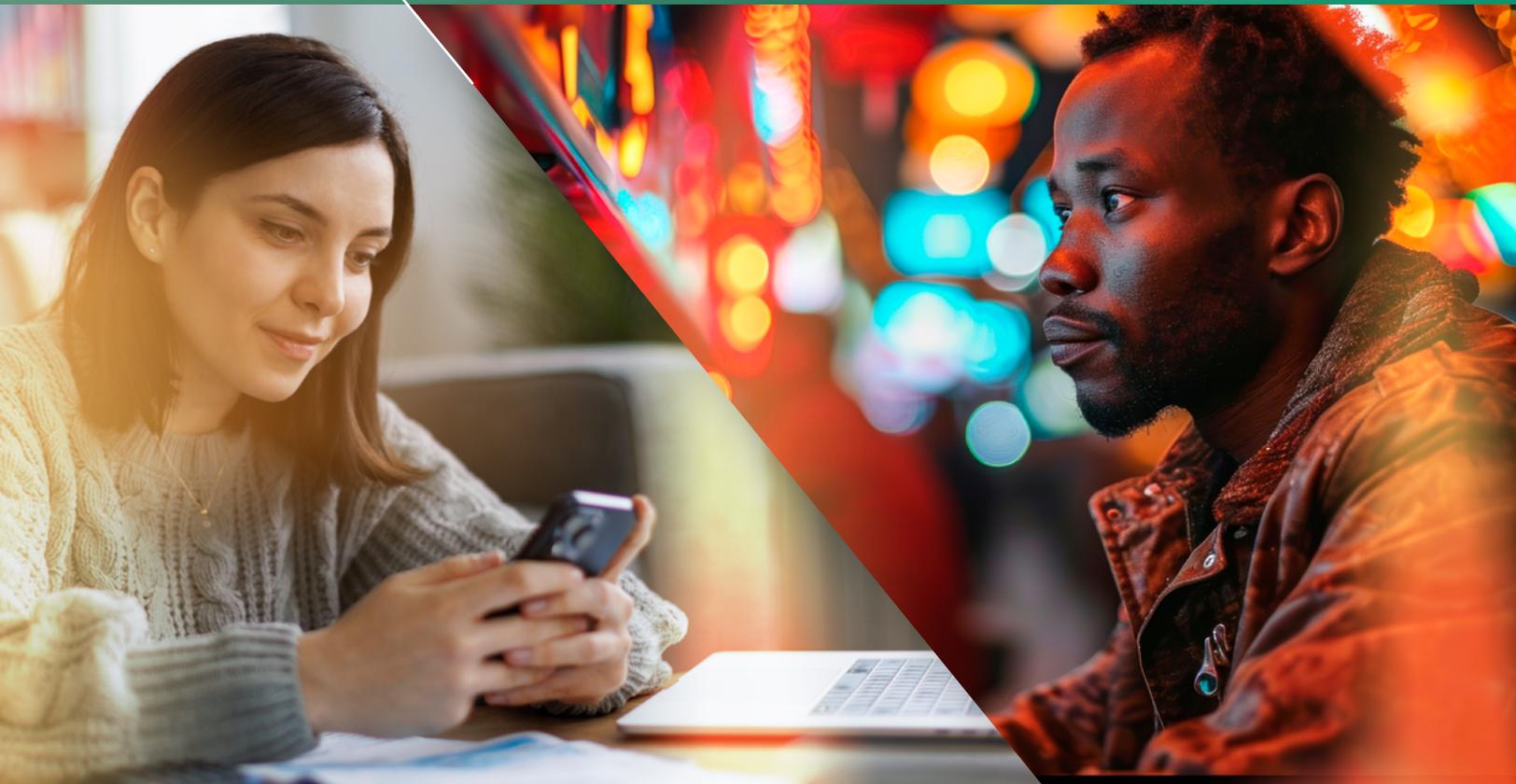


# Gambling Marketing & Advertising Report

January 2025



## Glossary

**Age-gating:** Process of restricting access to specific features or content on a website based on age. Age-gating is used to prevent individuals of certain ages, primarily minors, from engaging with material that may be unsuitable for them. Age-gating includes prompting users to confirm legal age or input their birth date before access.

**Diversity, Equity, & Inclusion (DEI):** DEI is the term used to describe these three closely linked values with the aim of promoting the representation and participation of various groups of people. Diversity refers to various representations, including the demographic characteristics that distinguish one individual from another. Equity refers to the concept of fairness in access, opportunity, and outcomes. Inclusion is the concept of building an environment in which all individuals feel welcomed and heard.

**Intersectionality:** The human experiences of privilege and oppression as shaped by their interacting and overlapping social identities such as race, class, and gender.<sup>1</sup>

**Micro-targeting:** A marketing strategy that uses consumer and demographic data to identify interests and preferences of individuals or small groups for the purpose of delivering ads that align to their interests and behaviours.

**Vulnerable Population:** Population groups that may be at greater risk of poor physical, psychological or social health due to disparities in characteristics such as age, gender, sexual identity, disability, socioeconomic status, religion or race.<sup>2</sup> This report uses the term “vulnerable population” to align with current regulatory language and frameworks. However, it is important to recognize that this terminology may inadvertently carry connotations that some communities perceive as stigmatizing, marginalizing, or offensive. Such language can unintentionally emphasize deficits or dependence rather than resilience, agency or capacity.



## Executive Summary

Key recommendations that emerged from a 3-phase project on gambling marketing and advertising (GMA) are presented in this report. Phase 1, a scoping exercise, and Phase 2, which further refined the findings from Phase 1 in two case study jurisdictions (Ontario and New Jersey), informed the key recommendations in this report. The findings from the Phase 1 report identified six major areas of concern—volume of GMA, control over direct marketing, axes of vulnerability, micro-targeting, online marketing, and influencers— and helped develop the best and better practice (BBP) framework. Phase 2 further developed, field tested and benchmarked the BBP framework as well as the operator roadmap and benchmarking tools. The findings from Phase 1 and Phase 2 were leveraged to inform policy recommendations addressing key areas.

This final report has recommendations for multiple stakeholder groups including regulators, operators, and researchers.

### Recommendations for Regulators

#### Minors

- Regulators should require operators to spend a certain amount of their GMA budgeting towards developing responsible gambling (RG) messaging aimed at consumer education and prevention campaigns for youth and young adults.
- Given the pace at which GMA has been expanding, current regulations around minors need to be critically reevaluated, on a yearly basis, to ensure that they are up-to-date and in line with new and emerging GMA.

#### Micro-Targeting

- Explicit regulations prohibiting micro-targeting of vulnerable populations are necessary.

***“[The GMA includes] recommendations for multiple stakeholder groups including regulators, operators, and researchers.”***

## Executive Summary

- Regulations should be introduced that ensure individuals are able to opt-out of consumer data collection practices and that these opt-out options are more easily identifiable.

### Diversity, Equity, and Inclusion

- Operationalize the prohibition of GMA practices that will unduly target vulnerable populations.
- Revise and update regulatory policy in lockstep with science-based evidence on GMA impacts on vulnerable populations.

### Intersectionality

- Regulations prohibiting sexualized images and sexualization of female and male bodies in GMA is necessary.
- The definition of vulnerable populations should be guided by current academic evidence while ensuring that regulatory standards do not further stigmatize these communities.

### Gambling Marketing and Advertising Ban

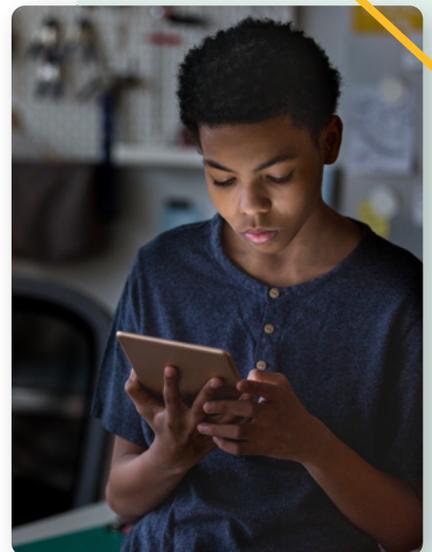
- Regulations defining GMA volume should be informed by methodologically sound research evidence.
- Regulators considering complete GMA bans should consult evaluation studies on the impact of complete GMA bans in jurisdictions like Italy.

## Recommendations for Operators

### Minors

- Operators must age gate social media GMA to prevent exposure to underage individuals.
- Cartoons, licensed characters, and influencers should only appear in GMA, where the majority of the audience is reasonably expected to be of legal gambling age.

*“Regulations defining GMA volume should be informed by methodologically sound research evidence.”*



## Executive Summary

- GMA that uses animated characters and motifs should aim to use muted colors and motifs that are less attractive to minors.
- When advertising in venues where there is a possibility of the presence of minors, messaging must balance gambling risks, improve financial literacy, address the illusion of control, and reduce glamorization.

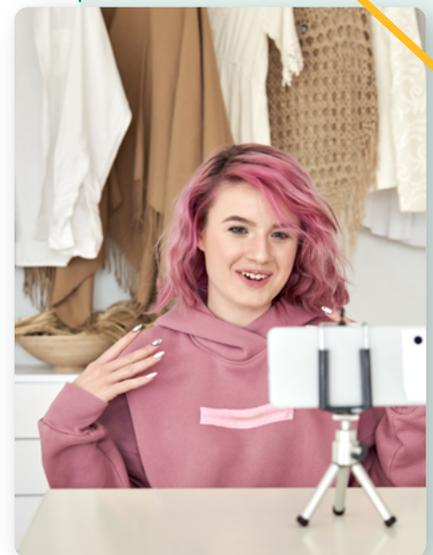
### Micro-Targeting

- Operators should transparently disclose when and where they are engaging in micro-targeting practices. Such disclosures should include (but are not limited to) disclosure statements on their websites that indicate when and what consumer data is being collected for marketing purposes.
- Operators should provide more choice to consumers regarding what consumer and demographic data they choose to share.
- Operators, in collaboration with media experts and RG organizations, should use micro-targeting data to identify harm reduction opportunities, such as disseminating RG messaging for vulnerable populations.

