

Online gambling marketing: Are current regulations fit for the digital age?

Policy paper

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1. Executive Summary

Introduction

This paper looks at the underpinning evidence for and policy levers to restrict and better regulate gambling marketing and content online. This builds on GambleAware’s ongoing calls for watershed restrictions in broadcast advertising, restrictions on sport sponsorships, and for all marketing to include health warnings and effective signposting to support.¹

Gambling operators invest significant resources into online marketing because it works. This has resulted in children and young people (CYP) being exposed to harmful online gambling content before an age at which they can critically evaluate it. A precautionary approach that restricts online marketing should be adopted until gambling operators and online platforms can demonstrate online safety. Specifically, until they can clearly demonstrate how they can promote gambling without exposing under 18s to gambling content, an age restricted product. The UK government can mobilise numerous existing levers to prevent CYP from being exposed to gambling marketing and content, as seen in similar jurisdictions. While there is clear evidence that online marketing contributes to harm, implementing effective safeguards will require political commitment to modernise marketing regulations in line with the digital age.

Why further restrictions on gambling marketing and content online are needed

A range of recent evidence, such as the impact of influencers on CYP,² suggests the licencing objective of the 2005 Gambling Act to “protect children and other vulnerable people from being harmed or exploited by gambling” is not being met adequately by existing regulations.

- **CYP are being harmed through online marketing:** Gambling is an age-restricted product yet some children report feeling “saturated” by the amount of gambling content online.³ with online channels a key source of exposure among this group.⁴ Most children feel they don’t have control over the amount of content they see,⁵ whilst almost four in five agreeing that “nobody under the age of 18 should be exposed to content and advertising about gambling.”⁶ The way in which gambling is normalised is problematic,

¹ Gambling marketing in Great Britain: What needs to change and why?

<https://www.gambleaware.org/our-research/publication-library/articles/gambling-marketing-in-great-britain-what-needs-to-change-and-why/>

² Young people and gambling-related influencer content: Understanding exposure to and impact of gambling-related influencer content on young people and identifying potential strategies for change <https://www.gambleaware.org/our-research/publication-library/articles/young-people-and-gambling-related-influencer-content-understanding-exposure-to-and-impact-of-gambling-related-influencer-content-on-young-people-and-identifying-potential-strategies-for-change/>

³ Qualitative Research on the Lived Experience and Views of Gambling among Children and Young People <https://www.gambleaware.org/our-research/publication-library/articles/qualitative-research-on-the-lived-experience-and-views-of-gambling-among-children-and-young-people/>

⁴ Young People and Gambling 2024: Official statistics <https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-2024-official-statistics/vpg-2024-recall-of-gambling-adverts-and-promotion-recall-of-gambling>

⁵ Young people and gambling-related influencer content: Understanding exposure to and impact of gambling-related influencer content on young people and identifying potential strategies for change. <https://www.gambleaware.org/our-research/publication-library/articles/young-people-and-gambling-related-influencer-content-understanding-exposure-to-and-impact-of-gambling-related-influencer-content-on-young-people-and-identifying-potential-strategies-for-change/>

⁶ The Appeal of Celebrity Ambassadors to Children & Young People Aged 11-17. <https://www.gambleaware.org/our-research/publication-library/articles/sherbert-research-the-appeal-of-celebrity-ambassadors-to-children-young-people-aged-11-17/>

resulting in unrealistic expectations of gambling among CYP. For example, three in four children agree that gambling advertising makes gambling seem fun (76%) and/or harmless/risk-free (73%)⁷. This results in an increased interest in gambling,⁷ underage gambling,⁸ and gambling harms throughout the life course.⁹ With approximately 85,000 11–17-year-olds experiencing problems with gambling, more needs to be done.¹⁰

- **Harm to at-risk groups is being exacerbated by online marketing tactics:** Marketing has a greater impact on those already experiencing gambling harms. Sophisticated online targeting (e.g., targeting communities based on higher gambling frequency)¹¹ and the ease of gambling online (e.g., a single click to an app)¹² can easily drive harm among at-risk groups. This drives harm among communities that already bear a disproportionate burden of harm, including those from deprived communities and ethnic minorities, due to wider inequalities, discrimination, and marginalisation.¹³

Problem: The issues with current regulation of online gambling marketing and content

Currently, the responsibility for regulating online gambling marketing is distributed across multiple government bodies and regulators, with no clear oversight from one body. This is exacerbated by a regulatory framework that relies too heavily on self-regulation. Where external regulation is in place, the powers to penalise operators, platforms and advertisers not following the rules are currently extremely limited. Rules and regulations do not reflect the unique challenges presented by the “digital age” (e.g., a higher volume of content, enhanced data targeting and tracking capabilities, obscure algorithms), and are therefore not responsive to emerging concerns. Online safety interventions also need to go beyond regulation to improve education and media literacy among young people.

GambleAware policy ask

We are calling on the **UK Government to further restrict and better regulate gambling marketing and content online**. In the short term whilst wider regulations are put in place, it is crucial to **ensure that both online marketing and content are within scope of incoming recommendations from the cross-departmental Safer Gambling Messaging Group**.

⁷ The Appeal of Celebrity Ambassadors to Children & Young People Aged 11-17. <https://www.gambleaware.org/our-research/publication-library/articles/sherbert-research-the-appeal-of-celebrity-ambassadors-to-children-young-people-aged-11-17/>

⁸ Young People and Gambling 2024: Official statistics <https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-2024-official-statistics/vpg-2024-recall-of-gambling-adverts-and-promotion-recall-of-gambling>

⁹ Annual GB Treatment and Support Survey 2022

<https://www.gambleaware.org/our-research/publication-library/articles/annual-gb-treatment-and-support-survey-2022/>

¹⁰ 2024 Young People and Gambling Report. 1.5% of young people scored 4 or more on the DSM-IV-MR-J representing a young person experiencing ‘problems’ with their gambling. This equates to approximately 85,000 11–17-year-olds in England, Scotland and Wales (to the nearest 5,000).

<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/young-people-and-gambling-2024-official-statistics>

¹¹ High Court rules Sky Bet breached data laws to target problem gambler <https://i.gamingbusiness.com/legal-compliance/legal/high-court-sbg-breached-data-laws/>

¹² Using a Behavioural Risk Audit to identify harmful design features on gambling websites

<https://www.bi.team/publications/using-a-behavioural-risk-audit-to-identify-harmful-design-features-on-gambling-websites/>

¹³ Minority Communities and Gambling Harms, Quantitative Report: Lived Experience, Racism, Discrimination and Stigma <https://www.gambleaware.org/our-research/publication-library/articles/minority-communities-and-gambling-harms-quantitative-report-lived-experience-racism-discrimination-and-stigma/>

Solution: A multifaced approach to reduce gambling harm through a stronger regulatory system

There are a number of policy levers which would restrict exposure among CYP and better regulate online marketing and content.

- 1. Aligning and strengthening online safety regulatory powers and programmes:** To improve the efficiency and effectiveness of regulating online gambling marketing, a single government entity such as the Department for Science, Innovation and Technology (DSIT) needs to have oversight of online safety, with consideration given to expanding Ofcom's statutory oversight to explicitly cover online gambling advertisements and related content. This would ensure that regulatory enforcement is directly accountable and enforceable, rather than relying on voluntary compliance via self-regulation. Alternatively, the Advertising Standards Association (ASA) could be given a government sponsor to enhance its scope, monitoring and enforcement powers to effectively regulate billions of pounds of advertising spend. The government could also facilitate increased collaboration between the ASA and Ofcom.
- 2. Increasing action by online platforms:** Commercial entities that profit from online marketing and content should also be responsible for online safety. Online platforms can be held to greater account through introducing a requirement for "safety by design", such as a requirement to opt-in rather than opt-out of gambling content. This will place the onus on online platforms to give users greater control over what they engage in.
- 3. Ensuring existing government programmes on online marketing and content work towards reducing gambling harms:** The Online Advertising Programme (led by the Department of Culture Media and Sport - DCMS) and Online Safety Act (OSA; led by Ofcom) could place further emphasis on reducing gambling harms. In particular, both programmes need to increase action on the advertising by unregulated operators, namely those advertising gambling services that deliberately target individuals who have self-excluded via GamStop, directly promoting themselves as "not on GamStop".
- 4. Tightening existing self-regulatory measures:** Progress will be limited if self-regulation continues to be the preferred approach. However, the ASA could more effectively reduce exposure of age-restricted gambling content to CYP through altering the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code) to include further restrictions on who and what "appeals" to CYP and lowering the "25% rule". It will also be important to ground policymaking in the lived experience of children by setting up a bespoke panel of children to help interpret rulings.
- 5. Establishing a cross-government taskforce to explore targeted policies:** A taskforce is needed to convene expertise across government departments and regulators to identify, scope and prioritise targeted policies. Some examples of targeted efforts include mandatory signposting and health warnings or restrictions on specific channels and tactics (e.g., media targeting, influencer marketing, sports environments, social platforms) or content (e.g., inducements, higher-risk products, content marketing). Such

policies could be tested within a deliberative engagement event (e.g., citizen's assembly) ensuring the voice of the public is reflected within policy making.

Conclusion

Online gambling marketing and content saturates CYP's environment and increases their risk of gambling harm; children want and deserve to grow up in a world where they are not routinely exposed to gambling through marketing. The public has consistently shown support for stronger restrictions, reinforcing the mandate for decisive action. Efforts on this will also support a reduction of further gambling harm amongst those already experiencing problems.

This paper clearly sets out clear recommendations and the rationale for urgent action to be taken by the Government and other decision-making bodies to ensure gambling marketing and advertising regulation is fit for the digital age.

Report information

Acknowledgement

The authors would like to thank all the experts that met with us during the development, drafting, and reviewing of this paper. This included representation across academia, charities, advocacy groups/networks, and those with lived experience of gambling harms.

Report accuracy

This paper was mainly drafted between March to June 2025. Although every effort has been made to update the paper in light of new research and policy developments, some may have been missed due to the evolving nature of the online environment. Due to the complexity of the UK regulatory systems, there may be some inaccuracies in the responsible bodies and regulatory mechanisms available. To minimise this, the paper was peer-reviewed by numerous experts in gambling harms and in wider online marketing policy.

Commonly used abbreviations

AI = Artificial intelligence

ASA = Advertising Standards Authority

CAP code = UK Code of Non-broadcast Advertising and Direct & Promotional Marketing

CYP = Children and Young People. This report defines children as those up and including the age of 17 who cannot legally gamble on most types of gambling, with young people aged 18-24.

DCMS = Department for Culture, Media and Sport

DHSC = Department of Health and Social Care

DSIT = Department for Science, Technology and Innovation

EU = European Union

GB = Great Britain

Ofcom = Office of Communications

OSA = Online Safety Act

PGSI = Problem Gambling Severity Index

UK = United Kingdom

2. Introduction

2.1 Introduction to GambleAware

GambleAware is the leading independent charity tackling gambling harms across Great Britain (GB). The charity is the most recognised brand in this space and the GambleAware website offers a seamless support journey for people experiencing gambling harm. Across GB over 3 in 5 (61%) adults are aware of the brand and over 2 in 3 (67%) of these would search GambleAware for advice, tools and support.¹⁴ GambleAware is working with the future commissioning system to ensure these critical assets are included as part of the smooth transition to the future system.¹⁵

Gambling harms are a serious public health issue which can affect anyone, and the prevention of harm cannot succeed without changes to the wider environment. GambleAware has developed this policy paper in line with a public health approach to addressing gambling harms.

