



REPORT 20/2020

Content Department

Barcelona, 11 February 2020

**Analysis of online content
that promotes betting and gambling.
Conclusions.**

Conclusions

This report is part of a series that the CAC initiated with the reports 9/2017 *Analysis of online content related to betting and gambling* and 57/2018 *Analysis of online content that promotes betting and gambling*.

We analysed linear audiovisual media services (11 television channels and 5 radio stations), websites that provide on-demand television services, and content available on the main video-sharing platform (YouTube). The reports also show how data that is methodologically comparable has changed since the sample of 2018, as set out in report 57/2018.

The main conclusions of the analysis are:

Minors are exposed to gambling and betting adverts during the watershed. Furthermore, these are shown during programmes that may well appeal to minors, such as football matches.

A full 54.5% of television and 80% of radio adverts are broadcast during these hours. The proportions, however, vary by channel (see Figures 1 and 2). In addition, 15.1% of adverts on television and 28.6% on radio are shown during enhanced watershed.

The primary cause is advertising for sports betting during sports events, including during enhanced watershed, which is explicitly permitted in the *Code of Conduct on Betting and Gambling Advertising Activities*, agreed upon by the association Autocontrol and the competent authorities. Furthermore, children are among the audience of sports broadcasts.

Figure 1. Betting and gambling operator advertising according to scheduling on television channels

