



# **GAMBLING INDUSTRY CODE FOR SOCIALLY RESPONSIBLE ADVERTISING**

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## **GAMBLING INDUSTRY CODE FOR SOCIALLY RESPONSIBLE ADVERTISING**

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1. The Industry Code for Socially Responsible Advertising (the 'Industry Code') was originally introduced on 1 September 2007. Its aim was to provide gambling operators with a range of measures that would enhance the social responsibility of their advertising and which went over and above the extensive requirements already placed on them by the gambling and advertising regulators.

2. It was always envisaged that the Industry Code would be reviewed and the Industry welcomed the Government's decision in 2014 to initiate a review of all aspects of the regulation of gambling advertising.

3. As part of that process, on 28th February 2014, the then Secretary of State at the Department for Culture, Media and Sport (DCMS) wrote to the Remote Gambling Association (RGA) to request a review of the Industry Code: 'to ensure that controls keep pace with developments in the market, and continue to reflect public attitudes towards gambling advertising'.

4. Following this review and subsequent engagement with DCMS, a number of improvements and additions were made to the Code. A commitment was also given by IGRG to review the Code on a regular basis. This led to further amendments being made in the Third Edition and they came in to force at the end of 2017. The changes related to further measures around social media; and references to GambleAware in advertising being changed to BeGambleAware. The Fourth Edition included a new requirement for a safer gambling message or a reference to [begambleaware.org](http://begambleaware.org) (see paragraph 26-30 for details) to appear throughout the length of television advertisements. This change was part of a wider package of gambling advertising regulatory reforms flowing from the Government's Triennial Review (2017-18). The Fifth Edition contained changes relating to additional restrictions relating to betting advertising on television before the 9.00pm watershed.

5. This Sixth edition includes amendments to the Code resulting from the need to further advance new requirements designed to better protect children and vulnerable consumers online. These changes come into effect 1<sup>st</sup> September 2020.

### **Origins and role of the Industry Code**

6. The Gambling Act 2005 amended some of the longstanding advertising restrictions. For example, for the first time it permitted television advertising for all forms of gambling. Before that only very few types of gambling such as bingo and the National Lottery could be advertised in this way. This change reflected the then Government's often repeated position that gambling had become a mainstream leisure activity.

7. However, implementation of the Act and the new advertising provisions did not take place until September 2007. In the intervening period concerns were expressed by Ministers about the potential risks of the new, more liberal, advertising regime and questions were raised about possible regulatory gaps. As the advertising freedoms were untested and there was little evidence about their potential impact, the gambling industry proactively offered to produce the Industry Code. It introduced a number of precautionary measures on that basis.

8. Among the more significant of these were (i) the 9.00pm television watershed for all gambling products except for bingo, lotteries and sports betting around televised sports events; (ii) the

requirement for advertisements to carry information about the Gamble Aware website; and (iii) the removal of sponsoring operators' logos from all children's merchandise, such as replica football kits.

9. Although the Industry Code provides a benchmark for the Industry, operators can and often do go beyond its requirements. The gambling industry has a responsibility to ensure that it takes all reasonable steps to minimise the extent of problem gambling and to prevent underage gambling from taking place. Socially responsible advertising is essential if that is to be achieved.

10. The Industry Code has been developed collectively by the gambling industry under the umbrella of the Industry Group for Responsible Gambling (IGRG) which is currently comprised of the Association of British Bookmakers; BACTA; the Bingo Association; National Casino Forum; and the Remote Gambling Association. IGRG was established in 2014 and incorporated in November 2015. Its mission is to provide a structure to better promote socially responsible gambling across all gambling sectors in the UK. Currently, due to changes in industry representation, the Betting and Gaming Council manage the IGRG Code, agreeing with the Bingo Association, Lotteries Council and BACTA on any changes to the Code.

11. It will continue to be the case that the principal rules governing gambling advertising in Great Britain will be those produced and administered by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP), which are adjudicated upon by the Advertising Standards Authority (ASA). Further information about those is provided below. It must be stressed that this code is designed to supplement, rather than repeat or supersede those rules, by providing industry standards in a very limited number of related areas, especially educational messaging, that are not covered by the CAP/BCAP rules.

