



# Review of Voluntary Whistle-to-Whistle Advertising Restrictions

## SUMMARY

- Gambling industry's voluntary commitment to bar "whistle-to-whistle"<sup>1</sup> advertising during live sport now restricts pre-watershed (9pm) advertising to live sport programmes only (outside of W2W period)
- New commitment sees gambling advertising<sup>2</sup> on TV virtually eliminated<sup>3</sup> during the restricted period, according to independent data
- As a proportion of total TV gambling advertising consumption, the W2W period fell from 10.5% to just 0.6%, resulting in 109 million fewer advertising views over comparative weekends<sup>4</sup>
- Total gambling advertising exposure over the full duration of live sport pre-watershed programmes<sup>5</sup> also declined by 78%, resulting in 103 million fewer advertising views between comparative weekends
- Gambling advertising views by children (aged 4-17) reduced by 70% over the full duration of live sporting programmes, and has been effectively eliminated<sup>6</sup> from the restricted W2W period
- Sports-gambling advertising hourly output around sports-programmes<sup>7</sup> reduced by 54% with a 10% decline for other gambling formats
- Introduction of the W2W restriction contributed to a reduction of 1.7 billion views of gambling advertising over the five months<sup>8</sup> to end December 2019
- No apparent displacement of gambling advertising to evening sports programming, with post-watershed sports-gambling advertising also down by 28%. However, the viewing of sports gambling advertising around non-sports programming after the watershed rose by around one-third, which may reflect some displacement following the W2W restriction



### GAMBLING ADVERTISING VIEWS BY CHILDREN (AGED 4-17)

## REDUCED BY 70%

over the full duration of live sporting programmes, and has been effectively eliminated from the restricted W2W period

Introduction of the W2W restriction contributed to a

## REDUCTION OF 1.7 BILLION VIEWS

of gambling advertising over the five months to end of December 2019

<sup>1</sup> Defined as five minutes before game commences to five minutes after it ends

<sup>2</sup> Advertising, advertising views, advertising exposure or consumption means individual views or Commercial Impacts (CI), equating to one person seeing one advert. Gambling advertising comprises sports gambling, lotteries, bingo, online casino, poker and scratch cards. Sports gambling excludes lotteries, bingo, online casino, poker and scratch cards

<sup>3</sup> Advertising views down 96% between comparative periods, exceptions may be due to broadcaster error in applying new rules

<sup>4</sup> Comparative periods comprise four weekends in September 2018 versus the same weekends in September 2019, having defined the weekend period as being 17.00 on Friday to 6am on Mondays

<sup>5</sup> Includes entirety of pre-watershed live sporting programmes as defined by the broadcasters from build-up to post-match analysis, including banned period of five minutes before game commences to five minutes after it ends

<sup>6</sup> Views by children down by 97% over comparative periods, exceptions may be due to broadcaster error in applying new rules

<sup>7</sup> Number of hours of gambling advertising around all sports-programmes

<sup>8</sup> From implementation of W2W ban on August 1st 2019 to end December 2019

## INTRODUCTION

In December 2018, a number of leading UK gambling operators<sup>9</sup> voluntarily agreed to abolish all product advertising for the duration of live sporting events. This was defined as five minutes before a game begins until five minutes after it ends (the “whistle-to-whistle” period).

Following this agreement, in January 2019 the gambling industry formally adopted the new provision into its industry **Code** which form part of the Licence Conditions as set down by the Gambling Commission which means it applies to all UK licensees. The so-called “whistle-to-whistle” (W2W) restriction came into effect on August 1st 2019 in time for the new English football season and applies to all sporting events that start prior to the 9 pm watershed, with the exception of both horse racing and greyhound racing.<sup>10</sup>

The Remote Gambling Association (now the Betting and Gaming Council (BGC)) commissioned Enders Analysis<sup>11</sup> to provide independent data on gambling advertising on TV around sports-programmes. This report looks solely at the W2W ban’s impact on TV advertising and conclusions and commentary are the BGC’s.

