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Visibility of age restriction warnings, harm reduction messages, and terms and conditions: A content analysis of paid-for gambling advertising in the United Kingdom.

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Visibility of age restriction warnings, harm reduction messages, and terms and conditions: A content analysis of paid-for gambling advertising in the United Kingdom.

Objective: The inclusion and design of age restriction warnings, harm reduction messages, and terms and conditions (T&Cs) in gambling advertising is self-regulated in the United Kingdom. Our study examines the visibility and nature of this information in a sample of paid-for gambling adverts.

Study design: Content analysis of a stratified random sample of gambling adverts ($n=300$) in the United Kingdom from eight paid-for advertising channels (March 2018).

Methods: For each advert, we assessed whether any age restriction warnings, harm reduction messages, and T&Cs were present. If so, visibility was scored on a five-point scale ranging from Very poor ($\leq 10\%$ of advert space) to Very good ($\geq 25\%$ of advert), which had high inter-rater reliability. Descriptive information on position, design, and tone of language was recorded.

Results: One-in-seven adverts (14%) did not feature an age restriction warning or harm reduction message. In adverts that did, 84% of age restriction warnings and 54% of harm reduction messages had very poor visibility. At least one-in-ten adverts did not contain T&Cs. In adverts that did, 73% had very poor visibility. For age restriction warnings, harm reduction messages, and T&Cs, most appeared in small fonts and outside the main advert frame. Most harm reduction messages did not actually reference gambling-related harms.

Conclusion: Age restriction warnings, harm reduction messages, and T&Cs do not always appear in paid-for gambling advertising. When they do, visibility is often very poor and the messaging not clear. The findings do not support a self-regulatory approach to managing this information in gambling adverts.

Keywords: Gambling advertising; Gambling marketing; Harm reduction; Age warnings; Terms and conditions

HIGHLIGHTS

- We examined age warnings, harm reduction messages, and T&Cs in UK gambling adverts.
- The sample included a variety of gambling types and paid-for advertising channels.
- At least one-in-ten adverts did not have age restriction warnings, harm reduction messages, or T&Cs.
- When present, messages had limited visibility compared to advertising content.
- Consumer protection messages should be standardised in UK gambling adverts.

ACCEPTED

1 INTRODUCTION

2 While gambling is a popular recreational activity for many people, for some it can lead to
3 significant problems that affect both the individual and others around them [1-3]. There is wide
4 variation in past-year problem gambling rates in different countries across both Europe (0.12–
5 3.4%) and the world (0.12–5.8%) [4]. In the United Kingdom (UK), an estimated 430,000
6 adults (approx. 0.7% of population) are problem gamblers and a further two million (3% of
7 population) are at risk of gambling-related problems [5]. Understanding the drivers of such
8 behaviour, and opportunities for prevention, is important given that higher-risk gambling is
9 associated with individual, social, and economic concomitant harms [6]. In the UK, and
10 elsewhere, there are calls for a comprehensive harm-reduction strategy that reflects the
11 products, environment, and marketing that shapes gambling behaviour [1,7-9].

12 Given the reported links between marketing and gambling behaviour [10], including
13 consumer protection information in advertising is a low cost and high-reach intervention that
14 may help to mitigate gambling-related harm. Such information can include age restriction
15 warnings, harm reduction messages, and terms and conditions. In the UK, there are legal age
16 restrictions for gambling (≥ 16 years for lotteries and ≥ 18 years for other gambling) [11] and,
17 therefore, age restriction warnings may plausibly reduce the perceived relevance of marketing
18 to young people. Age restriction messages are particularly important as earlier initiation and
19 increased gambling behaviour among children and adolescents is associated with a variety of
20 adverse outcomes [12-14]. Although there is no legal mandate to include age warnings in
21 gambling adverts in the UK, self-regulatory marketing codes remind operators that it is an
22 offence under the Gambling Act (2005) to invite, cause, or permit an underage individual to
23 gamble [11].

24 Harm reduction messages have the potential to moderate the promotional message by
25 encouraging controlled or reduced gambling, highlighting negative consequences, and
26 signposting support [15,16]. In the UK, there is no legal requirement to include harm reduction
27 messages in gambling advertising and no standardised requirements on design, language,
28 format, and placement, although harm-reduction phrases are suggested by self-regulatory
29 marketing codes (e.g. “*When the FUN stops, Stop*” or “*Know your limits and play within it*”)
30 [17,18]. Research suggests that harm-reduction messages can promote moderate changes in
31 gambling behaviour [19,20]. The efficacy and salience of messages, however, is dependent on
32 the positioning design, content, and context, with those that are brief, easy to read, and direct
33 being the most effective [19]. Research also indicates that harm reduction messages should
34 vary, or may need to be tailored to different audiences, as reactions differ by age and degree of

1 gambling experience [20]. These differences relate to the language used, whether consumers
2 must actively respond to remove the message, and message framing [20,21].