### Influencer Marketing

- Influencer terms and conditions should be codified in both GMA marketing codes and influencer contracts to ensure alignment with responsible marketing objectives.
- Operators should ensure they complete appropriate due diligence on influencers to ensure that they are only working with influencers who are associated with legal and regulated operators.
- Operators need to select and ensure that they work with social media influencers whose primary target audience is above the legal age to gamble, i.e. operators should not engage with social media influencers if the majority of the social media influencer's audience (i.e., 51% or more) is under the legal age to gamble or if influencer's content is primarily directed towards minors.

***“Operators should not engage with influencers if the majority of [their] audience is under the legal age to gamble.”***



### Diversity, Equity, and Inclusion

- GMA, particularly RG advertising, should promote fairness, accessibility, and ethical practices by being inclusive of demographic factors like ethnicity, sex, and disability, while avoiding undue focus on vulnerable populations.
- RG messaging development should be culturally sensitive and designed to address the unique beliefs and values of different ethnocultural populations.
- Representation of ethnic communities in GMA should be done in good faith and ensure that vulnerable populations, that might be susceptible to gambling and gambling harms, are not targeted.
- For certain vulnerable populations, cultural celebrations are periods of increased gambling activity, requiring careful consideration in GMA campaigns. To mitigate potential harms, these campaigns should incorporate RG messaging, such as reminders to gamble within limits, to promote responsible behavior and reduce gambling-related risks.
- Operators should work with culturally competent consulting organizations and DEI trained researchers to ensure that DEI implementations in GMA are conducted with a trauma-informed harm minimization focus.

### Gambling Marketing and Advertising Ban

- Operators should strive to provide additional public education messaging on tools and regulations that are in place to effectively manage GMA exposure.
- Operators need to inform regulators about market forces and work with regulators to ensure that regulations around GMA are not excessive and result in anti-competitive market practices.



### Gambling Marketing and Advertising Best Practices

- Operators need to critically evaluate current regulatory practices in GMA and see where they can exceed minimum regulatory standards. For increased transparency and consumer trust, operators should consider an external evaluation of their current regulatory practices.
- Where possible, operators should aim to be more transparent about GMA practices, such as around micro-targeting (see recommendations above); providing accounting of the amount of GMA and RG messaging that is being disseminated; and implementing more DEI practices (see recommendations above).
- GMA practices should focus on sustainable and ethical business practices that will ultimately result in increased player attraction and retention.

### Recommendations for Researchers

#### Micro-Targeting

- Research examining the impact of gambling-specific micro-targeting is necessary. Research should aim to explore gambling harms associated with micro-targeting; whether vulnerable populations are being micro-targeted at disproportionate rates; what individual characteristics are being used to implement micro-targeting practices in the gambling industry, and what harm minimization processes are currently being used to protect vulnerable populations.

#### Influencer Marketing

- Future research should analyze operators' influencer contract documents to critically evaluate current terms and conditions to better understand current practices and identify areas for improvement.

#### Diversity, Equity, and Inclusion

- To enhance responsible gambling (RG) efforts, researchers should investigate how the intersectionality of sociodemographic characteristics influences both the behavioral impacts of gambling marketing and advertising (GMA) and individuals' perceptions of GMA.

*“GMA practices should focus on sustainable and ethical business practices.”*



### Intersectionality

- Research on the biopsychosocial factors and their association with GMA and gambling harms are necessary.
- Research should also aim to explore how intersecting social identities compound consumer vulnerabilities.

### Gambling Marketing and Advertising Ban

- Research should aim to explore the impact of complete GMA bans enacted in some jurisdictions, as well as the consumer and public perceptions and impacts related to appropriate volume and complete bans.
- This study provided a preliminary examination of public perceptions regarding the amount of gambling advertising during sporting events; however, more in-depth research is needed. This is important because GMA is highly prevalent in the gaming environment during such events, and young males, who make up a significant portion of the audience, is at higher risk.

### This final report is organized into the following sections:

1. Current regulations related to GMA across key jurisdictions, including two case study jurisdictions (i.e., Ontario and New Jersey).
2. Considerations for additional strategies and measures regarding gambling advertising for:
  - a) Regulators
  - b) Operators
  - c) Researchers
3. Key take-aways



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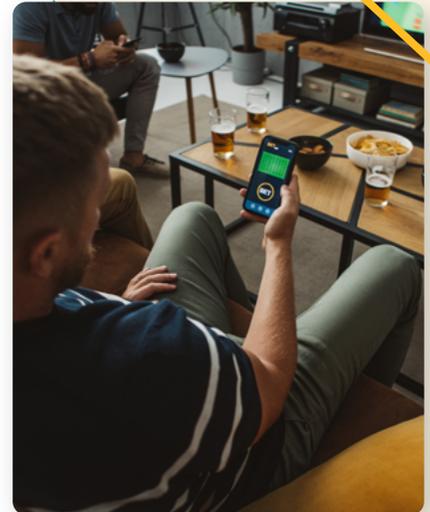
## Introduction

Gambling marketing and advertising (GMA) has expanded as rapidly as the evolution of gambling itself, coinciding with the changes in GMA legislations as well as expansion of GMA delivery methods.<sup>3</sup> The rise in GMA can be attributed to the expansion of GMA from predominant use of mass media, such as radio, television, and billboards, to the inclusion of consumer marketing (i.e., target the most likely consumers) and stealth marketing (i.e., blending messages into everyday experiences to be discovered organically).<sup>3,4</sup> With the expansion of GMA, there has been an increasing need to critically examine the impacts.

Research on the impacts of GMA has highlighted that increased exposure to GMA can normalize the act of gambling, which in turn can increase positive perceptions of gambling among the public, while also decreasing the understanding of overall risk involved with gambling.<sup>3,5</sup> In fact, studies have indicated that exposure to advertising not only normalizes the activity, but can also result in greater intention to gamble, increased gambling engagement,<sup>6,7</sup> and lead to more gambling related harms.<sup>5</sup> Greater risk of gambling related harms is of particular concern among vulnerable populations including youth and gamblers with a history of risky engagement.<sup>8-10</sup> Amongst youth, exposure to GMA has been linked to increased gambling frequency and riskier behaviors.<sup>10</sup>

***“Responsible gambling regulations must evolve faster than the industries they govern.”***

Due to the pervasiveness of GMA, there has been a call to action for regulators to place more stringent standards on marketing and advertising for not only the act of gambling, but also for elements such as brand awareness, incentives, and the use of celebrities to build brand recognition.<sup>5,11</sup> Some regulators have already begun to make changes to their existing approaches to marketing and advertising. However, there is concern that these changes are not founded in an evidence-informed best practice but rather, are a reactionary response.



## Introduction

With the lack of research into the expansion of GMA, regulators may struggle to develop evidence-informed regulatory measures. Regulators must ensure that polices help mitigate gambling harms yet remain relevant in a fiercely competitive market.<sup>12</sup> Striking a balance between socially responsible consumer protections and enabling legitimate operators to offer quality entertainment can be challenging; especially, with a lack of a standardized regulatory framework across different jurisdictions.

To help address these concerns an exploratory 3-phase project on GMA was developed. Phase 1 of the project synthesized all available evidence on socially responsible GMA to form a clearer understanding of what consumer protection regulations, that do not unduly restrict operators, look like. Phase 1 findings informed the development of a best and better practice (BBP) framework (See Figure 1) which was then refined during Phase 2. In Phase 2, the BBP framework was further refined through field testing, and the development of operator roadmaps and benchmarking tools was undertaken. The third and final phase of this project, as detailed in this final report, aimed to provide policy recommendations addressing key operating environments.

