

Review of Gambling Machines – Call for Evidence
Gambling, Licensing and Lotteries Team
Department for Culture, Media and Sport
4th Floor, 100 Parliament Street
London SW1A 2BQ

2 December 2016

Dear Sir or Madam

Review of Gaming Machines and Social Responsibility Measures

Attheraces (“ATR”) produces and broadcasts a dedicated 24 x 7 horseracing channel called AT THE RACES covering UK, Irish, French, US, Australian, South African, Japanese and Hong Kong horseracing, which is made available in satellite and cable television carriage providers’ basic channel packages in the UK and Ireland.

We restrict our response to the issue of advertising of gambling on television from the standpoint of a non-terrestrial broadcaster but support the wider response to this review on behalf of British horseracing by the British Horseracing Authority.

Non-terrestrial TV and gambling advertising

- ATR’s business model for the Channel is dependent on gambling advertising which, at present, mainly involves sponsorship of its horseracing coverage by responsible bookmakers (although the focus could switch to spot advertising in the future).
- Gambling advertising, in particular, bookmaker advertising, provides a natural fit for the Channel given the focus on betting markets in the editorial content of the Channel. The betting markets on horseracing are integral to the narrative for horseracing and help shape the nature of horseracing in the UK so are of interest to punters and non-punters alike. Bookmaker sponsorship funds the production of UK horserace programming for the Channel, which in turn provides revenues to British horseracing through media rights payments to the racecourses. The availability of the Channel in basic channel packages, rather than being a subscription television channel, ensures a wide audience for British horseracing which helps support the on-course sponsorship activities of ATR’s racecourse partners and boosts prize money. The monthly reach of the Channel was 1.8million individuals in October 2016 (Source: BARB/Nielsen).
- Bookmaker sponsorship credits are carefully vetted before appearing on the Channel to ensure that they comply with the Ofcom Code of Sponsorship and the Gambling Industry Code for Socially Responsible Advertising.

- At least 98% of the audience viewing the Channel at any time is over 18 years old. The other metrics for the audience of the Channel for the period January – October 2016 are as follows:

Men	79%
Women	19%
18-34s	5%
35-54s	15%
55-64s	39%
65+	39%
ABC1 16+	32%
C2DE 16+	66%
ABC1 Men 16+	26%


(Source: BARB)

- The specialist nature of the Channel attracts informed, knowledgeable horseracing enthusiasts as viewers who would be accustomed to the close and long-standing connection between horseracing and betting.

Impacts of any potential changes

- Any change in Government policy around broadcasting of gambling advertisements and/or bookmaker sponsorship of horserace programming would have a significant and damaging impact on the business model for the Channel which could render the Channel unviable. It would also have a detrimental impact on the monies that go back to horseracing, affecting the economic model of the sport.
- If gambling advertising and/or bookmaker sponsorship of horseracing programming was banned before the 9pm watershed, this would affect the majority of UK horserace coverage on the Channel as only just over 1% of ATR's total UK races which are broadcast on the Channel take place after 9pm.
- The sponsorship slots currently taken by bookmakers on the Channel would not be easily filled by other sponsors if bookmaker sponsorship was banned or restricted to a post-9pm watershed. The only non-bookmaker sponsor of horseracing on British television in the last 10 years has been Dubai and it will be ceasing its terrestrial television sponsorship arrangements at the end of 2016. The sponsor of ITV Racing from 2017 will be William Hill.

Yours faithfully



Director of Strategy and Communication