GAMBLING MARKETING AND THE PREMIER LEAGUE: THE CONTINUED FAILURE OF INDUSTRY SELF-REGULATION.

The 2nd Annual Research Report into the Prevalence of Gambling Marketing during the Opening Weekend of the English Premier League.

September 2024





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1 | EXECUTIVE SUMMARY

ABOUT THIS RESEARCH

This project has, for the second consecutive year, explored the prevalence of gambling marketing across televised football matches, sports news programming, radio and social media during the opening weekend of this season's Premier League. Using the same techniques and methods as the last report, this project focused on four main areas:

- Live Televised Coverage Analysis: A frequency analysis of gambling marketing during live broadcasts of Premier League fixtures in the UK from 16th to 19th August 2024.
- Sky Sports News Analysis: An assessment of the frequency of gambling marketing during Sky Sports News broadcasts on 17th August 2024, from 6.00am to 9.00pm.
- TalkSport Radio Analysis: An examination of gambling marketing frequency during TalkSport radio broadcasts on 17th August 2024, from 6.00am to 9.00pm.
- Social Media Analysis: An evaluation of gambling advertising disseminated by the UK's ten largest gambling operators across Facebook, Instagram, and Twitter/X from 16th to 19th August 2024.

Utilising validated codebooks from previous research, the investigation included approximately 24 hours of live match coverage, 15 hours of Sky Sports News coverage, 15 hours of TalkSport radio broadcast, and an analysis of gambling advertising posted on social media platforms during the opening weekend.

IMPLICATIONS

For the second consecutive year, this report highlights the volume of gambling marketing that is present within English football. Once more, the report highlights how the self-regulation of gambling marketing that is supposed to be protecting football supporters from gambling harms is ineffective.

Across our TV, radio and social media analysis, the research found a drastic increase of gambling marketing compared to last year – from 10,999 to 29,145 gambling messages. These messages consisted of gambling logos – or other gambling references – exposed on television, radio, and social media. The findings underscore a significant failure of self-regulatory measures effectively designed to curb gambling marketing associated with football. This trend indicates that these self-imposed regulations, while acknowledging the potential harms of gambling marketing, have proven largely symbolic and ineffective in protecting football supporters from pervasive exposure to gambling marketing.

Indeed, the failures of current self-regulatory measures are evident in several key areas. Only 8.3% of gambling messages during live broadcasts appeared on the front of shirts, suggesting that the 2026 front-of-shirt ban would not substantially reduce the overall volume of gambling marketing during live matches. Similarly, a total of 10,027 gambling messages were recorded during the "whistle-to-whistle" ban period, highlighting the ineffectiveness of this measure in limiting exposure to gambling marketing. The newly introduced sponsorship Code of Conduct also failed to reduce gambling marketing volume, which has more than doubled since its implementation. Finally, 74% of content marketing ads sent by major gambling brands were not clearly identifiable as advertising, breaching key advertising regulations.

RECOMMENDATIONS

Given the repeated failure of industry-led regulations, we strongly recommend that the Government utilise the existing powers given under the Gambling Act 2005 which state that "The Secretary of State may make regulations controlling the advertising of gambling", to regulate gambling marketing in the Premier League.

Such provisions should include:

- A Comprehensive "Whistle-to-Whistle" Ban:
 Enforce a ban covering all forms of gambling marketing during sporting events, including commercials, shirt sponsorship, pitchside hoardings, and associated media like social media and radio.
- Mandated Responsible Gambling Messaging:
 Require all gambling marketing to include clear
 messages about the harms of gambling, with legal
 standards for size, prominence, and duration.
- Ban on Gambling Content Marketing:
 Prohibit gambling content marketing that breaches advertising regulations and appeals to children, ensuring better protection for vulnerable audiences.

HEADLINE FINDINGS

Beyond an extremely high volume of gambling marketing, the present study shows that the industry is not capable of effectively regulating its own marketing practices. Neither the "whistle-to-whistle" ban, the front-of-shirt sponsorship ban, nor the sponsorship Code of Conduct have been shown to have any meaningful impact on reducing the volume of gambling marketing associated with sports consumption.

29,145

TOTAL GAMBLING **MESSAGES IDENTIFIED**

INCREASE IN GAMBLING **MESSAGES**

165%

A TOTAL OF 29,145 GAMBLING MESSAGES WERE IDENTIFIED ACROSS THE FOUR MEDIA CHANNELS DURING THE OPENING WEEKEND. ILLUSTRATING THE PERSISTENCE AND PERVASIVENESS OF GAMBLING MARKETING IN FOOTBALL.



THE NUMBER OF GAMBLING MESSAGES DURING THE OPENING WEEKEND MORE THAN DOUBLED COMPARED TO LAST SEASON, RISING FROM 10,999 TO 29,145, HIGHLIGHTING A SIGNIFICANT SURGE IN EXPOSURE.

GAMBLING

MESSAGES DURING SIX MATCHES 23,690

6,491

GAMBLING MESSAGES DURING A SINGLE MATCH



WITHIN THE LIVE BROADCASTS OF SIX MATCHES BROADCAST DURING THE OPENING WEEKEND, 23,690 GAMBLING MESSAGES WERE RECORDED, MARKING OVER A THREEFOLD INCREASE COMPARED TO THE 6,966 MESSAGES RECORDED DURING THE SAME PERIOD LAST YEAR.

THE MOST PROLIFIC MATCH -WEST HAM UNITED V ASTON VILLA - CONTAINED 6.491 GAMBLING MESSAGES, WITH MESSAGES BEING PRESENT IN OVER 50% OF THE TOTAL LIVE BROADCAST.

FINDINGS

8.3%

ONLY 8.3% OF GAMBLING MESSAGES DURING LIVE MATCH BROADCASTS WERE ON THE FRONT OF SHIRTS. UNDERSCORING THAT THE FRONT-OF-SHIRT BAN SET FOR THE END OF THE 2025/2026 SEASON WILL NOT SUBSTANTIALLY REDUCE THE OVERALL VOLUME OF GAMBLING MARKETING. FRONT-OF-SHIRT **EXPOSURE**



MESSAGES DURING THE "WHISTLE-TO-WHISTLE" BAN



10,027

OVER ONE THIRD (10,027) OF ALL GAMBLING MESSAGES WERE RECORDED DURING THE INDUSTRY'S "WHISTLE-TO-WHISTLE" BAN, HIGHLIGHTING THE INEFFECTIVENESS OF THIS SELF-REGULATION.

24 MILLION **IMPRESSIONS ON** SOCIAL MEDIA



24N

SOCIAL MEDIA GAMBLING ADS GENERATED 24 MILLION IMPRESSIONS (I.E., THE NUMBER OF TIMES AN AD WAS VIEWED), DEMONSTRATING THE REACH OF SOCIAL MEDIA AS A PLATFORM FOR GAMBLING ADVERTISING.

74%

OUT OF 305 CONTENT MARKETING ADS SENT BY MAJOR GAMBLING BRANDS, 74% WERE NOT CLEARLY IDENTIFIABLE AS ADVERTISING THEREFORE BREACHING KEY ADVERTISING REGULATIONS. OF CONTENT MARKETING ADS **BREACH ADVERTISING** REGULATIONS.



2 | INTRO & BACKGROUND

This study has, for the second consecutive year, explored the prevalence of gambling marketing across televised matches, sports news programming, radio and social media to help track changes in the prevalence of gambling marketing during the opening weekend of the Premier League. Marketing via sport can include a wide variety of strategies (Cornwell & Jahn, 2023; Smith, 2012), including stadium naming rights, acting as an official supplier, or the sponsorship of teams, leagues, or events, where a business such as a gambling operator makes "an investment, in cash or in kind, in an activity, in return for access to the exploitable commercial potential associated with that activity" (Meenaghan, 1991, p. 36). Sponsorship is commonly used by businesses as a marketing tool at sporting events to reach a wide audience with their brand (Hsiao et al., 2021), and gambling companies sponsor football clubs and leagues to target football consumers with their brand. Gambling marketing – or the marketing of gambling brands - can be seen through many different formats in the English Premier League, including television commercials, shirt sponsorship, matchday programmes, and on pitchside hoardings (Rossi et al., 2023; Sharman et al., 2020). Additionally, gambling operators advertise their products across social media to widen the reach of their products, a strategy that may also pose particular risk to children and other vulnerable audiences (Singer et al., 2024). For the purpose of this report, we use the term "messages" to cover all of these marketing activities.

With this in mind, our aim is to create a longitudinal dataset, with four annual reports between 2023 and 2026, to help track changes in the prevalence of gambling marketing during the Premier League. By doing so, we intend to assess how regulatory interventions - such as the new Sponsorship Code of Conduct (Premier League, 2024a) - impact the volume of gambling marketing during football matches. In this year's report, we use the same methodology as last year, to shed light on the extent of gambling marketing across four different platforms: live match broadcasts, Sky Sports News, TalkSport radio, and social media.

