gambling messaging during the Premier League weekend. Across all media channels examined, we identified a staggering total of 10,999 gambling messages. This translates to an average of 2,750 messages per day or 115 messages every hour. Match broadcasts accounted for the majority, totalling 6,966 messages (63%), followed by Sky Sports News with 2,014 messages (18%), social media with 1,902 messages (17%), and TalkSport Radio with 117 messages (2%). Social media gambling ads during the weekend amounted over 30m impressions – highlighting its reach and importance.

Our research uncovered significant issues related to existing regulations, primarily self-regulation within the industry. Over 7,000 gambling messages were observed, mentioned, or posted across different media during the so-called "whistle-to-whistle ban." The majority of these messages were tied to match broadcasts, rendering the industry's self-imposed ban largely ineffective. Furthermore, our analysis indicates that the proposed front-of-shirt sponsorship ban, though announced by the Premier League, is unlikely to significantly reduce the frequency of gambling messages, as it fails to address the presence of logos on other locations such as pitchside hoardings, whilst clubs will still be allowed to carry logos on shirt-sleeves. Lastly, 92% of content marketing ads on social media were found to breach advertising regulations by not being clearly identifiable as advertising, representing a serious violation of consumer rights.

POLICY RECOMMENDATIONS

Legislation on Gambling Marketing during Matches.

Introduce legislation to comprehensively regulate gambling messages during football matches. The current industry-led whistle-to-whistle ban has been repeatedly shown to be ineffective. This legislation should encompass both the volume as well as the content of all messaging during matches, including hoardings and shirts, as well as radio, and social media.

Sponsorship Ban Clarity

Enact legislation that clearly bans sponsorship on football shirts. The proposed front-of-shirt ban is anticipated to have minimal impact on the prevalence of gambling logos during football matches.

Strengthen Social Media Advertising Regulations.

Clarify and strengthen regulations pertaining to social media content marketing. The significant proportion of ads (92%) lacking clear recognition as advertising poses a severe concern and necessitates immediate intervention.

HEADLINE FINDINGS

The study revealed that gambling messages saturated the media landscape during the Premier League weekend. From live match broadcasts to sports news programming, social media, and even radio, these messages were omnipresent and virtually unavoidable. The table below summarises the total number of gambling messages we recorded for each medium.

10,999

A TOTAL OF 10,999 GAMBLING MESSAGES.

A STAGGERING TOTAL OF 10,999
GAMBLING MESSAGES WERE
IDENTIFIED DURING THE WEEKEND
ACROSS VARIOUS MEDIA CHANNELS.
THIS HIGH FIGURE ILLUSTRATES
THE PERSISTENCE OF GAMBLING
MARKETING DURING THIS PERIOD.



6,966 GAMBLING MESSAGES DURING THE SIX MATCHES.



6,966

THE ANALYSIS OF SIX PREMIER LEAGUE MATCHES SHOWCASED THE DOMINANCE OF GAMBLING MESSAGING. WITHIN THIS LIMITED TIME FRAME, A TOTAL OF 6,966 GAMBLING MESSAGES WERE RECORDED DURING LIVE MATCH BROADCASTS.

ONLY 20.6% INCLUDED GAMBLING HARM REDUCTION MESSAGES.



20.6%

OUT OF THE 10,999 GAMBLING MESSAGES, ONLY 20.6% INCLUDED GAMBLING HARM REDUCTION MESSAGES (E.G., BEGAMBLEAWARE), AND ONLY 18.7% FEATURED AGE WARNINGS, LEAVING THE MAJORITY WITHOUT ANY WARNINGS. ONE

ANALYSIS OF TALKSPORT RADIO PROGRAMMING FOUND THAT AT LEAST **ONE** GAMBLING ADVERTISEMENT WAS PRESENT DURING ANY COMMERCIAL BREAK, DEMONSTRATING THE CONTINUOUS PROMOTION OF GAMBLING ON THIS PLATFORM.

AT LEAST ONE GAMBLING AD DURING ANY COMMERCIAL BREAK ON TALKSPORT RADIO.



600

DURING A SINGLE 2-HOUR SEGMENT OF SKY SPORTS NEWS, 600 GAMBLING MESSAGES WERE SHOWN. THIS ACCENTUATES THE PREVALENCE OF GAMBLING MARKETING BEYOND LIVE SPORTS BROADCAST, FURTHER CONTRIBUTING TO THE SATURATION OF GAMBLING MARKETING IN THE GENERAL MEDIA LANDSCAPE.

600 GAMBLING MESSAGES DURING TWO HOURS OF SKY SPORTS NEWS.



1,902 GAMBLING ADS ON SOCIAL MEDIA.



1,902

A REVIEW OF SOCIAL MEDIA
PLATFORMS DURING THE PREMIER
LEAGUE WEEKEND IDENTIFIED 1,902
GAMBLING ADS. SOCIAL MEDIA
EMERGED AS A KEY CHANNEL FOR
GAMBLING MARKETING DURING
THE PREMIER LEAGUE WEEKEND,
AMPLIFYING ITS REACH AND IMPACT.

34 MILLION IMPRESSIONS ON SOCIAL MEDIA.



34**M**

THE RECORDED SOCIAL MEDIA
GAMBLING ADS GENERATED
A REMARKABLE **34 MILLION**IMPRESSIONS (I.E. HOW MANY TIMES
AN AD HAS BEEN SEEN). THIS DATA
HIGHLIGHTS THE SUBSTANTIAL
INFLUENCE AND EFFECTIVENESS
OF SOCIAL MEDIA AS A PLATFORM
FOR GAMBLING ADVERTISING.

92%

OUT OF 391 CONTENT MARKETING
ADS SENT BY MAJOR GAMBLING
BRANDS, 92% WERE NOT CLEARLY
IDENTIFIABLE AS ADVERTISING –
AND THEREFORE BREACHING A KEY
ADVERTISING REGULATION.

92% OF CONTENT MARKETING ADS BREACH ADVERTISING REGULATIONS.



2 BACKGROUND

The English Premier League (EPL) benefits from significant engagement with its audience. Research commissioned by the EPL found in the 2019/2020 season that cumulative global viewership totalled 3.26 billion (EY, 2022). Football matches televised on Sky in the UK attract an average viewership of 1.2 million viewers (Sky Sports, 2021), although bigger fixtures can attract a significantly larger viewership. Sky also announced record viewership for the opening weekend of the season, with eight million viewers watching the first five matches (Miller, 2023). This significant viewership ensures that the EPL is an ideal partner for businesses or industries seeking to advertise their products to a large audience. The gambling industry has developed a significant presence within English professional football during recent years, both within the EPL and within the English Football League. the latter of which retains a gambling operator as its primary sponsor. Sponsorship of EPL clubs by the gambling industry can take many forms. Seven teams in the EPL have retained gambling operators as their sponsors for the 2023/2024 season, with teams generally receiving between £7 million and £10 million of revenue as a result (Sigsworth, 2023). Clubs within the EPL also benefit from the revenues derived from elsewhere during EPL football broadcasts, with marketing shown in numerous areas including pitchside, as part of the structure of stadia, or during commercial advertising.

This study seeks to extend existing research by capturing the number of gambling advertisements across the opening weekend of the English Premier League of August 2023 across four different media contexts (televised coverage of live matches, Sky Sports News coverage, radio coverage, and social media) to demonstrate exposure of gambling marketing particularly to sports fans. The findings of this research are also used to evaluate the efficacy of the whistle-to-whistle ban, the front-of-shirt ban, as well as the ongoing consultations as a result of the White Paper into the reform of the Gambling Act 2005 (Department for Culture, Media & Sport, 2023).

The research base which has explored the prevalence of gambling sponsorship within televised football has grown in recent years (Cassidy and

Ovenden, 2017; Purves et al., 2020; Ireland, 2021; Sharman et al., 2023; Torrance et al., 2023). Research has highlighted how gambling advertising is prominent in a wide range of locations such as on players shirts, on pitchside hoardings, during commercial adverts, on football stadia itself. Other research has also raised concerns around the vulnerability of children and young people due to exposure to gambling through sponsorship (Bunn et al., 2019). The growing prevalence of advertising has been addressed through self-regulation by the gambling industry and the EPL itself. Operators within the UK - now represented by the Betting and Gaming Council - announced a whistle-towhistle ban in 2019 through the Industry Group for Responsible Gambling (2019) code, removing their televised commercial adverts from five minutes before the match to five minutes after the match. before the 9pm watershed. Additionally, the EPL recently announced that its clubs will voluntarily remove gambling sponsors from the front of shirts in 2026 (Premier League, 2023). However, as the growing research base as shown, neither the whistle-to-whistle ban nor the front-of-shirt ban will address advertising found elsewhere, such as on pitchside hoardings.

There is a need to consider the interaction between gambling marketing, football-related coverage and the viewer during periods of the weekend when live football cannot be shown. Importantly, the English Football Association (FA) applies Article 48 of the UEFA statutes, prohibiting the transmission of live football during given periods of the weekend (UEFA, 2022). This period is maintained in England during Saturday afternoons where matches normally kickoff at 3pm. This has been maintained in England (and Scotland) to ensure continued in-person attendance at matches taking place on Saturday afternoons. Viewers in the UK still wishing to watch televised-based coverage of Saturday afternoon football therefore may opt to watch programmes which provide updates and highlights from matches as they are taking place. In addition to its televised coverage of live matches outside of the nontransmission period. Sky Sports provides rolling coverage, updates and highlights of matches on its sports news channel, Sky Sports News. According

to BARB (2023) data, Sky Sports News has a monthly reach of 5 million viewers. Additionally, as opposed to programming which is provided free-to-air by the BBC, Sky Sports News also deploys commercial breaks as part of its coverage. Its ability to show highlights as well as commercial breaks represents further opportunities for exposure to gambling-related marketing, whether from excerpts of football coverage itself or through commercial adverts.

