Features Used in Online Slot Game Adverts: A Content Analysis and Deliberative Ranking

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THE BEHAVIOURAL INSIGHTS TEAM

THE GAMBLING POLICY & RESEARCH UNIT
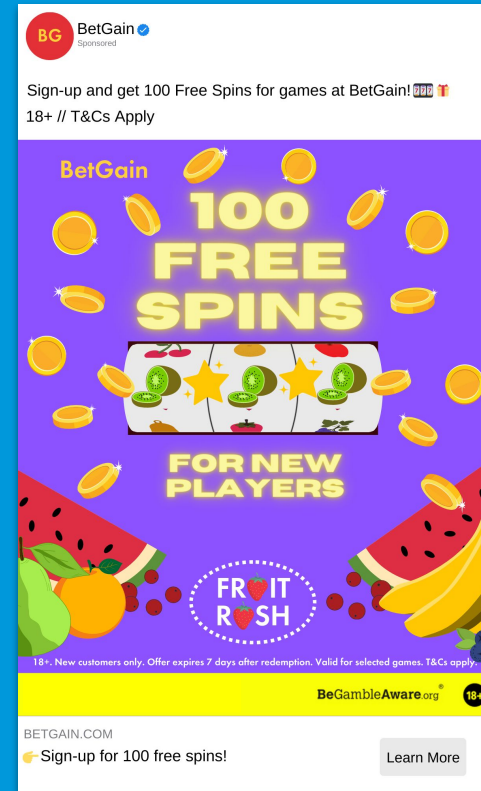
Executive summary.

We conducted a study of 100 online slot game adverts from August 2022 to February 2023. We looked for features that could mislead people or encourage them to gamble more than they can afford.

The most common features in slot game adverts that we found included:

- **Incentives were the most common feature in slot game adverts.** They were often targeted at new customers, and they could be very effective in enticing people to gamble. For example, an advert might offer free spins or a bonus if someone signed up for a new account.
- **Many ads were misleading about the risk of gambling.** Many adverts did not include odds information, which made it difficult for people to assess the true risk of gambling. Additionally, some adverts used vague language or focused on the potential wins, which could give people the impression that gambling was a sure thing.
- **Terms and conditions were often not prominent in slot game adverts.** This meant that people might not be aware of the important details, such as wagering requirements or maximum bets.

Finally, the features were ranked based on predictions on their risk of harm.

Next, we will conduct online experiments to see how different slot game advert features impact gambling behaviours and attitudes. We will try to distinguish between adverts that fulfill their commercial objectives and adverts that cause harm.

A mock-up based on our findings of a 'typical' slot game advert, shared on social media platforms in the UK.

NB the mock-ups use a fictional operator (BetGain) and slot game ('Fruit Rush').

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Executive summary: we designed two slot game adverts to exhibit the features identified that may result in harm.

BG **BetGain** ✔
Sponsored

🎁 £50 bonus + 100 FREE spins for new players!
💰 Get your thrill with more ways to win on Fruit Rush

18+, http://begambleaware.org/

£50 WELCOME BONUS!
WHEN YOU DEPOSIT £10
+ ✂ 100 FREE SPINS

FR🍓IT R🍓SH

18+. New customers only. 100 Free Spins credited instantly. £50 bonus within 48hrs of deposit.
Accept offer within 3 days. Wager reqs apply (bonus only). Valid for selected games.
Opt-in req. Customer verification may require deposit. T&Cs apply.

BETGAIN.COM
Get £50 + 100 FREE spins!
Fruit Rush is waiting for you 👉

Sign Up

We hypothesise that, without the following features, adverts can achieve commercial impact, but with them, adverts may cause harm.

Win made salient (e.g. capitalised text, referring to the outcome concrete language, money emojis).

Implies positive influence on **emotional state.**

T&Cs that don't apply are more salient than those that do.

Referencing attributes to **lower perceived risk.**

No explicit in-text **references to gambling** and/or the slot game.

Overstating **control** for a game of chance.

None, or less salient, **safer gambling logos.**

BG **BetGain** ✔
Sponsored

Trigger the bonus round and feel the rush! 🚀
All wins paid in CASH, no deposit and no wagering!!! 💰

FR🍓IT R🍓SH

NO DEPOSIT NEEDED!

5,000X RUSH MULTIPLIERS

BetGain

18+. New customers only. Valid for selected games. T&Cs apply.

BeGambleAware.org 18+

BETGAIN.COM
There's no wagering, so you'll keep everything you win!
Rush to the JACKPOT! 👉

Sign Up

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Definitions of technical terms. (1)

Term	Definition
Advert contents	What the advert includes, such as text (copy) and visuals (creatives).
Advert feature	An element of an advert that serves a distinct purpose, such as an incentive, T&C, or call to action button.
Animated advert	Promotion of a product using a medium with dynamic (i.e.) moving graphics, such as animation or videos.
Static advert	Promotion of a product using a medium with still graphics, such as images.
Bonus	A monetary value credited to an individual's account.
Content analysis	This is a technique that involves the labelling and analysis of adverts to determine patterns in their contents.
Free spins	A number of spins that can be redeemed at no cost to the individual. Typically have a fixed £ value.

Definitions of technical terms. (2)

Term	Definition
Gambling harm	The adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society.[1]
(Advertising) impact	The degree to which an advert fulfils its commercial objectives e.g. generates return on investment from the marketing spend.
Incentive	A reward offered to an individual to entice them to sign up and/or deposit funds.
In-game offer	An incentive with no pre-specified value; the value is instead determined during gameplay.
Multiple incentives	The advert offers two distinct incentives, which can either be the same (e.g. 200 + 50 free spins) or different (100 free spins + £10 bonus) types.
Terms & Conditions (T&Cs)	Rules which qualify how an incentive can be redeemed.
Wagering requirement	The amount an individual must spend in order to withdraw the value of an incentive (e.g. a 40x wagering requirement for a £50 bonus would require someone to spend £2,000 in order to withdraw the £50 bonus).

[1] Wardle, H., Reith, G., Best, D., McDaid, D., & Platt, S. (2018). *Measuring gambling-related harms: A framework for action.* Available at: https://www.begambleaware.org/sites/default/files/2020-12/measuring-gambling-related-harms-10-july-2018.pdf

This report analyses online slot game adverts and the incentives that are used to entice customers

Section	PuDescription	Slides
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2. Methodology	Explains the study's research design and analytical strategy.	11-14
3. Adverts features	Highlights the prevalence of advert features and how they are used.	15-22
4. Advert features at risk of harm	Sets out the advert features that we predict could mislead, encourage harmful gambling, or both. This includes the results of our deliberative ranking exercise.	23-31
5. Detailed advert features	Presents additional descriptive findings of our analysis.	32-38
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Section 1: Background

The study's context and aims.

THE
**BEHAVIOURAL
INSIGHTS
TEAM**

THE
**GAMBLING
POLICY &
RESEARCH
UNIT**

Gambling adverts promote gambling, but little is known about which specific advert features drive behaviour change and whether this influence is harmful.

The latest data indicates the UK gambling industry spent more than £1.5 billion a year on advertising in 2017, a figure which increased by 56% between 2014 and 2017.[1] The existing evidence suggests that advertising achieves its intended purpose to encourage sign-ups and deposits, and that exposure may lead to more frequent and riskier gambling – but it is not clear when this impact shifts from being appropriate to harmful.[2] This study therefore looks to generate new evidence to explain what specific features (e.g. incentives, T&Cs) or contents (e.g. text, visuals) of gambling adverts influence behaviour.

This deck presents the **results of two activities**:

1. Content analysis

We analysed a sample of 100 slot game (*see Appendix A)* adverts from social media platforms, with the goal of identifying
(i) the specific design features used in gambling adverts;
(ii) whether any of these features were potentially harmful.

2. Deliberative ranking exercise

The project team and policymakers ranked the most harmful features of slot game adverts. This ranking will be used to decide which features to test in online experiments, along with other factors such as policy impact and feasibility

[1] House of Lords. (2020). *Gambling Harm - Time for Action.* https://committees.parliament.uk/publications/1700/documents/16622/default/.

[2] Hanss, D., Mentzoni, R. A., Griffiths, M. D., & Pallesen, S. (2015). The impact of gambling advertising: Problem gamblers report stronger impacts on involvement, knowledge, and awareness than recreational gamblers. *Psychology of addictive behaviors*, *29*(2), 483.; Newall, P. W., Moodie, C., Reith, G., Stead, M., Critchlow, N., Morgan, A., & Dobbie, F. (2019). Gambling marketing from 2014 to 2018: A literature review. *Current Addiction Reports*, *6*(2), 49-56.; Bouguettaya, A., Lynott, D., Carter, A., Zerhouni, O., Meyer, S., Ladegaard, I., ... & O'Brien, K. S. (2020). The relationship between gambling advertising and gambling attitudes, intentions and behaviours: a critical and meta-analytic review. *Current Opinion in Behavioral Sciences*, *31*, 89-101.; Ipsos MORI. (2020). *Final Synthesis Report: The impact of gambling marketing and advertising on children, young people and vulnerable adults.* Gambling Commission. (2021). *Understanding how consumers engaged with gambling advertising in 2020.* BIT. (2022). *Comprehension of gambling odds.* McGrane, E., Wardle, H., Clowes, M., Blank, L., Pryce, R., Field, M., Sharpe, C., & Goyder, E. (2023). What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature. *Public Health, forthcoming.*

Our first research questions (1-3) were concerned with understanding the specific features and contents used in online slot game adverts.

Research question

1. What are the **features** of online slot game adverts in the UK and how are they used?

2. What **incentives** do online slot game adverts in the UK adopt?

3. How are **terms and conditions (T&Cs)** presented in online slot game adverts?

What we measured

Key: **part of the advert; advert feature; advert contents**
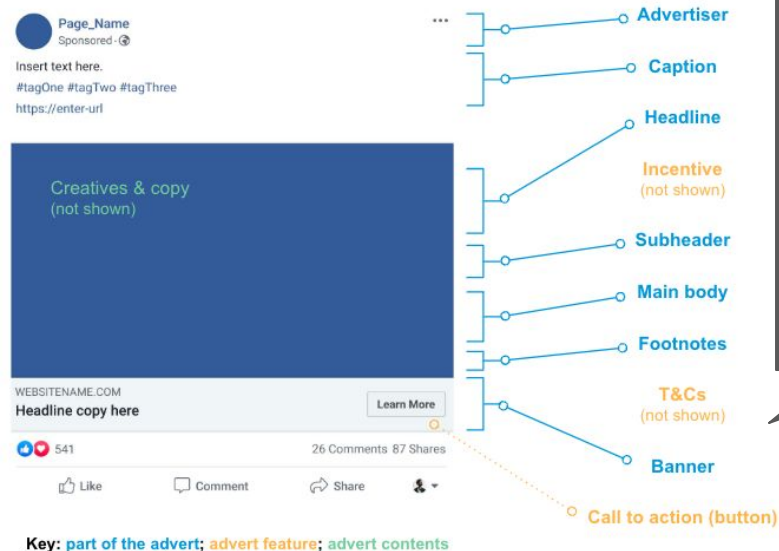
This blueprint outlines how we divided an advert into its components, so that we could measure specific features in different parts of the advert.

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Our final research question (4) was concerned with identifying what advert contents and features may result in harm.

Research question

4. Are any **features** within online slot game adverts used in a way that could **cause harm**?

Harm is defined as an advert's feature that a) misleads, and/or b) encourages harmful gambling. More information on the framework we used can be found in Appendix A.

What we measured

We predicted which features of online slot game adverts could be harmful, and created ways to measure whether they existed and how. This was based on existing evidence, the study's pilot, and feedback from the Committee of Advertising Practice (CAP). The primary ways we measured potentially **harmful features** were:

Feature	Rationale for defining as potentially harmful
It is not clear the product advertised is gambling, or the nature of the risk involved.	Individuals may make a transactional decision based on incomplete information.
Overstates the chances of receiving a low-probability win (e.g. jackpot).	Individuals may overestimate their chance to achieve a high win, encouraging harmful play.
T&Cs that do not apply (e.g. "No deposits required") are more salient than those that do.	This may be misperceived as lowering risk, and/or reduce engagement with T&Cs that do apply.
Advert and website T&Cs contradict.	The individual may make a transactional decision based on false information.

