

Social Media Sports Betting Ads in the US: Volume, Content, and Regulatory Compliance.



Bristol Hub for Gambling
Harms Research

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Disclosure



Over the past 5 years I have received funding by the *Economic and Social Research Council (ESRC)*, *GambleAware*, *Action Against Gambling Harms*, *UK Gambling Commission*, *CBC News* and the *Bristol Hub for Gambling Harms Research*.

I have never received direct funding by the gambling industry.

BACKGROUND



Gambling Ads are Ubiquitous



Gambling Ads are Ubiquitous

FanDuel Sportsbook @FDSportsbook

Who's the better bet to win MVP next season? 🤔

- ❤️ for Jayden Daniels
- 💬 for Joe Burrow

#RaiseHail 🗣️ | #RuleTheJungle

JOE BURROW	JAYDEN DANIELS
+600	+750
TO WIN MVP	TO WIN MVP

6:00 pm · 6 Jul 2025 · 11.2K Views

Instagram

Paddy Power @paddypower

Klopp looks as if Des Kelly has just let off a rasper in the post-match interview.

50,402 likes

jordan The silhouette will be defined under gym lights. 06.09.18

BetMGM @BetMGM

Myles Garrett or Aidan Hutchinson?

NFL AWARDS DEFENSIVE PLAYER OF THE YEAR ODDS

MYLES GARRETT	+700	WILL ANDERSON	+1200
AIDAN HUTCHINSON	+700	NICK BOSA	+1500
MICAH PARSONS	+750	JALEN CARTER	+1800
TJ WATT	+850	JARED VERSE	+2000
MAXX CROSBY	+1100	TREY HENDRICKSON	+2800

GAMBLING PROBLEM? CALL 1-800-GAMBLER (AVAILABLE IN THE US) 877-9-HOPEFUL OR TEXT HOPEFUL (467383) (NY) 1-800-327-5050 (MA) 1-800-NEXT-STEP (AZ) 1-800-GETS-OFF (IA) 1-800-981-0023 (PR) 21+ ONLY. PLEASE GAMBLE RESPONSIBLY. SEE BETMGM.COM FOR TERMS. SUBJECT TO ELIGIBILITY REQUIREMENTS. IN PARTNERSHIP WITH KANSAS CROSSING CASINO AND HOTEL. THIS PROMOTIONAL OFFER IS NOT AVAILABLE IN DC, MISSISSIPPI, NEW YORK, NEVADA, ONTARIO, OR PUERTO RICO.

4:40 pm · 6 Jul 2025 · 6,572 Views

Big Data Analysis in 2018



Objectives:

- **Volume** and **Content** of gambling ads on Twitter,
- **Age of users** that engage (liking, sharing) with gambling ads, or follow gambling accounts,
- Investigate **regulatory compliance** to advertising codes.

Big Data Analysis Results

 **Unibet** ✓
@unibet

Hummels v Mbappe

Close enough! 🤝



9:40 pm · 15 Jun 2021 · Twitter Web App

March

April

May

June

July

Date (2018)

 **Paddy Power** ✓
@paddypower

Morning all. It's Monday.



71%

CONTRAVENED
REGULATIONS

298 OUT OF 422 GAMBLING
ADVERTS ON TWITTER
APPEARED TO CONTRAVENE
ADVERTISING REGULATIONS



Today's agenda:

1. **Social Media Gambling Advertising** – An Overview.
2. **US Study:** Content, volume and regulatory compliance of social media gambling ads.
3. **Online experiment:** Are social media gambling ads appealing to children?
4. **Online experiment:** Are children able to recognise gambling ads?
5. **Impact and further recommendations.**

Social Media
Gambling
Advertising –
An Overview.



A little experiment



Worldwide Offers

@WorldOffer



Go To This Website a lot of FREE MONEY ON IT- Free and Matched Bets Now [BetGinger.com](https://betginger.com) #redhead





Burger King 
@BurgerKingUK

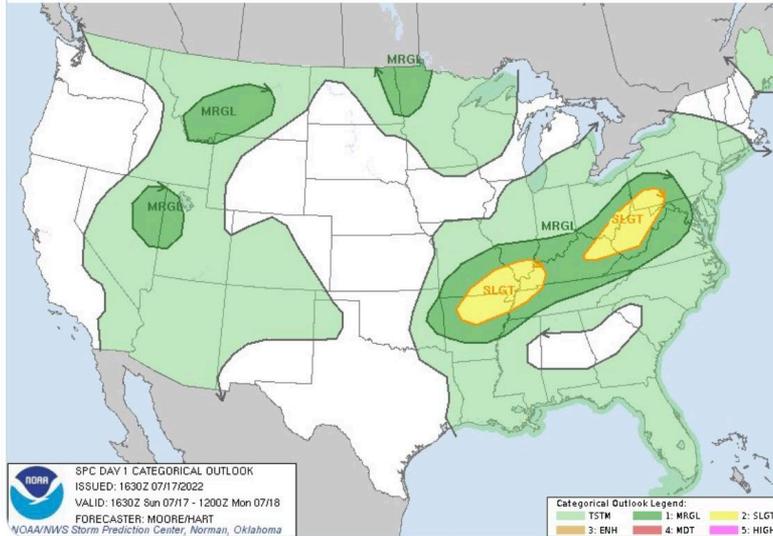


If you think the UK is hot, the US is experiencing a
ninja turtle...



NWS Storm Prediction Center  @NWSSPC · 17 Jul

11:32am CDT #SPC Day1 Outlook Slight Risk: Across the Ozark Plateau through
the Ohio River Valley go.usa.gov/YWq5



9:00 pm · 18 Jul 2022 · Twitter Web App



Midnite
@midnite

Check out our latest promotion to kick off the Call of Duty League

🎮🎮 Get up to £10 Money Back on your first losing live bet on any of the COD games this weekend 🎮🎮

Check out all the details of the promotion here - help.midnite.com/en/articles/36...

#CallofDuty #CallofDutyLeague 🏹





Paddy Power 
@paddypower



Morning all. It's Monday.



7:54 am · 18 Jul 2022 · Twitter for iPhone

7 Retweets 87 Likes

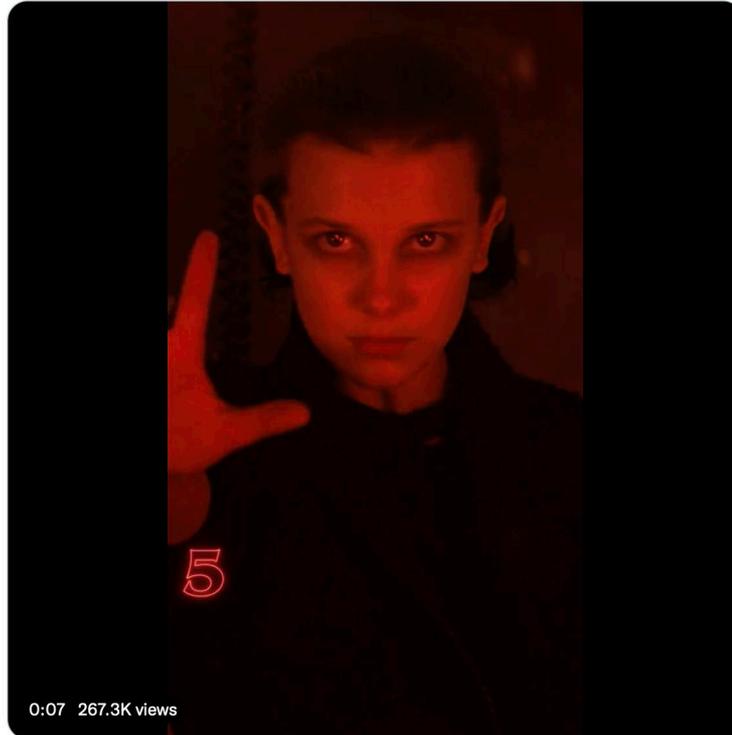


KFC UK
@KFC_UKI



How many secret herbs and spices are there?

#StrangerThings4



From **Stranger Things**

How many adverts did you see?

Mentimeter



bristol.ac.uk

<https://www.menti.com/aludinn8dzid>



Midnite
@midnite

Check out our latest promotion to kick off the Call of Duty League

🎮🎮 Get up to £10 Money Back on your first losing live bet on any of the COD games this weekend 🎮🎮

Check out all the details of the promotion here - help.midnite.com/en/articles/36...

#CallofDuty #CallofDutyLeague 🏹



5:20 pm · 7 Nov 2022 · advertiser-interface

🚩 Promoted

sing



Nike
@Nike

Only @EliudKipchoge is faster than himself. Congratulations on beating your own world record in Berlin and pushing us all to reimagine our limits.

OR



ASOS
@ASOS

Tonight's plans:



8:01 pm · 7 Sep 2021 · Hootsuite Inc.

7:30 pm · 25 Sep 2022 · Twitter Web App

ROSSI & NAIM, 2022

Content marketing is about “developing stories that inform and entertain and compel customers to act – without actually telling them to”.

- Aims at eliciting (positive) emotions and does not have a call to action.
- A distinguishing feature of social media content marketing is *shareability*.
- Usually, no clear link or relationship to the brand, product or service.