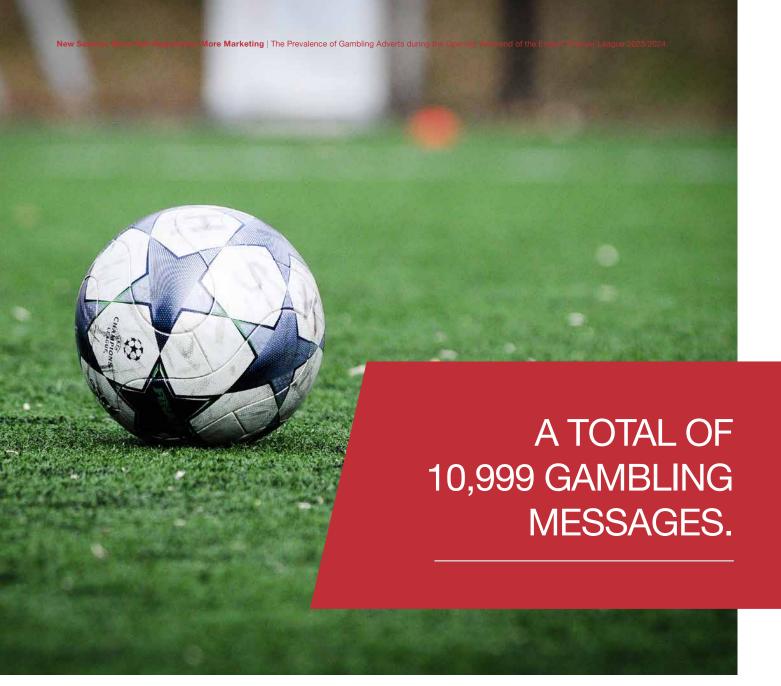
This report also explores the interaction between gambling adverts, the EPL and social media. Social media is a valuable tool for gambling operators to engage with football fans and increase brand awareness (Houghton, et al., 2019). Most people use social media in their daily lives and sport consumption commonly takes place through mobile devices and is second nature for younger people (James & Bradley, 2021; Yim et al 2021). From checking scores, to purchasing tickets online and using e-tickets to enter events, to following their favourite teams, and engaging with other fans, sports fans are more likely to be engaging with their mobile devices throughout a sports event, whether tuning in from home or attending a live event. Sports fans are therefore more likely to be engaging in social commerce, and social media plays a key role in consumer decision making (Yim et al, 2021). The increased accessibility of sports betting through mobile devices means that individuals may be easily persuaded to engage with gambling apps if they are nudged to do so whilst browsing social media on their smartphone. Previous research has explored the frequency to which gambling operators promote their brand via Twitter (James and Bradley, 2019; Killick and Griffiths, 2020). Existing research has also found that gambling advertising on social media rarely incorporates responsible gambling messaging (Hing et al., 2015; Houghton, 2019; Killick & Griffiths, 2020; James & Bradley, 2021). While the whistle-to-whistle ban may be in place to reduce exposure to gambling marketing during matches for televised sport, young people can still be exposed to gambling advertisement through sports events via social media.

Finally, this report explores the prevalence of gambling marketing on radio. Live matches from the

EPL may be broadcast over stations hosted either by the BBC – a public broadcaster which does not carry advertising – and Talksport, a commercial broadcaster which does broadcast advertising. The inclusion of radio is important as – whilst there would not be any visual representations of gambling marketing – radio is exempt from the BGC's whistle-to-whistle ban which itself covers only TV-related material. The prevalence of gambling-related marketing on the radio runs counter to intentions which seek to prevent gambling harms amongst those listening to EPL coverage.

This report is structured in accordance with the four research activities which, when completed together, give a holistic picture of the prevalence of gambling marketing during the opening weekend of the season. Firstly, we introduce the overarching aims of the study. Secondly, it details the methodologies followed for each of these aims, briefly outlining the research design for each aim as well as the nature of the codebooks, and the samples of coverage. Thirdly, it explains the findings of each aim, highlighting the frequency and format of adverts within the various research aims. Finally, the report brings these individual findings together within the discussion, highlighting the total number of gambling adverts across the weekend, in addition to policy implications which may be considered in light of the findings.





3 | **AIMS**

This research aims to conduct an in-depth analysis of the prevalence of gambling marketing during the English Premier League's opening weekend between the 11th and 14th August 2023, spanning live televised coverage, sports news programming, sports news radio, and social media.

1

To measure the prevalence of gambling marketing on sports related media during the opening weekend of the Premier League 2

To assess the current regulatory environment relating to gambling marketing and football, such as the whistle-to-whistle ban, front-of-shirt sponsorship ban, and social media advertising regulations.

3

To explore the extent to which gambling and football are interdependent, resulting in the normalisation of gambling through marketing during high profile football events.

These aims will be achieved through conducting a frequency analysis across four different contexts, including six match broadcasts, 15 hours of Sky Sports News, 14 hours of TalkSport Radio, and three social media platforms. Details of the methods used to meet these aims are outlined in the following section.

4 | METHOD

4.1 FOOTBALL MATCHES

Our research design was inspired by previous examples of frequency analyses of marketing within sports carried out previously. Previous research has explored the frequency of alcohol-related marketing during the UEFA Euro 2016 (Purves et al., 2017), the prevalence of gambling marketing across a variety of different sporting events (Purves et al., 2020), and across 10 games at various points of the English Premier League season (Torrance et al., 2023). Our methodology was a frequency analysis of gambling marketing which appeared during the live broadcast of six English Premier League matches which took place during the opening weekend of the 2023/2024 season. These matches took place between the 11th and 14th of August 2023. The coverage of these matches also included the pre-match, half time, and post-match studio discussions, as well as televised commercial breaks, in order to account for exposures which may occur towards audiences who were engaged for the entirety of the match coverage.

The sample of matches, and the relevant broadcasts, are introduced in Table 1. Five of the six matches were broadcast by Sky Sports, whilst the other was broadcast by TNT Sports. These reflect the usual broadcasting slots of UK-based transmissions of EPL matches, with Sky Sports hosting matches on Friday evenings, Saturday evenings, and all day on Sunday. Four of the matches featured teams whose kits presented gambling sponsors either on the front-of-

shirts (Burnley, Aston Villa, Brentford) or on the sleeves (Wolverhampton Wanderers). Nottingham Forest announced their shirt sponsorship with a gambling operator at the end of August 2023, after the first weekend of the season had taken place. The total length of footage analysed across the six matches amounted to 24 hours, seven minutes and 42 seconds of televised coverage, including pre-game and postgame discussions.

To record the frequencies of gambling messaging during broadcasts, we adopted the codebook from Purves et al.'s (2020) study, coding the marketing prevalent according to specific variables specific to the match coverage itself. The variables were wide-ranging, for example covering the time of the frequency in relation to the footage being broadcast, the location and format of the advertising, any references to websites or social media which may initiate gambling, and the presence of harm reduction or age restriction messaging. The full definitions of codes are introduced in the technical appendix.

Each frequency of marketing which occurred across different brands or across different media were coded individually. For example, if marketing simultaneously appeared on players' shirts as well as pitchside, then these two occurrences were coded separately. This approach was taken to develop a specific analysis of the presence across modalities, and according

Table 1: Sample of live televised matches.

матсн	Date and (local) time	Broadcaster	Length of Footage Analysed (inc. pre and post-discussions)
Burnley v Manchester City	11 August 2023, 20:00	Sky Sports	261 mins, 16 sec
Arsenal v Nottingham Forest	12 August 2023, 12:30	TNT Sports	298 mins, 8 sec
Newcastle United v Aston Villa	12 August 2023, 17:30	Sky Sports	211 mins, 45 sec
Brentford v Tottenham Hotspur	13 August 2023, 14:00	Sky Sports	188 mins, 39 sec
Chelsea v Liverpool	13 August 2023, 16:30	Sky Sports	209 mins, 37 sec
Manchester United v Wolverhampton Wanderers	14 August 2023, 20:00	Sky Sports	278 mins, 17 sec
TOTAL			1,448 mins (24.1 h)

From left to right, an example of how marketing may be captured when it enters, leaves, and then returns to camera shot. Note on the left the appearance of *Betfred* around the pitchside marketing which is coded as ending when the camera pans to the goalkeeper (middle shot). The *Betfred* marketing then reappears again (during the third shot), triggering a new frequency to be logged.

to different brands. Each marketing frequency was covered per shot. For example, if the camera captured marketing which was interrupted by breaking away to a different shot of a player, then the marketing would be recorded twice based on the marketing appearing twice. An example of how these shots were recorded is demonstrated in Figure 1. The codebook also gathered the maximum number of identical references covered per shot, thus allowing the maximum total number of logos which were exposed to televised audiences at any one point (see Purves et al., 2020). The codebook also deployed specific variables related to commercial breaks, establishing the number of gambling adverts per break. This was a code explored across each aspect of the study to compare the number of adverts per commercial break within the various elements of coverage.

Research assistants were hired to help the main research team in coding each instance of gambling advertising. The research assistants were trained before the start of the project. They received training on the context of the research, the variables and definitions within each codebook, and given examples of how different types of marketing should be recorded. The codebook - which was developed prior to the employment of the research assistants - was then tested by the research assistants on 20 minutes (roughly equivalent to 10% of a recorded football match included added time) of previously recorded football coverage before the coding of the Premier League coverage itself. This exercise was to test the codebook, to test intercoder reliability, and discuss differences in coding. Any differences were discussed amongst the research team and research assistants before the main data collection task commenced.

