

Children, young people and gambling: A case for action

Introduction

The third licensing objective in the Gambling Act 2005 specifically singles out children as a vulnerable group who should be protected from being harmed or exploited by gambling. It follows that application of the precautionary principle should be regarded in their case as particularly important. Actions that might potentially be harmful to children and young people, now or in the future, should be avoided unless there is evidence that proves they are not harmful.

Children and young people are different to adults because of their stage of physiological and psychological development, their inexperience and their position in society. They are more vulnerable to gambling-related harms; and the harms they experience are likely to have a large impact, both now and in the future. It is important therefore to identify the conditions, and to reduce the hazards, that might impair children's ability to grow up safely. Keeping children safe requires action by a range of organisations.

This paper sets out the view of the Responsible Gambling Strategy Board on children and young people and gambling. It considers where application of the precautionary principle is appropriate and identifies actions which should be taken, and by whom. The paper builds on a previous position paper on the same subject.¹ It is organised under a number of key principles, set out below.

Overarching principles: Children have the right to be safe. When considering the risks posed by gambling, the precautionary principle is particularly important in relation to children and young people.

Principle 1	Commercial gambling should be regarded primarily as an activity for adults.
Principle 2	Children and young people experience harms differently from adults and can be harmed by the gambling of others as well as by their own gambling.
Principle 3	Online and land-based processes to prevent under-age gambling should always be effective and comprehensive, and kept up to date with technological and social change.
Principle 4	Priority should be given to protecting children and young people from the rapidly developing risks of online gambling.
Principle 5	The extensive and rapidly growing exposure of children and young people to gambling marketing and advertising is a matter of concern which needs to be addressed.

¹ [Young people and gambling-related harm: position paper](#), Responsible Gambling Strategy Board, July 2014

Principle 6	The design, content and imagery used in gambling marketing, advertising and products should not have the effect of creating a particular appeal to children and young people.
Principle 7	Children and young people have a right to information about the risks of gambling.
Principle 8	Parents and families can and should play a significant positive role in reducing the risks of gambling-related harms affecting children and young people.
Principle 9	All children and young people experiencing gambling-related harms, or at risk of them, should be able to access help in a form appropriate for them.

Background

The Gambling Act 2005 defines a ‘child’ as an individual who is under 16 and a ‘young person’ as an individual who is not a child, but is under 18.

For the most part, commercial gambling in Great Britain is legal only for those aged 18 and over. There are, however, two exceptions:

- i. Young persons between 16 and 18 can legally purchase National Lottery products, including draw-based games, scratch cards and online instant wins. They can also participate in society lotteries and football pools.
- ii. There are no age restrictions on Category D games machines, which include fruit machines as well as pushers and cranes.

Private, non-commercial gambling between family and friends is, and always has been, legal at any age.

The legal availability of some forms of commercial gambling to under-18s in Great Britain is unusual by international standards. It has been described as an ‘historical accident’.² We would not recommend it if we were starting from scratch.

Participation and prevalence rates for children and young people

Since 2011, information about gambling among children in school years 7 to 11 (broadly aged 11 to 16) has been collected by the Gambling Commission. These surveys estimate past-week gambling prevalence and, since 2014, rates of problem gambling. The statistics need to be interpreted carefully. The changing nature of online activities means that some children and young people will be exposed to new forms of gambling which may not be well captured by existing methods.

² [Gambling Review Report](#) (the Budd Report), 2001

Participation

In 2017, 12 per cent of 11 to 15 year-olds had gambled in the last week, a decline from 23 per cent in 2011.³ The decline largely occurred between 2011 and 2013 (falling from 23 per cent to 16 per cent) and then between 2016 and 2017 (falling from 16 per cent to 12 per cent). It remains to be seen whether the new low of 12 per cent is the start of a consistently lower trend or a temporary aberration. The decline is consistent with young people's consumption of other risky products. The proportion of under-18 year-olds drinking alcohol, for example, has also fallen.⁴ However, even at lower rates of 12 per cent, gambling is more prevalent than many other youthful activities, such as ten-pin bowling, playing hockey or skateboarding.⁵ It may even be as popular as swimming, as many more will have gambled in the past month or past year.

The majority of the decline is accounted for by reducing rates of private gambling and of gambling on National Lottery based products (including Lotto, scratch cards and online instant wins). Participation rates on fruit machines, online gambling and gambling on other machines have remained stable. An increasing proportion of children who gamble now do so on fruit machines (40 per cent in 2017, compared with 23 per cent in 2011).

Some gambling by children is private betting and gambling among family and friends (41 per cent). Consistent since 2011, however, the vast majority of past-week gamblers have gambled on some form of commercial activity (70 per cent in 2017)⁶, with about half of past-week gamblers only gambling on commercial forms of gambling.

Moreover, over half of past week gamblers (51 per cent)⁷ engaged in an activity that legally they should not have been able to access because of their age, including 13 per cent who gambled online. Parents or older friends and relatives may have knowingly facilitated some of this activity, but not all. In 2017, five per cent of children who bought lottery tickets or scratch cards reported handing over the money themselves. Of the children who reported gambling online using a parent's account, 43 per cent did so without permission.⁸

The survey data also show distinct social patterning of past-week gambling behaviour. Past-week participation continues to be higher among boys (16 per cent) than girls (seven per cent). Other research has shown higher rates of participation among children of South Asian ethnicity. There are strong links between children's gambling participation and their level of disposable income (including pocket money and other sources).⁹ Interestingly, past-week participation does not vary by age. A broadly consistent pattern across most survey years is that gambling in the past week is just as popular among 11 year-olds as among 15 year-olds. This makes gambling unique when compared with other risk behaviours. Rates of smoking or drinking typically increase with age.