2.2 Introduction to gambling harms

Official statistics from the Gambling Commission¹⁶ show that an estimated 2.7% of adults in GB, over 1.4 million,¹⁷ are experiencing ‘problem gambling’ (Problem Gambling Severity Index (PGSI) score of 8+),¹⁸ with separate estimates from GambleAware suggesting that up to 4.1 million adults in GB may be negatively impacted by someone else’s gambling.¹⁹ Many are experiencing harm before the age of 18, with 2.2 million children estimated to be living in households where an adult is experiencing ‘problem gambling’^{ibid}, and approximately 85,000 children aged 11–17-year-olds experiencing problems with gambling themselves.²⁰

The impact of gambling can be significant and may damage health and wellbeing. It creates serious risks of financial difficulties, breakdown of relationships, mental and physical health

¹⁴ GambleAware Brands Tracker 2025. Report not publicly available. Data from online survey of 3,022 individuals aged 16-65 in GB.

¹⁵ GambleAware's National Prevention Programme Assets

<https://www.gambleaware.org/media/ccwv5ml/national-prevention-programme-assets-summary-may-2025.pdf>

¹⁶ Gambling Survey for Great Britain - Annual report (2024): Official statistics

<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/statistics-on-gambling-participation-annual-report-year-2-2024-official>

¹⁷ Estimates of the population for the UK, England, Wales, Scotland, and Northern Ireland 2024.

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesScotlandandNorthernIreland>

¹⁸ Problem gambling screens: <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/problem-gambling-screens>

¹⁹ GambleAware Annual GB Treatment and Support Survey 2024. <https://www.gambleaware.org/our-research/publication-library/articles/annual-gb-treatment-and-support-survey-2024/>

²⁰ 2024 Young People and Gambling Report. 1.5% of young people scored 4 or more on the DSM-IV-MR-J representing a young person experiencing ‘problems’ with their gambling. This equates to approximately 85,000 11–17-year-olds in England, Scotland and Wales (to the nearest 5,000).

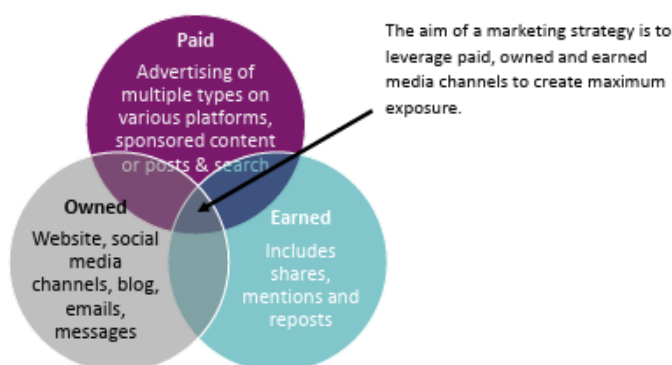
<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/young-people-and-gambling-2024-official-statistics>

problems, and sadly in some cases, suicide.²¹ Harms are often suffered not just by those who gamble, but by friends, family²² (often referred to as affected others) and wider society²³.

Gambling harms also contribute to wider health inequalities.²⁴ People in the most deprived areas are more than twice as likely to experience ‘problem gambling’ compared to those in the least deprived,²⁵ while religious and ethnic minority communities are also disproportionately more likely to be affected.²⁶ This is not the fault of these groups but is rather a reflection of wider social inequalities that increase the likelihood of using gambling to cope with broader structural challenges (e.g., discrimination, social exclusion, financial hardship).²⁷ Effective prevention will help counter these inequalities and support ambitions to tackle the cost-of-living crisis and grow the economy.²⁸

2.3 Introduction to online marketing

The definition of online marketing used in this paper is “the use of digital channels to market products and services in order to reach consumers.”²⁹ Online marketing is often designed to be shared by users of platforms to easily extend the reach. This online “word of mouth” helps increase credibility of gambling brands, but gives organisations much less control of the reach of earned and owned media.³⁰



²¹ Gambling-related harms evidence review: summary

<https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary--2>

²² Annual GB Treatment and Support Survey 2023

<https://www.gambleaware.org/our-research/publication-library/articles/annual-gb-treatment-and-support-survey-2023/>

²³ The Fiscal Costs and Benefits of Problem Gambling: Towards Better Estimates

<https://niesr.ac.uk/publications/fiscal-costs-benefits-problem-gambling?type=report>

²⁴ Gambling-related harms evidence review: summary

<https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary--2>

²⁵ GambleAware Annual GB Treatment and Support Survey 2024. <https://www.gambleaware.org/our-research/publication-library/articles/annual-gb-treatment-and-support-survey-2024/>

²⁶ Minority Communities & Gambling Harms, Qualitative and Synthesis Report: Lived Experience, Racism, Discrimination and Stigma

<https://www.gambleaware.org/our-research/publication-library/publication-library/minority-communities-gambling-harms-qualitative-and-synthesis-report/>

²⁷ Gambling Harms and Coping with Marginalisation and Inequality: Marginalisation, Isolation and Criminalisation in Great Britain

<https://www.gambleaware.org/our-research/publication-library/articles/gambling-harms-and-coping-with-marginalisation-and-inequality/>

²⁸ How can the next government take prevention from rhetoric to reality?

<https://www.health.org.uk/publications/long-reads/how-can-the-next-government-take-prevention-from-rhetoric-to-reality>

²⁹ What is digital marketing? <https://terakeet.com/blog/digital-marketing-channels/>

³⁰ An End to Junk Food Marketing Online: Policy Position

<https://obesityhealthalliance.org.uk/wp-content/uploads/2020/11/Ending-junk-food-marketing-online-position-paper.pdf>

Discussions on online marketing can often focus on paid-for social media but there are a broad array of online channels and tactics which can be challenging to group and even define. For example, it can include:

- Social media (e.g., Meta, X, Snapchat, TikTok)
- Streaming services (e.g., YouTube, Twitch).
- Messenger apps (e.g., WhatsApp, Telegram)
- Audio streaming platforms (e.g., Spotify, Audible)
- TV streaming platforms (e.g., Amazon prime, ITVX)
- Direct (e.g., email, SMS)
- Display (e.g., embedded banners or pop ups on any website)
- Operator estate (e.g., website, app, notifications)
- Search (e.g., Google, Safari)
- Sponsored content (e.g., news articles, blogs, affiliate sites, podcast readouts)
- Partnerships (e.g., cross-promotion partnerships)
- Affiliates (e.g., influencers, ambassadors, tipsters)
- In-app / in-game advertising (e.g., mobile games, gambling platforms)

Gambling content is a broader term which includes marketing created by and paid-for by gambling companies, but also other user-generated content (e.g., memes, viral videos, live streams) that normalises gambling and embeds it into culture.

There are many ways of categorising content, such as the format (e.g., audio, text-based, video, static), or whether it is organic (e.g., on gambling companies' own social media pages or websites) or paid-for (e.g., display adverts on websites). There is a temporal nature for some content (e.g., live streaming, time-bound Instagram stories) and the source of the message can vary (e.g., gambling company themselves or third party such as affiliate, influencer, partner). This produces a complex environment where marketing is difficult to identify from content, and misconduct can often stay under the radar.

2.4 Introduction to the wider marketing policy context in Great Britain

The Government White Paper 'High Stakes: Gambling Reform for the Digital Age,'³¹ published in April 2023, set out a raft of policy changes to reduce the impact of gambling harms in GB. GambleAware welcomed this substantial package of measures, including the introduction of the statutory levy, but stated that the lack of greater regulation on gambling advertising and marketing was a missed opportunity, particularly in regard to protecting children and young

³¹ High Stakes: Gambling Reform for the Digital Age

<https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age/high-stakes-gambling-reform-for-the-digital-age>

people.³²³³ This view has been shared by a range of stakeholders including parliamentarians³⁴, academics,³⁵ those with lived experience of gambling harms,³⁶ and the majority of the public.³⁷

2.5 Overview of the regulatory system for gambling marketing and content online

Research from Western Europe indicates that many countries are adopting stricter gambling marketing restrictions, which are increasingly viewed by policymakers and researchers as proportionate to protect children and vulnerable groups rather than radical interventions.³⁸ In contrast, GB remains an outlier, continuing to rely heavily on industry self-regulation and showing limited restrictions on online gambling marketing. This regulatory gap leaves CYP disproportionately exposed to gambling content compared with their peers in countries such as Belgium, where tighter rules have been introduced.

Research has shown that in many other Western European countries, gambling marketing regulations and bans are increasingly seen as proportionate rather than radical. GB lags behind other European countries in restricting online gambling marketing, and is an outlier that heavily relies on industry self-regulation.³⁹

Across Government there are multiple gambling reform initiatives to restrict online advertising. However, this has created a challenge: a patchwork structure with various authorities responsible for regulation, and an over reliance on self-regulation. Without a clear line of accountability and regulatory oversight there will continue to be a disjointed approach and enforcement will continue to be time consuming and difficult.⁴⁰

The various bodies responsible for monitoring and regulating online gambling marketing and content⁴¹ are:

- **Government Departments:**

³² GambleAware response to the Gambling White Paper

<https://www.gambleaware.org/what-we-do/news/news-articles/gambleaware-response-to-the-gambling-white-paper/>

³³ Gambling marketing in Great Britain: What needs to change and why?

<https://www.gambleaware.org/our-research/publication-library/publication-library/gambling-marketing-in-great-britain-what-needs-to-change-and-why/>

³⁴ MPs call for cut to football gambling adverts to shield children from exposure <https://committees.parliament.uk/committee/378/culture-media-and-sport/committee/news/199092/mps-call-for-cut-to-football-gambling-adverts-to-shield-children-from-exposure/>

³⁵ 'No evidence of harm' implies no evidence of safety: Framing the lack of causal evidence in gambling advertising research <https://onlinelibrary.wiley.com/doi/10.1111/add.16369>

³⁶ The views and evidence of people with lived experience of gambling harms: A response to the DCMS Gambling Act Review

<https://gamfam.org.uk/wp-content/uploads/2021/05/WeAreTheEvidenceToo-FINAL-0002.pdf>

³⁷ Ipsos research explores barriers to opening up about experiencing problems with gambling

<https://www.ipsos.com/en-uk/ipsos-research-explores-barriers-opening-about-experiencing-problems-gambling>

³⁸ Drivers of Gambling Marketing Restrictions – An International Comparison

<https://www.gambleaware.org/our-research/publication-library/articles/drivers-of-gambling-marketing-restrictions-an-international-comparison/>

³⁹ Drivers of Gambling Marketing Restrictions – An International Comparison

<https://www.gambleaware.org/our-research/publication-library/articles/drivers-of-gambling-marketing-restrictions-an-international-comparison/>

⁴⁰ Mapping online advertising issues, and industry and regulatory initiatives <https://plumconsulting.co.uk/mapping-online-advertising-issues-and-industry-and-regulatory-initiatives/>

⁴¹ For a useful overview on how gambling advertising is jointly regulated by government, arm's length bodies and a self-regulatory system in GB, please refer to the *Gambling advertising: how is it regulated?* report, produced by the House of Commons Library <https://researchbriefings.files.parliament.uk/documents/CBP-7428/CBP-7428.pdf>