<sup>9</sup> GVC Holdings plc, Flutter plc, William Hill plc, Bet365, Sky Betting and Gaming

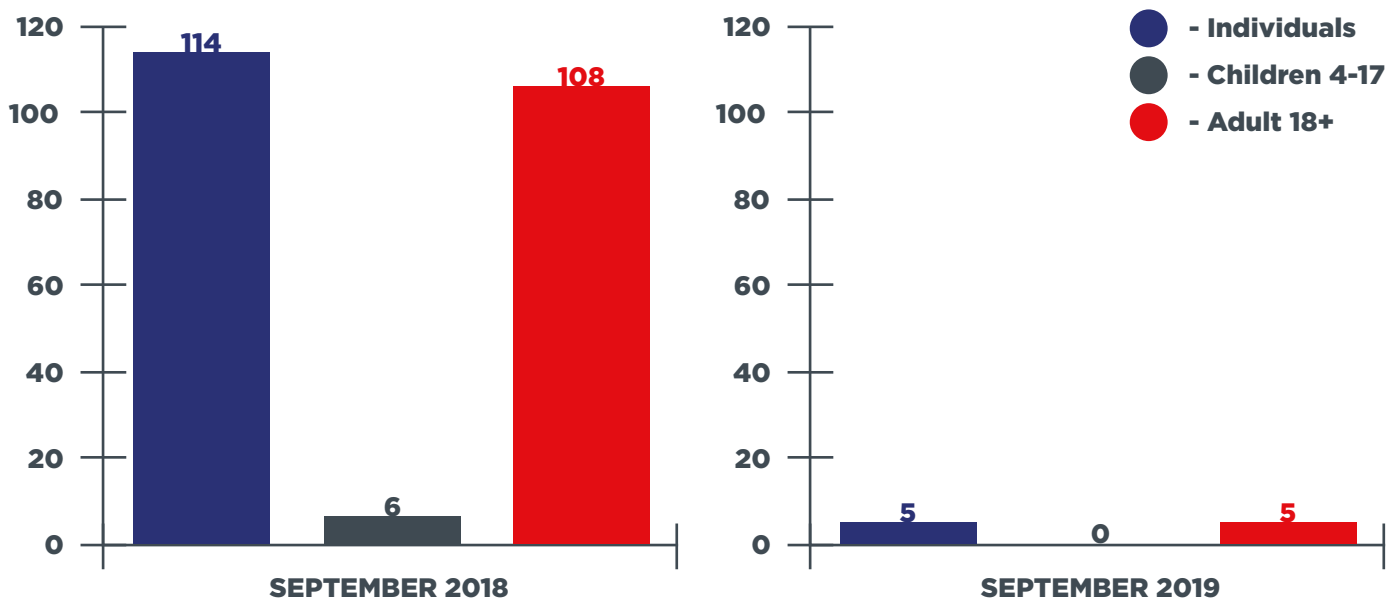
<sup>10</sup> Changes to the IGRG Code also saw operators restricted to advertising around ‘live’ sport rather than ‘televised’ sport from [January/August 2019]

<sup>11</sup> Enders Analysis is a research and advisory firm specialising in media, entertainment, mobile and fixed telecoms, with a special focus on new technologies and media, covering all sides of the market, from consumers and leading companies to regulation.