³ Trends in children's gambling, H Wardle, 2018

⁴ [Smoking, Drinking and Drug Use among Young People in England – 2014](#), Health & Social Care Information Centre, 2015

⁵ Taking Part Survey, Department for Culture Media and Sport, 2016

⁶ Including participation on Category D machines

⁷ This excludes all participation on fruit and slot machines due to a lack of granular data on the category of machine

⁸ Trends in children's gambling, H Wardle, 2018

⁹ [Gambling and problem gambling amongst young adolescents in Great Britain](#). D Forrest and I McHale, Journal of Gambling Studies 28, 2012

There are, as yet, no nationally representative data on the gambling behaviour of 16 to 17 year-olds. The Health Survey for England, for example, only reports data for 16 to 24 year-olds and sample sizes for a single year are not large enough to look at 16 to 17 year-olds specifically. There are, however, plans to collect more information in a 2018 Gambling Commission survey.

Problem gambling

Gambling Commission surveys estimate that around 0.9 per cent of children aged 11 to 15 are problem gamblers.¹⁰ 0.9 per cent equates to around 31,000 children aged 11 to 15.¹¹ A further 1.3 per cent of this age group are 'at-risk' of problem gambling, equating to an additional 45,000 children. Problem gambling rates among children have remained relatively stable but this should not be grounds for complacency. Any problem gambling by children ought to be a matter of concern.

Problem gambling rates among 16 to 17 year-olds are unknown, though data from the Health Surveys of England and Scotland estimated that 1.1 per cent of 16 to 24 year-olds were problem gamblers - a rate higher than the national average of 0.8 per cent.

We do not yet know enough about the extent and impact of gambling-related harms amongst children and young people. Because young people nowadays have greater exposure to gambling than previous generations, there may be an as-yet-unknown impact on them later in life.

Recommended actions

Existing data do not give a complete picture of the extent of illegal under-age play. The design of existing surveys should be reviewed to collect more information about this. The Commission should also continue its efforts to fill the knowledge gap on gambling participation and prevalence for 16 to 17 year-olds.

Principle 1: Commercial gambling should be regarded primarily as an activity for adults.

It is undesirable for children and young people to be involved with a commercial activity with potential to impact their wellbeing negatively, either now or in the future. Hence the 2005 Act's explicit recognition that they should be protected from being harmed or exploited.

Children's and young people's vulnerability comes from a range of social and other factors, including the fact that the brain is particularly subject to change during childhood and adolescence and into their early 20s. At this stage of their lives, some young people may be more vulnerable to gambling-related harms, for example because of a greater propensity for risk-taking or because they have poor impulse control.¹²

¹⁰ Trends in children's gambling, Wardle, 2018

¹¹ Based on Office for National Statistics 2016 mid-population estimate of 3,459,660 11-15 year-olds in Great Britain.

¹² The same reasoning suggests that attention should also be paid to young adults aged between 18 and 24. They are not, however, the subject of this paper.

The exceptions in the 2005 Act appear to have been because some forms of gambling were then considered low-risk, and because of the historically well-established availability of certain products to under-18s in seaside arcades and elsewhere. They also reflect the challenges any government faces in striking an appropriate balance between citizens' freedom of choice and the Government's responsibility to protect its population from potentially harmful activity.¹³

We recognise that there might be considerable reluctance to bring to an end such a long-established form of play as Category D games. There is, as yet, no conclusive evidence of harm resulting from such play.¹⁴ But we do not believe that any gambling should be regarded as risk-free, particularly when account is taken of possible, unknown, long-term effects. In our view, the precautionary principle should give pause for thought about the continued availability of Category D fruit machines, and possibly other category D products. At the very least, it should rule out any increase in stakes and prizes. We also consider there to be an obligation on operators who offer these products to demonstrate the action they are taking to ensure children using them are not exposed to harm.

The National Lottery is the other main form of commercial gambling legally accessed by under-18s. When introduced in 1994, the Lottery was a weekly draw-based game. Since then, it has changed its product mix. Like operators in other jurisdictions it is experiencing declining revenue from weekly lottery draws. Only 58 per cent of its income now comes from draw-based games. The remainder is from scratch cards (37 per cent) and online instant wins (5 per cent).¹⁵ Both are associated with higher rates of problem and at-risk gambling than draw-based games. It seems likely that, as the National Lottery acts to protect its future revenue streams, its mix of products will increasingly include ones similar to those regulated under the 2005 Act. The more this happens, the more it should call into question the availability of its products to those under 18.

The National Lottery is regulated under separate arrangements to other forms of gambling. It is, however, still gambling. The operator has the same obligations as other gambling operators to promote safer gambling. Its extensive reach (which means that more problem gamblers use its products than those of any other operator) and its ability to sell a range of gambling products to under-18s mean that it might reasonably be expected to have a particular responsibility - not least making its data available for research purposes.

¹³ In 2001 the Budd Report recommended action to ban gaming machines from unlicensed premises, including takeaways and taxicab offices. It considered, but stopped short of, recommending further restrictions. It did, however, recommend a formal review in five years' time to consider whether any such gambling by under-18s should be permitted. In its report 'A safe bet for success' the then Government concluded that the proposed restrictions on unlicensed premises were sufficient to meet the objectives of the Budd Report and that, taking into account the potential impact on small businesses, a further review of the continued availability of gaming machines to under-18s would not be justified.

¹⁴ More research is needed on the links between products and harm, including gaming machines which are available to under-18s. A study: [Gaming and Problem Gambling Among Adolescents in Great Britain](#), Forrest and McHale, Journal of Gambling Studies, 2012 found participation in gambling by children and young people to be higher in coastal areas. It concluded that this was likely to be the result of proximity to seaside arcades. However, the study also found that problem gambling rates were not higher than in non-coastal areas, suggesting that the increased opportunity to gamble in coastal areas, and the higher participation rate, were not linked to a higher rate of problem gambling among under-18s.