- The Department for Culture, Media and Sport (DCMS) leads on gambling policy, and sponsors and sets the regulatory remit and priorities for the Gambling Commission, the gambling regulator.⁴² Alongside the Department of Health and Social Care (DHSC), DCMS is currently implementing restrictions on online advertising in other areas of health (e.g., products high in fat, salt or sugar).⁴³ The Department also oversees the Online Advertising Programme,⁴⁴ which aims to build a fit-for-purpose, agile regulatory framework, that protects internet users from bad actors. There is a particular focus on protecting under-18s from online advertising fraud, illegal content and illegal adverts.
- DHSC has had a minimal role in gambling policy to date, but will commission “prevention” activities funded through a new levy on gambling.⁴⁵ The department has stated that its approach to prevention is “through the levy and not through regulation,” suggesting they will continue to have a minimal impact on policy.⁴⁶
- The Department for Science, Technology and Innovation (DSIT) has also had a minimal role, but will sit on the incoming Gambling Levy Board.⁴⁷ DSIT oversees the Online Safety Act (OSA)⁴⁸ which seeks to implement a new risk-based regulatory framework. This places the onus on online service providers to assess the potential risk of illegal harm to users and decide what safety measures to implement. Platforms are required to prevent children from accessing harmful and age-inappropriate content and provide parents and children with clear and accessible ways to report problems online when they arise through Ofcom.^{ibid}
- **Statutory regulators:**
 - The Gambling Commission licence and regulate those providing gambling services in Great Britain.⁴⁹ In extreme circumstances, this regulator can revoke a licence for misconduct related to online advertising⁵⁰. In response to the 2023 gambling White Paper “*High stakes: gambling reform for the digital age*”⁵¹ the Gambling Commission recently implemented new rules for operators (e.g., requiring opt-in to direct marketing),⁵² working with the Advertising Standards

⁴² Gambling Commission Framework Document <https://www.gov.uk/government/publications/gambling-commission-framework-document/gambling-commission-framework-document>

⁴³ Introducing further advertising restrictions on TV and online for products high in fat, salt or sugar: government response to consultation on secondary legislation <https://www.gov.uk/government/consultations/introducing-further-advertising-restrictions-on-tv-and-online-for-products-high-in-fat-salt-or-sugar-secondary-legislation/outcome/introducing-further-advertising-restrictions-on-tv-and-online-for-products-high-in-fat-salt-or-sugar-government-response-to-consultation-on-secondary>

⁴⁴ Government response to Online Advertising Programme consultation <https://www.gov.uk/government/consultations/online-advertising-programme-consultation/outcome/government-response-to-online-advertising-programme-consultation#chap3>

⁴⁵ Statutory gambling levy: update on prevention <https://questions-statements.parliament.uk/written-statements/detail/2025-02-12/hcws444#>

⁴⁶ Gambling-related harms: MPs call on Government to act <https://committees.parliament.uk/committee/81/health-and-social-care-committee/news/206727/gambling-related-harms-mps-call-on-government-to-act/>

⁴⁷ Government response to the consultation on the structure, distribution and governance of the statutory levy on gambling operators <https://www.gov.uk/government/consultations/consultation-on-the-statutory-levy-on-gambling-operators/outcome/government-response-to-the-consultation-on-the-structure-distribution-and-governance-of-the-statutory-levy-on-gambling-operators#part-3-the-governance-of-the-levy>

⁴⁸ Online Safety Act: explainer <https://www.gov.uk/government/publications/online-safety-act-explainer/online-safety-act-explainer>

⁴⁹ We regulate most types of gambling in Great Britain, including The National Lottery in the UK. <https://www.gamblingcommission.gov.uk/about-us/what-we-do>

⁵⁰ Everton sponsor leaves UK after porn ad probe <https://www.bbc.co.uk/news/articles/cg5y9ggqgqdo>

⁵¹ High stakes: gambling reform for the digital age <https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age>

⁵² Summer 2023 consultation – Proposed changes to LCCP and RTS: Consultation Response <https://www.gamblingcommission.gov.uk/consultation-response/summer-2023-consultation-proposed-changes-to-lccp-and-rts-consultation/summary-of-responses-and-our-position-improving-customer-choice-on-direct>

Authority (ASA) to tackle content marketing, which does not directly advertise a product or service,⁵³ and will be reviewing incentives (e.g., free bets, bonuses) to ensure that they are constructed and targeted in a socially responsible way.⁵⁴

- The Office of Communications (Ofcom) is the UK's statutory regulator for broadcasting and telecoms, responsible for enforcing advertising standards and protecting children from harmful content online. The ASA monitors and enforces advertising codes on a daily basis, with Ofcom acting as the statutory backstop where stronger enforcement is needed.⁵⁵ Under the OSA, Ofcom also oversees online services, ensuring platforms meet safety duties, particularly to protect children from harmful and age-inappropriate content.⁵⁶
- The Information Commissioner's Office (ICO) has previously conducted investigations into the usage of AdTech,⁵⁷ specifically to ensure that personal data is used responsibly in online advertising. Their new strategy aims to enhance transparency and user control over online tracking, with a particular focus on online advertising.⁵⁸

- **Self-regulatory mechanisms**

- The Advertising Standards Authority (ASA)⁵⁹ is the self-regulatory organisation of the advertising industry. It is independent of the government and the advertising industry and enforces the Committee of Advertising Practice (CAP) code.⁶⁰ The ASA have proactive monitoring alongside individuals being able to submit complaints.⁶¹ It has also been working with the Gambling Commission to tackle content marketing that may inappropriately appeal to children,⁶² has conducted research to help interpret what might be appealing to CYP,⁶³ and has recently closed a loophole to enforce rules on businesses based outside of the UK.⁶⁴ ASA's regulation of online advertising is limited and does not cover engagement-driven content distribution and algorithmic targeting.⁶⁵

⁵³ High stakes: gambling reform for the digital age

<https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age/high-stakes-gambling-reform-for-the-digital-age>

⁵⁴ Summer 2023 consultation – Proposed changes to LCCP and RTS: Consultation Response

<https://www.gamblingcommission.gov.uk/print/summer-2023-consultation-proposed-changes-to-lccp-and-rtts-consultation>

⁵⁵ Renewing the advertising co-regulatory arrangements <https://www.ofcom.org.uk/tv-radio-and-on-demand/advertising/consultation-renewing-the-co-regulatory-arrangements-for-broadcast-on-demand-and-video-sharing-platform-advertising>

⁵⁶ Online safety <https://www.ofcom.org.uk/online-safety>

⁵⁷ Our work on adtech <https://ico.org.uk/about-the-ico/what-we-do/our-work-on-adtech/>

⁵⁸ Taking control: our online tracking strategy <https://ico.org.uk/about-the-ico/our-information/our-strategies-and-plans/online-tracking-strategy/>

⁵⁹ Of particular relevance is the role of the Advertising Standards Association (ASA) which is the main regulatory oversight. The ASA enforces the Committee of Advertising (CAP) code to non-broadcast adverts, sales promotions, and direct marketing communications. The codes aim to ensure that "marketing communications for gambling must be socially responsible, with particular regard to the need to protect children, young persons and other vulnerable persons from being harmed or exploited."

⁶⁰ 16 Gambling https://www.asa.org.uk/type/non_broadcast/code_section/16.html

⁶¹ How we regulate online ads <https://www.asa.org.uk/news/how-we-regulate-online-ads.html>

⁶² High stakes: gambling reform for the digital age

<https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age/high-stakes-gambling-reform-for-the-digital-age>

⁶³ Research on the 'strong appeal' of personalities in advertising to young people

<https://www.asa.org.uk/resource/research-on-the-strong-appeal-of-personalities-in-advertising-to-young-people.html>

⁶⁴ Regulatory statement on extending the scope of the CAP Code

<https://www.asa.org.uk/resource/regulatory-statement-on-extending-the-scope-of-the-cap-code.html>

⁶⁵ Briefing Paper for UK Parliamentary Select Committee Inquiry: The Hidden Forces and Harms of the Digital Advertising Ecosystem

<https://committees.parliament.uk/writtenevidence/139719/html/>

- The Incorporated Society of British Advertisers (ISBA) have produced an influencer code of conduct⁶⁶ to encourage better standards in influencer advertising. This includes considerations for age-restricted products.
- The Industry Code for Socially Responsible Advertising⁶⁷ is produced by the Industry Group for Responsible Gambling (IGRG) and facilitated by the Betting Gaming Council (BGC). It sets minimum standards (e.g., requiring social media posts to include 18+ symbols alongside signposting to GambleAware). The BGC also produced a sports-specific framework to “set new standards on safer gambling sponsorship.”⁶⁸

⁶⁶ ISBA & IMTB Influencer Marketing Code of Conduct - Version 4 <https://www.isba.org.uk/knowledge/isba-imtb-influencer-marketing-code-conduct-version-4>

⁶⁷ Industry Group for Responsible Gambling <https://bettingandgamingcouncil.com/members/igrig>

⁶⁸ BGC welcome sports bodies' landmark new sponsorship codes of conduct <https://bettingandgamingcouncil.com/news/bgc-welcome-sports-bodies>

3. The impact of, and issues with, gambling marketing and content online

3.1. The negative impact is greater among communities most at-risk

Research has shown evidence of a ‘dose–response’ effect; whereby greater advertising exposure increases participation which leads to a greater risk of harm.⁶⁹ Negative impacts are more likely among CYP and those already experiencing gambling harms^{ibid}.

3.1.1 Impact on children and young people

Despite not wanting to, CYP are regularly exposed to online gambling marketing

Half of children aged 3–12 use at least one social media app or website despite the minimum age requirement of 13^{ibid}, and 94% of 16–17-year-olds have their own social media profile^{ibid}. With one in three of all internet users under the age of 18,⁷⁰ most online marketing and content inherently skews towards younger individuals.

There is a high level of exposure to gambling, an age-restricted activity, among children online. Over three in five 11–17-year-olds have seen or heard gambling advertising via online platforms (e.g., social media, streaming platforms) (62%), with almost half of this group seeing gambling advertising on social media weekly (46%).⁷¹

Exposure is amplified by platform design (e.g., algorithmic recommendation systems) and marketing practices (e.g., targeted advertising, influencer content, embedded promotion), which can all deliver gambling content directly to CYP, often without active searching or consent. These mechanisms make it difficult for children to avoid gambling-related messages, even if they are not intentionally engaging with gambling content.