*“Regulators must ensure that polices help mitigate gambling harms.”*

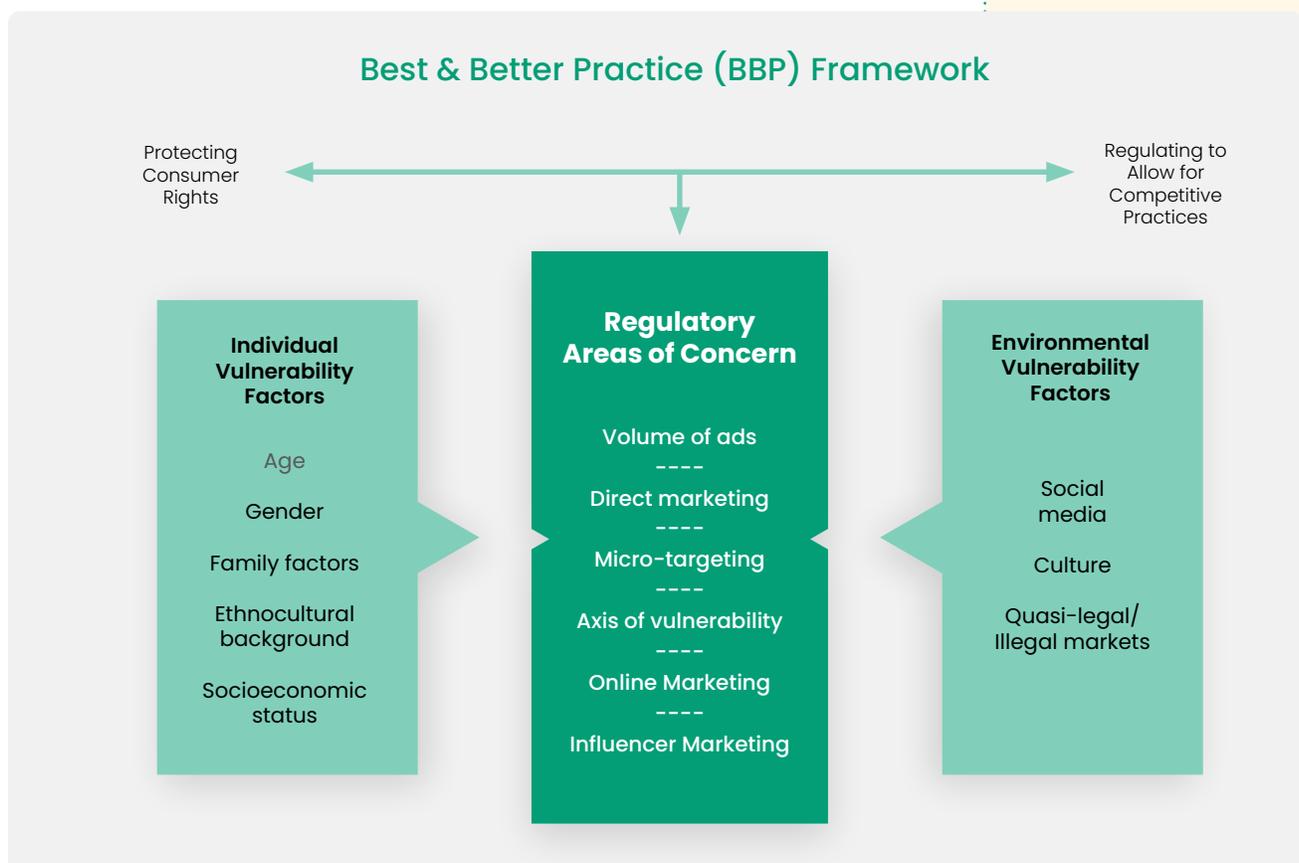


Figure 1: Best and Better Practice (BBP) Framework

## Research Approach

### Phase 1: Framework Development through Research and Synthesis

Phase 1 included both a jurisdictional scan and literature review, allowing for the synthesis of global trends in the practice of marketing and advertising relating to the promotion of gambling. The review identified a BBP framework that balances operator goals with strategies to prevent and minimize gambling harms.

#### Jurisdictional Scan

The international jurisdictional scan of regulatory standards and operational marketing and advertising practices consisted of document reviews and key-informant interviews. A rapid search of online websites was conducted to identify grey literature around GMA standards in various international jurisdictions. This search was performed using an internet search engine (Google) as well as targeted searches of regulators' and operators' websites. One-on-one interviews with eight key-informants, who were identified through the document scan and literature review, were conducted to draw insights on current marketing and advertising practices, industry recognized best practices, and areas that need improvement. Participants included a cross-section of stakeholders (i.e., regulators, operators, RG experts, gaming associations, and consultants) from multiple jurisdictions, including USA, UK, and Australia. All interviews and documents were analyzed to identify key themes.

#### Literature Review

An initial rapid search of existing literature reviews on GMA was carried out on Web of Science followed by a second literature search. Searches were limited to articles that were peer-reviewed, had full-text available online, and were published in English within the past decade (since 2012). Literature was scanned in two phases: 1) collecting articles deemed within scope based on the title and abstracts of each article, and 2) filtering out out-of-scope articles based on keywords.

*“The review identified a BBP framework that balances operator goals with strategies to prevent and minimize gambling harms”*



### Phase 2: Best-Practice Framework Development, Field Testing and Benchmarking

Phase 2, focusing on two case study jurisdictions (i.e., Ontario and New Jersey), aimed to evaluate and refine the BBP framework, and to develop operator roadmap and benchmarking tools. The aims of Phase 2 were completed through: 1) a jurisdictional scan, 2) key-informant interviews, 3) content analysis of social media GMA in Ontario, and 4) an online panel survey.

#### Jurisdictional Scan

A rapid search using an internet search engine (Google) and targeted searches of regulators' websites were conducted to identify GMA standards in case study jurisdictions. Additionally, operators' internal GMA-related documents (hereafter referred to as marketing codes) were obtained through email request to operators who provide gambling services in Ontario and New Jersey. Regulatory documents and marketing codes were analyzed through qualitative constant-comparison analysis with themes informed by the jurisdictional regulations identified in Phase 1. The analysis identified similarities and differences in regulatory practices and operator implementation of regulatory standard requirements as well as operator policies and practices that go beyond minimum compliance.

#### Key-Informant Interviews

Regulators and operators from Ontario and New Jersey, identified during the Phase 2 scan, were invited to individual Zoom interviews. Five key-informants participated in the interviews. The transcribed interviews were analyzed thematically to identify core themes.

#### Content Analysis of Current Social Media Advertisements in Ontario

A sample of (n = 433) social media advertisements, consisting of social media messages and associated images, available in Ontario, between May 2022 and February 2023, were collected and critically analyzed for salient themes.

*“ The analysis identified similarities and differences in regulatory practices and operator implementation of regulatory standard requirements.”*

### Online Panel Survey

A survey was conducted with an online panel of 4,009 respondents, comprising 2,007 Ontarians and 2,002 New Jersey residents (see Appendix A). In the absence of a standardized measure, a survey was developed that prioritized face validity, ensuring the questions were directly relevant and comprehensible to the study's objectives. The survey aimed to explore public perceptions of GMA, as well as behaviours and intentions, such as engaging in positive play practices and intending to gamble with socially responsible operators.

While the findings of the survey may be applicable to other contexts and jurisdictions beyond the study's original setting, the generalizability is constrained by the influence of various contextual factors, which should be carefully considered when interpreting the results. Attitudes and perceptions of gambling marketing and advertising are shaped by cultural differences, individual experiences with gambling, and the socio-economic conditions of specific regions. Moreover, the marketing strategies used by gambling operators, such as ads perceived to target children or vulnerable groups, can elicit distinct reactions. These factors highlight that the findings of the survey are closely tied to the specific conditions and parameters of the research, limiting their applicability to broader populations or contexts.



### Phase 3: Policy Recommendations Addressing Key Operating Environments

Phase 3 drew on the global evidence synthesis undertaken in Phase 1 and 2 (See Figure 2 for jurisdictions included in Phase 1 and 2) to develop evidence-informed policy recommendations. These recommendations are designed to address various operating environments and reflect the best practices in GMA that protect consumers.



Figure 2: Phase 1 and Phase 2 jurisdictions.

#### This final report is organized into the following sections:

1. Current regulations related to GMA across key jurisdictions, including two case study jurisdictions (i.e., Ontario and New Jersey).
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***“[GMA] recommendations are designed to address various operating environments.”***

## Current Regulations Related To GMA Across Key Jurisdictions

The jurisdictional scan of regulatory standards around the globe, including the case study jurisdictions (i.e. Ontario and New Jersey), identified current regulatory practices (see Table 1). Regulations fall into two categories: content-related and administrative. Content-related regulations focus on regulations regarding targeted audiences, and the types of information and imagery that can be displayed on GMA. Administrative regulations cover the location, timing, and approval requirements for advertising, including possible complete bans.

*“Regulations fall into two categories: content-related and administrative.”*



*“Minors, self-excluded individuals, and vulnerable populations must remain out of marketers’ reach.”*

## Table 1: Regulatory Documents

Category	Subcategory	Definition	Jurisdictional Scan GMA	Ontario	New Jersey
<b>Content</b>					
	Vulnerable Populations	Focuses on GMA that specifically targets those considered to be vulnerable/higher-risk players, including players who are currently self-excluded. Some of the codes pertain to language around advertisements that may exploit vulnerable people.	✓	✓	✓
	Minors	Centres around minors (under 18 for lottery/ under 19 casino/online in Ontario, under 21 in New Jersey), contains elements such as the depiction of minors, or actors that appear to be minors, in marketing and advertisements and not using themes or language that appeal primarily to minors.	✓	✓	✓
	False & Misleading GMA	Requires that GMA must be truthful, understandable, and accurate in representing elements such as the odds and risks of gambling.	✓	✓	✓
	Aggressive Tactics	Pertains to use of threats, harassment and/or violence to encourage gambling in advertising and marketing. It also applies to marketing and advertising campaigns that imply urgency is required to avoid disappointment, or to pressure people to gamble.	✓		
	Help Resources	Relates to help information for those seeking aid with gambling related harms, including the display of helplines and other help resources.	✓	✓	✓
	Responsible Gambling	Pertains to responsible gambling or safer gambling language and messaging that needs to be, or should be, in advertisements and marketing material. This category covers all responsible gambling related measures that do not involve specifics on help on resources (e.g., messaging on taking a break).	✓	✓	✓
	Social Responsibility	Encompasses requirements around socially responsible advertising and marketing; e.g. not showcasing illegal gambling, having discriminatory elements, contain scenes of violence, or containing scenes of violence, or indecent/offensive material. This subtheme also contains provisions around highlighting gambling as entertainment. Social responsibility also consists of recommendations for online mechanisms, such as age verification and geolocation verification, to allow access only to those who are legally allowed to gamble.	✓	✓	✓

## Table 1: Regulatory Documents

Category	Subcategory	Definition	Jurisdictional Scan GMA	Ontario	New Jersey
<b>Content</b>					
	Social & Emotional Harm	Relates to themes that are prohibited in gambling and marketing advertising. Some of these include depicting gambling as a rite of passage or a way to increase personal attributes (attractiveness, toughness, etc.). Subtheme also prohibits framing gambling as a way to handle personal problems or as way to fulfil personal or social obligations.	✓	✓	
	Financial Responsibility	Prohibits gambling advertisements and marketing from being portrayed as a way to improve an individual's finances, as a substitute for employment, and as a way to recover an individual's losses.	✓	✓	
	Accountability	Mentions that licensed operators need to have their name and logo on advertising and marketing materials, and contains recommendations regarding the appearance of venues as maintained and well-kept. This category also relates to the operators' responsibility to review their advertising and marketing materials, and their responsibility if an advertisement violates the rules and regulations for advertising and marketing in their jurisdiction.	✓		
	Inducement	Relates to rules pertaining to, as well as the conditions that must be in place, for the promotion and advertisement of inducements, bonuses, and credits.	✓	✓	✓
	Celebrity Appearance	Applies to rules and restrictions for using celebrities in gambling and marketing advertising.	✓	✓	✓
	Event Recording	Pertains to filming or photographing the casino's gaming floor as well as jackpot or prize winners.			✓
	Diversity	Relates to reflecting the diversity of the jurisdiction.	✓		
	Substance Use	Refers to the use and display of alcohol and drugs in advertising and marketing, as well as the stipulations around complimentary liquor at land-based venues.	✓	✓	