### **Legislative, licensing & regulatory context**

12. Following implementation of the Gambling Act 2005, the primary responsibility for the regulation of advertising by gambling operators is shared by the relevant Secretary of State, the Gambling Commission, and the advertising regulatory bodies CAP, BCAP and the Advertising Standards Authority (ASA). Under the Gambling Act 2005, Ofcom, in consultation with the Gambling Commission, is responsible for setting, reviewing and revising standards for broadcast gambling advertising. BCAP exercises that role under delegation from Ofcom. The Gambling Commission may issue code of practice provisions on non-broadcast advertising. It has asked CAP to perform that function.

13. In deciding what provisions might be required the Gambling Commission has a duty to refer to the licensing objectives of the Gambling Act 2005. In relation to social responsibility in advertising the Gambling Commission will pay particular attention to the objective of 'protecting children and other vulnerable persons from being harmed or exploited by gambling'.

14. The Gambling Act 2005 also contains reserve powers (Section 328 refers) for the Secretary of State to make regulations to control forms of gambling advertising subject to the restrictions about broadcast advertising in Section 329. The Government has the option at any time of taking proposals to Parliament in order to implement this reserve power.

15. The Gambling (Licensing and Advertising) Act 2014 amended the 2005 Act with the primary effect of making it illegal for any operator not licensed by the Gambling Commission to accept bets from consumers in Great Britain.

16. One consequence of this is that almost all gambling advertising that is accessible in Britain is provided by operators licensed by the Gambling Commission.

17. Together the CAP/BCAP rules and the Industry Code ensure that gambling advertising in Britain is conducted safely, fairly, and in a socially responsible manner.

18. Further information about the CAP/BCAP rules can be found at [www.cap.org.uk/gambling](http://www.cap.org.uk/gambling) and the Gambling Commission's Licence Conditions and Codes of Practice are available at [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk).

### **General Principles**

19. Before the Industry Code moves on to address a number of specific issues, the following list contains general principles that gambling operators should take particular care to adhere to when they are developing and placing advertisements:

- they should comply with the CAP and BCAP rules;
- advertisements must be legal and not misleading;
- advertisements and promotions should be socially responsible as described in the CAP and BCAP rules;
- care must be taken not to exploit children and other vulnerable persons in relation to gambling activity; and advertisements should not be specifically and intentionally targeted towards people under the age of 18 through the selection of media, style of presentation, content or context in which they appear.

20. All advertisers and gambling operators should already be aware that it is an offence under Section 46 of the Gambling Act 2005 to invite a child or young person to gamble.

### **Social responsibility messaging**

21. The specific content of an advertisement is the responsibility of the gambling operator who is placing it. It is good practice to include social responsibility messaging in all forms of gambling where it is practicable to do so, however, it is a requirement of the Industry Code that messaging should appear on all broadcast media. Further details are set out below.

22. However, in terms of carrying an educational message, there is clear merit in having at least a degree of commonality. Some gambling operators already have their own messaging and will wish to continue with it. For those that do not there is limited evidence, certainly in Britain, of what form of words is most effective. However, in order to provide some guidance, the Gambling Commission listed the following in its consultation paper *Gambling Advertisements and impact on responsible gambling* (January 2007) as examples of messaging that had been used in other jurisdictions:

- Don't let the game play you
- Gaming – more than a game
- Bet with your head, but not above it
- If it's no longer fun walk away
- Have fun, but play it safe
- If you play with real dollars, play with real sense
- Winners know when to stop
- Know your limit and play within it
- Please play responsibly
- Gamble for fun, not to win.

23. This is not a prescriptive list and serves only to indicate the sort of messaging that might be appropriate.

24. Given the many different forms of advertising and the various media through which advertisements can be displayed, it would be impractical to be overly prescriptive about the presentation of the message (for instance through attempting to set out font sizes for every circumstance), but the aim should be to ensure that any educational messages are displayed in such a way as to come to the attention of those viewing the advertisement. The intent of these provisions is clear and gambling operators will be expected to comply with the spirit of this Industry Code.

25. If in doubt, gambling operators are recommended to seek the advice of their relevant trade association.

#### **Inclusion of [www.begambleaware.org](http://www.begambleaware.org) in advertising**

26. [www.begambleaware.org](http://www.begambleaware.org) is a website which provides information about gambling and particularly issues related to problem gambling. That information is there to provide a single resource for those seeking advice and guidance. It also provides links to specialist support and treatment for those who need it.