Marketing and Decision-Making Theory

FanDuel Sportsbook @FDSportsbook

Who's the better bet to win MVP next season? 🤔

❤️ for Jayden Daniels
💬 for Joe Burrow

#RaiseHail 🗣️ | #RuleTheJungle



The advertisement features two NFL quarterbacks: Joe Burrow of the Cincinnati Bengals on the left and Jayden Daniels of the Washington Commanders on the right. Below their images, the text reads "PICK ONE" in large yellow letters. Underneath, two boxes offer betting odds: "+600 TO WIN MVP" for Joe Burrow and "+750 TO WIN MVP" for Jayden Daniels. At the bottom, there is a small disclaimer: "Gambling Problem? Call 1-800-GAMBLER or visit RG-help.com. Call 1-888-789-7777 or visit ccpg.org/chat (CT). Hope is here. GamblingHelpLineMA.org or call (800) 327-5050 for 24/7 support (MA). Visit www.mdgamblinghelp.org (MD). Call 1-877-SHOPE-NY or text HOPENY (467369) (NY). ©2022 FDC. All rights reserved. All odds subject to change without notice. Odds subject to change."

6:00 pm · 6 Jul 2025 · 11.2K Views

Advertising Appeals

Personal appeals will lead to affective ones

They equal weight in the

years challenged to the force of feelings, emotion, Miller, 2000; Heath and

PP Paddy Power @paddypower

Morning all. It's Monday.

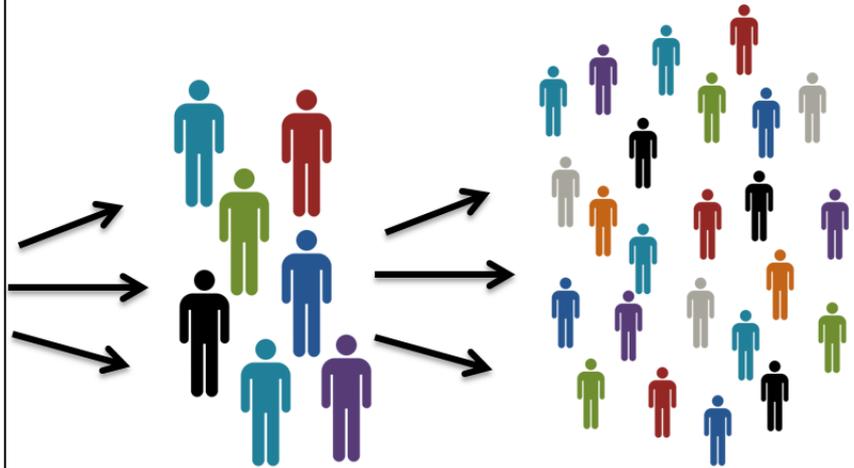


The GIF shows a man with long hair and a mustache, shirtless and wearing green shorts, sitting on a large orange sofa. He is looking towards the camera with a relaxed expression. A white electric fan is positioned in front of him. The background shows a wooden door and a small dog on a table.

7:54 am · 18 Jul 2022 · Twitter for iPhone

7 Retweets 87 Likes

The power of engagement



Content,
Volume and
Regulatory
Compliance of
Social Media
Gambling Ads





AIMS & OBJECTIVES

1

To investigate the volume and content of organic gambling advertising on Twitter, Instagram, Facebook and TikTok by the four largest U.S. sports betting brands.

2

To investigate the volume and content of paid-for gambling advertising on Instagram and Facebook by the four largest U.S. sports betting brands.

3

To investigate the compliance of social media gambling ads (organic and paid-for) to the key advertising regulations by AGA and FTC.

AIMS & OBJECTIVES

1

To investigate the volume and content of organic gambling advertising on Twitter, Instagram, Facebook and TikTok by the four largest U.S. sports betting brands.

Brand	Owner	Facebook Followers	Instagram Followers	TikTok Followers	X (Twitter) Followers	Total Followers
ESPN Bet	Penn Entertainment	2,700,000	2,300,000	9,600	5,400,000	10,409,600
DraftKings Sportsbook	DraftKings	1,000,000	187,000	736,000	276,700	2,199,700
FanDuel Sportsbook	Flutter	52,000	260,000	470,000	341,300	1,123,300
BetMGM	MGM	45,000	106,000	20,100	311,900	483,000

All ads collected during:
29th July to 4th August 2024

United States All ads FanDuel Sportsbook

Saved Searches



FanDuel Sportsbook

Ads About

~99 results

Keyword Filters Save Search

Active status: Active ads

Launched in July 2025

<p>Active</p> <p>Library ID: 1572482923726314 Started running on 9 Jul 2025 Platforms </p> <p>This ad has multiple versions </p> <p>See ad details</p>	<p>Active</p> <p>Library ID: 710370975319599 Started running on 9 Jul 2025 Platforms </p> <p>This ad has multiple versions </p> <p>6 ads use this creative and text</p> <p>See summary details</p>	<p>Active</p> <p>Library ID: 711617675054549 Started running on 9 Jul 2025 Platforms </p> <p>This ad has multiple versions </p> <p>6 ads use this creative and text</p> <p>See summary details</p>	<p>Active</p> <p>Library ID: 740215911839022 Started running on 9 Jul 2025 Platforms </p> <p>This ad has multiple versions </p> <p>6 ads use this creative and text</p> <p>See summary details</p>	<p>Active</p> <p>Library ID: 745244054640567 Started running on 9 Jul 2025 Platforms </p> <p>This ad has multiple versions </p> <p>See ad details</p>
<p> FanDuel Sportsbook Sponsored</p> <p> This summer, the world's game meets America's #1 Sportsbook. Bet on every goal, corner, and comeback with FanDuel. </p>  <p>Go For Goal Download FanDuel Sportsbook Now Install Now</p>	<p> FanDuel Sportsbook Sponsored</p> <p>The big fight just got a BIG upgrade. Claim your 30% Profit Boost to use on any wager in the Taylor vs Serrano fight.</p>  <p>Make it a Knockout Download FanDuel Sportsbook Now Install Now</p>	<p> FanDuel Sportsbook Sponsored</p> <p> The W is heating up—bet every buzzer-beater with FanDuel, America's #1 Sportsbook. </p>  <p> Bet the WNBA with FanDuel Download FanDuel Sportsbook Now Install Now</p>	<p> FanDuel Sportsbook Sponsored</p> <p> The W is heating up—bet every buzzer-beater with FanDuel, America's #1 Sportsbook. </p>  <p> Bet the WNBA with FanDuel Download FanDuel Sportsbook Now Install Now</p>	<p> FanDuel Sportsbook Sponsored</p> <p>Play ball! Get \$150 in Bonus Bets if your first \$5 bet wins on America's #1 Sportsbook.</p>  <p>PLAY GOOGLE.COM Join Now Sports Betting & Live odds on NFL, MLB, UFC, NBA, NHL Install Now</p>



AIMS & OBJECTIVES

3

To investigate the compliance of social media gambling ads (organic and paid-for) to the key advertising regulations by AGA and FTC.

Gambling Marketing Regulations

- Most European countries have clear and detailed gambling marketing laws.
- Great Britain is an outlier in relying on industry self-regulation.

	Germany	Belgium	Italy	Spain	The Netherlands
Sponsoring (sports)	✓	✓	✗	✗	✗
Commercials during sport broadcasts	✗	✗	✗	✗	✗
Public posters	✓	✗	✗	✗	✗
Online advertising	✗	✗	✗	✗	✗
TV & Radio advertising	✗	✗	✗	✗	✗
Social media influencers	✗	✗	✗	✗	✗
Targeted Ads	✓	✗	✗	✗	✗

✗ = Banned ✓ = Permitted ✗ = Permitted with limitations

Source: Rossi & Ipsos, 2024

18+ MESSAGING

46. It is a specific requirement (introduced in the second edition of the Code) that every television and print advert should carry clearly either a '18+' symbol or a 'no under 18s' type message.

ONLINE BANNER ADVERTISING

47. It is not possible or appropriate to require that all online banner advertising should carry safer gambling messaging, but it is not unusual for such adverts to provide click-throughs to further product information. Therefore, the industry Code recommends that where this happens the landing page should provide a further click through to either (i) the operator's own safer gambling microsite or web pages; or (ii) a generic source of information such as www.gambleaware.org. For the avoidance of doubt this provision does not apply to banner advertising on gambling websites themselves because they already provide links to safer gambling information.

SPORTS' SPONSORSHIP

48. The advertising of adult-only gambling products or product suppliers should never be targeted at children. This applies equally to sponsorship and this Industry Code continues to require that gambling operators do not allow their logos or other promotional material to appear on any commercial merchandising which is designed for use by children. A clear example of this would be the use of logos on children's sports' shirts. Children's shirts and other merchandise will be defined as those that do not attract VAT.

SPONSORSHIP OF TELEVISION PROGRAMMES

49. The sponsorship of television programmes was not covered explicitly by the original Industry Code on the basis that such sponsorship is technically different from advertising and is, for example, subject to different regulatory controls by Ofcom which prevent any kind of sales message or call to action.
50. Nevertheless, in order to reinforce the consistency of the viewing experience, where sponsorship of a television programme takes place the Industry Code was amended to make it a requirement that a reference to the GambleAware should be included. Anything more than that may well fall foul of the Ofcom rules, but in any event its inclusion was a worthwhile addition to the Code. As with other references in the previous versions of the Code, the relevant GambleAware website is now www.gambleaware.org.
51. However, the Fifth Edition of the Code did include an additional requirement relating to sponsorship of television programmes featuring live sport before the 9.00pm watershed. (See Section above on Television Advertising – Watershed)

SOCIAL MEDIA - MARKETING

52. Marketing on social media is the responsibility of both the platform providers, such as Facebook, and the gambling operators themselves. The gambling industry through its Code can only seek compliance by the operators, but social media has grown in importance since the Industry Code was first established and it should now be extended accordingly.
53. It should also be remembered that the CAP Code already covers marketing on social media. Despite that, the Industry Code is designed to complement existing regulation of this kind and the following provisions were added in the Second Edition:
- All gambling operators should have on their corporate webpages (i) safer gambling messaging; and (ii) links through to sources of more detailed information.
 - Account profiles for operators' branded websites on social media will also clearly carry '18+' symbols or a 'no-under 18s' type message as well as a reference to www.gambleaware.org.
54. THE THIRD EDITION OF THE CODE ADDED:
- A requirement that gambling operators carry the required social responsibility and age requirements on consumer-facing marketing content on their YouTube channels.
 - A requirement that operators age restrict all direct marketing video uploads to YouTube. This can be done simply by 'checking' the age restriction option when uploading content via: <https://support.google.com/youtube/answers/2950637rd1>.
55. THIS SEVENTH EDITION OF THE CODE ADDED:
- A requirement that sponsored/paid-for digital media advertisements must be targeted to consumers aged 25+, where digital media platforms provide a 25+ age filter. This measure adds an additional level of assurance around the age of consumers where operators do not hold any first party data about the consumers targeted, (i.e. where operators are wholly reliant on self-certified third party data, which may not always be correct.) This provision does not apply to channels covered by clause 58. This requirement relates solely to prospecting campaigns where the targeted audience is not already verified through the operator's own age-verification processes.