3 Advertised gambling products often display terms and conditions (T&Cs), which may
4 be related to the ability to withdraw funds, eligibility to obtain bonuses and inducements, or
5 time restrictions [22,23]. Although it is not a legal requirement in the UK for gambling
6 marketing to contain T&Cs, complaints regarding transparency about the advertised product
7 (e.g. a gamble or offer) are subject to laws on consumer rights and trading standards, which
8 provide a de facto mandate for their inclusion [24]. The design, tone, positioning, and
9 information included in T&Cs is at the discretion of the gambling operator and varies
10 depending on the level and complexity of gamble or inducement promoted. Hing et al found
11 that T&Cs can influence the perceived attractiveness of an advertised gamble among sports
12 bettors [23]. It is suggested, however, that the manner in which such information is currently
13 presented in marketing can lead consumers to overestimate the attractiveness of offers and
14 underestimate the true cost of obtaining bonuses or inducements [23]. Research has found that
15 gamblers are often exposed to persuasively presented incentives and inducements in
16 advertising, which may encourage more frequent or higher-spend betting behaviour or
17 stimulate impulse bets. [25-28]. Consequently, clear and easily comprehensible T&Cs, which
18 accurately reflect the odds of winning or magnitude of potential returns, may be particularly
19 important for discouraging higher-risk gambling and may have a particularly pronounced
20 impact on problem gamblers.

21 In this study, we examine the presence and visibility of age restriction warnings, harm
22 reduction messages, and T&Cs within paid-for of gambling advertising in the UK. We do so
23 across a range of advertisement formats, including broadcast (e.g. television and radio) and
24 non-broadcast (e-mail and outdoor), and across a range of gambling formats (e.g. sports betting
25 and bookmakers to lotteries).

27 **METHODS**

28 **Design and sample**

29 A content analysis was conducted on paid-for gambling advertising ($n=300$) from eight media
30 channels in the UK (Table 1). Gambling adverts for print press, internet, television, radio, and
31 e-mail were sampled from a two week period in 2018 (5–11th March and 12th–18th March),
32 selected using six months of gambling advertising expenditure data. The weeks were chosen
33 to reflect a week with high intensity of gambling advertising (i.e. the highest weekly
34 expenditure in £GBP) and an adjacent week closest to the average weekly expenditure over

1 that six months. Ebiquity, a marketing and media consultancy agency [29], supplied the
2 expenditure data, the advert ‘creatives’, and information on design and placement (e.g. day of
3 week shown). The paid-for advert channels sampled were limited to those monitored by
4 Ebiquity (i.e. not social media pages or smartphone apps). Spend data across the advertising
5 channels sampled are reported elsewhere [30].

6 One-hundred-fifty adverts were randomly sampled from each week. These were chosen
7 from a maximum of 370 adverts in week one (average intensity week) and 666 adverts in week
8 two (high intensity week). Within each week, the random sample was stratified by the
9 proportion of adverts reported through each channel (Table 1). For stratification purposes,
10 adverts only available at a monthly level (direct mail, door drops, and outdoor) were divided
11 across the two weeks and then randomly sampled. The type of gambling and the brand
12 promoted was recorded by the research team when reviewing adverts.

13
14 [TABLE 1]
15

16 **Visibility of age restriction warnings, harm reduction messages, and T&Cs**

17 A coding protocol was developed to examine the presence and visibility of: (1) age restriction
18 warnings; (2) harm reduction messages; (2) and T&Cs about the gamble(s) or offer(s)
19 promoted. If present, the visibility of each feature was rated on a five-point scale (*1=Very poor*
20 *visibility to 5=Very good visibility*). For T&Cs, a ‘non-applicable’ option was included for
21 adverts that did not promote a specific gamble or offer, and therefore T&Cs were not required.