27. The website address (ie [www.begambleaware.org](http://www.begambleaware.org)) should be carried on all print and broadcast advertising where it is feasible, practical, and necessary to do so. It should be presented in such a way that it is clearly legible.

28. The website address is not required to be included where the name of the operator, the operator's brand or the name of the premises is used where the provision of facilities for gambling is not the sole or main activity undertaken under that name, or the manner or context in which such name is displayed is not designed to draw attention to the fact that facilities for gambling are provided.

29. Including the website address alone is sufficient to meet the basic requirement of this code, but where practical operators should consider using the words 'For more information and advice visit' before referring to the website.

30. The Second Edition of the Industry Code introduced additional requirements with regard to the prominence of [gambleaware.co.uk](http://gambleaware.co.uk) in adverts and they must also apply to the use of [begambleaware.org](http://begambleaware.org). They were:

- For television advertising that [gambleaware](http://gambleaware) must remain on the screen for at least 10% of the advert's length; and
- For print advertising that it should be clearly legible in proportion to the advertising script.
- For digital advertising it should be a minimum of 100px across

#### **Television advertising – Watershed**

31. The Gambling Act 2005 made it possible to offer a wider range of gambling advertising than was previously the case. The content of that advertising is largely governed by the BCAP codes (see above), but the gambling industry is acutely aware of the requirements of social responsibility, not least in relation to the protection of children.

32. It was because of this that the Industry Code required that new gambling products (NB not those, such as bingo and lotteries, that were permissible prior to 1 September 2007), should not be advertised on television before the commonly accepted watershed time of 9.00pm. For the avoidance of doubt, it is worth underlining here that the sponsorship of television programmes is classified as advertising (for a definition of advertising, see Section 327 of the Gambling Act 2005).

33. The exception to this rule was the advertising of sports betting around televised sporting events. For the purposes of this code sporting events do not include sports-themed entertainment programmes such as (but not exclusively) dancing and ice-skating competitions and quizzes.

34. However, the Second Edition of the Industry Code added further requirements which were that:

- pre-watershed television advertising cannot include sign-up offers which are targeted solely at new customers; and
- pre-watershed television advertising cannot make reference to other gambling products that would not normally qualify for pre 9pm exemption.

35. With regard to the second of these points, advertisers are also reminded that Clearcast, as the organisation that pre-clears all television advertising, included the following in its checklist which is used when adverts go through the clearance process: *'If the advertisement features a website URL and has links to licensed gaming (eg casino, poker etc) on that landing page, then a 56-code restriction will be given. This means the ad can only go on post 9pm as it will be classed as advertising gaming. To avoid this, any licensed gaming must be '2 clicks away' (i.e the home page is one click, the next page is the second click - where there can be links to licensed gaming)'*

36. The key aim of these provisions, and the broader concept of the 9.00pm watershed itself, is to have in place appropriate safeguards for children and young people. However, it has been accepted that since the Code was first produced in 2007 there has been a huge increase in the amount of televised sport and with it the opportunity for betting advertising to proliferate. Against this background it was decided that additional measures should be introduced in the Fifth Edition of the Code. These were that:

- The previous exemption for pre-watershed betting advertising around 'televised sports' is removed.
- The new pre-watershed exemption will be limited to the televised broadcast of live sports events.

37. In addition to this, no pre-watershed television betting advertising will be permitted during the period from five minutes before the event begins until five minutes after it concludes. This includes breaks in play, for example, the half time period in a football match. For multiday sporting events, such as Golf tournaments or Test Matches in Cricket, the five-minute period will begin at the start of each day's activity (ie in these examples there should be no advertising from five minutes before the first Tee off or first ball is bowled).

38. During this 'five-minute before until five-minute after' period betting companies cannot sponsor the relevant television programme (this type of sponsorship is commonly referred to as 'bumper sponsorship'). These provisions extend to the linear streaming of a televised live sports broadcast on to mobile devices or similar.

39. Because of their inherent links with betting, which is not the case with other sports, these particular pre-watershed restrictions do not apply to horseracing and greyhound racing (although the remainder set out elsewhere in this Code, such as the need to reference [begambleaware.org](http://begambleaware.org), will continue to apply).

