



Consultation on proposals for changes to Gaming Machines and Social Responsibility Measures

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Viacom International Media Networks (VIMN) owns or part-owns and operates more than 25 TV channels in the UK attracting close to 12% of viewing among 16-34 year-olds, and making it the third-biggest privately held broadcast media group in the UK market (after Sky and ITV).

We welcome the opportunity to respond to this consultation and set out a brief comment on *Q.13 Do you support this package of measures to address concerns about gambling?* Our views should be read as complimentary to those submitted by the Advertising Association.

We appreciate the Government's support for the co-regulatory system which imposes the CAP and BCAP codes on broadcasters and publishers. Robust enforcement of these codes by the ASA, with Ofcom as the powerful backstop regulator, ensures high standards of compliance. We are supportive of the development of new guidance on gambling by BCAP/CAP that is currently underway.

The Government is right to acknowledge that without appropriate content and volume controls advertising is just one of many environmental factors which can contribute to the prevalence of problem gambling, but also that broadcasting is already very heavily regulated in this area in the UK. Whilst it might therefore be an attractive policy option simply to increase advertising restrictions, the current rules are evidence-based and any decision to further restrict gambling advertising could do significant damage to the UK broadcasting industry without decreasing rates of problem gambling.

The Government has also recognised that behavior change campaigns can play an important role in addressing societal harms if delivered effectively. VIMN welcomes the Government's support for the initiative put forward by broadcasters and the gambling industry to fund and work with GambleAware to deliver a major responsible gambling advertising campaign. This will transform GambleAware from a well-regarded and respected charity to a robust and effective campaigning organisation.

Finally, we note the Government's view that it "would encourage others who benefit from gambling advertising, including social media platforms and sports bodies, to look at how they can contribute to raising awareness of the potential risks". Given the rapidly changing consumer media habits we would urge the Government and the Gambling Commission to work even more closely with social media companies to help them find ways to play a more proactive role to reduce problem gambling.

For further information please contact:

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