We then conducted a deliberative ranking exercise to collect predictions on which of these features could be most harmful.
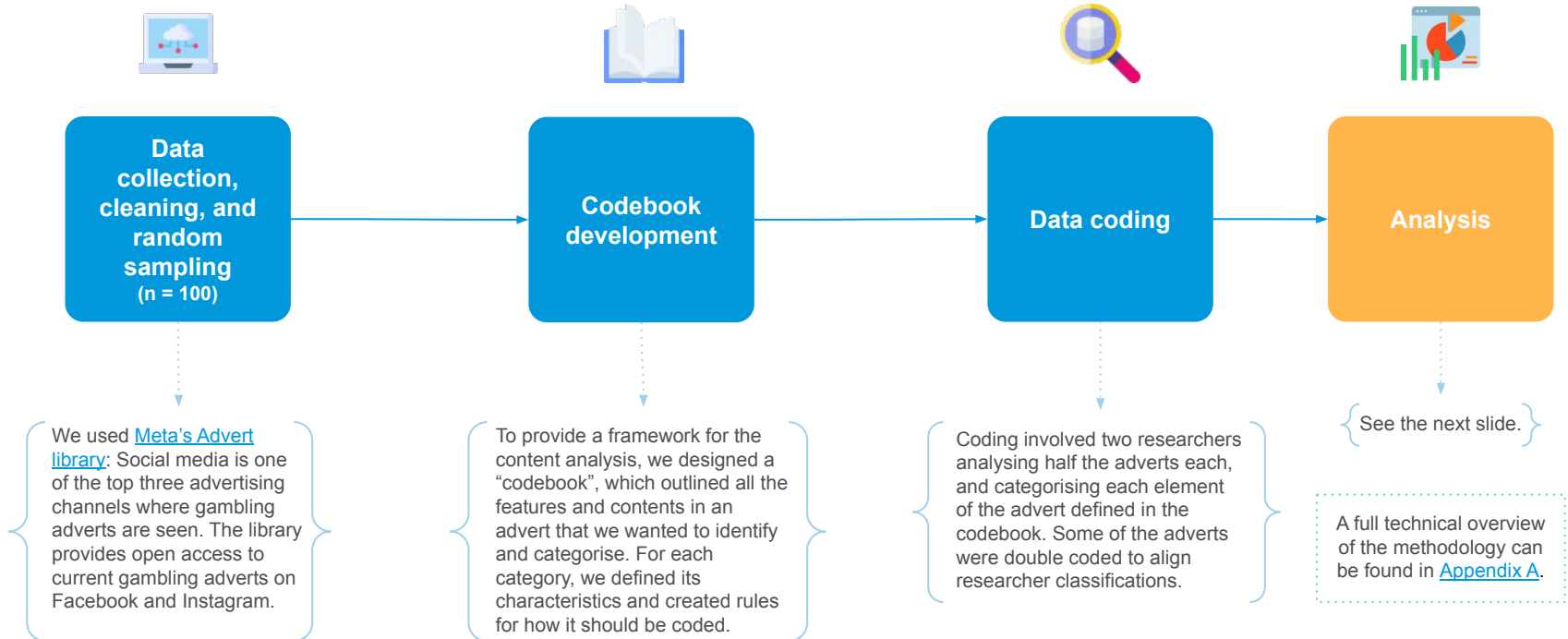
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Section 2: Methodology

The study's research design and analytical strategy.

The content analysis involved four stages: 1) data collection & cleaning; 2) codebook development; 3) coding; 4) mixed-methods analysis + ranking.

Content analysis involves the labelling and analysis of adverts to determine **patterns in their contents**.

Data collection, cleaning, and random sampling (n = 100)	Codebook development	Data coding	Analysis

We used Meta's Advert library: Social media is one of the top three advertising channels where gambling adverts are seen. The library provides open access to current gambling adverts on Facebook and Instagram.

To provide a framework for the content analysis, we designed a "codebook", which outlined all the features and contents in an advert that we wanted to identify and categorise. For each category, we defined its characteristics and created rules for how it should be coded.

Coding involved two researchers analysing half the adverts each, and categorising each element of the advert defined in the codebook. Some of the adverts were double coded to align researcher classifications.

See the next slide.

A full technical overview of the methodology can be found in Appendix A.

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We conducted mixed-methods analysis, followed by a deliberative ranking exercise of the content and features within gambling adverts

| Description	Outputs
Part 1.1: Descriptive statistics + text analysis To summarise the prevalence of content and features, as well as the range and scale of potential issues (misleading and/or irresponsible features).	In-text summaries, tables, charts + advert mockups.
Part 1.2: Deductive content analysis A qualitative review of the coded data to explore, interpret and predict impact. It identified a range of potentially harmful features and grouped them by themes.	Integrated into discussion of descriptive statistics and implications.
Part 2: Deliberative ranking of features that could cause harm From a short-list of 18 potentially harmful features, we asked the project team and external policymakers, to rank the list of features from most to least harmful.	Rankings chart.

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We analysed 100 slot game adverts from Facebook and Instagram.

Our sampling criteria was informed by three factors:

1. **Estimation of what gambling products are advertised most frequently**: slots are the largest contributor to financial harm (based on gross gambling yield), and are reported to be the second highest provider of advertised incentives. These metrics were used to estimate potential advert content, as we found no open access data that broke down advertising expenditure by gambling type.[1]

2. **Estimating which advertising channels operators use most:** social media is where consumers – particularly those at higher risk of harms – are frequently exposed to gambling ads (after TV and websites).[2]

3. **Feasibility of accessing and collecting data:** social media – specifically Meta – has the largest open-access database, which can be accessed and analysed within this study's timeframe.

What our sample looked like:

% 10 20 30 40 50 60 70 80 90 100
Key: 1% = 1 block = 1 Ad
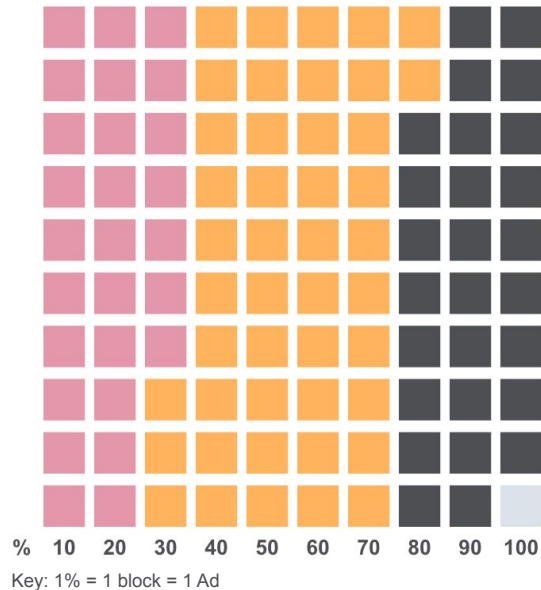
Over 1 in 4 (27%) of our advert sample were animated – included video graphics/text. The rest were static.

Most (72%) of our sample were adverts posted in September. We reviewed adverts shown between March and September 2022

The majority (99%) were sponsored adverts, meaning the advertiser has paid to show the advert to a specific audience.

See Appendix B for how the sample was split by operator and date of posting.

[1] The Gambling Commission. (2022). *Gambling Industry Statistics*. [2] The Gambling Commission. (2021). *Understanding how consumers engaged with gambling advertising in 2020*; Gainsbury, S. M., King, D. L., Russell, A. M., Delfabbro, P., Derevensky, J., & Hing, N. (2016). Exposure to and engagement with gambling marketing in social media: Reported impacts on moderate-risk and problem gamblers. *Psychology of Addictive Behaviors*, *30*(2), 270.

Section 3: Advert features

The prevalence of advert features and how they are used.

Main findings

A mock-up based on our findings of a 'typical' slot game advert, shared on social media platforms in the UK.

NB the mock-ups use a fictional operator (BetGain) and slot game ('Fruit Rush').

1. Online slot game adverts often offer incentives, such as free spins, to entice people to gamble.

2. Incentives are often featured prominently in adverts, but the terms and conditions (T&Cs) are often buried in less prominent parts of the advert

3. T&Cs can have high consequences for withdrawing funds, but they are often not easy to find

4. Most adverts signpost to BeGambleAware, but further practices to promote transparency and safer gambling are less common.

5. No adverts mentioned odds information

¹ BIT. (2022). _Comprehension of gambling odds_.

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A typical advert offered free spins for new customers, encouraging them to find out more about the game and sign-up to the operator

BG BetGain ✔
Sponsored

Sign-up and get 100 Free Spins for games at BetGain! 🎰🍒
18+ // T&Cs Apply

BetGain
100 FREE SPINS
FOR NEW PLAYERS

FRUIT RUSH

18+. New customers only. Offer expires 7 days after redemption. Valid for selected games. T&Cs apply.

BeGambleAware.org® 18+

BETGAIN.COM
👉 Sign-up for 100 free spins!

[Learn More]

We designed this 'typical' online slot game advert based on the most prevalent features identified (present in >50% of our total sample*). This will form the basis of the adverts tested in forthcoming experimental research.

*If a feature was not used in the same way in 50%+ of our sample, we selected the next most common approach.

The top 3 types of primary content (%)
i.e. what contents in the advert occupied the most space?

Incentive(s) 58%	Game graphics 28%	Game name 7%

Proportion of adverts by the top 3 types of call to action (%)
i.e. how does the advertiser want the audience to respond?

Read more 43%	Sign-up 33%	Redeem offer 11%
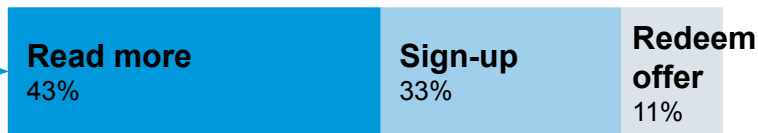
NB Adverts sometimes used different calls to action (i.e. 'do this') in different parts of the advert. Here, we define call to action according to what was written in the banner's call to action button.
See Appendix B for a full overview of the call to action types recorded.

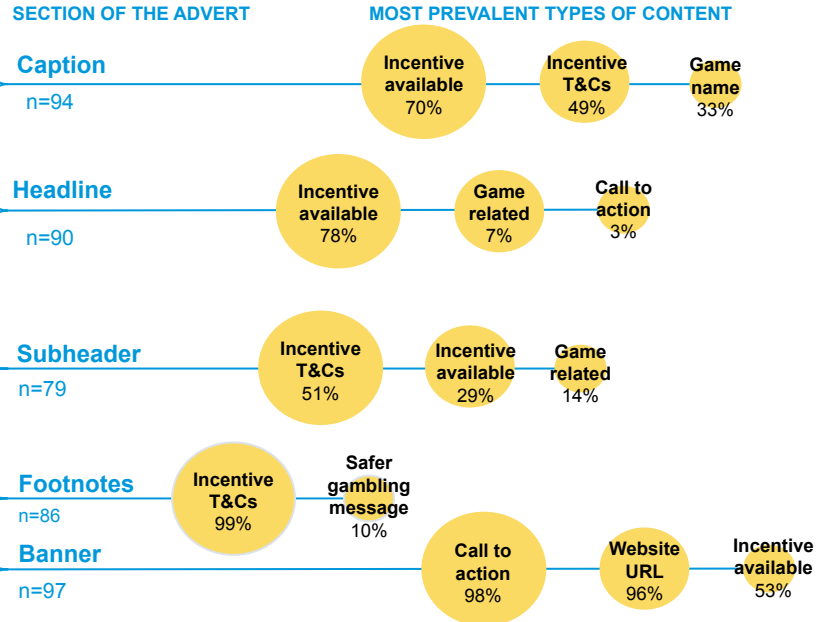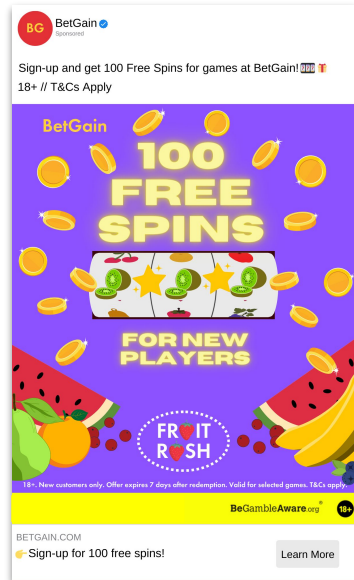Source: N=100 Meta ads collected by BIT between August-September 2022.