¹⁵ Gambling Commission data for 2016/17.

Recommended actions

We need better understanding of the harms experienced by children and young people. The Responsible Gambling Strategy Board research programme proposes a longitudinal study of gambling behaviour to help measure gambling-related harms and understand its longer-term effects. Attention should be paid in the design of this project - the results of which may take some time to bear fruit - to longer-term impacts of gambling by under-18s.

In view of the changing nature of lottery product ranges, we recommend that DCMS and the Gambling Commission review the age restrictions on online instant wins and scratch cards offered by the National Lottery and other lottery providers. We recognise this will require careful consideration of many factors, including the effects on benefits to good causes. We understand, however, that the revenue from sales to under-18s is relatively small.

We are concerned about other established practices, such as point of sale positioning of National Lottery products (and those of other lotteries) alongside confectionery and other items that appeal to children. A review could also usefully consider whether these practices should be restricted.

We do not think that the balance of argument at present supports a recommendation that Category D slot machine products should be restricted to use by adults. Operators of Category D machines - particularly fruit machines – should be conscious however that even with the relatively small stakes and prizes involved, they still need to ensure consumers are not harmed. Bacta, the trade body that represents the venues that provide the majority of these products, has an important role in assisting operators to develop and implement appropriate measures - including appropriate supervision and staff training. Poor conduct by operators in relation to preventing risks to children should be treated severely, as grounds for licence removal.

Operators planning to introduce any new products (or to change existing products) used by those who are not legally adults should always be required first to demonstrate that there is no additional risk of harm – as already happens for all new National Lottery products.

The National Lottery holds data on the use of its products, including by young people between the ages of 16 and 18. We welcome the operator's willingness to make this data available, because it might provide useful information about young people's gambling behaviour more generally.

Principle 2: Children and young people experience harms differently from adults and can be harmed by the gambling of others as well as by their own gambling.

Gambling-related harms are associated with many other health and social problems. Children can be harmed not only by their own gambling, but also by the gambling of their parents or other family members - for example because of neglect or the effects of financial loss. There is also evidence of intergenerational transfer of risky behaviour, as children may be introduced to gambling by their parents or their families. Parental problem gambling is a strong predictor of problem gambling among children.¹⁶

Harms may take some different forms in children and young people. Some factors, like stress and other harmful effects on mental health and family relationships will be present in all age groups. Others, such as loss of a job or inability to pay a mortgage, will impact most directly on adults. But they can also affect children indirectly, along with problems such as bullying and reduced school attendance. Harms suffered as a child may lead to longer-term consequences. Negative effects on attendance or performance at school, for example, could affect exam grades, which might have lifelong consequences.

It is also likely that children and young people experience recovery from gambling-related harms in different ways to adults, with implications for the provision of treatment.

Work is in hand to find more comprehensive ways of measuring the nature and extent of gambling-related harms, the importance of which is recognised in the Gambling Commission's Corporate Strategy.¹⁷ GambleAware and the Responsible Gambling Strategy Board have set up an expert group to oversee the research. Part of the group's remit is to look at the best ways of measuring the harms experienced by children and young people, both directly and indirectly. The Gambling Commission is also considering how to gather more evidence about the gambling behaviour of 16 to 17 year-olds. It is likely that this will involve qualitative research that will further help improve understanding of harm.

Recommended actions

Whenever research is carried out, differences between children and young people and adults should always be considered in project design. These differences should also be kept in mind in the treatment of gambling-related harms.

Staff in schools and other agencies providing support to children and young people should be aware of the potential impact of gambling - including gambling by parents and other family members - and should be able to identify gambling-related issues. They should be able to provide appropriate referral and support, which may require training and resources.

¹⁶ [Children and young people's gambling: research review](#), G Valentine, 2016

¹⁷ [Making gambling safer and fairer, Strategy 2018-21](#), Gambling Commission, 2017

Principle 3: Online and land-based processes to prevent under-age gambling should always be effective and comprehensive and kept up-to-date with technological and social change.

As noted already, 70 per cent of gambling by under-18s appears to involve products which are age-restricted. By no means all of this is facilitated by parents.

The implication is that age-verification procedures are not always operating as effectively as they should. There are several issues:

- i. The LCCP requires most operators, online or land-based, to conduct age-verification testing. Age-verification procedures conducted by land-based licensed operators are, by their nature, unlikely to be perfect. Test purchasing data show that in 2016 appropriate challenge was provided in 82 per cent of cases in arcades, 81 per cent in bingo and 78 per cent in bookmakers,¹⁸ meaning that it was not provided in around one fifth of cases. The equivalent figure for sale of National Lottery products was 91 per cent.¹⁹ It is unlikely that 100 per cent scores could ever be achieved. Even so improvements need to be made. Lessons could be learnt from the experience of other industries. The Wine and Spirit Trade Association, for example, suggests that premises which challenge those who appear to them to be aged less than 25 have been more successful in preventing under-age access to age-restricted alcohol than those only challenging those appearing to be aged less than 21 (the approach widely adopted in the gambling industry).²⁰ We understand that some operators have now begun to implement Think 25 policies.
- ii. There are exemptions from the age-verification requirements for smaller arcades²¹ and bookmakers. This is the only LCCP exemption based on size. We recognise the desire to minimise regulatory burdens on small businesses. However, we question the justification for these exemptions in the light of the importance placed by the 2005 Act on protecting children and young people. Smaller operators ought to be able to reduce the cost of testing by joining their relevant trade body who would then include them in premises testing for a relatively small fee, as happens already to some extent.
- iii. Age-verification testing by local authorities is intended partly to fill any gap caused by the small operator exemptions. Local authorities can legally use under-age people in their tests, which means they can provide the most robust method of ensuring

¹⁸ These figures come from tests using young-looking 18 and 19 year-old testers to test whether operators are following the recommended Think 21 policy. Testing by operators takes place on a relatively large scale. The five largest bookmakers undertook over 9,000 age-verification tests in 2017. The Association of British Bookmakers conducted an additional 600 tests to cover smaller independent bookmakers.