## Table 1: Regulatory Documents

Category	Subcategory	Definition	Jurisdictional Scan GMA	Ontario	New Jersey
<b>Administrative</b>					
	Direct Marketing	Pertains to the types of patrons that can be contacted, how to contact these patrons (i.e., direct mail, email etc.), and how patrons can opt-out or -in to communications from the website/venue.	✓	✓	✓
	Placement of GMA	Details where marketing and advertising materials, such as billboards, logos, operator's website and print material, can be located.	✓	✓	✓
	Timing	Discusses when (i.e., what time and following certain events) gaming advertising and marketing can occur.	✓		
	Pre-Approval	Relates to advertising and marketing needing to be approved by the regulatory body before use. It also includes verbiage around certain organizations (e.g., universities and colleges) needing to pre-approve material for advertising.	✓		✓
	GMA Budget	Discusses that the budget for gambling advertising and marketing must be within a certain percentage of the licensed operator's revenue.	✓		
	Licensing	Pertains to operators needing to be licensed in the jurisdiction where they plan to promote their marketing and advertising campaigns.	✓		
	Affiliates	Relates to affiliate marketing, including how affiliates can market and advertise gambling-related products and operators.	✓	✓	✓
	GMA Bans	Discusses what marketing and advertising materials are banned in the jurisdiction, as well as DNS blocking of online gaming sites that are illegal or quasi-illegal.	✓		
	Conditions	Adherence to advertised prizes and how long advertising and marketing materials must be kept after use.		✓	✓
	Education & Training	Education for marketing and advertising teams to make sure all conditions and stipulations are adhered to, as well as employee training around advertising and marketing of sports wagering services. This category also involves suggestions around the education and training of media, marketing, and broadcast teams around the difference between legal and illegal operators and the implications of both.		✓	✓

## Considerations For Regulatory Measures Around Gambling Marketing And Advertising

Table 1 above shows existing GMA regulations across various jurisdictions, including the two case study jurisdictions. While current regulations are extensive, the scoping exercise in Phase 1 and Phase 2 identified the need for additional regulatory measures and operator marketing code guidelines.

The following section provides recommendations that address some key areas of concern. Recognizing the gaps in the current gambling literature, recommendations for research are also identified in the following section. The current recommendations focus on the regulatory areas related to: 1) minors, 2) micro-targeting, 3) influencer marketing, 4) DEI, 5) Intersectionality, 6) complete GMA bans, and 7) operator best practices.

### Minors: The Major Issue

Several systematic reviews raised concerns about minors' exposure to GMA<sup>3,14,15</sup> with a large number of minors being exposed to GMA through social media, TV, and sporting events.<sup>3,16-18</sup> Young people are more susceptible to financial incentives and cognitive biases<sup>5</sup> which may result in increased gambling harms. One study<sup>19</sup> found that social media advertisements for social casino gaming included elements that could appeal to younger audiences, such as cartoons, pop culture references, and sports. While research within the context of gambling for money is limited, research has shown that advertisements featuring cartoon characters and bright visuals are more likely to attract children and adolescents, as they mimic features designed for younger audiences, creating a strong appeal through familiarity and entertainment.<sup>20</sup> Similarly, a recent study found that young people viewed celebrities and social media influencers as enhancing the impact of gambling advertisements by making them more engaging and easier to remember.<sup>21</sup> Most jurisdictions included in the project, including Ontario and New Jersey, have stringent regulations to protect minors. These include regulations which prohibit GMA directed towards minors, portrayal of minors or actors that appear to be minors in GMA, and depicting cartoon or licensed characters (e.g., superheroes) that particularly appeal to minors. Critical content analysis showed that

*“Young people are more susceptible to financial incentives and cognitive biases which may result in increased gambling harms.”*



social media GMA in Ontario aligned with regulatory guidelines, with none of the ads reviewed depicting minors or licensed characters. However, regulations should be reviewed regularly to ensure that the current GMA does not unintentionally target minors. For example, a large portion of the current social media GMA (40%), in Ontario, included animated game characters that appear in the gambling games, or some animated elements. Other elements currently present in social media GMA that might be potentially attractive to minors include bright colors, motifs of sweets and candy, as well as celebrities, social media influencers, and athletes.<sup>19,22</sup> While the purpose of utilizing these motifs may not be to attract minors, it may result in the unintended consequence of appealing to them. While regulations are continuing to evolve (e.g., Ontario's recent ban of the use of athletes and celebrities in GMA), further considerations are necessary to ensure that current social media GMA is not inadvertently appealing to minors.

### Recommendations for Regulators

- Regulators should require operators to spend a certain amount of their GMA budgeting towards developing responsible gambling (RG) messaging aimed at consumer education and prevention campaigns for youth and young adults.
- Given the pace in which GMA has been expanding, current regulations around minors need to be critically reevaluated, on a yearly basis, to ensure that they are up-to-date and in line with new and emerging GMA.

### Recommendations for Operators

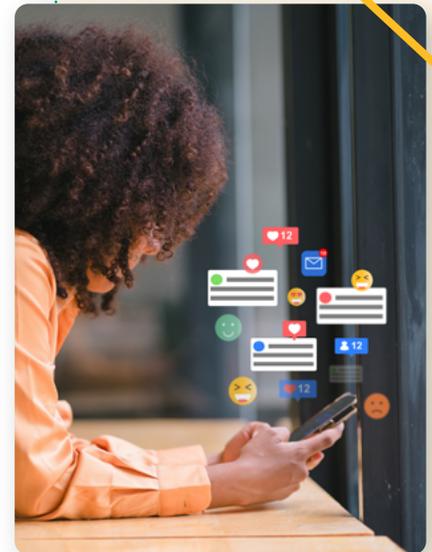
- Operators must age-gate social media GMA to prevent underage exposure to GMA via social media.
- Use of cartoons and licensed characters, animated game characters, and influencers (i.e., social media influencers, celebrities, and athletes) should be used only in GMA that is disseminated in areas where the majority of the audience is reasonably expected to be over the legal age to gamble.
- GMA that uses animated characters and motifs should aim to use muted colors and motifs that are less attractive to minors.
- When advertising in venues where there is a possibility of the presence of minors, messaging that balances the risks associated with gambling,

increases financial literacy, addresses the illusion of control, and tempers glamorization vs normalization are specifically required.

### The Macro Problem of Micro-Targeting

Micro-targeting uses consumer data to tailor ads to individuals or small groups based on their preferences and behaviours for the purpose of delivering ads that align to their interests and behaviours. It is used in many industries as a way to reach desired target audiences. However, there are unique harms associated with this practice in the gambling context that are not present within other industries. Unlike other industries that engage in microtargeting as a marketing strategy to sell product or services, such as clothing or technology, using micro-targeting as a media strategy, in the gambling industry, comes with an element of risk due to the mixed composition of the audience and has the potential to target higher risk populations and leads to a range of gambling-related harms, including addiction. While operators and regulators identified micro-targeting as an area of concern, there is also the perception that it is routine practice across all industries. In line with this perception, there is lack of regulations around micro-targeting. However, the online panel survey revealed that half (49.5%) of the respondents perceived micro-targeting to be an unethical practice and strongly agreed they would not utilize the services of gambling operators who engage in micro-targeting practices. These findings highlight the consumer concerns around micro-targeting practices.

Despite consumer concerns, the ethicality of micro-targeting in gambling largely depends on the intent, execution, and consequences of the practice. Micro-targeting as a marketing strategy may raise ethical concerns when used by the gambling industry, particularly if it targets vulnerable populations, promotes excessive gambling, or uses behavioral insights to unfairly influence people. Furthermore, these concerns are heightened due to the lack of transparency and clarity given that the understanding of the scope and use of micro-targeting in the gambling space is limited. When users are not fully aware that their personal data is being used for micro-targeted ads, or when data collection methods are not entirely clear, it can raise questions about informed consent and personal autonomy.



### Recommendations for Regulators

- Explicit regulations prohibiting micro-targeting of vulnerable populations are necessary.
- Regulations should be introduced that ensure individuals are able to opt-out of consumer data collection practices and that these opt-out options are more easily identifiable.

### Recommendations for Operators

- Operators should transparently disclose when and where they are engaging in micro-targeting practices. Such disclosures should include (but are not limited to) disclosure statements on their websites that indicate when and what consumer data is being collected for marketing purposes.
- Operators should give consumers more control over what personal and demographic data they share.
- Operators, in collaboration with media experts and RG organizations, should use micro-targeting data to identify harm reduction opportunities, such as disseminating RG messaging for vulnerable populations.

### Recommendations for Researchers

- Research examining the impact of gambling-specific micro-targeting is necessary. Research should aim to explore: gambling harms associated with micro-targeting; whether vulnerable populations are being micro-targeted at disproportionate rates; what individual characteristics are being used to implement micro-targeting practices in the gambling industry, and what harm minimization processes are currently being used to protect vulnerable populations.

### Influencing the Influencers

Influencer (i.e. social media influencers, celebrities, and athletes) marketing is a unique form of marketing. Influencer marketing has a high user engagement, and social media advertising via influencers might have a greater impact on intentions to gamble than operator advertisements.<sup>25</sup> Currently, influencer regulations are limited, with



most terms and conditions set by operators. A little more than a quarter (28%) of the participants in the online panel reported watching others gamble via social media. Similarly, around one-third (30%) of the online panel survey participants felt the use of celebrities and athletes made gambling websites seem more credible and made them want to gamble on a particular website. Influencer marketing has the unique opportunity for influencers to be located in jurisdictions that lack, or have limited, regulations specific to influencer GMA. Yet these influencer GMA's have an impact on players globally and can result in harm for players, especially under-age and young adult players. Analysis of internal marketing codes did not identify any guidelines for influencers. However the operators interviewed reported that influencer contracts contain prescribed terms and conditions.