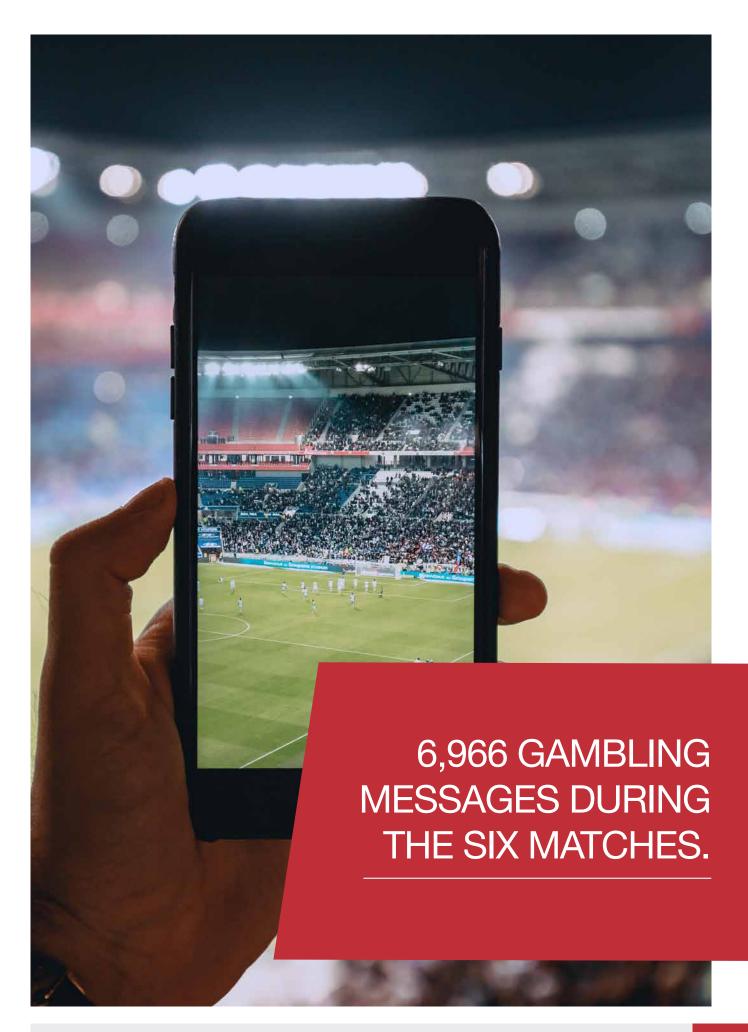
Data collection took place between the 14th and 18th August 2023, and was carried out by a research team at the University of Bristol. Footage

of each match was provided by ITN. As the data was publicly available and the research involved no human participants, ethics approval was not required. The materials were coded according to the variables detailed in the Technical Appendix in workbook spreadsheets designed by the research team in Microsoft Excel. Each individual frequency were coded according to the time of video at which the advert occurred. Collected data were analysed in SPSS, with outputs detailing the frequency of adverts, as well as the analysis of marketing according to the variables under study. We used Krippendorff's alpha to calculate the inter-reliability between coders, which ranged from 0.78 to 0.92, confirming high consistency across different coders.

4.2 SKY SPORTS NEWS

The match codebook outlined above was adapted to capture gambling marketing during the Sky Sports News coverage with some key changes. The Sky Sports News codebook differed in that it included accounting for whether the gambling marketing was within the news programme content, match highlights, or outside of the news programme, such as lead in or advertisement breaks. Other differences included noting whether gambling marketing references were made within the television studio or by reporters at a location such as outside a football stadium, and whether gambling marketing references were made to sports other than football in the news coverage. The total news coverage analysed consisted of 15 hours of Sky Sports News coverage from 6am – 9pm on Saturday 12th August 2023, including the Soccer Saturday segment. Data was gathered using recordings from the coverage and analysed by two research assistants between 14th and 18th August 2023.

The coders consisted of two male research assistants. Both coders were football fans and



therefore would have engaged with some of the content they were exposed as part of the data collection, and thus, were not exposed to significantly more gambling marketing than they otherwise would have been. Both coders were trained in advance of the analysis and analysed 20 minutes of the same content to ensure inter-coder reliability. Again, we used Krippendorff's alpha to calculate the inter-reliability between coders, which ranged from 0.68 to 1.0, confirming acceptable consistency across different coders.

4.3 TALK SPORT RADIO

The codebook used for the news coverage was adapted further and utilised to capture radio content for Talk Sport. Differences in this codebook included adapting the format to capture whether the references were made by a commentator (during the match), studio discussion, advertisement break, or other. The same two coders who conducted the news coverage analysis also conducted the radio content analysis and 20 minutes of the coverage was again coded by both coders to ensure intercoder reliability. Data was gathered from Talk Sport coverage between 07.30 - 21.00 on Saturday 12th August 2023. This radio station was selected as it is an official broadcaster of sporting content such as the Premier league and English Football League and broadcasts live commentary of every Premier League match. Therefore, football fans are likely to engage with this radio station during the opening weekend of the Premier league, and this helps to provide a holistic picture of the exposure of gambling marketing to football fans during the opening weekend of the Premier league. The coding was conducted by the same two research assistants that also analysed the Sky Sports News data. Both coders were trained in advance of the analysis and analysed 20 minutes of the same content to ensure inter-coder reliability. The full codebook is available in the technical appendix.

4.4 SOCIAL MEDIA

For social media ads, we employed a content analysis methodology, building upon the approaches of prior researchers such as Houghton et al. (2019) or Rossi et al. (2021), to examine the volume and content of gambling advertisements on social media. While earlier investigations primarily focused on organic advertising, our study encompasses both paid-for and organic social media advertisements. Paid-for advertising facilitates precise consumer targeting based on

demographics and shared information, with the reach of these ads predominantly being determined by ad spend. On the other hand, organic advertising relies on compelling content that individuals are motivated to share within their networks. Unlike paid-for ads, the reach of organic advertising is contingent upon a brand's follower count and the frequency of post "shares" or "retweets," metrics that necessitate creative content generation (Rossi & Nairn, 2022).

In addition to this, our research delves into both content marketing and conventional advertising techniques. Content marketing aims to engage current and potential consumer bases through content that may not be directly related to the promoted product or brand. This approach has emerged as a prominent form of organic advertising since the inception of social media and is extensively utilized by gambling brands. In contrast, conventional advertising often emphasizes financial incentives and attractive odds designed to prompt immediate gambling actions. These advertisements typically exhibit a strong link between sports and gambling. In summary, our study examines both paid-for and organic ads, encompassing content marketing as well as conventional advertising techniques.

For paid-for gambling ads, our data collection focused on the ten largest social media profiles among GB-licensed gambling accounts: Bet365, Betfred, Betfair, BetVictor, Coral, Ladbrokes, PaddyPower, SkyBet, and William Hill (see Table 2 for further details). These accounts collectively boasted a total of 10,535,200 followers, underscoring their extensive reach. Following the methodology of the Behavioural Insights Team (2023), we utilized the Meta Ad Library, a database that shows ads from brands currently running paid-for campaigns on Instagram and/or Facebook. Between August 4th and August 14th, we conducted daily checks of these ten accounts, recording the number of active ads and capturing screenshots.

Regarding organic gambling ads, we aligned our approach with prior research in gambling marketing (Houghton et al., 2019, Rossi et al., 2021) and focused on Twitter/X. We recorded and analysed all ads posted by the aforementioned ten gambling accounts during 11th to August 14th (i.e., the Premier League weekend). We also documented the amount of posts in the week leading up to the Premier League weekend to be able to identify whether the volume increases during the match days.



Prior to commencing the project, all research assistants underwent comprehensive training, which encompassed the research context, variables, and definitions outlined in the codebook. Numerous exemplar ads were provided to illustrate coding distinctions. Our codebook was developed based on the work of researchers such as Rossi and Houghton, with minor adaptations. In two dedicated sessions, the codebooks were collaboratively reviewed by the team using various sample ads for joint coding. Subsequently, the research assistants conducted a trial coding exercise involving 50 ads to ensure inter-coder reliability. The coding for social media ads was undertaken by three male research assistants. Inter-coder reliability was computed, yielding a Krippendorffs alpha ranging from 0.75 to 0.97, confirming high consistency across different coders. Discrepancies were discussed among the research team and assistants before embarking on the primary data collection phase, which took place between August 14th and August 18th, 2023. The collected data were then subjected to inter-coder reliability assessment using SPSS.

Table 2: Summary of accounts that were investigate in this research, including their followers on Twitter/X, Instagram, and Facebook.

BRAND	Twitter/ X Followers	Instagram Followers	Facebook Followers	Total Followers
Bet365	470,000	NA	1,900,000	2,370,000
Paddy Power	701,000	NA	1,600,000	2,301,000
SkyBet	418,000	75,200	837,500	1,330,700
Unibet	132,000	29,300	937,000	1,098,300
William Hill	242,000	31,000	700,000	973,000
Betfair	161,000	12,400	638,000	811,400
Coral	310,000	7,400	303,000	620,400
Ladbrokes	195,000	13,300	342,000	550,300
Betfred	108,000	5,400	196,000	309,400
BetVictor	115,000	7,300	48,400	170,700
TOTAL	2,852,000	181,300	7,501,900	10,535,200



The 10 big UK gambling brands have over 10 millions followers on social media

5 | **RESULTS**

The primary aim of this project was to examine the extent of gambling marketing throughout the opening weekend of the English Premier League, encompassing live televised matches, sports news programs, sports news radio, and social media platforms. To address this objective comprehensively, our analysis spanned over 24 hours of Premier League match coverage, 15 hours of Sky Sports News programming, 14 hours of Talk Sport Radio, and scrutiny of the ten largest GB betting accounts on social media. Our findings reveal that during this inaugural Premier League weekend, a total of 10,999 gambling-related messages were disseminated. For broadcasts (match, radio and news) each logo, or mention of the brand was counted as one gambling message, whereas for social media each ad was counted as one. The distribution of these messages across various broadcasting formats is detailed in Table 3.

Table 3: Summary of all gambling messages found during the coverage of the first Premier League Season weekend from 11th – 14th August 2023.