¹⁹ 2017 data from Camelot's Operation Child, based on over 8,000 retailer first visits. All retailers are visited over a four year period.

²⁰ [Rising to the challenge, a report into the application and impact of Challenge 25](#), Wine and Spirit Trade Association, 2014.

²¹ Bacta, Association of British Bookmakers, National Casino Forum and Bingo Association members are, however, subject to age-verification testing as a condition of membership, whatever their size.

effective age-verification procedures are being implemented by operators.²² The number of local authority tests is, however, small and declining. Only 19 test exercises were carried out by local authorities with support from a Gambling Commission compliance manager in 2014, ten in 2016 and six in 2017.²³ It is possible, therefore, that local gaps in age-verification are not being identified. The financial pressures faced by local authorities should not be an obstacle to testing. Local authorities have powers to ensure that the cost of tests is funded by operators through premises licence fees.

- iv. Online operators are allowed 72 hours to confirm that a customer registering on their site for the first time is 18 or over. In principle, under-age consumers can therefore deposit money and gamble for up to three days before their age is verified, although no winnings will be paid until these checks are complete. It is likely that technological developments now mean that the original rationale for this arrangement is no longer convincing. We are not aware of any evidence that this provision is leading to significant levels of under-age play. In our view, however, even the possibility of such play should be stopped. We understand that at least one online operator is now seeking to do more to prevent play before age-verification is completed.

Recommended actions

Operators need to improve their test rates for challenging under-age gambling, possibly looking to apply lessons from other industries (for example, by applying Think 25 instead of Think 21). More frequent tests should be applied to areas or premises types of greater risk, as demonstrated by below-average test rates.

Priority should be given to ensuring age-verification processes keep pace with new challenges from technological change and market trends.

We recommend that the Gambling Commission reviews the current exemptions from operator conducted age-verification testing.

Local authorities should play a leading role in the protection of children and young people. They should make full use of their existing powers to carry out local testing.

It is not acceptable to allow under-age online play before age-verification checks are carried out. A precedent has been set by the National Lottery, which verifies a player's age before any play can take place.

²² Only the Police and the Gambling Commission also have these powers. The Gambling Commission typically use this power by working in partnership with local authorities.

²³ Local authorities can also undertake separate tests not involving Gambling Commission staff and not therefore included in these data. The number of such tests is thought to be low.

Principle 4: Priority should be given to protecting children and young people from the rapidly developing risks of online gambling.

The view that commercial gambling should primarily be an adult activity applies to online activities as well as to land-based ones. In the online environment, rapidly changing technology and new products are exposing children and young people to new risks. It is disappointing therefore that the recently published DCMS Internet Safety Strategy green paper made no mention of gambling.²⁴

A particular concern, already widely acknowledged, is that online players can gamble using tradeable digital items within many popular computer games, sometimes referred to as 'skins'. When these digital items are convertible to real money, they become 'money's worth'. Offering facilities to adult customers in Great Britain to gamble with such items requires a licence from the Gambling Commission. Allowing under-18s to gamble on these websites is illegal, even with a Gambling Commission licence. 20 per cent of boys nevertheless claim to have gambled using in-game items.²⁵

The Gambling Commission has successfully prosecuted one company offering illegal skins gambling (FutGalaxy).²⁶ In other cases it has issued 'cease and desist' letters to those it believes to be operating illegally. Such steps have greatly reduced this type of activity. But opportunities for under-18s to gamble with 'skins' and other digital items remain.²⁷ The companies involved - and their markets - are multi-national. Co-ordinated international action may therefore be required to regulate them effectively.²⁸

The online environment will continue to present new challenges of these and other kinds. Social casino gaming, for example, allows players to take part in activities that look like gambling. The absence of prizes means they are not classed as gambling products. But the risks still need to be better understood, particularly whether playing these games during childhood increases participation in under-age gambling or the likelihood of harmful gambling later in life. Gambling markets are also becoming well-established in relation to eSports (competitive computer gaming). These games and events are attractive to many under-18s and could therefore create exposure to new risks.

Other challenges potentially arise from 'loot boxes' – features of computer games which allow players to open a virtual box to acquire an unknown quantity or quality of in-game items. Under certain circumstances, where the in-game items acquired can be considered

²⁴ [Internet Safety Strategy green paper](#), Department for Culture Media and Sport, October 2017

²⁵ [Young people and gambling](#), a research study among 11-16 year-olds in England, Scotland and Wales, December 2017. NB: The 2017 survey was extended to cover 16 year-olds and Scotland. The data for the full sample are reported here. The previous section on participation and prevalence focused on 11 to 15 year-olds only, and excluded the data on Scotland, to allow comparisons to be made with the previous data sets.

²⁶ The FutGalaxy website allowed players to gamble using in-game items from the popular computer game FIFA 16. These items had the characteristics of a virtual currency. [Gambling Commission website](#), February 2017.

²⁷ [eSports and gambling: where's the action? Analysing the intersection of the gambling and eSports industries](#), Narus Advisors, 2016

²⁸ There are many challenges. Different regulatory regimes make consistency difficult. For example, Daily Fantasy Sports are regulated as betting in Great Britain, but treated as games of skill in the USA.

'money's worth', loot boxes could be classed as gambling²⁹ and could also lead to gambling behaviour becoming 'normalised' with a detrimental long-term effect. Even where specific circumstances mean gambling is not occurring, other consumer issues might need to be addressed - for example, whether consumers actually understand that they will be charged more for these extra features.

Recommended actions

Government, schools and other agencies are already acting to protect children and young people from online risks such as cyberbullying, pornography and extremism. They should give a similarly high profile to issues related to gambling.

