



ONE VOICE

About ISBA

1. ISBA represents the UK's advertisers. Our history dates from 1891 when a group of seven advertisers came together to challenge newspapers that were declining to share circulation figures. We have championed the needs of advertisers ever since, working to ensure that our members are able to advertise responsibly in a safe and diverse media landscape.
2. Our membership has grown to include the majority of the UK biggest advertisers and best loved brands old and new, in the private, public and third sectors. As well as providing members with a forum in which to share best practice and address industry-wide challenges, we give them access to high-quality, relevant training and professional development, insight and benchmarking data. With our unique perspective as the only trade organisation representing advertisers exclusively, we play an important advocacy role, ensuring our members' interests are clearly understood by media owners and platforms, media agencies regulators and Government and are reflected in their decision-making.
3. Under the leadership of Phil Smith since 2017, ISBA has focused its attention on creating a responsible, accountable and transparent media marketplace that works for advertisers; fostering innovation to improve effectiveness; ensuring advertisers have choice in the breadth and quality of media; and promoting a strong self-regulatory environment.
4. ISBA is a member of the Advertising Association and represents advertisers on the Committee of Advertising Practice and the Broadcast Committee of Advertising Practice, sister organisations of the Advertising Standards Association, which are responsible for writing the Advertising Codes. We are also members of the World Federation of Advertisers. We are able to use our leadership role in such bodies to set and promote high industry standards as well as a robust self-regulatory regime.
5. As members of the Advertising Association we support its separate submission to the Committee. Nevertheless, there are some areas where our members, the advertisers, have a distinct perspective that we would like to share with the Committee and as such have responded to a number of questions posed by the Committee. We strongly support the ASA self- and co-regulatory system and its evidence-based approach to code-making.

Do you support this package of measures to address concerns about gambling advertising?

6. We welcome the opportunity to respond to the DCMS call for evidence and focus our comments on this question only.
7. We support the Government's objective to strike the right balance between socially responsible growth and the protection of consumers and wider communities. ISBA and the gambling operators in our membership are committed to rigorous and effective self-regulation, enforceable by the ASA and, for the gambling companies, through their licence requirements set by the Gambling Commission.
8. We welcome the Government's support for the industry's collective offer to develop a media campaign to promote responsible gambling behaviour, led by GambleAware.

9. GambleAware is a member of ISBA and we will support the campaign in two ways:
 - a. supporting GambleAware running a best-practice procurement process in order to secure the best consultancy support to develop and implement the campaign;
 - b. participation in the campaign governance
10. We welcome the Government's recognition that the self- and co-regulatory system "works well and the Government continues to support it." ISBA is a member of CAP/BCAP, is participating in the development of new guidance around gambling advertising and encouraged and supported our members to engage constructively with the process.
11. We support the actions proposed by the Gambling Commission, GambleAware and others to promote greater social responsibility in advertising, including the further research commissioned to explore the effects of marketing and advertising on children, young people and vulnerable groups.
12. Finally, we wish to note that while there is not a consensus among our gambling members on the question of limiting the volume of broadcast advertisements and that there is no evidence of public harm, a number of our members are open to the proposition and were disappointed that the Government did not take the opportunity of this consultation to address this issue. ISBA is willing to explore this further with Government and with our membership