FORMAT	Date	Total time analysed	Average gambling Message per hour	No of Gambling Messages
Match Broadcasts	11 - 14 August	24h	289	6,966
Sky Sports News	12 August	15h	134	2,014
Talk Sport Radio	12 August	14h	7	117
Social Media	11 - 14 August	96h	20	1,902
TOTAL				10,999

In the following sections, we will dig deeper into each of these four settings, starting with match broadcasts.

5.1 FOOTBALL MATCHES

The coding of football match broadcasts found a total of 6,966 identical gambling messages during the 24 hours of coverage analysed, coded across a total of 1,163 separate frequencies. This translated into an average of 289 gambling messages per broadcast hour, or 4.82 identical gambling references per minute. Data summarising the most frequent code from selected variables are introduced in Table 4 below, with full results provided in the technical appendix. Matches with the highest number of identical frequencies per minute included teams whose principal sponsors were gambling operators (specifically Burnley and Aston Villa), as well as within the match featuring Wolves whose sleeve was sponsored by an operator. Identical gambling references occurred most frequently within the Burnley match, with an average of 11.15 gambling references occurring every broadcast minute. The Burnley match contained 2,913 identical references from startto-end of broadcast, whilst the match between Newcastle United and Aston Villa contained 1.322

identical references. The total number of identical references within these two matches accounted for 60.8% of the total number of identical references across the entire sample of live broadcast matches.

Gambling messages were shown most frequently during the sporting coverage within all six football matches, with 67.2% of frequencies logged during the action across the sample. Only 3.45% of gambling message frequencies were logged as occurring during commercial breaks. The average (mean) length of time for each gambling message frequency across the entire sample was 12.932 seconds. The most frequent type of advertising frequency was visual (84.8%) across the sample. This level varied across the matches, but was lower within matches with lower levels of pitchside and shirt-based marketing such as the Chelsea (60%) and Arsenal matches (60.5%). These two matches would have had a greater proportion of adverts formed by televised adverts which would have been coded as both verbal and visual. Nonetheless, matches which contained shirt-front sponsorships presented a higher level of visual marketing,

specifically the Brentford (94.3%), Newcastle (93.3%), and Burnley (87.7%) matches. Most adverts across the sample of matches – 95% - contained the logos or brand names of gambling operators. These findings highlight how operators seek to familiarise viewers of the Premier League with their brand through visual representations which appear continuously during the entire broadcast.

The most frequent location of identical references occurred on the full coverage of electronic pitchside hoardings, accounting for 3,877 – or 55.80% - of identical references across the sample of six matches.

These were most prevalent during the match between Burnley and Man City, where logos on pitchside hoardings accounted for 77.82% of identical references during that game, as well as between Newcastle and Aston Villa, where similar coverage accounted for 56.96% of identical references during the match. Despite advertising breaks accounting for approximately 3% of all gambling message frequencies, the second most common format of identical references during the sample of live matches occurred on sponsorship lead-ins, where a gambling sponsor -Bet365 – was introduced as sponsors of live coverage before or after advertising breaks, as demonstrated in Figure 2. It should be noted that sponsorship lead-ins did not occur during the periods covered by whistle-to-whistle bans. Logos appearing during the sponsorship lead-ins accounted for 1,662 identical references (23.86%) during the sample of live matches. The reason that this number was high was due to the sponsorship lead-ins' showing of around 29 separate Bet365 logos per presentation. These logos during sponsorship lead-ins provided a higher proportion of identical references during matches where identical references were less common in other locations, particularly within the Arsenal match (97.76%), the Chelsea match (69.88%), and the Man Utd match (58.73%). The third most common format of identical references was that of commercial breaks (10.68%), where again the presentation of numerous logos before or after the actual match - outside of the whistle-towhistle ban meant that gambling operator logos could appear within normal adverts.

Importantly, only 632 (9.07%) identical references appeared on players' shirts during the live six matches. The actual level of shirt-based references differed between matches. During the Burnley match, where



the home team's principal sponsor was W88, shirt-based logos accounted for 5.97% of total references, compared to the Brentford match, where just under a quarter (24.87%) of

references appeared on players' shirts. Shirt-based references were also relatively low during the match between Newcastle and Aston Villa, the latter of which wore shirts sponsored by BK8. References upon players' shirts made just 13.84% of identical references during the Newcastle match. Shirtbased references within the Man Utd and Wolves match amounted to 10.00% of total references, with Wolves wearing 6686 upon the sleeve of players' shirts. Whilst there were fewer shirtbased references during Man Utd-Wolves match than other matches with teams with shirt-front sponsorship, there was still a greater amount of gambling marketing during the sponsorship leadins of the match coverage, and across electronic, pitchside hoardings. These findings therefore highlight the inefficacy of the forthcoming removal of logos from the front-of-shirts, not only resulting in the possible visibility of logos elsewhere on players' kits, but also due to the remaining appearance of sponsorship elsewhere.

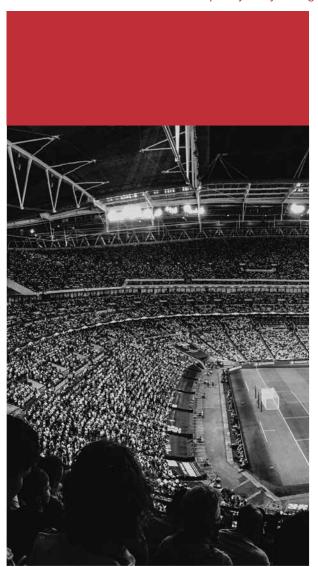
The most common brand represented through identical references was that of Bet365, partly due to the significant exposure of its logo during sponsorship lead-ins and across electronic, pitchside hoardings. The Bet365 logo was identified 2,637 times during the broadcasts of the six live matches, amounting to 37.86% of all maximum identical references. The second most common brand was W88 (11.71%) which encountered the most exposure upon pitchside hoardings and upon players' shirts during the match between Burnley

and Man City. Betway was the third most prominent brand, amounting to 11.50% of identical references during the live coverage of the six broadcast matches. The full list of brands identified during the six matches is introduced in the technical appendix. Notably, despite the BGC introducing the whistle-to-whistle ban to reduce exposure of gambling adverts to children and other vulnerable groups, 60.09% of the maximum identical references where were identified were represented by BGC members.

On average across the six matches analysed, 14.5% of individual frequencies contained harm reduction messaging. Such harm reduction messaging included examples such as "BeGambleAware.org" during televised adverts, or pitchside adverts which promoted specific safer gambling behaviours. Such messages did not

advise of the risk of engaging with gambling, but rather sought to make potential gamblers aware of the tools or specific behaviours which would be highlighted as more responsible. The number of gambling marketing frequencies with age restriction messages were also low. Only 11.1% of gambling related adverts contained age restriction messaging. Age restriction messages and harm reduction messages were most common during the coverage of the match between Arsenal and Nottingham Forest, where the highest number of gambling messages occurred during sponsorship lead-ins. Nonetheless, the lack of harm reduction or age messaging within gambling adverts across the sample of six matches is notable, with the lack of these forms of messaging allowing the possibility that gambling may be normalised for younger audiences whilst watching football.

Table 4: Selected results from the frequency analysis of gambling marketing during the televised Premier League matches.



BRAND	Burnley v Man City	Arsenal v Notts Forest
Number of individual gambling frequencies*	336	43
Number of identical references**	2,913	535
Most common format (by identical references)	Electronic pitchside hoardings (2267) Commercial break (420) Players shirt (174)	Sponsorship lead-in (523)
Identical references per broadcast minute	11.15	0.14
Most common brand (identical reference)	Bet365 (993) W88 (800) Betway (591)	Bet365 (524)
Type of marketing (individual frequency) (%)	Visual (87.8%)	Visual (60.5%)
Average duration of gambling message (seconds)	15.22s	10.00s
Type of gambling advertised (individual frequency) (%)	Logo only (69.6%)	Sports betting (60.5%)
Gambling messages with harm reduction messages (individual frequency) (%)	21.4%	60.5%
Gambling message with age restriction (individual frequency) (%)	11.9%	60.5%

^{*} Individual gambling frequency refers to each instance of gambling marketing logged in the codebook.

^{**} Identical references refer to the maximum number of identical logos or messages visible per frequency.





Only 11.1% of gambling related adverts contained age restriction messaging.

Newcastle v Aston Villa	Brentford v Spurs	Chelsea v Liverpool	Man Utd v Wolves	Total
342	245	55	142	1,163
1,322	991	415	790	6,966
Electronic pitchside hoardings (753) Static advertising (259) Sponsorship lead-in (183)	Players shirt (248) Sponsorship lead-in (174)	Sponsorship lead-In (290) Electronic pitchside hoardings (89)	Sponsorship lead-in (464) Electronic pitchside hoardings (222) Players shirt (79)	Electronic pitchside hoardings (3,877) Sponsorship lead-In (1,662) Commercial break (744)
6.24	5.28	0.26	2.84	4.82
Fun88 (566) Sportsbet.io (236) LeoVegas (202)	Hollywood Bets (589) Betway (206) Bet365 (185)	Bet365 (291) Parimatch (118)	Bet365 (465) Betfred (218) 6686 (79)	Bet365 (2,637) W88 (816) Betway (801)
Visual (93.3%)	Visual (94.3%)	Visual (60%)	Visual (73.2%)	Visual (84.8%)
16.87s	7.47s	16.43s	6.28s	12.93s
Logo only (92.4%)	Logo only (94.3%)	Sports betting (83.6%)	Logo only (73.2%)	Logo only (76.6%)
11.1%	5.7%	40%	28.2%	14.5%
9.1%	5.7%	40%	28.2%	11.1%



5.2 SKY SPORTS NEWS

Our analysis of gambling marketing during Sky Sports News coverage revealed a total of 2,014 gambling messages during the 15 hours of broadcast we examined. Table 5 highlights significant trends and patterns that shed light on the prevalence and exposure of such ads, even in the context of match highlights and the whistle-to-whistle ban.