Regulators and others should continue to be alert to emerging online risks. Effective horizon scanning is important. Coordinated international research, investigation and enforcement may be required.

Games developers, internet service providers, app stores, search engine companies, and other relevant providers should be vigilant to the possibility of third party use of their products to provide illegal gambling to children and young people, and should be proactive in preventing it.

Parents may need support to become more aware of what their children are doing online, to take steps to prevent under-age gambling and to have conversations about features which are, or share similarities with, gambling.

Principle 5: The extensive and rapidly growing exposure of children and young people to gambling marketing and advertising is a matter of concern which needs to be addressed.

Children and young people are exposed to gambling marketing and advertising through a wide range of media.³⁰ In a Gambling Commission survey of 11 to 16 year-olds, 80 per cent recalled having seen gambling advertising on television, 70 per cent on social media websites and 66 per cent on other websites.³¹ Ten per cent of 11 to 16 year-olds follow gambling companies on social media.³² In total, 91 per cent of 11 to 15 year-olds report having ever been exposed to gambling marketing and advertising. Two per cent of 11 to 15 year-olds who had seen gambling advertisements, including social media, in the past week said either that it prompted them to gamble for the first time, or that it increased their gambling.³³ This equates to around one in fifty children aged 11-15 being influenced to gamble because of exposure to advertising.

²⁹ [Loot boxes within video games](#), Gambling Commission, November 2017.

³⁰ [Gambling Advertising: A critical review](#). P Binde. 2014.

³¹ [Young people and gambling](#), a research study among 11-16 year-olds in England, Scotland and Wales, December 2017.

³² The latter are appealing partly because they can be a source of sports news. Followers may not be aware they are following a gambling company.

³³Data for 11 to 15 year-olds is based on secondary analysis of the combined data from the 2016 and 2017 Gambling Commission omnibus surveys. Data tables are available on request from the Responsible Gambling Strategy Board.

Marketing involves intertwined commercial relationships, which complicate action to reduce children's exposure. For many consumers, in-play betting - particularly on mobile phones during matches - has become an intrinsic part of viewing sport, both on television and as a spectator at live events. For the 2017/18 season, nine out of 20 Premier League football teams are sponsored by gambling firms. Gambling logos or branding appeared on between 71 per cent and 89 per cent of the running time of Match of the Day (the BBC's Premier League highlights show).³⁴ There are also computer football games where gambling sponsorship is visible.

A voluntary code means that gambling advertisements should not be shown on television before 9pm (the so-called 'watershed').³⁵ The code's effectiveness is, however, limited by significant exceptions for sports events and bingo, combined with a shift in viewing habits towards catch-up TV, on-demand television channels and internet streaming services.

Marketing increasingly involves in-app push notifications, which mean that digital content is more visible and harder to ignore. The downloading and use of some apps are age-restricted, but the age-verification processes are self-reported and therefore easy to get around. As a result, marketing for gambling from these apps could be visible to under-18s. For gambling apps, more robust age-verification only takes place when a deposit is made.

Increased exposure to marketing and advertising is part of a process that some refer to as the 'normalisation' of gambling. Ideally, children and young people should not be exposed to marketing and advertising for gambling at all, let alone in the quantities now prevalent. The potential longer-term effects of what has been a relatively recent phenomenon are unknown. There is good reason to think they might be harmful. In other areas of public health, the links between marketing and negative impacts are seen as clear-cut. A number of peer-reviewed studies have concluded that alcohol marketing, for example, increases the likelihood that adolescents will start to use alcohol - and to drink more if they are already using it.³⁶

By not taking action, we are in danger of inadvertently conducting an uncontrolled social experiment on today's youth, the outcome of which is uncertain but could be significant. Research is being commissioned by GambleAware to understand more about how marketing and advertising are experienced by children, young people and other vulnerable groups, and what its impact might be. This research may provide valuable evidence. It will not, however, tell us about possible longer-term effects, which may not be apparent for many years.

It is important to recognise that the 2005 Act also states that children and vulnerable people should not be 'exploited' by gambling. In practice it may be very difficult to ever see clear cut evidence of a casual effect between exposure to marketing and advertising for gambling and harm. But 'exploitative' effects may be more observable. Evidence shows that the vast majority of children aged 11-15 are exposed to gambling adverts and a small proportion are

³⁴ [Frequency, duration and medium of advertisements for gambling and other risky products in commercial and public service broadcasts of English Premier League football](#), R Cassidy and N Ovenden, Goldsmiths, University of London, 2017.

³⁵ The voluntary Gambling Industry Code for Socially Responsible Advertising, which is maintained and enforced by the Industry Group for Responsible Gambling (IGRG), requires that ads for gaming and betting are not shown before 9pm. There are, however, carve-outs for certain forms of advertising.

³⁶ [Alcohol marketing: grooming the next generation](#). Editorial. G Hastings and N Sheron, British Medical Journal, 2013.

either starting or increasing their gambling because of these advertisements.³⁷ This is an unintended but deeply worrying consequence of advertising.

Recommended actions

The combination of unknown consequences and concern about effects on children and young people strongly suggest that a precautionary approach to gambling marketing and advertising is required - even if that involves challenging some well-established market practices.

The precautionary principle states that activities which are likely to have a negative impact should be avoided. There is a strong case for further action to reduce both the visibility of gambling marketing and advertising to children and young people and its impact. The increased volume of exposure online, including through social media, should be a priority.

Regulators should be conscious that the 2005 Act also requires them to ensure children and vulnerable people are not exploited by gambling. This has the implication that evidence of harm is not the only thing that should be considered before taking action on this issue.

Operators are already responsible for the actions of their marketing affiliates. We recommend that the Gambling Commission considers how it ensures operators are more proactive in how they manage and oversee the marketing activities of their affiliates.