### Recommendations for Operators

- Influencer terms and conditions need to be codified in GMA marketing codes and influencer contracts to ensure alignment with responsible marketing objectives.
- Operators must conduct due diligence to ensure influencers are affiliated with legal, regulated operators.
- Operators should avoid working with influencers whose content primarily targets minors.

### Recommendations for Researchers

- Future research should analyze operators' influencer contract documents to critically evaluate current terms and conditions to better understand current practices and identify areas for improvement.

### Walking the Fine Line with Diversity, Equity, and Inclusion (DEI)

Some jurisdictions have regulatory guidelines around representation and inclusivity, with GMA needing to reflect the diversity of the jurisdictions in which it is disseminated. In the Canadian context, Federal Ministerial mandates require that Gender-based Analysis be conducted for new and modified regulations and policies. Gender-based Analysis in this case is the examination of intended and potentially, unintended impacts of



regulations on individuals with various biopsychosocial characteristic profiles. Canadian regulators should prioritize DEI when creating GMA mandates. Other jurisdictions can learn from Canada's approach and evidence base.

In this multi-phased study, content analysis of social media GMA in Ontario highlighted the homogeneity of the population represented in the GMA with only 15% of the population being non-Caucasian; the majority of ads depicted Caucasians followed by African Americans. This contrasts with the 2021 census which showed visible minorities represented 34.3% of the Ontario population. There was also inequity in representation of individual's sex, with three quarters of the ads depicting individuals with male sexual characteristics. Diversity extends beyond race or ethnicity alone and further considerations to demographic variables such as gender, religion, and socioeconomic status, and how they can be represented in GMA is imperative. Advertisements that lack DEI considerations risk alienating audiences and reinforcing a narrow, one-size-fits-all view of gambling. By including diverse voices, advertisements can reach broader audiences with messages that resonate on an equitable and culturally relevant level, promoting safer gambling practices universally. Furthermore, different communities perceive gambling differently based on cultural norms. Messaging crafted with a DEI lens can help to ensure the respecting of cultural nuances while promoting RG. For example, campaigns can acknowledge the risks without stigmatizing or glamorizing gambling.

Operators' approach to DEI in marketing, however, must be done in good faith. Failure to incorporate DEI considerations in a responsible manner could perpetuate stereotypes and lead to increased vulnerability to gambling harms. Studies have shown that certain ethnic populations are at higher risk to gambling and gambling ingrained attitudes toward gambling, resulting in early exposure, combined with its availability in Western settings, contribute to increased gambling activities among some communities during celebrations<sup>27,28</sup> Gambling tends to increase during cultural celebrations, where participation may be framed as part of tradition.<sup>27</sup> Gambling ads which are targeted to higher risk populations during cultural celebrations can be problematic, leading to increased harms. DEI-informed GMA must follow best practices rooted

## Considerations For Regulatory Measures Around Gambling Marketing And Advertising

in harm prevention and cultural sensitivity. Similarly, specific types of gambling can also lead to heightened vulnerabilities.<sup>29</sup> DEI focused GMA should be based on best practices that emphasizes harm prevention and minimization. While specific ethnic communities are not explicitly identified to avoid stigmatization within current report, operators are encouraged to conduct due diligence in assessing populations at risk within their jurisdictions and to plan accordingly.

### Recommendations for Regulators

- Operationalize the prohibition of GMA practices that will unduly target vulnerable populations.
- Revise and update regulatory policy in lockstep with science-based evidence on GMA impacts on vulnerable populations.

### Recommendations for Operators

- GMA, particularly RG advertising, should promote fairness, accessibility, and ethical practices by being inclusive of demographic factors like ethnicity, sex, and disability, while avoiding undue focus on vulnerable populations.
- RG messaging development should be culturally sensitive and designed to address the unique beliefs and values of different ethnocultural populations.
- Representation of ethnic communities in GMA should be done in good faith and ensure that vulnerable populations, that might be susceptible to gambling and gambling harms, are not targeted.
- For certain vulnerable populations, cultural celebrations are periods of increased gambling activity, requiring careful consideration in GMA campaigns. To mitigate potential harms, these campaigns should incorporate RG messaging, such as reminders to gamble within limits, to promote responsible behavior and reduce gambling-related risks.
- Operators should collaborate with culturally competent consultants and DEI-trained researchers to ensure that DEI implementations in GMA are conducted with a trauma-informed harm minimization focus.



### Recommendations for Researchers

- To enhance responsible gambling (RG) efforts, researchers should investigate how the intersectionality of sociodemographic characteristics influences both the behavioral impacts of gambling marketing and advertising (GMA) and individuals' perceptions of GMA.

### Crux of Intersectionality

Across all jurisdictions the current regulatory focus is on age. While some blanket regulations specific to protecting vulnerable populations exist in regulatory standards and marketing codes, there is a notable lack of clear definitions for vulnerable groups within the gambling industry. In the literature, there are intersecting individual characteristics (e.g., mental health, race, culture, ability, sexuality) which may constitute an individual belonging to part of a vulnerable group. In the academic arena, there is increasing recognition of how these individual characteristics contribute to vulnerabilities to gambling harms. However, current GMA regulations and industry understanding of—and language sensitive to—these characteristic factors is lacking.

It is the case that any regulatory measures that aim to protect vulnerable communities need to be evidence-informed. Moreover, regulations must be careful not to inadvertently stigmatize these communities/individuals.

### Recommendations for Regulators

- Regulations prohibiting sexualized images and sexualization of female and male bodies in GMA is necessary.
- The current definition of vulnerable populations needs to be informed by current academic evidence while ensuring that regulatory standards do not further stigmatize these communities.

### Recommendations for Researchers

- Research on the biopsychosocial factors and their association with GMA and gambling harms are necessary.
- Research should also aim to explore how intersecting social identities compound consumer vulnerabilities.



### Putting on a Ban(dage)

The proliferation of GMA has been a concern for regulators and the general public across various jurisdictions. The public is being exposed to GMA through multiple sources, including through social media and, during sporting events through sports commentaries, sports merchandise, etc.<sup>3,18</sup> The online panel survey of Ontarians and New Jerseyites highlighted that over half (51%) the sample population perceived there to be an increase in GMA in the past 12 months. Similarly, a large portion of the sample also reported that they perceived GMA in general (46%) and GMA during sporting events (47%) to be excessive. In line with these public perceptions, multiple regulatory attempts have been made to reduce the volume of GMA. These have included regulations that limit the amount of budget allocated towards GMA and placing limitations around location and timing of GMA placement. An example of the latter is seen in the UK's whistle-to-whistle ban, which prevents GMA from five minutes before the start of live sporting event to five minutes after it has ended.<sup>30</sup> Recently, there has been an increasing number of jurisdictions implementing complete GMA bans (e.g., Belgium, Italy). However, studies on the impact of complete bans are lacking.

One additional consideration should be noted: over regulation, including complete bans, may have a detrimental impact for consumers and operators. Overregulation, such as complete bans, risks pushing consumers toward unregulated or illegal operators. Therefore, concerns around volume need to be balanced with ensuring competitive practices—all the while considering consumer protection.

### Recommendations for Regulators

- Regulations defining GMA volume should be informed by methodologically sound research evidence.
- Regulators currently considering complete GMA bans need to be informed by evaluation studies on the impact of complete GMA bans in jurisdictions such as Italy.

### Recommendations for Operators

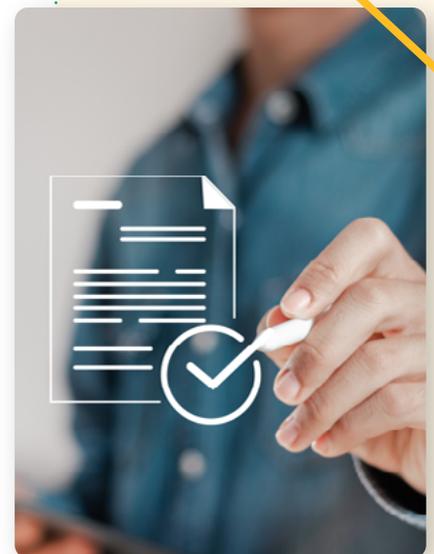
- Operators should strive to provide additional public education messaging on tools and regulations that are in place to effectively manage GMA exposure.
- Operators should engage regulators on market dynamics to ensure GMA rules are effective but not anti-competitive.

### Recommendations for Researchers

- Research should aim to explore the impact of complete GMA bans enacted in some jurisdictions, as well as the consumer and public perceptions and impacts related to appropriate volume and complete bans.
- This study provided a preliminary examination of public perceptions regarding the amount of gambling advertising during sporting events; however, more in-depth research is needed. This is important because GMA is highly prevalent in the gaming environment during such events, and young males, who make up a significant portion of the audience, are at higher risk.

### Best Practices Are Better for the Bottom Line

Implementing best practices and going above and beyond the regulatory recommendations can be advantageous for operators. Implementing best practices and exceeding minimum regulatory requirements benefits operators through consumer trust and long-term sustainability. A social ethos that prioritizes consumer protection and sustainability is better for the bottom line. Ethical and socially responsible marketing can result in player trust, attraction and retention which ultimately leads to increased sustainability. There has been an increasing cultural shift in consumer practices with consumers paying more attention to, and engaging with, brands that align with their morals and values. Unethical and unsustainable business practices such as unclear or misleading advertising, saturating the market with extensive marketing, etc., can have a detrimental effect and serve to drive consumers away. More than one quarter (29%) of the participants in the online panel survey reported that they are more likely to gamble with operators whose GMA is socially



and ethically responsible, and not merely meeting legal guidelines. Similarly, close to two-thirds of the participants (66%) who gambled online indicated that it was important for them to play on legal gambling websites and reported checking whether a gambling website is legal before opening an account. Finally, close to half (49.5%) of the sample reported perceiving micro-targeting to be an unethical practice and that they would avoid not utilize the services of gambling with operators who use who engage in micro-targeting practices. These findings highlight the importance for operators to engage in practices that not only meet the minimum regulatory requirements but go beyond these expectations. These findings underscore the value of socially responsible marketing.