22 Ratings were based on the relative space taken up by each feature within the advert (%)
23 (Table 2). The visibility thresholds were developed, piloted, and revised by the research team
24 by analysing gambling adverts from the advertising channels sampled. The concept of
25 proportional thresholds was derived from other conceptually similar public health contexts,
26 such as the size of warnings used on cigarette packs [31,32]. In this study, the upper threshold
27 (>26% of advert space) was determined by purposively identifying adverts considered to have
28 good visibility of harm-reduction features during initial codebook development. In
29 development and piloting, descending increments of 5% were considered to adequately reflect
30 the different sizes of age warnings, harm-reduction messages and T&Cs observed across
31 adverts. We decided to use the same thresholds for all three features to ensure meaningful
32 comparison. Although colour, font, and positioning also influence the degree of visibility for
33 each feature, these were prohibitively complex, subjective, and time consuming to code.
34 Visibility, in terms of relative space within the advert (%), provided a single metric that was

1 comparable across advertising formats. For radio advertising, visibility was based on the
2 duration of each feature (in seconds).

3 In addition to quantitative coding, a free text response was provided for each item to
4 enable the coders to record a rationale for their visibility score (e.g. how much relative space
5 they estimated was taken up by each feature). The free text response also captured descriptive
6 information on content and language used (e.g. whether websites or telephone helplines were
7 provided in harm reduction messages) and illustrative detail on positioning (e.g. whether
8 situated inside the main advert frame) and design (e.g. fonts and colours used).

9

10 [TABLE 2]

11

12 **Inter-rater reliability**

13 To establish inter-rater reliability, the two researchers who completed the main coding (NC
14 and CM) independently rated two adverts from each advertising channel sampled ($n=16$
15 adverts; 5% of sample). Discrepancies in ratings, and the level of detail recorded in the free
16 text responses, were resolved through discussion. There was agreement for 94% of adverts for
17 the visibility of age restriction warnings (Cohen's $\kappa=0.78$, classed as moderate), 94%
18 agreement for visibility of harm reduction messages ($\kappa=0.78$, moderate), and 100% agreement
19 for visibility of the T&Cs ($\kappa=1.00$, absolute agreement).

20

21 **Data analysis**

22 Data were analysed using SPSS Version 23 (Chicago, IL). Frequencies and proportions (%)
23 were computed for advertising format, whether the advert appeared midweek (defined as
24 Monday–Thursday) or at the weekend (Friday–Sunday), type of gambling advertised, and
25 gambling brands referenced. Frequencies and proportions (%) examined the visibility of age
26 restriction warnings, harm reduction messages, and T&Cs. For each feature, the main themes
27 regarding size, positioning, font, positioning and text were summarised across all adverts,
28 based on narrative information reported in the free text responses.

29

30 **RESULTS**

31 **Sample characteristics**

32 Most adverts sampled were from the print press (75%), with the remainder internet (9%),
33 television (7%), radio (4%), e-mail (3%), direct mail (1%), door drops (1%) and outdoor
34 adverts (<1%) (Table 1). Over half (54%) the adverts were first recorded midweek (i.e. Monday

1 to Thursday). Most adverts were for bookmakers and sports betting companies (79%). One-in-
2 eleven adverts (9%) promoted lotteries, and the remainder promoted online machine gaming
3 (3%), online bingo (2%), casino or card games (1%), and football pools (1%). Six adverts (2%)
4 referenced multiple types of gambling (e.g. sports betting and casino). For seven adverts, it was
5 not clear what gambling format was promoted (2%). Across the adverts, 45 different gambling
6 brands were promoted. One-in-ten adverts (10%) referenced multiple brands, including
7 suggestions of price matching with named competitors and references to sporting events
8 sponsored by another gambling brand.

10 **Visibility of age restriction messages**

11 One-in-seven adverts (14%) did not feature an age restriction warning (Table 3) (Figure 1). Of
12 the adverts which did, 84% of age warnings were rated as ‘very poor visibility’ (<10% of advert
13 space), with the free text responses indicating that most only took up 1-5% of space (Figure 2).
14 The limited visibility of age-restriction warnings was consistent across advertising channels.

15 The free text responses indicated that most age restriction messages were small logos
16 stating “18+” (or “16+” for lotteries) in the same banner as the harm reduction messages, or
17 short phrases reported as part of the T&Cs (e.g. “*Over 18s only*”). Most age restriction
18 messages appeared in small font sizes (relative to the advertising content), were positioned
19 outside of the main frame of the advert (i.e. banners at the extremities), and juxtaposed in terms
20 of colour or size against visually stimulating advert content (Figure 2).

21
22 [TABLE 3]

23 [FIGURE 1]

24 [FIGURE 2]

26 **Visibility of harm reduction messages**

27 One-in-seven adverts (14%) did not contain a harm reduction message (Table 3) (Figure 3). Of
28 those that did, approximately half (54%) of harm reduction messages were rated as ‘very poor
29 visibility’ (<10% of advert space) (Figure 4) and almost a third (30%) as ‘poor visibility’
30 (<15% of advert space).