When a typical advert is broken down into its parts, the most prevalent type of content throughout relates to the incentive.

The prevalence of incentive-related content may have significant implications on the audience's decision to play. In an online experiment, we found offering incentives (free spins) increased how likely people felt they might win, which in turn made someone more likely to play the advertised slot game.[1]

Method:

To determine **what a typical advert looks like**, we broke it down into its main parts and measured what type of content featured in that part of the advert.

See Appendix B for a full data table of the distribution of contents by parts of the advert.

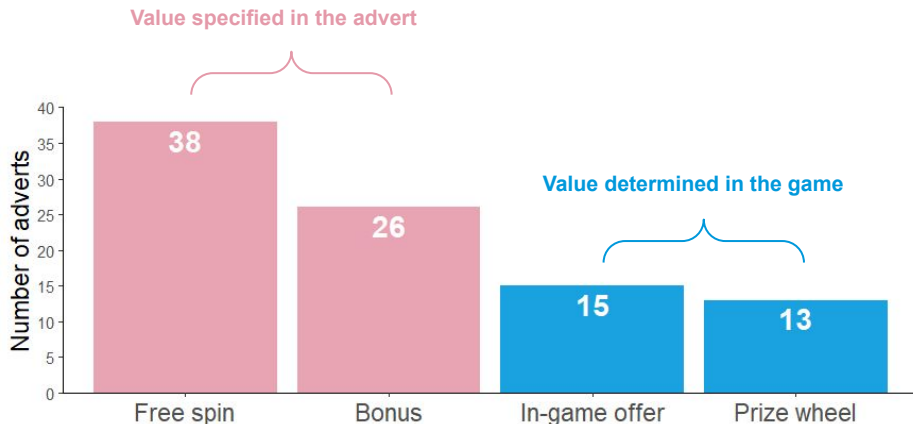**SECTION OF THE ADVERT**

MOST PREVALENT TYPES OF CONTENT

Caption n=94
- Incentive available 70%
- Incentive T&Cs 49%
- Game name 33%

Headline n=90
- Incentive available 78%
- Game related 7%
- Call to action 3%

Subheader n=79
- Incentive T&Cs 51%
- Incentive available 29%
- Game related 14%

Footnotes n=86
- Incentive T&Cs 99%
- Safer gambling message 10%

Banner n=97
- Call to action 98%
- Website URL 96%
- Incentive available 53%

[1] BIT. (2022). *Comprehension of gambling odds*.

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Most adverts included one incentive, with free spins and bonuses the most common. Some adverts offered two incentives, primarily for new customers.
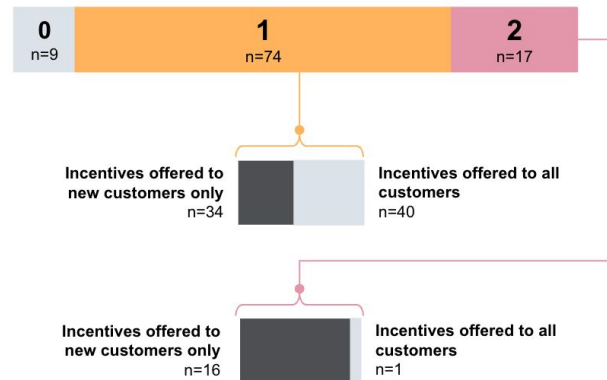
91% of adverts included an incentive. The most common incentives were free spins and bonuses with a pre-specified value. **19% of adverts offered 2 incentives** (predominantly free spins + a bonus). Single-incentive adverts were relatively evenly distributed by customer type, while double-incentive adverts were almost exclusively for new customers.

Type of incentives offered in each advert

Value specified in the advert

Value determined in the game

Number of adverts: Free spin 38, Bonus 26, In-game offer 15, Prize wheel 13

Source: N=100 Meta ads collected by BIT between Aug-Sept 2022

Number of incentives offered in each advert, split by customer type

0 n=9 | 1 n=74 | 2 n=17

Incentives offered to new customers only n=34 | Incentives offered to all customers n=40

Incentives offered to new customers only n=16 | Incentives offered to all customers n=1

See Appendix B for a breakdown of the average value of incentives, by type.

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T&Cs were disproportionately listed in less salient parts of the advert, including wagering requirements, despite having high consequences for withdrawing funds.

A wagering requirement is a minimum betting requirement that you need to meet before being able to withdraw your bonus (e.g. a 40x wagering requirement for a £50 bonus would require someone to spend £2,000 in order to withdraw the £50 bonus)

Part of the advert (parts labelled on slide 18) Key: more salient; less salient. Salience is an estimation of how likely someone is to attend to contents in that part of the advert.	Linked Website	Caption	Headline	Subheader	Footnotes	Banner
Percentage of adverts containing at least one T&C in this location	97%	47%	2%	23%	**83%**	43%
Average number of unique qualifications in this location	8.48	1.24		6.24		1.09
Top 5 T&Cs most frequently listed in the advert (type) The full list of T&Cs assessed by location is available in Appendix B.						
18+	81%	37%		75%		38%
T&Cs apply	86%	31%		80%		32%
Offer expires a certain period after redemption	77%	0%		62%		0%
Valid for selected games	69%	3%		60%		4%
New customers only	60%	8%		50%		11%
T&Cs less frequently listed but have significant consequences for the customer						
Wagering requirement	51%	0%		37%		1%

The website linked to the advert typically included a full list of T&Cs.

The types of T&Cs listed in the main part of the advert (containing the headline, subheader + footnotes) were recorded as one group. However, the highest proportion were located in the footnotes (83%); qualitative analysis confirmed most types located in the main advert only appeared in the footnotes.
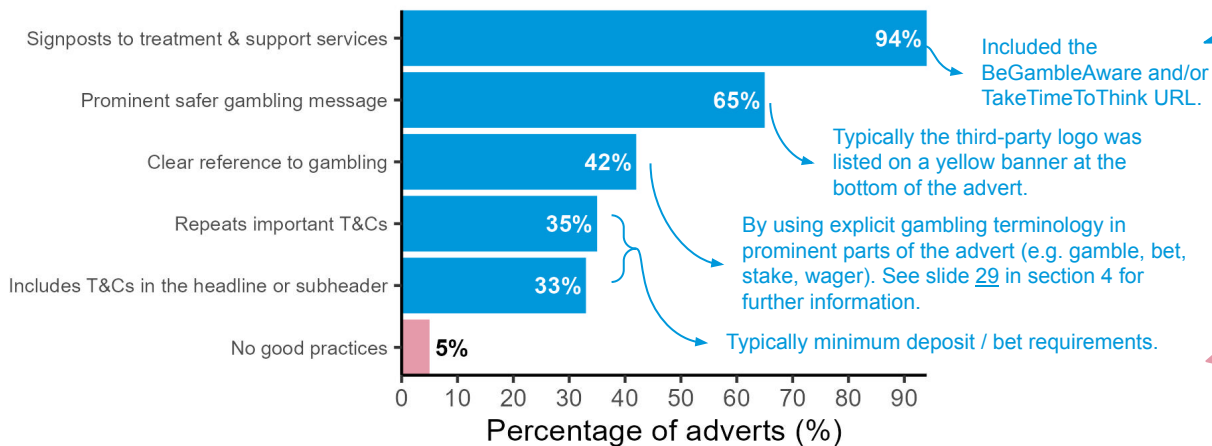*See Appendix B for how T&Cs were formatted and abbreviated in the footnotes.*

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Except listing BeGambleAware, most practices to promote transparency and safer gambling were uncommon. No adverts mentioned odds information.

5% of adverts contained none of the practices assessed. Practices were often executed at a minimal standard:
1) 72% of adverts with a logo for a third-party treatment and support made these smaller than than the advertiser's logo;
2) 83% of adverts only used basic signposting to T&Cs ("T&Cs apply") and 6% had no further signposting.

% of transparent and safer gambling practices present in the adverts

The practices assessed were based on our understanding of what would constitute transparent and socially responsible practice; note this list was not designed to be exhaustive, but rather exploratory.*

Practice	Percentage
Signposts to treatment & support services	94%
Prominent safer gambling message	65%
Clear reference to gambling	42%
Repeats important T&Cs	35%
Includes T&Cs in the headline or subheader	33%
No good practices	5%

Percentage of adverts (%)

Included the BeGambleAware and/or TakeTimeToThink URL.

Typically the third-party logo was listed on a yellow banner at the bottom of the advert.

By using explicit gambling terminology in prominent parts of the advert (e.g. gamble, bet, stake, wager). See slide 29 in section 4 for further information.

Typically minimum deposit / bet requirements.

Source: N=100 Meta ads collected by BIT between August-September 2022

* In the next phase of research, we will design an advert that incorporates these practices and test to see what aggregated impact they have (outcome measures to be determined in the next phase).

None of the 100 Adverts mentioned:

Odds information (relevant to when specific slot games were being advertised)

Gambling management tools

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The contents of most adverts included visual elements (logos, game graphics) and text elements (describing the incentive).

Adverts predominantly used visual contents to identify the **brand** and show an example of **gameplay**. Text contents was used to promote **incentives**, with an emphasis on incentives being **'free'**.

Visual contents
Top 3 most common visual elements

86%
Advertiser's logo

70%
Game graphics
Other gameplay types recorded are shown in Appendix B.

64%
Game's logo

Text contents
Frequency of words used across the salient parts of the advert

Source: N=100 Meta ads collected by BIT between August-September 2022.

Section 4: Advert features potentially at risk of causing harm

Advert features that we predict could mislead, encourage harmful gambling, or both.

Main findings

A mock-up based on our findings of a potentially harmful slot game advert, shared on social media platforms in the UK

NB the mock-ups use a fictional operator (BetGain) and slot game ('Fruit Rush').

All adverts leveraged behavioural biases in their design; the most potentially harmful applications emerged as **three groups** of features.

- **Salience of free incentives**: Adverts offer free spins or other incentives to entice people to gamble and distract from other information such as T&Cs

- **Lack of transparency**: Adverts do not clearly explain the risks of gambling, such as the odds of winning or the potential for addiction

- **Misleading depictions**: Adverts depict slot games in a way that makes them seem more exciting and profitable than they actually are.

We predict the top three of **most harmful features** to be:

1. The caption implies the individual has control over the outcomes.
2. The caption and subheader state wins for an in-game offer are instant or guaranteed.
3. The footnotes state there's a wagering requirement, but it does not specify the high wagering value.

These will be taken forward into the next phase of research.

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This section applies a behavioural lens to set out which of the advert features identified could be potentially harmful.

Approach

We identified features which are currently permitted under existing regulation, which we predict to have greater potential to cause harm than other features, by a) misleading, and/or b) encouraging harmful gambling. See Appendix A for further details on our harm framework.

Our predictions were informed by an assessment as to whether advert features leveraged behavioural biases[1].

Section contents

1) Overview of the prevalence and types of behavioural biases, and how they are leveraged by **3 groups** of potentially harmful features.

2) Mock-ups of adverts to illustrate how these **groups** of potentially harmful features emerged within our advert sample.

3) **Salience of free incentives**
Less salient T&Cs could be overlooked, or misunderstood.

4) **Lack of transparency**
It is not always clear the game being advertised is gambling.

5) **Misleading depictions**
Low-risk product attributes are salient, while risks are often omitted.

6) Deliberative ranking results, ranking the advert features by likelihood of harm. The top ranked will be one of the factors used to inform forthcoming testing.

[1] Systematic errors in decision making resulting from memory, attention (cognitive biases) and/or reasoning based on feelings (emotional biases).

All adverts leveraged behavioural biases in their design. Three groups of features emerged at risk of potentially causing the greatest harm.

Prevalence of biases

See Appendix A for a list of biases assessed and their definitions.