Firstly, a substantial proportion of gambling messages were observed during match highlights, indicating that the effectiveness of the whistle-to-whistle ban is limited. Despite this restriction, individuals, including children, can tune in to Sky Sports News to watch match summaries and are thereby exposed to gambling marketing. The majority of these ads were prominently displayed pitchside (43.8%), static (37.0%) and were frequently accompanied by merchandise or match shirts (10.6%). This prevalence of static ads emphasizes that relying solely on the front-of-shirt display does not adequately mitigate the extent of gambling exposure.

When assessing the brands featured in these ads, Sky Bet emerged as the most prominently displayed brand (26.1%), closely followed by W88 (13.4%). An overwhelming majority (82.1%) of the ads were composed solely of logos, indicating a consistent branding approach. The dominance of Sky Bet and W88 in the messaging is unsurprising, with Sky Bet's contractual obligations leading to its consistent regular appearance in EFL match highlights through logos positioned on either side of the goals.

Beyond this, only 7.6% of the gambling messages were accompanied by a harm reduction message, while only 4.6% included age restriction indications. This raises concerns, as despite the high prevalence of exposure, a disproportionately low percentage of advertisements feature harm reduction messaging.

The timing of these ads is also important to consider. The majority of ads were shown during evening hours, a time when individuals, including children, are likely to tune in to watch match highlights. This dynamic renders the whistle-to-whistle ban largely ineffective, given that match highlights featuring a significant number of gambling ads (2,014 in total) are aired throughout the day on Saturdays via Sky Sports News.

Table 5: Results from the frequency analysis of 15 hours of Sky Sports News Coverage 06.00 - 21.00 on Saturday 12th August 2023.

Sky Sports News	i e
Total frequency of gambling messages	657
Total number of identical references	2,014
Most common format (% of identical references)	Pitchside (43.8%) Static (37.0%) Merchandise or match shirt (10.6%)
Type of gambling (% of frequency of gambling messages)	Logo only 82.5%)
Most frequent brand (% of frequency of gambling messages)	SkyBet (26.1%)
Method of initiating gambling (% of frequency of gambling messages)	24.7%
Most common brand (% of identical reference)	Sky Bet (8.5%), W88 (4.4%), Unibet (2.8%)
Method of initiating gambling (e.g. website) (%)	24.7
Harm reduction message (% of frequency of gambling messages)	7.6%
Age restriction message (% of frequency of gambling messages)	4.6%
Time in which gambling messages occurred	
6am – 9am	178 (26.18%)
10am – 12pm	113 (17.02%)
1pm – 3pm	72 (10.84%)
4pm – 6pm	156 (23.49%)
7pm – 9pm	138 (20.78%)

5.3 TALK SPORT RADIO

The analysis of Talk Sport Radio revealed a total of 117 gambling messages from 07.00 to 21.00 on Saturday 12th August. Table 6 highlights the key findings. 75.9% of gambling messages appeared during advertisement breaks, while only 1.9% of references to gambling were made by the match commentators, and 22.2% of gambling marketing was part of the studio discussion during the among the radio presenters. This demonstrates that listeners are exposed to gambling marketing throughout the different elements of the radio broadcast, but primarily during advertisement breaks. Notably, Betfair was the most frequently mentioned gambling brand within the radio content analysed, while National Lottery came in second at 13%. Unsurprisingly, sports betting was the most frequent type of gambling referenced at 79.6%, with Lotteries at 16.7%, and Bingo at 3.7%. 90.7% of gambling adverts made reference to specific brand logos. 64.8% of gambling adverts included harm reduction messaging, while 85.2% included age restriction messages.

These findings demonstrate the prevalence of gambling advertising during one day of TalkSport coverage on the opening weekend of the Premier League, indicating that sports fans engaging with football are inundated with gambling adverts should they wish to engage with match content via radio. While sports betting is most common, other types of gambling related activities are also promoted to sports fans and listeners such as lotteries and bingo. Of most concern, is that almost a third of adverts did not include harm reduction messaging which is considered further in the discussion section that follows. Also, of concern is that 45 of the 117 messages were between 9am and 12pm on Saturday 12th August, raising concerns about the likely exposure to children. Exposure to gambling across various media throughout the day serves to normalise gambling. Even if children are legally too young to gamble, they are being socialised to believe this is a normal activity once they are of age and may even be considered a 'rite of passage', particularly for football fans who are over-exposed to this content.

TalkSport Radio		
Total number of identical references	54	
Total number of gambling messages	117	
Format (%)	Ad break (75.9%) Commentator (1.9%) Studio discussion (22.2%)	
Brand (%)	Betfair (35.2%) National lottery (13%) Coral (11%)	
Type of gambling (%)	Sports betting (79.6%) Lotteries (16.7%) Bingo (3.7%)	
Harm reduction message	64.8%	
Age restriction message	85.2%	

Table 6: Findings from the frequency analysis of Talk Sport Radio, 07.30 - 21.00 on Saturday 12th August 2023.

5.4 SOCIAL MEDIA

In total, we recorded 1,902 gambling ads shared by the ten examined GB-licensed betting brands during the period spanning August 11th to 14th. Whilst this timeframe was our key focus, we also captured data on the volume of ads commencing from Monday, the 7th of August, to trace the progression of ad activity leading to the begin of the season. Figure 3 below illustrates the notable surge in social media ads by the 10 big GB gambling brands, as the days led up to the commencement of the new season. Notably, on the Monday (4 days prior to the new season) a total of 317 gambling ads were recorded. By Thursday (1 days before the new season), this number had already escalated to 412 ads, and ultimately peaked at 615 ads by Saturday the 12th of August. This pattern of intensified advertising leading up to significant sporting events resonates with findings from previous research by Rossi et al. (2021).

In more detail, there were 1,129 ads classified as paidfor advertisements, disseminated across Instagram and Facebook, while an additional 773 ads were

Social Media Ads posted by GB Gambling Brands 7th Aug 8th Aug 9th Aug 10th Aug 11th Aug 12th Aug 13th Aug 14th Aug Paid for Ads - Organic Ads -TOTAL -

Table 6: Findings from the frequency analysis of Talk Sport Radio, 07.30 - 21.00 on Saturday 12th August 2023.

organically posted on Twitter/X. Notably, approximately 51% of the organic ads fell under the category of content marketing, a technique that none of the paid-for ads employed. The subsequent flowchart provides an overview of the distribution of ads across different channels and

highlights the distinction between content marketing and conventional advertisements. The following sections will delve into an analysis of organic ads before delving into a more detailed examination of paid-for ads.

Figure 4: Flowchart of collected social media gambling ads posted between 11th an 14th August 2023, split into organic and paid-for ads.



5.4.1 Organic ads

Content marketing

Among the 772 organic ads subjected to analysis, 391 were classified as content marketing, while 382 fell into the category of conventional ads. This distribution indicates that content marketing occupies a notable 50.6% share, emerging as the predominant form of organic advertising. This proportion marks a substantial increase from earlier research conducted in 2018,

which reported that content marketing constituted approximately 39% of such ads (Rossi et al., 2021). Given the distinct nature of content marketing compared to conventional ads, we used two distinct codebooks to facilitate accurate classification. A summary of key findings extracted from the 391 gambling content marketing ads is presented in Table 7.

Table 7: Summary of the content analysis of 391 content marketing ads split into extra-message information, marketing design, and ethical practice & advertising regulations.

Code	Definition	Total	
Extra-message information			
Likes	How many likes do the ads have?	149,768 (avg. 385)	
Shares	How many shares do the ads have?	15,502 (avg.40)	
Impressions / Views	How many impressions do the ads have?	27,065,451 (avg. 72,713)	
Marketing Design			
Posted during match	Ads posted during whistle-to-whistle ban.	152 (39%)	
Use of Emojis	Ads that used use Emojis.	179 (45%)	
Use of humour	Ads that use humorous content.	136 (35%)	
Insider / Expert	Ads that give the feeling of being a insider/expert.	235 (60%)	
Reference to football weekend Ads that refer to the Premier League football weekend.		224 (57%)	
Ethical practice & Advertising Reg	ulations		
Age restriction Ads that make reference to the age restring nature of gambling.		45 (11%)	
Harm reduction messaging	Ads that include a harm reduction message.	45 (11%)	
T&Cs stated	Ads that include information on the T&Cs.	2 (0.5%)	
Identifiable as advertising	Ads that are clearly indefinable as advertising (CAP Code 2.1).	33 (8%)	

The data presents a remarkably elevated level of engagement between users and the ads. Across the 391 content marketing ads scrutinized, an impressive tally of 149,768 likes, 15,502 shares, and a staggering 27,065,451 impressions (i.e how often this ad was seen by users) were amassed. These considerable metrics underscore the pivotal role that social media ads play within a brand's multi-channel marketing strategy. Given

the fundamental premise that content marketing thrives on active user interaction, the strategic deployment of techniques like humour, insider sentiments, and often clever allusions to ongoing football matches isn't surprising. In fact, it's notable that 39% of all ads disseminated within the 96-hour investigative window were timed to coincide with live matches, frequently amid live commentaries. Notably, PaddyPower stands

as an illustrative example, posting a prolific 22 ads during a single match on August 11th, effectively averaging one ad every five minutes.

Figure 5: Example of PaddyPower's Twitter/X account live commentating the a Premier League game. Ads like this have raised severe concerns about whether they are identifiable as advertising, being posted during the whistle-to-whistle ban, as well as not bearing any social responsibly messages (e.g. age restriction, or "BeGambleAware").



In line with previous research, our analysis also revealed significant ethical and regulatory concerns. Despite content marketing being explicitly designated as advertising by regulators, 89% of the analysed ads omitted responsible gambling messages and age restrictions, whilst only 0.5% included terms and conditions.