Children report feeling “saturated” by the amount of gambling content online,⁷² with many feeling they don’t have control over the amount of gambling content they see, and want to see less.⁷³ Children want the government to take more action, with around four in five agreeing

⁶⁹ What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature <https://www.sciencedirect.com/science/article/pii/S0033350622003420>

⁷⁰ Know your rights online <https://www.digital-futures-for-children.net/for-children/know-your-rights-online#:~:text=It%20is%20estimated%20that%201,important%20to%20know%20your%20rights.>

⁷¹ Young People and Gambling 2024: Official statistics <https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-2024-official-statistics/vpg-2024-recall-of-gambling-adverts-and-promotion-recall-of-gambling>

⁷² Qualitative Research on the Lived Experience and Views of Gambling among Children and Young People <https://www.gambleaware.org/our-research/publication-library/articles/qualitative-research-on-the-lived-experience-and-views-of-gambling-among-children-and-young-people/>

⁷³ Young people and gambling-related influencer content: Understanding exposure to and impact of gambling-related influencer content on young people and identifying potential strategies for change <https://www.gambleaware.org/our-research/publication-library/articles/young-people-and-gambling-related-influencer-content-understanding-exposure-to-and-impact-of-gambling-related-influencer-content-on-young-people-and-identifying-potential-strategies-for-change/>

that “nobody under the age of 18 should be exposed to content and advertising about gambling,” and that “there should be more rules around gambling content on social media.”⁷⁴

The way in which online gambling marketing normalises gambling as harmless, increases risk
Online marketing poses distinct issues among CYP due to the blurring of paid advertising with wider marketing content, such as content marketing⁷⁵ and influencer marketing.⁷⁶ This blending makes it difficult for children to recognise what is advertising and what is independent content. This normalises gambling, presenting it as harmless or risk-free⁷⁷ and rarely includes visible risk warnings or transparent disclosures.⁷⁸ This is particularly concerning for children, who are likely to have higher levels of risk-taking, novelty seeking, and impulsivity due to their neurodevelopmental status⁷⁹. Some have suggested that gambling advertising is inherently misleading due to this⁸⁰ and often exaggerates the chances of winning.⁸¹

The perception of gambling as “harmless fun” encourages children to participate

As a result, CYP are disproportionately at risk of developing misconceptions about gambling, normalising the activity at an early age, and being drawn toward gambling products before they are legally permitted to participate. One study found that almost one in five 11–15-year-old children who reported gambling had engaged in the National Lottery and 8% had visited betting shops.⁸² Among children who gamble, the most common reasons are because it is fun (80%), to try to win money (34%), or for the chance to win something (37%). This demonstrates that the marketing of gambling filters down to motivations and behaviour among CYP. For children exposed to gambling at an early age, it can feel like an ordinary, and often cherished, part of their childhoods, and so – once old enough – they start gambling as soon as they can.⁸³

Content creators, often trusted by young audiences, are ‘teaching’ young people gambling behaviours in spaces that are not monitored by parental or trusted adult supervision.⁸⁴ As the brain is still developing until the age of around 25, CYP experience more intense urges but lack

⁷⁴ The Appeal of Celebrity Ambassadors to Children & Young People Aged 11-17. <https://www.gambleaware.org/our-research/publication-library/articles/sherbert-research-the-appeal-of-celebrity-ambassadors-to-children-young-people-aged-11-17/>

⁷⁵ Clearly (not) identifiable – The recognisability of gambling content marketing <https://journals.sagepub.com/doi/10.1177/14707853241292953>

⁷⁶ Influencer-Driven Gambling Content and Its Impact on Children and Young People: A Scoping Study

<https://link.springer.com/article/10.1007/s40429-025-00616-z>

⁷⁷ New Developments in Gambling Marketing: the Rise of Social Media Ads and Its Effect on Youth

<https://link.springer.com/article/10.1007/s40429-022-00457-0>

⁷⁸ Young people and gambling-related influencer content: Understanding exposure to and impact of gambling-related influencer content on young people and identifying potential strategies for change. <https://www.gambleaware.org/our-research/publication-library/articles/young-people-and-gambling-related-influencer-content-understanding-exposure-to-and-impact-of-gambling-related-influencer-content-on-young-people-and-identifying-potential-strategies-for-change/>

⁷⁹ Adolescent Gambling: Research and Clinical Implications <https://pmc.ncbi.nlm.nih.gov/articles/PMC2945873/#B29>

⁸⁰ Gambling advertising is inherently misleading <https://www.tandfonline.com/doi/full/10.1080/16066359.2025.2555471#d1e164>

⁸¹ Young people's gambling-related experience during major sports events: A Euro 2024 diary study

<https://www.bi.team/publications/young-peoples-gambling-related-experience-during-major-sports-events-a-euro-2024-diary-study/>

⁸² The effect of marketing and advertising on children, young people and vulnerable people: Quantitative Research Report <https://www.gambleaware.org/our-research/publication-library/articles/the-effect-of-marketing-and-advertising-on-children-young-people-and-vulnerable-people-quantitative-research-report/>

⁸³ Annual GB Treatment and Support Survey 2022

<https://www.gambleaware.org/our-research/publication-library/articles/annual-gb-treatment-and-support-survey-2022/>

⁸⁴ Young people and gambling: Qualitative research

<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/young-people-and-gambling-qualitative-research>

the prefrontal functioning to inhibit those urges, resulting in impulsive behaviours.⁸⁵ CYP who follow gambling influencers are more likely to engage in high-risk behaviours such as using promo codes, experimenting with crypto casinos, and gambling online.⁸⁶

Children are subsequently at-risk of harm in adulthood

The liberalisation of gambling in the UK through the 2005 Gambling Act significantly increased the visibility and availability of gambling products. Young people aged 18-24, the gambling generation, which has grown up alongside the liberalisation of gambling, are over three times more likely to experience 'problem gambling' (PGSI 8+) when gambling compared to average (19% vs 6%).⁸⁷ There are also approximately 85,000 11–17-year-olds in Great Britain experiencing problems with gambling - a significant increase on the year before.⁸⁸

The mental health burden among young people is extensive, with young people aged 18-24 experiencing 'problem gambling' (PGSI 8+) around 50% more likely than average to be experiencing high psychological distress and low mental health wellbeing, and are over five times more likely to be at high risk of suicidal ideation.⁸⁹ Young adults are also much more susceptible to advertising, being more likely to click on gambling-related adverts⁹⁰ and more likely to report spending more money/time gambling due to advertising.⁹¹ Therefore, exposure to gambling advertising, that exacerbates the risk of gambling harms, is contributing to the wider mental health challenges among young people.

3.1.2 Impact on those already experiencing harms

Online marketing exacerbates harm among those already experiencing gambling harm

Those experiencing gambling harm are more likely to be influenced by gambling advertising, and experience more harms as a result.⁹² For example, those experiencing 'problem gambling' (PGSI 8+) are 40 times more likely than those without any recorded problems from gambling (PGSI 0) to have spent more money or time on gambling as a result of gambling adverts.⁹³ They

⁸⁵ Impulsive and Self-Conscious: Adolescents' Vulnerability to Advertising and Promotion
<https://journals.sagepub.com/doi/10.1509/jppm.2005.24.2.202>

⁸⁶ Young people and gambling-related influencer content: Understanding exposure to and impact of gambling-related influencer content on young people and identifying potential strategies for change <https://www.gambleaware.org/our-research/publication-library/articles/young-people-and-gambling-related-influencer-content-understanding-exposure-to-and-impact-of-gambling-related-influencer-content-on-young-people-and-identifying-potential-strategies-for-change/>

⁸⁷ GambleAware Annual GB Treatment and Support Survey 2024. <https://www.gambleaware.org/our-research/publication-library/articles/annual-gb-treatment-and-support-survey-2024/>

⁸⁸ 2024 Young People and Gambling Report <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/young-people-and-gambling-2024-official-statistics>. 1.5% of young people scored 4 or more on the DSM-IV-MR-J representing a young person experiencing 'problems' with their gambling. This equates to approximately 85,000 11–17-year-olds in England, Scotland and Wales (to the nearest 5,000).

⁸⁹ Internal analysis of merged 2020/21/22/23/24 Treatment and Support Survey dataset. Data not available beyond report.

Psychological stress defined using K-10 (score of 20+) (92% 18-24 PGSI 8+ vs 60% for general population)

Mental wellbeing defined using WEBWMS (low) (57% 18-24 PGSI 8+ vs 40% for general population)

Suicidal ideation defined using SIDAS (score of 21-50) (44% 18-24 PGSI 8+ vs 8% for general population)

⁹⁰ Testing of Safer gambling Videos – A randomized Control Trial.

<https://www.gambleaware.org/our-research/publication-library/articles/testing-safer-gambling-video-advertising-a-randomised-controlled-trial/>

⁹¹ Ipsos research explores barriers to opening up about experiencing problems with gambling

<https://www.ipsos.com/en-uk/ipsos-research-explores-barriers-opening-about-experiencing-problems-gambling>

⁹² What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature

<https://www.sciencedirect.com/science/article/pii/S0033350622003420>

⁹³ Ipsos research explores barriers to opening up about experiencing problems with gambling

<https://www.ipsos.com/en-uk/ipsos-research-explores-barriers-opening-about-experiencing-problems-gambling>

are 2.5 times more likely to feel overwhelmed by the amount of adverts about gambling, and over seven times more likely to report that adverts about gambling make it hard for them to cut down⁹⁴. Gambling adverts have also been shown to prompt consumers to start or re-start gambling, or to increase their gambling stakes.⁹⁴

This drives inequalities by disproportionately impacting communities at higher risk

It is well evidenced that gambling harms skew towards marginalised groups across a range of characteristics⁹⁵ (e.g., ethnicity, religion, sexuality, gender identity, neurodivergence) and locations (e.g., those in the most deprived areas). There is also a link between gambling and various metrics for poverty and financial hardship (e.g., low income, housing instability, homelessness).⁹⁶ These already disadvantaged groups are further harmed by the effects of gambling advertising.

Gambling marketing online can make people feel like they are partaking in something ‘everyone is doing’, enhancing a sense of belonging among groups who otherwise face discrimination and social exclusion in society.⁹⁷ With gambling activities often marketed as “risk free”⁹⁸ and falsely showing individuals always winning,⁹⁹ the marketing of gambling as a quick and easy way to make money is harmful among these communities.¹⁰⁰

3.2 Eight unique challenges to regulating gambling marketing and content online

There are some specific challenges that gambling marketing and content online poses.¹⁰¹

1. **High volume of content:** The lower costs of online marketing compared to other channels (e.g., TV) leads to a higher volume of content. This allows operators to create a wider pool of messages and a higher number of impressions per message. This makes it ‘challenging and resources intensive’ to monitor compliance,¹⁰² especially for content that only appears for a short time, such as Facebook or Instagram stories. Artificial intelligence (AI) will likely exacerbate this, by short-cutting the process of creating/posting content and increasing personalisation.¹⁰³

⁹⁴ Understanding how consumers engaged with gambling advertising in 2020

<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/understanding-how-consumers-engaged-with-gambling-advertising-in-2020>

⁹⁵ Internal analysis of merged 2020/21/22/23/24 Treatment and Support Survey dataset. Data not available beyond report.

⁹⁶ There is a link between gambling and a myriad of poverty measures (low income, housing instability, homelessness and neighbourhood disadvantage).