The presence of gambling marketing has grown since the onset of the Gambling Act 2005, the legislation that permits gambling marketing in the

UK (HM Government, 2005). Indeed, the gambling sector in the UK spends £1.5 billion on marketing every year (Regulus Partners, 2018). Football itself has experienced a vast increase in the volume and penetration of gambling marketing (Lopez-Gonzalez & Griffiths, 2018). Recent research has found that the 30 matches of the FIFA Men's World Cup 2022 that were aired on ITV featured 156 commercial adverts shown from eight different operators (Sharman et al., 2023), while one Premier League match during the 2022/2023 season contained 3,522 individual gambling brand logos (Torrance et al., 2023). Termed the 'gamblification' of football (Lopez-Gonzalez & Griffiths, 2018, p. 405), gambling has infiltrated football, with the gambling sector aiming to influence the consumer experience of the sport by encouraging engagement with their brands and products. Gambling brands have become synonymous with English football, and marketing strategies have included the sponsorship of leagues (for example, the Sky Bet Championship), clubs (through sponsorship and advertising that is present on shirts and pitchside hoardings), and television broadcasting (Torrance et al., 2023; Rossi et al., 2023). Consequently, while the gambling sector may provide a revenue stream to clubs, there is a consensus across researchers that there is a need for tighter regulation to protect stakeholders, including football supporters, especially children and young people, from gambling harms (Torrance et al., 2023; Wheaton & Ford, 2024). Gambling harms can be defined as the adverse impact from gambling on the health and wellbeing of individuals, families, communities and societies (Wardle et al., 2018).

Existing Regulations

Gambling marketing in the UK is mainly regulated through industry self-regulation. Prominent measures include the Premier League's (2023) decision to voluntarily remove gambling sponsors from the front of shirts at the end of the 2025/2026 season, and the gambling industry's voluntary "whistle-to-whistle" ban on televised gambling ads (Industry Group for Responsible Gambling, 2020). This "whistle-to-whistle" ban prohibits gambling commercials from appearing during a period starting five minutes before kick-off, and ending five minutes after the final whistle, before 9pm, effectively removing gambling commercials from the half-time coverage.

However, these self-regulatory measures have been found to be ineffective. Previous studies have shown that front-of-shirt sponsorship only accounts for between 6% (Torrance et al., 2023) and 9% (Rossi et al., 2023) of gambling marketing exposure. Similarly, our study last year found that over 7,000 gambling messages were disseminated across different media during the "whistle-to-whistle" ban period (Rossi et al., 2023), while another found that the ban resulted in an increase of gambling commercials during unrestricted sections of broadcasts following its implementation (McGrane et al., 2024).

New Self-Regulation Introduced

In recognition of the harms related to gambling and against the backdrop of the UK Government's review of the Gambling Act 2005, additional self-regulation has been introduced since our previous study. Specifically, a new, voluntary Code of Conduct has been introduced by key stakeholders in the football industry, specifically the Football Association, the Premier League, the English Football League, and the Women's Super League. Together, they have published a Code of Conduct for sponsorship partnerships with gambling operators (Premier League, 2024a). These stakeholders published the Code after committing - alongside other sports bodies - to adhere to a set of principles after the publication of the UK Government's White Paper (Department for Culture, Media & Sport, 2023). These four principles are: protection, reinvestment, social responsibility and integrity. Of particular importance to our study are the principles of protection and social responsibility.

In summary, the principle of protection means that clubs are required to ensure that "the design of gambling sponsorship as part of Gambling Related Agreements limits its reach and promotion to children, and those at risk of gambling related harm" (Premier League, 2024a, p.2). Gambling-related sponsors, for example, need to be removed from replica kits designed for children, while areas of stadia specifically designed for families and children should not contain any gambling-related marketing. In addition, the principle of social responsibility requires that "a reasonable and proportionate portion of gambling sponsorship inventory promotes responsible

gambling messaging, which may include social media posts, websites, perimeter boards and/ or match day programmes. Sponsorship should include a commitment to meaningful responsible gambling messaging" (Premier League, 2024a, p. 4). There is no guidance, within the Code, however, on what constitutes a "reasonable and proportionate portion." In summary, the new Code has implications for the present study as it is intended to limit the reach of gambling messages to protect children and vulnerable audiences, whilst a "reasonable" proportion of gambling messages should be accompanied by responsible gambling messaging.

Increased Gambling Sponsorship in 2024/2025

A further notable change since the 2023-2024 season is that the number of football clubs that have sponsorship agreements with gambling companies has increased from eight in 2023/2024 to eleven in 2024/2025 (Gamp, 2024). Gamp's (2024) recent report also highlights the financial implications of this increase for Premier League clubs, with clubs set to receive over £500 million in sponsorship income from operators in 2024/2025. While there is an acknowledgement among Premier League clubs that exposure to gambling marketing should be reduced through the Code of Conduct (Premier League, 2024a) and the forthcoming removal of front-of-shirt sponsorship (Premier League, 2023), exposure could increase in the 2024/2025 season - highlighting the tensions of self-regulation.



3 | **AIMS**

Our study continues the work reported last season (Rossi et al., 2023), exploring the prevalence of gambling marketing in the Premier League and the efficacy of current regulations designed to reduce exposure of gambling marketing, and is one of the first series of studies to contribute a longitudinal perspective on this exposure. Specifically, our study sought to achieve the following aims:

1

To measure the prevalence of gambling marketing on sports-related media during the opening weekend of the Premier League 2024/2025.

2

To assess the current regulatory environment relating to gambling marketing and football - such as the "whistle-to-whistle" ban, the football sector's voluntary Code of Conduct, the voluntary removal of front-of-shirt sponsorship, and social media advertising regulations.



To compare the volume of gambling marketing found this year with last year's results, thus tracking changes in the techniques deployed by operators when marketing via the Premier League.

4 | METHODOLOGY

4.1 TELEVISED FOOTBALL MATCHES

To investigate the prevalence of gambling marketing during football matches, we employed the same approach as in our initial study last year. Our codebook - an instrument we used to record each instance of gambling marketing - was initially inspired by Purves et al.'s (2020) study of gambling marketing exposure during televised sporting events. This year's codebook was subject to only minor adaptations to 1) ensure the collection of longitudinal data that can be compared with last season's findings, and 2) reflect the current marketing techniques used by gambling operators in the English Premier League. Full definitions of the variables we measured can be found in the Technical Appendix. The variables we measured were timing of gambling message appearance, format, duration of gambling message(s) in seconds, number of identical messages, gambling brand featured, type of gambling referenced, whether the gambling message is generic or indirect reference, and the presence of a harm reduction or age restriction message. The options available for messages to be coded under 'format' were amended slightly to capture messages that appeared on static pitchside hoardings, electronic pitchside hoardings (both full or part), clothing worn by supporters, the front of a player's shirt, the sleeve of a player's shirt, integrated graphic, sponsorship lead-in, commercial advertisement break, interview or press conference, stadium structure, and 'other' to capture anything else. The number of identical references followed Purves et al.'s (2020) approach, capturing the maximum number of logos per format that were visible during each individual camera shot.

We analysed the six Premier League matches that were broadcast live in the UK during the opening weekend of the 2024/2025 season. All televised matches across the weekend were selected to ensure that all live football from this period was analysed, reflecting the prevalence of marketing during a period when viewership was likely to be high. These matches are introduced in Table 1. Our analysis incorporated the entire broadcast for each match, including the match itself, pre- and post-match studio discussions, half-time studio discussions, and advertising breaks. The length of each broadcast varied due to the demands of the broadcasting schedule over the weekend. For example, the broadcasts of matches between Manchester United and Fulham and Leicester City and Tottenham Hotspur were longer due to the greater length of pre- and post-match discussion time available during the evening schedule. Meanwhile, the length of the broadcast of the match between West Ham United and Aston Villa was shorter due to it following coverage of matches that kicked off at 3pm in the UK. The broadcast lengths of the matches between Brentford and Crystal Palace, and Chelsea and Manchester City were shorter. This reflected the shorter pre- or post-match discussion periods for either match given the close proximity of their kick-off times. The total length of all footage analysed was 23.5 hours (compared to 24.1h last year).

We hired a team of research assistants to conduct the recording - or coding of - gambling messages exposed during each broadcast into separate versions of the codebook. To ensure agreement across coders, we first held training on the use of the codebook as well as a joint pilot session where

Table 1: Details of the televised matches during the opening weekend of the Premier League season

Match	Date and kick-off time	Broadcaster	Length of footage analysed
Manchester United v Fulham FC	Friday 16th August, 8.00pm	Sky Sports	269 minutes, 41 seconds
Ipswich Town v Liverpool FC	Saturday 17th August, 12.30pm	TNT Sports	257 minutes, 6 seconds
West Ham United v Aston Villa	Saturday 17th August, 5:30pm	Sky Sports	213 minutes, 53 seconds
Brentford FC v Crystal Palace	Sunday 18th August, 2.00pm	Sky Sports	187 minutes, 30 seconds
Chelsea FC v Manchester City	Sunday 18th August, 4:30pm	Sky Sports	208 minutes, 21 seconds
Leicester City v Tottenham Hotspur	Monday 19th August, 8.00pm	Sky Sports	279 minutes, 2 seconds

coders completed coding as a team exercise during a short amount of footage. They then independently coded the same 10 minutes of footage. Agreement across variables was measured by Krippendorff's Alpha, a measure designed to assess levels of agreement across multiple researchers (Hayes & Krippendorff, 2007). A score of 0.66 indicates acceptable agreement between researchers. Our initial exercise found that Krippendorff's Alpha scores measured strongly between 0.7 and 1.0 for the coders across all variables (for example, format, name of brand, presence of harm reduction message). Having established acceptable levels of agreement, the coders proceeded to code matches individually, discussing queries with the research team.

