Biddable Youth

Sports and esports Gambling Advertising on Twitter: Appeal to Children, Young & Vulnerable People

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Executive Summary

The scale and character of Twitter-based gambling advertising activity revealed in this report raises important questions for regulators, social media companies and the gambling industry. It shows that children and vulnerable groups are active in conversations around gambling, regularly consuming and sharing highly visual advertising. It shows new types of content arising, particularly around betting on esports, which are likely to be more appealing to children and young people, and which make almost no reference to the risks associated with gambling.

In order to tackle these problems, existing regulations around access to gambling advertising need to be clarified and enforced. Where technical tools have been developed to restrict content based on age, these should be reviewed and applied; not only to the largest operators, but also to the less visible network of affiliates and tipsters sharing often huge quantities of content online.

Further, the proliferation of promotions likely to appeal to vulnerable groups - particularly involving 'free' and 'matched' betting - needs to be urgently examined, and the effects of this messaging on people's gambling behaviour understood.

Beyond this, the promotion of money motives for gambling as well as encouragement to make gambling a regular habit needs to be addressed. Two areas that require immediate attention are the use of under 25s in esports advertising and the clarification of the subjective "particular appeal to children" regulation in the context of the young demographic of the esports audience.

To achieve this, it is vital that regulators ensure that they are able to measure and understand the developing landscape of online discussion, and respond to new forms of gambling. Otherwise, damaging content, and its impact on children and vulnerable groups, is likely to remain prevalent but undetected - hidden in plain sight.

Background

The first two decades of the new millennium have been typified by the need to adapt to new forms of social technology. Once niche online platforms have become ubiquitous, and an understanding of how to navigate novel public spaces on social media has become key to those who want to run a business, maintain a social circle or, indeed, govern a country.

The gambling industry has been particularly quick to move into these spaces. Research conducted by Demos in 2016 into gambling activity on Twitter found a broad and well-connected ecosystem existing between companies, affiliates and their customers, with gambling accounts sharing high volumes of promotional and conversational messages[1]. While gambling advertisements on social media are subject to the same stringent regulations as those shared offline, the scale and complexity of these platforms has made it difficult to study this advertising at scale. This gap in our knowledge is especially acute when it comes to the experiences of children online, and with regards to emerging and lucrative new fields of gambling, including bets placed on the outcomes of video games, or using cryptocurrencies. This report aims to fill some of these gaps.

In March 2018, GambleAware commissioned two consortia to work on a large scale research project to assess the extent, nature and impact of gambling advertising on children (defined in accordance with the ASA as those under the age of 16[2]), young people and vulnerable groups in the UK. The two consortia were 1) Ipsos MORI consortium, working in partnership with the University of Bristol, Demos, University of Edinburgh and Ebiquity and 2) the Institute for Social

Marketing (ISM) consortium, working in partnership with ScotCen, Professor Gerda Reith and Dr Philip Newall.

The key aims of the research were:

• To explore whether and how gambling marketing and advertising influences children and young people's attitudes towards gambling.

• To examine the tone and content of gambling marketing and advertising across all media, including social media and explore the potential impact of these on children, young people and vulnerable people.

• To identify specific themes and features of gambling advertising to which children, young people and vulnerable people are particularly susceptible.

This report forms part of this larger project, and takes a detailed view of the volume, frequency and nature of gambling advertising on Twitter, as well as measuring the extent to which this advertising is consumed and reacted to by children. We also provide an in-depth analysis of the tone, format and content of the visual element of gambling-related advertising on Twitter, including an assessment of the likelihood of content appealing to children, young people and vulnerable groups. A synthesis report of the full project, which includes this research alongside studies into sports sponsorship, advertising on websites and qualitative research with children, young and vulnerable people, amongst other strands, will be published in Summer 2019.

Introduction

The betting ecosystem on Twitter is vast, diverse and highly active. Advertising produced at a steady rate by bookmakers with familiar names such as Paddy Power or Ladbrokes is added to and amplified by content from affiliates, who earn commission from signing people up to gambling promotions, and advice from 'tipsters' – who offer advice on how and when to bet on a range of sports, often through a subscription service. Much of this churning mass of activity involves enticing people to place a bet, something only those over the age of 18 can do legally – but the public and sharable nature of social media makes it hard to predict who is viewing and responding to advertisements; a prediction made more difficult given a relative dearth of research on this issue. Despite the highly public nature of Twitter, much of the gambling ecosystem is conducting its business under cover of darkness.

This report, prepared by the Centre for the Analysis of Social Media (CASM) at Demos and School of Management, University of Bristol, aims to shed some light on this world. Below, we present both a computer aided analysis driven by machine learning and a detailed manual content analysis of hundreds of thousands of Tweets sent by betting accounts, as well as examining the ways in which this content may be viewed and shared by children.

Computer Aided Analysis

Machine learning, in brief, involves training a computer to make decisions on large datasets – often making distinctions within data which you would traditionally need a human to provide. These techniques were used by CASM to analyse 888,000 Tweets sent from betting-related accounts on Twitter. In this analysis we discuss, for example, the prevalence of messages offering 'free bets', and the inclusion in advertising of age restrictions, terms and conditions and warnings about responsible gambling. We study Tweets concerning esports, involving bets placed on video games, and uncover striking differences between the conversation around traditional betting and this newly emerging field. We also investigate the audience consuming and responding to gambling content, measuring for the first time the percentage of that audience which is likely to be composed of children, and the ways in which these children interact with messaging. Finally, we explore other types of vulnerability, examining as a case study a group of accounts likely to belong to people experiencing financial issues.

Manual Analysis

In the manual content analysis of a sample of around 800 Tweets containing visual imagery, University of Bristol code, analyse and compare the tactics and techniques used in two very different types of marketing communications: 1) those that aim to elicit a short term (often immediate) tangible response such as opening an account or placing a bet and 2) brand building advertising (known in the context of social media as "content marketing") whose purpose is to build a long-term emotional relationship between the gambler and the bookmaker, affiliate or tipster and to encourage widespread sharing. We explore the age and gender of people and characters featured in Tweets, the types of visual imagery used, the emotions evoked to promote engagement and sharing and the extent to which the content might be considered appealing to children, young people and the vulnerable. This will include an assessment of whether advertising codes including those around "particular appeal to children" appear to be adhered to on Twitter.

During our analysis we identified two specific types of gambling ecosystem:

1. prolific accounts largely related to traditional sports such as football or racing run by large bookmakers such as Coral or William Hill and their affiliates as well as the accompanying 'tipster' accounts advising people where to place their next bet.

2. the growing community focused on esports - placing bets on the outcome of multiplayer video gaming competitions run for spectators often in large arenas.

In order to distinguish between these two forms of activity, we will refer below to conversation around 'traditional' gambling as meaning bets placed on real-world, primarily sporting events, such as football matches and horse races, and 'esports' gambling, which refers to bets concerning the competitive playing of video games.

Notes on interpretation

It is important to note that while this research uncovers a large amount of activity around the advertising and marketing of gambling, this represents only a portion of social media content, and that exposure to this content will not be universal. Twitter is regularly used by millions of people in the UK, but the platform is not representative of the UK population[3]. Twitter users are disproportionately male, and predominantly young – though there are more elderly users on the platform than is often estimated[4]. As of mid-2018, around a fifth of UK adults had accessed Twitter within the last three months (21%).[5] To enable a more general perspective, the findings from this report will be cross-referenced with the self-reported levels of exposure to social media advertising and marketing cited by children, young people and vulnerable groups within the other qualitative and quantitative strands of this overall research project as outlined above and published separately.

Furthermore, it should be noted that this research does not encompass the entirety of gambling activity on Twitter. While we have taken extensive steps to ensure that the majority of prominent voices along with a breadth of different types of betting are represented in this report, our sample is extensive but not exhaustive. In this report, we have also focussed on accounts which promote the placing of bets, allowing us to analyse this activity in detail – this research does not analyse advertising shared by online casinos, for example, lotteries or bingo operators.

Below, we employ a number of machine-learning algorithms built specifically for this research. These are used to decide, for example, whether a given Tweet is relevant to gambling, or roughly how old a Twitter user is likely to be. Classification of this type is an inherently probabilistic process, and none of these algorithms are 100% accurate - the average accuracy for classifiers trained for this report is around 80%. Full details on how these algorithms were trained, and the accuracy of each, will be published in a full methodological report, and is available from the authors.

The manual content analysis of the sample of Twitter advertising visuals uses a mixed-method quantitative and qualitative approach. In order to facilitate comparability across the research strands in this project, the adverts designed to elicit a short term action are classified using the same code book as used in the content analysis of traditional media (e.g. TV, outdoor, door drop etc.) which is reported elsewhere. This quantitative code book is supplemented with qualitative analysis designed to give contextual and illustrative insights. The manual analysis of the brand building, engagement advertising (content marketing) uses a slightly different code book that also captures the emotions used to drive engagement with and sharing of the content.
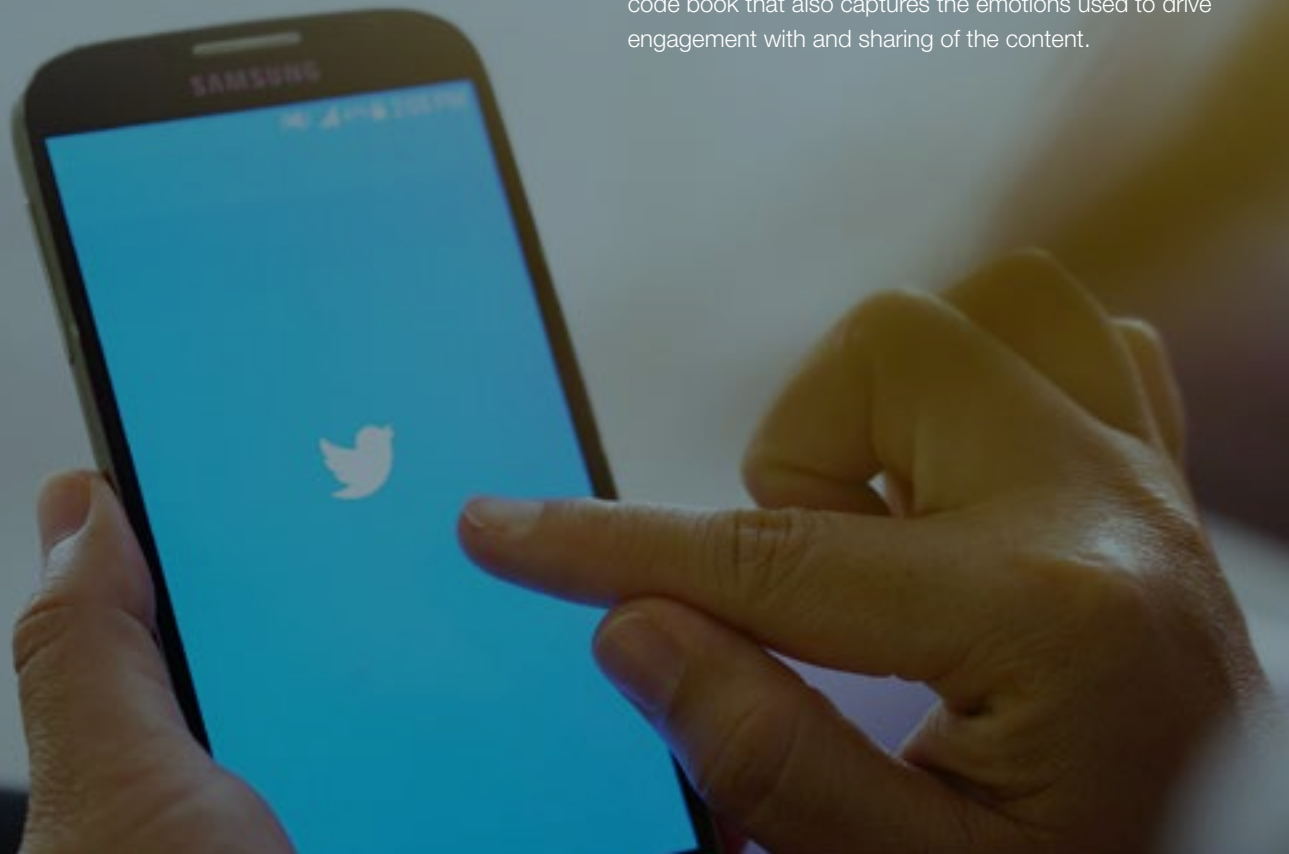
Key Findings

1. **Tens of thousands of children in the UK follow and engage with betting accounts on Twitter:** We found that 41,000 UK followers of gambling related accounts are likely to be under the age of 16, and that children make up 6% of followers of traditional gambling accounts - this rises to 17% of accounts focused on esports gambling. We also found 13,000 replies to and Retweets of gambling content sent from accounts belonging to children in the UK.

2. **28% of those responding to esports Tweets in the UK are children:** Alongside gambling on traditional sports like football, we examined Tweets encouraging the placing of bets on esports - multiplayer video games played competitively for spectators, typically by professional gamers; which often involve the use of cryptocurrencies. We found that 28% of UK users responding to esports content are likely to be children - a figure which rises to almost half (45%) worldwide. Furthermore, only 0.1% of this content contained a warning about the minimum age for gambling, gambling responsibility or the application of terms and conditions. In addition to being attractive to children and young people, esports related content also sees the worst advertising practice in terms of poor labelling of warnings and apparent flouting of regulations.

3. **Betting advertising is widely shared on Twitter:** Over nine months in 2018, 888,000 Tweets were sent from Twitter accounts known to be related to betting, reaching 4.8 million users (700,000 in UK). Bookmakers and their affiliates sent an average of 14 Tweets per day.

4. **Advertising of free bets is prevalent on Twitter:** Half of Tweets from gambling accounts related to 'free' or 'matched' bets, which understate the risks of betting and are complex for the young and vulnerable to understand. These 'free bet' messages were often highly visually appealing, with 90% containing images, video or an animation, and 96% containing a link to an external site.

5. **Very little Twitter gambling advertising mentions age restriction, responsible gambling, or terms and conditions within the text of the post:** Only 7% of Tweets sent from a gambling account on Twitter include some kind of warning within the text of the Tweet, with a mere 4% advising users to gamble responsibly and 1.2% containing terms of engagement. Whilst 69% of Tweets from traditional sports accounts contain these warnings in images or videos only 2% of esports did so. Furthermore, tools developed by Twitter which allow operators to age-restrict their content are either unavailable to or not used by many of the most prolific accounts in this dataset.

6. **Tweets are seldom labelled as advertising.** CAP Code 2.1 states that," marketing communications must be obviously identifiable as such." However, no such overt labelling was found. With no labelling, it is not clear to us that children or vulnerable young people could identify that the Tweets are designed to elicit a behaviour that profits a third party.