We also recommend that the Gambling Commission and ASA give further consideration to the impact of sports sponsorship, because of its high visibility to children and young people.

In-app marketing, such as push notifications, should be sent only to those for whom robust, third party verified, age-verification checks have already been conducted – and not to everyone who has downloaded an app or taken part in free-to-play games.

Wider debate is required to ensure that society strikes an appropriate balance between allowing legitimate businesses to advertise their products and protecting the young and vulnerable from the risks that come from exposure to this marketing.

Principle 6: Content and imagery used in gambling marketing, advertising and products should not have the effect of creating a particular appeal to children and young people.

UK Advertising Codes prevent gambling advertising from being intentionally targeted at children. The ASA's advice states: "betting and gaming ads should not appeal to [under-18s], especially by reflecting or being associated with youth culture." An ASA ruling in 2015 established that whether an advert has 'particular appeal' to children depends on the test of

³⁷Data for 11 to 15 year-olds is based on secondary analysis of the combined data from the 2016 and 2017 Gambling Commission omnibus surveys. Data tables are available on request from the Responsible Gambling Strategy Board.

whether its content appeals more strongly to under-18s than to over-18s.³⁸ The ASA's advice specifically warns operators against the use of cartoon animals and exaggerated graphics and against using names for games which might be familiar or appealing to children. Examples of games identified include 'Piggy Payout', 'Fluffy Favourites' and 'Pirate Princess'. We are also concerned about the imagery used in some National Lottery scratch cards, such as 'Santa's Millions'.³⁹ 'Tiles' and 'icons' on screens of mobile phones and tablets are included in the ASA's definition of an advertisement.⁴⁰

Children and young people may be particularly susceptible to messages which create the sense of a 'group' or 'community' that can be joined by gambling. In our view, operators should be prevented from marketing in this way.

Recommended actions

Content which has a particular appeal to children – either within marketing, advertising or the design of games or products - should not be visible in any type of environment where it will be encountered by under-18s.

Operators should pay greater attention to the ASA's existing advice on the use of marketing images that might have particular appeal to under-18s. They should apply the same guidance to game design, unless all relevant content - including 'tiles' and 'icons' - is only visible once robust age-verification procedures have been completed.

We believe there is scope to define more clearly, and provide improved guidance on, the types of content which should be avoided in these environments. The ASA should aim to provide the same level of clarity for gambling marketing and advertising as it has for alcohol.

Principle 7: Children and young people have a right to information about the risks of gambling.

Information and education have potential to play a useful role in improving gambling safety. Ideally, all young people should be aware of gambling-related risks and know how to keep themselves safe.

Schools are often suggested as a suitable location for preventive education, as almost all young people can be reached there. School-based gambling harm prevention programmes are, however, uncommon. GambleAware has funded two pilot projects, one in a small number of schools in England and one targeting youth projects and settings across Scotland. Evaluation will help to understand their effects. Pilots of preventive education in schools and youth settings are a sensible way forward. Next steps will depend on the results.

³⁸ [Betting and gaming: appeal to children](#). Advertising Standards Authority online advice, October 2017.

³⁹ The design of scratch cards is not captured in the ASA's definition of marketing. They are, however, highly visible to children and young people and are also often positioned in stores alongside confectionery.

⁴⁰ Gambling advertising Q&A, Advertising Standards Authority, November 2017.

Information and education should not, however, be viewed as panaceas. Evaluation of analogous campaigns in other areas suggests that education in schools and other young people's settings can build knowledge, improve relevant skills and develop appropriate attitudes. But it does not necessarily lead to changes in behaviour. Most children and young people tend to ignore public awareness campaigns, which can also be expensive and difficult to target.

Moreover, there is a risk of negative unintended consequences arising from ill-thought-out, non-evidence-based interventions or campaigns. The risk is particularly acute when the target population is children or young people. In the field of substance misuse, a well-documented 'boomerang effect' can occur where the intended message is rejected by the target audience, who react in an opposite way to that intended.⁴¹ Action in this area therefore needs to be carried out carefully.

Public awareness campaigns and school education are generally aimed at all young people. More effort needs to be given to reaching particularly at-risk groups. Research suggests, for example, the need to target children and young people with ADHD or problems with impulse control.⁴² Ways of targeting include using the internet to reach those who are engaged in gambling-like activities, or who might in other ways be considered at risk (such as those following betting companies' twitter feeds). Using young 'vloggers' and other online celebrities with large numbers of followers could offer useful channels of communication. There are opportunities to learn from, for example, mental health campaigns⁴³ which have used online activities to reach specific groups of children and young people.

GambleAware is developing a national public health campaign to raise awareness of the risks of gambling. It will be important that this is designed in a way that makes use of learning from public health campaigns on other issues - including about targeting - and that the impact is appropriately evaluated.

Recommended actions

GambleAware should take forward the learning from the education pilots and, depending on the results, scale up interventions to reach more young people using the materials being developed and other activities. Support from local authorities, schools and the Department for Education should be sought.

Approaches to preventive education on gambling-related risks that integrate it within personal, social and health education (PSHE) and other relevant subjects, such as maths, should be explored. Combining gambling issues with topics like money management may make sense on grounds of practicality, though it would increase the difficulty of measuring impact.

All professionals who work with young people should be informed about gambling issues and enabled to educate and support young people.

More consideration should be given to ways that preventive education can be targeted at more vulnerable groups, learning from experience elsewhere. Children and young people should be involved in the design and development of education interventions.

⁴¹ [Boomerang effects in response to public health interventions: some unintended consequences in the alcoholic beverage market.](#) *Journal of Consumer Policy*, D Ringold, 2002.

⁴² [Children and young people's gambling: research review](#), G Valentine, 2016.

⁴³ Our ambassadors. [Mind website](#)

Principle 8: Parents and families can and should play a significant positive role in reducing the risks of gambling-related harms affecting children and young people.

