

SUBMISSION FROM THE AUSTRALIAN HEALTH PROMOTION ASSOCIATION TO THE INQUIRY INTO ONLINE GAMBLING AND ITS IMPACTS ON PROBLEM GAMBLERS

ABOUT THE AUSTRALIAN HEALTH PROMOTION ASSOCIATION

The Australian Health Promotion Association Ltd (AHPA®) is the peak body for health promotion in Australia. Incorporated in 1990, AHPA is the only professional association specifically for people interested or involved in the practice, policy, research and study of health promotion. Our vision is for a healthy, equitable Australia, delivered through leadership, advocacy and workforce development for health promotion practice, research, evaluation and policy. Our member-driven national Association represents over 1000 members and subscribers with branches representing each state and territory. Members represent a broad range of sectors including health, education, welfare, environment, transport, law enforcement, town planning, housing, and politics. They are drawn from government departments and agencies, universities, non-government organisations, community-based organisations and groups, private companies, and students.

Australia is one of the healthiest countries in the world largely because of effective health promotion practices - creating social and environmental conditions that enable Australians to enjoy a healthy and happy life. The role of health promotion has never been so significant. This is because we are now more aware than ever of just how complex the circumstances are by which human health is influenced. The health promotion workforce comprises of organisations and individuals responsible for planning, implementation, and evaluation of policies and projects within a socioecological framework and with a focus on comprehensive multi-level action across the determinants of health using strategies including: health education and information, health literacy, mass media, community development and community engagement processes, sponsorship, capacity building, advocacy, social marketing, health and public policy, technology, and environmental change.

INTRODUCTION

Australians reportedly lost over 25 billion dollars in legal forms of gambling in 2018 /2019 (Queensland Government, 2021), representing the largest per capita losses in the world (Australian Institute of Health and Welfare, 2021). Australia is also known to have one of the most normalised environments for gambling in the world (Pitt et al., 2022). Normalisation of gambling has been defined as, *“The interplay of socio-cultural, environmental, commercial and political processes which influence how different gambling activities and products are made available and accessible, encourage recent and regular use, and become a socially and culturally accepted part of everyday life for individuals, their families, and communities.”* (Thomas et al., 2018).

Online gambling is increasing in Australia and is a significant public health issue due to the associated detrimental effects, including debt accumulation, psychological harm, relationship, and social problems (Louderback et al., 2021; Hing, Russell et al., 2022). Increases in internet speed, along with mobile phone technology improvements and the ease of access to devices, places young at particular risk of gambling harm (Jose’ et al., 2021; Akcayir et al., 2022).

Changing gambling landscape

Since gambling went online in the 1990s it has rapidly expanded (Hing, Smith et al., 2022). An Australian study (Hing, Russell et al., 2021) found online gambling rates have roughly doubled from 8.1 per cent in 2011 to 17.5 per cent in 2019. This study found a significant increase in gambling harm since the last survey in 2010 and with gamblers now estimated 2.2 per cent more likely to experience harm from gambling. Results indicated that one in three people who gamble, now do so online compared to in 2010 where just one in eight gambled online (Hing, Russell et al., 2021). Practices often ingrained historically in Australian family traditions, such as participating in sweeps, was not such an issue before horseracing was heavily promoted. Now these and other gambling traditions are easily accessible online due to technological advances combined with heavy advertising and lighter restrictions for horse betting advertising.

A focus on the determinants of health

Renowned Global Health Professor, Ilona Kickbusch describes the commercial determinants of health as “strategies and approaches used by the private sector to promote products and choices that are detrimental to health”; marketing is one channel to achieve this (Kickbusch et al., 2016, p. e895). Extensive evidence shows the negative impacts on child and adolescent health by marketing unhealthy products and services (Mialon, 2020). The commercial determinants of health reveal the important problem where wealth is prioritised over health, thereby contributing immensely to a non-communicable disease pandemic (Kickbusch et al., 2016). The power that corporations have over our environment, culture and desirability of products is considerable (Kickbusch et al., 2016) and brings to light the question of how much power they have in determining regulations within their industry (Mialon, 2020). The World Health Organization suggests that the commercial determinants affect everyone, but young people are especially at risk, and unhealthy commodities worsen pre-existing economic, social and racial inequities (World Health Organization, 2021). The commercial determinants of health influence the social determinants of health, (the wider circumstances in which people are born, grow up, live, work and age). Addressing these can prevent illness, and promote societal equity (World Health Organization, 2021). Clearly, the commercial and social determinants of health, are changing the gambling landscape, rapidly influencing health and wellbeing, and requiring policy to keep pace (McCarthy et al., 2020).