40. For the avoidance of doubt, where live sports events begin before the 9.00pm watershed but continue after that time then these restrictions apply solely to that part of the broadcast that occurs before 9.00pm. In relation to timeshift channels, that carry a time-delayed rebroadcast of their

“parent” channel programming (commonly referred to as +1) these restrictions will not apply if the + broadcast is shown after 9pm.

### **Television advertising – responsible gambling messaging**

41. Concern has been expressed about the tone of some television advertising for gambling. The overall content, and therefore the tone, of gambling advertising is addressed in the BCAP Code and consequently there is only a limited role for the Industry Code to play in this area.

42. It is nevertheless socially responsible to ensure that, irrespective of the content of every advert, that each will contain a reminder of what might best be described as the need to act responsibly when gambling. As mentioned in the Social Responsibility Messaging section above, there are a range of recommended social responsibility messages, and this Industry Code requires that all gambling adverts on television must include such a message prominently. It has proved difficult to ensure an adequate consistency of approach in relation to how long safer gambling messages and references to [begambleaware.org](http://www.begambleaware.org) appear on screen. This has led to concerns that they are too frequently unnoticeable.

43. As a result of this, the 4th Edition of the Code contained an additional requirement which was that a safer gambling message or a reference to [begambleaware.org](http://www.begambleaware.org) must appear on screen throughout the length of the advert. That provision came into effect 30th June 2018. This did not affect the existing requirements related to the inclusion of [begambleaware.org](http://www.begambleaware.org) that are contained in paragraphs 26-30.

### **Television advertising – text and subtitling**

44. The first edition of the Industry Code was silent on the size and prominence of safer gambling messaging on television. It is now a requirement that the messaging in advertising follows the good practice set out in the ASA guidance, On-screen text and subtitling in television advertisement. Copies can be downloaded from: <http://www.cap.org.uk/Advice-Training-on-the-rules/Help-Notes/Onscreen-text-and-subtitling-in-TV-advertisements-note1.aspx#.VOHxPfm5nZY>

### **Radio - Messaging**

45. Radio advertising raises slightly different practical issues to television advertising. However, the Industry Code makes it a requirement for advertisers to include (i) a brief safer gambling message of the kind described in paragraph 22 above.; or (ii) a voiceover at the end which will refer listeners to [www.begambleaware.org](http://www.begambleaware.org)

### **18+ messaging**

46. It is a specific requirement (introduced in the second edition of the Code) that every television and print advert should carry clearly either a ‘18+’ symbol or a ‘no under 18s’ type message, except in the case where lotteries are being marketed. In the case of lotteries a comparable ‘no under 16s’ or ‘16+’ message should appear.

### **Online banner advertising**

47. It is not possible or appropriate to require that all online banner advertising should carry safer gambling messaging, but it is not unusual for such adverts to provide click-throughs to further product information. Therefore, the industry Code recommends that where this happens the landing page should provide a further click through to either (i) the operator’s own safer gambling microsite or web pages; or (ii) a generic source of information such as [www.begambleaware.org](http://www.begambleaware.org). For the

avoidance of doubt this provision does not apply to banner advertising on gambling websites themselves because they already provide links to safer gambling information.

### **Sports' Sponsorship**

48. The advertising of adult-only gambling products or product suppliers should never be targeted at children. This applies equally to sponsorship and this Industry Code continues to require that gambling operators do not allow their logos or other promotional material to appear on any commercial merchandising which is designed for use by children. A clear example of this would be the use of logos on children's sports' shirts. Children's shirts and other merchandise will be defined as those that do not attract VAT.

### **Sponsorship of television programmes**

49. The sponsorship of television programmes was not covered explicitly by the original Industry Code on the basis that such sponsorship is technically different from advertising and is, for example, subject to different regulatory controls by Ofcom which prevent any kind of sales message or call to action.

50. Nevertheless, in order to reinforce the consistency of the viewing experience, where sponsorship of a television programme takes place the Industry Code was amended to make it a requirement that the Gamble Aware website address should be included. Anything more than that may well fall foul of the Ofcom rules, but in any event its inclusion was a worthwhile addition to the Code. As with other references in the previous versions of the Code, the relevant GambleAware website is now [www.begambleaware.org](http://www.begambleaware.org).