7. **The majority of the Tweets raise some regulatory concern.** 68% of traditional sports and 74% of esports Tweets appear to contravene regulations in some way for example by presenting gambling as an income source, or by encouraging gambling as a regular activity or at unsociable times.

8. **Much Twitter gambling advertising is "content marketing" designed to build brand awareness and encourage sharing.** Whilst some Twitter gambling advertising is designed to elicit immediate betting a great deal is designed with a longer term goal of building brand awareness and affinity through engaging content likely to be shared. The most common tactics used are humour, surprise admiration and the presentation of images, facts and stories that make people feel like insiders or niche experts.

Recommendations

For technology companies

Existing age verification tools should be available to all advertisers. Platforms should ensure that technology developed to exclude young and vulnerable users are widely available. As an example, Twitter presently shares their tool, for free, with 'a select number of advertising partners'. This should be expanded to all who want to use it, with regulators able to recommend accounts. Furthermore, gambling advertisers should be obliged to use these tools.

Platforms should work with advertisers to make embedding Ts&Cs in messaging seamless. As a precondition for promoting advertising on platforms, advertisers should be asked to provide a link to terms for that promotion, which could be embedded in the message without affecting character limits.

A free, searchable database of gambling advertising on platforms should be made available. This resource could be maintained by platforms, and function in a similar way to existing libraries for political advertising. This database could be made available to regulators to ensure compliance.

For industry and advertisers

Integrate more explicit and frequent references to risk, age restrictions and responsible gambling within advertising content. These references were almost absent in Twitter gambling adverts.

For regulators

Ensure that existing regulation and codes of practice are applied to the licensed esports betting market as it develops Where esports betting operators are licensed within Great Britain, care must be taken to ensure that existing regulations and best practices are followed, especially concerning the use of child-friendly images and inclusion of individuals under 25.

Maintain careful oversight over unlicensed operators online The unlicensed remote esports betting market requires close scrutiny to ensure that it is not contravening British law by allowing consumers in Great Britain to access its gambling facilities. This is particularly important as the research found evidence of children being exposed to, and interacting with, Twitter accounts advertising unlicensed esports betting. The regulator should maintain a robust approach in deterring and combating unlawful gambling activities.

Identify both poor compliance to existing regulations and guidelines and potential need for new regulations or guidelines. This could include inclusion of individuals under 25, recognition and labelling of ads on social media, and potential for financial incentives to exploit susceptibility or lack of understanding.

Consider whether 'particular appeal' is a useful distinction for deciding whether content is likely to be appealing to children, young people and vulnerable adults. This could consider the extent to which features of wide appeal may also be attractive to children, young people and vulnerable adults, and how best to accommodate this.

Consider the potential role and value of education initiatives. This could include education initiatives for both parents and young people, and could consider both the risks of gambling and promote a better understanding of betting risks, odds and promotions.

Chapter 1. Surveying the field

A computer-aided overview of gambling advertising on Twitter – volume, frequency, nature and audience.

The gambling ecosystem online is huge, noisy and diverse. On Twitter alone, tens of thousands of messages are sent every day, using a range of approaches to convince people to lay a bet, or entice them to set up an account. This promotional activity is regulated by a number of UK bodies, including the Gambling Commission, the Committees of Advertising Practice (CAP) and the Advertising Standards Authority (ASA). However, the scale and nature of advertising on social media presents a major challenge to enforcing these standards. In this chapter, we use machine-learning technology to examine an exhaustive collection of betting content sent on Twitter, in an effort to shed some light on the tactics being used.

Brief Methodology

This section sketches the methodology used to produce our findings. A full and detailed methodological summary is available in a separate report.

Data Collection

CASM researchers first created a list of 417 accounts related to traditional and esports betting, and collected the following data relating to these accounts:

1. **888,745** Tweets sent by 417 gambling related accounts over a nine month period, between 1st March and 1st November 2018

2. **6,381,870** Tweets mentioning these gambling accounts, sent by 1,998,097 users, during the same period

3. Details on the public profiles of **4,824,654** unique followers following one of more of these gambling accounts.

This data was collected from Twitter's public APIs, using Method52, a piece of software developed by CASM in partnership with Sussex University to enable the collection and analysis of large, online datasets.

While it is difficult to compile a complete list of active betting-related accounts on Twitter, a number of techniques were used to ensure we were collecting from a diverse range of gambling accounts. These included analysing accounts mentioned alongside known gambling accounts, tracking accounts which used gambling related keywords, such as "acca" and "odds", were collected during England's early matches during the 2018 World Cup, and a series of manual searches using Twitter's search functionality. All Tweets sent from accounts were collected through periodic use of Twitter's

'user timeline' endpoint, which allows an account's 3,200 most recent Tweets to be collected[6].

The 417 accounts in the final collection were manually sorted into four categories, which will be referred to throughout the report:

1. 'Bookmakers': This category contains gambling accounts which directly allowed or encouraged people to gamble. This primarily consisted of accounts offering bets on the outcome of sporting or other events. It includes those directly operating as gambling services, as well as affiliate marketers - third parties who get paid a commission for directing customers to operator websites. Many of these advertise by offering 'free bets' with established bookmakers. Two example account descriptions are provided below (usernames and links have been removed):

> *Independent Bookmakers Since 1947 With over 50 Betting shops. Website, MobileApp & Phone Betting. 18+Only*

> *Your one stop shop for free bets, offers and promotions from the best bookmakers! Why pay when you can get them free!*

2. 'Tipsters': This category contains accounts run by users who regularly offer advice - 'tips' - on the outcome of (primarily sporting) events, often in return for payment or a subscription from users who are encouraged to follow them.

> *The community for people to share their betting tips and selections. The original home of #TwitterNAPs and #FootieNAPs #ShareSuccess (18+)[7].*

- *Safe football tips to build long term profit through Daily single bets, accumulators and target challenges.*

- *NO COST TIPS... Over 1,000 Points PROFIT in 2011...*

- *UK's # 1 Racing Information... 45% of Tips Finish 1st... Average Odds 7/2... 70% of All Bets are Profitable*

It should be noted that it was occasionally difficult to place an account into only one of these categories – for example, an account offering tips may also post affiliate links to other operators. Where this was the case, a manual inspection of the account's recent activity was undertaken to assess the focus of that account. Similarly, it is not always possible to discern from Twitter data whether an account sharing links to another gambling operator is in fact operating as a registered affiliate of that company, even if it seems unlikely that they would do so without compensation.

3. 'esports': This category includes accounts focused on betting on the outcome of esports events - primarily online video games such as Counterstrike: Global Offensive, DOTA 2 and Overwatch.

- *At [link] we aim to bring you the best #CSGO betting sites on the web. Experience the thrill of #esportsbetting with the top odds and bonuses!*

- *Largest & most trusted bitcoin betting site. Wager anonymously on #esports & more! Blackjack, Poker & Dice. [link]*

4. 'Other': This category contains accounts which Tweeted about sports or gambling, but from a perspective not directly associated with the business of placing bets. It includes journalists, commentators, and accounts focused on specific sports.

- *A free monthly magazine for fans of horse racing*

- *Head of Media, The Action Network, trying to make stuff that makes sports fans smarter.*

Geolocation - UK

We wanted to study the reaction to Tweets sent from gambling accounts from users within the UK. To achieve this, a pre-trained classifier within Method52 was used to infer, where possible, the country from which a Tweet has been sent.

We found that, of Tweets **mentioning** a gambling account, **1,585,274** (25%) were classified as likely to have been sent from within the UK. Of accounts **following** gambling accounts, **700,213** (15%) were classified as likely to belong to UK users. These UK samples will be used throughout the report when referring to followers and mentions.

Preliminary classifying of the content of gambling Tweets

Tweets posted by gambling accounts span a bewildering breadth of discussion, and included tips and promotions urging people to place bets, responses to technical issues raised by customers and multiple jokes at the expense of football managers. To filter this noisy dataset down, analysts trained a series of Natural Language Processing (NLP) algorithms to identify Tweets relevant to gambling.

These classifiers were trained using Method52, which allows analysts to train NLP algorithms to make decisions about pieces of text - in this case, whether or not a given Tweet is relevant to gambling advertising- within large, free-text datasets. This process involves manually labelling a random sample of documents. By recording the terms occurring within each category, a classifier 'learns' how to sort Tweets, and can provide feedback on its performance to the analyst. Once a satisfactory performance has been obtained, the classifier can then apply rules developed for sorting to the entire dataset, allowing complex decisions to be made across the totality of datasets too large for manual analysis[8].

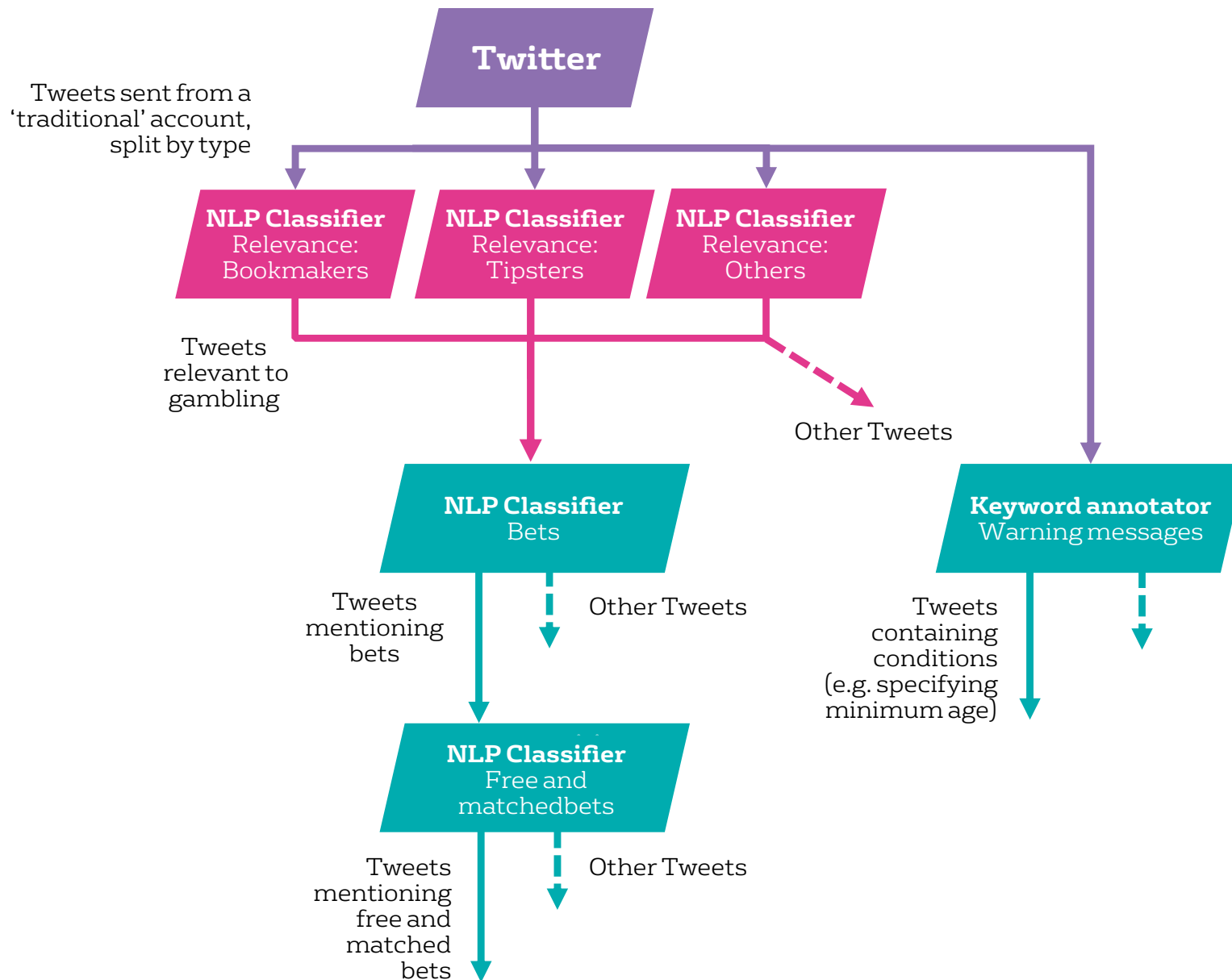Diagrams showing the classifiers trained for each subject area in this report are shown on the next page.

Twitter

Tweets sent from a 'traditional' account, split by type

NLP Classifier Relevance: Bookmakers

NLP Classifier Relevance: Tipsters

NLP Classifier Relevance: Others

Tweets relevant to gambling

Other Tweets

NLP Classifier Bets

Other Tweets

Tweets mentioning bets

Keyword annotator Warning messages

Tweets containing conditions (e.g. specifying minimum age)

NLP Classifier Free and matchedbets

Other Tweets

Tweets mentioning free and matched bets

Fig 1a: Classification pipeline for Tweets sent by traditional accounts

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Twitter

Tweets sent from a 'esports' account

NLP Classifier
Relevance: Tipsters

Tweets relevant to gambling

Other Tweets

NLP Classifier
Bets

Keyword annotator
Warning messages

Tweets mentioning bets

Other Tweets

Tweets containing conditions (e.g. specifying minimum age)