GAMBLING ADVERTISING

Gambling advertising is increasing in frequency

Evidence suggests that \$271 million was spent in Australia on gambling advertising and sponsorships in 2020, increasing yearly (Duffy, 2021). Gambling advertising and sponsorship are some of the main drivers in developing attitudes towards gambling, intention to gamble, gambling behaviour and gambling harm, combined with the ease of access and availability of gambling platforms (O’Brien & Iqbal, 2019). Key findings from a study to determine the extent of young people’s exposure to gambling advertising revealed an alarming 948 ads on average per day in Victoria in 2021 (Victorian Responsible Gambling Foundation, 2022). Gambling advertising over the radio is frequent and provides another opportunity for betting companies to influence the public, including children.

Gambling advertising contributes to the normalisation of activity

A strong and growing evidence base supports the relationship between gambling advertising and gambling harm (Goyder et al., 2022), including harms to health and wellbeing. Gambling is a socially accepted behaviour embedded within specific social contexts, particularly sporting environments (Gavriel-Fried et al., 2021). It has become exacerbated by frequent advertising for sports betting during live games, leading to increased gambling frequency by adolescents and young adults (Howe et al., 2019). Gambling is portrayed as glamorous, exciting, and a social activity (Howe et al., 2019), and growing evidence suggests that advertising helps to normalise gambling into social and cultural practices (Nyemcsok et al., 202; O’Brien & Iqbal, 2019). Gambling marketing centres on embedding the activity within an Australian culture that values sport and mateship.

Particular impacts on children and young people

Normalisation of gambling in sporting culture presents a particular problem for children and young people (Pitt et al., 2022). The WHO-UNICEF Lancet Commission, *A future for the world's children?*, has drawn attention to research revealing that gambling is already normalised for children, with 75% of young people surveyed across the United Kingdom (UK) and Australia agreeing that gambling is a normal part of sport (Pitt et al., 2022). Further, concerns about gambling advertising impacts during sport led UNICEF Australia to urge the Australian government to tighten regulations associated with gambling advertising, suggesting, “this policy issue has an undeniable and significant impact on children” (UNICEF, 2018). An Australian study explored young people’s reflections on factors contributing to the normalisation of gambling with findings revealing the pervasive nature of gambling advertising (Nyemcsok et al., 2021). A 13-year-old boy said, “A few years ago, you would see one or two ads, and now everywhere you watch there are ads.” while a 16-year-old girl commented, “I agree it’s become more mainstream – people care about it a lot more because of all the ads” (Nyemcsok et al., 2021, p 168).

Increasing number of advertising exposure sites for children

The increasingly present promotion of an adult product, gambling, in everyday settings routinely frequented by children and young people is highly concerning. A New Zealand (NZ) study (Smith et al., 2020) suggested that gambling advertising rules should not be limited to TV-only restrictions due to the vast range of environments where children are exposed. A similar NZ study revealed that outdoor gambling marketing was commonly clustered in outdoor places frequented by children and adolescents but not necessarily known as child places (Liu et al., 2022). This included towns and shopping centres outside alcohol and gambling outlets and were rated as high-exposure sites where school children frequent and a hot spot where harmful marketing is clustered (Liu et al., 2022). In addition to outdoor exposure to gambling advertising, children can be exposed to advertising at home during sporting games, not only through TV advertisements but through sponsorship logos on uniforms and social media (Smith et al., 2020; Liu et al., 2022). AFL is one of the most popular spectator sports in Australia, and betting companies commonly sponsor AFL teams with their logo often appearing on a uniform or surrounds of the game (Sartori et al., 2018).