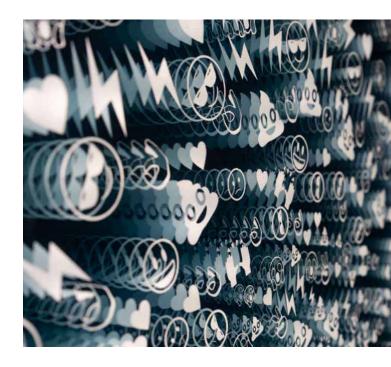
A key worry about content marketing is that it very hard to recognise as advertising. This has been pointed out recently by Rossi and Nairn (2021), and was seen as one of the main reasons why content marketing ads were found to be highly appealing to children. To this end, the regulator stipulates that "Marketing communications must be obviously identifiable as such." (CAP Code 2.1). In our research, however, a mere 33 (8%) of content marketing ads were deemed to be clearly identifiable as marketing communication. In other words: 92%, where judged by the coders as not to be clearly identifiable as ads, and therefore in breach of CAP Code 2.1.

Particularly concerning were tactics employed by William Hill (see figure 6), whose alteration of their account logo to an image of a middle-aged man, along with the omission of a recognizable logo, poses significant problems. Consequently, individuals – especially children and young persons who tend to lack advertising recognition skills – encountering this account and its associated ads face substantial challenges in discerning the commercial nature of the posts. However, even when

gambling brands employ logos and brand names, ad identifiability relies on users knowing brand. This highlights a significant dilemma: While it's widely accepted that children and young people should not familiar with numerous gambling brands, the reality is that they currently need this awareness to recognise that a social media post is, in fact, an advert by a gambling brand. Without prior knowledge of the brand, it becomes exceedingly difficult to identify these content marketing posts as advertisements. This is a profound issue necessitating urgent scrutiny by regulatory bodies.

Figure 6: Example of William Hill's Twitter/X account posting ads during matches. These as raise severe concerns about being clearly identifiable as advertising as they do not use a brand-logo, do not bear any social responsibly messages (e.g. age restriction, or "BeGambleAware"), or include an 'advertising' label.





5.4.1 Organic ads

Conventional Advertising

After looking at the content marketing ads, this report looks at conventional ads (i.e. Ads that have a call for action, or are clearly linked to the brand/product). Out of

the recorded 772 organic ads subjected to analysis, 391 were classified as content marketing, while 382 fell into the category of conventional ads.

Table 8: Summary of the content analysis of conventional ads split into extra-message information, marketing design, and ethical practice & advertising regulations.

Code	Definition	Total		
Extra-message information				
Likes	How many likes do the ads have?	2,623 (avg. 7)		
Shares	How many shares do the ads have?	603 (avg. 2)		
Impressions / Views	How many impressions do the ads have?	7,443,220 (avg. 19,434)		
Marketing Design				
Posted during match	Ads posted during whistle-to-whistle ban.	72 (19%)		
Use of Emojis	Ads that used use Emojis.	262 (69%)		
Use of humour	Ads that use humorous content.	36 (10%)		
Insider / Expert	Ads that give the feeling of being a insider/expert.	149 (39%)		
Reference to football weekend	Ads that refer to the Premier League football weekend.	179 (47%)		
Ethical practice & Advertising Regulations				
Age restriction	Ads that make reference to the age restricted nature of gambling.	250 (65%)		
Harm reduction messaging	Ads that include a harm reduction message.	248 (65%)		
T&Cs stated	Ads that include information on the T&Cs.	140 (37%)		
Gambling Related Content				
Signpost to method of gambling	Ads that make reference to how to the audience could participate in the gamble (e.g. having a link to the website)?.	123 (32%)		
Identifiable as advertising	Ads that make reference to a free or a matched bet	29 (8%)		
Wins	Ads that suggest that you can win something (e.g. win £50 if you predict 4 match stats)	45 (12%)		
Odds	Ads that presents odds for a specific bet.	139 (36%)		

Compared to content marketing it is obvious that conventional ads are less effective in reaping high numbers of engagements. Overall, they received 2,623 likes, 603 shares, and 7,443,220 impressions. This highlights the merits of using organic social media advertising.

A notable proportion (19%) of the ads were posted during the whistle-to-whistle ban, highlighting the challenge of enforcing advertising restrictions effectively. Among the marketing design elements, the use of emojis was prevalent in 69% of the ads, suggesting an effort to enhance visual appeal and connect with viewers on an emotional level. Additionally, 10% of the ads employed humour, and 39% conveyed a sense of insider or expert knowledge. Furthermore, 47% of the ads made references to the Premier League football weekend, aligning their content with the sporting context.

Worryingly, around 35% of the ads did not highlight the



Around 35% of the ads did not highlight the age-restricted nature of gambling, signifying a notable gap in responsible advertising practices.

age-restricted nature of gambling, signifying a notable gap in responsible advertising practices. Similarly, an equivalent percentage (around 35%) omitted messages related to responsible gambling. Additionally, the inclusion of terms and conditions (T&Cs) was even more problematic, with only 37% of the ads containing details about the T&Cs, highlighting a potential need for enhanced transparency and clarity in communication.

About one-third (32%) of the ads made explicit references to how the audience could participate in gambling, often by including links to gambling websites. Additionally, 8% of the ads featured mentions of free bets or matched bets, while 12% suggested the possibility of winning something, such as predicting match stats. Notably, 36% of the ads presented odds for specific bets, offering viewers insights into potential betting opportunities.

5.4.2 Paid-for Ads

For paid-for ads, we noticed there was a surge in paidfor ads as the days leading the days leading up to the commencement start of the new season. On Sunday (5 days prior to the new season) a total of 186 paid-for ads were online, which almost doubled to 350 paid-for ads online on Saturday the 12th of August. It is important to emphasize that the available data doesn't encompass information regarding the audience reach of these ads, as this metric is contingent on the advertising budget allocated by the gambling brand. Based on past campaigns by the brand where such data is available, impressions per ad range from 1,000 to as high as 800,000 impressions.

The content analysis of paid-for gambling ads on social media has revealed a set of critical concerns. These issues underscore the complex landscape surrounding gambling promotion and its potential impact on individuals, particularly the younger audience.

Firstly, the prevalence of references to gambling methods and direct links (89.5%) within the ads is problematic. By consistently pointing users towards gambling avenues, these ads play a crucial role in facilitating direct access to betting platforms. This accessibility could potentially exacerbate impulsive betting behaviours - especially among vulnerable individuals, leading to unforeseen consequences. Furthermore, the inclusion of free bet offers (38.8%) and potential winnings (27.1%) introduces an element of enticement. Such incentives can lure individuals into participating in gambling activities they may not have otherwise engaged with, fostering a culture of risk-taking without fully appreciating the potential downsides.

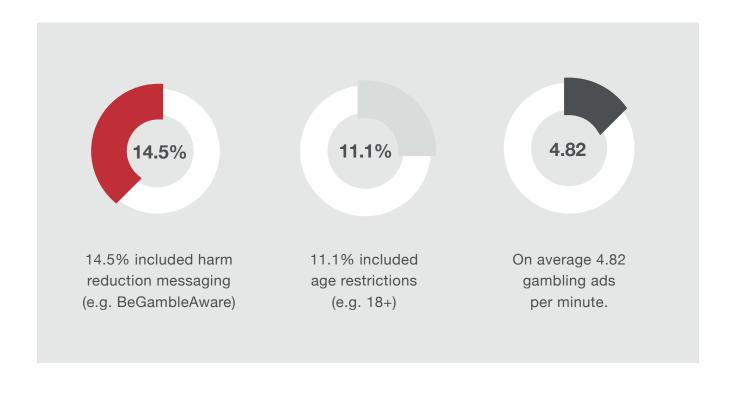
Ethical concerns come to the fore as well. The absence of responsible gambling messages in a substantial portion of ads (34.4%) is worrying. The lack of such messaging seems to fail to adequately address the social responsibly that gambling brands have. Similarly, the omission of age restrictions (29.1%) within a significant portion of ads presents a disconcerting issue.

Finally, the use of insider and expert sentiments (25.6%) within ads can be misleading and potentially manipulative. Creating an illusion of being an authority in gambling can blur the line between informed decision-making and impulsive actions. Such tactics could lead individuals to trust advice from sources that may not have their best interests in mind, thus perpetuating a lack of critical thinking in gambling engagements.



Table 9: Summary of the content analysis of paid-for ads split into marketing design, gambling related content and ethical practice

Code	Definition	Total	
Marketing Design			
Use of Emojis	Ads that used use Emojis.	100%	
Use of humour	Ads that use humorous content.	8.9%	
Insider / Expert	Ads that give the feeling of being a insider/expert.	25.6%	
Reference to football weekend	Ads that refer to the Premier League football weekend.	38.4%	
Gambling Related Content			
Signpost to method of gambling	Ads that make reference to how to the audience could participate in the gamble (e.g. having a link to the website)?	89.5%	
Free bet(s)/matched bet(s)	Ads that make reference to a free or a matched bet	38.8%	
Wins	Ads that suggest that you can win something (e.g. win £50 if you predict 4 match stats)	27.1%	
Odds	Ads that presents odds for a specific bet.	15.9%	
New customer offer.	Ads that make reference to the age restricted nature of gambling.	16.7%	
Ethical practice & Advertising Regulations			
Age restriction.	Ads that make reference to the age restricted nature of gambling.	70.9%	
Harm reduction message.	Ads that include a harm reduction message.	65.6%	
T&Cs stated.	Ads that include information on the T&Cs.	68.2%	



6 DISCUSSION

Our findings support existing literature that gambling has become a normalised part of football consumption, largely owed to the overwhelming prevalence of gambling marketing that exists. The primary aim of this project was to examine the extent of gambling marketing throughout the opening weekend of the English Premier League, encompassing live televised broadcasts, sports news programs, sports news radio, and social media platforms. Taking into account previous studies (Cassidy & Ovenden, 2017; Perves et al., 2020; Ireland, 2021; Torrance et al., 2023), we anticipated that gambling marketing throughout the opening weekend of a major footballing event such as the premier league would be of concern. Across the various media platforms analysed, a total of gambling messages recorded was 10,999, the total number of gambling messages reported across the six matches analysed was 6,966, while the Sky Sports News coverage on Saturday 12th August 2023 accounted for 2,014 gambling messages. The total number of gambling-related adverts viewed on social media across Facebook, Instagram and Twitter accounts of the top ten gambling operators was 1,902, and Talk Sport radio coverage from Saturday 12th August 2023 had a total of 117 references to gambling. The present study is the first to analyse content across this many types of media. The results highlight just how pervasive gambling marketing is across football, which means that football fans may be more vulnerable to being persuaded to engage in gambling due to the interconnected relationship between professional football and the gambling industry.