Other Tweets
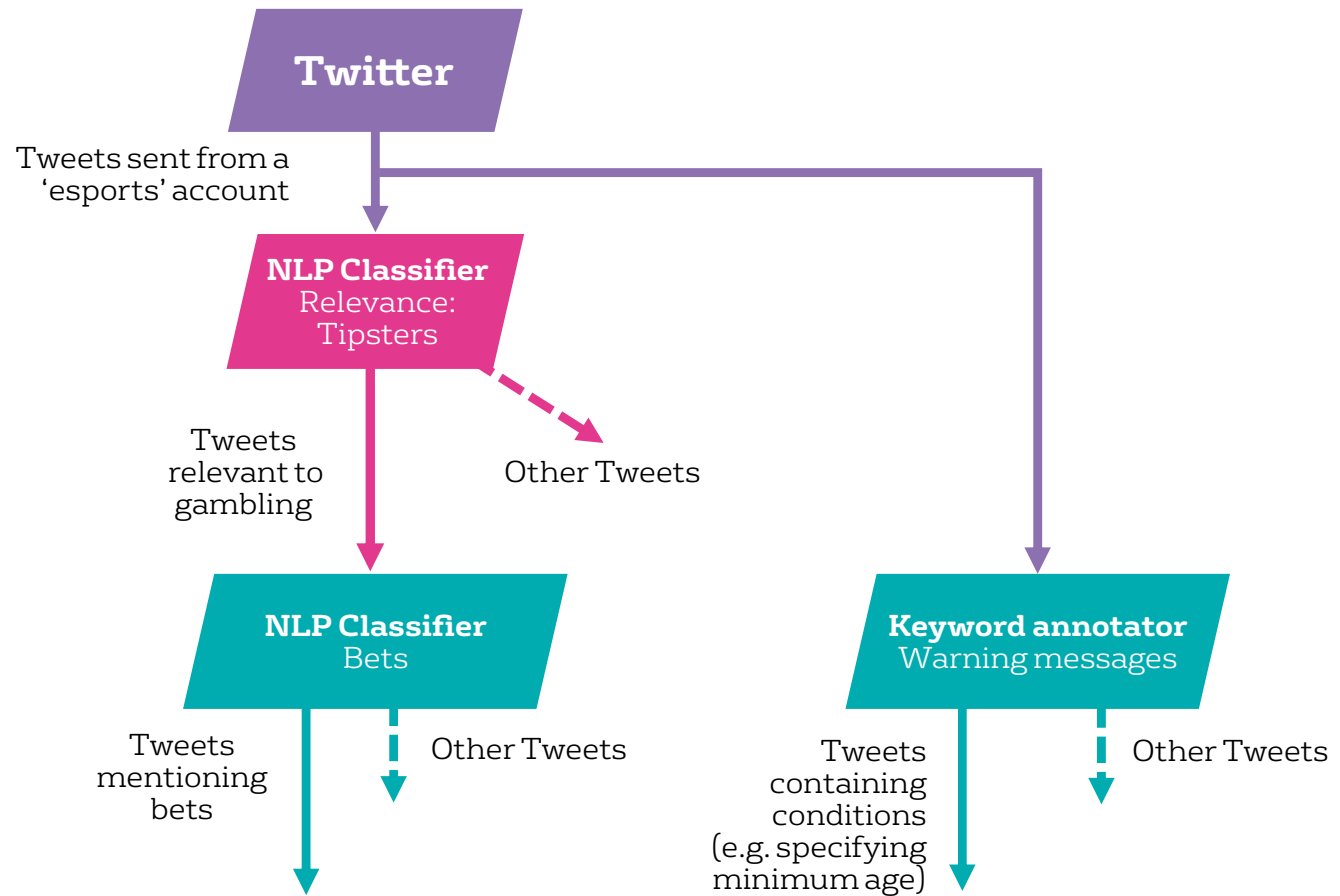
Fig. 1b: Classification pipeline for Tweets sent by esports accounts

***Matched betting** is a betting technique used by gamblers to exploit free bets and incentives offered by bookmakers in order to reduce their risk. The idea is that, if Bookmaker A is offering £10 free if you place a £10 bet, a gambler could place a £10 bet on a team to win a match with Bookmaker A and a £10 bet at equivalent odds on the same team to lose the match with Bookmaker B, and be guaranteed the free £10 as profit. This is often sold as a 'sure fire' way to make profit gambling, but is also used by bookmakers and affiliates to encourage users to create accounts and start, or continue, placing bets.*

Classification – types of Tweet

The first classifier built for this report was trained primarily to remove discussion from gambling accounts which was not directly related to gambling and gambling advertising. As such, we aimed to cast a wide net around gambling relevant activity. A full description of the decisions made when defining these categories, alongside examples of Tweets which fall into each, are included in the methodological report.

Tweets classified as **relevant to gambling** included the following categories:

- Tweets from Bookmakers and Affiliates inviting bets
- Tweets from tipsters, providing information on events
- Tweets about esports gambling:

Tweets judged not directly **relevant to gambling** included general banter and customer service messages.

A series of NLP classifiers and keyword annotators was used to make further distinctions within relevant Tweets. In particular, we identified Tweets mentioning **specific bets** (e.g. encouraging users to place a bet immediately or in the near future), Tweets mentioning **conditions** on gambling (e.g. age restrictions) and Tweets mentioning **'free' or matched bets**.

Age classification

In order to investigate the actual makeup of the audience for gambling advertisements online, researchers at Sussex University's Text Analytics Group worked with CASM to train a second type of classifier - a Multi-View Neural Network (MVNN) – able to make an assessment of a Twitter user's likely age. This classifier uses various public details concerning a user's profile - for example, their user description, or the platform they are Tweeting from - to assign them to one of three age ranges: 0-15, 16-23, and 24+. It should be noted that this method will ascertain a user's self-reported age, and will not detect purposefully falsified accounts.

MVNN models are difficult to train, and tend to require a large, labelled dataset to perform well. However, they offer some advantages over the classifiers outlined above. Rather than making a decision only on one aspect of the data - a Tweet's text, for example - MVNN models are able to incorporate multiple metrics when labelling documents.

In testing, the algorithm used in this report was found to be 67% percent accurate in making decisions across all three age ranges, and 78% accurate when classifying users in the 0-15 range; the range which we concentrate on in this report. A detailed technical description of the process of building this classifier, along with further details on accuracy, can be obtained from the authors.

Findings

Volume

The following table shows the number of Tweets sent from each type of account between 1st March 2018 and 1st November 2018 (246 days), along with the rate at which they were sent. Note that the 'bookmakers' category includes those sharing affiliate links to other sites.

Account type	Accounts	Tweets	Average Tweets per Account	Average Tweets per Account per Day
Total	417	888,745	2131	9
Bookmaker	109	380,388	3490	14
Tipster	226	388,523	1719	7
Esports	44	47,943	1090	4
Other	38	71,891	1892	8

Table 2: Accounts collected by type

Table 2 shows the scale of gambling activity on Twitter, with each 'bookmaker' account sending out an average of 14 Tweets per day. Some accounts were much more active. The most prolific account, a football tipster account called '@footysupertips', sent 30,080 Tweets during the collection period, an average of 122 Tweets per day, and the five largest operators in the dataset - Ladbrokes, bet365, Coral, Betfred and Paddy Power, sent an average of 19,100 Tweets, or 78 each per day, during the collection period.

While bookmakers and tipsters make up nearly equal proportions of the total Tweets, we found that the average bookmaker account was far more active than the average tipster. This table also shows that accounts Tweeting about 'traditional' sports are far more active than esports accounts, though this may reflect that traditional bookmakers offer odds for a much wider range of sports and outcomes.

Widely shared content

Table 3 shows the 10 most ReTweeted Tweets sent by gambling accounts during our collection period. ReTweeted show one important measure of a Tweet's popularity online – messages reTweeted by the public are not only more likely to have been seen by users who may not themselves follow a gambling account, but also gain a level of endorsement from the users who share them.

Tweet Text	Account	Account type	RT Count	Favourite count
Enter our brand new giveaway where you have the chance to win a @FACEIT 2018 London CS:GO Major Championship Mega Bundle! Stickers for days bois! Enter here: [link] [image]	betwayesports	esports	26,368	873
Buckle up Stoke fans. Some guy called Henry has given you an absolute roasting. Sit back, relax and enjoy. It's #FanDenial. [video]	paddypower	bookmaker	18,276	34,708
La Liga since 2009, when Cristiano joined Real Madrid: Goals Messi - 329 Ronaldo - 311 Assists Messi - 122 Ronaldo - 88 Titles Messi - 6 Ronaldo - 2 Top Goalscorer Messi - 5 Ronaldo - 3 Player of the Year Messi - 5 Ronaldo - 1	bet365	bookmaker	13,786	23,765
I saw this on Facebook earlier and thought it was well worth a mention due to the England game @ 2pm as I know this does happen when England score. RT to share and pass this on please [link]	footy_tipsters	tipster	9,251	8,680
Most goals, assists, key passes and dribbles this season: Premier League: Salah De Bruyne Özil Hazard Bundesliga: Lewandowski Müller James Coman Ligue 1: Cavani Payet/Depay Payet Neymar Serie A: Immobile Luis Alberto Gómez Anderson La Liga: Messi Messi Messi Messi	bet365	bookmaker	7,633	15,515
Besiktas fined £29,880 for a cat running on the pitch. Russia fined £22,000 for racism. [link]	paddypower	bookmaker	7,265	15,444
Deontay Wilder wanted to show-off how hard he punched on ESPN He broke this mascot's jaw after not realising there was a person inside 😳 [video]	ladbrokes	bookmaker	7,026	13,802
Pickford's saves Maguire's headers Trippier's free-kicks Kane's goals Gareth's waistcoat Thanks for the memories, England. [link]	bet365	bookmaker	6,882	35,081
More shocking scenes at Ascot yesterday after some very unsavoury scenes at Goodwood last week! Something needs to be done to sort this problem out ASAP! 😡 [link]	twenclosure	tipster	6,576	10,277
With Ireland not going to Russia, we're supporting Nigeria at the World Cup for several significant reasons: ✅ The kit looks class ✅ They play in green ✅ Nigeria consumes more Guinness than Ireland #COYBIG #ENGNGA	paddypower	bookmaker	5,838	8,890

Table 3: Most ReTweeted Tweets sent by gambling accounts

This table is dominated by established, 'traditional' gambling operators, with a few notable exceptions. One of these, the most shared Tweet in the dataset, was sent by Betway's esports division and invites users to enter a giveaway to win stickers of popular esports teams - examples are shown in a colourful embedded image. This offer is potentially a "name capture" exercise, allowing Betway to collect the details of esports fans to target in future marketing.

Fig. 4: Image embedded within the most ReTweeted Tweet from any operator within our dataset, showing esports teams included in a sticker giveaway

Notably, these Tweets are all 'content marketing' rather than direct links to betting. None of these highly ReTweeted Tweets contains an invitation to place any type of bet; the list is composed instead of content that evokes amusement, surprise, or the feeling of being an insider – all emotions designed to drive brand engagement and community-building. This illustrates two distinct purposes of gambling advertising: to drive longer term emotional brand engagement on the one hand, and elicit short-term actions such as placing a bet or opening an account on the other. The importance to gambling related accounts of posting sharable, engagement content which is likely to increase people's engagement with their brand, but is not directly relevant to gambling should not be underestimated. For example, the second most widely shared Tweet contained a video which has been viewed over 1 million times. The video - a montage put together by PaddyPower of a Twitter exchange between football fans - draws on deeply held rivalries between teams. It should also be noted that the content of this video contains explicit language and threats, and is not suitable for children.

Tweets relevant to gambling

As described above, an algorithmic classifier was trained to identify Tweets within the dataset which were directly related to gambling and gambling advertising. These were classed as 'relevant to gambling.' These Tweets were found to comprise 60% of Tweets sent from all types of gambling related accounts in our dataset. This proportion varied with the type of account.

Account type	Total Tweets	Tweets relevant to gambling	% Tweets relevant to gambling
Total	888,745	536,339	60
Bookmaker	380,388	227,114	60
Tipster	388,523	258,650	67
esports	47,943	26,573	55
Other	71,891	24,002	33

Table 5: Relevant Tweets by account type

While the majority of content was specifically gambling-related, both traditional and esports accounts shared a significant amount of other content. This reflects the need for these accounts to engage with their audience and create content that can bring in followers, alongside promoting specific services or bets.

However, this surrounding brand building activity isn't so important for Tipsters, who are followed precisely for their expert advice on specific bets - they can, perhaps, worry less about brand building. Unsurprisingly 'other' accounts posted significantly less gambling-related content, focussing instead on the events themselves.

Individual accounts also varied in the amount of relevant material they sent. The graph below shows the distribution of accounts, sorted by the percentage of relevant Tweets sent during the period. Only accounts which Tweeted regularly during the collection - more than once a week on average - have been included here.
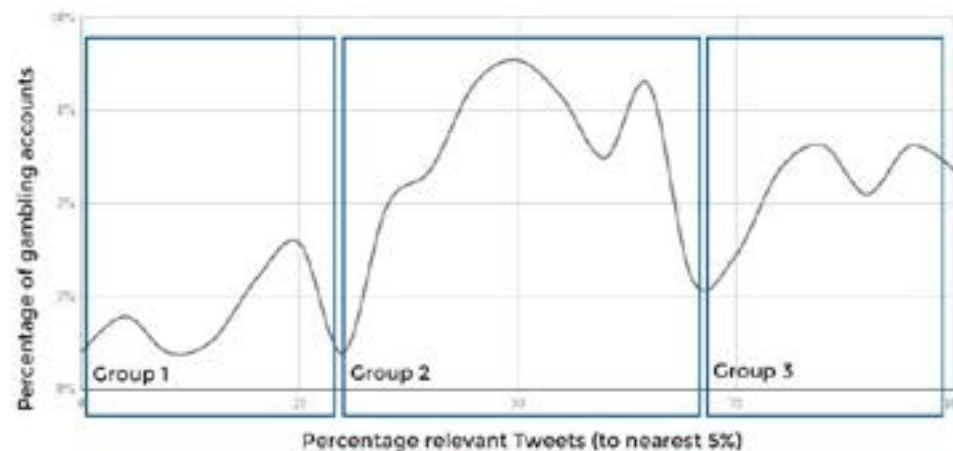
Fig. 6: Active gambling accounts by percentage of relevant Tweets

This graph shows roughly three different engagement tactics used by gambling accounts.

1. The first group, around 13% of the dataset, primarily sent content which was not directly related to gambling (<30% relevant Tweets).

2. The second and largest group, comprising 57% of accounts, balanced their output, sending between 30 and 75% relevant Tweets.

3. The third group, comprising 30% of users, concentrated on relevant outputs, sending at least 75% relevant Tweets. Some took this to an extreme - seven accounts, (3 bookmakers and 4 tipsters) had every one of their Tweets classified as relevant.