### Recommendations for Operators

- Operators need to critically evaluate current regulatory practices in GMA and see where they can exceed minimum regulatory standards. Operators should critically assess where they can exceed minimum GMA requirements. For increased transparency and consumer trust, operators should consider an external evaluation of their current regulatory practices.
- Where possible, operators should aim to be more transparent about GMA practices, such as around micro-targeting (see recommendations above); providing accounting of the amount of GMA and RG messaging that is being disseminated; and implementing more DEI practices (see recommendations above).
- GMA practices should focus on sustainable and ethical business practices that will ultimately result in increased player attraction and retention.



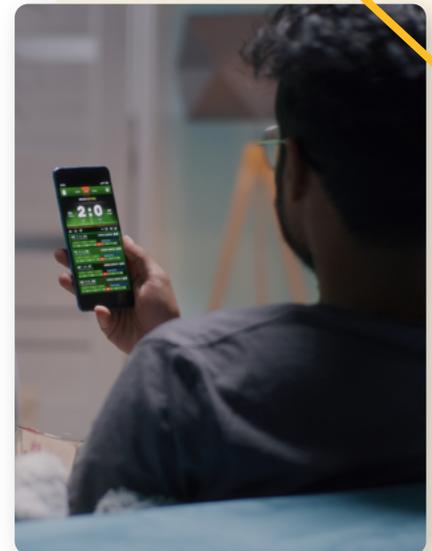
## Conclusion

This 3-phase project sought to address current gaps in knowledge around GMA best-practices through synthesizing available evidence on socially responsible marketing and advertising and form a better understanding of what balanced regulations and consumer protection practices look like. The findings of Phase 1 and Phase 2 informed the recommendations in this final report. The report highlights the need for regulators, operators, researchers, and community organizations to work together to develop best practices with focus on gambling harm prevention and minimization. While extensive, the current study is only the first step, and identifies areas that need further focus.



## Key Takeaways

1. Both regulators and operators recognize the importance of regulations allowing for competitive practices amongst legal operators, while ensuring consumer protection. Over regulation of GMA may backfire in several ways—alienating legitimate operators and inhibiting their ability to be competitive in the market; or more attractive inducements and poor GMA practices by illegitimate operators may influence consumers to choose illegitimate operators vs legitimate operators. Balance is required to ensure competitive practices.
2. There is concern that regulations are not keeping pace with the changing gambling landscape, particularly with the boom of online gambling and online GMA. With consumers moving away from traditional media outlets, the proliferation of social media usage and the pace of technological innovations, the opportunities for exploitation are also increasing and regulators are only now beginning to understand. With GMA regulation a step behind, unregulated operators may find and utilize regulatory loopholes that may harm both the general public and the operators who are in compliance. This highlights an area in which regulators can benefit from the expertise and knowledge of operators, marketing experts, researchers, and public health and community agencies.
3. There needs to be continuous critical evaluation and monitoring to ensure both regulatory standards and operator marketing codes reflect the current evidence-informed best- and better- practices.
4. GMA regulations need to be forward-facing with regulations rather than following on the heels of implemented practices. A holistic and collaborative approach between researchers, regulators, and operators will result in progressive regulations that result in better outcomes and provide solutions that can serve to address some of the concerns around GMA.
5. Future areas of interest include evaluation of loyalty programs, social gaming, affiliate marketing, and new and emerging forms of gambling (e.g., loot boxes in video games).



## References

1. Gopaldas A. Intersectionality 101. *Journal of Public Policy & Marketing*. 2013;32(1\_suppl):90–94. doi:10.1509/jppm.12.044
2. Rukmana D. Vulnerable Populations. In: *Encyclopedia of Quality of Life and Well-Being Research*. Springer Netherlands; 2014:6989–6992. doi:10.1007/978-94-007-0753-5\_3184
3. Newall PWS, Moodie C, Reith G, et al. Gambling Marketing from 2014 to 2018: a Literature Review. *Curr Addict Rep*. 2019;6(2):49–56. doi:10.1007/s40429-019-00239-1
4. Skiba J, Petty RD, Carlson L. Beyond Deception: Potential Unfair Consumer Injury from Various Types of Covert Marketing. *Journal of Consumer Affairs*. 2019;53(4):1573–1601. doi:10.1111/joca.12284
5. Guillou-Landreat M, Gallopel-Morvan K, Lever D, Le Goff D, Le Reste JY. Gambling Marketing Strategies and the Internet: What Do We Know? A Systematic Review. *Front Psychiatry*. 2021;12. doi:10.3389/fpsy.2021.583817
6. McGrane E, Wardle H, Clowes M, et al. What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature. *Public Health*. 2023;215:124–130. doi:10.1016/j.puhe.2022.11.019
7. Bouguettaya A, Lynott D, Carter A, et al. The relationship between gambling advertising and gambling attitudes, intentions and behaviours: a critical and meta-analytic review. *Curr Opin Behav Sci*. 2020;31:89–101. doi:10.1016/j.cobeha.2020.02.010
8. Thomas S, van Schalkwyk MCI, Daube M, Pitt H, McGee D, McKee M. Protecting children and young people from contemporary marketing for gambling. *Health Promot Int*. 2023;38(2). doi:10.1093/heapro/daac194
9. Nyemcsok C, Thomas SL, Pitt H, Pettigrew S, Cassidy R, Daube M. Young people's reflections on the factors contributing to the normalisation of gambling in Australia. *Aust N Z J Public Health*. 2021;45(2):165–170. doi:10.1111/1753-6405.13063
10. Clemens F, Hanewinkel R, Morgenstern M. Exposure to Gambling Advertisements and Gambling Behavior in Young People. *J Gambli Stud*. 2017;33(1):1–13. doi:10.1007/s10899-016-9606-x
11. Cook O. Lithuania bans all gambling advertising and promotions. *Ayo News*. <http://ayo.news/2021/05/21/lithuania-gambling-advert-ban/>. 2021. Accessed April 17, 2024.
12. Gambling ads in focus in Italy and Spain. International Association of Gaming Regulators. <https://iagr.org/industry-news/gambling-ads-in-focus-in-italy-and-spain/>. 2019. Accessed April 17, 2024.
13. Boeije H. A Purposeful Approach to the Constant Comparative Method in the Analysis of Qualitative Interviews. *Qual Quant*. 2002;36(4):391–409. doi:10.1023/A:1020909529486
14. Buchanan J, Shen Y. Gambling and marketing: a systematic literature review using HistCite. *Accounting & Finance*. 2021;61(2):2837–2851. doi:10.1111/acfi.12685
15. Bouguettaya A, Lynott D, Carter A, et al. The relationship between gambling advertising and gambling attitudes, intentions and behaviours: a critical and meta-analytic review. *Curr Opin Behav Sci*. 2020;31:89–101. doi:10.1016/j.cobeha.2020.02.010

## References

16. Labrador FJ, Estupiñá FJ, Vallejo-Achón M, et al. Exposure of adolescents and youth to Gambling advertising: a systematic review. *Anales de Psicología*. 2021;37(1):149-160. doi:10.6018/analesps.428921
17. Guillou-Landreat M, Gallopel-Morvan K, Lever D, Le Goff D, Le Reste JY. Gambling Marketing Strategies and the Internet: What Do We Know? A Systematic Review. *Front Psychiatry*. 2021;12. doi:10.3389/fpsy.2021.583817
18. Binde P. Gambling Advertising: A Critical Research Review Per Binde Responsible Gambling Trust Gambling Advertising: A Critical Research Review Responsible Gambling Trust Recommended Citation. www.responsiblegamblingtrust.org.uk
19. Abarbanel B, Gainsbury SM, King D, Hing N, Delfabbro PH. Gambling Games on Social Platforms: How Do Advertisements for Social Casino Games Target Young Adults? *Policy Internet*. 2017;9(2):184-209. doi:10.1002/poi3.135
20. Dovzhik G V., Arzhanova KA, Dovzhik VN. The use of cartoon characters in brand advertising communications. *Digital Sociology*. 2023;6(1):29-38. doi:10.26425/2658-347X-2023-6-1-29-38
21. Pitt H, McCarthy S, Randle M, Daube M, Thomas SL. Young people's views about the use of celebrities and social media influencers in gambling marketing. *Health Promot Int*. 2024;39(1). doi:10.1093/heapro/daae012
22. Smith M, Chambers T, Abbott M, Signal L. High Stakes: Children's Exposure to Gambling and Gambling Marketing Using Wearable Cameras. *Int J Ment Health Addict*. 2020;18(4):1025-1047. doi:10.1007/s11469-019-00103-3
23. Killick E, Griffiths MD. Impact of Sports Betting Advertising on Gambling Behavior: A Systematic Review. *ADDICTA: The Turkish Journal on Addictions*. 2022;8(3):201-214. doi:10.5152/ADDICTA.2022.21080
24. Luo H. An Exploratory Study through a Life Course Perspective: Gambling among Older Chinese People in a Canadian Context. *Ageing Int*. 2021;46(3):253-284. doi:10.1007/s12126-020-09383-w
25. Wong C, Wu HC. Gambling behavior of ethnic Chinese and Vietnamese college students in the United States. *Int Gambli Stud*. 2020;20(1):14-36. doi:10.1080/14459795.2019.1646779
26. Williams RJ, Belanger YD, Leonard CA, et al. Indigenous Gambling and Problem Gambling in Canada. *J Gambli Stud*. 2022;38(1):67-85. doi:10.1007/s10899-021-10022-5
27. Kim W. Acculturation and gambling in Asian Americans: When culture meets availability. *Int Gambli Stud*. 2012;12(1):69-88. doi:10.1080/14459795.2011.616908
28. Chee TT, Lui YS. Pathological Gambling, Gambling Disorder, and Problem Gambling Among the Chinese Ethnic Population Living in Western Countries: Is Culture a Sufficient Explanation for the Reported Excess Rates? *J Gambli Stud*. 2021;37(3):927-945. doi:10.1007/s10899-021-10012-7
29. Syvertsen A, Leino T, Pallesen S, Smith ORF, Mentzoni RA, Erevik EK. Telescoping and gender differences in high-risk gambling: Loss limit behavior in a population of electronic gaming machine players. *Psychology of Addictive Behaviors*. 2023;37(3):499-508. doi:10.1037/adb0000844
30. Torrance J, John B, Greville J, O'Hanrahan M, Davies N, Roderique-Davies G. Emergent gambling advertising; a rapid review of marketing content, delivery and structural features. *BMC Public Health*. 2021;21(1):718. doi:10.1186/s12889-021-10805-w