4.2 SKY SPORTS NEWS

In keeping with last season's study, we also analysed the prevalence of gambling marketing during a day of Sky Sports News, a commercial sports news channel broadcast in the UK. Specifically, we analysed coverage on Saturday 17th August 2024, from 6am-9pm. Sky Sports News - and its flagship programme, Soccer Saturday – is watched by football supporters who are keeping track of scores on a Saturday afternoon (Sky Group, 2023), particularly as games kicking off at 3pm are not permitted to be televised in the UK by current regulations (UEFA, 2022). The inclusion of Sky Sports News therefore ensured the analysis of Premier League matches that, while not broadcast live in the UK, were still covered and televised via highlights on Sky Sports News. For example, in the case of Newcastle United versus Southampton, this game was not broadcast live due to being a 3pm kick-off, and so coverage and updates from the match were available through Sky Sports News.

The codebook for Sky Sports News was also only modified slightly from last year's version to ensure that 1) the collection of longitudinal data is comparable across different years and 2) to reflect the current marketing techniques used by gambling operators that might be encountered during news coverage. Full definitions of the variables (for example, time of gambling message, duration in seconds, format, and so on) that were measured can be found in the Technical Appendix. Specifically, in addition to the variables measured in the match codebook, an additional 'Match Highlights' variable measured if gambling messages appeared

as part of match highlights, while the 'Format' variable included the option of 'spoken reference', measuring whether gambling had been mentioned during studio-based or reporter-led discussions. Given the similarity of the codebooks, intercoder reliability was established as mentioned earlier, with coders proceeding to individually analyse sections of the Sky Sports News coverage.

4.3 TALKSPORT RADIO

The commercial radio station TalkSport was included again due to its coverage of the English Premier League. Launched in 2000, TalkSport introduces itself as "the world's biggest sports radio station" (TalkSport, 2018). For TalkSport radio, we utilised the same codebook as last year (see Rossi et al., 2023) to analyse the prevalence of gambling advertising that occurred during Saturday 17th August, from 6am to 9pm. The format variable included sponsorship lead-in, advertisement break, spoken reference, and other. Informed by Purves et al.'s (2020) study, we captured the duration, number of gambling messages heard, the brand that was referenced, and the type of gambling (e.g. sports betting, gaming/slots, lottery, bingo or casino), as well as whether the message was accompanied by a harm reduction or age restriction message. Further details of the variables can be found in the Technical Appendix. Two research assistants analysed the TalkSport radio content and intercoder reliability was established as the coders both coded 20 minutes of coverage. Krippendorff Alpha scores again indicated acceptable agreement between coders, with scores of between 0.7 and 1.0 achieved across all variables (see Hayes & Krippendorff, 2007).

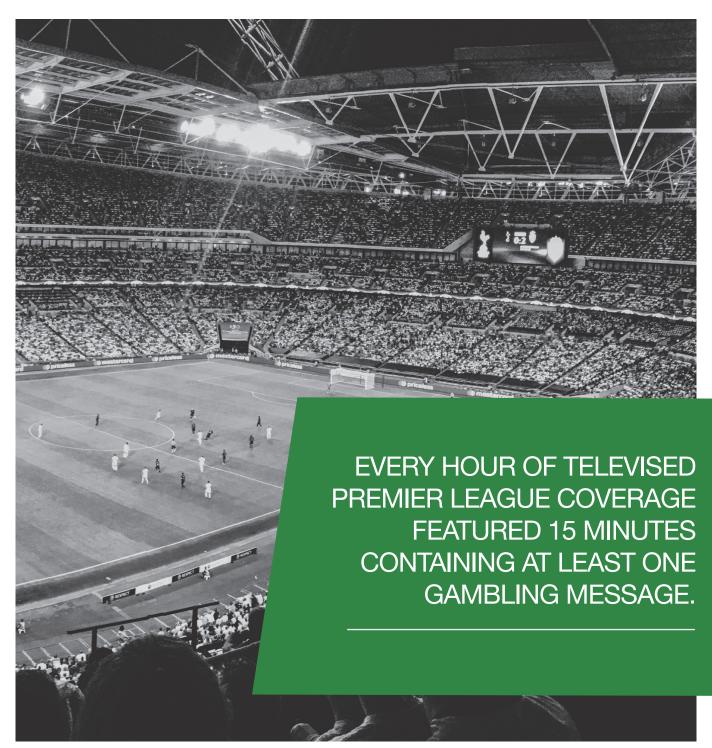
4.4 SOCIAL MEDIA

For social media advertising, we utilised the same social media analysis codebook as last year, making only minor modifications to ensure comparability across different years. This codebook is based on previous research (see Houghton et al., 2019; Rossi et al., 2021, 2023). Like in our previous study, we explored paid-for advertising which allows for precise targeting based on demographics and user data, as well as organic advertising which relies on engaging content that users are motivated to share (Rossi & Nairn, 2022).

For paid-for gambling ads, we focused on the ten largest social media profiles among GB-licensed

gambling accounts, including Bet365, Betfred, Betfair, BetVictor, Coral, Ladbrokes, Sky Bet, Paddy Power, Unibet, and William Hill, which collectively have over 10 million followers. Following last year's approach, we used the Meta Ad Library to monitor and capture screenshots of active ads on Instagram and Facebook from these accounts between 16th and 19th August 2024. As opposed to last year, we counted all active ads paid-for as one ad – irrespective of their duration. This was necessary due to changes in the Meta Ad Library. This means, however, that the number of paid-for ads cannot be compared to last year's findings, as last year each

paid-for ad was counted on a daily basis (e.g. one ad could have been live for four days – resulting in four entries; this year, this ad would count as one entry). For organic gambling ads, our approach aligned with previous studies on gambling marketing (Houghton et al., 2019; Singer et al., 2023) and concentrated on Twitter/X, the user base of which shows a fairly balanced age demographic with 30% of its users aged 18-29, 25% aged 30-49, and 20% aged 50 and older (Pew Research Center, 2023). We recorded and analysed all organic ads posted by the ten gambling accounts that were posted during the Premier League weekend (16th to 19th August).



5 | **RESULTS**

In total, our study uncovered 29,145 gambling messages during the opening weekend of this season's English Premier League, a substantial increase over last season's total of 10,999. The breakdown of gambling marketing found according to each medium analysed during this year's study is presented in Table 2. This section introduces the findings of each research activity in turn, starting with the televised matches, before moving on to Sky Sports News, TalkSport Radio, and social media.

Table 2: Gambling messages found during the opening weekend.

FORMAT	Date	Total time analysed	Average gambling message per hour	No. of gambling messages
Match Broadcast	16th – 19th August	23.553 hours	1,005	23,690
Sky Sports News	17th August	15 hours	288	4,332
TalkSport Radio	17th August	15 hours	14	214
Social Media	16th – 19th August	96 hours	10	909
TOTAL				29,145

5.1 TELEVISED FOOTBALL MATCHES

Our analysis of the six televised matches found a total of 23,690 individual gambling messages, recorded over a total of 3,002 individual frequencies (entries into the codebook). The full results are detailed in Table 3. The highest number of messages was found during West Ham-Aston Villa (6,491 messages during 888 frequencies), Leicester City-Tottenham Hotspur (5,156 messages during 657 frequencies), and Ipswich Town-Liverpool (4,464 messages during 240 frequencies). These three matches also contained higher-than-average gambling messages per broadcast minute (16.74 across the entire sample). The average duration during which messages stayed on-screen - an average of 7.73 seconds across the sample was longest during the Ipswich Town-Liverpool (11.14 seconds).

Analysis of the timestamps of individual frequencies and the duration of references found that **just under a quarter – 23.8% - of the total sample of broadcasts featured at least one gambling message.** In summary, every hour of televised Premier League coverage featured 14.26 minutes containing at least one gambling message. This was highest during the West Ham-Aston Villa match, where **every hour of coverage featured an average of 31.30 minutes containing at least one gambling message.**

Of the total messages, 9,368 – or 39.5% – occurred during the industry's "whistleto-whistle" ban. This percentage was highest during the matches where both teams carried a gambling operator as their principal sponsor, namely the West Ham-Aston Villa match (66.5%) and the Brentford-Crystal Palace match (53.2%). There were also above average "whistle-to-whistle" period messages during the Ipswich Town-Liverpool (43.6%) match. This percentage was lower during the Chelsea-Manchester City match (10.0%) where neither team carried principal sponsorship from a gambling operator, and the Manchester United-Fulham (10.7%) match, where the "whistle-to-whistle" ban ended at half time.