Given improvements in identification technology if a digital media platform can verifiably prove that its age gating systems can prevent under 18s from accessing the gambling advertising content, then the Betting and Gaming Council, on the recommendation of operators and in consultation with other third parties, may consider whether to reduce the age filter to 18+.

- A requirement that organic YouTube content produced by an operator and operators' own YouTube channels must be age-restricted to 18+ to ensure users log in to age-verified accounts in order to view content.
- A requirement that operators should undertake reasonable endeavours to exclude customers with an active self-exclusion or cool-off period and those who the operator has defined using its own method of assessment as a 'higher risk' customer, from its paid-for social media campaigns.
- A requirement that operators must use their own social media pages to post frequent safer gambling related information. It is expected that, in determining sufficient frequency, operators should take into account how active their own social media accounts are and act accordingly.

PROMOTING CONSUMER AWARENESS

56. There are a number of steps that consumers can take in order to minimise their exposure to gambling advertising across social media platforms. However, this information may not always be easily accessible in a collated format. The Sixth edition of the Code recognises that operators are well placed to provide this information to their customers. As such, the Sixth edition includes;
57. A requirement that each operator provides information on how to limit exposure to gambling advertising across social media platforms. It is for each operator to decide where best to situate this information or the industry may adopt a common landing page for this information, available to operators via a link from their web site. However, the expectation is that it should be easily accessible and sufficiently prominent. This list of instructions will cover the largest social media platforms.

SEARCH ACTIVITY

58. The Sixth edition expanded the scope of the IGRG Code to cover search advertising through the inclusion of a requirement that any search advertisements must clearly contain 18+ messaging in the ad copy, along with safer gambling messaging within the core ad format.
59. Online search activity is based on 'keywords' which link to consumer's search queries. Search engines offer the ability to advertise against queries via keywords. In order to introduce an enhanced level of consumer protection, the industry will introduce a shared blacklist of negative keywords against which no gambling advertising should be served. This blacklist will include keywords which indicate vulnerability and keywords which relate to children amongst others. The blacklist will be collated by the Betting & Gaming Council. The industry keyword blacklist will be updated on a regular basis to ensure the list remains a robust control over the passage of time.

This Seventh edition of the Code includes;

- A requirement that operators incorporate industry keyword blacklist into all relevant campaigns where applicable.
 - A requirement that operators will ensure revised blacklist is incorporated into campaigns in a timely fashion.
60. For the avoidance of doubt, the requirement above shall also apply to any affiliate carried out on behalf of an operator. A wide list will also be submitted to online platforms for incorporation into their systems.

AFFILIATE ACTIVITY

61. The Gambling Commission are clear it will be held responsible for any marks carried out by their affiliates. As such are expected to ensure that all relevant requirements are also followed by the marketers. The Sixth edition of the Code build on this requirement to establish controls. As such, this revision includes
- A requirement for all affiliates to be diligent and PEPs/sanctions checks should also be conducted wherever relevant.
 - A requirement for affiliates to comply relevant regulatory and legislative requirements including CAP's guidance on ensuring advertisements are obviously identifiable in order to promote consistency, all relevant affiliate ads should be clearly and prominently marked '#ad'.
 - A requirement for relevant affiliates to safer gambling related content on a regular basis with frequency to be pre-determined by the individual operator with whom that affiliate has an agreement.

62. Compliance with the above is expected to be managed by way of a contractual obligation to comply with a Code of Conduct for the affiliate party. Operators are expected to terminate contracts with affiliates who cannot/do not comply, preferably on a one strike and you're out rule.

COVERAGE OF THE CODE

63. This Industry Code is designed to apply to all forms of advertising and all sizes of gambling operator. As this is an industry code it cannot be made mandatory but it will set a benchmark against which operators' commitment to social responsibility will be measured. Its success depends on the gambling industry adhering to its provisions and the aim must be for all gambling operators to comply with it.

64. The gambling industry will look to the Gambling Commission to assist it wherever it is appropriate to do so in encouraging compliance with this code and this is provided for in its Licence Conditions and Codes of Practice. (<https://www.gamblingcommission.gov.uk/PDF/LCCP/Licence-conditionsand-codes-of-practice.pdf>) where Ordinary Code Provision 5.1.8 states that 'Licensees should also follow any relevant industry code of practice on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.'

65. The Industry Code therefore covers all forms of licensed gambling in Britain, including society lotteries. The current exception to this is the National Lottery whose licence does not carry the same requirement and which is presently excluded from the remit of the Industry Code.
66. Also, unless they portray or refer to gambling, the code does not apply to marketing communications for non-gaming events or facilities e.g. tenpin bowling or hotels that are in the same complex as, but separate from, gambling events or facilities.

TELEVISION ADVERTISING – TEXT AND SUBTITLING

44. The first edition of the Industry Code was silent on the size and prominence of safer gambling messaging on television. It is now a requirement that the messaging in advertising follows the good practice set out in the ASA guidance. On-screen text and subtitling in television advertisements. Copies can be downloaded from: <http://www.cap.org.uk/Advice-Training-on-the-rules/help-Notes/Onscreen-text-and-subtitling-in-TV-advertisements-note1.aspx#VOH5Pm5nZY>

RADIO - MESSAGING

45. Radio advertising raises slightly different practical issues to television advertising. However, the Industry Code makes it a requirement for advertisers to include (i) a brief safer gambling message of the kind described in paragraph 22 above; or (ii) a voiceover at the end which will refer listeners to www.gambleaware.org

Responsible Marketing Code for Sports Wagering

1. Respecting the Legal Age for Sports Wagering

- No sports betting message should be designed to appeal primarily to those below 21 – the prevailing legal age for sports wagering.
- Advertising should not depict cartoon characters or feature entertainers, athletes, influencers or music that appeal primarily to audiences below the age of 21.
- Models, actors, influencers, athletes and entertainers appearing in advertising should be a minimum of 21 years old, substantiated by proper identification.
- No message should suggest or imply that underage persons engage in sports wagering.
- Sports wagering advertising and marketing should be placed in broadcast, cable, radio, print or digital communication (e.g., social media, SMS, websites, streaming) only where at least 73.6 percent of the audience is reasonably expected to be 21 years or older (determined by using reliable, up-to-date audience composition data).¹
- No sports wagering messages—including logos, trademarks or brand names—should be used or licensed for use on clothing, toys, games or game equipment intended primarily for persons below 21.
- To the extent that promotional products carry sports wagering messages or brand information, AGA members and the employees will use commercially-reasonable efforts to distribute them only to those 21 years of age or older.

2. Limiting College and University Advertising

- Sports wagering should not be promoted or advertised in college or university-owned news assets (e.g., school newspapers, radio or television broadcasts, etc.) or advertised on college or university campuses.
- Partnerships with colleges or universities should not include any component that promotes, markets or advertises sports wagering activity. This prohibition does not apply to alumni networks or content that is exclusively focused on responsible gaming education or problem gambling awareness.
- Sportsbooks should not enter name, image and likeness (NIL) endorsements or partnerships with amateur athletes.²

3. Supporting Responsible Gaming

- Each message will contain a conspicuous responsible gaming message along with a toll-free helpline number, where practical.
- Messages will not promote irresponsible participation in sports wagering.
- No message should suggest that social, financial or personal success is guaranteed.
- No message should suggest engaging in sports wagering is without risk or utilize “risk free” language.
- No message should encourage players to chase their losses or suggest that betting is a means of solving financial problems.
- No message should imply or suggest any illegal activity of any kind.
- Messages should adhere to contemporary standards of good taste that apply to all commercial messaging, as suits the medium or context of the message.

4. Controlling Digital Media & Websites

- Operator-controlled messages placed in digital media—including third party internet and mobile sites, affiliate platforms, commercial marketing emails or text messages, social media sites and downloadable content—shall comply with all applicable provisions of this Code concerning the content of such messages.
- Owned websites and apps that offer sports wagering should include a responsible gaming message and a link to a site that provides information about responsible gaming and responsible gaming services.
- Owned websites or profiles that include sports betting content, including social media pages and sites, shall include a reminder of the legal age for sports wagering.
- Age affirmation mechanisms, utilizing month, day and year of birth, will apply before a user can gain access to any page where individuals can engage in gambling.
- Owned websites will include geolocation mechanisms on those pages where individuals can engage in gambling, in order to restrict access only to those wagering within a legal jurisdiction.
- User-generated content on an owned site or web page will be monitored and moderated on a regular basis for compliance with the provisions of this code.
- Digital marketing communications will respect user privacy and comply with all applicable legal privacy requirements including those governing consent. All such messages targeting an individual recipient will be clearly identified as originating from the sports betting operator or otherwise attributable to the operator. In addition, each such message sent via email or text message will provide the option therein of opting out or unsubscribing.
- Owned websites shall disclose to users—in their terms of use or other policy statements—any practices of the website that involve sharing user information with third parties unrelated to the operator sponsoring the site.