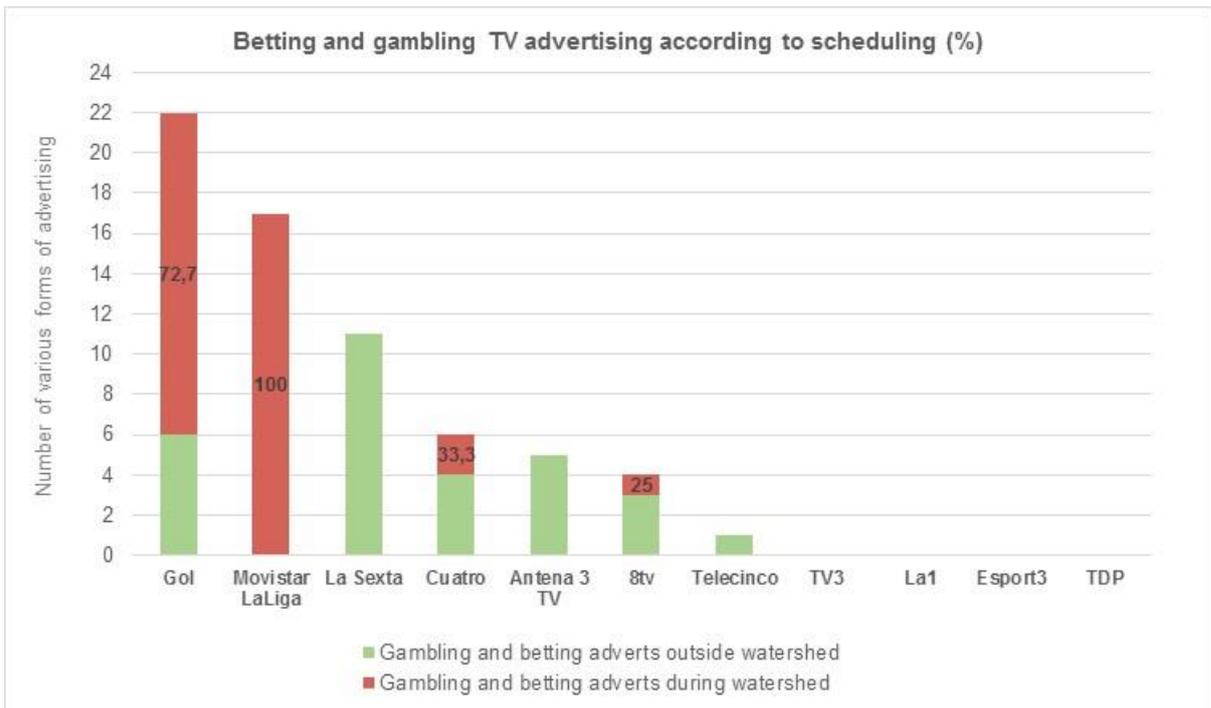
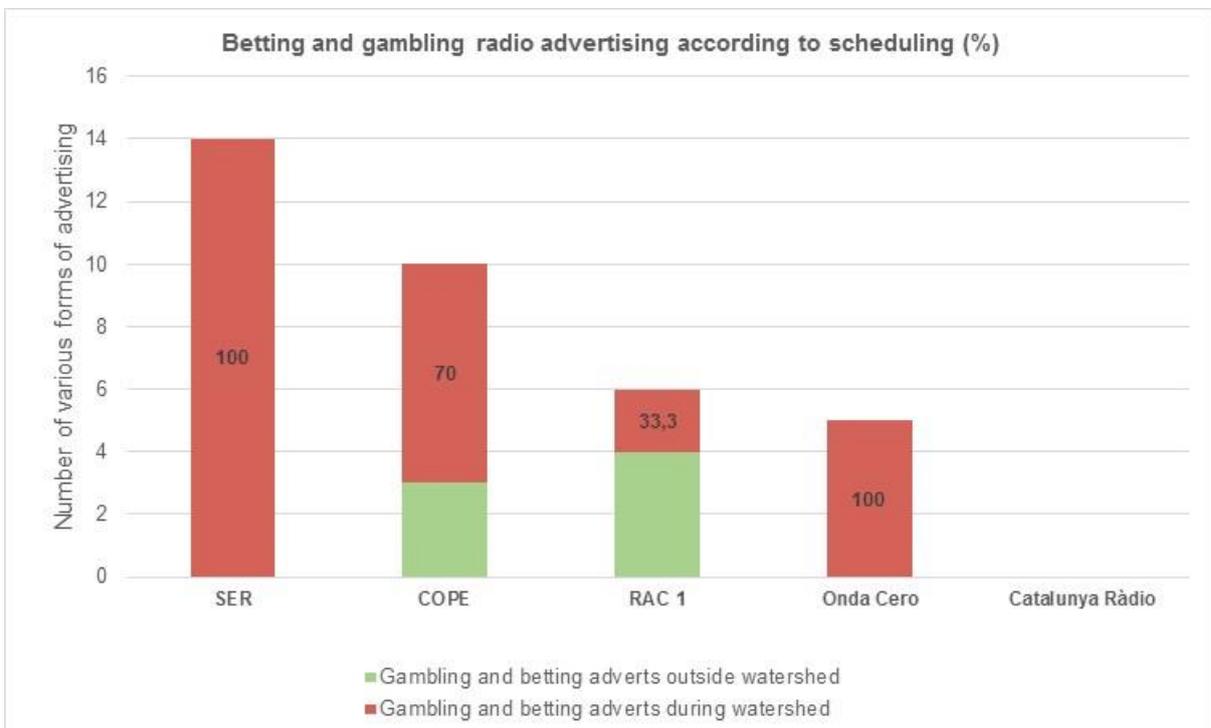


Figure 2. Betting and gambling operator advertising according to scheduling on radio stations



The younger audience's interest in professional football makes adverts that feature active football players as influencers more attractive to children and young people. For example, one betting operator has advertisements featuring first-team players from Real Madrid, accounting for 10.2% of the various adverts.

With regard to warnings, similarly to the advertising analysed in 2018, all forms of betting and gambling adverts on the television channels analysed include an age warning, which is one of the ethical standards set down in the abovementioned *Code of Conduct*.

In contrast, age warnings on the radio vary on the stations analysed, and have increased in total from 16.7% (2018) to 48.3% (2019).

Betting and gambling advertising is common on most television provider websites

Our analysis found no substantial change from the situation described in previous reports: betting and gambling advertising is still common on most of the television service provider websites analysed and comes in various formats, with banners being the most prevalent. Of the 21 websites analysed, only 7 had no adverts for betting operators (RTVE, 8tv, Energy, Atreseries, Super3, Clan and Boing).