## ANALYSIS

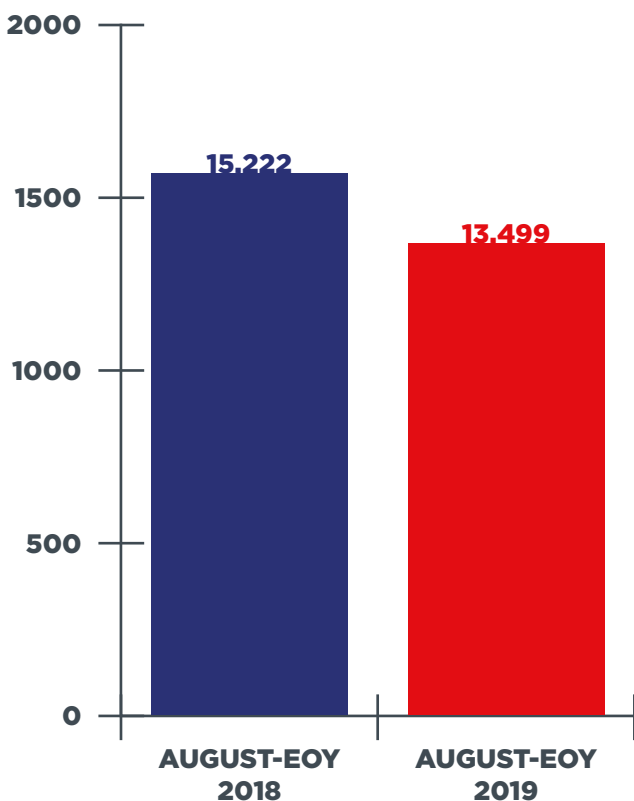
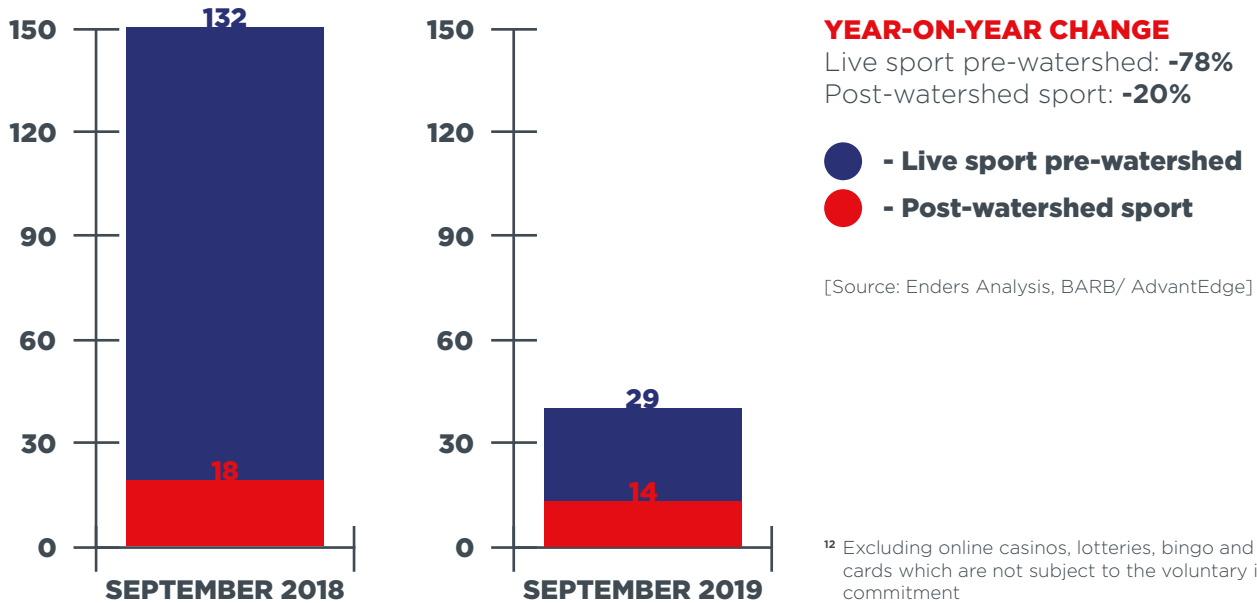
The impact of the W2W ban has been to virtually eliminate sports-gambling advertising on TV during the restricted period, with advertising views down by 96% between comparative weekends. As a proportion of total gambling advertising consumption, the W2W period fell from 10.5% of total gambling views to just 0.6%, contributing to the removal of some 109 million advertising views between the W2W periods analysed.

### CONSUMPTION OF GAMBLING ADVERTS DURING THE WHISTLE-TO-WHISTLE PERIOD (COMMERCIAL IMPACTS, MILLIONS)



The W2W restriction has resulted in minimal displacement of gambling advertising into other parts of live sport TV programming. The analysis shows that total gambling advertising over the full duration of live pre-watershed sports-programming on TV declined by 78% over the comparative periods, resulting in 103 million fewer advertising views. Neither does the W2W restriction appear to have displaced advertising to sports-programmes starting after the 9 pm watershed, with post-watershed sports-gambling advertising declining by 20%.