Children and young people can suffer significant harm because of somebody else's gambling. Parents and other family members can, however, also play a positive role in protecting their children. Examples include modelling safe gambling behaviours, helping children and young people to understand risks and monitoring their children's behaviour, both on and offline. To do this effectively, parents need better to understand the risks of online play and of social media. They also need to be aware of the risks when they inadvertently - or deliberately - facilitate their children's gambling. Such facilitation can happen through the access they give them via mobile phones, laptops and other personal electronic devices, or by allowing access to online accounts linked to their own debit or credit cards.

Ways of encouraging, enabling and supporting parents to have conversations with their children about risk-taking behaviour should be explored. Grandparents, and others who have influence in children's lives, can also play an important role.

Recommended actions

Parents and families need to be aware of the risks presented by gambling to children and young people and of the harms they can inadvertently cause by their own actions. They need to be supported to have sensible and informed conversations about these risks. Work is required to understand what this will mean in practice. A range of public health agencies should consider how it can be achieved. Support should also be available to other family members, such as grandparents.

The National Lottery operator should explore how it could play a more active role in educating young people and their parents and other relevant adults about the potential risks of gambling.

Principle 9: All children and young people experiencing gambling-related harms, or at risk of them, should be able to access help in a form appropriate for them.

There are an estimated two million problem and at-risk gamblers in Great Britain. Only around 8,800 were referred for treatment last year via GambleAware-funded services. Of these, only 16 people were under the age of 18.⁴⁴

The small proportion of people with a problem who are getting treatment indicates that barriers to access to treatment exist for all people suffering gambling-related harms. These barriers will be different, and possibly more acute, for children and young people. Gambling problems take time to develop. Professionals, parents and children and young people themselves may not recognise signs that support is needed. Children and young people who do recognise they have a problem may not want parents to know. Suitable services may not

⁴⁴ This may reflect GambleAware's current funding arrangements, which do not include support for under-18s.

be available - and there may be barriers to access, such as social stigma, physical inaccessibility (due to distance) or lack of awareness (evidenced in the Gambling Commission’s young person’s survey). Advertising for treatment is not focused on children who are therefore less likely to be aware of how to access it. Young people with gambling problems may also have associated issues, such as problems with drugs and alcohol.⁴⁵ Such problems may be more readily recognised by helping services, and gambling problems overlooked.

A different approach may be needed for treatment services for young people. They can experience harm in different ways to adults. The experience of a young person suffering harm from gambling on skins will, for example, be very different to that of a middle-aged man suffering harm from more traditional activities like betting on horses. Different skills and techniques may be required by those counselling young people. In addition, children have a different legal status to adults and safeguarding procedures need to be applied.

The role of families and peer groups can be important in supporting young people experiencing gambling-related harms. Treatment programmes could include family-based therapy.⁴⁶ Online peer groups could also be used.

Recommended actions

GambleAware is commissioning a gap analysis to understand how effectively the supply of treatment services meets demand. The analysis will include gaps in provision for young people. GambleAware will be responsible for considering the implications and adapting their service commissioning accordingly. The possibilities could include:

- i. ‘Low-threshold’ treatment for young people whose current problems are generally less severe than adults who typically present for treatment.
- ii. Improving access to, and awareness of, treatment services.
- iii. Integrating treatment within existing providers of services for children (i.e. Child and Adolescent Mental Health Services, schools, helplines and websites).
- iv. Improved access to support for children affected by the gambling problems of an adult.

The National Responsible Gambling Strategy calls for a wider range of public agencies to take responsibility for reducing gambling-related harms. GambleAware-funded treatment services will never be sufficient to address all gambling-related harms.

Staff working in services for people with problems that are likely to occur alongside gambling-related harms need to be helped to develop greater awareness of gambling-related harms, what actions to take when they encounter them and where and how to make referrals to other services.

⁴⁵ [Young people and gambling](#), a research study among 11-16 year-olds in England, Scotland and Wales, December 2017.

⁴⁶ [Children and young people’s gambling: research review](#), G Valentine, 2016.

Action is also needed to understand how technology could deliver improved access to treatment for the present 'i-generation' of digitally-engaged children and young people. Technology may also provide improved methods for delivering support. For example, treatment support groups are easier to form using social media-like techniques.

Conclusion

This paper has explored the position of gambling in the lives of children and young people. It has recommended a range of actions to reduce gambling-related harms to children and young people and identified who should be responsible for implementation. A number of these recommended actions challenge well-established practices.

We strongly believe that wider debate of these issues is required. As more is learned about children and young people's gambling, we may recommend further action.

There will inevitably be implications for costs if activities like preventive education and treatment are expanded. A lack of funding should not be a barrier to progress. Currently, research, education and treatment are largely funded through voluntary contributions from the gambling industry. Gambling operators, including the National Lottery and other businesses which generate revenue from commercial gambling, should be ready to meet any increase in what is required. The ability to scale-up activity would be much easier if funding was provided through a levy rather than the current voluntary system. There is now broad support from industry and other stakeholders for such a levy.

We welcome further debate and engagement to ensure that the actions set out in this paper are taken.