Table 3: Selected results from the analysis of the televised Premier League matches

Variable	Manchester United v Fulham FC	lpswich Town v Liverpool FC	West Ham United v Aston Villa	Brentford FC v Crystal Palace	Chelsea FC v Manches- ter City	Leicester City v Tottenham Hotspur	Total
Total number of frequencies*	370	240	888	705	142	657	3,002
Total number of gambling messages**	3,072	4,464	6,491	2,702	1,805	5,156	23,690
Average number of gambling messages per broadcast minute	11.39	17.33	30.47	14.41	8.78	18.48	16.74
Average duration of gambling messages (seconds)	3.99	11.14	9.94	5.40	8.14	8.01	7.73
Total duration of broadcast featuring at least one gambling message (minutes)	24.45	44.38	111.17	54.47	19.27	82.70	336.43
Percentage (%) of broadcast (minutes) featuring at least one gambling message.	9.1%	17.2%	52.2%	29.1%	9.3%	29.6%	23.8%
Percentage (%) of messages occurring during the "whistle-to-whistle" period	10.7%	43.6%	66.5%	53.2%	10.0%	22.5%	39.5%
Most common formats (% of messages)	Sponsor- ship lead-in (70.8%)	Sponsor- ship lead-in (45.9%) Electronic pitchside full (44.0%)	Static pitchside (51.6%) Sponsor- ship lead-in (14.8%)	Sponsor- ship lead-in (37.9%) Electronic pitchside full (28.7%)	Sponsor- ship lead-in (78.0%)	Sponsor- ship lead-in (44.7%) Electronic pitchside full (37.7%)	Sponsor- ship lead-in (42.7%) Electronic pitchside full (25.1%)
Most common brands % of messages)	Bet365 (75.0%)	Bet365 (62.7%)	Betway (72.5%) Bet365 (21.7%)	Bet365 (40.7%) Hollywood Bets (27.7%)	Bet365 (85.1%)	Bet365 (45.6%) BC.GAME (31.6%)	Bet365 (48.5%) Betway (22.3%)
Most common formats of gambling referenced (% of messages)	Logo only (95.4%)	Logo only (93.9%)	Logo only (78.2%) Sports bet- ting (21.8%)	Logo only (94.9%)	Logo only (99.6%)	Logo only (65.1%) Sports bet- ting (34.9%)	Logo only (84.1%) Sports bet- ting (15.6%)
Harm reduction message (% individual frequencies)	Yes (8.1%)	Yes (53.8%)	Yes (13.3%)	Yes (14.3%)	Yes (18.6%)	Yes (21.8%)	Yes (18.4%)
Age restriction message (% of individual frequencies)	Yes (7.8%)	Yes (15.0%)	Yes (2.0%)	Yes (2.0%)	Yes (18.6%)	Yes (22.5%)	Yes (8.7%)
*Individual gambling frequency refers to each instance of gambling marketing logged in the codebook.							

^{**}Identical messages refer to the maximum number of identical logos visible per frequency.

The most prevalent format of gambling messages found across the sample was that of 'sponsorship lead-in', accounting for 42.7% of all messages. These sponsorship lead-ins – wholly featuring Bet365 – were shown in segments linking commerical breaks and the main coverage outside of the "whistle-to-whistle" ban period. Importantly, the sponsorship lead-in – an example of which is featured in Figure 1 – featured an athlete playing in a virtual stadium with hoardings containing 128 individual Bet365 logos. While the sponsorship lead-ins were the most prevalent form of messages found, the total number of messages without sponsorship lead-ins (13,578) still amount to almost double the total of messages found across the six matches during last season's study (6,966).



The second most prevalent form of messaging matches across the entire sample was 'electronic pitchside full' which are messages that cover the entirety of the electronic pitchside hoardings, accounting for just over a quarter (25.1%) of all messages. Full coverage of gambling messages across electronic pitchside hoardings – an example of which is introduced in Figure 2 – were prominent during the Ipswich Town-Liverpool (44.0%), Brentford-Crystal Palace (28.7%), and Leicester City-Tottenham Hotspur (37.7%) matches.



Importantly, the main format of messages in the West Ham-Aston Villa match was that of 'static pitchside' (51.6%), or messages that appeared on pitchside hoardings that were not electronic and therefore remained as a constant presence during the match itself. This explained the above average length of broadcast that featured at least one gambling message encountered during the West Ham-Aston Villa match. Introduced in Figure 3 below, the static pitchside messages reflected the sponsorship agreement between Betway and West Ham United.

Despite the six matches featuring six teams with shirt-based sponsorship, logos on players' shirts formed a small proportion of messages across the

Figure 1: Example of Bet365 Sponsorship lead-in. Note that logos are visible on the player's shirt, on the big screens, and on hoardings visible on four different levels (including pitchside and in the stadium structure). Responsible gambling and age restriction messages are also visible (Manchester United v Fulham, Sky Sports, 16th August 2024).

Figure 2. Example of gambling messages covering all electronic pitchside hoardings. In this example, BC.Game logos are present on all electronic hoardings during Leicester City v Tottenham Hotspur (Leicester City v Tottenham Hotspur, Sky Sports, 19th August 2024).



Figure 3: Static pitchside messages during West Ham United v Aston Villa. Note: Betway logos were visible during the entire match on static pitchside messages such as those seen here behind the goal and by the side of the pitch (West Ham United v Aston Villa, Sky Sports, 17th August 2024).

sample. Gambling logos on the front of players' shirts accounted for 8.3% of messages, while those on players' sleeves accounted for 0.5% of messages. Indeed, the broadcast of the match between Ipswich Town and Liverpool contained more messages than that between Brentford and Crystal Palace, despite Brentford and Crystal Palace both wearing logos on their shirts compared to Ipswich Town and Liverpool, who wore none.

Bet365 was the most prominent brand across the sample accounting for 48.5% of messages, reflecting its presence in sponsorship lead-ins, commercials, and upon pitchside advertising hoardings. The presence of other brands reflected their sponsorship agreement with respective clubs. For example, **Betway** was the most prominent brand during the West Ham-Aston Villa match (72.5%), **Hollywood Bets** (27.7%) featured heavily during the Brentford-Crystal Palace match, as did **BC.Game** (31.6%) during the Leicester City-Tottenham Hotspur match.

The vast majority of messages across the sample were 'logo only' (84.1%), with sports betting (15.6%) appearing occasionally. References to sports betting mainly occurred during the West Ham-Aston Villa (21.8%) and Leicester City-Tottenham Hotspur (34.9%) matches. Specific gambles were rarely mentioned across the sample with only 0.1% of messages related to specific markets or bets, while no messages at all were indirect or generic references to gambling. This meant that all messages that were recorded were attributed to a specific brand.

Just under a fifth – 18.4% - of the frequencies across the sample contained responsible gambling messages. These messages were wide-ranging, including the small-print messaging within the Bet365 sponsorship lead-in, and messages encouraging responsible gambling behaviours such as "bet the responsible way" during Betway messaging, both introduced in Figure 4 below. Also introduced in Figure 4 is an example of the televised commercial that contained industry-devised messaging such as "Take Time to Think". None of the responsible or safer gambling messages advised audiences on the risks associated with gambling, instead encouraging "responsible" gambling behaviours.



A smaller proportion of frequencies across the sample, **8.7% contained information related to the minimum legal age** for gambling in the UK of 18 years old. Age restriction messages were most prevalent in the Leicester City-Tottenham Hotspur (22.5%) and Ipswich Town-Liverpool (15.0%)matches, due to

Figure 4: Examples of
Responsible Gambling
Messaging. Left: A message of
"bet the responsible way" appearing
during West Ham United v Aston
Villa. Right: "Take Time to Think"
is shown at the end of a William
Hill advert during the coverage
of Manchester United v Fulham
(Manchester United v Fulham, Sky
Sports, 16th August 2024; West
Ham United v Aston Villa, Sky
Sports, 17th August 2024).

their prevalence across sponsorship lead-ins and occasional appearances on pitchside hoardings, as demonstrated in Figure 5.

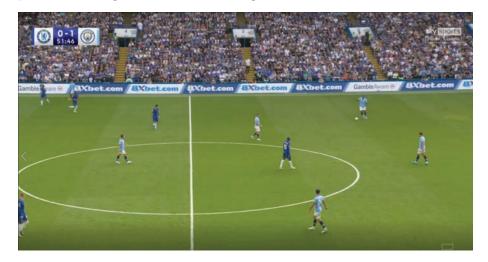


Figure 5: An example of age restriction messaging. Note, that an age restriction message is visible on the pitchside advertising next to a responsible gambling message ("GambleAware") visible during Chelsea v Manchester City (Chelsea v Manchester City, Sky Sports, 18th August 2024).

5.2 SKY SPORTS NEWS

We observed 4,332 gambling references recorded across 1,407 individual frequencies during the 15 hours of Sky Sports News coverage. Results of the analysis are presented in Table 4. Notably, 2,375 references (55%) were shown during match highlights.

Pitchside advertising – both electronic and static – was the most prevalent format, accounting for 54% of all gambling messages. Those featuring on static pitchside hoardings accounted for 31%, while those appearing on electronic pitchside ads (both full and partial) accounted for 23%. This shows the importance of pitchside advertising, ensuring gambling brands have a strong presence throughout broadcast through the sponsorship of teams within both the Premier League and the English Football League (EFL) whose games would have been shown during match highlights. Furthermore, 93% of these references featured only logos. Sky Bet accounted for 31% of all references, reflecting Sky Sports News' coverage of the EFL, the divisions of which are sponsored by Sky Bet (for example, Sky Bet Championship, Sky Bet League One, and Sky Bet League Two).

Notably, only 3.3% of individual frequencies included a harm reduction message, while 6.3% contained an age restriction message. Thus, despite the high volume of advertising, there is a severe lack of responsible gambling messaging. Analysis of the time periods found that most individual frequencies were logged during coverage between 6am and 12pm, and between 5pm and 9pm. The fewest – 2% - individual frequencies were logged between 3pm and 5pm when non-televised Premier League, and most other football matches in England, Scotland, and Wales were being played, with updates being reported as part of the Sky Sports News coverage.

In summary, our analysis highlights the considerable prevalence of gambling ads on Sky Sports News, most notably through pitchside messages shown during match highlights. Given that match highlights included both Premier League and EFL, the findings indicate the prevalence of ads across the entirety of English football, with a lack of responsible gambling and age restriction messages. These findings call for stronger measures to protect viewers from the oversaturation of gambling marketing.