Loopholes in current advertising restrictions

Outside of the regulations detailed on the Australian Communications and Media Authority (ACMA) website, the ACMA recommends parental responsibility to protect children from viewing gambling advertising during live sport streamed over the internet, stating, “to protect children from gambling, always use internet filtering options”. The website also states, “*check when and where gambling ads can be broadcast*” and “*ensure a responsible adult supervises their television and radio time*” to protect children from harmful gambling advertising during TV viewing (ACMA, n.d). Whilst this is a reasonable disclaimer for the ACMA to make, it suggests the current restrictions on gambling advertising to protect children and others from gambling harm are not as effective as they should be and are not sufficiently enforced. It is unrealistic for parents to have constant control over what their child is exposed to or interpret complicated and inconsistent rules. Children do not only view children’s TV programs, but many families also watch TV together across news, current affairs, and sporting games. There is an overarching theme in relation to the gambling industry, which mirrors that of other public health areas which deal with commercial determinants, namely the prioritisation of corporations, money and power over harm to individuals and society.

There is much discussion on sports betting companies' ability to engage sporting viewers' interest in live sports even when following the rules. In the ACMA rules, bookmakers can advertise outside of 5 minutes before and after the game. The rules state that promotion of *betting odds* is not allowed during breaks in play but do not state that general advertising for sports betting is not allowed during breaks such as halftime (ACMA, n.d). Therefore, there is still an overwhelming amount of gambling advertising before, during halftime, and after games, all which risk child exposure.

The ACMA reports Channel 7 and Channel 9 have recently breached the rules for gambling advertising, revealing that Channel 7 “*aired 49 betting promotions during its Olympic coverage*” (ACMA, 2022). One channel received a formal warning about the breaches, and the other is required to implement new systems to avoid breaking the rules, report back on the effectiveness of new practices, and report complaints about gambling advertisements (ACMA, 2022). This suggests that the consequences to stations for not enforcing the rules may not be tough enough and that the desire for significant profit from sports betting companies paying to advertise on more occasions outweighed the risk of breaking the rules.

Other governments' interventions

In response to COVID-19 potentially increasing gambling activities, countries including the UK, Latvia, and Spain passed legislation restricting gambling advertising and limiting gambling deposit amounts (Håkansson, Sundvall, & Lyckberg, 2022). France and Brazil have implemented more substantial restrictions on all gambling advertising in public spaces to reduce children’s exposure to shopfronts and other public signs in the community. Local Governments have a role to play in this (Smith et al., 2020).

RECOMMENDATIONS

Policymakers and media outlets must recognise and be accountable for the normalisation and culture of gambling created by advertising, its effect on children, and its priority of profit over health. There is a need for increased and tighter restrictions on gambling advertising across all forms of media and exposure sites considering the fast and changing landscape of gambling and technology advancements. Public and School education is necessary but not sufficient to combat pervasive advertising and norms and the impacts of the commercial and social determinants of health. Individuals alone cannot make informed or 'healthy' choices, not take personal responsibility for their health in environments that inherently bad for health. As reflected in other Australian research findings regarding government intervention in public health, the level of public acceptability of government interventions on health-related behaviours depends on the level of intrusion in people's lives. Often, the least intrusive measures are most acceptable; however, these are also the least effective (Crawford et al. 2021). Hoek (2015) has argued that state intervention maintains and defends individual freedoms against commercial interests *"which potentially pose a much greater threat to free and informed choice"*(p1042).

Public health colleagues Thomas, Pitt and Daube have suggested that if we apply the principle of 'logic based on parallel evidence' (as cited in McKinsey Global Institute. Overcoming obesity: An initial economic analysis, 2014), to significantly reduce young people's exposure to gambling advertising we must apply the comprehensive approach used in other public health initiatives (such as tobacco control), using restrictions on advertising, promotion and sponsorship to significantly reduce harms (Thomas et al., 2019).

Specifically, AHPA supports the following recommendations:

1. Ban all TV and radio gambling advertising until after 8:30pm. This should be a blanket restriction across free-to-air or paid TV and radio, irrespective of ratings or type of station or content. Timing of restrictions must be cognisant of and mitigate time differences across the country.
2. Extend restrictions on advertising in public spaces to places where children and adolescents frequent but are not typically known as children's environments such as outside alcohol and gambling outlets and shopping centres.
3. Involve young people in consultation for developing public health responses to gambling.
4. Ban gambling sponsorship at sporting events and on sport uniforms.
5. Implement tight restrictions for online gambling advertising to prevent exposure to children and young people whilst online.
6. Provide resources for public health-led research into gambling harms free from industry influence.
7. Establish a national public health-led coalition to reduce gambling harms with a focus on evidence informed policy, regulation and service delivery.

Yours sincerely



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