31 The free text responses indicated that most harm reduction messages were in small font
32 sizes (relative to the advert content), positioned outside the main frame of the advert (i.e.
33 banners at the extremities) or juxtaposed against stimulating content (e.g. grey colours against
34 more striking graphics) (Figure 4). Of the four adverts rated as ‘acceptable visibility’ ($\geq 20\%$

1 of advert space), three were radio adverts during which the harm reduction messages were
2 clearly narrated at the end. One internet banner advert had a harm reduction message rated as
3 ‘very good visibility’ ($\geq 26\%$ of space), as the message took up the entire final frame of the
4 advert (Figure 5). There were no substantive differences across the other advertising channels
5 for harm reduction messages, with most having consistently poor or very poor visibility.

6 Phrases used in harm reduction messages included “*BeGambleAware.org*”, “*Play it*
7 *safe*”, “*Play responsibly*”, “*Please bet responsibly*”, “*Enjoy gambling responsibly*”, “*Gamble*
8 *responsibly*”, and “*When the FUN stops, stop*”. Some adverts also signposted support, e.g. “*For*
9 *advice and information visit www.begambleaware.org*” and “*Need help? Call the National*
10 *Gambling Helpline on 0808 0802 0133*”, mostly within the T&Cs. No adverts communicated
11 negative consequences associated with higher-risk or problem gambling, or specific guidance
12 on controlled gambling (e.g. limit setting or taking breaks).

13
14 [FIGURE 3]

15 [FIGURE 4]

16 [FIGURE 5]

17 18 **Visibility of Terms and Conditions (T&Cs)**

19 Five per cent of adverts promoted a brand only (i.e. no gamble) and, therefore, T&Cs were not
20 required. For the remainder of adverts that did require such information, 11% did not contain
21 any T&Cs (Figure 6). Almost three-quarters of adverts (73%) had T&Cs rated as ‘very poor
22 visibility’ ($< 10\%$ of advert space) (Figure 7) and 11% were rated as ‘poor visibility’ ($< 15\%$ of
23 space).

24 The free text responses indicated that T&Cs were almost always presented in small
25 fonts and neutral colours (e.g. black text on a white background), featured outside the main
26 frame of the advert (i.e. banner at the bottom), contained information deemed complex or
27 technical (e.g. stipulations on withdrawing free bets or bonuses), and were juxtaposed against
28 stimulating advert content (Figure 7). Only a few adverts had T&Cs rated as ‘acceptable’ (2%),
29 ‘good’ (3%), or ‘very good’ visibility (2%). In some radio adverts, for example, clear narration
30 outlined the T&Cs for approximately 10 seconds at the end (typically a third of the advert),
31 while some e-mail adverts contained an extensive list of T&Cs at the bottom of the message.
32 There was little difference among other advertising channels (e.g. print press and television).
33 Comparatively high visibility did not, however, always translate into ease of readability or
34 comprehension. In one print advert, for example, although the T&Cs occupied around 20% of

1 advert space, this contained a lot of complex information and was displayed in small font,
2 outside the main advert frame, and negatively juxtaposed against the marketing visuals (Figure
3 8). This pattern of presentation was also true for most e-mail advertising.

4

5 [FIGURE 6]

6 [FIGURE 7]

7 [FIGURE 8]

8

9 **DISCUSSION**

10 To our knowledge, this is first study to examine the presence and visibility of age restriction
11 warnings, harm reduction messages, and T&Cs within paid-for of gambling advertising in the
12 UK. We found that these features were not present in at least one-in-ten gambling adverts.
13 Currently there is no legal mandate that gambling advertising in the UK must contain such
14 consumer protection features. This means that inclusion is at the discretion of gambling
15 operators, who are free to decide on design, tone, language, format, and positioning, with no
16 explicit and harmonised guidance.

17 The design and positioning of consumer protection messages influences their efficacy,
18 with those that are brief, easy to read, and direct, most likely to be effective [19-23]. Even when
19 such features were present in this study, approximately three-quarters of adverts had age
20 warnings and T&Cs with very poor visibility, and over half had harm reduction messages with
21 very poor visibility. This included messages positioned outside the main advert frame, designs
22 juxtaposed against stimulating content (i.e. neutral colours versus brighter evocative graphics),
23 and information in small fonts. It has been suggested that gambling platforms and marketing
24 are carefully designed to include subtle cues that initiate or increase gambling behaviour,
25 something which literature has termed ‘dark nudges’ [33]. Our findings are consistent with this
26 perspective, as most consumer protection features were subordinate to the advertising message
27 and strategically placed where they will likely receive minimal attention in comparison to the
28 marketing. The results therefore suggest that minimum standards of design may be necessary
29 to increase the visibility of consumer protection messages in gambling advertising. Any
30 attempts to revise or standardise such messages should be based on research which has tested
31 optimal designs with consumers, as opposed to self-regulatory industry-led designs.