Table 4: Full results from the analysis of Sky Sports News

Sky Sports News		
Variable	TOTAL	
Total number of individual frequencies*	1,407	
Total number of gambling messages**	4,332	
Average duration of gambling messages (seconds)	11.73	
Messages occurring during match highlights (% of messages)	Yes (55%)	
Most common formats (% of messages)	Static pitchside (31%) Electronic pitchside full (21%) Interview/Press Conference (18%)	
Most common brands (% of messages)	Sky Bet (31%) Betway (16%)	
Most common format of gambling referenced (% of messages)	Logo only (93%)	
Specific gamble referenced (% of messages)	Yes (0.1%)	
Generic or indirect reference (% of messages)	Yes (0.0%)	
Harm reduction message (% of individual frequencies)	Yes (3.3%)	
Age restriction message (% of individual frequencies)	Yes (6.3%)	
Times of individual frequencies		
6.00am – 9.00am	340 (24%)	
9.00am – 12.00pm	301 (21%)	
12.00pm – 3.00pm	143 (10%)	
3.00pm – 5.00pm	22 (2%)	
5.00pm – 7.00pm	226 (16%)	
7.00pm – 9.00pm	375 (27%)	

Total messages refer to the maximum number of identical logos visible per frequency.



PITCHSIDE ADVERTISING - BOTH ELECTRONIC AND STATIC - WAS THE MOST PREVALENT FORMAT, ACCOUNTING FOR 54% OF ALL GAMBLING MESSAGES.

5.3 TALKSPORT RADIO

The analysis of TalkSport radio revealed a total of 214 gambling messages recorded during 109 individual frequencies, almost double the number of messages recorded during last year's radio coverage. The findings are introduced in Table 5. Similar to last year's findings, 65.1% of gambling messages appeared during commercial breaks, with Betfair being the most frequently mentioned gambling brand (47.7%). Unsurprisingly given the sports-based focus of the radio station, sports betting was the most frequent type of gambling referenced (80.7%). However, other types of gambling were also promoted to sports fans and listeners such as lotteries and gaming and/or slots. Additionally, most (85.3%) of gambling ads

Additionally, most (85.3%) of gambling ads included harm reduction and age restriction messages.

Nonetheless, these findings demonstrate the prevalence of gambling advertising during one day of TalkSport coverage on the opening Saturday of this season's Premier League, indicating that sports fans engaging with football are inundated with gambling marketing if they listen to matchday coverage via radio. Indeed, our analysis found discussions featuring live odds provided by Betfair, as well as segments of coverage sponsored by operators.

Table 5: Full results from the analysis of TalkSport radio.

Variable	TOTAL
Total number of individual frequencies	109
Total number of gambling messages	214
Average duration of gambling messages (seconds)	25.39
Most common format (% of messages)	Commercial ad break (65.1%)
Most common brand (% of messages)	Betfair (47.7%)
Most common format of gambling referenced (% of messages)	Sports betting (80.7%)
Specific gamble referenced (% of messages)	Yes (15.4%)
Generic or indirect reference (% of messages)	Yes (0%)
Harm reduction message (% of individual frequencies)	Yes (85.3%)
Age restriction message (% of individual frequencies)	Yes (85.3%)
*Individual gambling frequency refers to each	instance of gambling

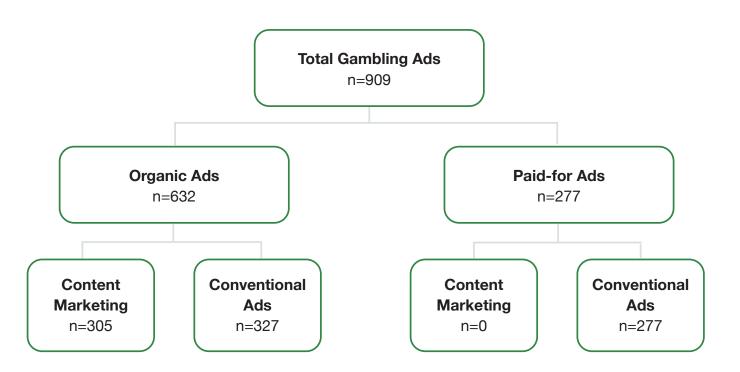
^{*}Individual gambling frequency refers to each instance of gambling marketing logged in the codebook.

^{**}Total messages refers to the maximum number of references heard per frequency.

5.4 SOCIAL MEDIA

We recorded a total of 909 gambling ads posted by the ten examined GB-licensed betting brands between 16th and 19th August. As Figure 6 shows, 277 ads were classified as paid-for ads, disseminated across Instagram and Facebook, while 632 ads were organically posted on X (formerly Twitter). Notably, approximately 48% of the organic ads fell under the category of content marketing. The subsequent flowchart provides an overview of the distribution of ads across different channels and highlights the distinction between content marketing and conventional ads. The following sections will first analyse the organic ads before offering a more detailed examination of the paid-for ads.

Figure 6: Breakdown of sample of posts included in the social media analysis.





5.4.1 Organic Advertising

Organic advertising on social media means that brands do not pay for their ads, but they post them on their own page (ie. they are neither targeted, nor paid-for). Among the 632 organic ads analysed, **305 were identified as content marketing,** while 327 were categorised as conventional ads. Content marketing therefore accounted for approximately 48% of organic ads. Content marketing has recently received increasing criticism due to its high appeal to children and the potential breaches of advertising regulations (Rossi & Nairn, 2024; Luck & Ungoed-Thomas, 2024). Given the distinct characteristics of content marketing in contrast to conventional advertising, we have separated them in Table 6.

Table 6: Results of the content analysis of organic ads, split into content marketing and conventional advertising.

Code	Definition	Content Marketing	Conventional Ads	Total
Volume and Engagement				
Likes	How many likes do the ads have?	250,885 (avg. 822)	2,766 (avg. 8)	253,651 (avg. 401)
Shares	How many shares do the ads have?	21,726 (avg. 71)	1,097 (avg. 3)	22,823 (avg. 36)
Impressions / Views	How many impressions do the ads have?	18,383,059 (avg. 60,272)	5,271,532 (avg. 16,121)	23,654,591 (avg.) 37,428
Content				
Use of emojis	Ads that used use emojis.	158 (52%)	268 (82%)	426 (67%)
Use of humour	Ads that use humorous content.	121 (39%)	17 (5%)	138 (22%)
Reference to the weekend's football	Ads that refer to the weekend's Premier League football.	253 (83%)	189 (58%)	442 (70%)
Signpost to method of gambling	Ads that make reference to how to the audience could participate in the gamble (e.g. having a link to the website)?	0	150 (46%)	150 (24%)
Odds	Ads that present odds for a specific bet.	0	115 (35%)	115 (18%)
Bonus or inducement	Ads that include a bonus or inducement (e.g. sign-on, deposit match, etc.).	0	90 (28%)	90 (14%)
Social Responsibility & A	dherence to Advertising Regulations			
Age restriction	Ads that make reference to the age estricted nature of gambling.	46 (15%)	245 (75%)	291 (46%)
Harm reduction messaging	Ads that include a harm reduction message.	47 (16%)	250 (76%)	297 (47%)
T&Cs stated	Ads that include information on the T&Cs.	6 (2%)	109 (34%)	115 (18%)
Strong appeal to children	Ads that were judged to be of strong appeal to children.	38 (13%)	5 (2%)	43 (7%)
Not obviously dentifiable as advertising	Ads that are not obviously identifiable as advertising.	225 (74%)	0	225 (36%)
Posted during match	Ads posted during "whistle-to-whistle" ban.	170 (56%)	69 (21%)	239 (38%)

Volume and Engagement

Whilst the entire Premier League weekend attracted approximately nine million TV viewers across six matches (Premier League, 2024b), the social media ads by the selected ten brands generated around 24 million views within the same weekend, suggesting a considerably greater reach than traditional broadcast advertising. Beyond this, we found a high level of engagement between users and advertising, with 22,823 shares and 253,651 likes. Notably, these figures were significantly higher for content marketing compared to conventional ads, with 77% of all views, 95% of all shares, and 99% of all likes - highlighting the efficacy of content marketing compared to conventional ads. One of the most successful ads in the organic sample was posted by Paddy Power, garnering approximately 750,000 views, (2,400 shares, and 21,000 likes) shown in Figure 7. This ad included a picture of Jamie Vardy (a Leicester City player) alongside a humorous narrative on the subject of his career, and an amusing criticism aimed at Tottenham Hotspur. Notably, we judged this ad to be strongly appealing to children (and therefore in breach of regulations), in line with ASA guidance on the appeal of active sportspeople to children (ASA, 2023). The ad has been reported to the ASA for investigation.



Figure 7: Highly successful ads that seem to breach regulations. Left: Social media ad by Paddy Power that received over 750,000 views, 2,400 shares, and 92 comments, making it one of the most success ads. Right: Ad by Betfred with was viewed over 100,000 times. Both ads were categorised as content marketing; not clearly identifiable as advertising; and of strong appeal to children due to the use of active UK sports people.