Marketing regulations observed in our study:

- A.** No sports betting message should be designed to appeal primarily to those below 21 – the prevailing legal age for sports wagering. (AGA)
- B.** Advertising should not depict cartoon characters or feature entertainers, athletes, influencers or music that appeal primarily to audiences below the age of 21. (AGA)
- C.** Each message will contain a conspicuous responsible gaming message along with a toll-free helpline number, where practical. (AGA)
- D.** Section 5 of the FTC act prohibits “unfair or deceptive acts or practices in or affecting commerce”. (FTC)

RESULTS

- 1,663 ads recorded by four brands
- During one week in July 2024
- 237 per day
- 1,353 were “organic”
- 310 were “paid-for”
- Content marketing accounted for 52%



Paid-for Ads

71%

71% of paid-for ads included monetary incentives such as deposit matches or sign-up bonuses, with incentives ranging from \$250 to \$50,000.

71% OF PAID-FOR ADS OFFERED MONETARY INCENTIVES



BetMGM Sponsored
Library ID: 892659112684891

Step up to the plate with BetMGM's First Bet Offer! If you lose your first wager, you'll get your stake back in Bonus Bets, up to \$1,500. 🎮💰

THE KING OF SPORTSBOOKS THE KING OF SPORTSBOOKS THE

BETMGM OFFICIAL SPORTS BETTING PARTNER OF MLB

FIRST BET OFFER
GET UP TO **\$1,500 PAID BACK**
IN BONUS BETS*, IF YOU DON'T WIN

*BONUS BETS EXPIRE IN 7 DAYS. ONE NEW CUSTOMER OFFER ONLY. ADD'L TERMS.
GAMBLING PROBLEM? CALL 1-800-GAMBLER (AVAILABLE IN THE US). CALL 877-8-HOPENY OR TEXT HOPENY (467369) (NY). CALL 1-800-327-5050 (MA).

Get up to \$1,500 in Bonus Bets!

l-for

to the organic
for ads stuck
tions.

ESPN Bet

First Bet Reset

BetMGM

CALL 877-8-HOPENY OR TEXT HOPENY (467369) (NY). CALL 1-800-327-5050 (MA).

Get up to \$1,500 in Bonus Bets!

Organic Ads



BetMGM 🐵 🍀 @BetMGM · 30 Jul

Chris Getz in the White Sox front office getting ready to sell today

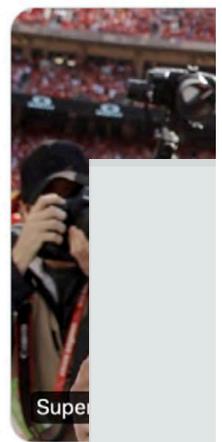


3 1 16 6.4K



BetMGM 🐵 🍀 @E

.@chaseakiddy has throughout the off



Super
From sp
2

es together



🔖 ⬆

What's going on here?

1,012 ORGANIC
ADS MAY BREACH
REGULATIONS



1,012

75% of organic ads (1,012) contained no responsible gaming messages or help hotlines, potentially breaching AGA advertising regulations.

ALL PAID-FOR
ADS COMPLIED WITH
AGA CODES



Paid-for Ads

In contrast to the organic ads, all paid-for ads stuck to the regulations.

What's going on here?

The big bet
Business

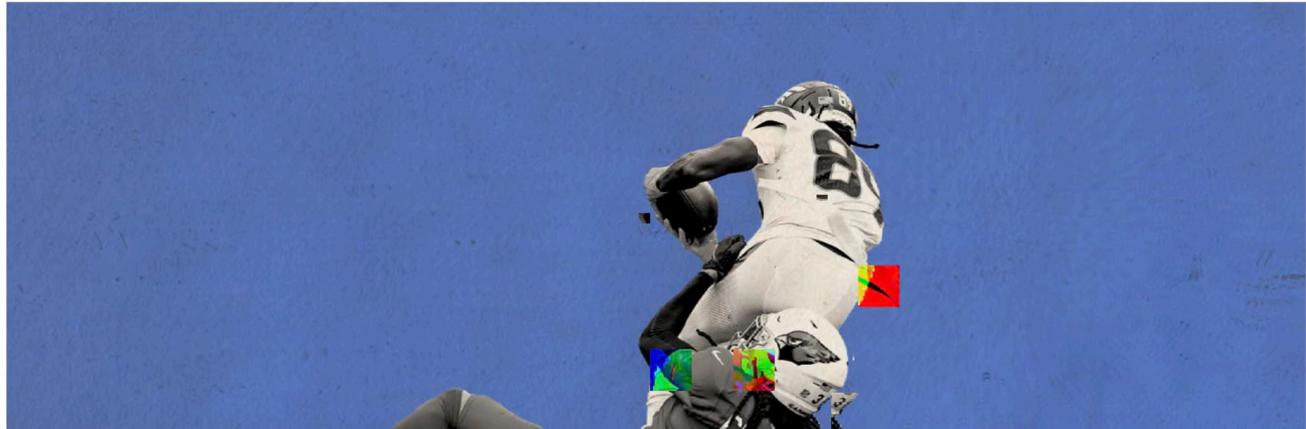
 This article is more than **10 months old**

US gambling sector's 'relentless' social media posts breached own rules, study claims

Callum Jones

Tue 3 Sep 2024 12.00 BST

 Share



What's going on here?

iGB

AGA hits back after study suggests leading US operators don't follow ad guidelines

6th September 2024 | By Kyle Goldsmith

The American Gaming Association (AGA) says a British study claiming US operators aren't following industry rules on responsible gaming messaging in advertising is an "irresponsible misinterpretation" of the facts.



Joe Maloney, AGA senior vice-president:

"Like companies across other industries, sports betting operators provide relevant, engaging content to customers designed to maintain brand awareness without promoting a specific offering that is covered by the code, like sports betting."

"To describe the sharing of sports facts, schedules or discussion topics via tweets and posts on social media platforms as advertising and thus applicable to our code is an irresponsible misinterpretation."

"This is no different from Gap or Banana Republic wanting to ask followers on social media platforms, 'It's fall right now, what are you wearing as the temperature cools?'"



Remit statement: 'content marketing' for gambling products

To ensure nothing falls between the gaps, the ASA and the Gambling Commission agree that:

- The ASA will continue to consider complaints about social media ads brought to its attention on a case-by-case basis in line with its existing approach to remit decisions.
- In the limited scenarios where complaints about operators' social media are deemed not to be within remit, the ASA will refer them to the Gambling Commission.
- The Commission will consider provisions under its Licence Conditions and Codes of Practice (LCCP), which sets out the rules for operators licensed to transact with consumers in Great Britain, and will consider taking action in line with its Statement of Licensing, Compliance and Enforcement policy.

effect of [being something](#), content that can reasonably be considered 'advertising' for various reasons, it can't regulate everything in the online space. One of the key exclusions – inspired in large part by the need to protect freedom of expression – is for editorial content.

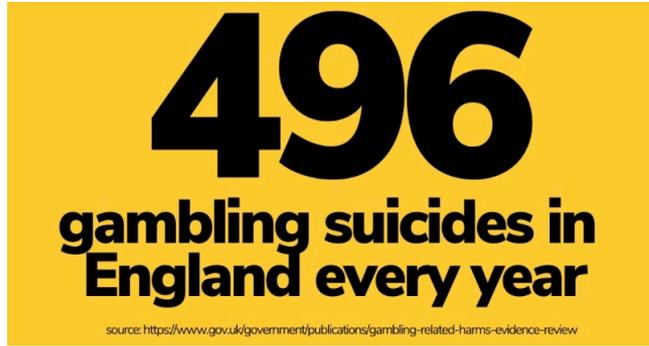
The vast majority of 'content marketing' is effectively deemed by the ASA to "sell something" and is, therefore, regulated under the CAP Code.

"Like companies across other industries, sports betting operators provide relevant, engaging content to customers designed to maintain brand awareness without promoting a specific offering that is covered by the code, like sports betting."

"the sharing of sports facts, discussion topics via tweets and social media platforms as advertising applicable to our code is an misinterpretation."

different from Gap or Banana branding to ask followers on social media platforms, 'It's fall right now, what are you wearing as the temperature cools?'"

What's going on here?



Joe Maloney, AGA senior vice-president:

“Like companies across other industries, sports betting operators provide relevant, engaging content to customers designed to maintain brand awareness without promoting a specific offering that is covered by the code, like sports betting.”

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“This is no different from Gap or Banana Republic wanting to ask followers on social media platforms, ‘It’s fall right now, what are you wearing as the temperature cools?’”

Why does it matter?

- If we adopt the AGA's argument, then 1,000 of 1,600 ads are not governed by any regulations.
 - All Content Marketing ads, would then be outside the remit and could do whatever they want.
- ➔ Let's have a look at the evidence around gambling content marketing.