32 We also identified issues with the language used in consumer protection messages. For
33 example, consistent with previous research, most adverts provided extensive and complex
34 T&Cs concerning eligibility to participate or receive offers, and often did so in a way that

1 limited visibility [19]. Research has shown that consumers find it challenging to interpret the
2 likelihood of winning on complex gambles (e.g. player to score and team to win), even before
3 taking into account the emotional and attentional commitment needed to process the marketing
4 content and stipulations of participation [34]. There is also evidence that how T&Cs are
5 currently presented in marketing can lead consumers to overestimate the attractiveness of an
6 offer and underestimate the true cost of obtaining bonuses or inducements [23]. Further
7 research exploring consumers' comprehension and recall of T&Cs in gambling marketing,
8 particularly in addition to processing the marketing content and gamble promoted, is a key
9 research priority to improve the efficacy of current practice.

10 We found that no harm reduction messages explicitly discussed possible negative
11 consequences of gambling (e.g. loss of time or money) or provided objective advice on
12 controlled gambling (e.g. limit setting). Instead, most employed phrases from the current self-
13 regulatory guidance, such as "*When the FUN stops, stop*", "*Enjoy gambling responsibly*" and
14 "*Play it safe*" or simply stated telephone or web addresses to signpost sources of support
15 [17,18]. These messages have been criticised for failing to provide objective guidance on
16 controlling gambling, relying heavily on an individual's interpretation of responsibility, and
17 encouraging gambling [35-38]. For example, the word 'Fun' was almost always displayed
18 more prominently than the rest of the message, thus acting as a promotional cue (Figure 7).
19 Research has also shown that the "*When the FUN Stops, Stop*" message – which appeared in
20 approximately two-fifths of the adverts analysed – may be associated with increased gambling
21 compared to when no harm reduction message is shown at all [36,38]. In addition, in terms of
22 reasons for past four week gambling participation, the Gambling Commission [39] found that
23 in 2018 only 29% did so for fun or enjoyment. For the benefit of consumers, appropriate harm
24 reduction messages need to be developed and tested without the involvement of vested interests
25 of the operators.

26 This study has several strengths. The findings are from a large stratified random sample
27 of paid-for gambling advertising, and are based on a range of broadcast and non-broadcast
28 advertising formats, gambling types, and gambling brands, thus increasing generalisability.
29 The visibility thresholds were piloted on gambling advertising and the study had good inter-
30 rater reliability. There are, however, some limitations and avenues for future research. First,
31 we only considered the visibility of consumer protection features. Future research is required
32 to examine the attention allocated to such messages by consumers and perceived salience and
33 behavioural impact. This could eye-tracking studies to examine attention to paid to consumer
34 protection messages [40] or research comparing industry self-regulatory messages to

1 alternative designs [41]. There is already some evidence about how to more effectively present
2 T&Cs [23] and limitations around current harm reduction messages [38], albeit more evidence
3 is needed to improve visibility and effectiveness across different media and gambling formats.
4 Second, all advertising came from two weeks in March 2018 and the findings may not be
5 representative of advertising at other points of the year. For example, as the weeks selected
6 included ongoing sports seasons (e.g. football and horseracing), this understandably led to a
7 high proportion of adverts for sports betting. It is plausible there may be a greater proportion
8 of adverts for other forms of gambling at other stages of the year (e.g. lotteries and casinos), so
9 comparative research would be beneficial. The sample was restricted to paid-for advertising,
10 and the findings may not generalise to other forms of marketing, particularly emergent
11 activities such as social media [30]. Sampling was only based on advertising spend, but data
12 were not available on audience targeting or reach. Finally, adverts were only stratified by the
13 number of adverts reported through each channel, but not proportional spend.