N = Biases	N = Advert
0	0
1	4
2	22
3	42
4	19
5+	13

Types of biases and how they are leveraged by the three categories of potentially harmful features identified

Top 10 most prevalent behavioural biases

Percentage of adverts (%)

- Salience — 89%
- Framing — 53%
- Scarcity — 44%
- Risk aversion/ certainty effects — 34%
- Anchoring — 33%
- Confirmation bias — 19%
- Sentiment — 14%
- Friction costs — 11%
- Illusion of control — 8%
- Social norms — 8%

Source: N=100 Meta ads collected by BIT between August–September 2022
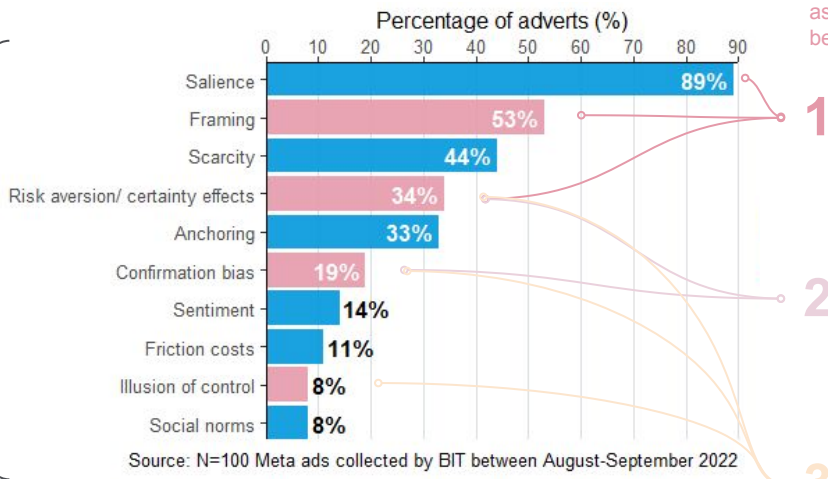
Key: Behavioural bias predicted to <u>less</u> likely mislead and/or prompt harmful gambling; Behavioural bias predicted to <u>more</u> likely mislead and/or prompt harmful gambling

Three groups of features at risk of potentially causing harm

We discuss our findings of potentially harmful features as groups, due to commonalities and/or interactions between different elements.

1 The salience of 'free' and 'T&Cs that do not apply' mean important, less salient T&Cs could be overlooked, or misunderstood. See slide 28.

2 The nature and risks associated with the product being advertised is not clear in the majority of slot game adverts. See slide 29.

3 Depictions of slot games in adverts can be misleading, due to implying control over outcomes, and/or focusing on lower-risk attributes. See slide 30.

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We designed two adverts to exhibit the three groups of (and other) features identified that may result in harm.

Advert 1 at risk of harm
Double-incentive for new customers only

Win made salient (e.g. capitalised text, referring to the outcome concrete language, money emojis).

Implies positive influence on **emotional state**

Referencing attributes to **lower perceived risk** ◆

No explicit in-text **references to gambling** and/or the slot game (applicable throughout advert 1) 🔴

T&C issues (e.g. include a short redemption period; do not specify the wagering requirements' value; and do not stipulate how two incentives can be redeemed in conjunction with one another).

Use of **personal pronouns**, to imply possession

None, or less salient, safer gambling logos

Key- *Feature is part of:*
★: Salience of free incentives
🔴: Lack of transparency
◆: Misleading depictions

We designed two adverts to exhibit the three groups of (and other) features identified that may result in harm.

Advert 2 at risk of harm
In-game offer for all customers

Win made salient (e.g. capitalised text, referring to the outcome concrete language, money emojis).

Implies positive influence on **emotional state**

T&Cs that don't apply are more salient than those that do ★

Referencing attributes to **lower perceived risk** ◆

Overstating **control** for a game of chance ◆

Use of **personal pronouns**, to imply possession

None, or less salient, safer gambling logos

Anchoring to low-probability, high value **outcomes**

Key- *Feature is part of:*
★: Salience of free incentives
◼: Lack of transparency
◆: Misleading depictions

The presence and salience of 'free' and 'T&Cs that do not apply' mean important, less salient T&Cs could be overlooked, or misunderstood.

Adverts tend to highlight a game's more positive features (e.g. incentives, gameplay, rewards and brand graphics). Whilst we understand the need to make games attractive to users, it can be inappropriate when it detracts attention away from important information, such as T&Cs. Two of the potentially most harmful instances of this included:

	Issue identified	What we found	Behavioural rationale
1	*Unclear financial spend requirements when redeeming offers*	Despite being described as 'free', incentives often require the individual to spend a certain amount to redeem an offer, or withdraw winnings (e.g. minimum bet/ deposits, wagering requirements). While minimum deposit or bet T&Cs were often prominently listed (within the caption, subheader and/or banner), wagering requirements were only shown in the footnotes – making them easy to miss.	**Highly salient 'free' incentives and T&Cs that do not apply can increase the likelihood that people take action – in this instance by placing a bet – and ignore other important information.** Individuals tend to prioritise visually prominent elements and use this information disproportionately compared to other available information, when making decisions.[1] When multiple cost-related details are available, emphasising the smallest cost (i.e. 'free') increases the likelihood of purchasing.[2]
2	*T&Cs that do not apply are more salient than those that do*	When present, T&Cs that do not apply (e.g. no deposit / wagering requirement) were more likely to be listed in salient parts of the advert (caption 46%, subheader 21%), while unique T&Cs that still applied were mainly listed in footnotes (38%).	

[1] Jarvenpaa, S. L. (1990). Graphic displays in decision making—the visual salience effect. *Journal of Behavioral Decision Making, 3*(4), 247-262.
[2] Kim, H. M. (2006). The effect of salience on mental accounting: how integration versus segregation of payment influences purchase decisions. *Journal of behavioral decision making, 19*(4), 381-391.
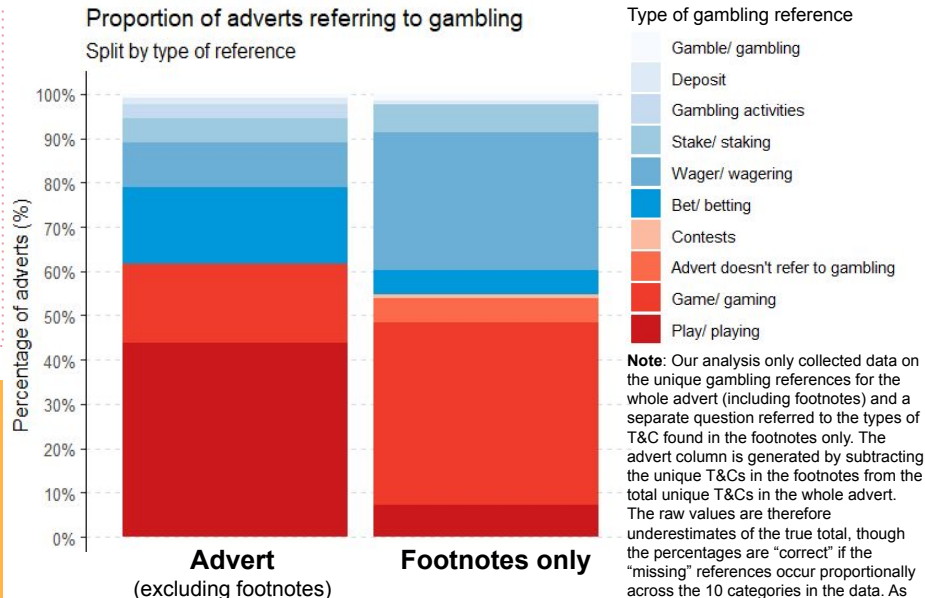
The nature and risks associated with the product being advertised is not clear in the majority of adverts, and none mentioned the game's odds.

The majority of adverts **do not make explicit in-text references to gambling**, and 1 in 2 adverts **do not specify the product is a slot game**. When a slot game was mentioned, **none included the game's odds**.

27% of adverts used generic terms ('play', 'game', 'contest'), and 34% didn't mention gambling. This results in adverts relying on individuals recognising the brand or noticing the 'BeGambleAware' logo to make the gambling connection. Adverts are therefore not prompting individuals to consider the risks associated with gambling. **We also found no adverts included odds information,** which informs someone's perceived chances of winning and likelihood they choose to play.[1] This contrasts with requirements in financial product advertising (e.g. APR).[2] The potential harms arising from the omission of these features may be exacerbated among those new to gambling.

Behavioural rationale

Individuals are generally risk averse;[3] however the lack of transparency in most adverts regarding the risks of gambling, means individuals may fail to fully consider the true costs associated with incentives. Furthermore, risk seeking behaviour can increase among individuals with a gambling problem.[4] Adverts that only portray the positive attributes of gambling (e.g. framing them as thrill-based games) may reinforce false risk beliefs among these groups (leveraging their confirmation bias).


Proportion of adverts referring to gambling
Split by type of reference

Type of gambling reference
- Gamble/ gambling
- Deposit
- Gambling activities
- Stake/ staking
- Wager/ wagering
- Bet/ betting
- Contests
- Advert doesn't refer to gambling
- Game/ gaming
- Play/ playing

Percentage of adverts (%)

Advert (excluding footnotes) | Footnotes only

Source: N=100 Meta ads collected by BIT between August-September 2022

Note: Our analysis only collected data on the unique gambling references for the whole advert (including footnotes) and a separate question referred to the types of T&C found in the footnotes only. The advert column is generated by subtracting the unique T&Cs in the footnotes from the total unique T&Cs in the whole advert. The raw values are therefore underestimates of the true total, though the percentages are "correct" if the "missing" references occur proportionally across the 10 categories in the data. As an example, if "18+" appeared in both the caption and the footnotes, it is not counted in the Advert column.

[1] BIT. (2022). *Comprehension of gambling odds*. [2] ASA & CAP. (n.d.). *The CAP Code: The UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing – 14 Financial Products*; [3] Ring, P., Probst, C. C., Neyse, L., Wolff, S., Kaernbach, C., van Eimeren, T., Camerer, C. F., & Schmidt, U. (2018). It's all about gains: Risk preferences in problem gambling. *Journal of Experimental Psychology: General, 147*(8), 1241–1255. [4] Ligneul, R., Sescousse, G., Barbalat, G., Domenech, P., & Dreher, J. C. (2013). Shifted risk preferences in pathological gambling. *Psychological medicine, 43*(5), 1059-1068.

Depictions of slot games in adverts can be misleading, due to overstating control over outcomes, and/or focusing on lower-risk attributes.
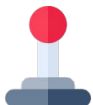
Overstating control for a game of chance

What we found: Several adverts made specific or generic references to the number of ways individuals can win. These cases, along with certain language examples (e.g. "Reach for the Joker's Max prize"), could be interpreted as a greater probability of winning than is true, or implying individuals have control over the outcomes, when in truth they do not.

Behavioural rationale
Individuals tend to overestimate their control over uncontrollable outcomes.[1] This, in combination with adverts providing incomplete information on probabilities (i.e. omitting the number of ways you can lose), may cause individuals to overestimate their winning chances, potentially contributing to harmful gambling.

Adverts sometimes focus on slot game attributes that may lower perceived risk

What we found: Some adverts emphasised certain features that could lower the perceived risk, such as 1) a cash-back offer (e.g. *"10p cashback per £1 spend"*), 2) no wager requirements (e.g. *"There's no wagering, so you'll keep everything you win"*), or 3) guaranteed wins in a prize wheel (e.g. *"You're now guaranteed to win a prize weekly"*). However, these features may be mentioned without the accompanying information outlining potential risks (e.g. gambling references or odds details).

Behavioural rationale
Highlighting incentives with reduced risk and cash back inducements may result in increased engagement with the advert and these offers specifically.[2] This can also divert attention away from important T&Cs, and reduce intent to engage with the information

[1] Yarritu, I., Matute, H., & Vadillo, M. A. (2014). Illusion of control: the role of personal involvement. *Experimental psychology, 61*(1), 38–47.
[2] Lole, L., Russell, A. M., Li, E., Thorne, H., Greer, N., & Hing, N. (2020). Interest in inducements: A psychophysiological study on sports betting advertising. *International Journal of Psychophysiology*, *147*, 100-106.

We asked a small group of advertising experts and our gambling team to prioritise potentially harmful features for testing in forthcoming experiments.

We wanted to identify which **five features** we should prioritise for further testing, to determine whether they result in harmful outcomes.

We asked 10 project team members and 4 external policymakers, to rank a short-list of 18 list of features from most to least harmful.

The ranking (calculated using a Borda count) of each feature is shown on the right (a full ranking of the 18 features and distribution of rankings is in Appendix A). The top represent a view of the five most harmful features present in our data.

Next steps: based on the findings from this study, the forthcoming online randomised control experiment will prioritise testing these top 5 ranked advert features. We will test these features against the 'typical' advert and a good practice advert, to determine whether features influence perceptions and behaviour beyond an advert's expected commercial impact.