**CONSUMPTION OF GAMBLING ADVERTS BY THE TYPE OF PROGRAMME THEY WERE BROADCAST DURING, INDIVIDUALS 4+ (COMMERCIAL IMPACTS, MILLIONS)**



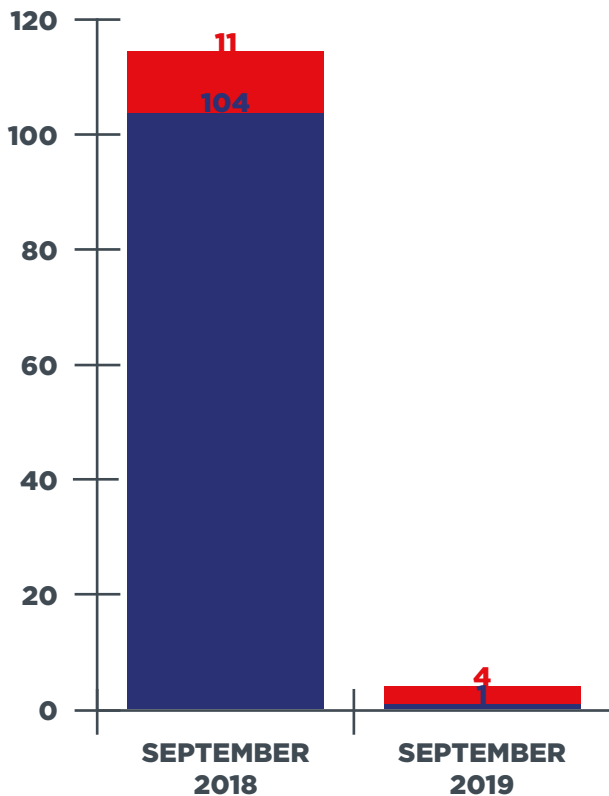
The introduction of the W2W restriction contributed to a reduction of over 1.7 billion views of gambling advertising from its introduction on August 1st 2019 to the end of December 2019 compared with the same period the previous year.

**TOTAL NUMBER OF COMMERCIAL IMPACTS AROUND GAMBLING ADVERTISING FROM AUGUST UNTIL END-OF-YEAR FOR 2018 AND 2019**  
**Viewing of all gambling advertising across all channels, individuals 4+ (commercial impacts, millions)**

[Source: Enders Analysis, BARB/ AdvantEdge]

<sup>13</sup> Volume defined here as number of adverts

## COMMERCIAL IMPACTS OF GAMBLING ADVERTS BROADCAST DURING THE WHISTLE-TO-WHISTLE PERIOD BY GAMBLING CATEGORY (MILLIONS)



Consumption of gambling advertising on TV by children (aged 4-17) has been effectively eliminated during the restricted W2W period, falling by 97%. Children's exposure to gambling advertising over the full duration of live sports-programmes also saw a substantial decrease of 70%.