14

15 **Conclusion**

16 This is the first study to examine the visibility, design, content and positioning of age restriction
17 warnings, harm reduction messages, and T&Cs in gambling advertising in the UK. The
18 findings show that these features are not always present in gambling advertising and, even
19 when they are, there are issues with respect to size, positioning, content and design. Given these
20 limitations, additional regulatory steps should be considered to ensure that gambling
21 advertising is accompanied by mandatory consumer protection messages. These messages
22 should subscribe to minimum standards of design which ensure they are always easy-to-read,
23 clearly visible, informative, and reflect the actual harms that can result from gambling rather
24 than subjective messages. These messages should be objectively developed and tested through
25 research and consultation with consumers and those involved in gambling harm reduction, and
26 free from the vested interests of operators.

27

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6 on gambling policy and research to Government. In September 2016, the ABSG (then RGSB)
7 and GambleAware published a [Research Commissioning and Governance Procedure](#) that
8 describes how research priorities are set and commissioned, in isolation from the gambling
9 industry.

10
11 **Ethics:** The study was approved by the University of Stirling's General University Ethics Panel
12 (GUEP413).

13
14 **Author contribution statement:** NC designed the study, with input and support from all other
15 authors. FD and NC led on data acquisition. NC and CM developed the coding protocol, with
16 support from all other authors. NC and CM coded all data and established inter-rater reliability.
17 NC was responsible for all data analysis. NC conceived and wrote the manuscript. All authors
18 were involved in revising and editing the manuscript, and have read and approved the final
19 version. FD was the principal investigator on the overall project, with support from MS.

20
21 **Conflict of interest:** The authors declare that they have no conflict of interest.

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Table 1. Sample of gambling adverts included, by week of selection and advertising channel

Advert channel	Week One (5 th – 11 th March 2018) ¹			Week Two (12 th – 18 th March 2018) ¹			Total
	<i>n</i>	% in week	<i>n</i> selected ²	<i>n</i>	% in week	<i>n</i> selected ²	
Print press	270	73	108	518	78	116	224
Internet	36	10	15	54	8	12	27
TV	32	9	13	39	6	9	22
Radio	13	4	6	21	3	5	11
Email/Media	7	2	3	23	3	5	8
Direct Mail ³	5	1	2	5	1	1	3
Door drops ³	6	2	2	5	1	1	3
Outdoor ³	1	0	1 ⁴	1	0	1 ⁴	2
Total	370	100	150	666	100	150	300

Notes:

¹ Week Two was the week with a high intensity of gambling marketing activity (i.e. the week with the highest weekly expenditure 30th October – 30th April 2018). Week one the adjacent week that reflected average marketing expenditure over the six months.

² The number of marketing creatives selected from each week was determined by calculating the weekly proportion of each channel as a function of 150 creatives (i.e. 10% of adverts were internet in week one, which translated into 15/150 in the sample selected that week).

³ The number of creatives for these channels was only available at a monthly level. Because there was only a small number of creatives in March 2018, for stratification purposes the monthly total was divided across the two weeks.

⁴ This number rounded to zero in the percent calculation (see footnote 2). To ensure at least one creative from each channel was included it was purposefully rounded up and one creative was removed from the media channel with highest level of representation (print press).

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Table 2. Coding protocol for age restriction warnings, harm reduction messages, and terms and conditions (T&Cs) in gambling adverts

Feature	Definition	Codes and visibility threshold
Age restriction warning	How much marketing space is afforded to information or warnings that the content is only appropriate for those above the minimum legal purchasing age for that form of gambling (≥ 16 years old for lotteries and ≥ 18 years old for other gambling)?	<ul style="list-style-type: none"> • No age restriction warning • Very poor visibility ($\leq 10\%$ of space) • Poor visibility (11-15% of space) • Acceptable visibility (16-20% of space) • Good visibility (21-25% of space) • Very good ($\geq 26\%$ of space)
Harm reduction	How much marketing space is afforded to information about controlled or reduced gambling (e.g. gamble responsibly) or signposting to help for higher-risk gambling (e.g. helpline)?	<ul style="list-style-type: none"> • No harm reduction message. • Very poor visibility ($\leq 10\%$ of space) • Poor visibility (11-15% of space) • Acceptable visibility (16-20% of space) • Good visibility (21-25% of space) • Very good ($\geq 26\%$ of space)
Terms and conditions (T&Cs)	How much marketing space is afforded to terms and conditions about the bet, gamble, offer, or inducements promoted (e.g. time limits on free bets, eligibility criteria, or restrictions on any cash withdrawals)?	<ul style="list-style-type: none"> • No terms and conditions. • Not applicable – No gamble promoted • Very poor visibility ($\leq 10\%$ of space) • Poor visibility (11-15% of space) • Acceptable visibility (16-20% of space) • Good visibility (21-25% of space) • Very good ($\geq 26\%$ of space)