Rank	Advert feature or content
1	The caption implies the individual has control over the outcomes (e.g. "Up to 200,704 ways to win")
2	The caption and subheader state wins for an in-game offer are instant and/or guaranteed.
3	The footnotes state there's a wagering requirement (e.g. "Wagering requirements apply"), but it does not specify the high wagering value (e.g. 40x the bonus amount of £50).
4	The T&C that customers must play X rounds before redeeming the incentive is stated on the website, but not in the footnotes
5	The caption implies there is low risk to potential reward (e.g. "#DreamBigPlaySmall", "There's no wagering, so you'll keep everything you win").
6	The caption suggests gambling is mood-boosting (e.g. "Make your downtime epic")
7	The caption plays on socially-desirable behaviours (e.g. "Have you got your 5 a day? See if you can get some mouth-watering winnings").
8	The caption and subheader emphasises a T&C that doesn't apply (e.g. "No deposit/wager needed"), but T&Cs that do apply are only listed in the footnotes.

Section 5: Detailed advert features

Additional descriptive findings of our analysis.

Main findings

A mock-up based on our findings of a potentially **harmful** slot game advert, **depicting how adverts integrated two incentives**
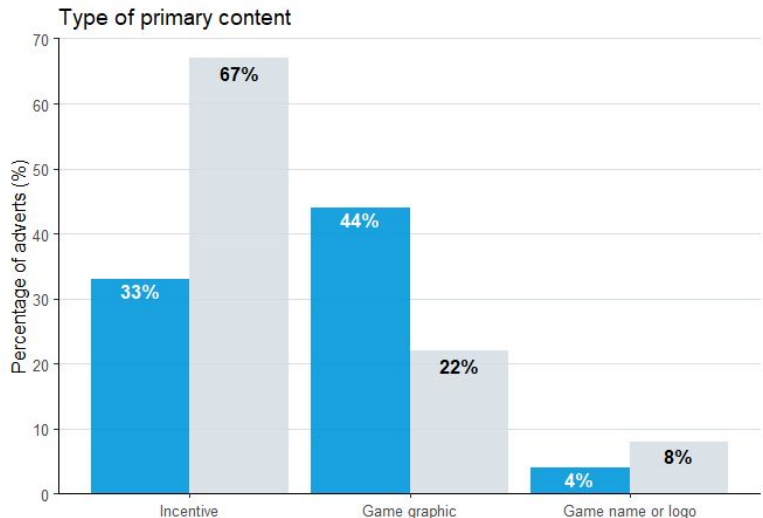
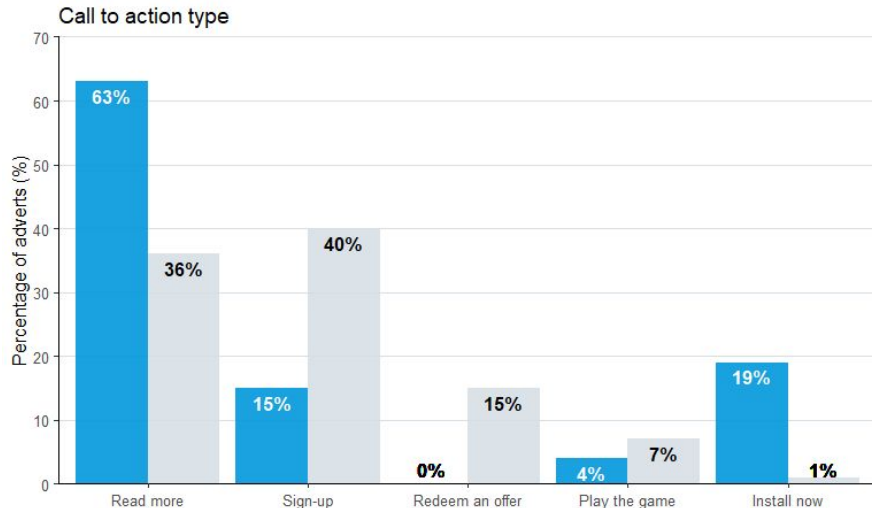NB the mock-ups use a fictional operator (BetGain) and slot game ('Fruit Rush').

1. We analysed two types of advert mediums. Animated (vs. static) adverts were more likely to include game graphics and less likely to include incentives.
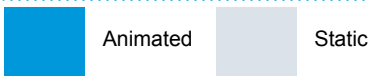
2. New and existing customers were targeted with different types and numbers of incentives. When two incentives were offered, the majority did not stipulate how they could be redeemed in conjunction with one another – as depicted by the advert on the left.

3. Among all types of T&Cs, those related to time limitations were less likely to be mentioned on the advert (vs. the full T&Cs listed on the website).

4. Approximately 1 in 4 adverts displayed a person or character of which most had a joyful expression while engaging with the advertised game.

5. The majority of adverts used in-text strategies such as personal pronouns and emojis, likely to increase appeal.

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We analysed two types of advert mediums. Animated (vs. static) adverts were more likely to include game graphics and less likely to include incentives.

Among the sample of 100 adverts, 27% were animated – had moving elements such as video. In comparison to static adverts, the contents of animated adverts focused on the game, and their call to action was more likely to encourage reading more about a game, or installing the operator's app.

Type of primary content

Percentage of adverts (%)

- Incentive: Animated 33%, Static 67%
- Game graphic: Animated 44%, Static 22%
- Game name or logo: Animated 4%, Static 8%

Source: N=100 Meta ads collected by BIT between August-September 2022

Call to action type

Percentage of adverts (%)

- Read more: Animated 63%, Static 36%
- Sign-up: Animated 15%, Static 40%
- Redeem an offer: Animated 0%, Static 15%
- Play the game: Animated 4%, Static 7%
- Install now: Animated 19%, Static 1%

Source: N=100 Meta ads collected by BIT between August-September 2022

Animated   Static

New and existing customers were targeted with different types and numbers of incentives.

Most multi-incentive adverts offered free spins and bonuses, but only 2 out of 17 these adverts specified how both incentives could be redeemed in conjunction with one another. Adverts with free spins and two incentives were targeted at new customers, whilst prize wheels, tournaments and in-game offers targeted new and existing customers.

Multiple incentives, split by type of incentive and redemption
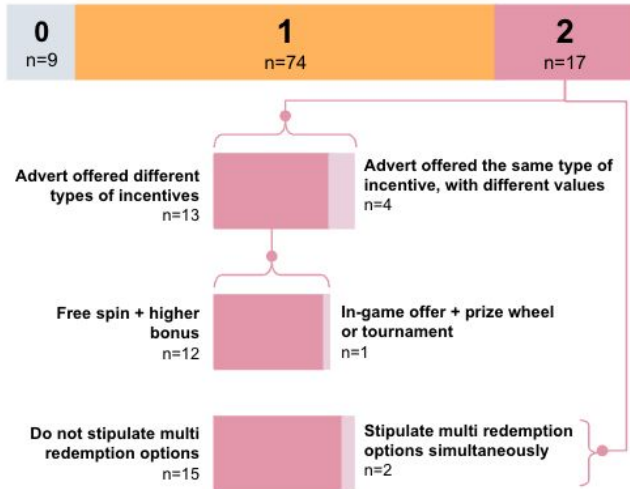
Type of incentives offered in each advert, split by customer type

Source: N=100 Meta ads collected by BIT between August-September 2022
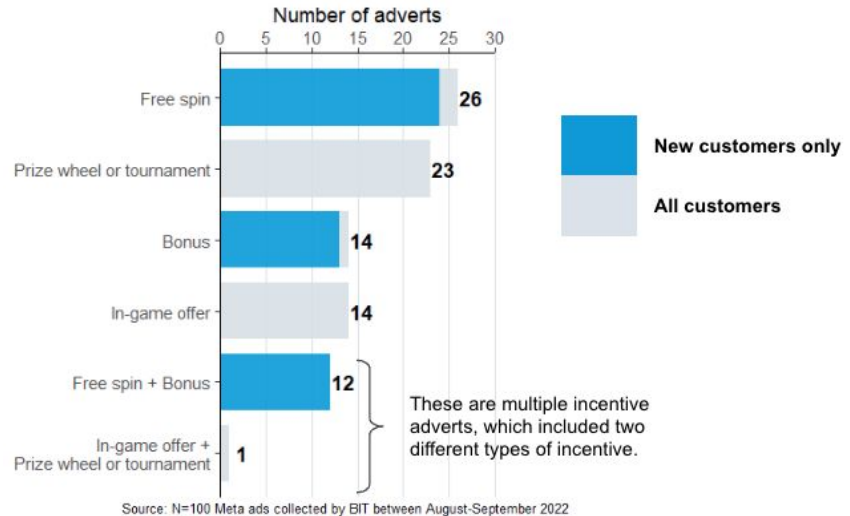
Among all types of T&Cs, those related to time limitations were less likely to be mentioned in the advert (vs. the full T&Cs listed on the website).

For the 22 types of T&Cs recorded, 77% of T&Cs were more likely to appear on the website versus the advert. T&Cs related to incentive scarcity (1. Available for a limited period, 2. Expired after a certain time period once redeemed), were more prevalent on websites T&Cs. The majority of time limitations were for a period of one week or less.

Type of time limitation and where this was listed:

1. Offer is available for a limited time period:

7%	58%
Adverts	Websites

2. Once redeemed offer is only available for a limited period of time:

62%	77%
Adverts	Websites

Proportion of adverts, split by time limitation.
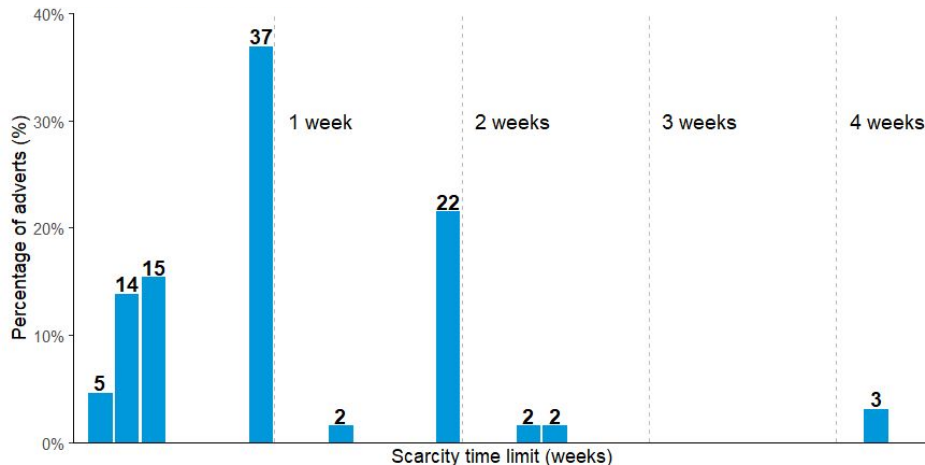
Source: N=65 Meta ads collected by BIT between August-September 2022
This chart captures all incentives with an overall expiry date or limited redemption period after accepting the offer.

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Approximately 1 in 4 adverts displayed a person or character of which most had a joyful expression while engaging with the advertised game.

Around one in four adverts included a person or character of which 14 had a joyful facial expressions and 11 were engaging with the game itself. This may contribute to a framing of gambling as a fun activity, and increase the relatability of the in-game experience with the audience.