Activity over time

Figures 7a and 7b show that both traditional and esports related accounts are highly responsive to events, with regular spikes occurring around football matches and prominent races. A particular flurry was observed during the World Cup, with 5,786 Tweets sent on the day of England's first match on the 18th June. This activity is set against a constant, ongoing stream of general, less event-specific engagement. Note that in each collection, an increase in Tweets can be seen a few days before the collection is finalised - this is due to limits on how far back we were able to collect data from Twitter's API once lists of accounts had been set.
As with traditional gambling, the volume of esports-related Tweets tends to increase around

major tournaments. For example, 'Defence of the Ancients 2', widely known as DOTA 2, holds a large annual tournament called The International, which had a 2018 prize pool of $25 million, took place between the 20th and 25th of August, and had a global viewership of 15 million people[9]. This event prompted a near doubling in the number of Tweets compared the average across the previous period. Similar and more drastic spikes occurred around other major tournaments for prominent games including Counter-Strike: Global Offensive and League of Legends.
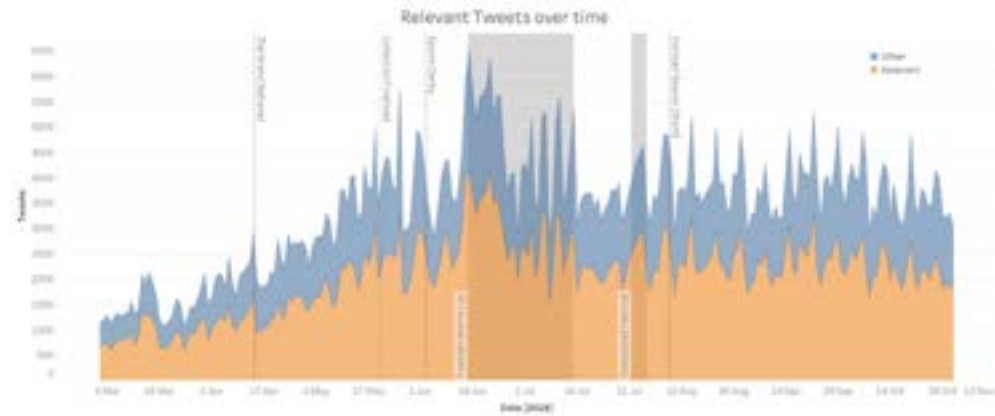
Fig 7a: Tweets per day sent from Traditional accounts over time
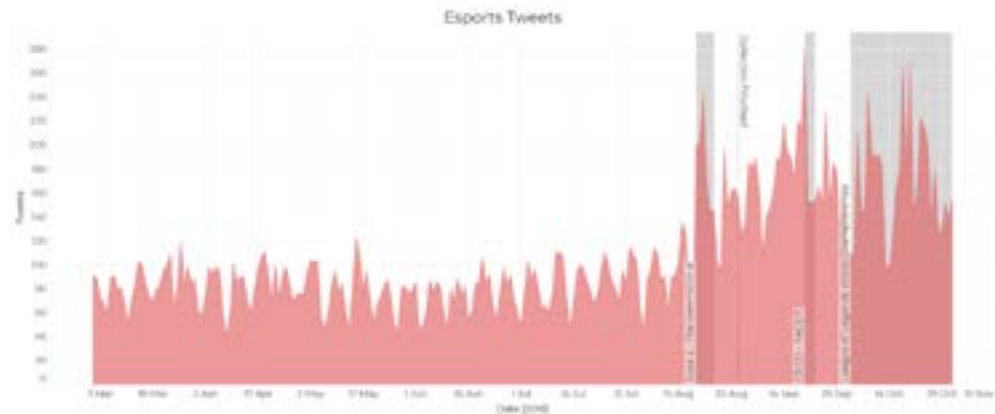
Fig 7b: Tweets per day sent from esports accounts over time

An interesting pattern emerges when we divide traditional accounts by type. Figure 5 above shows the number of Tweets shared by tipsters and bookmakers over the collection period. Notably, and especially during the 2018 football season, 'tipster' Tweets tend to reach a 'peak'

of activity, sharing their predictions, a few days before each match, whereas activity from bookmakers tends to peak on the day itself.
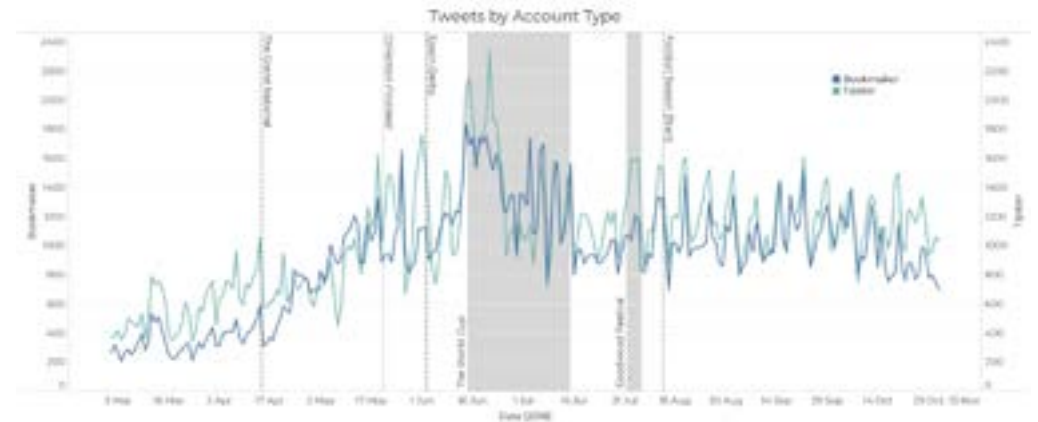
Fig 8: Tweets per day sent from 'bookmaker' and 'tipster' accounts

Time of day

Traditional and esports accounts display broadly similar patterns of activity throughout the daily cycle. However, Figure 9 shows that esports bookmakers are around twice as likely to be advertising during the early morning hours. In total, accounts sent 58,281 Tweets between the hours of 1am and 5am, with 264 users (64%) sending at least one Tweet during this time of the night.
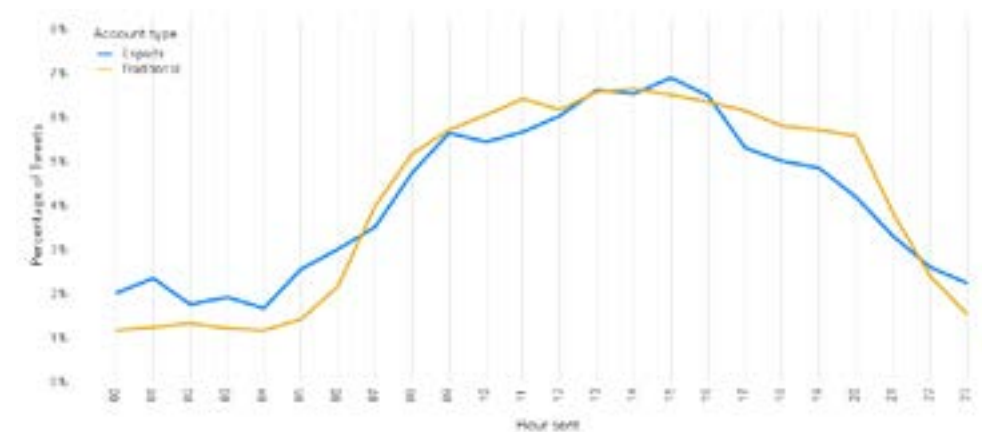
Fig. 9: % Tweets sent by traditional and esports accounts, by hour sent

Some of this variation will be due to the international nature of esports competition – a large number of high profile matches on which users are encouraged to bet take place in the USA, China and South Korea, at antisocial hours for the UK. While this activity may not therefore represent a strategy to target people late at night, research indicated that advertising at these times is likely to have a stronger effect on vulnerable users in the UK - research from the Money and Mental Health Institute, for example, suggests that vulnerable consumers are more likely to spend more late at night[10]. By advertising late at night, it is more likely that both traditional and esports marketing, but especially the latter, will affect vulnerable users. The manual content analysis by University of Bristol showed that 17% of esports Tweets encourage betting late at night or in the small hours.

Types of advertising

The following table shows the breakdown of gambling relevant discussion within the dataset, as divided the type of advertising underway in each.

Account type	Tweets Relevant to Gambling	Bets	% bets (of relevant)	Free and matched bets	% free bets (of bets)	% free bets (of all relevant Tweets)
Total	536,339	217,305	41%	102,137	47%	19%
Tipster	258,650	89,521	35%	45,020	50%	17%
Bookmaker	227,114	106,733	47%	46,984	44%	21%
esports	26,573	9,479	36%	-	-	
Other	24,002	11,572	48%	10,133	88%	42%

Table 10a: Tweets by type of advertising

Tweet types by account type
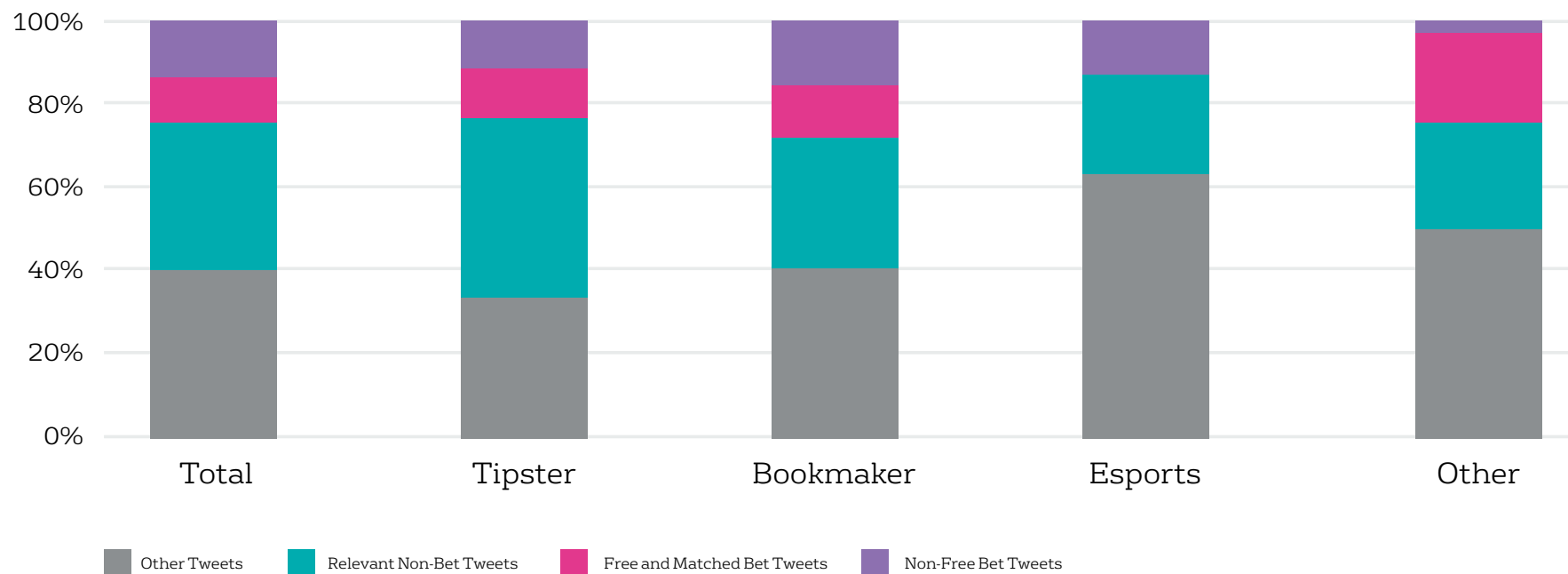
Fig. 10b: Tweets by type of advertising

These figures show that a high percentage of bet-related advertising on social media mentions free and matched betting. This is concerning as Hing et al. have noted that offers of free and matched betting have incited vulnerable people to increase their levels of gambling[11]. Note that the 'non free bets' category in Figure 10b refers to Tweets classified as bets, but not as 'free' or 'matched' bets.

When discussing betting, those in the 'other' group mentioned 'free' and 'matched' bets twice as much at the other groups – indeed, this discussion makes up almost all of this group's references to betting.

Warning messages

Method52 was used to label Tweets sent from gambling accounts which contained phrases related to age restriction, responsible gambling and terms and conditions applying to a bet or promotion within the text body of the Tweet, phrases referred to here as 'warning messages'. Only 64,573 (7.3%) of Tweets were found to contain one of these messages within the body of the text. Manual content analysis of the sample of visual imagery Tweets showed the inclusion of age restrictions, terms and conditions or responsibility messages in 69% of traditional accounts, but only 2% of esports accounts.

	Tweets from gambling related accounts	% of all Tweets
All Tweets	888,745	100.0%
Any warning message	64,573	7.3%
Terms and conditions	39,697	4.5%
Responsibility	36,301	4.1%
Age	769	0.1%

Table 11: Number and % of Tweets mentioning each type of warning messages within the body of text

Account type	% of 'warning message' content within the body of text
Bookmaker	7.3%
Tipster	6.9%
esports	0.1%
Other	13.9%

Table 12: % of Tweets mentioning conditions by type of account

Table 11 shows that, across all types of account, the vast majority of gambling related content does not contain a 'warning' keyword or phrase. Furthermore, where warnings are present, they are more likely to be a mention of terms and conditions than a mention of age restrictions or a message around responsible gambling. This is especially acute for esports accounts, where only 0.1% of Tweets contained a relevant term in the text and 2% in an image.

Researchers also examined the number of links present in 'terms and conditions' Tweets. While the majority (70%) of Tweets mentioning this condition contained a link, 1325 Tweets, including those sent from large UK bookmakers, were found to contain a warning but did not seem to contain a link to further information.

Warning messages are also less frequently present in Tweets which consist solely of text. Within these text-only Tweets, only 5,955 - 1.2% of those without embedded media - contained a warning message.

One interesting feature of this data can be seen when examining the percentage of 'warnings' mentioned against the type of Tweet content:

	All Tweets	Relevant to gambling	Bets	Free bets
% of Tweets containing a warning	7%	12%	28%	50%

Table 13: % of warning messages within Tweets of different types

Notably, Tweets advertising 'Free Bets' are more likely to contain a warning message within the body of the text than those advertising other types of bet. these types of advertisement also contain a higher percentage of warning text within the body of the text.

Warning messages within Tweets not directly related to gambling

A minority of Tweets containing warnings did not contain other bet-related advertising. Across the three categories of 'warning' discussed above, only 657 Tweets classified as not relevant to gambling (0.19% of all non-relevant content) contained a condition. Some of these were standalone messages about gambling responsibly, for example:

Avoid gambling when you're feeling tired or frustrated.Gamble responsibly. #WhenTheFunStopsStop [link]

Others, however, were promotional Tweets for competitions run on social media, also containing a mention of terms and conditions:

*#FreeBetFriday time! T&C's > [link]
Who did Tyson Fury beat in his last fight in 2015?
Your reply must include #FreeBetFriday - one random winner picked later.*

With this 'terms and conditions' category removed, only 444 (0.12%) of non-relevant Tweets contain a condition.

Warning messages within user descriptions, and age screening on Twitter

While performing this classification, researchers noted that some accounts occasionally included a warning within their user description. Some examples of this are below:

#1 Football betting tipsters. We use concise data & analysis to assist you in your bets. Gamble responsibly! (Followers must be 18+) [link]

The world's sharpest bookmaker sharing unique betting insight and explaining how betting works. Gamble responsibly.

To measure the extent of this, user descriptions were passed through the same keywords annotators described above, using Method52. This analysis found that, while only 86 of all gambling related accounts (20%) tended to include a relevant term in their description, these accounts were together responsible for 51% of Tweets collected, suggesting that larger operators tend to include some form of warning in their user account.