Appeal of Gambling Ads to Children



Appeal of Gambling Ads



Responsible Marketing Code for Sports Wagering

Respecting the Legal Age for Sports Wagering

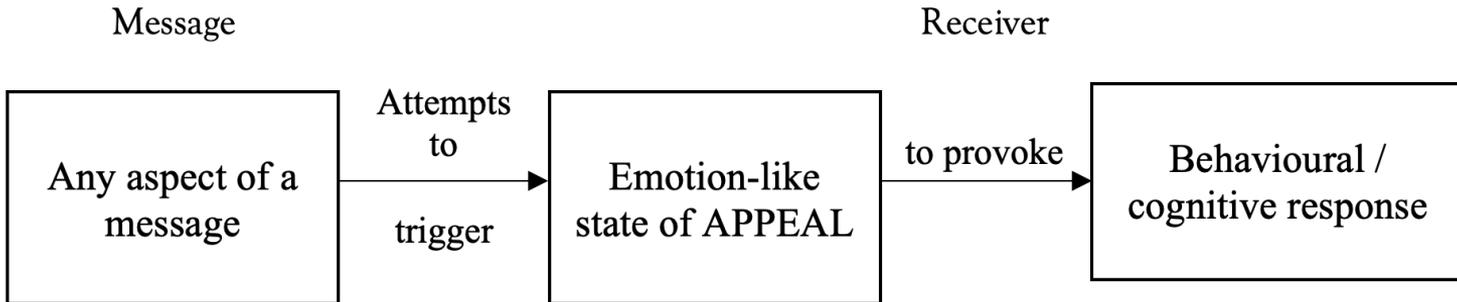
- No sports betting message should be designed to appeal primarily to those below the legal age for sports wagering by depicting cartoon characters or by featuring entertainers or music that appeal primarily to audiences below the legal age within the jurisdiction.² Nor should any message suggest or imply that underage persons engage in sports wagering.

The image shows a screenshot of a regulatory document. At the top, the logos for the American Gaming Association (ASA) and the Council on American Gambling (CAP) are displayed. Below the logos is a blue header with the text '16 Gambling' and 'CAP Code'. The main content area is light blue and contains the text: 'Marketing communications must not:', followed by the code '16.3.12', and then the requirement: 'be likely to be of particular appeal to children or young persons, especially by reflecting or being associated with youth culture'.

Appeal of Gambling Ads

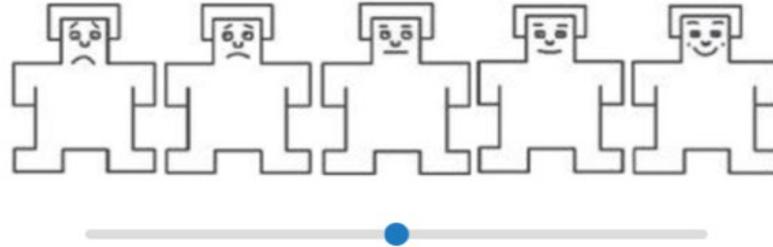
What is *appeal*?

- *Appeal is an **emotion-like internal state** in the receiver of a message. In marketing and advertising this response tends to be aimed at creating a sympathetic response towards a brand, service or product.*

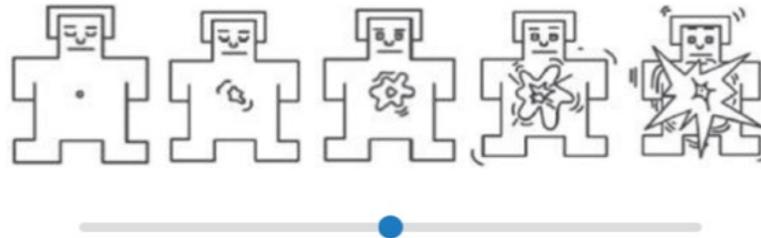


Appeal of Gambling Ads

Valence



Arousal



Appeal of Gambling Ads



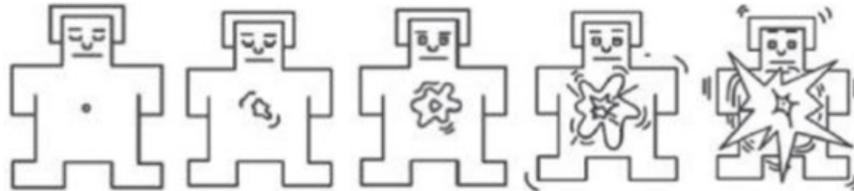
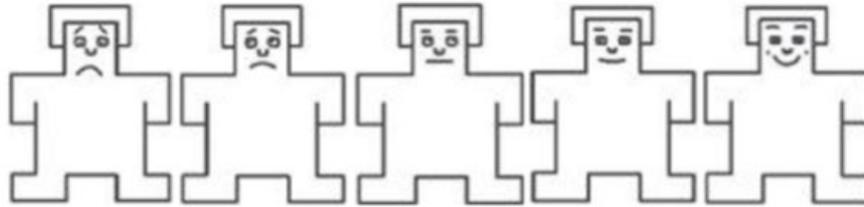
Click on the blue arrow if you're ready to rate the next slide!



Appeal of Gambling Ads



Appeal of Gambling Ads



Experiment



Bristol Hub for Gambling
Harms Research

Get ready to rate the post 1



Worldwide Offers

@WorldOffer



Go To This Website a lot of FREE MONEY ON IT- Free and Matched Bets Now [BetGinger.com](https://betginger.com) #redhead



Please rate post 1 now!

Get ready to rate the post 2



Unibet ✓
@unibet



Hummels v Mbappe

Close enough! 🤝



9:40 pm · 15 Jun 2021 · Twitter Web App

Please rate post 2 now!

Get ready to rate post 3



Paddy Power ✓
@paddypower



Morning all. It's Monday.



7:54 am · 18 Jul 2022 · Twitter for iPhone

7 Retweets 87 Likes

Please rate post 3 now!

Get ready to rate post 4



Midnite
@midnite

Check out our latest promotion to kick off the Call of Duty League

🎮🎮 Get up to £10 Money Back on your first losing live bet on any of the COD games this weekend 🎮🎮

Check out all the details of the promotion here - help.midnite.com/en/articles/36...

#CallofDuty #CallofDutyLeague 🏹



Please rate post 4 now!

Get ready to rate post 5



betway

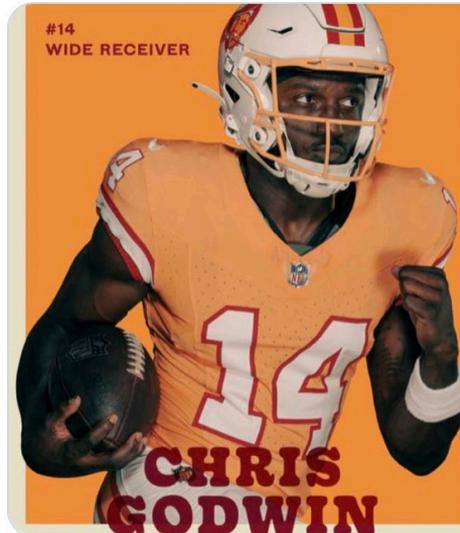
@betwayusa



Which team has the better throwback uniforms?

♥ Like for Buccaneers

🔄 Retweet for Titans



5:46 pm · 24 Jul 2023 · 260 Views

Please rate post 5 now!

Get ready to rate post 6



Tipico Sportsbook

@tipico



Why don't you swing some clubs while watching [#TheOpen](#) this weekend?

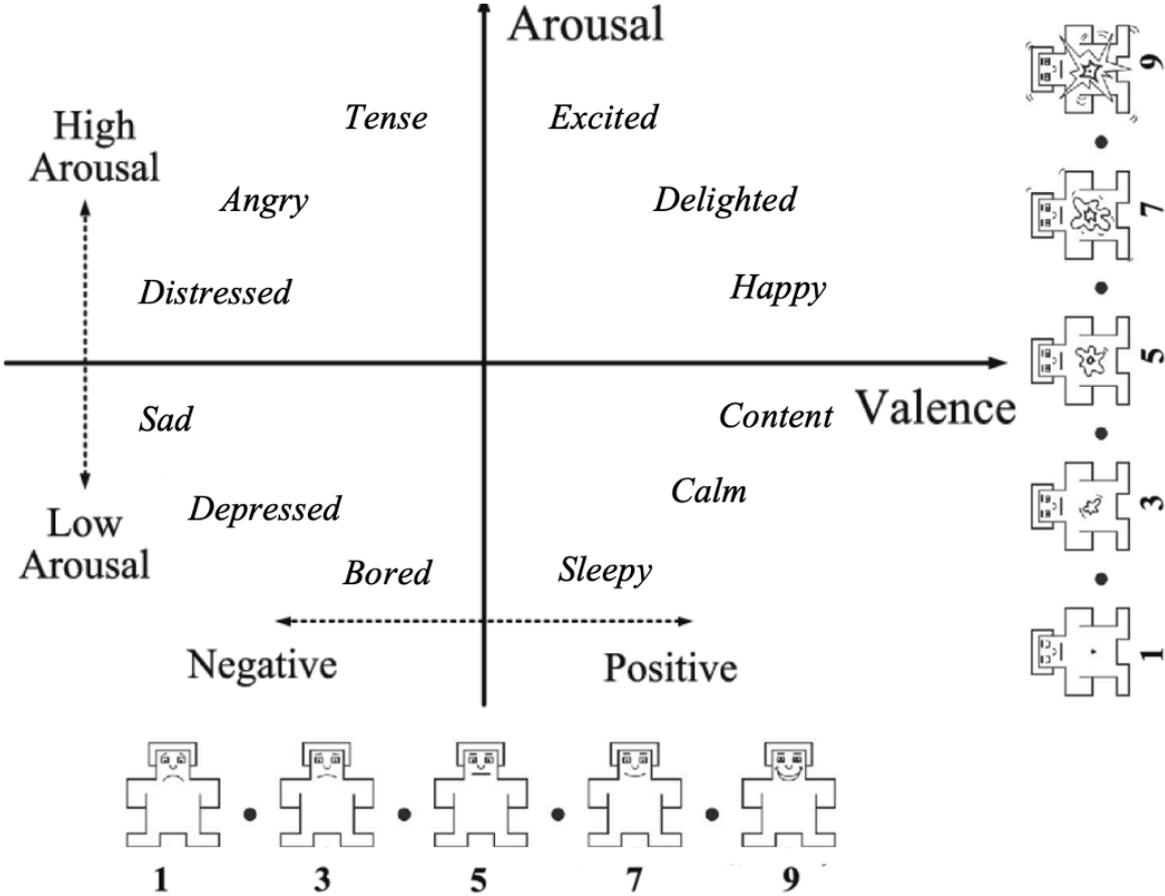
First-time depositors can get \$100 in bet credits + a \$50 Topgolf gift card on [#TipicoSportsbook!](#)

Click here to claim the offer now: tipi.co/TopGolf

The graphic features a golfer in a bright yellow shirt and grey cap, captured mid-swing against a dark red background. The golfer is wearing a white glove on their left hand. The Tipico Sportsbook logo is in the top left, and the TopGolf logo is in the top center. Below the logos, the text reads 'OFFICIAL SPORTS BETTING PARTNER OF TOPGOLF CLEVELAND'. The main offer is displayed in large, bold white and yellow text: 'GET \$100 IN BET CREDITS, + A \$50 TOPGOLF GIFT CARD'. At the bottom, there is a small disclaimer: 'Terms Apply. 21+ only. Bet with your head, not over it. Gambling problem? Call 1-800-GAMBLER (NJ, OH), 1-800-522-4700 (CO), 1-800-BETS-OFF (IA).'