Content

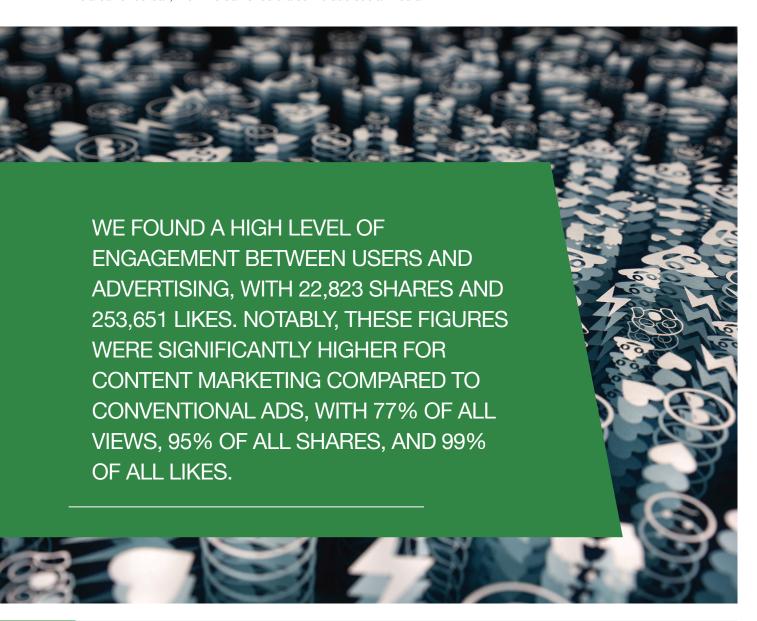
Given the premise that organic ads rely on user engagement (as seen in the high engagement metrics), they were found to use techniques such as humour (22%), emojis (67%), and references to the ongoing Premier League opening weekend football matches (70%). Content marketing was found to use humour (39%) and references to the weekend's Premier League matches (83%) markedly more often compared to conventional ads. Whilst none of the content marketing ads contained any references to gambling, just under half (46%) of the conventional ads included a signpost to access a bet, 35% included odds, and 28% offered bonuses or other financial inducements (such as free bets).

Social Responsibility and Adherence to Advertising Regulations

In our organic sample, 46% of ads included age restrictions and 47% included harm reduction messages. When focusing on content marketing, this reduced to only 15% and 16% respectively. We also found that 13% of content marketing and 2% of conventional ads were likely to be of strong appeal to children – and therefore in breach of CAP Code 16.3.12. The main reason for those breaches, was that many ads included active, top sportspeople, something the ASA has argued to be of high appeal to children (ASA, 2023).

Advertising regulations in the UK stipulate that "Marketing communications must be obviously identifiable as such." (CAP Code 2.1). In our research, however, 225 (74%) of content marketing ads were classified as not obviously identifiable as marketing communication. These ads omitted any indication that the post was indeed advertising. They did not include an age warning, harm reduction messages or any link to gambling (for example, odds, or a link to a website). The only way that users can understand the commercial intent behind the ad is by knowing the brand. We recently pointed out to ASA that it would be unreasonable to expect that children know all 2,700 UK licensed gambling brands that might operate on social media. In a recent letter, the ASA acknowledged our concerns. Indeed, in our previous research we found, by conducting an online experiment with over 650 participants, that neither children nor adults can identify those ads clearly as advertising (Rossi & Nairn, 2024). Subsequently, we argue that 225 analysed ads are in breach of CAP regulations. We have passed on 100 ads that seem to breach regulations to the ASA for investigation (see Figure 7 for examples).

Finally, we found that 238 (38%) of all organic ads, were posted during the so-called "whistle-to-whistle" ban. Whilst this ban so far only includes TV commercials, our study shows how ineffective this ban is, as social media ads reap substantially more views compared to the live broadcasts. If the Industry Group for Responsible Gambling Codes (IGRG) is serious about reducing the prevalence of marketing related to football, then the ban should also include social media.



5.4.2 Paid-for Advertising

The results of our analysis of paid-for ads are detailed in Table 7. Since the UK is not part of the European Markets Act (see Meta, 2023) because it left the EU in 2020, we were unable to access data on targeting or reach via the Meta Ad Library. However, based on campaigns these brands run in Ireland and the Netherlands (where such data is available), the evidence suggests that the 277 ads might have been seen by millions of British users. The content analysis of paid gambling ads on social media has revealed several concerns.

Table 7: Results from the analysis of paid-for ads.

Code	Definition	Total		
Content				
Use of emojis	Ads that used use emojis.	264 (95.3%)		
Use of humour	Ads that use humorous content	12 (4.3%)		
Reference to popular culture.	Ads that have reference to popular culture.	0		
Reference to football weekend	Ads that refer to the weekend's Premier League football.	86 (31.0%)		
Signpost to method of gambling	Ads that make reference to how to the audience could participate in the gamble (e.g. having a link to the website).	240 (86.6%)		
Bonus or inducement	Ads that offer bonus or monetary inducement (sign on bonus, free bets etc.).	228 (83.3%)		
Odds	Ads that presents odds for a specific bet.	13 (4.7%)		
Social Responsibility & Adherence to Advertising Regulations				
Age restriction	Ads that make reference to the age restricted nature of gambling.	255 (92.7%)		
Harm reduction messaging	Ads that include a harm reduction message.	260 (93.9%)		
T&Cs stated	Ads that include informationon the T&Cs.	248 (85.5%)		
Clearly identifiable as advertising.	Ads that are clearly identifiable as advertising.	277 (100%)		
Strong appeal to children	Ads that were judged to be of strong appeal to children.	7 (3%)		

Firstly, techniques such as emojis were featured in 95% of the paid ads, indicating a focus on visual appeal and emotional engagement. In stark contrast to organic ads, only 4% of paid ads used humour, and none referenced popular culture, such as memes or TV series. Additionally, 31% of the ads made direct references to the weekend's Premier League football, often by mentioning specific matches, displaying odds or offering specific deals related to the event.

The prevalence of references to gambling methods and direct links was notably higher in the paid ads (86.6%). Furthermore, 83.3% of paid ads offered bonuses or monetary incentives, such as sign-up bonuses or free bets. By consistently directing users towards gambling opportunities, paired with financial inducements, these ads play a crucial role in facilitating direct access to betting platforms. This ease of access could potentially exacerbate impulsive betting behaviours, particularly among vulnerable individuals, leading to unforeseen consequences. Notably, since these are paid ads, users are targeted and ads may be exposed to them involuntarily, even if they do not follow any gambling-related accounts on social media.

With respect to social responsibility and advertising regulations, we found that almost all paid ads included age restrictions (92.7%), harm reduction messages (93.9%), and terms and conditions (85.5%). This represents a substantial increase compared to last year, when approximately 35% of ads lacked such measures. Finally, unlike organic advertising, all paid ads were clearly identifiable as advertising.

6 DISCUSSION

This project has, for the second consecutive year, explored the prevalence of gambling marketing across televised matches, sports news programming, radio and social media during the opening weekend of this season's Premier League. The total of **29,145 gambling messages** across all media represents an increase of 165% compared to last season's total. This increase is due to a proliferation of marketing across **televised matches**, **Sky Sports News**, **and TalkSport radio** compared to last season. Indeed, as highlighted in Table 8, there were over three times more gambling messages during the opening weekend's matches compared to last season – 23,690 in 2024, compared to 6,966 in 2023. Meanwhile, gambling messages on Sky Sports News had more than doubled in 2024 compared to 2023, while messages found on TalkSport radio increased by 82%. Our findings highlight three areas for discussion: the increase of gambling ads compared to last year; the possible normalisation of gambling in football; and the inefficacy of self-regulation and voluntary measures.

Table 8: A comparison of gambling ads during the opening weekend of the Premier League in 2023 and 2024.

FORMAT	2023	2024	Increase/Decrease
Match Broadcast	6,966	23,690	240%
Sky Sports News	2,014	4,332	115%
TalkSport Radio	117	214	82%
Social Media	1,902	909*	-52%
TOTAL	10,999	29,145	165%

^{*} Due to changes in the Meta Ad Library, we had to use different way of collecting this data. Accordingly, the number of social media ads this year is reported to be lower, which does not necessarily indicate an actual reduction in paid-for ads.

A vast increase in gambling marketing from 2023/2024 to 2024/2025

As outlined earlier, the methodology was the same as last season's study with some minor adjustments to the codebooks that meant we were not collecting unnecessary data. Yet, our findings highlight a vast increase in gambling messaging, increasing overall from 10,999 in 2023, to 29,145 in 2024. This vast increase largely came from gambling marketing during the match broadcasts, which increased from 6,966 messages in 2023, to 23,690 in 2024. The analysis of live television coverage found a large increase in messages appearing during sponsorship lead-ins, rising from 1,662 in 2023 to 10,112 in 2024. A considerable amount of exposure to gambling marketing was also attributed to pitchside marketing. We saw a growth in the messages disseminated across electronic pitchside advertising hoardings, from 3,877 in 2023, to 5,953 in 2024. This included, in particular, the match between Ipswich Town and Liverpool where 44.0% of messages occurred on pitchside electronic hoardings. Additionally, static pitchside-based messages were ever-present during the West Ham v Aston Villa match, accounting for 51.6% of the messages occurring during the match itself.