Main expression

Joy
14 ads

Surprise
3 ads

Neutral
2 ads

Directed gaze

Game
11 ads

Audience
7 ads

Environment
3 ads
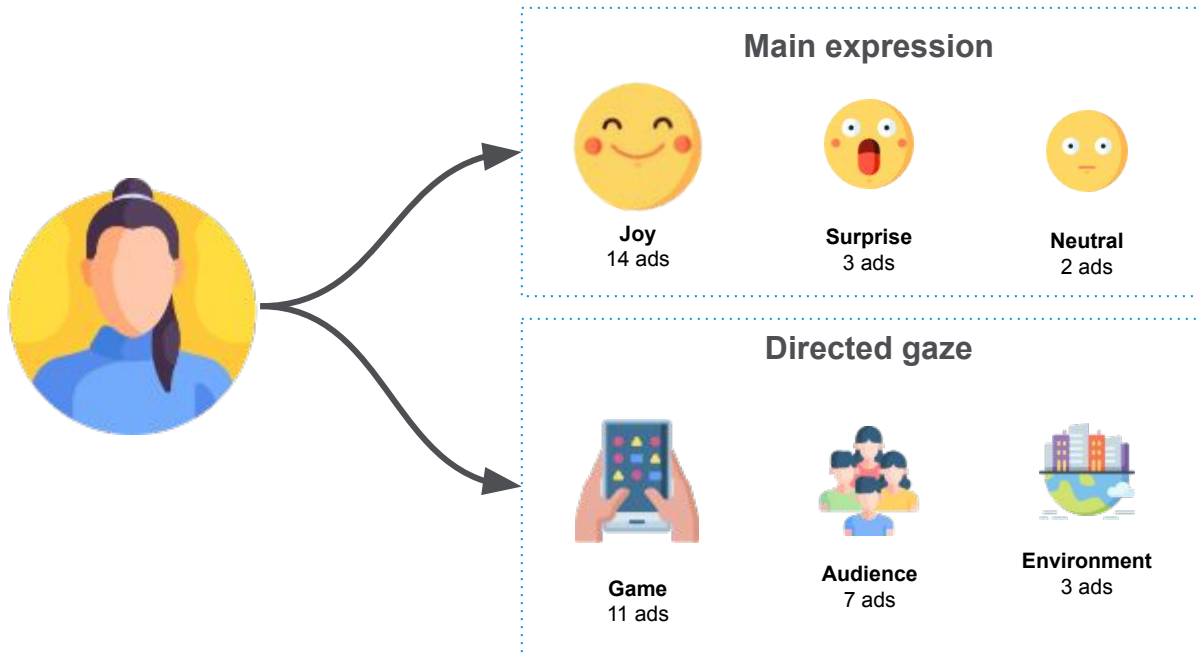
Method:
To determine **gaze direction**, we examined the direction of view of the character with either:
1. The most space on the advert (static adverts)
2. The most screen time (animated adverts)

8

The majority of adverts used in-text strategies such as personal pronouns and emojis.

Personal pronouns were prevalent in adverts and could be used to imply the audience has already redeemed the offer, or allude to the outcomes they could experience during play. Four in five adverts included one or more **emojis**, with the slot emoji being used the most followed by the present, arrow and/or money bag emoji.

67%

*of adverts contained **at least one personal Pronoun** (you, your or our).*

The four most frequently used emojis in advert captions:

Slot game
n=24

Emphasises game type

Present
n=19

Emphasises 'free' nature of incentive
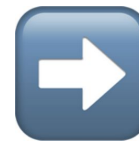
Arrow
n=12

To direct attention towards a call to action

Money bag
n=9

Emphasises potential winnings

Appendix A

References.

Estimating content: online slots ranked second highest for exposure to incentives and active players, but is the highest contributor to financial harm.

Estimated[+] advert content – *what type of online gambling do the adverts feature?*

[+] NB: open access advertising data is limited, so we've used the following data points to: **1) estimate the coverage of different gambling activities in UK advertising**; **2) outline potential (financial) harms, so we focus on a gambling activity that could generate the highest social impact.**

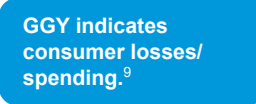| Advert contents proxy / impact of gambling activity	Online betting (real event)	Online betting (virtual event)	Online slots	Online bingo	Online casino (excluding slots)
Exposure to incentives (% who have been sent an incentive for the gambling activity)[1]	**73%** 🥇		**39%** 🥈	37%	30%
(Number of) active players[2] (March 2022)	**~6.4 million** 🥇	232,750	**~3.6 million** 🥈	n/a	~2.1 million (figure for other gaming including casino)
Total number of bets placed[4] (March 2022)	**~323 million** 🥈	~12.8 million	**~6.3 billion** 🥇	n/a	~319 million (figure for other gaming including casino)
Financial harm[5] (average monthly spend per player)	**£45** 🥈	n/a	**£67** 🥇	n/a	£36
Gross gambling yield[7] / % (April 2020 - March 2021)[8]	**~ £2,645 million*** 🥈		**£2,912 million*** 🥇	£189 million*	£1,104 million*

Gambling activity ranking key:

🥇 Highest

🥈 Second highest

> **22% of people say that free bets or money to spend with a gambling company has prompted them to spend money on gambling.**[6]

> **GGY indicates consumer losses/ spending.**[9]

> **Increase of 22.4% from April 2019 - March 2020**

* Here, remote betting includes more than just online betting, e.g. telephone
[1-8] Gambling Commission (2021-22). [9] Natcen. (2022) *Patterns of Play: Extended Executive Summary Report*

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Channel: most (76%) recall seeing gambling adverts on TV. Half recall seeing social media ads. Facebook is the most popular social media platform for interacting with operators.

Advertising channel – *where are gambling adverts seen?*[1]

NB: no open access data was available that split channel by gambling type, so the below data is aggregated.

Frequency* / Channel (channel category)	TV (traditional)	Websites (online)	Social media (online)	Within app games (online)	Video sharing platforms (online)	Newspapers (traditional)	Posters/ billboards (traditional)	Radio (traditional)	Email, text, app push notification (direct)
More than once a week	33%	15%	14%	13%	11%	10%	9%	8%	8%
Once a week	12%	9%	8%	8%	8%	8%	9%	7%	5%
A few times a month	18%	16%	13%	15%	12%	11%	17%	10%	10%
Less frequently than a few times a month	13%	16%	14%	13%	15%	16%	22%	15%	14%
Ever	**76%**	**56%**	**50%**	49%	45%	45%	**56%**	41%	37%

83%* of UK adults use social media and *could* be exposed to a gambling advert via this channel. Our feasibility assessment also found social media platforms are the optimal channel to collect online slot game adverts for this study. The following data outlines which platform(s) we should consider taking advert samples from.

"Do you follow or interact with any gambling companies on any of the following social media or streaming platforms?"*

11% ∞ Meta

6% ∞ Meta

6%

6%
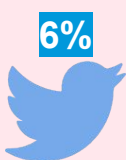
10% of people say that an **advert** or a post by a gambling company on **Facebook** has **prompted them to spend money on gambling** (15% across any social media platform).

We adopted definitions from current advertising regulation and guidelines to identify potentially harmful features in our advert sample.

A harmful feature is any content in an advert that misleads and/or is irresponsible (see definitions below). Based on i) existing evidence, ii) the study's pilot, and iii) feedback from The Committee of Advertising Practice (CAP), we generated a list of harmful features that we predicted may emerge, and created related outcome measures to capture whether they existed and in what capacity.

Issue & Source	Definition	Attributes	Related outcome measures
	Existing advertising regulation and guidelines¹		BIT's predictions
Misleading	An advert that may **deceive** a consumer to take a **transactional decision*** that they would not otherwise have taken.	Deception may occur through: Ambiguity; presentation; omitting important information; including false information.	T&Cs that do not apply (location, type); Advert and website T&Cs contradict; Gambling + slot games references; Reference to an outcome; Appeal to behavioural biases; Presence of sludge.
Harmful gambling	An advert that may encourage **harmful gambling**** gambling, or could lead to financial, broader social*** or emotional **harm**.	An advert may affect how someone gambles, namely the characteristics of their gambling behaviour. Here, an advert's influence is likely to be more indirect.	Reference to an outcome + jackpot; Appeal to behavioural biases; Presence of sludge; Scarcity tactics (time limits).

¹ CAP. (2021). *Gambling advertising: responsibility and problem gambling Advertising Guidance (non-broadcast and broadcast)*.; ASA/CAP. (*n.d.*). Appendix 1 The CPRs and BPRs. *CAP Code*.; ASA. (*n.d.*). 16: Gambling. *The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing*.

*Transactional decision = any decision taken by a consumer, whether it is to act or not act, about whether, how and on what terms to buy, pay in whole or in part for, retain or dispose of a product or whether, how and on what terms to exercise a contractual right in relation to a product.

**Harmful gambling = is any characteristics of gambling that increases the risk of, or result in, an individual experiencing gambling-related harm

***Social harm = in this instance, broader social harms include the impact someone's gambling can have on others (e.g. their relationship quality, and conflict).

We have designed a 3 part methodology: 1) data collection & cleaning; 2) codebook development; 3) coding + mixed-methods analysis.

Codebook development

Explainers

Database feasibility checks to generate desired sample

Data collection on Meta's Ad Library (n=193)

Random sampling (n=176)

Data cleaning & sorting

Define analysis categories

Create coding rules

Pilots 1 + 2 (n=5 per pilot)

= Refined categories, codes & analysis rules

Feasibility checks - Assessing which advert content and channel were most suitable for this study.
Meta's ad library - Collection of adverts posted on Facebook, Instagram, and Messenger.
Pilots 1 & 2 - Allow researchers to practice coding, review the codebook (pilot 1), and use and revise the Google Form used to collect answers (pilot 2).
Reliability checks - Researchers compared answer for a subset of adverts (10-25%) and aimed for an 80% agreement (excluding free-text options). In pilot 1, the checks were used to resolve issues with input options and analysis rules we used.

Coding & analysis

Stage 1 (n=26)

Reliability check

Stage 2 (n=26)

Reliability check

Stage 3 (n=48)

Reliability check

Analysis

The 17 adverts were removed during data cleaning:

- Did not meet our sampling criteria OR
- Are repeated versions of the same advert from the same operator, which do not meet the criteria of being creatively different (i.e. had 2+ distinct features) OR
- Adverts which have been removed from Meta and had no alternative advert exists for it.

Coding stages 1 - 3 = two researchers will code half the sample each using the codebook (input options + analysis rules refined during pilots).

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Types of behavioural biases assessed, categorised by the ABCD framework: part 1.

- *Attention = is scarce, easily distracted, quickly overwhelmed and subject to switching costs.*
  - **Salience**: we notice what stands out more, or that are relevant to them (e.g. the Ad is personalised; has a unique design; use of colour/ bold fonts to draw attention to specific parts of the Ad)
  - **Sentiment**: appealing to someone's mood/ feelings (e.g. the Ad uses emotive language; the people/ characters expression resonates with the audience; frames the Ad as 'mood boosting')

- *Belief formation = is how we sense of the world, given limitations to memory, attention, information and processing power.*
  - **Social norms**: we use the behaviours and opinions of others to shape our own (e.g. the Ad cites how many people have won; includes a testimonial from a past player; includes the number of people that play; described the game as popular)
  - **Messenger effects**: weight given to information depending on who is communicating to them (e.g. the Ad includes a celebrity; the Ad includes characters/ a theme to conveys the Ad's message in a certain way)
  - **Confirmation bias**: is the tendency to search for, interpret, favor, and recall information in a way that confirms or supports one's prior beliefs or values (e.g. the Ad references previous positive gambling experiences/ wins)
  - **The Gambler's Fallacy**: the erroneous belief that a random event is less or more likely to happen based on the results from a previous event (e.g. the Ad displays gameplay that shows a series of losses, followed by a win, and implies the events are connected; the Ad mentions or shows things like lucky streaks)
  - **Illusion of control**: our tendency to overestimate our ability to control events (e.g. the Ad implies the player has control over the slot games outcomes; the Ad implies redeeming the promotion will change the probability of a win)
  - **Scarcity**: we place higher value on things that are limited (e.g. the game or promotion is only available for a limited time; only a limited number of incentives are available)

Types of behavioural biases assessed, categorised by the ABCD framework: part 2.

- *Choices = are shaped by environments, including contextual cues, the arrangement and framing of options, as well as preferences and incentives. The deliberate manipulation of these is what is know as "choice architecture".*
  - **Framing**: how information is presented can influence how it is interpreted (e.g. the headline is deliberately worded to increase the perceived likelihood of winning; the use of personal pronouns to imply ownership prior to redemption; places weight on the loss incurred from not playing or redeeming the offer – loss aversion)
  - **Anchoring**: we tend to use arbitrary reference points to evaluate other options i.e. the first option, information, or value shown to us (e.g. the Ad shows the jackpot prize, or another value of a win)

- *Determination = motivation/ willpower is a limited resource that may easily be depleted. It can also require competencies to exert.*
  - **Friction costs**: we typically want to take the path of least resistance. When effort is required, we weigh up whether it is worth exerting ourselves for the expected benefit (e.g. the Ad implies redeeming the promotion, or withdrawing winnings, is easy)
  - **Commitments & consistency**: we are more likely to be motivated to do something we have previously committed ourselves to, or act in a way that is consistent with our past behaviour (e.g. the Ad refers to how they presume the audience has behaved in the past)
  - **Risk aversion/ certainty effects**: we don't like uncertainty and generally stick to what we know vs. we crave clarity over chance and make costly sacrifices to get it (e.g. the Ad refers to guaranteed/ certain outcomes, or mentions the game is free to play)

# Full shortlist of the 18 features identified and their average harm rankings.

Rank	Average ranking	Advert feature or content
1	4.9	The caption implies the individual has control over the outcomes (e.g. "Up to 200,704 ways to win")
2	6.3	The caption and subheader state wins for an in-game offer are instant and/or guaranteed.
3	6.4	The footnotes state there's a wagering requirement (e.g. "Wagering requirements apply"), but it does not specify the high wagering value (e.g. 40x the bonus amount of £50).
4	6.5	The T&C that customers must play X rounds before redeeming the incentive is stated on the website, but not in the footnotes
5	7.2	The caption implies there is low risk to potential reward (e.g. "#DreamBigPlaySmall", "There's no wagering, so you'll keep everything you win").
6	7.4	The caption suggests gambling is mood-boosting (e.g. "Make your downtime epic")
7	8.2	The caption plays on socially-desirable behaviours (e.g. "Have you got your 5 a day? See if you can get some mouth-watering winnings").
8	9.1	The caption and subheader emphasises a T&C that doesn't apply (e.g. "No deposit/wager needed"), but T&Cs that do apply are only listed in the footnotes.
9	9.2	The advert's graphic of the game includes a large multiplier without specifying the real/monetary value (e.g. "10,000x").