Please rate post 6 now!

Let's analyse your results!



Appeal of Gambling Ads



210 Children
(11-17)



222 Young Persons
(18-24)



221 Adults
(24-78)



Total sample of 653 UK-based participants

Appeal of Gambling Ads



FreeBetsGlobal
@FreeBetsGlobal

#bet 10 get 30 freebets bit.ly/888FREEBETS
freebet #realmadrid #bara #ronaldo #messi acca #tips

888 sport

NEW CUSTOMER OFFER

Bet £10

Get £30

in Free Bets

BET NOW

GIF C's apply

18+

on	Gar
	tra
	a
	6
	6

PP Paddy Power
@paddypower

Very real prospect now of Chelsea missing the top 4 and relying on the Champions League final to get into the competition next year.

Great drama.

EXCELLENT!

GIF



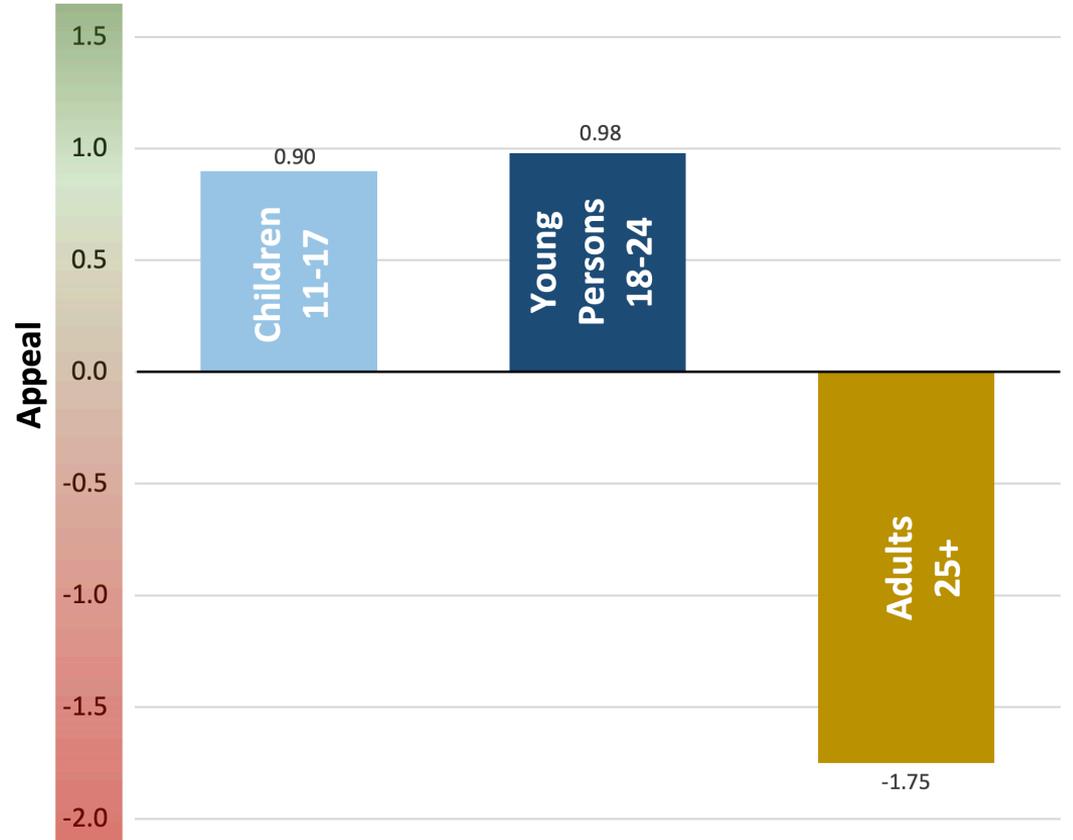
Appeal of Gambling Ads - Results

How often do you see gambling advertising on social media?

	Children (n=210)	Young Persons (n=222)	Adults (n=221)
Once/twice a day	53 (25.2%)	83 (37.3%)	61 (27.6%)
Once/twice a week	42 (20.0%)	78 (35.1%)	79 (35.7%)

Appeal of Gambling Ads - Results

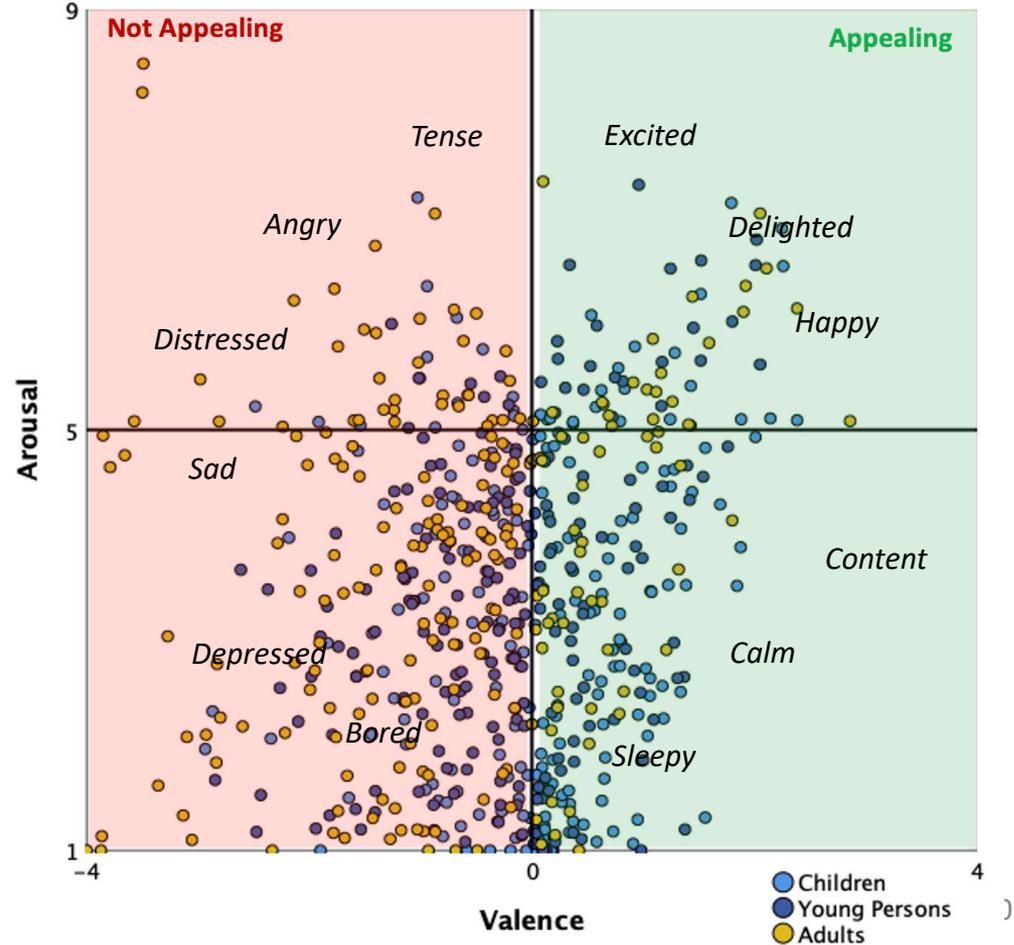
- **15 out of 24** gambling ads triggered positive emotions in children and young persons.
- Only **7 out of 24** gambling ads triggered positive emotions in adults.



Significance: $p < 0.001$

Emotions triggered by Gambling Ads

- Adults are **4-times** more likely than children and young persons to feel **strong negative** emotions.