This kind of display however, is not likely to be an effective way of warning users about gambling. Users viewing Tweets will only see warnings contained within a description if

they follow a link to the originator's account. Furthermore, we found that these warnings are not often backed up in practice. Twitter offers a free age screening service to 'a select number of advertising partners', which will prevent a user from following an account if they have declared themselves to be under 18, or have not set a date of birth in their user profile.
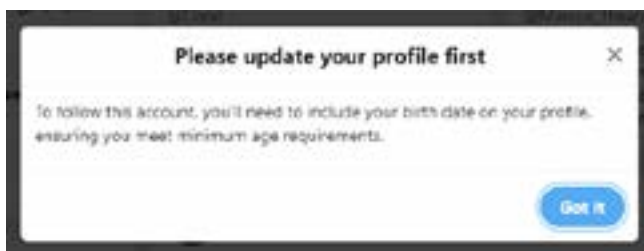

Fig. 14: Warning displayed to Twitter users who have not set a profile age if they attempt to follow a restricted account

To discover how often this feature was being used by accounts in our dataset, researchers created a blank Twitter account, without specifying an age, and attempted to follow the 20 most active 'traditional' and esports accounts respectively. We found that, while 16 traditional and 9 esports accounts stipulated that followers must be over 18, only 7 traditional accounts and a single esports account prevented us from following them using the screening process described above.

While it is encouraging that a tool exists to prevent young users from accessing gambling content, it is clear that this could be more widely used. Age warnings in the account descriptions of gambling accounts are unlikely to be seen and acted upon by those viewing their Tweets, and it is likely that offering or enforcing the use of the age screening tool more widely would reduce children's exposure to harmful messaging.

Use of media and links

The majority of gambling-relevant Tweets (55%) sent by gambling related accounts were found to contain media - embedded images, video or short animated gifs. Gambling content on Twitter is also significantly more visual than content as a whole. To compare this content to general media use on Twitter, researchers analysed a random sample of 365,000 English language Tweets collected from Twitter's 1% streaming endpoint; we found that only 19% of these contained media of some form.

A high quantity of gambling related Tweets also contained links to sites outside of Twitter - these were found in 68% of our dataset.

Use of media within a Tweet was found to drastically increase the number of interactions it is likely to receive. Within Tweets mentioning a gambling account, we found that the average number of engagements - replies or ReTweets - with Tweets containing images was 3.6 times that of Tweets without images.

The proportion of Tweets containing both media and links changes with the type of content shared. The table below shows the proportion of each of the various types of gambling message.

	All Tweets	Relevant to gambling	Bets	Free bets
% Tweets containing media	45%	55%	77%	90%
% Tweets containing URLs	54%	69%	89%	96%

Table 15: % of Tweets from gambling related accounts containing media and links

These figures show that as gambling content becomes focused on directing people to offers most likely to be tempting to vulnerable users - particularly the promise of 'free' bets - it is more likely to contain visual content, and a link to an external site. This is especially concerning given findings elsewhere in this report that visual content is more likely to be engaged with by younger users in general.

Audiences

Audiences - children

Social media is inherently an undirected medium. Many platforms allow organisations to specify a desired audience for promotional posts - indeed, selling the capability to perform this targeting is a major part of the business model for social media companies, including Twitter. This targeting, however, applies to paid advertisements, and not to posts made by accounts themselves. These self-published, 'organic' messages are the ones which make up this dataset.

The ASA stipulates that special care should be taken when gambling companies are advertised to children, which they define as anyone under the age of 16[12]. The challenge here is that effective content on platforms, especially published by brands, is often designed to be widely attractive, memetic and, most importantly, shareable. As a result, it is very difficult to restrict, or even predict, the audience for a given piece of messaging.

To investigate the broad age range of users following gambling accounts on Twitter, publicly available details of the accounts of 700,213 UK users following one of the gambling related accounts identified above were collected from Twitter's API, and classified using an MVNN classifier. (See the 'methodology section for a brief description of this).

These accounts were also classified to identify 'institution' accounts, unlikely to belong to an individual. These accounts comprised 11.2% of UK followers, and were removed from the dataset. The remaining 621,545 accounts were divided as follows:

Type of gambling account	UK Followers	UK Followers aged 0-15	(% of total)	UK Followers aged 16-23	(% of total)	UK Followers aged 24+	(% of total)
Total	621,545	41,303	7%	411,968	66%	168,274	27%
Average across all Twitter users	-	-	10%	-	70%	-	19%
Traditional	613,986	39,848	6%	406,593	66%	167,545	27%
esports	9,332	1,602	17%	6,468	69%	1,262	14%

Table 16: Percentage of followers by age range, compared to the average age on Twitter

To find the average age of Twitter users, we analysed a random sample of 366K English language Tweets drawn from Twitter's 1% sample API, and classified them using the same neural net as we used to gauge age amongst gambling followers.

To put the numbers in Table 16 into perspective, if we take into account the classifier's estimate of the number of users labelled as 0-15 who are likely to be in there by accident (37%) we get an expected lower bound of 27,600 children within the UK following any type of gambling related account on Twitter. Remove the requirement for the following account to be within the UK, and the lower bound of children following a gambling account worldwide becomes 297,000. The actual number in both cases is very likely to be higher, as a number of children will have been misclassified as 16-24 year olds.

Figure 16 shows that on average, children comprise a smaller percentage of users following traditional gambling related accounts than they do of the general Twitter population. However, followers of esports-related accounts are much more likely to be children than those of traditional accounts, with three times the proportion of 0 - 15 year old followers.

Audiences - financial vulnerability

Alongside a focus on content consumed by children, this project aimed to explore conversations and marketing communications consumed by potentially vulnerable users. Studying vulnerability through self-reported messages on social media is challenging. Demos' 2016 study showed that accounts run by charities supporting those vulnerable to or with experience of gambling addiction are not well linked to mainstream gambling discussion on Twitter, so followership of support accounts, for example, is not likely to be a good test for vulnerability. Furthermore, both sports-related discussion and social media content are frequently irreverent, chatty and sarcastic. This makes it difficult for algorithms to flag genuine difficulties people might be facing, as it is likely that Tweets meant as jokes would be flagged as displaying vulnerability.

To study vulnerability within our datasets, researchers focused on the set of 6.4 million Tweets which mentioned a collected gambling account. These were considered for three types of vulnerability - difficulties in comprehending English, gambling addiction and financial problems. After extensive sampling of these Tweets, self-reported financial vulnerability was judged

to be most likely to be conducive to analysis using our data. To investigate this, researchers compiled a list of keywords and phrases likely to indicate financial difficulties when used; such as 'skint', 'can't afford' etc, and used Method52 to compile a set of Tweets which used these terms. This list was iteratively added to and adapted, with further terms discovered within relevant Tweets were added to the list as they turned up during coding. The final list of phrases is included in an annex to this document. This process produced 490 Tweets mentioning a gambling account and using a keyword relevant to financial vulnerability. However, many of these Tweets were irrelevant - related e.g. to the financial woes of football clubs. (To protect the privacy of individuals here, all of these example quotes below have been through a process of 'bowdlerisation' - the wording has been changed without changing the meaning - and personal usernames and links have been removed.)

@LaticsOfficial @OfficialBWFC @SkyBetChamp OK lads look we realise ur skint but steady on fucking hell

To remove this irrelevant data, the sample was manually annotated by researchers to identify Tweets which mentioned personal financial vulnerability. These fell roughly into the following categories:

1. General commentary of being low on cash or overspending

@[username] @FootyAccums @[username] It's this kind of thing thats why I never have money after payday weekend

Bloody love giving @SkyBet money all the time. Any chance I can get some back I'm skint?

@LandofInplay I am finished no more money on bet365 lost 150 in 2 days with your tips [link]

Tonight I was planning on staying in as I'm skint til Friday, so thanks @SkyBet for the free monthly pass; saving me £ [link]

2. Requests to bookmakers
These were often for free bets, or requests for operators to pay out on previous winnings

@paddypower sort us a quid's free bet i'm skint #finderskeepers

Hey, @Betfair I'm skint and had £1.20 on England to win 4-1 with Kane scoring first, on 45-1 odds. Mind paying out anyways considering we were robbed 2 penalties which would've made me bang on? Worth a try considering I'm out of money for booze on World Cup month

I'm a bit skint. Skybet could you please just pay out. Kind regards x [link]

3. Mentions of needing to cut down or stop gambling

I was in @Boylesports , I was going to back them and I said fuck it, let them win but without my money. I can't afford to bet, haven't gambled since mum died.

@[username] @[username] @SkyBet I can't afford to bet £5 three times a day for a month or I'd be skint. I'm betting smaller amounts on all the games and it still comes to a lot during the course of a week plus I'm trying to cut down on gambling.

This process identified 88 Tweets as mentioning personal financial struggles, from 86 users. This is not a large enough sample to allow us to generalise over our dataset, let alone financially vulnerable users in the UK, or on Twitter as a whole. Nevertheless, though small, the engagement between this sample of users and gambling accounts is directly relevant to the questions raised in this report.

While none of these accounts followed any esports accounts, 67 users (76%) followed at least one 'traditional' gambling account, and, notably, 52 users (60%) were in turn followed by at least one account. On average, accounts mentioning financial vulnerability followed 3.6 accounts relevant to gambling; around double that of all followers. Eight of these users were classified as being under the age of 15.

One notable finding here is that these users tended to engage with gambling accounts far more than the average user within our collection. Of users mentioning a gambling account, the vulnerable accounts above sent 10.9 replies to or ReTweets of gambling related content per user on average, compared to an average of only 3 replies or ReTweets across all users.

Engagement with gambling related content

In order to understand how users engage with gambling advertising on Twitter, we looked at users who had interacted with a gambling-related Tweet in a public way - either 'ReTweeting' it to reshare it with their own followers, or directly replying to it.

It should be noted that the data available to this report cannot capture every form of engagement. While Twitter enables the sender of a given Tweet the ability to see detailed information on that Tweet's reach - the number of users who have viewed a message, for example, or watched an embedded video - this data was not available to CASM for collection. Accordingly, this report captures active engagement - users publicly replying to or ReTweeting a Tweet from a gambling account.

Table 17 shows the breakdown by account type of 189,554 ReTweets of and replies to Tweets, sent from users classified as being within the UK.

	UK Replies	UK Retweets	Ratio (replies:RTs)	UK Replies per Tweet	UK RTs per Tweet
Total	189,554	274,238	10 : 15	-	-
Book-maker	118,167	186,692	10 : 14	0.60	0.94
Tipster	69,578	81,521	10 : 12	0.35	0.41
esports	181	951	10 : 53	0.01	0.03
Other	1,628	5,074	10 : 31	0.05	0.15

Table 17: Engagement by account type.

Note - since there were days during the collection period on which mentions of gambling accounts were not being collected, this number is calculated based on Tweets sent while the collection was in progress, rather than the totals quoted earlier in the report.

Two things are striking about these figures. Firstly, traditional bookmaker accounts receive a lot more engagement per Tweet sent than any other type of account. Secondly, there is a marked difference in the ratio of users replying to content against users simply resharing it.

Tipsters, and to a lesser extent bookmakers, can be seen to promote conversation; a relatively high quantity of their engagement involves conversation with users. Users who follow esports accounts, however, are much more likely to ReTweet a Tweet than reply to it. While this could signal a less engaged audience, content ReTweeted by a user is displayed on the timelines of every one of their followers, whereas these followers do not see the original Tweet in the case of a reply. As a result, while the 'esports' audience is as a whole less responsive, those who do interact are much more efficient at disseminating messages to their followers.

The form of content used also alters its demographic appeal. The table below shows engagement levels with Tweets which do contain media, against those which consist solely of text:

Age range	UK Users engaging	UK Engage-ments: With media	UK Engage-ments: Without media
Total	145,334	388,047	75,745
0-15	13,201	5%	5%
16-23	99,301	63%	59%
24+	54,467	32%	36%

Table 18: The effect of media on UK user engagement

Table 18 suggests that people under the age of 23 are slightly more likely to engage with content containing media than older Twitter users, though this effect is relatively small.

Table 19, below, shows the proportion of these engagements by age. As previously, replies and ReTweets from accounts classified as 'Institutions', and not likely to belong to an individual, have been removed from this measure. Percentages in this table reflect the proportion of engagement with each account type from each age band - e.g 5% of engagement with traditional 'bookmaker' accounts was sent from users aged 0-15.

Age band	UK Engage-ments: Book-makers	UK En-gagements: Tipsters	UK En-gagements: esports	UK Engage-ments: Other
0-15	5%	6%	28%	10%
16-23	60%	68%	66%	59%
24+	35%	27%	6%	31%

Table 19: Engagements with gambling accounts by UK accounts, divided by age range. Colours represent the highest values in each engagement type.

Within traditional forms of gambling, the engaged audience tends to look relatively similar on this measure - though those responding to 'bookmaker' and 'other' Tweets are likely to be a little older than those engaging with tipsters. Strikingly, however, Table 11 shows that 28% of UK engagements with esports content comes from children. Indeed, engagements with esports related content on Twitter are over five times more likely to be sent by children than those with traditional bookmaker accounts. Again this increases outside of the UK - when examined worldwide, the percentage of engagements for the 0-15 age band rises to 45%.

We turn now to the manual in-depth analysis of the tone, format and content of gambling marketing and advertising on Tweets including images as well as texts. We include our thoughts on the potential impact this content may have on children, young people, and the vulnerable.

Chapter 2. Public Images

In-Depth Manual Content Analysis

The manual content analysis constituted an in-depth exploration of the tone, format and content of a sample of Tweets containing image and text taken from the 880,000 Tweets in the original CASM sample. It also considered whether the content was likely to appeal to children, young people or the vulnerable.

Sample

We manually analysed a sample of around 800 Tweets containing image as well as text drawn randomly from the Twitter dataset gathered by CASM from 1st March 2018 and 1st November 2018. We divided these into four subsamples: 1) 241 advertising Tweets from bookmakers, affiliates and tipsters, 2) 181 advertising Tweets from esports operators, 3) 191 content marketing Tweets from bookmakers, affiliates and tipsters, 4) 190 content marketing Tweets from esports operators. Advertising Tweets were drawn from data classified by Method52 as 'relevant' i.e. they promoted a specific bet or gambling opportunity, whereas content marketing Tweets were drawn from those not classified as relevant i.e. they represented brand building activity that does not necessarily include an incentive to gamble in the short term.