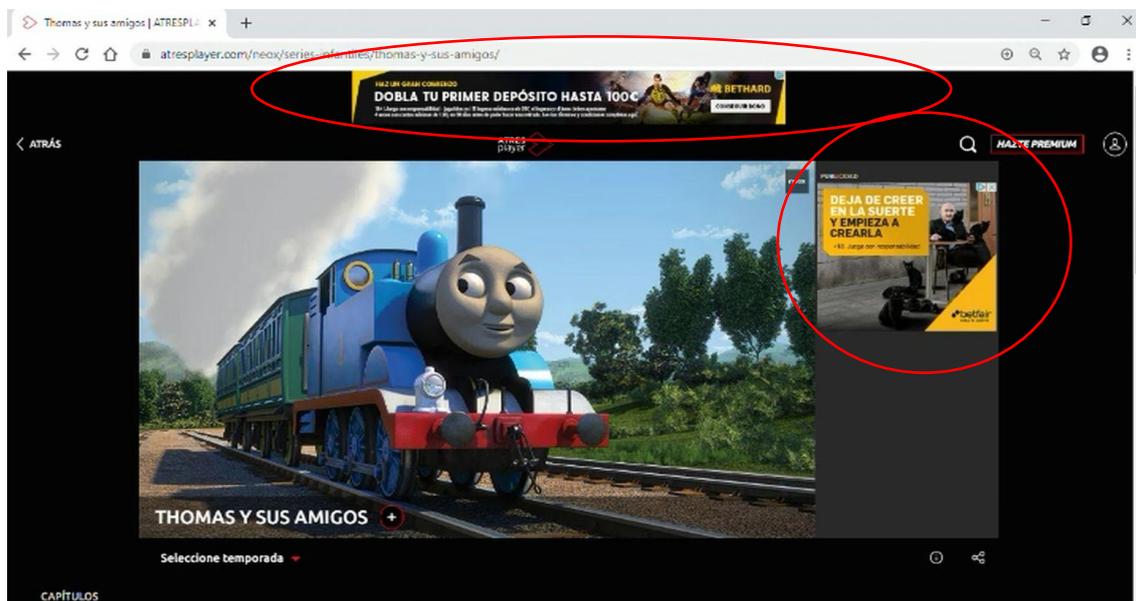
It is also worth noting that all formats of online advertising feature an embedded link that takes users directly to the betting operator website.

Two television service provider websites have no restrictions on betting and gambling advertising during children's programmes.

The Atresmedia group website for children's programming, NeoxKidz, allows betting and gambling advertising. Likewise, the Atresplayer service that offers on-demand content for the group, also allows banner adverts for betting and gambling operators during programmes aimed at children.

In contrast, the Super3, Clan and Boing websites have no commercial communications for betting and gambling and Super3 and Boing also display a warning message when a user is about to leave the site.

Image 1. Screenshot of the Atresplayer website with betting operator advertising shown during content aimed at children



Betting and gambling advertising is found only on privately-owned linear television and radio service providers

We found no commercials on the public television (TV3, La1, Esport3 and TDP) and radio providers (Catalunya Ràdio) analysed, and varying amounts on the private channels (laSexta, Cuatro, Antena 3 TV, 8tv and Telecinco, Gol and Movistar LaLiga; RAC1, SER, COPE, and Onda Cero; see Figures 3 and 4).