## Appendix A. Survey

### Screening Questions

#### S1. In which Province/ State/ Territory in Canada/ USA do you reside?

- |                        |                                  |                               |
|------------------------|----------------------------------|-------------------------------|
| 1. Alabama (AL)        | 22. Michigan (MI)                | 43. Utah (UT)                 |
| 2. Alaska (AK)         | 23. Minnesota (MN)               | 44. Vermont (VT)              |
| 3. Arizona (AZ)        | 24. Mississippi (MS)             | 45. Virginia (VA)             |
| 4. Arkansas (AR)       | 25. Missouri (MO)                | 46. Washington (WA)           |
| 5. California (CA)     | 26. Montana (MT)                 | 47. West Virginia (WV)        |
| 6. Colorado (CO)       | 27. Nebraska (NE)                | 48. Wisconsin (WI)            |
| 7. Connecticut (CT)    | 28. Nevada (NV)                  | 49. Wyoming (WY)              |
| 8. Delaware (DE)       | 29. New Hampshire (NH)           | 50. Alberta                   |
| 9. Florida (FL)        | 30. New Jersey (NJ)              | 51. British Columbia          |
| 10. Georgia (GA)       | 31. New Mexico (NM)New York (NY) | 52. Manitoba                  |
| 11. Hawaii (HI)        | 32. North Carolina (NC)          | 53. New Brunswick             |
| 12. Idaho (ID)         | 33. North Dakota (ND)            | 54. Newfoundland and Labrador |
| 13. Illinois (IL)      | 34. Ohio (OH)                    | 55. Nova Scotia               |
| 14. Indiana (IN)       | 35. Oklahoma (OK)                | 56. Ontario                   |
| 15. Iowa (IA)          | 36. Oregon (OR)                  | 57. Prince Edward Island      |
| 16. Kansas (KS)        | 37. Pennsylvania (PA)            | 58. Quebec                    |
| 17. Kentucky (KY)      | 38. Rhode Island (RI)            | 59. Saskatchewan              |
| 18. Louisiana (LA)     | 39. South Carolina (SC)          | 60. Northwest Territories     |
| 19. Maine (ME)         | 40. South Dakota (SD)            | 61. Nunavut                   |
| 20. Maryland (MD)      | 41. Tennessee (TN)               | 62. Yukon                     |
| 21. Massachusetts (MA) | 42. Texas (TX)                   |                               |

[TERMINATE IF Not New Jersey/Ontario, see ineligibility statement]

#### S2. Are you a permanent resident of [Ontario/New Jersey] (i.e., have resided in [Ontario/New Jersey ] for the past 3 months with no immediate plans to move out of [province/state])?

1. Yes
2. No [TERMINATE, see ineligibility statement]

#### S3. How old are you?

[TERMINATE IF <18 years, see ineligibility statement]

### Ineligibility Statement

Thank you for your interest in this survey. Unfortunately, you do not meet the eligibility criteria. Participants must be 18 years of age or older and be a permanent resident of [Ontario/New Jersey]. If you have any further questions or comments, please contact Dr. Marudan Sivagurunathan ([marudans@rgco.org](mailto:marudans@rgco.org); 1-647-272-9445)

## Demographics

### A1. How long have you been a resident of [Ontario/ New Jersey]?

1. Less than 1 year
2. Between 1 and 3 years
3. Between 3 and 5 years
4. Between 5 and 10 years
5. Between 10 and 20 years
6. Over 20 years

### A2. What is your gender identity?

1. Man
2. Woman
3. Non-binary or Transgender
4. Prefer not to answer
5. Prefer to specify: \_\_\_\_\_

### A3. Please select the option that best reflects your cultural identity:

1. Indigenous (e.g., First Nation, Métis, Inuit)
2. Black (e.g., African, Haitian, Jamaican, Somali, etc.)
3. Caucasian/White (e.g., European)
4. East Asian (e.g., Chinese, Japanese, Korean, Taiwanese, etc.)
5. Latin American (e.g., Brazilian, Cuban, Mexican, Guatemalan, Peruvian, etc.)
6. Pacific Islander/Polynesian (e.g., Native Hawaiian, Samoan, Cook Islander, etc.)
7. South Asian (e.g., Afghan, East Indian, Pakistani, Sri Lankan, etc.)
8. Southeast Asian (e.g., Cambodian, Indonesian, Laotian, Vietnamese, Filipino, etc.)
9. West Asian (e.g., Armenian, Iraqi, Iranian, Israeli, Turkish, etc.)
10. Multi-ethnic (please specify): \_\_\_\_\_
11. You do not have an option that applies to me. I identify as:

### A4. What is the highest level of education you have completed?

1. No high school or General Education Development (GED) diploma (1)
2. High school or GED (2)
3. Trade or technical certification (3)
4. Bachelor's degree (4)
5. Master's degree (5)
6. Professional degree (e.g., law, medicine, dentistry, pharmacy, etc.) (6)
7. Doctoral degree (7)

### A5. What is your current employment status?

1. Employed, full-time
2. Self-employed, full-time
3. Employed part-time
4. Self-employed, part-time
5. Unemployed, retired (not looking for work)
6. Unemployed, student (not looking for work)
7. Unemployed, looking for work
8. Homemaker
9. Not working
10. Other: Please specify \_\_\_\_\_

### A6. What is your household income, before taxes and transfers?

1. Less than \$10,000
2. \$10,000 to \$19,999
3. \$20,000 to \$29,999
4. \$30,000 to \$39,999
5. \$40,000 to \$49,999
6. \$50,000 to \$59,999
7. \$60,000 to \$69,999
8. \$70,000 to \$79,999
9. \$80,000 to \$99,999
10. \$100,000 to \$149,999
11. \$150,000 to \$199,999
12. \$200,000 or more

### A7. Do you live alone or with others?

1. Live alone
2. Live with others [Prompt A7a]

### A7a. [Follow-up:] Please select all the people you currently live with:

1. With my partner
2. With my child(ren)
3. With my parent(s) and/or in-law(s)
4. With my sibling(s)
5. With other extended family
6. With a friend(s)
7. With a housemate(s)
8. Other: \_\_\_\_\_

### A8. Do you self-identify as a person with a disability?

1. Yes- Visible [Prompt A8a]
2. Yes- Non-Visible\*[Prompt A8a]
3. Yes - Both [Prompt A8a]
4. No
5. I choose not to answer

### A8a. If you answered yes to question A8, What type of disability do you have? (Choose all that apply)

1. I have difficulty seeing even if wearing glasses.
2. I have difficulty hearing even if using a hearing aid.
3. I have difficulty walking or climbing steps.
4. I have difficulty remembering or concentrating.
5. I have difficulty with self-care such as washing all over or dressing.
6. Using my usual language, I have difficulty communicating, for example understanding or being understood.

### A9. Have you gambled in the past 12 months, either in person or online? (e.g., lottery, bingo, raffles, casino games, sports-betting, horse-racing, private wagers with friends or family)

1. Yes
2. No

## Gambling Activities

B1. Over the past 12-months (since April 2022), have you engaged in any of the following gambling activities? [G1]

	Online [1]	In-Person [2]	Booth [3]	I did not engage in this activity [4]
	<ul style="list-style-type: none"> <li>• Played instant Lottery Games (i.e., scratch tickets) Played lottery tickets (e.g., Lotto 6/49, Lotto MAX, etc.)</li> <li>• Bought raffle or fundraising tickets online (i.e. 50/50) Played electronic gambling machines (e.g., slot machines, electronic blackjack, electronic roulette or video poker)</li> <li>• Played poker Played casino table games (e.g., blackjack, baccarat, or roulette)</li> <li>• Played bingo Parlay bet on live sports with bookmaker/bookie (i.e., bet on the outcome of two or more matches for sports such as hockey, football, tennis, soccer, etc)</li> <li>• Bet on sports pools with friends Bet on esports (e.g., League of Legends, Dota 2)</li> <li>• Bet on virtual sports (e.g., virtual horse racing, virtual soccer)</li> <li>• Bet money on horse races</li> <li>• Bet on a single sporting event through a bookmaker (i.e., bet on the winner or loser of a single match or an aspect of that game, such as the number of penalties, etc.)</li> <li>• Bet on politics or novelty events (e.g., election outcomes, award shows, TV contests, etc.)</li> <li>• Bet on card games or outcomes of games of skill (i.e. pool, golf) informally with friends</li> </ul>			

B2. Over the past 12 months (since April 2022), have you engaged in any of the following sports betting activities? [G1]

	Online [1]	In-Person [2]	Booth [3]	I did not engage in this activity [4]
	<ul style="list-style-type: none"> <li>• Bet on special events (e.g. the Super Bowl)</li> <li>• Bet on each outcome of a sporting event</li> <li>• Placed live (in-play) bets throughout a sporting event (i.e. once the game had started)</li> <li>• Placed bets with multiple sportsbooks for a single game</li> </ul>			

## Affiliate Marketing

Affiliate marketing is the process by which an affiliate (e.g., social media influencer, celebrities) earns a commission for marketing another person's or company's products.