6.1 THE FAILURE OF SELF-REGULATION

There is a growing body of evidence that suggests the industry's current self-regulatory approach is ineffective in protecting consumers. Our research clearly indicates that these arrangements – whilst they are an acknowledgement by the industry that gambling-related marketing can be harmful – and their implementation are ineffective at reducing gambling adverts, and they simply do not go far enough to ensure the safety of consumers, especially football fans and young people. Therefore, the discussion now turns to considering our findings in relation to the various self-regulated approaches and make recommendations to improve policies in place.

6.1.1 Front of Shirt Sponsorship

Premier League (2023) clubs have agreed to voluntarily withdraw front-of-shirt gambling sponsors from the end of the 2025/2026 season. Previous research has shown that shirt-front messages accounted for only 6.9% of gambling-associated logos during ten EPL matches in the 2022/2023 season (Torrance et al., 2023). Similarly, only 9.11% of the maximum identical references found during the live six matches during this match were found on players' shirts. If the number of players' shirt-based references are removed from the Man Utd-Wolves game – where the visiting team wore a gambling sponsor upon its sleeve – then the number of identical references specifically identified upon the front of players' shirts during the live six matches amounts to 7.94% of total references. In summary, the removal

of logos from the front-of-shirts would have left the remaining 92.06% of identical references found preand post-match, and during the matches themselves.

These findings demonstrate that the front-of-shirt ban does not go far enough in reducing exposure to gambling marketing during match broadcasts. This finding is important as the voluntary removal of gambling marketing from the front-of-shirts not only leaves clubs the ability to maintain sponsors elsewhere on the shirts, such as on the sleeves or on the backs of shirts alongside players' names and numbers, but also to maintain them on other locations such as pitchside hoardings where they were more prevalent during the opening weekend. If clubs are concerned with reducing exposure to gambling via players' shirts, then they should also consider the removal of logos from kits and hoardings completely.

6.1.2 Whistle-to-whistle ban

The same argument can also be made in relation to the whistle-to-whistle ban. The whistle-to-whistle ban was introduced by the BGC to help reduce gambling harm to children where no gambling adverts are allowed to be televised five minutes before and five minutes after matches broadcast before the 9pm watershed. Whilst only 3.45% of individual frequencies were logged during advertising breaks, our findings contribute to growing evidence that suggests the whistle-to-whistle ban has limited effect. The study found that over half (60.09%) of maximum identical references during the six live

matches belonged to BGC members themselves, despite the BGC introducing the whistle-to-whistle ban to reduce the exposure of its members to children. The findings therefore suggest that the whistle-to-whistle ban is ineffective due to the sheer number of identical references which were present elsewhere during the live coverage. In summary, although BGC members have removed advertising from televised, half-time commercial advert breaks before the watershed, they are effective at advertising during live football through other means. Including other media (news reporting, radio and social media), we recorded over 7,000 gambling messages during the whistle-to-whistle ban.

Beyond this, we found that exposure to gambling marketing was also very high in pre- and post-match content, as well as social media and Sky Sport News. A total of 2,014 ads were found in Sky Sports News coverage on Saturday 12th August, while 1,902 gambling adverts were found across Twitter, Facebook, and Instagram between 6th – 13th August, and 50

adverts recorded on Talk Sport radio on 12th August.

The study demonstrates that the voluntary removal of gambling-related marketing during the whistle-towhistle period only partly regulates the consumption of marketing over a single medium. The study found that gambling-related marketing was prevalent on social media, Sky Sports News and Talk Sport radio during the opening weekend, and none of these forms of media consumption are covered by the whistle-to-whistle ban. For example, in the Sky Sports News coverage the most amount of logos were shown between 4pm-6pm with 593 occurrences. This is where Sky Sports News tends to show the entire day's matches including the EFL matches where clubs in this league have a contractual obligation to have gambling logos either side of the goals as Sky Bet sponsors the EFL. The showing of highlights from the EFL during the Sky Sports News coverage reflects the high prevalence of pitchside static advertising, in addition to Sky Bet as the most prevalent brand.



6.1 THE ROLE OF THE WHITE PAPER

This research aims to conduct an in-depth analysis of the prevalence of gambling marketing during the English Premier League's opening weekend between the 11th and 14th August 2023, spanning live televised coverage, sports news programming, sports news radio, and social media.

6.2.1 Preference for Self-Regulation

in April 2023 (Department of Culture, Media & Sport, 2023). The research base which has started to explore the prevalence of marketing within English football was already growing prior to the release of the White Paper (Cassidy & Ovenden, 2017; Purves et al., 2020; Ireland, 2021). The Government therefore already had an opportunity in its review to address the significant presence of marketing within football. However, the White Paper - whilst it signals intent to consult on a wide range of issues within the gambling sector - failed to address the presence of marketing not only within football but across society more generally. Despite the review highlighting that the voluntary actions "have not gone far enough" (DCMS, 2023, p. 71) in preventing harms, it does not propose to mandate legislation which provides more effective regulation of marketing. Instead, the review encourages sporting bodies to develop more socially responsible advertising practices, as well as continuing the whistle-to-whistle ban. Our findings which show how the wide range of gambling messages which occur across multiple sports-related media during an EPL weekend indicate that the encouragement of codes of conduct would not be sufficient in addressing the vast quantity of marketing.

6.2.2 Need for Effective Harm Prevention Messaging

Our findings also highlight the need for more effective harm prevention messaging, another area addressed by the White Paper. With no standardised requirements relating to harm reduction messaging to help taper or moderate the promotional message, it is left up to operators to determine the language and size of the safer gambling messaging compared to the promotional content being used in an advert (Critchlow et al., 2020). Critchlow et al (2020 examined the presence and visibility of age restriction warnings, harm reduction messages and T&Cs within paidfor gambling advertising in the UK across a range of advertisement formats. They found that these features were not present in one in ten gambling adverts and that no gambling adverts included any negative consequences of gambling or provided advice on controlled gambling (Critchlow et al., 2020). Similarly poor results were found in research that investigated harm reduction messages on social media (Rossi et al, 2021). This is important as marketing influences behaviour (Parke, et al., 2014). In summary, while some safer gambling messaging may be included in the advert, it may not be designed by the operators to be as effective in influencing behaviour as they claim.

Given the pervasiveness of gambling marketing across the four different media platforms (match broadcasts, Sky Sports News, Talk Sport radio), findings in the present study point to the need for tighter regulation when it comes to harm reduction messaging to help redress the imbalance compared to gambling marketing. Findings also demonstrate the need for more consistency with messaging relating to safer gambling. Across the live televised matches, only 14.5% of the total number of gambling marketing contained harm prevention messages. In the Sky Sports News coverage analysed, only 7.6% of adverts contained harm reduction messages. For TalkSport Radio 64.8% of gambling adverts included harm reduction messaging and 85.2% of adverts included age restrictions. The state of play is even more concerning when it comes to social media. Only 37% of organic gambling adverts analysed made reference to age restrictions and responsible gambling, whilst a much better 65% and 70.6% of organic ads made references to harm reduction and age warning retrospectively.

Our results highlight just how varied harm reduction messaging can be from match to match, calling for more consistency when it comes to ensuring that gambling- related marketing is accompanied by safer gambling messaging. Our findings research in theis present study also supports previous findings (Critchlow et al., 2020; Sharman, 2023) which argue that a self-regulatory approach to managing this type of information does not work. Whilst we therefore disagree with the recommendation within the White Paper (DCMS, 2023) which calls for the BGC to continue its own approach to harm

Table 10: Summary of harm reduction messages recorded split via media investigated.

FORMAT	Harm reduction messages		Age Res	striction
Match Broadcasts	14.5%	(1010)	11.1%	(773)
Sky Sports News	7.6%	(153)	4.6%	(93)
Talk Sport Radio	64.8%	(76)	85.2%	(100)
Social Media	37.9%	(293)	37.5%	(291)
Paid-for Social Media	65.6%	(741)	70.9%	(800)
TOTAL	20.6%	(2273)	18.7%	(2057)

prevention messaging in the short term, we do agree with its intention to bring together a public health approach to harm reduction messages, replacing industry-owned messaging. However, as opposed to behaviours which may be promoted by operators as responsible, we contend that a more effective approach to harm prevention messages would be by raising societal awareness of the risks of and possible harms associated with engaging with gambling.

6.2.3 The Need for Stricter Regulations of Content Marketing

Prior research has consistently raised significant concerns regarding the use of content marketing, a burgeoning social media technique employed by UK licensed gambling accounts (Rossi et al., 2021; Rossi & Nairn, 2021). The UK Government, in its White Paper (Department for Culture, Media & Sport, 2023, p. 92), has acknowledged the issues associated with content marketing. It has also recognised the efforts of the Advertising Standards Agency (ASA) and the Gambling Commission to address the previously highlighted loopholes. While these steps are commendable, our current study adds to the mounting evidence that underscores the critical challenges posed by gambling content marketing.