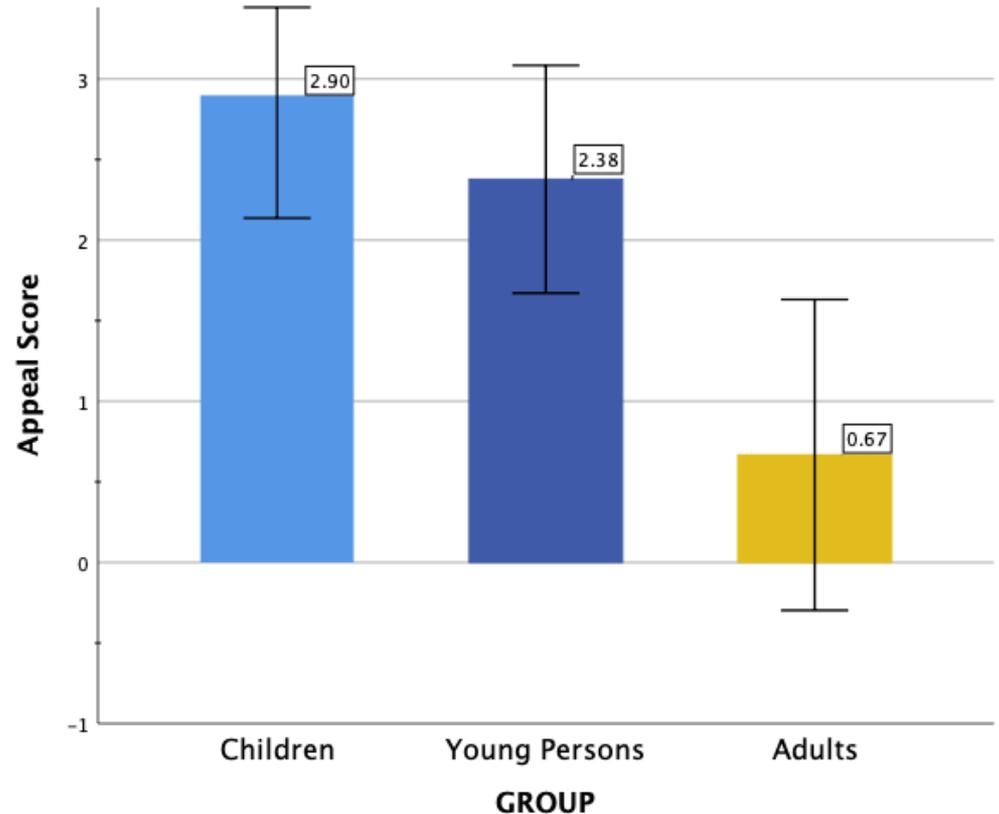


Appeal of Gambling Ads - Results

Format	Grand Mean	Children	Young Persons	Adults
Content Marketing by Traditional Gambling Accounts	2.236	2.391	2.255	2.068
Content Marketing by Esports Accounts	1.845	3.484	2.423	-0.320
Conventional Advertising by Esports Accounts	-1.762	-0.138	-0.553	-4.541
Conventional Advertising by Traditional Accounts	-1.977	-1.987	-0.473	-3.500

Appeal of Gambling Content Marketing

- Gambling Content Marketing is **3.9-times more appealing** to children and young persons than to adults.
- **11 out of 12** gambling content marketing ads were appealing to children and young persons – as opposed to **7** for adults.



Significance: $p < 0.001$

Recognizability of Gambling Ads



Advertising Literacy



2.1

Marketing communications must be obviously identifiable as such.



The Federal Trade Commission's Enforcement Policy Statement on Deceptively Formatted Advertisements explains that an advertisement is deceptive under Section 5 of the FTC Act if it materially misleads consumers as to its commercial nature or source. In other words, consumers should be able to recognize an ad as ar

Experiment



Bristol Hub for Gambling
Harms Research

Methodology



210 Children
(11-17)



222 Young Persons
(18-24)



221 Adults
(25-78)

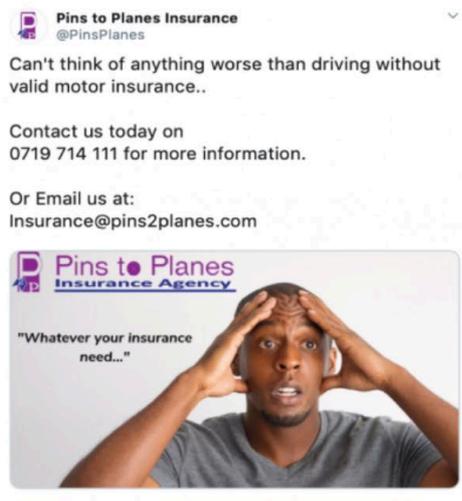


Total sample of 653 UK-based participants

Procedure

In the following task you will see a variety of screenshots taken from social media.

Your task is to decide whether the post is **“Advertising”** or **“Not Advertising”**.



Advertising



Not Advertising



Procedure



To help you making your decision, please have a look this definition of advertising:

Advertising is the activity of making products or services known about and persuade people to buy them.

You only have 6 seconds to make your decision before the screenshot disappears.

Materials

 **Janelle at home** :
@Janelle_at_home

Venus is moving into Gemini in a couple of hours where she'll be until August.

My word of advice: DON'T BE BORING.



Advertising

Not Advertising

Materials

 **TheAlexooo**
@AlexOntario_00

Treeflip [#skateboarding](#)



Advertising

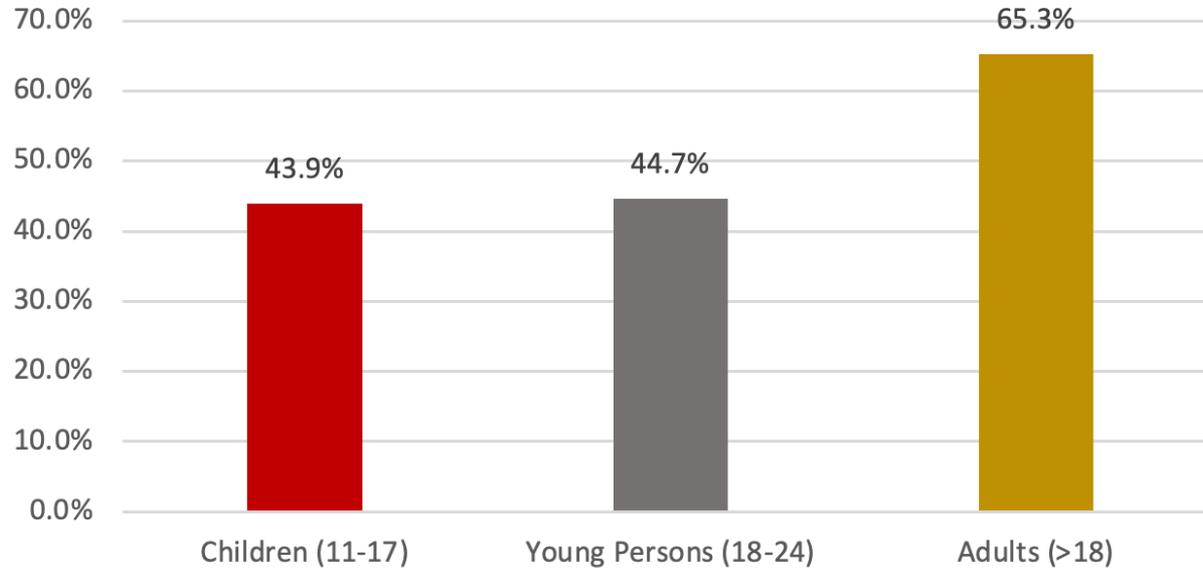


Not Advertising



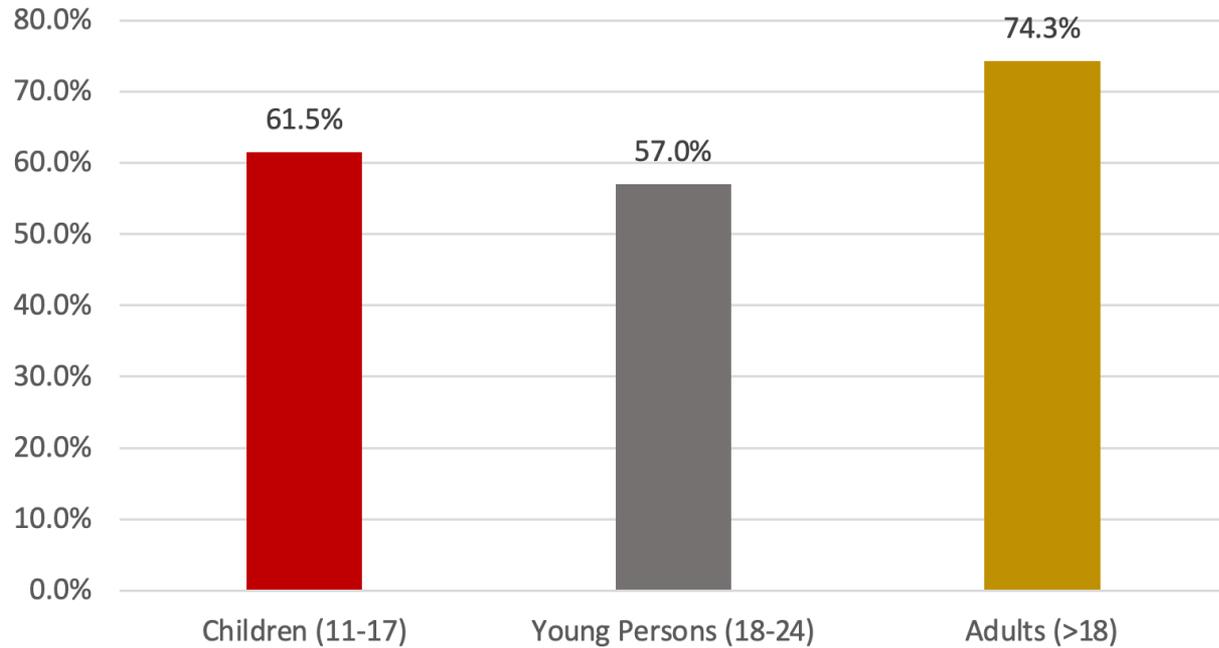
Results

Correctly classified Content Marketing (Gambling)