### C1. During the past 12-months, have you watched others gamble online (e.g., through Twitch, Youtube, Tiktok, other online streaming platform)

1. Yes
2. No
3. Not sure

### C2. My encounters watching affiliates gamble usually makes me feel...

1. More positively toward the gambling operator
2. More negatively toward the gambling operator
3. I don't feel any different toward the gambling operator

### C3. Have You Ever Joined a gambling app/ site based on suggestions from affiliate?

1. Yes
2. No
3. Not Sure

### C4. To what extent Do You Trust Affiliate Ads/Sponsored Links?

1. Strongly Trustful
2. Trustful
3. Neutral
4. Distrustful
5. Strongly Distrustful

### C5. To what extent are you satisfied with the information displayed on the affiliate ads/posters

1. Very satisfied.
2. Moderately satisfied.
3. Neither satisfied nor dissatisfied.
4. Moderately dissatisfied.
5. Very dissatisfied.

### C6. Seeing a celebrity/athlete on gambling ads make the gambling website seem more credible.

1. strongly agree,
2. agree,
3. neutral,
4. disagree,
5. strongly disagree

### C7 Seeing a celebrity/athlete make the gambling website seem more fun.

1. strongly agree,
2. agree,
3. neutral,
4. disagree,
5. strongly disagree

### C8. Seeing a celebrity/athlete make me want to gamble more with that site.

1. strongly agree,
2. agree,
3. neutral,
4. disagree,
5. strongly disagree

### C9. Online gambling marketing and advertising should be more regulated

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

## Use of Regulated Services

### D1. Do you gamble online?

1. Yes [prompt all other D questions]
2. No

### D2. When gambling online, how important is it for you to play on gambling websites that are legal in [Ontario/ New Jersey]?

1. Not at all important
2. Slightly important
3. Moderately important
4. Very important
5. Extremely important

### D3. How often do you check whether a gambling website is legal before opening an account.

1. Never [Prompt D3a]
2. Rarely [Prompt D3b]
3. Sometimes [Prompt D3b]
4. Often [Prompt D3b]
5. Always [Prompt D3b]

### D3a. Why don't you check?

-----  
-----

### D3b. How do you determine whether a gambling website is legal?

1. I check [iGaming Ontario's website/ New Jersey Internet Gaming Authorized Sites webpage]
2. I read the consumer protection statement on the gambling website
3. I look it up online
4. Word of mouth
5. Other: -----
6. I don't check

## Perceptions Around GMA

**E1. In the last 12 month(s), have you seen or heard gambling being promoted in the following ways. (choose all that apply)**

1. By Mail
2. By Email (i.e. Electronic newsletters, Promotional emails, Advertisements)
3. By Mobile (i.e text messages, whatsapp messenger, telemarketing)
4. Social media (i.e. Facebook, Instagram, Twitter, YouTube)
5. Online pop-ups
6. Advertisements on television
7. Advertisements on radio
8. Advertisements on magazines or newspapers
9. Advertisements on billboards
10. Advertisements on sport/event sponsorship

**E2. Over the past 12 months, the amount of gambling advertisements I see has:**

1. Increased
2. Decreased
3. Stayed the same

**E3. The current amount of gambling advertising is excessive.**

1. Strongly Disagree
2. Disagree
3. Neither Agree nor Disagree
4. Agree
5. Strongly Agree

**E4. The current amount of gambling advertising during sporting events is excessive.**

1. Strongly Disagree
2. Disagree
3. Neither Agree nor Disagree
4. Agree
5. Strongly Agree

**E5. Seeing gambling advertising usually makes me feel**

1. More positively about the gambling operator
2. More negatively about the gambling operator
3. I don't feel any differently about the gambling operator

**E6. What other ways have your encounters with gambling advertisements influenced your thoughts and behaviours?**

## Impacts of gambling advertising

**F1. I am more likely to gamble after seeing a gambling advertisement**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F2. Gambling advertisements do not influence my decisions to gamble**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F3. Gambling advertisements increase my interest in gambling**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F4. Gambling advertisements make think about gambling in the future**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F5. I don't pay attention to gambling advertisements**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F6. Gambling advertisements have increased my knowledge of what gambling options are available to me**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F7. Gambling advertisements have increased my knowledge of available gambling providers**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F8. I play with higher risk (use more money) because of gambling advertisements**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F9. I think more positively about gambling because of gambling advertisements**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F10. I have learned about new types of gambling games because of gambling advertisements (or I have played new types of gambling games)**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F11. Gambling advertisements make me want to gamble more often than I want to**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F12. I Recall the Responsible Gambling (RG) information that is provided within gambling ads**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F13. Gambling advertisements have increased my knowledge/educated me in how to gamble within my means**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F14. I am more likely to gamble with a specific operator after seeing a gambling ad from the operator**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

**F15. I am more likely to gamble with a gambling operator whose gambling advertisements are socially and ethically responsible (Not just meet the legal guidelines)**

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree
5. Strongly Agree

## Direct Marketing

Direct marketing is any marketing activity that communicates directly with a potential customer through mail, emails, flyers, phone calls, text messages or other channels. It is different from traditional marketing, such as TV commercials and billboards, which does not target any one recipient.

**G1. Direct marketing enhance the awareness of gambling products and services available to customers**

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

**G2. Direct marketing tools attract the new customers**

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

**G3. Direct marketing encourage gambling**

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

**G4. Most direct marketing advertising is very annoying**

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

**G5. Advertising by direct marketers should be more regulated**

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

**G6. Direct marketing is all "junk"**

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

**G7. There is "too much" direct marketing today**

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

**G8. I am irritated by the large amount of gambling mail and catalogs I receive everyday**

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

**G9. I follow gambling websites/companies on social media.**

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

## Microtargeting

Microtargeting is the use of online data to tailor advertising messages to individuals, based on the identification of recipients' personal vulnerabilities.

**H1. Microtargeting attract the new customers**

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

**H2. Microtargeting encourage gambling**

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

**H3. Microtargeting is not an ethical practice**

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

**H4. I would not utilize the services of gambling operators that engage in microtargeting practices**

1. Strongly agree
2. Agree
3. Not sure
4. Disagree
5. Strongly disagree

## SKEP Scale

Please answer the following questions as it pertains to gambling related advertising.

**I1. We can depend on getting the truth in most advertising.**

- 1 2 3 4 5 6 7

**I2. Advertising's aim is to inform the consumer.**

- 1 2 3 4 5 6 7

**I3. I believe advertising is informative.**

- 1 2 3 4 5 6 7

**I4. Advertising is generally truthful.**

- 1 2 3 4 5 6 7

**I5. Advertising is a reliable source of information about the quality and performance of products.**

- 1 2 3 4 5 6 7

**I6. Advertising is truth well told.**

- 1 2 3 4 5 6 7

**I7. In general, advertising presents a true picture of the product being advertised.**

- 1 2 3 4 5 6 7

**I8. I feel I've been accurately informed after viewing most advertisements.**

- 1 2 3 4 5 6 7

**I9. Most advertising provides consumers with essential information.**

- 1 2 3 4 5 6 7

**I10. Information conveyed in gambling marketing and advertising is**

...

**I10a. Honest**

- 1 2 3 4 5 6 7

**I10b. Dependable**

- 1 2 3 4 5 6 7

**I10c. Valuable**

- 1 2 3 4 5 6 7

**I10d. Likeable**

- 1 2 3 4 5 6 7

**I10e. Good**

- 1 2 3 4 5 6 7

**I10f. Benefits consumers**

- 1 2 3 4 5 6 7

**I10g. Credible**

1 2 3 4 5 6 7

**I10h. Complete**

1 2 3 4 5 6 7

**I10i. Factual**

1 2 3 4 5 6 7

**I10j. Useful**

1 2 3 4 5 6 7

**I10k. Helps people make the best decisions**

1 2 3 4 5 6 7

**I10f. Accurate**

1 2 3 4 5 6 7

**I10m. Truthful**

1 2 3 4 5 6 7

**I10n. Positive**

1 2 3 4 5 6 7

**I10o. Reliable**

1 2 3 4 5 6 7

**I10p. Enjoyable**

1 2 3 4 5 6 7

**I10q. Clear**

1 2 3 4 5 6 7

**I10r. Believable**

1 2 3 4 5 6 7

**I10s. Educational**

1 2 3 4 5 6 7

**I11. On a scale where 1 = don't trust at all and 7 = absolutely trust, how much do you trust the information conveyed in advertising?**

**I12. On a scale where 1 = not at all favorable and 7 = extremely favorable, how favorable do you feel toward advertising in general?**

**I13. On a scale where 1 = not at all credible and 7 = extremely credible, how credible do you think advertising in general?**

## Self-Exclusion

**J1. Have you ever registered for voluntary self-exclusion (i.e., self-banning from a gambling website or venue) in [Ontario/New Jersey]?**

1. Yes
2. No

**J2. When did you reinstate from your self-exclusion period and return to play?**

1. I haven't yet
2. Within the last 12 months
3. Between 1 and 2 years ago
4. Between 2 and 5 years
5. Do not know

**J3. Gambling ads made me want to gamble during my self-exclusion.**

1. strongly agree,
2. agree,
3. neutral,
4. disagree,
5. strongly disagree

**J4. Watching Gambling ads made me return to play after self-exclusion.**

1. strongly agree,
2. agree,
3. neutral,
4. disagree,
5. strongly disagree



411 Richmond Street East, Suite 205,  
Toronto, ON, Canada M5A 3S5

[ResponsibleGambling.org](https://ResponsibleGambling.org)