Rank	Average ranking	Advert feature or content
10	10.1	The advert is offering two incentives, but the advert T&Cs don't stipulate how they can be redeemed in conjunction with one another (i.e. redeem simultaneously in the same game or separately in different games/ at different times)
11	10.4	The advert does not explicitly refer to gambling (e.g. it doesn't state gambling/stake/bet/wager in any of the advert's text). The only inexplicit reference is a small "BeGambleAware" logo.
12	10.4	The caption says there are multiple prizes and multiple ways to win (e.g. "more ways to more wins")
13	10.6	The advert is offering two incentives. In the footnote T&Cs, it says they need to be redeemed at different times (e.g. "20 free spins in first 30 mins, final 80 spins 72 hours later").
14	11.1	The incentive's T&Cs only appear in the advert's footnotes
15	11.6	The subheader states the jackpot's value e.g. "Win up to £50,000".
16	13.4	A T&C in the footnote refers to a time limit in hours, rather than days (e.g. \"Offer expires 72 hours after redemption\").
17	13.9	The caption and headline use personal pronouns (e.g. \"Get your 100 Free Spins\").
18	14.4	The subheader makes reference to a jackpot, without specifying a value e.g. \"With a chance to land the jackpot\"

The distribution of harmful rankings for each of the 18 features shortlisted.
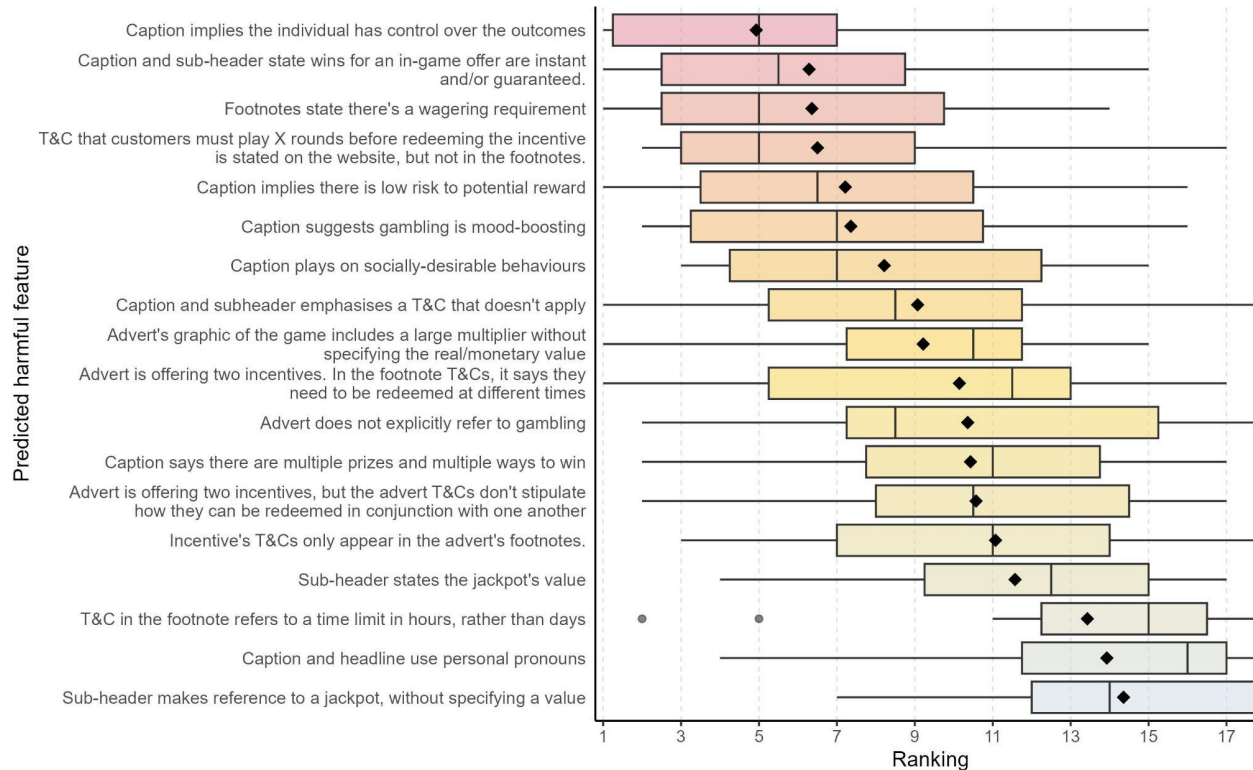
This chart shows boxplots of the rankings given. Borda count methods sort features on average rank if everyone gives a full ranking.

Key:
◆ = the mean ranking for each feature voted on.
| = the median ranking for each feature voted on.
● = indicates 2 outliers calculated using the "1.5 rule"

Edge of the box = 25th and 75th percentile of rankings
Ends of the box lines = "minimum" and "maximum" after excluding "outliers"

Source: N=14 full rankings on 18 topics collected by BIT in January 2023.

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Appendix B

Data outputs.
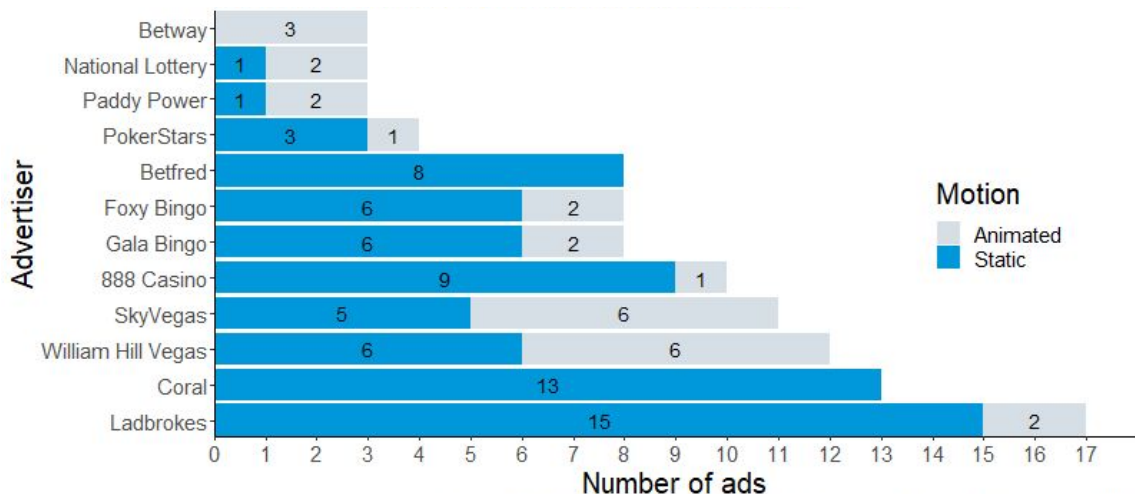
Sample split by motion, operators and date.

Sample composition by operator and motion in adverts

Source: N=100 Meta ads collected by BIT between August-September 2022

Our sample's date of posting

Month posted	Count
May	1
April	0
May	1
June	5
July	14
August	7
September	72

Note: Adverts that aren't active on Meta are typically deleted. We collected all unique slot adverts that met our criteria between August and September 2022.

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Read more and sign-up are the most common calls to action.

Call to action type across the whole sample

Call to action type
- Read more — 43%
- Sign-up — 33%
- Redeem an offer — 11%
- Play the game — 6%
- Install now — 6%
- No call to action — 1%

Source: N=100 Meta ads collected by BIT between August-September 2022

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The average number of free spins offered was 125, which reduced to 60 when offered with a bonus. The average bonus value was ~£38.

	Bonus only	Spins only	Both bonus (£) and spins
Number	14	25	12
Average incentive	£37.86	125	£39, 60
Median incentive	£50	100	£50, 35

The footnotes were almost exclusively used for incentive qualifications. The caption and banner were the busiest parts of the advert.

% feature type	Caption	Headline	Subheader	Main body	Footnotes	Banner
Number of Adverts with text in this feature	**94**	**90**	**79**	**29**	**86**	**97**
Average number of unique types	**2.1**	**0.9**	**1.0**	**1.0**	**1.1**	**3.2**
Incentive available	70%	78%	29%	21%	0%	53%
Call to action	28%	3%	9%	17%	0%	98%
Incentive qualifications	0%	1%	51%	28%	99%	0%
Website URL	2%	0%	0%	0%	0%	96%
Incentive details	48%	0%	0%	0%	0%	32%
Game name	33%	0%	0%	0%	0%	18%
Safer gambling message	7%	0%	0%	0%	10%	8%
Game-related	0%	7%	14%	17%	0%	0%
General incentive	6%	0%	0%	0%	0%	8%
Game description	9%	0%	0%	0%	0%	6%
Slogan	1%	1%	1%	7%	0%	0%
Brand name	0%	0%	0%	0%	0%	2%
Outcomes	2%	0%	0%	0%	0%	0%

Source: N=100 Meta ads collected by BIT between August-September 2022

Qualifications of incentives were disproportionately stored in places attracting less attention in slot advertisements.

| % qualifications are present	Caption	Advert (inc. footnotes)	Banner	Webpage
Number of adverts with qualifications present	100	100	100	77*
Average number of qualifications	1.24	6.24	1.09	8.48
No qualifications present	45%	10%	57%	3%
18+	37%	75%	38%	81%
T&Cs apply	31%	80%	32%	86%
Offer expires a certain period after redemption	0%	62%	**0%**	77%
Valid for selected games	3%	60%	4%	69%
New customers only	8%	50%	11%	60%
Minimum bet required	24%	34%	12%	39%
Deposit required	16%	35%	1%	48%
Fixed value of incentive	0%	37%	1%	61%
Wagering requirement	0%	37%	4%	51%
Offer must be accepted within a set timeframe	0%	36%	0%	47%
Opt-in required	2%	23%	1%	34%
Offer available for a limited period	2%	5%	0%	58%
Capped redeemable amount	0%	24%	4%	29%
Reserve the right to change or discontinue…	0%	0%	0%	56%

Source: N=100 Meta ads collected by BIT between August-September 2022

*The website column contains 77 adverts due to not having available website data for all adverts sampled.

Most types of T&Cs (77%) were more likely to appear on the website than the advert.

