



SKY UK'S RESPONSE TO THE GOVERNMENT'S CONSULTATION ON PROPOSALS FOR CHANGES TO GAMING MACHINES AND SOCIAL RESPONSIBILITY MEASURES

1. Sky welcomes the opportunity to respond to the Government's consultation. We are responding to the call for evidence specifically on Q13: *Do you support this package of measures to address concerns about gambling advertising?*
2. We agree with the analysis set out in the consultation document on gambling advertising and are supportive of the approach the Government has adopted. It is the right approach to put confidence in the self and co regulatory system to review the evidence and make appropriate changes to rules and supporting the broadcasters and gambling industry in the responsible gambling advertising campaign.
3. As a highly regulated and responsible broadcaster protecting children watching our channels is paramount, and we're confident children are not exposed to an excessive number of TV gambling ads. The average child saw 2.4 gambling ads each week in 2017, less than 2% of all the TV ads they see. This number is falling as well, down from an average of 4.1 ads per week in 2012.
4. The focus of this consultation is quite rightly the incidence of problem gambling and whether the gambling industry is behaving in a socially responsible way to protect consumers and communities. Advertising (and television advertising in particular) is an important part of the gambling industry, but it is a part where there are strict rules in place to prevent potential harm to children and vulnerable adults.
5. We're confident that the strict content and scheduling rules in place set the right level of protection for young and vulnerable people.¹ But we also agree this is an issue that requires regular scrutiny, which is why we support the decision by CAP and BCAP to review the guidance on gambling advertising to ensure it does not promote problem or risky gambling behaviours.
6. We also recognise that more can be done to counter-balance some of the gambling advertising messaging that viewers are exposed to and as TV broadcasters we've also stepped up to our responsibility to protect viewers. Along with gambling operators we've committed to funding a major GambleAware advertising campaign promoting responsible gambling behaviour. We will use our television and digital inventory to make sure the campaign reaches the demographics that have been highlighted as being most at risk, and will ensure ads are seen around high profile football matches, for example. We are working closely with GambleAware to begin preparations for this campaign.
7. Separately from the campaign we have recognised that more can be done to highlight GambleAware to those most at risk of problem gambling. We have made an editorial decision to display the BeGambleAware.org logo on screen when we display odds on Sky Sports or Sky

¹ <https://www.cap.org.uk/News-reports/Media-Centre/2014/Gambling-advertising-review.aspx>

Sports News. Although we are clear that the use of odds is a narrative device to bring a sports story to life and in no way promotes specific or general gambling, we also recognise that odds can be triggering for those recovering from or susceptible to gambling addiction.

Figure 1: Example of how BeGambleAware.org is displayed when match odds are shown on Sky Sport



8. We welcome the Government's commitment in the consultation to use the Digital Charter to 'look at creating 'a framework for how businesses, individuals and wider society should act online... [and] how big tech companies can play their part in tackling emerging challenges, such as online harms'.
9. The Gambling Commission and the advertising regulators have made efforts to ensure gambling operators are regulated to the same standard online as offline, but it is important to contrast the responsibility of television broadcasters and online platforms. We note that while television broadcasters have committed to funding a new GambleAware campaign and are working with the advertising regulators to make sure the rules are fit for purpose, online platforms have not. This is ultimately down to the regulatory framework that underpins advertising where TV broadcasters risk their licence to operate and the mechanisms already exist in law to impose new TV advertising restrictions. Online platforms do not have the same risk to their business models, although they are equally as responsible to their customers and users as broadcasters for preventing gambling related harms.
10. Sky operates a number of popular websites and apps such as the Sky Sports app and Sky News app as well as substantial on-demand television services such as Now TV, Sky Go and Sky On-demand. Although the regulatory standard for these services is lower than television we treat these services as if they were linear TV for regulatory purposes. We would be happy for the regulation online to be brought up to linear television standards for our services.