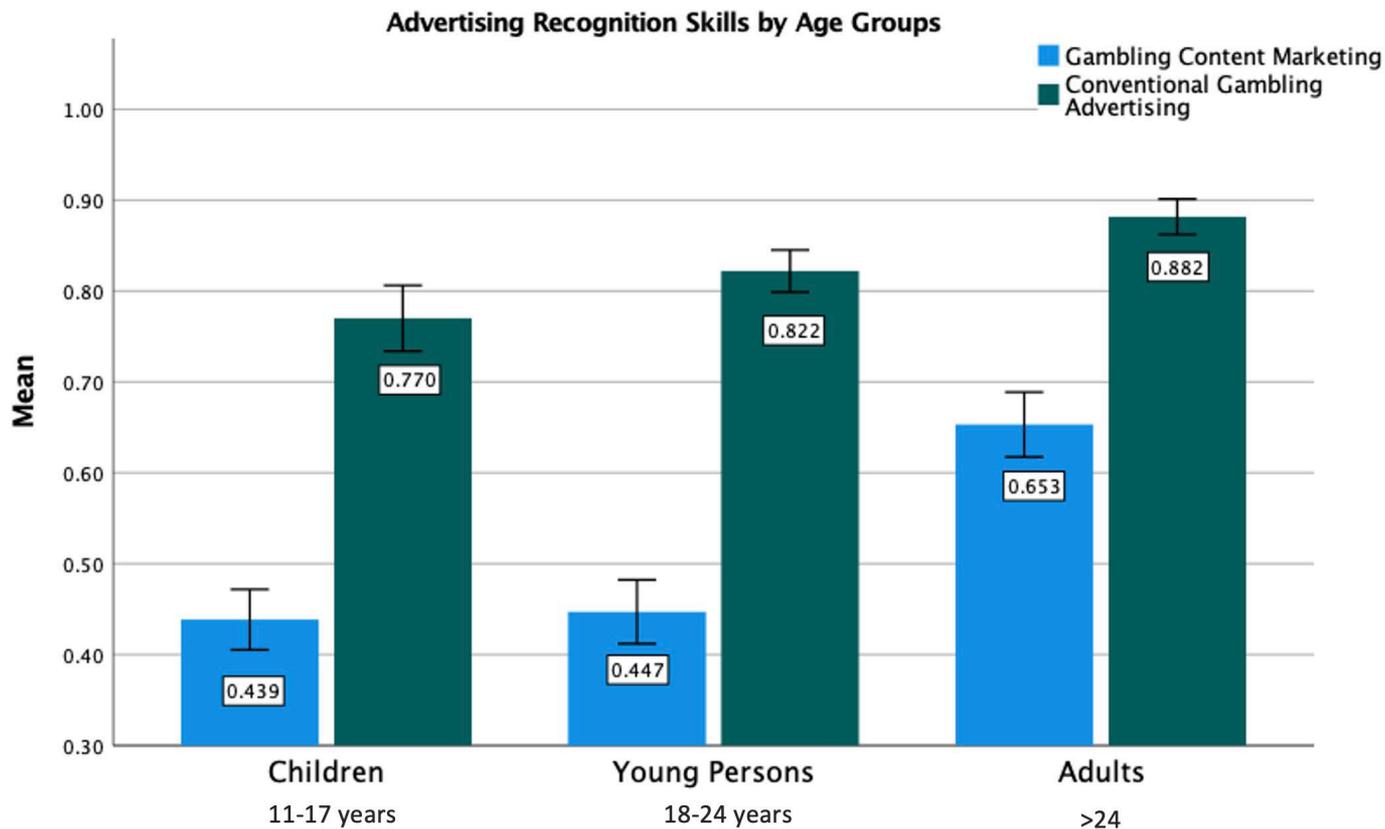


Results

Correctly classified Content Marketing (Insurances)

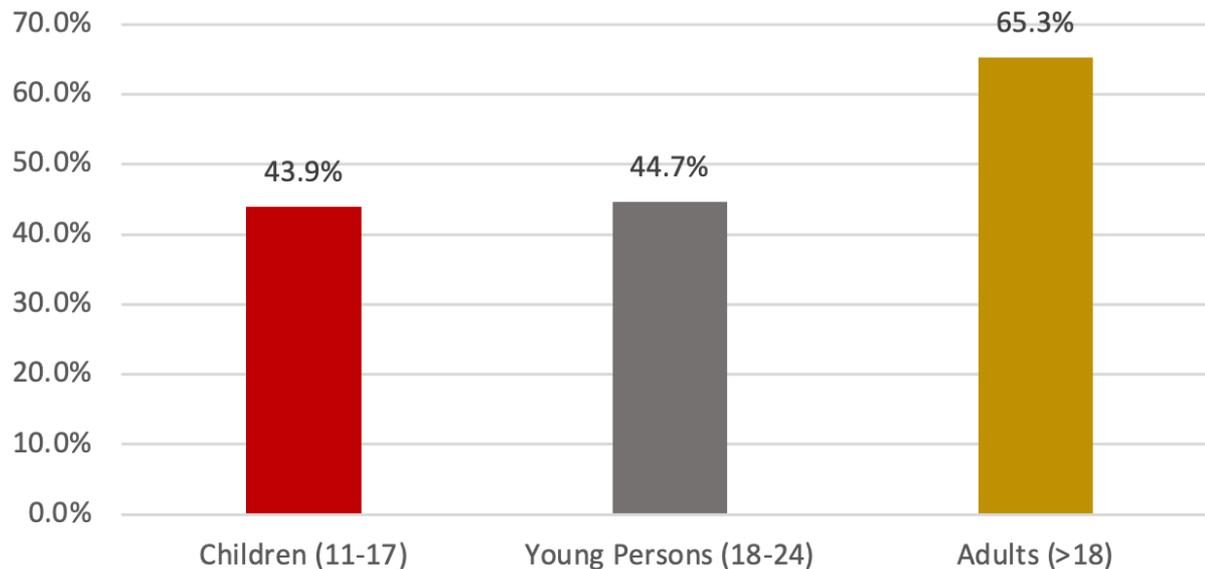


Results



Results

Correctly classified Content Marketing (Gambling)



Results



1. Gambling Content Marketing is very hard to recognise as advertising – for all age groups.
2. Insurance Content Marketing is also hard to recognise – but participants were much better here – especially children.
3. Content marketing was much harder to spot than conventional advertising
4. Children and young persons are similarly bad at recognizing content marketing as advertising

-> Content Marketing is really hard to recognise as advertising – meaning that advertising literacy protections may not be activated.

Implications

1. Content marketing bypasses protections, making them incredibly dangerous.
2. Potential explanation why content marketing is highly appealing to all age groups – but especially children.
3. Around 40% of all gambling ads on social media (ie content marketing) seems to be in breach of regulations.
4. Most self-reported exposure data might substantially underreport

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How often do you see gambling advertising on social media?			
Once/twice a day	25.2%	37.3%	27.6%
Once/twice a week	20.0%	35.1%	35.7%
Once/twice a month	16.1%	14.8%	12.6%
Once/twice a year	9.5%	4.5%	7.23%
Never	25.7%	8.1%	16.2%

Source: Rossi & Nairn, 2021



Impact of our
work





2 12

Sign in / Sign up



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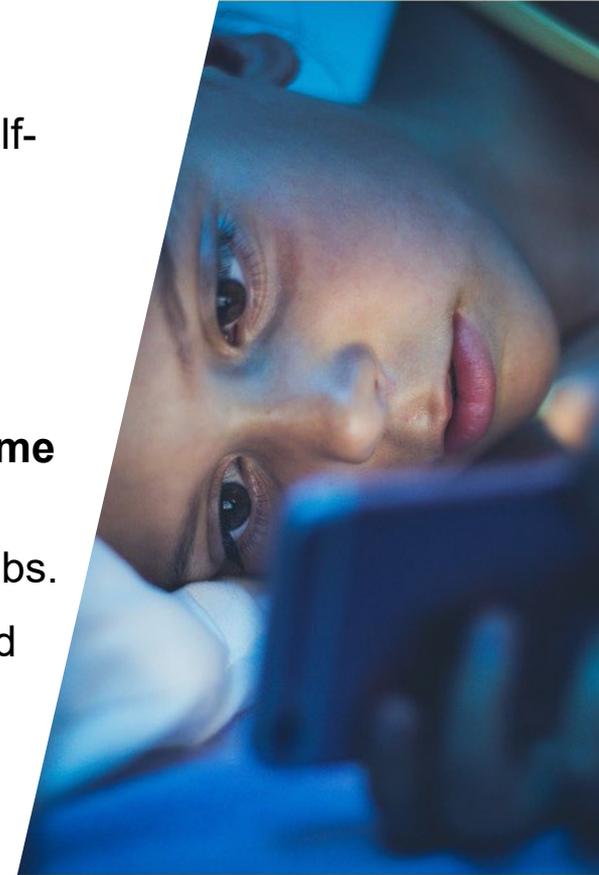
Remit statement: 'content marketing' for gambling products online

CAP News | 10

Our remit applies in the same way to advertising for all sectors, so the statement we published for gambling reflects how we'd approach content marketing from other industries such as alcohol brands or fast food chains. The vast majority of social media content from marketers is within our remit and therefore subject to our rules.

Recommendations

1. Gambling marketing should be legislated (and not industry self-regulation).
2. Ban gambling content marketing.
3. Development of specific online advertising regulations.
4. In the age of online advertising and huge expose via sponsorships, it is increasingly important to regulate the **volume of ads**.
5. Gambling sponsorship can create dependency of sporting clubs.
6. **International collaboration** of researchers, campaigners and regulators needed, to introduce effective ways of regulating.



Thank you for your attention.



University of
BRISTOL
Bristol Hub for Gambling
Harms Research

Dr Raffaello Rossi

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🐦 [@Raffaello_Ro](https://twitter.com/Raffaello_Ro)