51. However, the Fifth Edition of the Code did include an additional requirement relating to sponsorship of television programmes featuring live sport before the 9.00pm watershed. (see Section above on Television Advertising – Watershed)

### **Social media - marketing**

52. Marketing on social media is the responsibility of both the platform providers, such as Facebook, and the gambling operators themselves. The gambling industry through its Code can only seek compliance by the operators, but social media has grown in importance since the Industry Code was first established and it should now be extended accordingly.

53. It should also be remembered that the CAP Code already covers marketing on social media. Despite that, the Industry Code is designed to complement existing regulation of this kind and the following provisions were added in the Second Edition:

- All gambling operators should have on their corporate webpages (i) safer gambling messaging; and (ii) links through to sources of more detailed information.
- Account profiles for operators' branded websites on social media will also clearly carry '18+' symbols or a 'no-under 18s' type message as well as a reference to [www.begambleaware.org](http://www.begambleaware.org). In the case of lotteries, a comparable 'no under 16s' message should appear.

54. The Third edition of the Code added:

- A requirement that gambling operators carry the required social responsibility and age requirements on consumer-facing marketing content on their YouTube channels.

- A requirement that operators age restrict all direct marketing video uploads to YouTube. This can be done simply by ‘checking’ the age restriction option when uploading content via: <https://support.google.com/youtube/answers/2950063?rd=1>

55. This Sixth edition of the Code added:

- A requirement that sponsored/paid-for social media advertisements must be targeted at consumers aged 25+. This measure adds an additional level of assurance around the age of consumers where operators do not hold any first party data about the consumers targeted, (i.e. where operators are wholly reliant on self-certified third party data, which may not always be correct.) This requirement relates solely to prospecting campaigns where the targeted audience is not already verified through the operators own age verification processes. Given improvements in identification technology if a social media platform can verifiably prove that its age gating systems can prevent under 18s from accessing the gambling advertising content, then the Betting and Gaming Council, on the recommendation of operators and in consultation with other third parties, may consider whether to reduce the age filter to 18+.
- A requirement that organic YouTube content produced by an operator and operators’ own YouTube channels must be age-restricted to 18+ to ensure users log in to age-verified accounts in order to view content.
- A requirement that operators should undertake reasonable endeavours to exclude customers with an active self-exclusion or cool-off period and those who the operator has defined using its own method of assessment as a ‘higher risk’ customer, from its paid-for social media campaigns.
- A requirement that operators must use their own social media pages to post frequent safer gambling related information. It is expected that, in determining sufficient frequency, operators should take into account how active their own social media accounts are and act accordingly.
- In the case of lotteries, the age gating required would be 16+ rather than 18+.

### **Promoting consumer awareness**

56. There are a number of steps that consumers can take in order to minimise their exposure to gambling advertising across social media platforms. However, this information may not always be easily accessible in a collated format. This Sixth edition of the Code recognises that operators are well placed to provide this information to their customers. As such, this Sixth edition includes;

57. A requirement that each operator provides information on how to limit exposure to gambling advertising across social media platforms. It is for each operator to decide where best to situate this information or the industry may adopt a common landing page for this information, available to operators via a link from their web site. However, the expectation is that it should be easily accessible and sufficiently prominent. This list of instructions will cover the largest social media platforms.

### **Search activity**

58. This Sixth edition expands the scope of the IGRG Code to cover search advertising through the inclusion of a requirement that any search advertisements must clearly contain 18+ messaging in the ad copy, along with safer gambling messaging within the core ad format. In the case of lotteries, comparable 16+ messaging should appear.

59. Online search activity is based on 'keywords' which link to consumer's search queries. Search engines offer the ability to advertise against queries via keywords. In order to introduce an enhanced level of consumer protection, the industry will introduce a shared blacklist of negative keywords against which no gambling advertising should be served. This blacklist will include keywords which indicate vulnerability and keywords which relate to children amongst others. The blacklist will be collated by the Betting & Gaming Council. The industry keyword blacklist will be updated on a regular basis to ensure the list remains a robust control over the passage of time.

This Sixth edition of the Code includes;

- A requirement that operators incorporate the industry keyword blacklist into all relevant campaigns where applicable.
- A requirement that operators will ensure any revised blacklist is incorporated into relevant campaigns in a timely fashion.