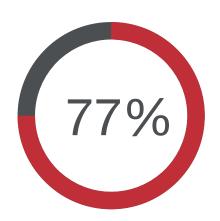
Firstly, our research reveals a significant increase in the volume of content marketing, accounting for 51% of all organic advertising. This substantial rise in content marketing within the gambling industry is noteworthy and demands attention. Secondly, our study raises concerns about the clarity of these

content marketing efforts. We found that 92% of all content marketing ads were deemed by our coders as not clearly identifiable as advertising. This finding raises red flags as it breaches CAP Code 2.1, which stipulates that "Marketing communications must be obviously identifiable as such".

These issues are further exacerbated by the tactics employed by the social media account of William Hill, which involve altering their account logo to an image of a middle-aged man and omitting a recognisable logo. While the absence of a gambling logo in a gambling brand's social media profile picture is highly problematic, it underscores a fundamental conundrum: users, particularly children and young individuals, should ideally remain unaware of numerous gambling brands. However, consumers need to be familiar with a brand (or its logo) to recognise it as gambling advertising. Without this knowledge, it is virtually impossible for children and young persons to exercise their consumer rights effectively, which include the right to identify when they are being advertised to. This is a profound issue necessitating urgent scrutiny by regulatory bodies.

6.3 THE RELATIONSHIP BETWEEN GAMBLING AND FOOTBALL

Our findings support the undeniable notion that gambling has become synonymous with football. The gambling industry has successfully embedded itself within leisure culture and has become an integral feature within football (Raymen & Smith, 2020). The normalisation of gambling within football culture is largely attributed to the deregulation of gambling following the Gambling Act 2005, the financial interdependence between the two industries, and the increased accessibility of gambling via smartphones (Gordon & Reith, 2019). EPL clubs reportedly earn £7 - £10 million in club sponsorship from gambling operators (Sigsworth, 2023), whilst clubs in the EFL recently agreed a renewed sponsorship deal with Skybet worth £73 million, lasting until the end of the 2028/2029 season (Pickworth, 2023). Gambling marketing also reaches some of the largest audiences through football with an average of 1.2 million tuning in to watch EPL matches (Sky Sports, 2021). Gambling is a normal part of daily life for many, and is considered a 'lifestyle activity' among football fans (Raymen & Smith, 2020). Given the increased accessibility of gambling through mobile applications on smartphones, it is now an activity which people can engage in both socially and individually, whether that is at the pub, whilst commuting, at home whilst watching television, or even at work or school (Raymen & Smith, 2020). The socialisation of gambling in football culture is evident where placing bets has become a part of spectating football, facilitated by the deregulation of gambling. Findings in the present study contribute to a growing body of literature that calls for tighter regulation for gambling advertising in football to ensure the safety and protection from harm among sports fans.



An emergency survey of 3,297 members of the Chelsea Supporters Trust (2023) in June 2023 saw 77% of supporters vote against gambling sponsorship

Our findings also point towards a debate on the importance of gambling sponsorship for the economic revenues of clubs within the higher levels of England's football pyramid. This report cannot comment on the commercial decisions taken by individual clubs, and specifically whether the commercial decision was taken to maintain revenue streams from gambling sponsorship for the purpose of reinvestment into squads in order to improve league performance or progress within new competitions. Notably, the home teams of the two games which contained the most gambling adverts are taking part in new competitions thanks to their league positions last year, with Burnley newly promoted to the EPL, whilst Newcastle United are this year competing in the UEFA Champions League. Clubs may also seek to maintain highvalue revenue streams in order to satisfy Financial Fair Play rules which require that clubs seek to attain an element of financial sustainability. Nonetheless, the disparity in adverts between matches implies that some clubs within the EPL are more content than others to rely on sponsorship from the gambling sector. Also notably, the match between Chelsea and Liverpool had significantly fewer exposures to gambling adverts, with no kitbased exposures. Chelsea had planned to enlist a gambling operator for the 2023/2024, but cancelled the deal thanks to pressure from supporters. An emergency survey of 3,297 members of the Chelsea Supporters Trust (2023) in June 2023 saw 77% of supporters vote against gambling sponsorship,

citing concerns over the club's responsibility to its numerous stakeholders in relation to gambling harms. Whilst this deal consisted of principle front-of-shirt sponsorship, it may also have included pitchside marketing of the principle sponsors. This – alongside the voluntary removal of front-of-shirt sponsorship from 2026 – indicates that EPL clubs and their supporters are beginning to recognise the risk of harm to emerge from sponsorship from gambling harms.

However, removing sponsors from the front of shirts whilst allowing it to continue elsewhere does not seriously address the risks of harm towards the EPL audience. This approach is also counterintuitive when compared to that followed by other jurisdictions, considering that the EPL is most watched domestic league in Europe. According to EY (2022), the EPL achieved the highest, global accumulative reach through television networks, reaching 3.26 billion viewers during 2019/2020. This is higher than the German Bundesliga (1.60 billion), the Spanish La Liga (1.56 billion), the Italian Serie A (1.202 billion), and the French Ligue 1 (392 billion). Considering therefore that EPL clubs are the most watched domestic football teams in the world, they are best placed to prepare for tighter regulations of gambling-related marketing with other industries being afforded the opportunity to sponsor part of a globally-exported product.

The high level of gambling messages found during the Sky Sports News coverage - specifically that of Sky Bet - highlights the role of Sky Bet shows the importance of their sponsorship of the EFL. Clubs within the EFL receive significantly lower levels of financial income compared to clubs within the EPL. Furthermore, the reliance upon sponsorship also may generally differ according to the division within which an EFL club is placed. For example, clubs within the Championship receive a greater level of TV revenue compared to clubs within League One or League Two, whilst clubs in the lowest divisions of the EFL may also be more reliant on gate receipts when trying to achieve financial sustainability (Maguire, 2021). Clubs within the Championship also commonly experience financial losses through player recruitment and retention as they seek promotion to the EFL (Philippou and Maguire, 2022). In summary, EFL clubs may argue that the

restriction of sponsorship and gambling adverts may incur a significant, detrimental impact upon their ability to compete and in some cases, survive.

However, a staggered approach towards the effective regulation of gambling-related marketing may allow bodies such as the EPL and the EFL to develop alternative revenue streams. In Belgium, regulation has been staggered. A blanket ban on marketing came into force across publicfacing media (such as television, radio, social media, and newspapers) in July 2023, stadia and football leagues will be prohibited from gambling sponsorship from January 2025, and Belgian clubs themselves have been given until January 2028 to find alternative sponsorship, thus allowing them to honour existing sponsorships and find alternative streams of revenue (Moniteur Belge, 2023). A similar approach has been followed in the Netherlands, with untargeted gambling marketing on television and towards those aged 24 or under on social media banned from July 2023, and the sponsorship of sports clubs prohibited after July 2025 (Overheid, 2023). Sponsorship of sports teams in Spain - a jurisdiction whose premier football division benefits from a global viewership – has been prohibited since 2020 (Boletín Oficial del Estado, 2020). Gambling-related marketing (with the exception of the lottery) was completely prohibited by the government in Italy from 2019 (II Presidente della Republicca, 2018). Restrictions have therefore been enacted within other jurisdictions. The EPL and the EFL would both be well placed to pursue alternative sponsorship arrangements in comparison, particularly given the global popularity of English football.

7 | CONCLUSION AND RECOMMENDATIONS

Due to the intricate connection between football and gambling, sports enthusiasts, particularly football fans, find themselves more susceptible to extensive exposure to gambling marketing, thereby increasing their vulnerability to gambling-related harms. This research underscores the extent to which football fans, who engage with diverse media as an integral part of their football experience, are inundated with gambling marketing during the opening weekend of the Premier League. This inundation occurs across multiple channels, including Sky Sports News, Talk Sport Radio, various social media platforms, and televised match broadcasts.

These findings contribute to the growing body of evidence that suggests that while policies such as the voluntary front-of-shirt ban and whistle-to-whistle ban are an acknowledgement by the football industry of the potential harm caused by gambling advertisement, they do not go far enough to protect sports fans, and especially children, from excessive exposure to gambling. Furthermore, the excessive presence of gambling marketing across various media platforms tends to normalise gambling as an integral part of watching and engaging with football. This is particularly concerning given football's status as one of the world's most-watched sports and its recognition as the UK's national sport.

In light of the compelling evidence presented in this study highlighting the failure of self-regulation, we propose the following recommendations:

Legislation on Gambling Marketing during Matches.

Introduce legislation that comprehensively regulates gambling messages during football matches. The current industry-led "whistle-towhistle" ban, which primarily focuses on TV broadcasts, has proven to be ineffective. The new legislation should extend its scope to include all forms of messaging during matches. This includes gambling marketing on pitchside hoardings, player shirts, and all other visible surfaces within the stadium. It should also encompass radio broadcasts and social media marketing during matches.

Sponsorship Ban Clarity.

Enforce legislation that clearly and unambiguously removes gambling sponsorships from football shirts. The proposed front-of-shirt ban, while a step in the right direction, may have limited impact as gambling logos will still be allowed to appear on other parts of the players' uniforms, such as sleeves. A comprehensive ban should cover all visible areas of the uniform to effectively reduce the prevalence of gambling logos during football matches.

Strengthen Social Media Advertising Regulations.

Strengthen regulatory guidelines concerning social media content marketing in the gambling industry. The current situation, where 92% of content marketing ads are not clearly identifiable as advertising, is a serious concern. Regulatory bodies should work to establish clear and stringent guidelines that ensure content marketing advertisements are prominently marked as such, or indeed, banned. This will help protect vulnerable groups, including children and young individuals, from unknowingly engaging with gambling content on social media. Immediate intervention is crucial to rectify this issue and uphold consumer rights.





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