<https://www.tandfonline.com/doi/abs/10.1080/14459795.2020.1819365>

⁹⁷ People with intellectual disability and their lived experiences of gambling

<https://responsiblegambling.vic.gov.au/resources/publications/people-with-intellectual-disability-and-their-lived-experiences-of-gambling-995/>

⁹⁸ Minority Communities & Gambling Harms: Qualitative and Synthesis Report

<https://www.gambleaware.org/our-research/publication-library/articles/minority-communities-gambling-harms-qualitative-and-synthesis-report/>

⁹⁹ Emergent gambling advertising: a rapid review of marketing content, delivery and structural features

<https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-021-10805-w>

¹⁰⁰ Minority Communities & Gambling Harms: Qualitative and Synthesis Report

<https://www.gambleaware.org/our-research/publication-library/articles/minority-communities-gambling-harms-qualitative-and-synthesis-report/>

¹⁰¹ Navigating the digital age: The need for online-specific gambling marketing regulations <https://onlinelibrary.wiley.com/doi/10.1111/add.16578>

¹⁰² Our Active Ad Monitoring system <https://www.asa.org.uk/news/our-active-ad-monitoring-system.html>

¹⁰³ The personalization-privacy paradox: implications for new media <https://www.emerald.com/insight/content/doi/10.1108/icm-06-2015-1458/full/html>

2. **Enhanced data targeting and tracking capabilities:** The gambling industry employs highly sophisticated digital methods to target individuals with online marketing.¹⁰⁴ Previous legal cases have shown extensive digital profiling by the gambling industry¹⁰⁵, alongside covert tracking and data sharing.¹⁰⁶ This can lead to an increased risk of harm,¹⁰⁷ with the ICO acknowledging that gambling operators could drive harm by targeting individuals through their browsing record (e.g., sexuality, beliefs, location).¹⁰⁸
3. **Quick and easy conversion:** Within a few clicks, an individual can go from scrolling on social media to downloading an app, depositing money, and gambling.¹⁰⁹ The shift towards gambling online has made it highly accessible compared to other regulated products such as alcohol, which usually requires travel to access and involves constraints on the time of day it can be purchased.^{110,111} Nine in ten report that it is easy to open a new gambling account,¹¹² this quick conversion keeps individuals in a “hot state” rather than being able to pause and move into a more considered “cold state.”¹¹³ It is much harder for individuals to set appropriate limits and keep track of gambling when in this “hot state” of high arousal.¹¹⁴
4. **Increased shareability and content echo chambers:** Although gambling marketing is supposed to be “targeted away from children” it can easily find its way into young people’s online environments. The shareability of online content through interactions (e.g., likes, shares, comments)¹¹⁵ means family or friends may inadvertently share gambling content onto the feeds of CYP or those experiencing harms. Similarly, algorithms on social media platforms do not have the same age-restrictions in place compared to traditional media targeting. Platforms amplify content that users tend to engage with,¹¹⁶ creating an echo chamber when young people do engage with gambling content. Three in five (59%) children feel they have little to no control over their exposure to gambling content.¹¹⁷

¹⁰⁴ Emergent gambling advertising: a rapid review of marketing content, delivery and structural features

<https://link.springer.com/article/10.1186/s12889-021-10805-w>

¹⁰⁵ Digital profiling in the online gambling industry <https://cdn.sanity.io/files/btrscfl0/production/e23ea75fe93f775d9f9ed795427f4b5ed8d67016.pdf>

¹⁰⁶ Revealed: gambling firms secretly sharing users’ data with Facebook without permission

<https://www.theguardian.com/society/2025/feb/08/gambling-firms-secretly-shared-users-data-with-facebook-without-permission>

¹⁰⁷ High Court rules Sky Bet breached data laws to target problem gambler

<https://igamingbusiness.com/legal-compliance/legal/high-court-sbg-breached-data-laws/>

¹⁰⁸ Taking control: our online tracking strategy <https://ico.org.uk/about-the-ico/our-information/our-strategies-and-plans/online-tracking-strategy/>

¹⁰⁹ Making gambling safer: improving the uptake and design of tools to help people control their gambling

<https://www.bi.team/blogs/making-gambling-safer-improving-the-uptake-and-design-of-tools-to-help-people-control-their-gambling/>

¹¹⁰ Online Gambling: A Systematic Review of Risk and Protective Factors in the Adult Population <https://pmc.ncbi.nlm.nih.gov/articles/PMC11272810/>

¹¹¹ Online Gambling in Youth https://link.springer.com/chapter/10.1007/978-3-031-69362-5_81

¹¹² Evening the Odds <https://www.citizensadvice.org.uk/wales/policy/publications/evening-the-odds/>

¹¹³ Using a Behavioural Risk Audit to identify harmful design features on gambling websites

<https://www.bi.team/publications/using-a-behavioural-risk-audit-to-identify-harmful-design-features-on-gambling-websites/>

¹¹⁴ Can behavioural insights be used to reduce risky play in online environments?

<https://www.gambleaware.org/our-research/publication-library/articles/can-behavioural-insights-be-used-to-reduce-risky-play-in-online-environments/>

¹¹⁵ ADVERTISING ON EARNED MEDIA IN SOCIAL MEDIA: SYSTEMATIC LITERATURE REVIEW <https://transpublika.co.id/ojs/index.php/JEKOMBITAL/article/view/616>

¹¹⁶ An End to Junk Food Marketing Online: Policy Position

<https://obesityhealthalliance.org.uk/wp-content/uploads/2020/11/Ending-junk-food-marketing-online-position-paper.pdf>

¹¹⁷ Young people and gambling-related influencer content: Understanding exposure to and impact of gambling-related influencer content on young people and identifying potential strategies for change <https://www.gambleaware.org/our-research/publication-library/articles/young-people-and-gambling-related-influencer-content-understanding-exposure-to-and-impact-of-gambling-related-influencer-content-on-young-people-and-identifying-potential-strategies-for-change/>

5. **Increased anonymity:** The online environment offers more anonymity and privacy for individuals compared to land-based premises.¹¹⁸ This enables individuals to keep their gambling “hidden”, making it harder for friends and family members to intervene before harms escalate.¹¹⁹ With some children’s online activity unsupervised by parents, adults are less able to identify advertising and educate them about the potential risks.¹²⁰
6. **Blurring of paid-for, editorial, and user-generated content:** Some forms of marketing are more explicit, whilst other types (e.g., content marketing,¹²¹ ads on search engines)¹²² are more difficult to identify as advertising.¹²³ Certain tactics build parasocial relationships (i.e., one-way relationships with influencers) which can build trust¹²⁴ and increase the likelihood of individuals engaging in promoted behaviours such as gambling.¹²⁵ Some marketing techniques can drive individuals to gamble¹²⁶ through building a sense of community (e.g., tipster groups, reddit forums, discord groups).
7. **Lack of effective age verification methods:** Many platforms do not verify an individual’s age before allowing them to view content. Those that do, often ask for no proof of age, allowing those under 18 to lie to access age-restricted content. A third of those aged 8-17 have set the age on their social media accounts to 18+.¹²⁷
8. **Inconsistent regulations worldwide:** Online content often crosses national borders, meaning material created or hosted in other countries can easily be accessed by users in GB.¹²⁸ This makes it difficult for regulators to enforce domestic rules consistently and creates gaps in protection for children. This means that online regulation is only as strong as its weakest market, with unethical practices impacting those in the UK (e.g., targeting those who have self-excluded from GamStop,¹²⁹ encouraging children to gamble on crypto-casinos,¹³⁰ and targeting users through pornography platforms).¹³¹ Local regulations can also be circumvented by proxy servers, a virtual private network (VPN), or similar services that mask or mislead a user’s geolocation.¹³² VPNs are no

¹¹⁸ Building Knowledge of Women’s Lived Experience of Gambling and Gambling Harms Across Great Britain Final Report

<https://www.gambleaware.org/media/bvunkhiw/building-knowledge-of-women-s-lived-experience-of-gambling-and-gambling-harms-across-great-britain.pdf>

¹¹⁹ Annual GB Treatment and Support Survey 2023

<https://www.gambleaware.org/our-research/publication-library/articles/annual-gb-treatment-and-support-survey-2023/>

¹²⁰ Young people and gambling: Qualitative research <https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-qualitative-research/how-the-changing-spaces-of-gambling-reduces-supervision-young-people>

¹²¹ Clearly (not) identifiable – The recognisability of gambling content marketing

<https://journals.sagepub.com/doi/10.1177/14707853241292953?icid=int.sj-abstract.citing-articles.5>

¹²² Children and parents: media use and attitudes report 2025

<https://www.ofcom.org.uk/media-use-and-attitudes/media-habits-children/children-and-parents-media-use-and-attitudes-report-2025>

¹²³ Priming Young Minds: The Appeal of Gambling Advertising to Children and Young People <https://www.journals.uchicago.edu/doi/10.1086/729290>

¹²⁴ Influencer Marketing: How Message Value and Credibility Affect Consumer Trust of Branded Content on Social Media. Accessible [here](#).

¹²⁵ Young people’s views about the use of celebrities and social media influencers in gambling marketing

<https://academic.oup.com/heapro/article/39/1/daae012/7604737?login=false>

¹²⁶ Gambling Harms and Coping with Marginalisation and Inequality: Marginalisation, Isolation and Criminalisation in Great Britain

<https://www.gambleaware.org/our-research/publication-library/articles/gambling-harms-and-coping-with-marginalisation-and-inequality/>

¹²⁷ Children’s Online User Ages Quantitative Research Study <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/keeping-children-safe-online/childrens-online-user-ages/children-user-ages-chart-pack.pdf?v=328540>

¹²⁸ What’s next for WHO’s global strategy to reduce the harmful use of alcohol? <https://pmc.ncbi.nlm.nih.gov/articles/PMC7047030/>

¹²⁹ Crypto Casinos Exploiting The UK’s Gambling Self-Exclusion Loopholes <https://www.forbes.com/sites/boazsabrado/2025/09/03/crypto-casinos-exploiting-the-uks-gambling-self-exclusion-loopholes/>

¹³⁰ Access to illegal crypto casino sites for sale on Facebook and Discord for as little as £8

<https://news.sky.com/story/access-to-illegal-crypto-casino-sites-for-sale-on-facebook-and-discord-for-as-little-as-8-13056186>

¹³¹ Banned operators, business as usual <https://iosimarfootball.com/2025/07/07/banned-operators-business-as-usual/>

¹³² Examining the Use of Offshore Online Gambling Sites in the United States via Routine Activities Theory: A SEM Analysis <https://link.springer.com/article/10.1007/s10899-023-10212-3>

longer niche, with around a quarter of the UK public having used one¹³³ and some browsers offering a free and integrated VPN.¹³⁴ VPN usage has also surged due to the recent age verification requirements to access adult content.¹³⁵

3.3 The need to prioritise government action over self-regulation

The regulatory structures in the UK were designed in the broadcast era of marketing and are inadequate to deal with the digital age. The current regulatory system for online marketing in the UK, unlike many other EU countries, is one primarily of self-regulation.¹³⁶ There are long-established concerns that self-regulation creates a conflict of commercial interest, and does not create suitable monitoring and enforcement.¹³⁷

To support the move away from self-regulation, there needs to be a stronger coordination across relevant workstreams and authorities with a clear line of accountability.¹³⁸ This needs to include self-regulatory efforts (e.g., industry-led Code for Socially Responsible Advertising,¹³⁹ CAP code enforced by the ASA)¹⁴⁰ but also across government departments with DCMS and DSIT responsible for different areas of the online environment.

The government should take learnings from another public health issue, unhealthy foods, where there was recently a shift to focus on legislation rather than self-regulation for restrictions in advertising of foods high in fat, salt and sugar (HFSS).¹⁴¹ The following reasons were identified for this, each of which could easily be applied to gambling given the high level of exposure to gambling in children's online environments:¹⁴²

- Future-proofing the policy against changes in children's media habits which are shifting online.
- Accounting for a lack of transparency and independent data for adverts served online.
- Addressing concerns with the efficacy of online controls which seek to target HFSS adverts away from children.

Further regulatory action on marketing is supported by a range of stakeholders including:

¹³³ Usage of virtual private networks (VPN) worldwide as of 2nd quarter 2024, by country. Accessible [here](#).