60. For the avoidance of doubt, the requirements above shall also apply to any affiliate marketing carried out on behalf of an operator. The industry-wide list will also be submitted to online advertising platforms for incorporation into their current systems.

### **Affiliate activity**

61. The Gambling Commission are clear that operators will be held responsible for any marketing carried out by their affiliates. As such, operators are expected to ensure that all relevant Code requirements are also followed by their affiliate marketers. This Sixth edition of the Code seeks to build on this requirement to establish more robust controls. As such, this revision includes;

- A requirement for all affiliates to be subject to due diligence and PEPS/sanctions checks. KYC checks should also be conducted wherever relevant.
- A requirement for affiliates to comply with all relevant regulatory and legislative requirements including CAP's guidance on ensuring advertisements are obviously identifiable as such. In order to promote consistency, all relevant affiliate ads should be clearly and prominently marked '#ad'.
- A requirement for relevant affiliates to share safer gambling related content on a regular basis, with frequency to be pre-determined with each individual operator with whom that affiliate has an agreement.

62. Compliance with the above is expected to be managed by way of a contractual obligation to comply with a Code of Conduct for the affiliate party. Operators are expected to terminate relationships with affiliates who cannot/do not comply, preferably on a one strike and you're out rule.

### **Coverage of the code**

63. This Industry Code is designed to apply to all forms of advertising and all sizes of gambling operator. As this is an industry code it cannot be made mandatory but it will set a benchmark against which operators' commitment to social responsibility will be measured. Its success depends on the gambling industry adhering to its provisions and the aim must be for all gambling operators to comply with it.

64. The gambling industry will look to the Gambling Commission to assist it wherever it is appropriate to do so in encouraging compliance with this code and this is provided for in its Licence Conditions and Codes of Practice. (<https://www.gamblingcommission.gov.uk/PDF/LCCP/Licence->

conditionsand-codes-of-practice.pdf) where Ordinary Code Provision 5.1.8 states that '*Licensees should also follow any relevant industry code of practice on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.*'

65. The Industry Code therefore covers all forms of licensed gambling in Britain, including society lotteries. The current exception to this is the National Lottery whose licence does not carry the same requirement and which is presently excluded from the remit of the Industry Code.

66. Also, unless they portray or refer to gambling, the code does not apply to marketing communications for non-gaming events or facilities e.g. tenpin bowling or hotels that are in the same complex as, but separate from, gambling events or facilities.

### **Monitoring and review**

67. Complaints and breaches of the Industry Code are dealt with by the Betting and Gaming Council, which is also responsible for conducting periodic reviews of the Code at least annually. To date there have been no instances where an operator has not taken remedial action when a breach is judged to have occurred, but if that was to happen it is open to BGC to refer the case to the Gambling Commission so that they are aware of the issue. Any possible breaches of the Code should be reported to [adcodecomplaints@igr.org.uk](mailto:adcodecomplaints@igr.org.uk)

68. The focus of this Industry Code is on the more common forms of advertising, notably through print and broadcast media. However, it is apparent that technology is opening up new pathways to consumers. It is impossible to legislate specifically for each of them, but due to the potential for new developments in this area it is one which has been identified as a priority for monitoring. That will continue to be the case.

### **Checklist**

69. A checklist of the Industry Code's key requirements is at Annex A

## Annex A

### **Key requirements of the Industry Code: checklist**

1. Include reference to [www.begambleaware.org](http://www.begambleaware.org) in all print and broadcast adverts - para 27
2. [www.begambleaware.org](http://www.begambleaware.org) must be presented in accordance with the requirement - para 30
3. Television watershed: product restrictions - para 32
4. Television watershed: sign up offers and references to other products - para 34
5. Safer gambling messages within every television advert - para 39
6. Television advertising: minimum size of text - para 44.
7. Radio messaging – para 45.
8. Adult only messaging – para 46
9. Online banner advertising click-through – para 47
10. Sports' sponsorships restrictions - para 48
11. Sponsorship of television programmes, inclusion of [www.begambleaware.org](http://www.begambleaware.org) - para 50
12. Social Media marketing – paras 53-55
13. Promoting consumer awareness – para 57
14. Keyword blacklist – para 59
15. Affiliate activity – para 61