Twitter Manual Content Analysis Sample		
	Advertising Tweets	Content Marketing Tweets
Bookmakers, Affiliates and Tipsters	241	191
esports Operators	181	190

Table 1: Manual content analysis sample

Content Measures and Analysis

In line with the content analysis of advertising executions appearing in other media (e.g. TV, radio, press, door-drop leaflets) carried out by Institute for Social Marketing at University of Stirling (ISM) for another part of this research, we concentrated on measuring and elucidating three aspects of the tone and content of the four subsamples of Tweets:

1. Design Features
2. Topical Associations
3. Messages about Gambling Behaviours and Resultant Outcomes

ISM and University of Bristol together developed a bespoke codebook to capture these aspects of all of the creative advertising executions across all media. There were slight variations by media in line with their specific characteristics, for example to reflect the use of GIFs and memes in Twitter that are not used in TV or press advertising. Content marketing was only analysed in the Twitter sample and we used a slightly amended codebook – described below. The advertising codebook drew on previous research, the overall objectives of the research and industry codes. We then tasked two researchers with manually coding Tweets in accordance with this codebook. Guided by the principles of coherence and meaningfulness, reliability and explicitness, and sensitivity to subjectivity, distinctive steps were undertaken to ensure the soundness of the analysis. The codebook was piloted and reliability was ensured through regular meetings between the two coders which resulted in an inter-coder reliability rate of 94%.

Much of the guidance and advice given published in the CAP code and given by the ASA relates to advertising's particular appeal to children and, indeed, ascertaining particular appeal is a key objective of this research. Thus, where appropriate, the coding draws on the codes themselves and also the guidance and advice published by CAP and by ASA. In some cases, the findings below highlight cases which plausibly contain content which may not comply with these self-regulations; however, it should be noted that researchers do not seek to provide an assessment of whether any complaint would or would not be upheld. They acknowledge that such a judgement would also be subject to individual interpretation.

For the content marketing we also analysed design features, topical associations and messages about gambling behaviours and their outcomes but in addition we analysed the engagement tactics and emotions used to build brand affinity and propel sharing. According to the Content Marketing Institute[13] "content marketing is a strategic marketing approach focused on creating and distributing valuable, relevant, and consistent content to attract and retain a clearly defined audience – and, ultimately, to drive profitable customer action." Content marketing is a long-term activity designed to build brand loyalty and to encourage sharing which, at its most effective, results in a viral reaction.

As far as we are aware, a content analysis of content marketing has not been attempted before and certainly not in the context of gambling advertising on Twitter. A full review of the literatures on content marketing and social media sharing was not possible within the scope of this project but in this first exploration, we did identify the existence of a sparse but emerging academic literature[14] and practitioner models[15] which highlighted that a range of emotions and other design features such as GIFS, memes and community building can be effective in propelling social media users to share and develop brand affinity. We thus developed a content analysis codebook based on such previous research. This is available from the authors.

Findings

ADVERTISING TWEETS

Design features

We identified whether or not the advertising was easy to identify as such as well as the gender and age of the people or characters featured in the advert, the use of brand logos and straplines, the use of big brand claims, links to other forms of marketing, signposting to methods of gambling, the use of music, as well as the location or context of the advert. Comparisons will be made throughout between the Bookmakers' and Tipsters' adverts (referred to as 'traditional') and esports' adverts (referred to as 'esports').

Twitter advertising is hard to spot

None of the Twitter adverts in any of the four manual content analysis samples had any kind of labelling to make it clear to recipients that these are advertising communications designed to encourage gambling for the profit of the promoter. CAP Code 2.1 states that "marketing communications must be obviously identifiable as such" but this presents a new challenge within social media. The ASA has published additional guidance on the recognition of ads within social media, and discusses the particular challenge of advertorial content over sponsored or paid for posts[16]. They advise that, "on Twitter, as space is limited, including "Ad" (or similar) somewhere in the Tweet is likely to be the clearest way of identifying it as advertising." However, gambling advertisers on Twitter do not seem to be heeding this advice as "ad" was included in none of the 800 Tweets analysed.

We do not suggest that most competent adult users would not be able to identify much of this content as gambling related, for example where it clearly comes from a recognised gambling brand and advertises a clear gambling proposition, however we do suggest that children and adults with limited capacity to understand information may not necessarily know what brands are gambling brands and certainly not understand affiliate branding, their links to bookmakers or the role and nature of tipsters. The recognition of gambling advertising presents a further significant challenge on Twitter where content pushed by gambling operators is brand building activity designed to gain brand loyalty rather than specific incitement to bet. As such we suggest that at present it is not clear that children, young people or vulnerable adults could identify that the Tweets are designed to elicit a behaviour that profits a third party.

Images in Tweets are male biased

59% (n=142) of traditional and 22% (n=50) of esports adverts contained pictures of people or characters recognisable as either male or female. In both cases there was a very strong male bias with 83% (n=118) of the traditional adverts and 78% (n=39) of esports featuring males. This presumably shows who the advertisers believe to be their target audience. It also means that gambling disproportionately features men thus creating the implicit impression on viewers that gambling is a male preserve. This is relevant for regulators as the CAP Code has identified young men as a particularly vulnerable group[17]. The examples below show: an advert from Betspawn featuring young men at The International, a tournament for the popular esport game Defence of the Ancients 2 (DOTA2); UKCasino's advert to sign up with PaddyPower featuring only male sports stars; and X-Bet's advert to place a bet on a DOTA2 game with a character that is clearly male.

Fig 17: 🐦 Betspawn Tweet

Fig 18: 🐦 UK Casinos Tweet

Fig 19: 🐦 X-BET Tweet

Under 25s featured in Tweets

The CAP Code specifically prevents the use of images of anyone under the age of 25 playing a significant role in marketing communications for gambling. A recent ruling by ASA, for example, disallowed the use of Jordan Spieth (US golfer aged 21 at the time) in Twitter adverts from Coral, Bet365 and Totesport accounts[18]. 4% (n=10) of traditional and 6% (n=10) of esports Twitter adverts featured people who looked below 25 and thus appear to be in breach of the regulations. In the esports sample, Betspawn, for example, features gamers S1mple and Subroza who are both 21, whilst Nitrogen Sport features a gamer who appears to be school age.

Fig 20: 🐦 Betspawn Tweet
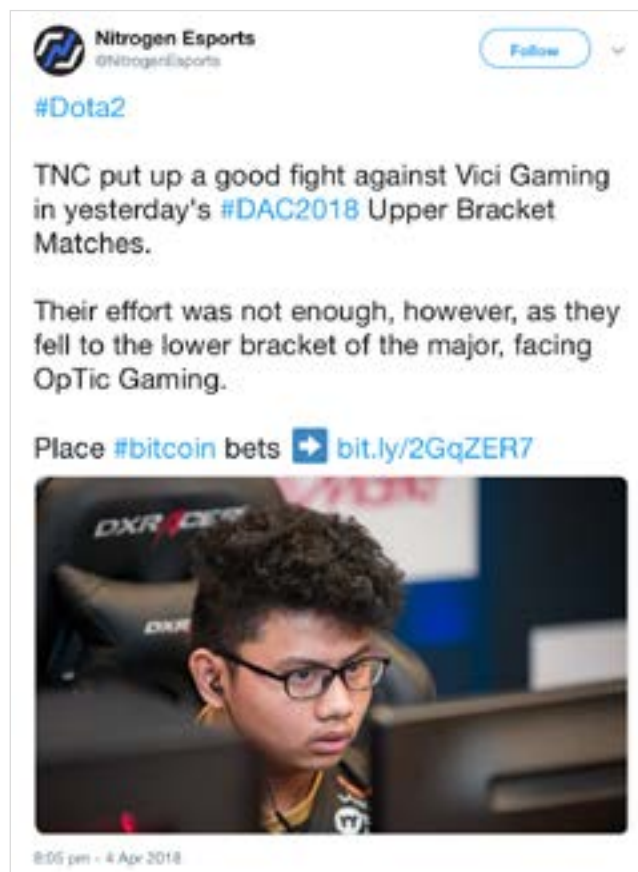
Fig 21: 🐦 Nitrogen Esports Tweet

Fig 22: 🐦 Sport4All's Tweet

In the traditional accounts we found a Sports4All's invitation to sign-up on Netbets featuring a cartoon of a primary school age child and a Freebigbets introductory offer, despite including an age restriction 18+ notice, showing an image of a young girl who looks to be in her teens.

Fig 23: 🐦 Freebigbets Tweet

Beyond this 28% (n=78) of traditional and 16% (n=28) of esports Tweets picture people under 35 which perhaps gives cause for regulatory concern given the identification by CAP of the vulnerability of "young" men.

Heavy branding, brand claims and 360 degree marketing

Branding is prominent in both types of account. 85% of traditional (n=206) and 94% (n=171) of esports adverts featured the brand logo on the Twitter profile although a much smaller number of accounts 11% (n=27) and 1% (n=2) respectively used a brand slogan or strapline.

Branding itself is, of course, simply an important part of marketing, but caution should be applied when it comes to claims made by brands. For example Section 3 of the CAP Code makes clear that big brand claims i.e. that the brand/

product/offering is superior to either a named competitor or to all competitors must be verifiable by an objective document[19]. 11% (n=27) of traditional and 4% (n=8) esports adverts claimed to be a superior or best brand. Counterstrike promises that you will "learn from the best and beat the rest" with no substantiation. 32Red Online Casino claims to have been awarded "Best Casino every year since 2003" but there is no indication given as to the awarding body.

Fig 24: 🐦 CounterStrike Tweet

Fig 25: 🐦 UK Casinos Tweet

80% (n=192) of traditional and 89% (n=161) of esports ads use 360 degree marketing i.e. the content links to another form of marketing emphasising the wrap around nature of contemporary gambling marketing. It is worth noting that every single advertising Tweet in both categories provided a link or other directions on how to place a bet.

None of the Tweets used music or a recognisable location in the marketing apart from games halls for esports.

Topical References

In this section we identified references to real world sporting events (e.g. World Cup match), references to a real-world story (e.g. news about a football manager), references to popular culture, use of humour and references to alcohol, tobacco or HSSF products.

Gambling advertising related to specific sports events

The strong link between gambling and sport and the promotion of betting opportunities in specific events is confirmed in this analysis of Twitter advertising. 55% (n=133) of traditional and 82% (n=149) of esports ads made reference to a specific real world event or sporting event. For traditional accounts in the period during which the sample was drawn it was often the World Cup, e.g. Marathonbet's advert to win a free T Shirt by predicting the correct score and first goal scorer in three named matches, or the current day's horse racing, e.g. The Winners Enclosure new customer offer advert to join Skybet on to-day's racing.

Fig 26: 🐦 Marathonbet Tweet

Fig 27: 🐦 The Winners Enclosure Tweet

Fig 28: 🐦 X-Bet.co Tweet

For esports, references were overwhelmingly for matches involving Counter Strike: Global Offensive (CSGO), Defence of the Ancients 2 (DOTA2), Overwatch and League of Legends. X-Bet for example incites readers to bet on Team Empire v Spirit in an upcoming DOTA2 match, whilst BetCSGO urges readers to bet on Chiefs v Legacy in a CSGO game.

Fig 29: 🐦 BetCSGO.eu Tweet

It was beyond the scope of the project to identify whether or not these references to real world games constituted in-match betting but this could be the subject of future research.

Reference to real life stories – much less common

A much smaller proportion of ads used real-life stories (6 traditional posts (3%) and 2 esports posts (1%) that might serve to normalise gambling and these were simply drawing attention to bets on particular sports celebrities be replaced or transferred such as this story on Thibaut Courtois.

Fig 30: 🐦 WeLoveBetting Tweet

Very few references were made to popular culture or humour (6 traditional posts (3%) and 2 esports posts (1%)). However, these sort of references are the staple fodder of the content

marketing Tweets that we analyse below and which turn out to be very different in nature to the adverts included in the two samples here. However emojis were widely used (40% of traditional posts and 64% of esports). It was beyond the scope of the project to quantify the most commonly used emojies but this could constitute a future study.

Messages about gambling behaviour and resultant outcomes

A great deal of the CAP regulatory Code on gambling advertising deals with the portrayal in advertising of gambling behaviours and outcomes as well as the onus on the advertiser to encourage responsible gambling. In this section we analysed whether or not the adverts appeared to contravene one of the 29 areas of regulation identified in our codebook.

Big difference between esports and traditional tweets

Our first finding was the substantial difference between the advertising content of the traditional and esports Tweets in terms of the messages about gambling and its outcomes and their approaches to responsibility. 68% of traditional accounts used content that we felt had some regulatory concern, this rose to 74% for esports and whilst 21% of traditional accounts we felt raised concerns related to children, this rose to 59% for esports.

esports	Traditional
74%	68%

Table 20: Regulatory Concern

esports	Traditional
59%	21%

Table 21: Regulatory Concern Related to Children

It should also be noted that given the youthful profile of video gamers and followers and given the use of cartoon type images within games it was often hard to ascertain if images and text had particular appeal to children or not – a judgement that is inherently subjective.

It is particularly interesting that whilst the majority, but by no means all, of traditional accounts included an 18+ age warning, Ts & Cs or a responsible gambling message only 2% of esports accounts did. The analysis of the two types of account is presented separately below.

CAP CODE AND TRADITIONAL ADVERTISING TWEETS

Of particular note is that of the 241 sites we analysed 68% (164) had at least one feature that raised some kind of regulatory concern. The key areas of concern are highlighted below.

Emphasising Monetary Benefits

In the literature review reported in another strand of this research it was stated that, "advertised financial incentives are becoming more attuned to take advantage of (these) decision making errors, rather than offering gambling incentives of true economic value". In tune with this, the CAP guidance document published in February 2018 noted that "new provisions will… prevent undue emphasis on money motives for gambling[20]". However, 34% (n=81) of traditional ads had a strong emphasis on monetary benefits. Examples include the Student Profits Tweet which urges readers to "make yourself an extra ££££+ a month in 2018 with examples of wins of £4000. The image on the Freebigbets Tweet draws attention to winning a £200 bonus.

Fig 31: Student profits Tweet

Fig 32: freebigbets Tweet

Susceptibility or inexperience of young or vulnerable people

Section 16.3.2 of the CAP code states that, "marketing communications must not exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children, young persons or other vulnerable persons." However, 37% (n=89) of traditional ads were found to potentially exploit the susceptibility or the inexperience of young or vulnerable persons. This was mainly due to financial incentives that were complex to understand or unrealistic. The short form of Tweets means that explanations are necessarily curtailed and therefore particularly prone to lack of clarity. For example Freebigbets advertises an account opening deal from Betbright with 7 different pieces of information contained in fewer than 40 words. Whilst this account does contain a 18+ only age warning, it is unlikely that someone with difficulties in understanding could take in all of this information.