Responsible Gambling Strategy Board, February 2018

Annex: Summary of recommended actions

Summary of recommended action points	
Responsibility	Recommended action
Data collection	
Gambling Commission	The design of existing surveys should be reviewed to collect more information on the extent of illegal under-age play and gambling participation and prevalence for 16 to 17 year-olds.
Principle 1: Commercial gambling should be regarded primarily as an activity for adults.	
Gambling Commission and DCMS	Consider reviewing the age restrictions on online instant wins and scratch cards offered by the National Lottery and other lottery providers. Also consider reviewing point of sale where products are particularly visible to children.
Gambling Commission	Treat poor conduct in relation to protection of children and young people as one of the most serious regulatory matters and grounds for licence removal.
Operators	Ensure the highest standards for player protection are in place wherever commercial gambling is offered to children and young people. Particular attention should be paid to the introduction of new products and changes to existing ones.
Bacta	Assisting operators offering Category D products to children to develop and implement appropriate measures.
National Lottery operator	Explore how their data can be used to understand patterns of play by under-18s.
Principle 2: Children and young people experience harms differently from adults and can be harmed by the gambling of others as well as by their own gambling.	
Gambling Commission, GambleAware and RGSB	<p>Whenever research or treatment is carried out, differences between children and young people and adults should always be considered.</p> <p>The expert group developing the approach to measuring gambling-related harms should specifically consider a bespoke approach to measuring harms experienced by children and young people.</p> <p>Consider steps to collect or access data to help better understand and measure gambling-related harms experienced by children and young people, including encouraging data collection by other agencies.</p>
Schools and other support agencies	Develop capacity to identify problems that might be related to gambling and be aware of how to provide appropriate referrals and support. May require training and resources.

Summary of recommended action points	
Responsibility	Recommended action
Principle 3: Online and land-based processes to prevent under-age gambling should always be effective and comprehensive, and kept up-to-date with technological and social change.	
Operators	Strengthen processes for detecting and preventing under-age play – particularly in relation to challenges from new technologies. Consider applying lessons from other industries, such as Think 25 policies.
Gambling Commission	Consider reviewing the 72-hour requirement for age-verification by online operators. Consider reviewing the continued suitability of exemptions from age-verification tests for smaller operators.
Local authorities	Make full use of their existing powers to fund and carry out local testing.
Principle 4: Priority should be given to protecting children and young people from the rapidly developing risks of online gambling.	
Government, schools and other agencies	When planning and delivering activities to protect children and young people from online risks, give a similarly high profile to gambling as is given to other risks like cyberbullying, pornography and extremism.
Public health agencies	Consider what support will be needed by parents to play a positive role in protecting their children from gambling risks.
Gambling Commission, RGSB and GambleAware and others	Continued horizon scanning and research to identify emerging risks. Coordinated international research, investigation and enforcement may be required.
Gambling Commission	Continue steps to disrupt and prevent illegal provision of gambling to children and young people, especially in digital environments.
Technology companies, including Games developers, internet service providers, app stores, search engine companies, and other relevant providers	Be vigilant to the possibility of third party use of their products to provide illegal gambling to children and young people - and be proactive in preventing it.
Principle 5: The extensive and rapidly growing exposure of children and young people to gambling marketing and advertising is a matter of concern which needs to be addressed.	
Gambling Commission	Encourage greater debate in society about the appropriate level of marketing and advertising to which children and young people are exposed. Consider how it ensures operators are more proactive in how they manage and oversee the marketing activities undertaken by affiliates.

Summary of recommended action points	
Responsibility	Recommended action
Gambling Commission, DCMS, ASA, CAP	Monitor progress by operators in reducing visibility of marketing and advertising to children and young people. Take action if progress is insufficient.
Operators	<p>Take proactive steps to restrict visibility of advertising and marketing to children and young people. Exposure online and via social media should be a priority.</p> <p>Be proactive in ensuring that affiliates conduct marketing appropriately.</p> <p>Ensure that in-app marketing, such as push notifications, is sent only to those for whom robust, third party verified, age-verification checks have already been conducted.</p>
Principle 6: Content and imagery used in gambling marketing, advertising and products should not have the effect of creating a particular appeal to children and young people.	
Operators	<p>Carefully consider and act on ASA's guidance on marketing which could be particularly appealing to children and young people. Ensure content which has a particular appeal to children is not visible in any type of environment where it will be encountered by under-18s.</p> <p>Unless only visible behind robust age-verification processes, apply to game design the ASA's existing advice on the use of marketing images that might have particular appeal to under-18s.</p>
ASA	Aim to provide the same level of clarity for gambling marketing and advertising as already exists for alcohol.
Principle 7: Children and young people have a right to information about the risk of gambling.	
GambleAware	<p>Consider findings from preventive education pilot evaluations and, if results support expanded provision, increase the number of people who receive this support.</p> <p>Ensure public health campaigns have a clear strategy and targets and are fully evaluated so that impact is understood.</p>
Department for Education, Department for Health, local authorities, schools and support agencies	<p>Provide support to the development of education and information resources. Children and young people should have a say in how this is designed and developed.</p> <p>All professionals who work with young people should be informed about gambling issues and enabled to educate and support young people.</p>

Summary of recommended action points	
Responsibility	Recommended action
Principle 8: Parents and families can and should play a significant positive role in reducing the risks of gambling-related harms affecting children and young people.	
Gambling Commission, GambleAware, Public Health England, Scotland and Wales	Consider how public health messaging can be used effectively to deliver information about risks of gambling to key audiences, including parents, other family members and peer groups, youth and social workers and those who work with children and young people in the criminal justice system.
National Lottery	Play a more active role in educating young people and their parents and other relevant adults about the potential risks of gambling.
Principle 9: All children and young people experiencing gambling-related harms, or at risk of them, should be able to access help in a form appropriate for them.	
GambleAware	<p>Follow through on treatment gap analysis, including focus on services for children and young people.</p> <p>Take into account the implications of the gap analysis in future commissioning decisions.</p> <p>Use new technology to provide additional opportunities for treatment. Reduce barriers to accessing treatment. Identify if there is a need for low threshold-treatment and provide it as needed.</p>
Public health agencies	Ensure that gambling-related harms in children and young people are tackled as a public health issue.
Providers of treatment for drugs, alcohol and other conditions that occur alongside gambling problems	Consider how well gambling problems are addressed within current treatment provision and take action to make more - and more appropriate - treatment available. Consider how well staff are trained to identify gambling-related harms.