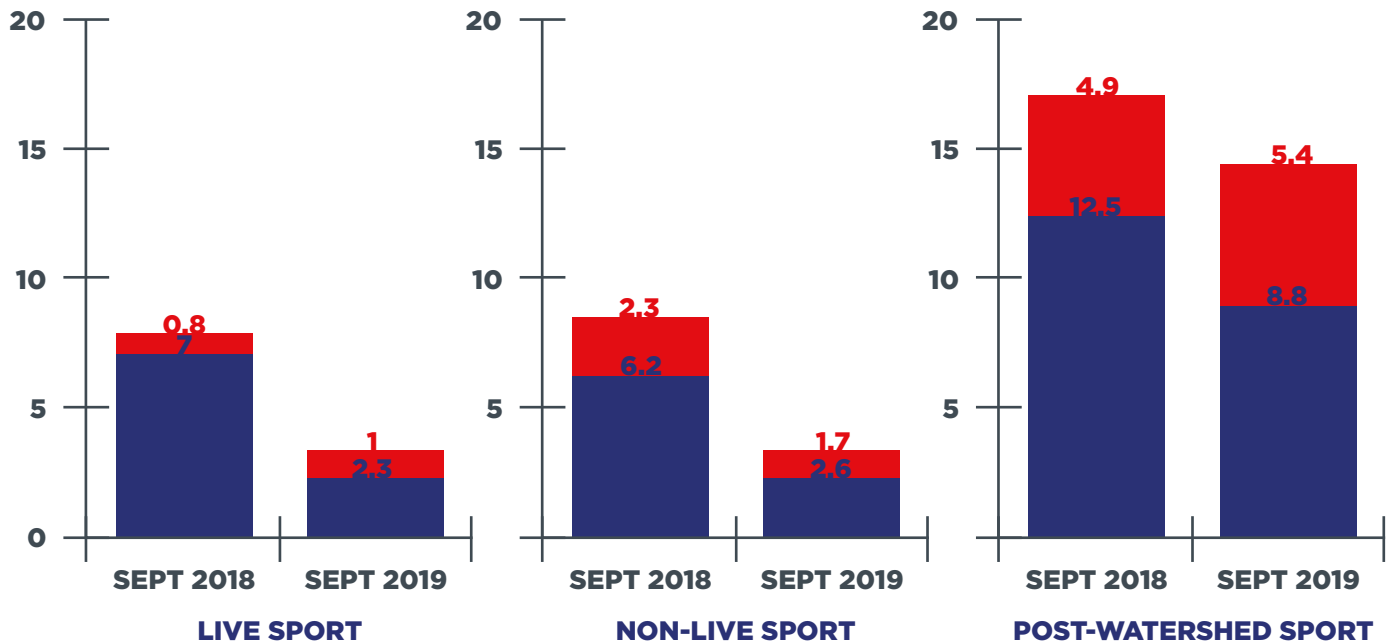
Consumption of adverts is not tied to the volume of advertising<sup>13</sup>, however analysis shows that between the comparative periods the hourly output of sports-gambling advertising around sports-programmes fell 47%. The removal of sports-gambling advertising during the W2W period also appears to have impacted the promotion of other forms of gambling, with views of non-sports-gambling (bingo, lotteries and scratch cards) also down 59% during the W2W period, resulting in nearly 100 million fewer overall views of gambling adverts.

- - Sports gambling advertising
- - Other gambling advertising

[Source: Enders Analysis, BARB/ AdvantEdge]

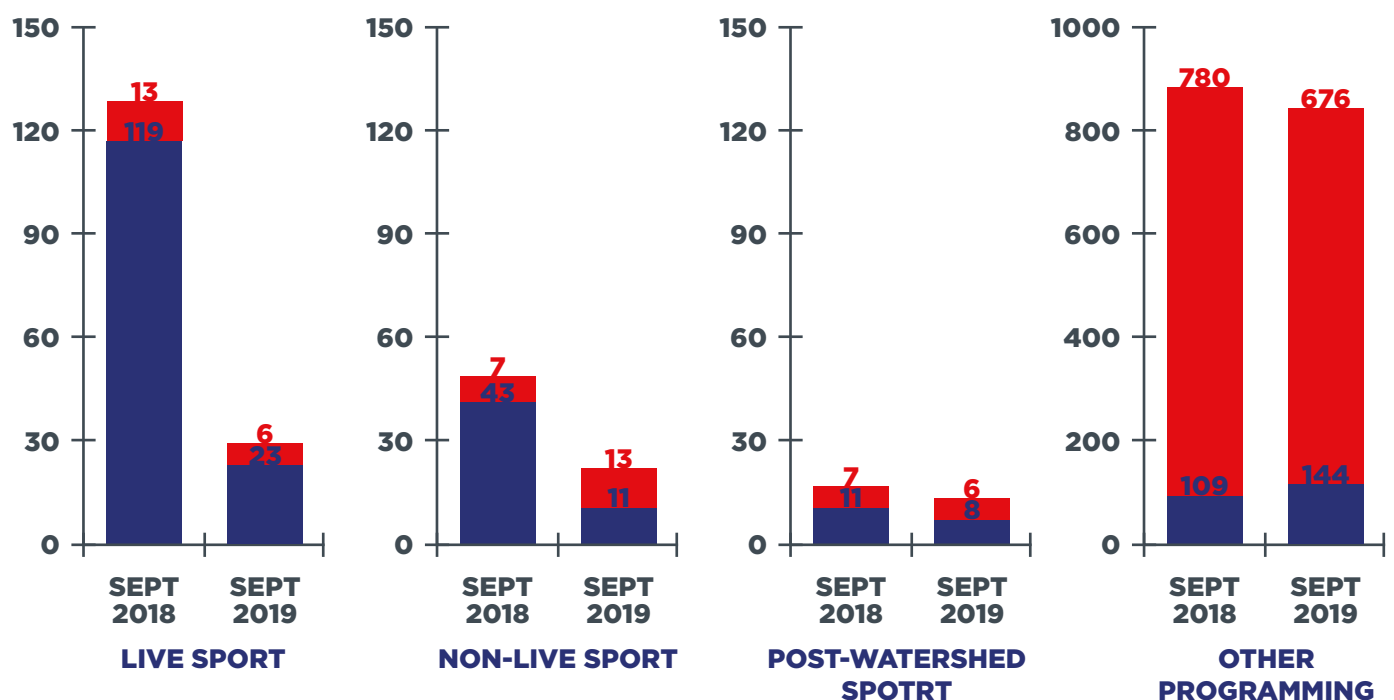
Sports-gambling remains the largest gambling format advertised around live televised sport, but the scale of reduction in sports-gambling advertising has not been matched by other gambling categories (bingo, casinos, lotteries and scratch cards) which have increased advertising output around post-watershed sport.