Fig 34: 🐦 freebigbets Tweet

Fig 35: 🐦 Footy Accumulators Tweet

The literature review pointed out that "young people appear particularly susceptible to financial incentives. Some children incorrectly thought that these financial incentives meant that gamblers could never lose." Footy Accumulator's "bet £10 get £60" ; or Football Challenger's advert for William Hill "bet £10 get £30 in free bets" are examples of incentives we encountered that we felt are likely to be misinterpreted by children and were thus classified as a regulatory issue concerning children.
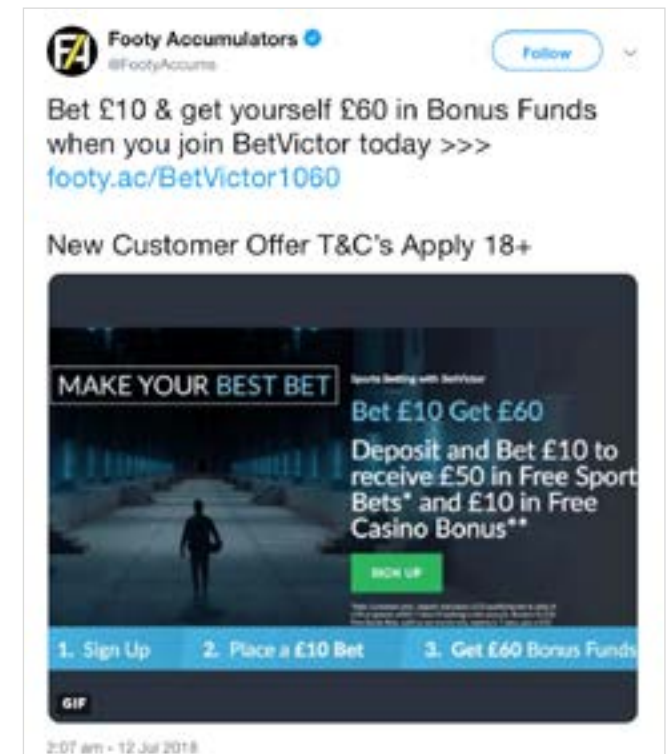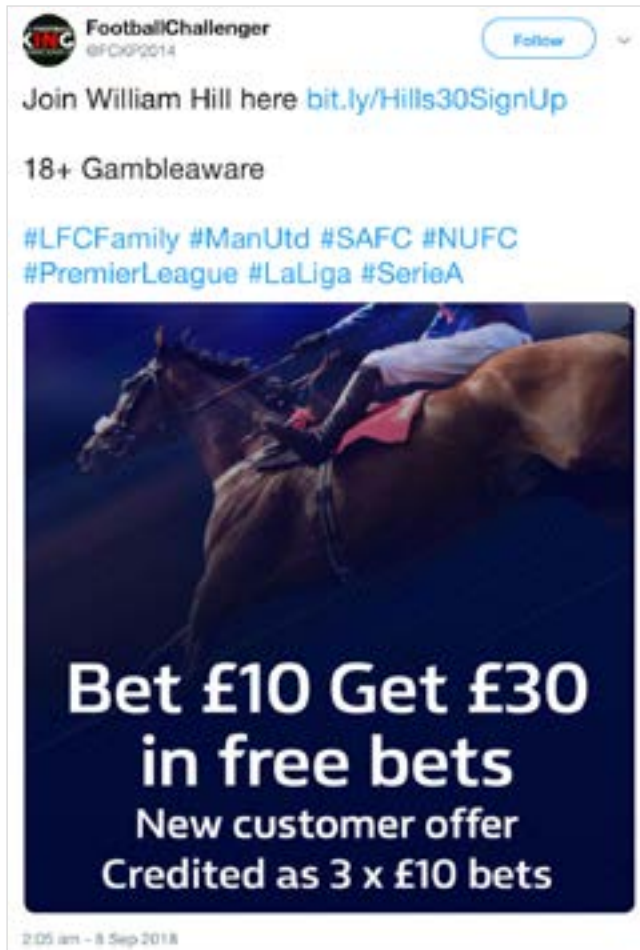
Fig 36: 🐦 Football Challenger Tweet

Trivialisation of gambling

In their February 2018 guide to the CAP gambling code ASA[21] made particular reference to the trivialisation of gambling and advised that advertisers should exercise caution particularly when encouraging people to take advantage of promotions to open accounts. In the traditional accounts we felt that 31% (n=74) did not exercise caution when encouraging people to

gamble or place bets. We defined 'exercising caution' as the inclusion of at least one responsible gambling message such as "BeGambleAware", "T&Cs apply" or "18+". It was also notable that whilst it tended to be the smaller advertisers that did not exercise caution it was also sometimes big operators. The Tweet from the Matched Betting Blog makes a 188BET offer for the World Cup with no cautions attached at all and the Coral tip for Goodwood (whilst not a call to open an account per se) equally contains no cautions.

Fig 37: 🐦 Matched Betting Blog Tweet

Fig 38: 🐦 Coral Tweet

Encouragement to gamble regularly

Another aspect of not trivialising gambling highlighted by the CAP guidance document is that gambling on a regular, repeated or normalised basis should not be encouraged and nor should advertising encourage people to gamble more than they would otherwise. 13% (n=31) of traditional adverts encouraged regular or more than normal gambling. For example, BetandSkill's advert encourages viewers to "find our free daily tips," Freebigbets promotes Paddy Power's offer of a £10 Free Bet Every Week and MBPRO promises monthly winnings.

Fig 39: 🐦 BetandSkill Tweet

Fig 40: 🐦 Freebigbets Tweet
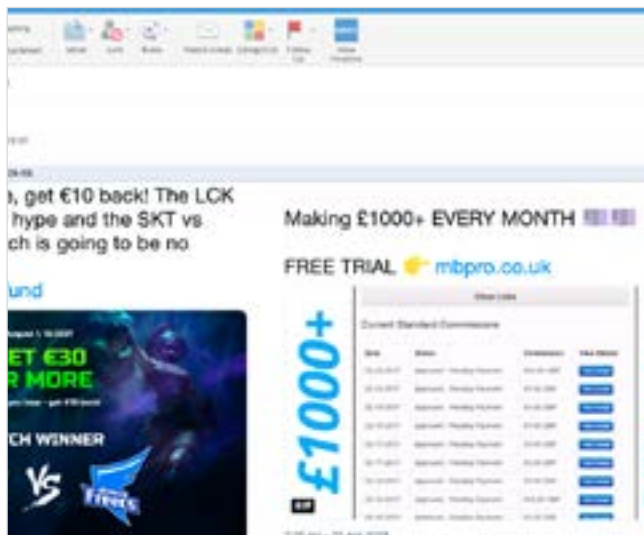
Fig 41: 🐦 Freebigbets Tweet

Regulatory issues concerning children – of particular appeal

Protecting children is of the utmost concern to regulators with new guidelines issued by ASA in February 2019[22]. Yet 21% (n=51) of traditional adverts were found have regulatory issues concerning children mainly around the use of images that, in our view, would be appealing to children. For example, the UK Casinos Casino8 account sent a Tweet using a cartoon picture of popcorn to promote 32Red Casinos and a unicorn to advertise free play on mobile slots games. The BetandSkill offer for Gala Casinos meanwhile uses a cartoon character, treasure and rainbows, the type of imagery with which ASA has been strict, and Bet Ginger uses a picture of a child with the instruction "Go To This Website a lot of FREE MONEY On IT." It is our view that these images are likely to be of particular appeal to children and young people.

Fig 42: 🐦 UK Casinos tweet

Fig 43: 🐦 UK Casinos Tweet

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Fig 44: BetAndSkill Tweet

Fig 45: BetGinger Tweet

CAP CODE AND ESPORTS ADVERTISING TWEETS
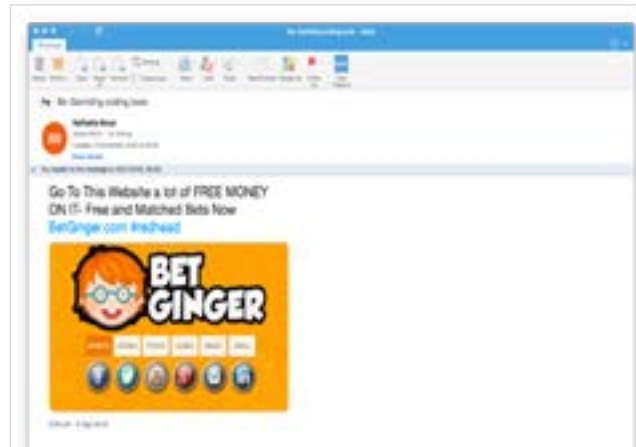
esports gambling appears to be very under-researched, and is not specifically addressed in any of the regulations to date. Of particular importance is that, as we have already noted, only 2% of esports adverts in our sample attached any sort of warning message to the Tweet and 74% of them had some regulatory concern. Beyond that the concerns were of a different nature to those encountered from traditional accounts. Fewer esports advertisers presented complex and confusing betting odds, encouraged regular gambling or emphasised the monetary benefits. Instead there were issues with late-night gambling, particular appeals to children, "bet now" type messaging and potential for misinterpretation of betting in crypto currencies. It may be that esports operators do not see the Tweets they send as advertising and thus have not sought out regulatory advice. As the mainstream bookmakers, affiliates and tipsters move into the esports space this may change and as physical sports teams such as Paris Saint Germain also sponsor esports teams the business

and betting arrangements of the two worlds may begin to merge and overlap. In the meantime esports betting is an area that may require some attention from the regulators.

Emphasising monetary benefits – mainly for cryptocurrency betting

Compared with 34% of Tweets from traditional accounts only 5% (n=9) esports Tweets had a strong emphasis on monetary benefits. These tended to be for cryptocurrency betting such as the CSGOatse promotion, "NOW you can earn more free coins by flipping the coin," or Tipify's, "Win free bets by leaving tips on esports matches! Your predictions can turn to bitcoins in an instant so make those tips count!" As we shall see in the content marketing section, these Tweets also often contained instructions on how to bet e.g. "learn how it works and join now."

Fig 46: CSGOatse Tweet

Fig 47: 🐦 Tipify Tweet

Susceptibility or inexperience of young or vulnerable people – exaggerated statements

Whereas 37% of traditional Tweets were deemed to exploit the susceptibility or inexperience of young or vulnerable people this applied to only 6% (n=10) of esports Tweets. And whilst traditional Tweets used the promotion of complex odds that could confuse, esports Tweets tended instead to make more general exaggerated statements that could be misinterpreted by inexperienced young people such as X-Bet's claim that, "A successful person never loses … they either win or learn!" or Nitrogen esports claim that "Sweet #CSGO and #Dota@ skins are being given away! Free bets are also up for grabs!"
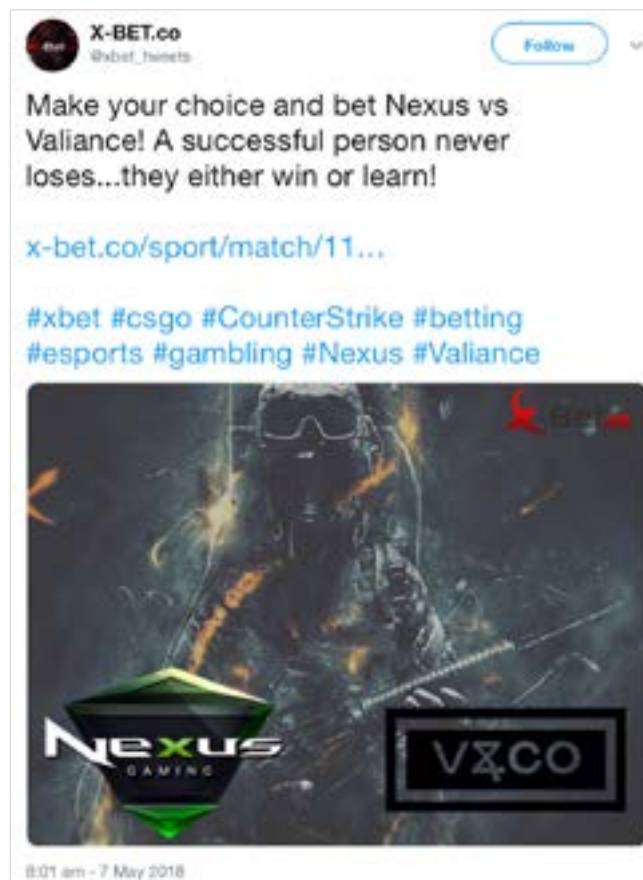
Fig 48: 🐦 X-BET.co Tweet

Fig 49: 🐦 Nitrogen Esports Tweet

Encouraging betting at unsociable times

As noted in the computer-aided content analysis above, a person gambling late at night and/or alone is less likely to be in a position to act with restraint. For this reason advertisers are advised not to promote gambling in these situations. However, we found that 17% of esports Tweets encouraged betting late at night or in the early hours of the morning. For example Tipify advertised betting on three Overwatch games taking place at 23.00, 01.00 and 03.00 UK time. It should be noted that the three biggest centres for esports tournaments are USA, China and South Korea all countries with a large time difference from the UK. The times of these matches clearly cannot be altered but advertisers could be required, for example, to include a cautionary warning to those tempted to place bets at these unsociable times.

59% of esports adverts raised, in our view, regulatory issues concerning children. The CAP guidance document of February 2018[23] stated that "new provisions will … restrict ads that create an inappropriate sense of urgency." The was in fact the biggest issue we discovered in our sample of esports Tweets. For example, X-Bet in three separate Tweets urges recipients to "Hurry up to bet on OpTic Gaming vsEvil Geniuses" and in the promotion of bets on another DOTA2 match, "Don't miss your chance to win and bet with X-Bet. co!" or "Fantastic match – Fnatic vs OpTic Gaming Watch this game and bet on X-Bet.co!

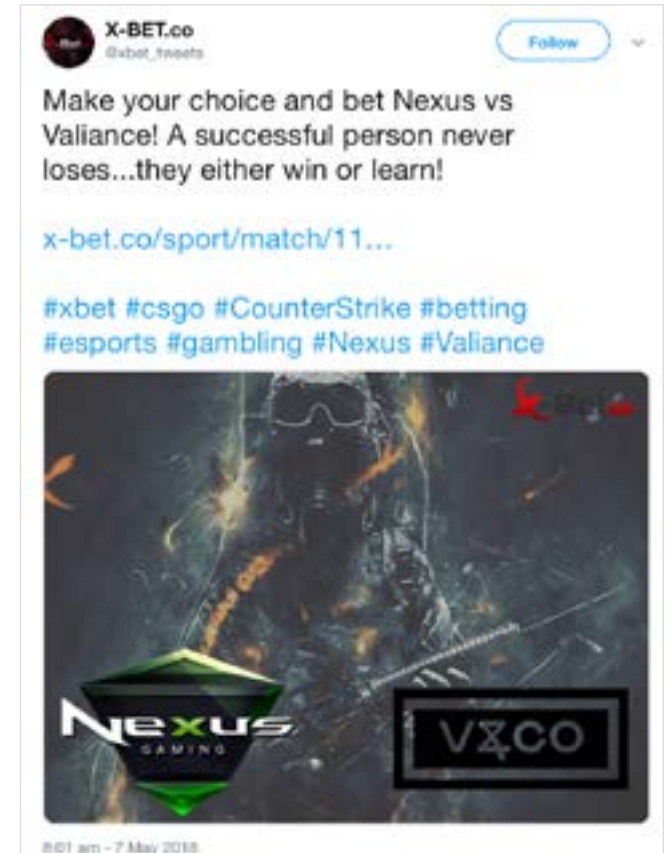Fig 50: Tipify Tweet

Fig 51: X-BET.co Tweet

Fig 52: X-BET.co Tweet

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Although we did not code in-game betting, which by its nature entails an urgent appeal we did record some examples of this such as Fusion Bet's Tweet during an Overwatch tournament that urges, "The Overwatch esports are still going strong! We're having a great match with amazing odds coming up!"