Figure 3. Betting and gambling operator commercials on television channels

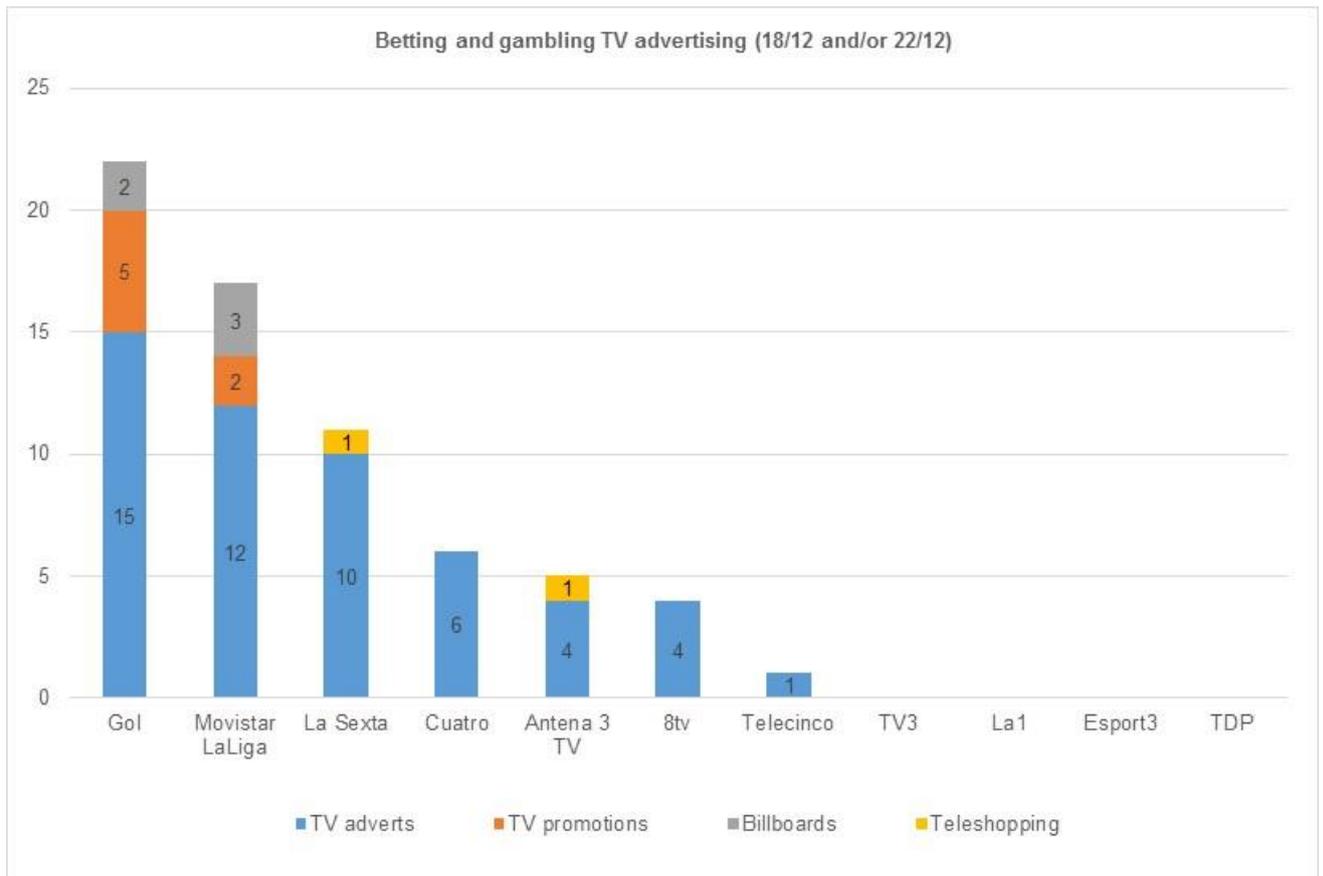
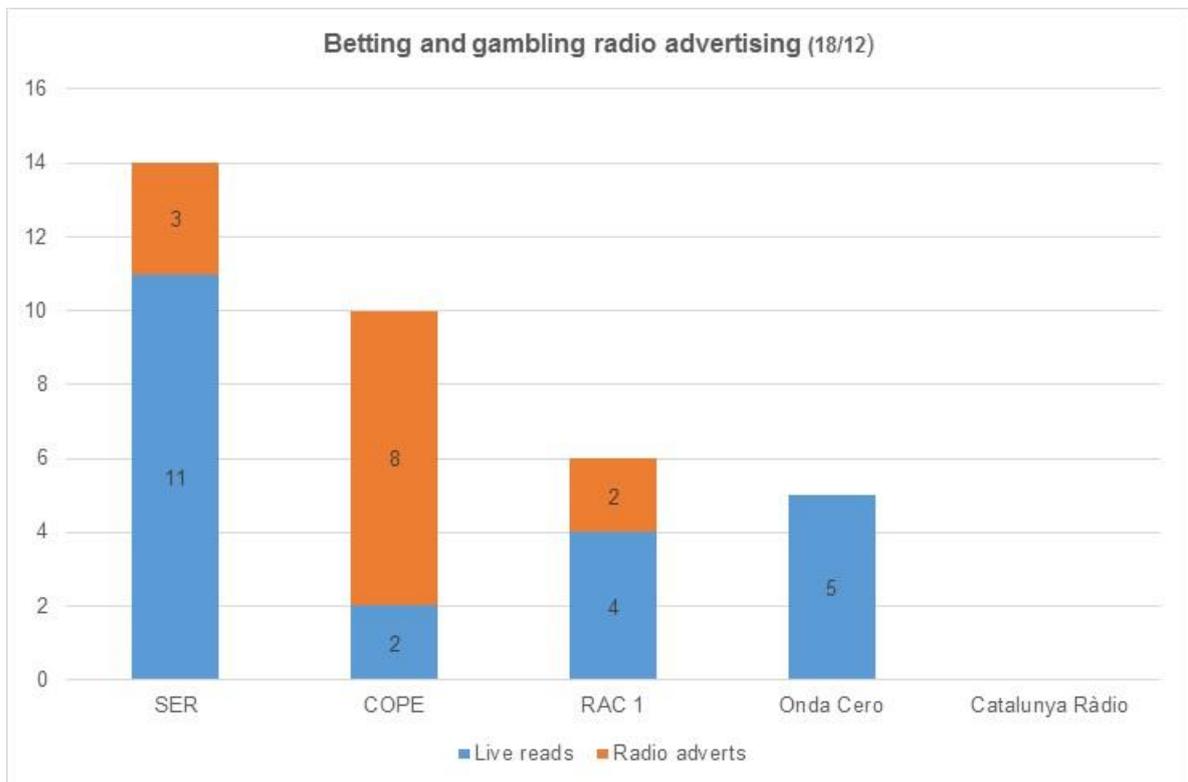