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Table 3. Visibility of age restriction warnings, harm reduction messages, and terms and conditions (T&Cs) in gambling adverts

Feature¹	%	n
Age restriction warning		
<i>None present</i>	14	42
<i>Very poor visibility</i>	84	252
<i>Poor visibility</i>	2	6
<i>Acceptable visibility</i>	-	-
<i>Good visibility</i>	-	-
<i>Very good visibility</i>	-	-
Harm reduction messages		
<i>None present</i>	14	42
<i>Very poor visibility</i>	54	163
<i>Poor visibility</i>	30	90
<i>Acceptable visibility</i>	1	4
<i>Good visibility</i>	-	-
<i>Very good visibility</i>	<1	1
Terms and conditions²		
<i>None present</i>	11	31
<i>Very poor visibility</i>	73	207
<i>Poor visibility</i>	11	30
<i>Acceptable visibility</i>	2	5
<i>Good visibility</i>	3	7
<i>Very good visibility</i>	2	5
<i>Not applicable³</i>	-	15

Notes:

¹ Very poor visibility ($\leq 10\%$ of advertising space); Poor visibility (11-15% of space); Acceptable visibility (16-20% of space); Good visibility (21-25% of space); Very good visibility ($\geq 26\%$ of space).

² Percentages reported are valid, i.e. excluding advertising for which T&Cs were not applicable.

³ Not applicable = No specific gamble presented in the advertising (i.e. only about the brand) and thus no terms and conditions applicable.

ACCEPTED

Figure 1. Advert which did not feature an age restriction warning

CORAL

PRICE BOOST

CARDIFF, MIDDLESBROUGH & BLACKBURN ALL TO WIN

Max Bet £10. Available for a Limited Time. Available from 12.30pm Saturday.
Bet void if any match abandoned.

DOWNLOAD THE APP NOW

Download on the App Store | GET IT ON Google Play

Price Boost: Offer Available from 12.30pm 10/03/18 for a limited time only. Max Bet £10, stake limits may apply. Singles only. The 'Was' price advertised is a guide price only, prices are subject to fluctuation.

Figure 3. Advert containing no harm reduction message

BETFRED
 AT THE HEART OF
CHEL TENHAM
 13TH - 16TH MARCH

BEST ODDS GUARANTEED
 ALL RACES
 AT CHELTENHAM

TREBLE THE ODDS
 FOR ONE WINNER ON A
LUCKY 15
 PLUS UP TO 100% BONUS ON ALL
 CORRECT CHELTENHAM LUCKY BETS

5 PLACES
 ON THE 2:50PM
 & 4:50PM RACES
4 PLACES
 ON THE 5:30PM RACE

RSA INSURANCE NOVICES' CHASE
 Cheltenham, 2:10PM. Live on ITV

5/2 Presenting Percy	9/1 Elegant Escape
7/2 Monalee	14/1 Ballyoptic
13/2 Al Boum Photo	18/1 Bonbon Au Miel
7/1 Dounikos	33/1 Allysson Monterg
8/1 Black Corton	100/1 Full Irish

Each-way 1/5 1,2,3

BETWAY QUEEN MOTHER CHAMPION CHASE
 Cheltenham 3:30PM. Live on ITV

6/5 Altior	40/1 Ar Mad
11/4 Douvan	40/1 Charbel
10/3 Min	50/1 God's Own
12/1 Politologue	66/1 Ordinary World
25/1 Special Tiara	

Each-way 1/5 1,2,3

Best Odds Guaranteed - Take a price on any Cheltenham race from 6pm the day prior to racing and if the Starting Price is bigger, we'll pay you out at that price. Applies to Early Prices only. Bonuses - 25% bonus on all correct Lucky 15s, 50% bonus on all correct Lucky 31s, 100% bonus on all correct Lucky 63s. All selections within the Lucky bet must be on Cheltenham Festival runners for the bonus to apply. 20p minimum unit stake. Lucky bonuses apply to bets placed from Saturday 10th March 2018.

Figure 4: Advert which had a harm reduction message with very poor visibility (less than 10% of advert space)

MONEY BACK
as a Free Bet
IF YOU LOSE
on the FIRST & LAST race every day*

Cheltenham Festival

betway
for the love of the game

*Available to new UK online customers. Min stake per bet £2. Min Free Bet £10. One Free Bet per customer, per race, credited within 24 hours. Free eligible bet counts. Eligible bets must be placed on the first or last race each day at The Cheltenham Festival. Eligible bets must be single Race Winner bets. Only bets placed from Saturday 3rd March 2019 are valid. New money bets only. Full terms apply.