While the sheer volume of messages conveyed during the Bet365 sponsorship lead-in segment

would have been the same for any team that was broadcast during the opening weekend, the growth in pitchside advertising reflects the selection of matches featuring clubs who are reliant on gambling operators' sponsorship. This may reflect the added pressures experienced by Premier League clubs to generate sponsorship income to remain competitive, although this was outside the scope of our study. On the other hand, as a growing body of literature indicates, increased exposure to gambling-related marketing can influence gambling behaviour (McGrane et al., 2023; Hing et al., 2024). The possible harms that could emerge from marketing – and in particular, sponsorship - have been acknowledged by the Premier League through its forthcoming removal of front-of-shirt logos, and a voluntary code of conduct. Our results indicate that these measures are vastly ineffective. It could be argued that an increase of shirt-based messages was expected this year, given the increase in the number of teams that have principal, shirt-based sponsorship agreements with gambling operators from eight in the 2023-2024 season, to eleven in 2024 -2025 (Gamp, 2024). Indeed, Premier League clubs will collectively generate over £500 million in shirt-based. gambling-related sponsorship this season (Gamp, 2024). We also anticipated an increase in shirt-based references this year given the increase in matches during the opening weekend featuring teams with shirt-

based sponsorship, which increased from four in last season's study compared to six during this season's study. While the number of shirt-based messages increased, from 632 in 2023 to 2,069 (totalling front and sleeves of shirts) in 2024, the proportion of televisionbased messages that featured on players' shirts actually decreased from 9.1% in 2023, to 8.8% in 2024. While this represents a growth in shirt-based sponsorship year-on-year, shirt-based sponsorship - even with an increase in televised coverage of teams containing shirt-based sponsorship - is still less prominent than other forms of advertising, such as sponsorship lead-ins and pitchside advertising. This is further evidenced by the number of messages experienced during the match between Ipswich Town and Liverpool FC, neither of which contained a shirt-based sponsor and contained more references than two matches that featured teams with gambling sponsors on their shirts (Manchester United v. Fulham and Brentford v Crystal Palace).

Messages exposed during the Sky Sports News coverage increased from 2,014 in 2023 to 4,332 in 2024. Out of the 4,332 messages, just over half appeared during match highlights. The proportion of pitchside messaging – both static and electronic – has reduced compared to last year (77.8% in 2023 to 52% in 2024), although the proportion of static pitchside alone remains similar (37% in 2023 to 31% in 2024). This nonetheless represents an increase from 745

static pitchside messages in 2023 to 1,342 in 2024. Electronic pitchside-based messages found a much smaller increase from 882 in 2023, to 909 in 2024. The proportion of messages attributed to Sky Bet also increased from 8.5% in 2023 to 31% in 2024, also highlighting an increase in volume. The increased volume of Sky Bet-related messaging, in addition to the growth of static pitchside messages, suggests that the growth in the messages during the Sky Sports News coverage can be attributed to coverage of the EFL, which itself is sponsored by Sky Bet.

Meanwhile, the growth in radio-based messages can be attributed to an increased number of messages found during commercial ad breaks, rising from 88 in 2023 to 139 in 2024. This increase accounts for over half of the overall increase in radio-based messages. The coders reported anecdotally that commercial ads were also built into – or easily flowed into from – studio discussions.

In summary, while there was a decrease in social media-based marketing, the increases in messages occurring during the live matches, Sky Sports News, and TalkSport radio all contributed to an overall growth in messages encountered during the opening weekend of the Premier League season.



The potential normalisation of gambling in football

This substantial increase in marketing found during this year's opening weekend compared to 2023 raises concerns for the normalisation of gambling in football, particularly among children. Previous research has found that gambling marketing normalises gambling among sports fans (McGee, 2020; Jones et al., 2020; Nyemcsok et al., 2021). This relates not only to the direct influence of gambling-related marketing on gambling behaviour (McGrane et al., 2023; Hing et al., 2024), but also the perception that gambling is a normal, harmless part of football (see Deans et al., 2017; Nyemcsok et al., 2021).

With this existing research in mind, our findings demonstrate the potential risk of portraying gambling as a normal part of football among fans, particularly given the prevalence of marketing across multiple platforms. For example, gambling messages on Sky Sports News occurred predominantly during match highlights, and 80.73% of radio messages were references to football betting. The obvious links between football and gambling broadcast across media that is also intended for other sports risks reinforcing the perception of gambling as a harmless activity among football fans, which is of particular concern given that they will include children, and possibly audiences who are vulnerable. Further evidence is also shown by the strategies used by operators on social media. Indeed, 70% of organic ads were directly related to the weekend's Premier League action. While some of these ads were conventional ads, most were content ads deployed by operators to engage audiences with entertaining content other than gambling. This is a further strategy deployed by operators to place themselves within normal football consumption routines, with insufficient awareness of the risk of harms.

The gambling industry spends £1.5 billion on marketing their brands (Regulus Partners, 2018), including an increasing amount via professional football (Gamp, 2024). As a result, the gambling sector has successfully embedded itself as an integral part of football consumption. Indeed, previous research has found that gambling is perceived as a normalised feature of football fandom where some football fans cannot watch a match without thinking they should place a bet (McGee, 2020). Within sports more generally, Nyemcsok et al. (2021) explored the perceptions of gambling among young people in Australia and found that there was a belief that it is a normal activity in which everyone engages in, particularly among sports fans. Many scholars argue that this social acceptance of gambling as a normalised

activity in sport is due to the vast amount of gambling marketing (Lopez-Gonzalez et al., 2017; Nyemcsok et al., 2021). Jones et al. (2020) argue that the promotion of gambling in football means that football contributes to the overall amount of gambling – and gambling harm - that occurs in society.

Relatedly, for the second consecutive year, our findings highlight a lack of age restriction and harm reduction messaging which may further risk the possible normalisation of gambling into football, or the perception that gambling is a normal part of football consumption. Additionally, the harm reduction messaging that was uncovered was mainly focused on encouraging "safer gambling" behaviours, a form of messaging that has no effect on gambling behaviour (Newall et al., 2022), and is primarily intended to protect industry interests (Van Schalkwyk et al., 2021). Indeed, the perception that gambling can be a normal, social activity consumed as part of football may fail to reduce harms that can be experienced by all stakeholders (Wheaton & Ford, 2024).

The growing failure of self-regulation

In line with our findings from last year, we found several issues with the current self-regulations governing sports-related gambling marketing in the UK. These regulations have proven largely ineffective in reducing the volume or enhancing the social responsibility aspects of such marketing. Many of these issues seem to arise from the approach taken by the UK, where gambling marketing is largely self-regulated. Unlike most other European jurisdictions, such as Germany, Belgium, the Netherlands, Spain, and Italy, where legislation is in place, the UK's approach allows the gambling and football industries to self-regulate through the Industry Group for Responsible Gambling Codes (IGRG, 2020), the Sponsorship Code of Conduct formed by the Premier League (2024a) and other football-related bodies, and codes by the Committee of Advertising Practice (CAP).

While proponents of self-regulation argue that it allows for a more flexible and industry-tailored approach, this model has been widely criticised for enabling the industry to prioritise its own interests over consumer protection and public health.

Research has highlighted that self-regulatory policies often result in codes which are tokenistic and are accompanied by enforcement issues with minimal or no penalties for breaches which can in turn undermine the effectiveness of marketing restrictions aimed at protecting vulnerable groups, such as children and those who experience gambling-related problems (Selin, 2015). In the following section we consider our findings in

relation to each of the current self-regulatory policies.

Front-of-shirt ban

Premier League (2023) clubs agreed last year to voluntarily remove front-of-shirt gambling sponsors at the end of the 2025/2026 season. While this policy was generally welcomed, it has also faced criticism for not going far enough. It fails to address the presence of gambling logos around stadiums and still permits advertising on other parts of the kit, such as sleeves or shorts. Our findings align with previous research, contributing to the growing evidence of the inefficacy of the front-of-shirt ban (Rossi et al., 2023; Torrance et al., 2023). Last year, front-of-shirt sponsorship accounted for 9.1% of all gambling messages; this year, the proportion decreased to 8.3%, although this signified an increase in actual front of shirt-based messages overall.

The highest numbers of gambling messages were found through sponsorship lead-ins and pitchside messages, neither of which are affected by the ban. This was evident across two matches, Chelsea v Manchester City (1,805 gambling references) and Ipswich Town v Liverpool (4,464 references), of which the total number of gambling references exceeded those found across all six matches in 2023, even though none of these teams had a front-of-shirt gambling sponsor.

Even without front-of-shirt gambling messages, over 21,000 gambling messages were recorded during the six games, highlighting the limited impact of this regulation. The voluntary removal of front-of-shirt sponsorship does not significantly reduce exposure to gambling marketing, as clubs can still display sponsors on other parts of the kits and in high-visibility areas such as pitchside hoardings.

The "Whistle-to-Whistle" Ban

The second piece of self regulation that is aimed at reducing the volume of gambling marketing during football is the "whistle-to-whistle" ban, introduced by the IGRG (2020). This ban aims to reduce gambling harm to children and vulnerable groups by preventing gambling adverts from being televised five minutes before and after matches broadcast before the 9pm watershed. However, contrary to how the industry has promoted this regulation to the public and policymakers, evidence suggests that the "whistle-to-whistle" ban has little effect, as it only restricts TV commercials during this period. Other - and arguably more persuasive forms of marketing - such as hoardings, shirt sponsorships, radio, or social media advertising, are excluded, rendering the regulation largely

ineffective (Rossi et al., 2023; McGrane et al., 2024; Sharman et al., 2024).

Last year, we recorded over 7,000 gambling messages during the "whistle-to-whistle" ban. This year, this number increased to over 10,000 gambling messages recorded during the so-called ban period (9,368 during the six live broadcasts, 391 on Sky Sports News, and 269 ads on social media). This means that over one-third of all 29,145 gambling marketing messages observed in our analysis occurred during the "whistle-to-whistle" ban. Similar to the voluntary front-of-shirt ban, our findings demonstrate that the voluntary removal of gambling-related marketing during the "whistle-to-whistle" period is largely ineffective in actually reducing the volume of gambling marketing.