¹³⁴ Get to know Opera's features <https://www.opera.com/features>

¹³⁵ VPNs top download charts as age verification law kicks in <https://www.bbc.co.uk/news/articles/cn72yvj70g5o>

¹³⁶ Drivers of Gambling Marketing Restrictions – An International Comparison

<https://www.gambleaware.org/our-research/publication-library/articles/drivers-of-gambling-marketing-restrictions-an-international-comparison/>

¹³⁷ Industry influence on public health policy formulation in the UK: a complex systems approach

<https://academic.oup.com/heapro/article/39/6/daae139/7906031?login=false>

¹³⁸ Drivers of Gambling Marketing Restrictions – An International Comparison

<https://www.gambleaware.org/our-research/publication-library/articles/drivers-of-gambling-marketing-restrictions-an-international-comparison/>

¹³⁹ Gambling Industry Code for Socially Responsible Advertising https://bettingandgamingcouncil.com/uploads/22703-BGC-IGRG-Code-7th-Edition_100124.pdf

¹⁴⁰ Gambling advertising: how is it regulated? <https://researchbriefings.files.parliament.uk/documents/CBP-7428/CBP-7428.pdf>

¹⁴¹ Introducing further advertising restrictions on TV and online for products high in fat, salt or sugar: consultation on secondary legislation <https://www.gov.uk/government/consultations/introducing-further-advertising-restrictions-on-tv-and-online-for-products-high-in-fat-salt-or-sugar-secondary-legislation/introducing-further-advertising-restrictions-on-tv-and-online-for-products-high-in-fat-salt-or-sugar-consultation-on-secondary-legislation>

¹⁴² Introducing further advertising restrictions on TV and online for products high in fat, salt and sugar: government response. Accessible [here](#).

- Parliamentarians from the Culture, Media and Sport Committee,¹⁴³ The Health and Social Care Committee¹⁴⁴ and All Party Parliamentary Group for Gambling Reform¹⁴⁵
- Expert academics who work on gambling research,¹⁴⁶ health experts worldwide¹⁴⁷ and the World Health Organisation¹⁴⁸
- Charities in the third sector¹⁴⁹ and those with lived experience of gambling harms¹⁵⁰
- Public health bodies such as the Faculty of Public Health, the Royal Society for Public Health, the Association of Directors of Public Health ¹⁵¹
- Local government representatives such as the Local Government Association¹⁵² and individual local authorities¹⁵³
- The general public, with over seven in ten adults in GB agreeing that there should be more regulation around gambling advertising on social media (74%) and gambling related content on social media (70%).¹⁵⁴ 9 in 10 would support a ban on gambling advertising on social media sites popular with children¹⁵⁵
- Children, with around four in five aged 11-17 agreeing that there should be more rules around gambling content/advertising on social media (79%)¹⁵⁶

¹⁴³ MPs call for cut to football gambling adverts to shield children from exposure <https://committees.parliament.uk/committee/378/culture-media-and-sport-committee/news/199092/mps-call-for-cut-to-football-gambling-adverts-to-shield-children-from-exposure/>

¹⁴⁴ Gambling-related harms: MPs call on Government to act <https://committees.parliament.uk/committee/81/health-and-social-care-committee/news/206727/gambling-related-harms-mps-call-on-government-to-act/>

¹⁴⁵ Gambling reform APPG <https://gamblingreformappg.org/>

¹⁴⁶ 'No evidence of harm' implies no evidence of safety: Framing the lack of causal evidence in gambling advertising research <https://onlinelibrary.wiley.com/doi/10.1111/add.16369>

¹⁴⁷ Policies and interventions to reduce harmful gambling: an international Delphi consensus and implementation rating study [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(22\)00137-2/fulltext](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(22)00137-2/fulltext)

¹⁴⁸ Gambling <https://www.who.int/news-room/fact-sheets/detail/gambling>

¹⁴⁹ Campaigning <https://www.gamblingwithlives.org/campaigning/>

¹⁵⁰ The views and evidence of people with lived experience of gambling harms: A response to the DCMS Gambling Act Review <https://gamfam.org.uk/wp-content/uploads/2021/05/WeAreTheEvidenceToo-FINAL-0002.pdf>

¹⁵¹ Ending gambling adverts could prevent harm to millions of adults and children in the UK <https://www.bmi.com/content/388/bmi.r158>

¹⁵² Review of the Gambling Act 2005 Terms of Reference and Call for Evidence - LGA response <https://www.local.gov.uk/parliament/briefings-and-responses/review-gambling-act-2005-terms-reference-and-call-evidence-lga>

¹⁵³ Advertising gambling is harmful. Help us to end it. <https://cega.org.uk/home-2/>

¹⁵⁴ Ipsos research explores barriers to opening up about experiencing problems with gambling <https://www.ipsos.com/en-uk/ipsos-research-explores-barriers-opening-up-about-experiencing-problems-gambling>

¹⁵⁵ GambleAware Annual GB Treatment and Support Survey 2024. <https://www.gambleaware.org/our-research/publication-library/articles/annual-gb-treatment-and-support-survey-2024/>

¹⁵⁶ The Appeal of Celebrity Ambassadors to Children & Young People Aged 11-17. <https://www.gambleaware.org/our-research/publication-library/articles/sherbert-research-the-appeal-of-celebrity-ambassadors-to-children-young-people-aged-11-17/>

4. Moving towards a stronger regulatory system

4.1 GambleAware's policy asks

We are calling on the **Government to further restrict gambling marketing and content online**. In the short term whilst wider regulations are put in place, it is crucial **that both gambling marketing and content online are within scope of incoming recommendations arising from the cross-departmental Safer Gambling Messaging Group**.

Currently there lacks a single entity with oversight and accountability, including a lack of clarity over where departmental accountabilities sit for specific workstreams, given the shared responsibility between DCMS and DSIT across different areas of the online environment. This challenge is exacerbated by insufficient regulatory structures that rely too heavily on self-regulation and do not reflect the unique challenges presented by the digital age. GambleAware is recommending a multifaced approach to reduce harm through a stronger regulatory system, an overview of which can be found below.

It is inevitable that some gambling content, particularly from operators not licensed in GB or operating outside regulatory frameworks altogether, will find its way into the online environments of CYP. Alongside efforts to disrupt unregulated operators, regulatory approaches need to be combined with wider efforts to educate CYP on media literacy¹⁵⁷ within the national curriculum.¹⁵⁸ We also need to increase confidence among adults to have open conversations with CYP about these issues, without fear of judgement and consequences (e.g., banning devices), just 5% of teachers are very confident teaching this topic.¹⁵⁹

Below is a summary of the potential policies available, alongside which organisations could lead each workstream. It is worth noting that some of these may exceed current legal powers, requiring legislative changes by the government.

¹⁵⁷ What Parents and Teachers Need to Know about Media Literacy and Gambling, Gaming, and Digital Media Use https://morethanagame.nc.gov/wp-content/uploads/MediaLiteracy_Gambling_web.pdf

¹⁵⁸ Failure to prioritise media literacy in the UK presents a risk to social cohesion and democracy <https://committees.parliament.uk/work/9030/media-literacy/news/208665/failure-to-prioritise-media-literacy-in-the-uk-presents-a-risk-to-social-cohesion-and-democracy/>

¹⁵⁹ Why media literacy should be embedded in the national curriculum <https://www.tes.com/magazine/analysis/general/teaching-media-literacy-in-schools-spot-fake-news>

Theme	Sub-theme	Responsible	Example policy levers
Aligning and strengthening online safety powers and regulatory programmes	Ensure a single entity has oversight of online safety to increase accountability	DSIT / DCMS	- DSIT takes on sole government oversight role for online safety. - Clarification of the respective responsibilities of Ofcom, ASA and ICO.
	Increase government collaboration with the ASA to improve scope, monitoring and enforcement	DSIT / DCMS	- Give a government department sponsorship responsibilities of the ASA. - Increase collaboration between the ASA and Ofcom. - Widen Ofcom's scope under the Online Safety Act to include gambling content.
Increasing action from online platforms	Increase accountability on online platforms	DSIT	- Introduce a requirement for "safety by design" on all online platforms. - Introduce a standard of proof, similar to the financial services sector "Consumer Duty" to online platforms that host gambling marketing and content. - Increase algorithmic transparency and reporting.
	Increase age protections on online platforms	DSIT	- Implement robust age assurance to view all gambling content. - Implement opt-out defaults which are cross-platform. - Strengthen device-level age verification on internet-enabled devices.
Ensuring existing government programmes on online marketing and content work towards reducing gambling harms	The Online Advertising Programme	DCMS	- Age Assurance: Increased engagement with stakeholders within the gambling sector to reduce children's exposure to age-restricted products. - Gold Standard: Consider "not on GamStop" advertising that is driving individuals into the unregulated black market in scope. - Influencer marketing: Implement independent monitoring and evaluation of code to assess effectiveness. - Information sharing: If successful, expand to age restricted adverts rather than just scam adverts. - Intermediary and Platform Principles (IPP): Clarify the "next steps" in this programme. - Research: Clarify how the programme intends to restrict gambling marketing, after its own research showed a high level of gambling exposure among children.
	The Online Safety Act	DSIT / Ofcom	- Content within scope: Illegal content could include "not on GamStop" advertising that is driving individuals into the unregulated black market, whilst gambling, could be considered within scope of the "content that is harmful to children". - Wider mechanisms: Learnings could be applied to the gambling sector (e.g., increased enforcement powers, robust age verifications, consumer controls).
Tightening existing self-regulatory measures	Further restrictions on what content and tactics are "appealing" to children	ASA	Tighten the BCAP/CAP code on what "appeals" to children.
	Further restrictions on the targeting of gambling advertising	ASA	Tighten the current "25% rule" within the CAP code to ensure age-restricted products have minimal exposure to children.
	Ground guidance in the lived experience of children and those who have experienced gambling harms	ASA	- Set up a panel of children to judge whether advertising is appealing. - Set up a panel of those with lived experience of gambling harms to judge whether advertising is "socially responsible".
	Clarify definition of "vulnerability" to make it easier to identify malpractice	GC / ASA	Provide an updated definition of "vulnerable" to reflect a public health approach which recognises vulnerability is not static and applies to all of us.
Establishing a cross-government taskforce to explore targeted policies	Explore protective messages on gambling marketing and content	DCMS / GC	Make signposting and/or health warnings a mandatory requirement when the name or logo of a gambling company is spoken or shown within online content.
	Explore restrictions on inducement marketing	DCMS / GC	Ban the usage of inducement marketing where it includes wagering requirements.
	Explore restrictions on content marketing	DCMS / GC	Ban gambling operators using content marketing on their social media channels.
	Explore restrictions on who represents gambling companies	DCMS / GC	Ban individuals such as influencers, celebrities and tipsters from representing gambling companies.
	Explore restrictions on the marketing of specific gambling activities	DCMS / GC	Ban the marketing of products most commonly associated with harm (e.g., online casino games and slots).
	Explore restrictions on paid-for media targeting	DCMS / GC	Only allow age-based media targeting, with the age of 25 the lower limit.
	Explore restrictions on influential environments	DCMS / GC	A ban on gambling marketing at sports and esports events (inc. removal of sponsorship logos from sports clothing, merchandise, and wider stadium/arenas).
	Explore restrictions on social media platforms	DCMS / GC	Ban the marketing of gambling on online channels most popular with children.