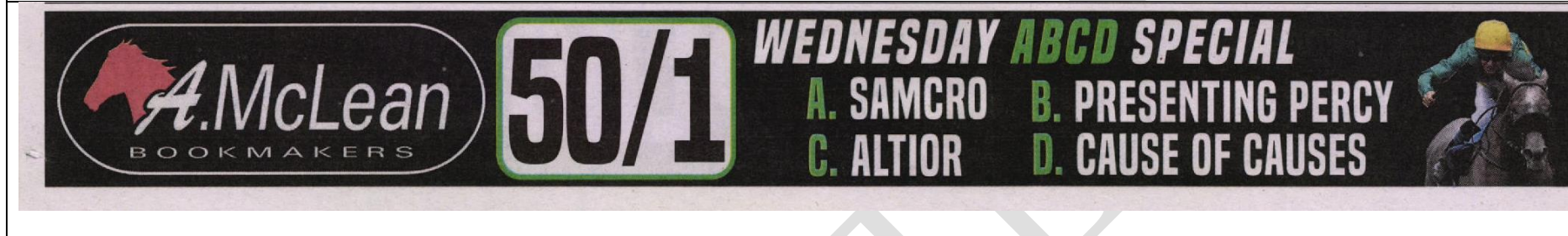
bet the responsible way
www.betway.com/responsible

(Emphasis added in red to highlight the consumer protection message)

Figure 5. Advert which had a harm reduction message with very good visibility ($\geq 25\%$ of advert space, still taken from final frame of internet banner advert)



Figure 6. Advert which contained no terms and conditions (T&Cs)



ACCEPTED

Figure 7. Advert which had terms and conditions (T&Cs) rated as having very poor visibility (less than 10% of available advertising space)



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Figure 8. Advert which had terms and conditions (T&Cs) rated as acceptable visibility, but with potentially challenging presentation.

bet365.com UK: 08000322365

PRICE PROMISE

WE WILL BE BEST PRICE ON EVERY HORSE RUNNING LIVE ON ITV RACING.

We will match or better the prices of the following Bookmakers: Ladbrokes, William Hill, Paddy Power, Coral, Sky Bet and BoyleSports.

Offer applies from 10am. Does not apply to Enhanced Place Term markets. Other exclusions apply. §

Enjoy gambling responsibly. **BeGambleAware.org 18+**

UP TO £100 IN BET CREDITS FOR NEW CUSTOMERS*

ITV RACING 4/1 OFFER
Back a winner at 4/1 or more on ANY race broadcast LIVE on ITV Racing and get a risk free bet on the next race shown LIVE on ITV Racing. ‡
Only available to new and eligible customers

ENHANCED ↑ PLACE TERM MARKETS CHELTENHAM
2.50 1-2-3-4-5-6
4.50 & 5.30 1-2-3-4-5
1.30 & 4.10 1-2-3-4
Price Promise does not apply to these markets
1/4 ODDS A PLACE ON ALL FESTIVAL RACES

Need Help? Call the National Helpline free on 0808 802 0133. View conditions of all our offers at www.bet365.com. *New customers only. Deposit £5 or more and claim within 30 days of registering to receive a 100% matched amount in Bet Credits up to £100. Bet Credits are released after settlement of qualifying bets (must settle within 30 days of claiming) and are non-withdrawable. Returns exclude Bet Credits stake. NETeller, Skrill and Skrill 1-Tap deposits don't count. Selections settled at odds of less than 1/5, Cashed Out bets and bets placed via our Telephone Betting service don't count towards release of Bet Credits. Other conditions, time limits & exclusions apply. §Offer applies to bets placed on Win and Each-Way Fixed Odds markets only, excluding Each Way Extra where place terms are selected which vary from our standard or enhanced place terms for that race. All other markets are excluded from this offer. Races covered by Price Promise are also available for Best Odds Guaranteed, for new and eligible customers. ‡Only available to new and eligible customers residing in Great Britain and Republic of Ireland. Max risk free bet amount is £50 per customer, per race. Bets must be placed in the usual way and can be paid for from your Withdrawable Balance or Bet Credits. Refunds from risk free bets will be returned to the applicable balance. Offer applies to bets placed on Win and Each-Way Fixed Odds markets and Enhanced Place Terms markets only, excluding Each Way Extra where place terms are selected which vary from our standard or enhanced place terms for that race. All other markets are excluded from this offer. Bets placed using our Telephone Betting service will not qualify for this offer. Cash Out and Edit Bet restrictions, event selection & other conditions apply.

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