Figure 4. Betting and gambling operator commercials on radio stations



There is a direct relationship between sports programming and betting and gambling advertising, both in terms of the advertising product or service and place on the programming schedule.

On television, 83.7% of the various forms of advertising are for sports betting, while this figure stands at 96.4% on the radio. Gambling adverts (such as casino, bingo, blackjack, poker, roulette, slot machines) account for a very small proportion and have decreased significantly on television (by 30%) compared to report 57/2018.

The two private television broadcasters specialising in sports that hold the rights to first and second division men's football (GOL and Movistar LaLiga) are the channels with the most advertising.

Our analysis of adverts during the FC Barcelona - Real Madrid match (12/12/19 from 7pm to 10pm) broadcast on television and radio illustrates this relationship. On Movistar LaLiga, 37% of the adverts shown during the match broadcast were for sports betting. On the radio stations, the proportions vary: SER, 25%; Onda Cero, 16.1%; COPE, 9.8% and RAC1, 3.1% were betting and gambling advertising. There were no betting and gambling adverts during the match broadcast on Catalunya Ràdio. Table 1 shows a comparison of the results of the broadcasts of this match analysed for this report and the results of broadcasts analysed for the 57/2018 report.

Table 1. Comparison of betting and gambling advertising during Barça-Madrid (2019-2018)

Media	FC Barcelona - Real Madrid 18/12/2019		FC Barcelona - Real Madrid 28/10/2018	
	Number of betting and gambling adverts	% of total adverts	Number of betting and gambling adverts	% of total adverts
Movista LaLiga	17	37%	17	35.4%
Catalunya Ràdio	0	--	0	--
RAC1	2	3.1%	5	9.4%
SER	11	25%	10	15.9%
COPE	5	9.8%	10	17.2%
Onda Cero	5	16.1%	0	--

Betting and gambling advertising is more clearly identified on linear television than on radio

As in 2018, all of the television commercials analysed are identified as advertising: adverts appear during commercial breaks and TV promotions and billboards (on Gol and Movistar LaLiga) feature the overlay “Advertising” (a legal requirement for these forms of commercial, regardless of the product or service).

On the radio, live reads are the most widespread form of advert and, as these are incorporated into what the presenter is saying, they are not clearly identifiable, unlike pre-recorded formats. In contrast, radio adverts are clearly identifiable as such because they appear in commercial breaks (20.7% of advert forms in 2019 and 13.1% in 2018).