### HOURS OF GAMBLING ADVERTS BROADCAST BY TYPE OF PROGRAMME DURING WHICH THEY WERE BROADCAST



- - Sports gambling advertising
- - Other gambling advertising

### VIEWING OF GAMBLING ADVERTS BY TYPE OF PROGRAMME DURING WHICH THEY WERE BROADCAST (COMMERCIAL IMPACTS, MILLIONS)



## METHODOLOGY

Enders Analysis compared gambling advertising across the four weekends situated wholly within September 2018 against the same weekends in September 2019. The weekend period is defined as being from 17.00 on Friday to 05:59 on Monday.

Sports broadcasts were identified and compiled on a programme by programme basis using the genre category of “sports” within BARB’s (Broadcasters Audience Research Board) database<sup>14</sup>. BARB is the organisation responsible for measuring UK television audience share and output. BT Sport’s channels were added separately, as they are not categorised as “sports” on BARB.

Gambling adverts were compiled using the BARB-defined mid-category of “Gambling”.

The two datasets were then matched to identify which sports broadcasts had gambling adverts during the programme’s duration. (Duration as defined by the broadcaster).

From this smaller dataset of sports broadcasts containing gambling adverts, the broadcasts showing live sport were identified first. The assessment of whether a sports programme was live only covered programmes that started broadcast prior to the 9pm watershed.

Then, to determine what adverts fell within the “whistle-to-whistle” period, the start and finish times of the actual live event or match were determined as best as possible using public sources.

<sup>14</sup> Genre categorisation is compiled by broadcasters and is not independently verified

## GLOSSARY

<b>Commercial impact (CI)</b>	The metric for measuring viewership of adverts. One commercial impact means one advert was seen by one person. Ratecard weighted commercial impacts are the specific metric used in this analysis
<b>Whistle-to-whistle period</b>	The period from five minutes before a live sporting event begins until five minutes after it ends. Excludes horse and greyhound racing
<b>Live sport pre-watershed</b>	Programme slots defined as sports (see methodology), which started broadcast prior to the 9pm watershed, where at least some of the slot showed a live sporting match/event
<b>Post-watershed sport</b>	All programme slots defined as sports (see methodology), where the slot begins after the 9pm watershed
<b>Other programming</b>	This covers all programme slots not defined as sport (see methodology) during which there is gambling advertising
<b>Sports-gambling advertising</b>	All adverts which are categorised as “gambling –sports”. This categorisation is not done by Enders Analysis
<b>Other gambling advertising</b>	This is a grouping of all advertising categories other than “gambling – sports”. This includes: bingo; lottery; online casino; poker; scratch cards; and “gambling – other”
<b>Non-live sport pre-watershed</b>	Programme slots defined as sports (see methodology), which started broadcast prior to the 9pm watershed, where none of the slot showed a live sporting match/event