Fig 53: 🐦 Fusion.bet Tweet

Regulatory concerns relating to children – of particular appeal

esports adverts also raised issues not only around the age of the people and characters in the Tweets as discussed above but whether or not they were of particular appeal to children. 59% of these Tweets appeared to us to appeal to children because of the use of cartoon characters and animated style but it should also be noted that for 42% of the esports Tweets coders we were unsure whether or not they appealed to children. Examples include an image of a young female warrior riding a dragon in X-Bet's Tweet on EVOS esports and the pink princess like figures used by LoL Betting.

Fig 54: 🐦 X-BET.co Tweet

Fig 55: 🐦 LoL Betting Tweet

Advertising conclusion

Overall, the tone and content of both traditional and esports Twitter adverts raise a range of substantial issues in relation to age and gender portrayed, emphasis of money motives, encouragement of regular gambling, gambling at anti-social times, complex betting odds, urgency to gamble and appeals to children.

CONTENT MARKETING TWEETS

Our second subsample of Tweets contained content marketing rather than direct advertising. Content marketing aims to engage and quickly expand a target audience, building long term brand loyalty that will ultimately lead to the profitable placing of bets. It is a more subtle type of advertising which is likely to appeal quickly and implicitly via emotions rather than deliberatively and explicitly via any rational decision making process. The way in which this type of advertising is processed is not likely to be conscious and the recipient is therefore unlikely to be in a position to make a mental counter-argument[24].

As far as we are aware no content analysis of content marketing has been conducted before – and certainly not in the context of gambling marketing. With no precedents, this analysis is therefore exploratory in nature. To create some comparability with the advertising Tweets we grouped the items in our content marketing codebook into the same three themes 1) Design Features, 2) Topical Associations, 3) Messages about Gambling Behaviours and Resultant Outcomes. However, Design Features was rather different in nature to our analysis of advertising Tweets as it included elements of the Tweets specifically related to shareability such as use of gifs, memes, hashtags and tagging as well as the use of specific emotions. It should be noted that there is a literature on shareability in social media – but a review of this entire literature was well beyond the scope of this project.

Design features

Pictures, videos and GIFs

Static pictures was the most common format, used in 75% (n=129) of traditional and 69% (n=131) of esports content

marketing Tweets. Video was used in 15% (n=26) of traditional and 17% (n=32) of esports. We recorded the use of gifs also as research suggests that these are related to shareability[25]. Gif (Graphics Interchange Format) is a technical term referring to a computer image file format that allows pictures (including moving pictures) to be easily shared electronically. The format allows images to be shown on a loop which has become a popular way to encourage sharing[26]. Almost twice as many esports Tweets used these (15%: n=28) than traditional Tweets (9%:n=16) perhaps reflecting the young audience of esports.

When esports operators used video this was often to show an expert play a game such as betway esports depiction of the play by Faze – an American esports organisation that sponsors teams to play in a range of games including Call of Duty and CSGO.

Fig 56: betway esports Tweet

On closer inspection of these videos, we found some quite violent content, such as this one from Pinnacle esports. https://twitter.com/PinnacleEsports/status/1058445858071609345/video/1

Memes and in-play screenshots – very common in esports

We also noticed that memes and screenplay shots were particularly used by esports operators and so quantified their uses. The term "meme" was coined by Professor Richard Dawkins[27] to refer to a unit of cultural inheritance that is imitated and then spreads, often like a virus. These have been widely adopted in social media and were particularly adopted in esports gambling content marketing with 22% (n=42) using memes in comparison with only 8% (n=14) of traditional content marketing Tweets. 16% of esports operators posted gameplay screenshots in their Tweets, a technique not used at all by the traditional accounts for obvious reasons.

	esports	Traditional
Picture	69%	75%
Video	17%	15%
Gif	15%	9%
Meme	22%	8%
Gameplay screenshot	16%	0%

Table 22: Type of content

Bright Colours – not a feature

It has been suggested that bright colours help shareability but this did not seem to be a particularly widespread technique in gambling content marketing with 15% (n=25) of traditional accounts and only 7% (n=14) of esports operators using these. We noticed that esports use particularly dark colours reflecting the kinds of video game worlds represented in the tournaments. Emojis were used by 53% (n=91) of traditional and 35% (n=67) of esports content marketing Tweets.

Brand community – range of techniques

Creating a brand community is a big part of engendering loyalty. Design features to encourage this include hashtags, tagging, Retweeting and encouraging participation. The techniques used by the traditional gambling operators differed from the esports gambling Tweets. 34% (n=58) of traditional Tweets used none of these techniques compared with only 13% of esports. Half of traditional operators used hashtag only with only 1% Retweeting. Fewer than a fifth of esports operators on the other hand used hashtags instead using mixed methods and (23%:n=44) tagging (27%:n=52).

	esports	Traditional
None	13%	34%
Hashtag	19%	50%
Tagging	27%	1%
ReTweeting	13%	1%
Call to participate	5%	10%
Mixed Methods	23%	4%

Table 23: Type of techniques used in Tweets manually coded

Almost a fifth of traditional gambling operators used celebrities in their community compared with only 6% of esports operators. Celebrities were also sometimes tagged.

	esports	Traditional
Celebrity Featured	6%	19%
Celebrity Tagged	1%	5%

Table 24: Celebrity appearances in Tweets manually coded

In the case of esports, the celebrity may well be under 25 which is in contravention of the CAP/BCAP Code as in the Tweet from betway esports featuring a 20 year old CSGO player.

Fig 57: 🐦 betway esports Tweet

The role of emotions in content marketing

Our codebook included 43 different emotions that have been used in previous research to understand catalysts to sharing social media content; but in fact we found that a very small range of emotions was used.

Emotions evoked	esports	Traditional
Amusement	36%	75%
Surprise	20%	15%
Admiration	0%	14%
Gloating	0%	5%
Insider/expert Sentiment	85%	56%

Table 25: Emotions evoked in Tweets manually coded

In Tweets from bookmakers, affiliates and tipsters amusement, surprise and admiration were the emotions evoked by most of the Tweets. Gloating was also used to some extent when appealing to fans of one team that had just defeated an arch rival. 75% of these Tweets in our view caused amusement such as the one from Paddy Power showing Jose Mourinho/ Alan Partridge. Surprise and admiration were also evoked (15% and 14% respectively) for example Paddy Power's publicity stunt to pay £10,000 to LGBTQ+ charities each time Russia scored a goal in the World Cup to draw attention to Russians' alleged homophobia or 188BET's picture of the ongoing antics of Ibrahimovic. Gloating was used only in traditional Tweets (5%) such as Bet365's one showing Steven Gerrard the new manager of Rangers with a wry smile after beating Bury in a way his ex-club Liverpool were unable to emulate; or Coral's jibe at the German team.

Fig 58: 🐦 Paddy Power Tweet

Fig 59: 🐦 Paddy Power Tweet

Fig 60: 🐦 188BET Tweet

Fig 61: 🐦 bet365 Tweet

Fig 62: Coral Tweet

Fig 63: betway esports Tweet

Fig 64: betway esports Tweet

Emotions in esports – "insider sentiment" most widely used

For esports amusement and surprise were also prevalent whilst admiration and gloating were not used at all. By far the most extensively used technique used to elicit engagement in esports content marketing was what we have called 'insider sentiment' or the use of an 'in joke' or niche expert information to enhance the recipient's feeling of belonging to a special club or in-group. 85% of its content marketing appealing to insider sentiment as can be seen below where betway esports use a range of gifs and memes to fuel this.

Fig 65: 🐦 MoneyMatches Tweet

Most popular content

The computer aided analysis of Twitter advertising highlighted the 10 most popular Tweets. We explored these and found that they all use a mix of the design features described here such as GIFS, memes, humour and insider sentiment to achieve their success. For example Paddy Power gained over 26,000 Retweets for content highlighting that Besiktas were fined £29,800 for letting a cat onto the pitch yet only £22,000 for racism. In another with over 18,000 Retweets, Paddy Power created a spoof text exchange between an Arsenal supporter and Stoke fan. It should be noted that despite the humorous and gloating content of this is not suitable for under 18s.

Topical references

96% (n=164) of traditional and 94% (n=179) esports content marketing Tweets were related to sports or esports. These Tweets often contained news or facts informing viewers of upcoming matches, results, team-changes or stories about famous players. As seen above this is often done using humour. Sometimes the news is presented during a match as a "second screen" with in-match commentary such as this "GOAL!" Tweet from Coral during the West Brom vs Bolton Match in August.

Fig 66: 🐦 Coral Tweet

Beyond that 83% (n=143) of traditional and 56% (n=107) of esports Tweets related to a specific event or match. This is important as problem gamblers are more likely to be tempted to gamble when a specific, tangible event – that clearly has a limited time opportunity - is presented. We found a number of examples of traditional bookmakers using content marketing to highlight a match and then following up perhaps a couple of hours later with invitations to bet. Bet365 used this technique both in Premier League matches and the World Cup.

Fig 67: 🐦 bet365 Tweet

Fig 68: 🐦 bet365 Tweet

Messages about gambling and resultant outcomes

74% of esports and 68% of traditional advertising Tweets had some sort of regulatory concern with regard to the messages about gambling and/or the possible resultant outcomes, this was not the case with content marketing. The regulatory concerns were quite specific realting to images that appeared to have particular appeal to children and the use of under 25s in Tweets. As professional esports players are predominantly in this age group this is of little surprise but does pose regulatory issues for the way in which gambling operators promote their services in this sphere.

Particular Appeal to Children – more common in esports

For content marketing, the concern revolved solely around the possible particular appeal to children and the depiction of individuals who are under 25. This issue was much more prevalent in esports Tweets than in content marketing from traditional accounts. 93% (n=159) of traditional content marketing did not have particular appeal to childen whilst 1 Tweet did and coders were unsure about 6% (n=11). On the other hand 37% (n=71) of esports Tweet appeared to have particular appeal to children, for example the cartoon image used by MoneyMatches. Coders were unsure about a further 24%.

Fig 69: 🐦 MoneyMatches Tweet

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Featuring under 25s – in almost a quarter of esports content marketing

None of the content marketing from the traditional bookmakers or tipsters accounts featured pictures of individuals under 25 but 24% (n=45) of Esports Tweets did so. This was often the featuring of players – many of whom are verifiably aged 24 or less. The posts by Unikrn, an organisation that specialises in esports gambling, about the Cloud9 and G2 Esports teams are examples.
These are clearly in breach of the regulations.

Fig 70: Unikrn Tweet

Fig 71: Unikrn Tweet

Fig 72: Team eBetFinder Tweet

Fig 73: 🐦 ArcaneBet Tweet

Fig 74: 🐦 X-BET.co Tweet

Operators also used children and babies in gifs, memes and other visual content. Examples include a pre-schooler and a primary school child shown gaming in a Tweet from Team eBetFinder; a baby posted by Arcanebet; and X-Bet's inclusion of a child playing Fortnite the game that has 200 million players and that is rated 12.

Content Marketing Conclusion

As far as we are aware, a content analysis of content marketing has not been attempted before and certainly not in the context of gambling advertising on Twitter. In this first exploration, we have identified some of the design features used to promote shareability such as memes, GIFs, humour, surprise, admiration and insider sentiment and noted differences in the techniques used by traditional gambling organisations and those associated with esports. In particular a quarter of all content marketing for esports features under 25s, in breach of CAP Code 16.3.14 and the ASA's further guidance document[28]. Beyond that images used in this content are very likely to be of particular appeal to children although the subjectivity of this regulation may need to be revisited given that the average esports gamer is under 30.

Content marketing is not designed to elicit immediate betting but it does serve to build strong affinities with particular gambling organisations which over time can create very positive associations with gambling in the minds of young and vulnerable people. These associations are built implicitly, making them hard to consciously resist.

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Conclusions

The scale and character of Twitter-based gambling activity revealed in this report raises important questions for regulators, social media companies and the gambling industry. It shows that children and vulnerable groups are active in conversations around gambling, regularly consuming and sharing highly visual advertising. It shows new types of content arising, particularly around betting on esports, which are likely to be more appealing to children and young people, and which make almost no reference to the risks associated with gambling.

In order to tackle these problems, existing regulations around access to gambling advertising need to be clarified and enforced. Where technical tools have been developed to restrict content based on age, these should be reviewed and applied; not only to the largest operators, but also to the less visible network of affiliates and tipsters sharing often huge quantities of content online.

Further, the proliferation of promotions likely to appeal to vulnerable groups - particularly involving 'free' and 'matched' betting - needs to be urgently examined, and the effects of this messaging on people's gambling behaviour understood. Beyond this, the promotion of money motives for gambling as well as encouragement to make gambling a regular habit needs to be addressed. Two areas that require immediate attention are the use of under 25s in esports advertising and the clarification of the subjective "particular appeal to children" regulation in the context of the young demographic of the esports audience.

To achieve this, it is vital that regulators ensure that they are able to measure and understand the developing landscape of online discussion, and respond to new forms of gambling. Otherwise, damaging content, and its impact on children and vulnerable groups, is likely to remain prevalent but undetected - hidden in plain sight.

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6   Details available here: **developer.twitter.com/en/docs/tweets/timelines/api-reference/get-statuses-user_timeline**

7   Note – a 'NAP' is a piece of betting terminology meaning 'an almost complete certainty'. According to Wikipedia, the term is derived from the card game 'Napoleon'

8   Classification of natural language is an inherently probabilistic process, and no classifier of this type will be 100% accurate. Where a satisfactory level of accuracy cannot be reached, classifiers were retrained or discarded entirely. All classifiers trained for this report were given an overall accuracy of between 72% and 91%, with an average accuracy of 81%. A full description of the classification process, along with accuracy scores for each classifier, is contained within a full methodology report, available from the authors.

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