Certain features of betting and gambling advertising on both the television and the radio still encourage irresponsible gambling and impulsive conduct.

Responsible gambling, meaning any aspect that fosters "informed and sensible" decision-making and reduces the likelihood of risk behaviour¹, has certain implications for the design and content of gambling and betting advertising.

With regard to advertising messages or logos, one of the rules of the Code of Conduct, the term "**gamble responsibly**", **was found in all television commercials** (as in 2018) **and in 96.6% of radio commercials** (an improvement of 26% compared to 2018). Most betting and gambling advertising on television (53.1% of the various forms of advertising analysed) also includes a reference to voluntary exclusion from gambling, using the self-exclusion symbol.

All television commercials (except for one TV promotion on Movistar LaLiga) broadcast from 15 January 2020 include a final screen or banner with the standard warning about responsible gambling and minors, in response to an amendment on the rules of self-regulation of the Code of Conduct that came into force on this date.

Other features of the commercial practice of gambling operators run counter to promoting responsible gambling and although there is currently no specific legislation on these, they are set down in the ethical rules of the Code of Conduct.

¹This is the definition in the Directorate-General for the Regulation of Gambling document *Guidelines on promoting responsible behaviour in the digital environment*

For example, **offers of bonuses or promotions** were found in 61.2% of the various forms of advertising on television as a whole, and in 58.6% of radio adverts. The amounts offered range from €10 to €200. These are usually introductory offers and are therefore deployed to get people started in gambling and betting.

Compared to the sample analysed in 2018, there were fewer bonuses in television and radio advertising (a decrease by 20%). Likewise, in advertising analysed after 15 January, television and radio adverts no longer offer bonuses during sports broadcasts.

Turning now to the advertising narrative, **28.6% of television commercials** (40.2% in 2018) **and 41.4% on the radio** (13.1% in 2018) **convey messages that encourage immediate participation** and therefore contradict the objective of promoting non-compulsive gambling.

These include messages such as:

“Register **now**” (Telecinco, Antena 3 TV and La Sexta)

“Register **today** and discover a top bookmaker” (8tv)

“**Don't miss out on this opportunity**” (GOL)

“**What are you waiting for?** Let's go! ” (COPE)

“**Run, fly, bet**” (TO BE)

Advertising includes celebrities as advertising endorsement.

Celebrities, who increase brand awareness and credibility, still feature in sports betting advertising, in 20.4% of television advertising formats (13.5% in 2018) and 3.4% on the radio (5.6% in 2018).

This occurs in sports betting adverts by one operator that feature several Real Madrid football players, although they do not bet or explicitly encourage betting, which were broadcast on Cuatro, Antena 3 TV and laSexta (before the watershed); an actor (advert on Cuatro, Gol and Movistar LaLiga), a former football player and sports commentator (TV promotions on Gol), and a sports journalist (radio advert on COPE).

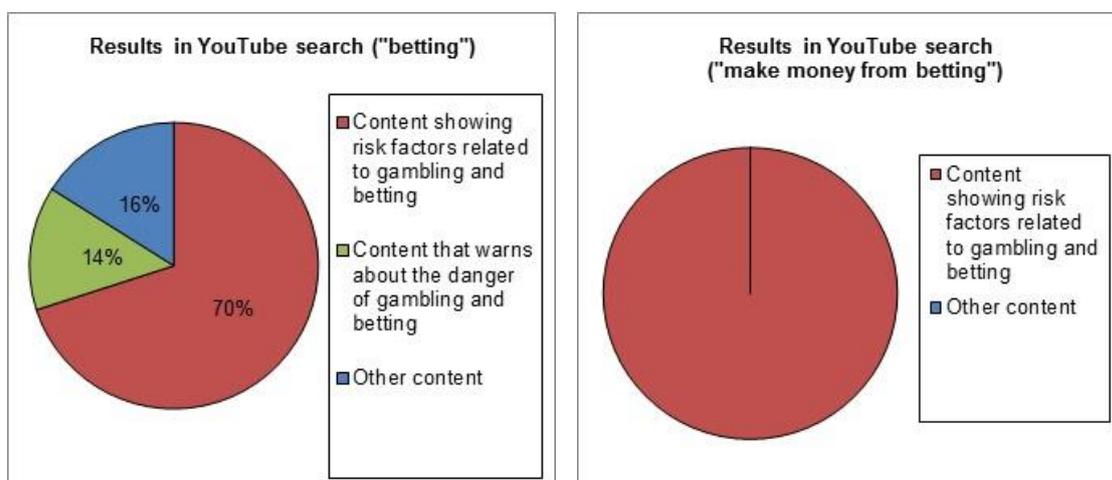
Adverts featuring current Real Madrid players were still broadcast after 15 January, despite a review of the Code of Conduct that places a restriction on current athletes as "influencers" of betting and gambling.