4.2 Aligning and strengthening online safety powers and regulatory programmes

Current regulatory structures for online marketing and content often operate with fragmented oversight, limited enforcement powers, and inconsistent monitoring across platforms. This fragmentation makes it difficult to respond effectively to the scale, speed, and complexity of online gambling marketing, particularly when content is highly personalised, short-lived (e.g., social media “stories”), or originates from operators outside UK regulatory frameworks. While these challenges are particularly acute for gambling, some of the mechanisms we recommend (e.g., enhanced platform accountability, improved age assurance, and “safety by design”) could also strengthen wider online safety protections beyond gambling.

4.2.1 Ensure a single entity has oversight of online safety to increase accountability

Policy lever(s):

- DSIT takes on sole government oversight role for online safety
- Clarification of the respective responsibilities of Ofcom, ASA and ICO

Rationale

There is currently no single government entity with oversight of online safety and online advertising, creating gaps in accountability. No single organisation holds the necessary powers, information, and expertise to effectively address harm from online advertising,¹⁶⁰ particularly in relation to age-restricted products such as gambling. Overlaps in regulatory structure and responsibility make enforcement time-consuming and difficult. Currently, departmental accountabilities are unclear: DCMS leads the Online Advertising Programme, while DSIT has oversight over the implementation of the Online Safety Act (OSA) by Ofcom. Ofcom’s scope and powers have changed substantially through implementation of the OSA, blurring its remit with that of the ICO (sponsored by DSIT) and the ASA (which remains unsponsored by any government department). This structural complexity leads to inconsistent regulatory approaches and enforcement, which is particularly concerning given that online advertising is a major driver of exposure to gambling and other age-restricted content for CYP.

4.2.2 Increase government collaboration with the ASA to improve scope, monitoring and enforcement

Policy lever(s):

- Give a government department sponsorship responsibilities of the ASA
- Increase collaboration between the ASA and Ofcom
- Widen Ofcom’s scope under the OSA to include gambling content

Rationale

¹⁶⁰ Mapping online advertising issues, and industry and regulatory initiatives aimed at addressing them
<https://www.gov.uk/government/publications/mapping-online-advertising-issues-and-the-industry-and-regulatory-initiatives-aimed-at-addressing-them>

The ASA could be given increased resources and powers to broaden its scope, monitoring and enforcement activities (details below). To action this there are few levers available, such as appointing DSIT as a departmental sponsor of the ASA, facilitating greater collaboration between Ofcom and the ASA, and/or widening Ofcom's scope under the OSA to include gambling content.

- **Scope:** Although the ASA has recently closed a loophole in the regulation of content marketing,¹⁶¹ there continues to be “grey areas” that are not always covered by ASA guidance. For example, the ASA does not regulate logo sponsorship of football shirts or pitch-side hoardings,¹⁶² despite these environments being particularly influential among CYP and saturated with gambling logos.¹⁶³ This poses problems for the online environment as sports clips are widely shared online. This requires the scope of the ASA to be widened (e.g., anything showing or mentioning the name of a gambling brand to be classified as a gambling advert). Similarly, the ASA also has no jurisdiction over algorithmic targeting and engagement-driven amplification¹⁶⁴ – a key driver of exposure to gambling content among CYP, and minimal oversight of online platforms¹⁶⁵.
- **Monitoring:** Greater data sharing is needed to increase transparency in the advertising supply chain, support the ASA in its work, and more easily measure the performance of the self-regulatory system. At the moment, there is a “dark space” where neither researchers, policymakers nor enforcement officers are abreast of content online.¹⁶⁶ Information-gathering powers such as these are underpinned by legislation, meaning a government department (e.g., DSIT) would need to implement this.¹⁶⁷

The approach could mirror the EU Digital Services Act,¹⁶⁸ which has created the ability to access and monitor online ads through repositories across platforms with key information (e.g., spend, volume, content, targeting). There could also be greater use of data-sharing agreements coordinated across the ASA, Ofcom, trusted third-party

¹⁶¹ CAP Code extended to ensure consistency in regulation of online ads

<https://www.asa.org.uk/news/cap-code-extended-to-ensure-consistency-in-regulation-of-online-ads.html>

¹⁶² Remit: Sponsorship <https://www.asa.org.uk/advice-online/remit-sponsorship.html>

¹⁶³ Gambling marketing in Great Britain: What needs to change and why?

<https://www.gambleaware.org/our-research/publication-library/articles/gambling-marketing-in-great-britain-what-needs-to-change-and-why/>

¹⁶⁴ Mapping online advertising issues, and the industry and regulatory initiatives aimed at addressing them

<https://www.gov.uk/government/publications/mapping-online-advertising-issues-and-the-industry-and-regulatory-initiatives-aimed-at-addressing-them>

¹⁶⁵ Young people and gambling-related influencer content: Understanding exposure to and impact of gambling-related influencer content on young people and

identifying potential strategies for change <https://www.gambleaware.org/our-research/publication-library/articles/young-people-and-gambling-related-influencer-content-understanding-exposure-to-and-impact-of-gambling-related-influencer-content-on-young-people-and-identifying-potential-strategies-for-change/>

¹⁶⁶ Ad Overload – Rethinking Gambling Advertising Regulations in the Digital Age

<https://gamblingharm.blogs.bristol.ac.uk/2024/02/06/ad-overload-rethinking-gambling-advertising-regulations-in-the-digital-age/>

¹⁶⁷ Mapping online advertising issues, and the industry and regulatory initiatives aimed at addressing them

<https://www.gov.uk/government/publications/mapping-online-advertising-issues-and-the-industry-and-regulatory-initiatives-aimed-at-addressing-them>

¹⁶⁸ The Digital Services Act (DSA) - Regulation (EU) 2022/2065 <https://www.eu-digital-services-act.com/>

intermediaries and gambling operators and/or platforms under the remit of the Data Use and Access Bill.¹⁶⁹¹⁷⁰

- **Enforcement:** It is concerning that the ASA, which polices much of the £42.6 billion spent on UK advertising,¹⁷¹ has minimal powers compared to Ofcom. The actions taken when an operator breaks the existing rules are limited (e.g., the advert is removed months after it was shown,¹⁷² with non-complaint advertisers listed).¹⁷³ In order to improve speed and efficiency of penalties, learnings could be taken from other areas, where regulators have been given greater powers to bypass the need to initiate court proceedings and directly impose fines (e.g., breaches of consumer protection laws¹⁷⁴, or breaking requirements from the OSA¹⁷⁵). With greater powers, companies found to be in breach of marketing rules could more swiftly receive penalties for failures¹⁷⁶, lose their licence to operate¹⁷⁷ and even hold senior managers (where they are at fault) criminally liable for non-compliance¹⁷⁸. This would require legislation, meaning a government department (e.g., DSIT) would need to implement this.

These powers need to go beyond penalising gambling companies but also other organisations within the chain, particularly as online advertising and marketing supply chains lack transparency. This joint accountability is a goal of the Online Advertising Programme¹⁷⁹ and is particularly important for disrupting unlicensed operators who illegally run advertising in the UK.¹⁸⁰ For media buyers who fail to check a gambling operator's licence number before running advertising against a UK audience could be held accountable. New powers via the Criminal Justice Bill granted to law enforcement agencies may also help disrupt unregulated operators linked to organised crime (e.g., domain name suspension, IP blocking) with effective collaboration.¹⁸¹

¹⁶⁹ New data laws unveiled to improve public services and boost UK economy by £10 billion

<https://www.gov.uk/government/news/new-data-laws-unveiled-to-improve-public-services-and-boost-uk-economy-by-10-billion>

¹⁷⁰ Researchers' access to information from regulated services

<https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/call-for-evidence-researchers-access-to-information-from-regulated-online-services/main-documents/researchers-access-to-information-from-regulated-online-services.pdf?v=399794>

¹⁷¹ UK Advertising records £42.6bn spend in 2024. <https://adassoc.org.uk/our-work/uk-advertising-records-42-6bn-spend-in-2024/>

¹⁷² ASA Ruling on LC International Ltd t/a Ladbroke's <https://www.asa.org.uk/rulings/lc-international-ltd-g25-1274110-lc-international-ltd.html>

¹⁷³ Non-compliant online advertisers <https://www.asa.org.uk/codes-and-rulings/non-compliant-online-advertisers.html>

¹⁷⁴ UK expands its merger control regime and the CMA's powers with the Digital Markets, Competition & Consumers Act

<https://www.whitecase.com/insight-alert/uk-expands-its-merger-control-regime-and-cmas-powers-digital-markets-competition>

¹⁷⁵ Social media faces big changes under new Ofcom rules

<https://www.bbc.co.uk/news/articles/ci0467e9e430#:~:text=The%20Online%20Safety%20Act%20aims,their%20businesses%20in%20the%20UK>

¹⁷⁶ Greentube Alderney Limited to pay £1m for regulatory failures

<https://www.gamblingcommission.gov.uk/news/article/greentube-alderney-limited-to-pay-gbp1m-for-regulatory-failures>

¹⁷⁷ Consumer information notice: Stake leaving GB market

<https://www.gamblingcommission.gov.uk/news/article/consumer-information-notice-stake-leaving-gb-market>

¹⁷⁸ Online Safety Act: explainer

<https://www.gov.uk/government/publications/online-safety-act-explainer/online-safety-act-explainer#the-new-offences-that-the-act-has-introduced>

¹⁷⁹ Government response to Online Advertising Programme consultation <https://www.gov.uk/government/consultations/online-advertising-programme-consultation/outcome/government-response-to-online-advertising-programme-consultation>

¹⁸⁰ Gambling addicts searching on Google for help bombarded with ads for online casinos

<https://www.independent.co.uk/news/business/news/google-gambling-adverts-online-casinos-targeting-gamstop-a9269661.html>

¹⁸¹ Criminal Justice Bill: Overarching factsheet

<https://www.gov.uk/government/publications/criminal-justice-bill-2023-factsheets/criminal-justice-bill-overarching-factsheet>

4.3 Increasing action by online platforms

More action should be taken to shift responsibility onto the commercial entities that profit from online marketing and content, building on the progress made within the OSA.

4.3.1 Increase accountability on online platforms

Policy lever(s):

- Introduce a requirement for “safety by design” on all online platforms.
- Introduce a standard of proof, similar to the financial services sector “Consumer Duty.” to online platforms that host gambling marketing and content.
- Increase algorithmic transparency and reporting.

Rationale

Introducing a requirement for “safety by design” to all online platforms places the onus on the provider rather than on the consumer.¹⁸² For example, the Consumer Duty sets a higher standard of consumer protection in financial services requiring banks to avoid causing foreseeable harm. Positively, this has led to increased action among financial institutions to reduce gambling harms¹⁸³. A similar standard of proof could be applied to online platforms that host gambling marketing and content to avoid foreseeable harm. The OSA initially contained “safety by design” principles, but the final legislation fell short of including this.¹⁸⁴ Platforms should also provide users (and regulators) visibility into how gambling content is targeted and amplified through algorithms, alongside submitting evidence that they are not exposing CYP to age-restricted gambling content. This would likely require legislation led by a government department (e.g., DSIT).

4.3.2 Increase age protections on online platforms

Policy lever(s):

- Implement robust age assurance to view all gambling content.
- Implement opt-out defaults which are cross-platform.
- Strengthen device-level age verification on internet-enabled devices.

Rationale

Requiring online platforms to implement robust age assurance systems for all gambling-related content beyond paid advertisements (e.g., algorithmically recommended content, influencer / promotional posts, content that normalises gambling) ensures that platforms cannot “hide” gambling promotion behind non-advertising format, and stops algorithmic feeds continuing to expose children to age-restricted content. These measures would align online gambling regulation with best practice in digital safety, and also with some of the ambitions of the OSA.