Source: N=100 Meta ads collected by BIT between August-September 2022
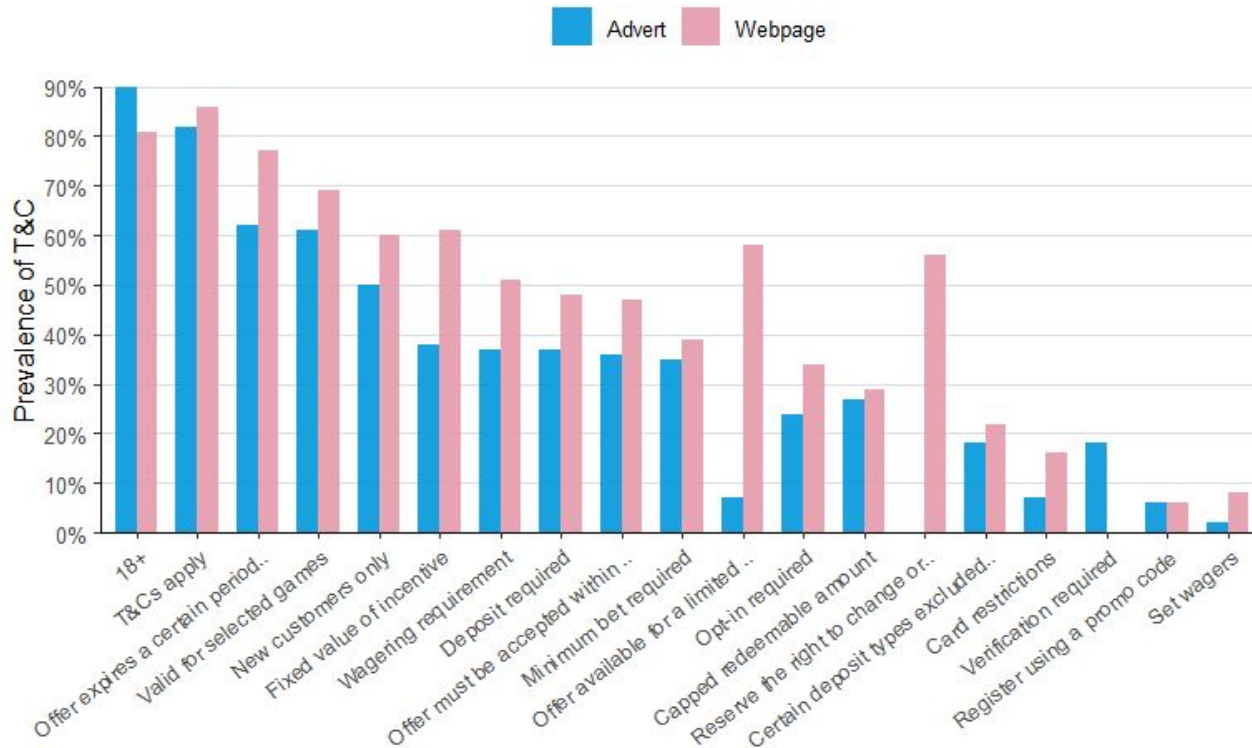
Formatting typically increased the salience of headlines and third-party logos, and aided the legibility of footnotes.

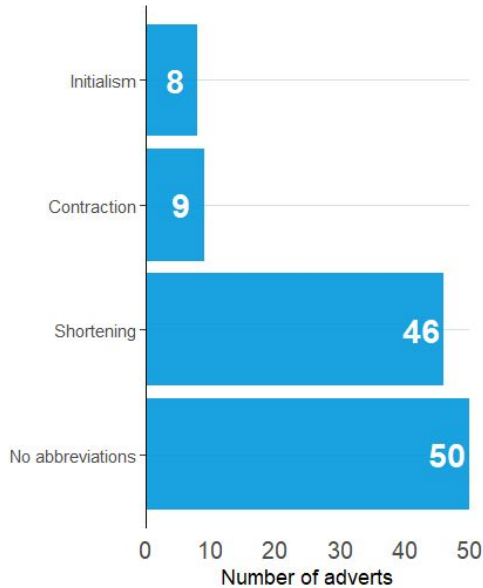**Formatting across the whole sample**

	Footnotes	Headline	Third-party logos
Number of Adverts with text in this feature	**86**	**90**	**83**
Capitalised		94%	0%
Bold		87%	2%
Background contrast		85%	96%
Lighting effects		17%	0%
Boxed		16%	82%
3D		10%	0%
Block colour (similar to ad)	37%		
No block colour (text colour contrasts Advert background)	37%		
Block colour (contrasts ad)	23%		
No block colour (text colour does not contrast Advert background)	2%		
No formatting	0%	0%	4%

Source: N=100 Meta ads collected by BIT between August-September 2022

Within footnotes, half of the adverts contained at least one abbreviated T&C, which was often a shortened version of a word.

Types of T&C abbreviation
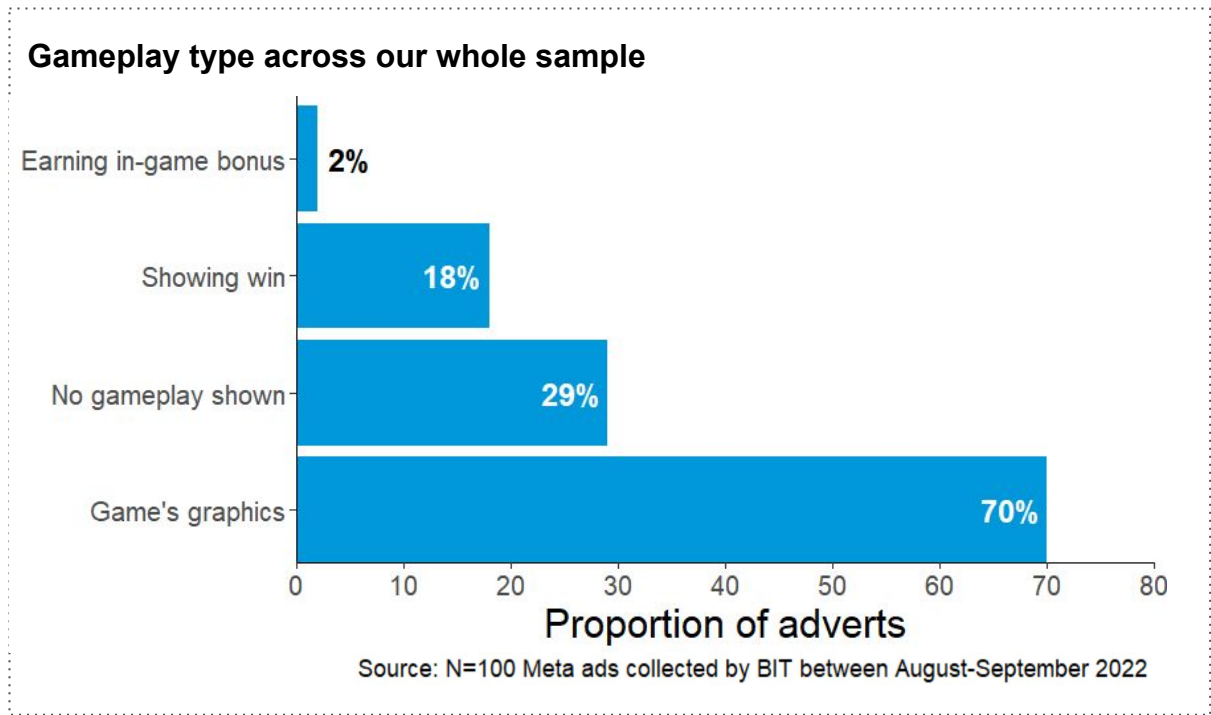

	Number of adverts
Initialism	8
Contraction	9
Shortening	46
No abbreviations	50

Source: N=100 Meta ads collected by BIT between August-September 2022

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Including game graphics was the most common way adverts integrated gameplay.

Gameplay type across our whole sample

Source: N=100 Meta ads collected by BIT between August-September 2022

Most adverts didn't contain people or characters, but when they did, they were typically male, joyful, and looking at the advert's audience.

23% of Adverts have at least one person/character.

Unsurprisingly, the vast majority of people/characters in these Adverts have a happy expression. Most are looking at the audience.

Adverts with only male characters always have everyone fully dressed. Some Adverts featuring female characters have at least one character not fully dressed.

| Number of Adverts	Are all characters fully dressed?	
	Yes	**No**
Male	13	0
Female	2	2
Male and female	3	2

Note: For 1 of the 23 Adverts with at least one person/character, the character's expression/direction of gaze/sex/clothing was unclear, so N=22.

Main facial expression of characters in advert
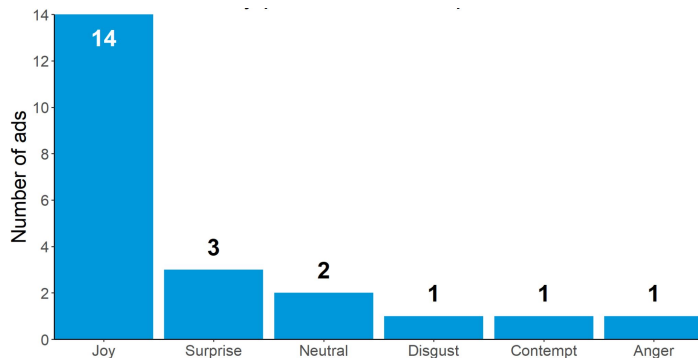
Source: N=23 Meta ads collected by BIT between August-September 2022

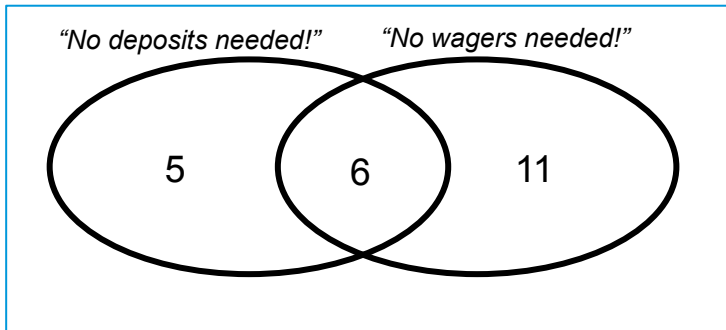### Primary directed gaze of characters in adverts
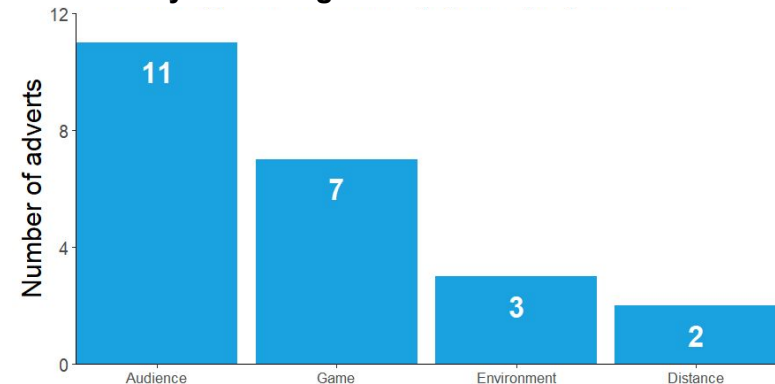
Source: N=23 Meta ads collected by BIT between August-September 2022
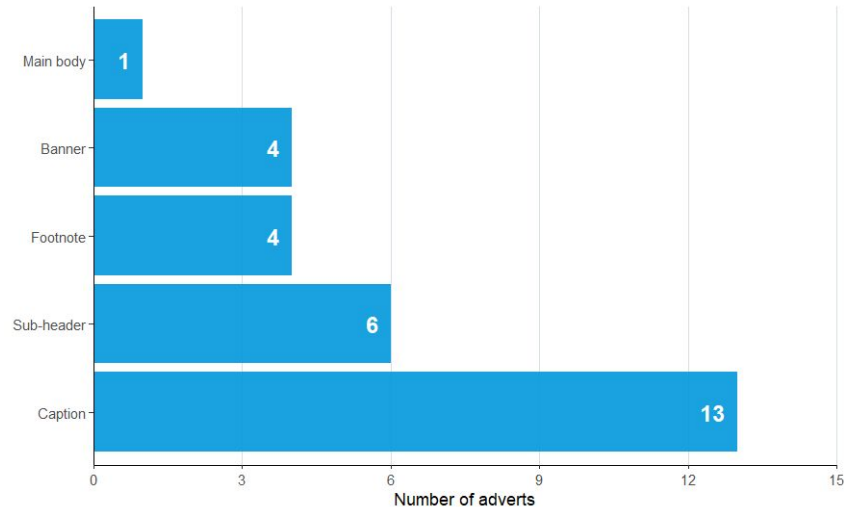
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The majority of adverts that mentioned a T&C does not apply, stated "No wagers needed" in the caption.

Some adverts (n=22) mentioned that a specific T&C did not apply, which often stated "no wagers needed" in the caption. All of these adverts were targeted at new customers. The majority of these adverts (n=17) made one reference to the T&C that did not apply, while some made two (n=4) or three (n=1) references.

Type of do not apply T&C mentioned

"No deposits needed!"   *"No wagers needed!"*

5   6   11

Location of the do not apply T&C mentioned

Location	Number of adverts
Main body	1
Banner	4
Footnote	4
Sub-header	6
Caption	13

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