Most online content related to betting and gambling promotes risk

On YouTube, 100% of the top 50 videos contain risk factors related to gambling and betting in a search for "make money from betting". Among other aspects, these videos contain pleasant messages that encourage gambling, minimising the random nature of betting success and presenting it as an economic activity.

A search for a neutral term 'betting' also gives results in which risk content prevails: 70% of the top 50 videos contain risk factors. In contrast, only 14% are videos that highlight the negative side of betting. In other words, for every YouTube video that warns about the dangers of gambling, there are five videos that promote it.

Figure 5. Search results for 'betting' and for 'make money from betting' on YouTube. Top 50 results (23/01/20)



Over 1.1 million views on 21 YouTube videos that promote risk behaviour in betting and gambling

Betting and gambling promotions and advertising on the content of video-sharing platforms, specifically on YouTube, have a high audience. The 21 videos we analysed, which are a portion of the total available on the platform, have more than 1 million views, and the channels they are on, over 4 million subscriptions.

What is more, these audiences are growing: the two exclusively gaming and betting channels that we also analysed in the previous study have increased their subscriptions by 45% (Sumaverdes) and 175% (LePicks) in one year.

The videos portray gambling as a professional activity rather than a hobby: training and experience are depicted as the keys to winning, not chance.

Our analysis reveals that in addition to the YouTube channels that are specifically devoted to promoting betting and gambling, risk content related to gambling is found on channels covering a wide range of topics. For example, they are widespread on channels that purport to give financial investment advice. Here, betting and gambling are turned into **an economic activity: betting is no longer a game, but rather a profession**. This idea flouts the message that "if it isn't fun it isn't a game", which the *Code of Conduct* promotes in its communications. For example:

“Can you really make a lot of money from sports betting and even make a living from it? If you're a gambler you've probably asked yourself this thousands of times, and the answer is yes.”

(*CÓMO Crear un Sistema GANADOR para las APUESTAS DEPORTIVAS - 'HOW To Create a WINNING SYSTEM for SPORTS BETS' 🏆*)

Consequently, according to this view, betting gains no longer rely on chance but on **factors such as perseverance and training to reduce the likelihood of losing:**

“I think there are three qualities that are the true holy grail of sports betting. And these are the three qualities: practice, perseverance and patience.”

“Practice is necessary [...] You have to be constant in your work, constant in your studies, constant in your analysis and constant in the way you look at betting, understand betting, and ultimately in your strategy [...]”

(*EL SANTO GRILAL DE LAS APUESTAS DEPORTIVAS ¿EXISTE? - 'IS THERE A HOLY GRAIL OF SPORTS BETTING?'*)

Moreover, one of the videos takes this idea further to **trivialise problem gambling:** people get addicted because they lack "professionalism”:

“I know a lot of gambling addicts and they all lose money [...] I'm the only person I know who earns money from sports betting and that's because I have a professional tipster. The absolute requirement to make money from sports betting is not to be a gambling addict, because if you need it you'll bet on everything you see and you'll lose your money because you're not a specialist. Understanding is not the same as being an expert. Gambling addicts think they're good and know where to place a bet, but that's bs [...] I haven't lost any money with [this tipster] yet.”