The Sponsorship Code of Conduct High Volume of Gambling Marketing

As a reminder, the new Code of Conduct requires that "the design of gambling sponsorship as part of Gambling Related Agreements limits its reach and promotion to children, and those at risk of gambling related harm" (Premier League, 2024a, p.2). In summary, the code mainly aims to protect vulnerable groups by limiting the reach and promotion of gambling messages. However, compared to last year where the policy was not in place, we observed a 165% increase in gambling messages, rising from 10,999 messages to 29,145. The majority of marketing occurring during live matches was displayed on sponsorship lead-ins and pitchside hoardings, a prominent form of advertisement visible to both children and adults. This increase suggests that the new self-regulatory measure has failed to address the pervasive nature of gambling marketing in football, particularly in areas easily accessible to all viewers, including minors. The presence of such a large number of messages in easily visible areas, such as pitchside hoardings, undermines the principle of "protection" that the code claims to uphold. Instead of reducing exposure, the high volume of messages suggests that the code is not effective.

A Failure in Promoting Responsible Gambling Messaging

The principle of social responsibility within the new code stipulates that a "reasonable and proportionate portion" (Premier League, 2024a, p. 4) of gambling marketing should contain responsible gambling messaging. Whilst the wording in this code is rather vague, we found that only 18.4% – just under one-fifth – of gambling messages during the six live broadcasts were accompanied by any form of harm reduction messaging. However, for some matches (e.g. Manchester United v Fulham, or West Ham v Aston

Villa) the share was even lower than last year with 8.1% and 13.2% respectively. The fact that 82% of gambling messages were not accompanied by any responsible gambling messaging shows a critical gap in compliance, and is clearly below that which is promised by the gambling industry, who announced that at least 20% of ads will promote responsible gambling messaging (IGRG, 2020). Additionally, the responsible gambling messages seem to be inadequate or misleading. For example, messages like "bet the responsible way" during Betway sponsorships or small-print disclaimers in Bet365 lead-in advertisements lack the clarity and prominence needed to have any meaningful impact. Indeed, as mentioned earlier, messages such as "Take Time to Think", and "When the fun stops, stop" have been found to protect industry interests (van Schalkwyk et al., 2021), whilst being ineffective at changing gambling behaviour (Newall et al., 2022).

Overall, the new sponsorship Code of Conduct appears largely ineffective in achieving the intended two goals we investigated. The Code failed to curb the volume of gambling messages visible during matches, whilst responsible gambling messages are insufficiently present. To be truly socially responsible in line with this principle set out in the sponsorship Code of Conduct, the Code should set a clear limit for the maximum number of gambling marketing permitted during football events, as well as outlining much clearer guidance on safer gambling messaging - including its wording that should be focused on the related harms to be effective (e.g. "Chances are you lose", or "Gambling is addictive"). Currently, the code is too vague, which seems to make it impossible to follow, or to enforce.

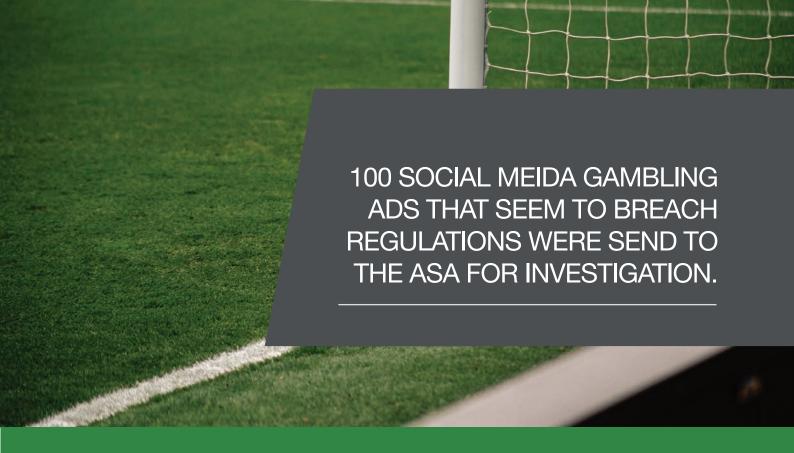
7 | CONCLUSION AND POLICY RECOMMENDATIONS

We set out to track the prevalence of gambling marketing across multiple platforms during the opening weekend of the 2024/2025 Premier League season. To achieve this, we analysed gambling marketing across platforms that football supporters commonly engage with to consume football, specifically: live match broadcasts, Sky Sports News, TalkSport radio and social media. We also compared our findings to those from the study conducted during the opening weekend of the 2023/2024 season. Our findings indicate the extent to which football supporters are inundated with gambling marketing across multiple platforms has increased between 2023 and 2024.

With a stark increase in gambling marketing from 10,999 in 2023, to 29,145 in 2024, the relationship between professional football in England and the gambling industry has become even more interdependent. While the number of voluntary measures intended to protect football fans has increased, so has the number of gambling messages. Thus, the 2024-2025 Premier League season has even more self-regulation and even more gambling marketing, compared to the previous year. Indeed, the amount of gambling messaging via match broadcasts more than tripled.

Voluntary measures such as the front-of-shirt sponsorship ban, the "whistle-to-whistle" ban, and the sponsorship Code of Conduct are an acknowledgement from the Premier League and gambling industry that there is a risk of harm from gambling marketing. However, these measures are largely tokenistic and do not adequately protect football supporters from exposure to gambling marketing. It is increasingly clear, that these self-regulation measures, introduced by the industry as an attempt to avoid more stringent, legislative intervention, are completely failing.

The gambling industry has had several years to develop codes that protect people from gambling harms. Instead, evidence suggests that it has focused on creating policies that appear credible when promoted via large media campaigns, but ultimately serve to protect the industry's self-interest. Given the inadequacy of these self-regulatory approaches, we urge the government to follow the example set by many other countries and introduce robust legislation to regulate gambling marketing in football more effectively. In light of the compelling evidence presented in this study highlighting the failure of self-regulation, we propose one key recommendation:



Introduce Legislation on Gambling Marketing

The evidence is overwhelming: the gambling industry is not capable of effectively regulating its own marketing practices. Neither the "whistle-to-whistle" ban, the front-of-shirt sponsorship ban, nor the sponsorship Code of Conduct have been shown to have any meaningful impact on reducing the volume of gambling marketing associated with sports consumption. Similarly, the regulations set by the Committee of Advertising Practice have repeatedly failed to address compelling evidence regarding gambling adverts that use techniques highly appealing to children (e.g., content marketing).

The persistent failure to implement self-regulations that genuinely protect consumers leads to the conclusion that the industry is incapable of doing so. Accordingly, we believe that the government must intervene by introducing comprehensive gambling marketing legislation, following the example of many other European countries. Such legislation should include the following:



A Comprehensive "Whistle-to-Whistle" Ban

The intention of a "whistle-towhistle" ban is to prevent high exposure to gambling marketing for sports fans. To be effective, this legislation must cover all forms of gambling marketing. This includes all marketing that occurs during sporting events whether through commercials, or as part of sponsorship agreements between operators and football clubs or competitions. A staggered approach has been followed in the Netherlands, thus allowing clubs and competitions time to pursue new sponsorship arrangements. The ban should also cover any marketing on platforms that accompanies live events (e.g., social media, radio broadcasts).



Centralised Mandate for Responsible Gambling Messaging

While responsible gambling messaging is important, the messaging currently implemented by the industry is scarce, and has been proven to be ineffective at preventing harmful gambling behaviours. Legislation should mandate that all gambling marketing include responsible gambling messages that focus on the potential harms of gambling (e.g., "Chances are you lose" or "Gambling is addictive"). The law should also specify the size, prominence, and duration of these messages to ensure they are clearly visible.



Ban on Gambling Content Marketing

Social media advertising has become increasingly effective in reaching vast numbers of sports fans. However, the use of content marketing has repeatedly breached key advertising regulations, particularly in making content appealing to children and failing to distinguish it clearly as advertising. Therefore, based on existing evidence, we recommend a complete ban on gambling content marketing.

THE TOTAL OF 29,145 GAMBLING MESSAGES ACROSS ALL MEDIA REPRESENTS AN INCREASE OF 165% COMPARED TO LAST SEASON'S TOTAL.

8 ABOUT THE AUTHORS

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Dr Raffaello Rossi is Lecturer in Marketing at the University of Bristol. He has worked extensively on the effects of gambling advertising on young people, resulting in national and international media coverage, discussion of the research in UK Parliament, and has contributed to several changes in the regulation of gambling advertising. Raffaello has received funding from ESRC, CBC News, GambleAware, UK Gambling Commission and Action Against Gambling Harms.

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Dr Jamie Wheaton is a Senior Research Associate at the University of Bristol, specialising in the relationship between sports and other industries (for example, gambling). Specifically, he explores how industries – such as the gambling sector - use sports as a platform to advertise their brands through a range of marketing strategies. His work on the prevalence of gambling adverts in sport has sparked discussions in UK Parliament, as well as widespread coverage in national and international news outlets. Jamie has received funding from GambleAware, ESRC, the British Academy, and the Canadian Broadcasting Corporation. He is affiliated with the Bristol Hub for Gambling Harms Research.

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Edoardo Tozzi is a postgraduate researcher at the University of Bristol. His research focuses on conducting a psychophysiological study regarding the impact of (e)sports gambling advertising on social media platforms among the youth demographic. His specific area of investigation involves analysing content and influencer marketing strategies. Edoardo has not received any external funding.

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