*(Como Ganar Dinero Con Apuestas Deportivas
LA VERDAD – LUDÓPATAS y la LUDOPATÍA - 'How to Make Money From Sports
Betting THE TRUTH - GAMBLING ADDICTS AND ADDICTION')*

Two out of three videos analysed include hidden advertising

Most of the videos we analysed (66.6%, with 1 million views) contain adverts. The most common format is when a YouTuber includes advertising for a betting operator or platform as part of their video. In doing so, the channel creator constructs a narrative in favour of the service or product, expresses their own preferences and occasionally uses a tutorial format to show people how to place a bet or use a particular application:

“I'm going to do it with Betfair as they give me 400,000 coins for registering and placing a bet for 10 euros [...] You have to click on the register button and that will take you to the bookmaker's site so you can register [...] Personally, I'm going to do it with Betfair...”

*(Mejores Aplicaciones para GANAR DINERO POR INTERNET 2019 |
RAPIDO Y REAL - 'Best Applications to EARN MONEY ON THE
INTERNET 2019 | FAST AND REAL')*

In addition, 35.7% of these videos provide links to gambling and betting operators or applications and platforms linked to betting, where users can sign up to a service. YouTube explicitly prohibits this practice.

Although the YouTuber is advertising, he never explicitly states this, either in speaking, a written overlay, or by using the YouTube disclosure function. This misleads the audience as to the promotional nature of the products and services that feature in the videos.

Of the videos we analysed, 14.3% advertise betting and gambling operators with a trade name that is not on the Directorate-General's list of licensed operators.

Two of the channels analysed that feature content appealing to children also promote gambling and betting

Young audiences can access all gambling promotion and advertising content on the analysed channels freely and with no age restrictions.

In addition, on two of the channels analysed, content linked to gambling is interspersed with items that are clearly appealing to children, such as video games (TOBBALink) and consumer electronics (ProGadget). These channels have the highest number of subscriptions in the sample (over 4 million in total).

One channel with betting and gambling advertising (TOBBALink) recommends child YouTube channels and vice versa

This channel has a direct link to two popular children's channels, which have over 2 million subscriptions. This relationship involves the two children appearing at the end of TOBBALink's videos (including ones that promote sports betting) and a link on one of the children's channels (PINO) under 'Featured Channels' (Images 2 and 3). The relationship is two-way: the children's channel Pino y Ares also recommends and provides a direct link to TOBBALink.

Image 2. Child YouTube channel PINO is one of the *Featured channels* on TOBBALink

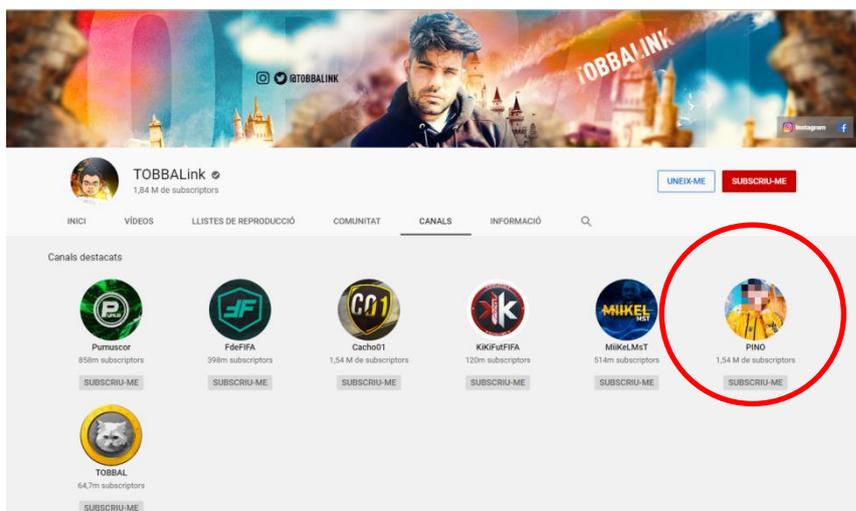


Image 3. Minors appear in videos containing gambling promotion on YouTube channel TOBBALink



In summary,

Children and adolescents are still exposed to betting and gambling advertising, both on linear media (even during enhanced watershed) and on the internet, where channels and videos with burgeoning audiences enable totally free access.

Moreover, reciprocal linking between a child YouTuber channel and another with videos promoting sports betting highlights just how easy it is for minors to access risk content on YouTube: the system of recommendations and relationships between channels on this platform provides access without even having to perform a specific search.

Barcelona, 11 February 2020