¹⁸² Principles of safer online platform design <https://www.gov.uk/guidance/principles-of-safer-online-platform-design#what-is-a-safety-by-design-approach>

¹⁸³ The Gambling Harms Action Lab <https://www.moneyandmentalhealth.org/gambling-harms/>

¹⁸⁴ OSA Network statement on illegal harms consultation <https://www.onlinesafetyact.net/analysis/osa-network-statement-on-illegal-harms-consultation/>

Although some platforms (e.g., Meta,¹⁸⁵ Snapchat)¹⁸⁶ give users more control of paid advertising (e.g., ability to hide ads, block certain accounts and advertisers, and mute keywords from appearing in their feeds)¹⁸⁷ this has its drawbacks. For example, it does not prevent content being shared through algorithms but instead predominantly applies to paid advertising. It also requires users to opt-in rather than opt-out and does not apply across platforms, making it much harder and time-consuming for CYP and those experiencing harms to avoid gambling content.

Although greater collaboration is needed internationally to reduce the ease at which local restrictions can be bypassed through VPNs, device-based verification on internet-enabled devices (e.g., smartphones, tablets, consoles) offers a potential short-term solution. Device-based age verification enforces age restrictions on the device, applying restrictions across all websites, platforms and services, enabling universal coverage across international platforms.¹⁸⁸ Private data is only shared with a single operating system rather than across multiple websites, reducing privacy risks. It also prevents parents needing to familiarise themselves with different protective controls across various apps and websites.¹⁸⁹ The responsible body for this work would likely be DSIT.

4.4 Ensuring existing government programmes on online advertising and content work towards reducing gambling harms

There are two government-led workstreams in progress, which could be leveraged to restrict gambling marketing and content online, if their scope is broadened. However, there lacks a single point of oversight, with responsibility shared between DCMS and DSIT across different areas of the online environment. The lack of action to reduce gambling harm through these workstreams to date is a missed opportunity.

4.4.1 The Online Advertising Programme

The Online Advertising Programme, led by DCMS, aims to build a fit-for-purpose, agile regulatory framework, that protects internet users, particularly under-18s, from bad actors and online advertising fraud, illegal content and illegal adverts. It is disappointing that the legislative change originally suggested has not yet been progressed.¹⁹⁰ However, there are

¹⁸⁵ Removing Certain Ad Targeting Options and Expanding Our Ad Controls

<https://www.facebook.com/business/news/removing-certain-ad-targeting-options-and-expanding-our-ad-controls>

¹⁸⁶ Snapchat launches opt-out option for gambling ads in the UK

<https://igamingbusiness.com/marketing-affiliates/marketing-regulation/snapchat-launches-opt-out-option-for-gambling-ads-in-the-uk/>

¹⁸⁷ High stakes: gambling reform for the digital age

<https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age/high-stakes-gambling-reform-for-the-digital-age>

¹⁸⁸ Device-Based Age Verification: A Safer, Smarter Solution for Kids

<https://digitaldefendersunited.org/what-we-do/f/device-based-age-verification-a-safer-smarter-solution-for-kids>

¹⁸⁹ Press Release: Statement on Age Verification <https://www.icmec.org/press/statement-on-age-verification/>

¹⁹⁰ Online Advertising Taskforce action plan

<https://www.gov.uk/government/publications/online-advertising-taskforce-action-plan/online-advertising-taskforce-action-plan>

elements of the self-regulatory strand of the programme, the Online Advertising Taskforce.¹⁹¹ which could play a role in reducing harm from online gambling advertising:

- **Age Assurance:** This looks to improve standards of age assurance to reduce children's exposure to advertising for age-restricted products. This work should be expanded beyond alcohol to also include gambling. If progressed, the workstream to measure ads to eligible audiences (in line with the CAP Code) will be particularly relevant.
- **Gold Standard:** This aims to create minimum standards for buyers and sellers of digital media focused on ad fraud (e.g., scam ads). This workstream could consider those outside of GB which advertise their services as "not on GamStop"¹⁹² to attract players who have self-excluded, driving individuals into the unregulated market.¹⁹³
- **Influencer marketing:** This seeks to identify and agree better standards for influencer advertising. It has resulted in an updated influencer code of conduct,¹⁹⁴ which positively signposts to CAP guidance for age-restricted products, including gambling. However, it is unclear what the impact of this will be without independent monitoring and evaluation.
- **Information sharing:** This aims to improve information sharing mechanisms. If successful, this mechanism could be expanded to age restricted ads such as gambling rather than just scam adverts.
- **Intermediary and Platform Principles (IPP):** This aims to promote advertisers' awareness of the rules online and helps the ASA remove persistently non-complying ads online. It is positive that the pilot raised awareness of age-targeting restrictions on ads for gambling,¹⁹⁵ but the next steps are unclear.
- **Research:** This aims to produce research about the origin, prevalence, and impact of harmful ads. Despite this research showing parents report gambling as the second most likely product to be inappropriately shown to their children online, there lacks further action trying to address this high exposure.¹⁹⁶

4.4.2 The Online Safety Act

The Online Safety Act (OSA), led by DSIT and implemented by Ofcom, was designed to improve online safety for both children and adults. It establishes duties for regulated online platforms, including user-to-user services and search engines, to mitigate illegal content and content likely to be harmful to children (e.g., encouraging self-harm, cyberflashing) but does not cover age-inappropriate content such as gambling marketing.

¹⁹¹ Online Advertising Taskforce - progress report 2023-24

<https://www.gov.uk/government/publications/online-advertising-taskforce-progress-report-2023-24/online-advertising-taskforce-progress-report-2023-24>

¹⁹² Illegal online gambling - Phase 1: Exploring consumer pathways into using illegal gambling websites <https://www.gamblingcommission.gov.uk/report/illegal-online-gambling-phase-1-exploring-consumer-pathways-into-using/self-excluders-main-findings-illegal-online-gambling-phase-1>

¹⁹³ UKGC responds to 'shameless' no-GamStop casino ad run via global PR wire <https://sbcnews.co.uk/europe/uk/2025/05/15/ukgc-gamstop-black-market/>

¹⁹⁴ ISBA & IMTB Influencer Marketing Code of Conduct - Version 4 <https://www.isba.org.uk/knowledge/isba-imtb-influencer-marketing-code-conduct-version-4>

¹⁹⁵ Intermediary and Platform Principles Pilot - Final Report <https://www.asa.org.uk/resource/intermediary-and-platform-principles-pilot-final-report.html>

¹⁹⁶ Online advertising experiences survey - research report <https://www.gov.uk/government/publications/online-advertising-experiences-survey-research-report>

There have been criticisms of the OSA, such as proposals being weakened,¹⁹⁷ a lack of focus on “safety by design” principles¹⁹⁸ and being ineffective at addressing the underlying effect of social media business models (e.g., incentivising influencers financially to propagate harmful content to CYP).¹⁹⁹ The OSA does not cover paid-for advertising, unless it is fraudulent, whilst the unclear definitions of ‘users’ and ‘services’²⁰⁰ has produced a shortfall in effective regulation as user generated content is often indistinguishable from online advertising.²⁰¹

The OSA is another missed opportunity to reduce gambling harms through restricting gambling content and marketing. Specifically, gambling harm is not categorised as a harm and therefore not within scope of the rules. This is despite OfCom’s own research showing that content encouraging gambling is in the top five harms experienced by children aged 13-17 online.²⁰²

However, there are ways in which the implementation of the OSA²⁰³ could work towards reducing harm from online gambling advertising:

- **Illegal content:** The Act requires all companies to take robust action against illegal content (e.g., fraud, terrorism, sexual abuse). Platforms must do more to reduce the likelihood of criminal activity on platforms, and put systems in place for removing illegal content when it does appear. If the scope was tweaked, then content could include “not on GamStop” advertising that is driving individuals into the illegal market.²⁰⁴
- **Content that is harmful to children:** Although some content is not illegal, it could be harmful or age-inappropriate for children and platforms now have a responsibility to protect children from it. This content is either categorised as primary priority content (e.g., pornography, self-harm, eating disorders) or priority content (e.g., bullying, hateful content). There is robust evidence that exposure to gambling marketing increases the likelihood of gambling initiation, normalises gambling as risk-free, and drives harm among CYP.²⁰⁵ Unlike other harmful content categories listed gambling content is pervasive, commercial, and designed to drive engagement, making its impacts more insidious and cumulative. By explicitly classifying harmful gambling content as “harmful to children” Ofcom could enforce safeguards, age-appropriate controls, and risk mitigation measures, closing a critical gap in protection.

¹⁹⁷ Online Safety Newsletter <https://mailchi.mp/a1956b0126b5/osa-network-online-safety-newsletter-17436007?e=6cf6aab125>

¹⁹⁸ OSA Network statement on illegal harms consultation <https://www.onlinesafetyact.net/analysis/osa-network-statement-on-illegal-harms-consultation/>

¹⁹⁹ Making the UK the safest place to be online - a progress review for Safer Internet Day <https://www.onlinesafetyact.net/analysis/making-the-uk-the-safest-place-to-be-online-a-progress-update-for-safer-internet-day/>

²⁰⁰ Advertising and the Online Safety Act 2023 [Advertising and the Online Safety Act 2023 - Online Safety Act](https://www.gamblingcommission.gov.uk/report/illegal-online-gambling-phase-1-exploring-consumer-pathways-into-using/self-excluders-main-findings-illegal-online-gambling-phase-1)

²⁰¹ Policy Briefing Online Advertising Regulation Branded Content Governance Project https://www.arts.ac.uk/_data/assets/pdf_file/0039/398892/Online-Advertising-Regulation_Policy-Briefing.pdf

²⁰² Online Nation 2023

<https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/online-nation/2023/online-nation-2023-report.pdf?v=368355>

²⁰³ Online Safety Act: explainer

<https://www.gov.uk/government/publications/online-safety-act-explainer/online-safety-act-explainer#what-does-the-online-safety-act-do>

²⁰⁴ Illegal online gambling - Phase 1: Exploring consumer pathways into using illegal gambling websites <https://www.gamblingcommission.gov.uk/report/illegal-online-gambling-phase-1-exploring-consumer-pathways-into-using/self-excluders-main-findings-illegal-online-gambling-phase-1>

²⁰⁵ What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature <https://www.sciencedirect.com/science/article/pii/S0033350622003420>

There may also be learnings from the OSA for policymakers to consider when trying to reduce exposure to gambling content online such as increased; enforcement powers (e.g., financial fines, criminal liability of senior managers), age verification requirements, and tools to reduce exposure to certain categories of content.

4.5 Tightening existing self-regulatory measures

The Minister for Gambling has stated that self-regulation is the preferred approach to improving the online environment.²⁰⁶ GambleAware strongly believes, with evidence underpinning this, that rules designed and policed by the very organisations they intend to hold accountable, will not be effective. Improvements to self-regulation must be made in parallel to establishing better external regulation, as set out above. Although there are gambling-specific codes (e.g., industry code for socially responsible advertising)²⁰⁷ and advertising-specific codes (e.g., influencer code of conduct)²⁰⁸ the ASA's code arguably represents the best route for change. This is due to the ability (albeit limited) to monitor and enforce change – especially if there is increased collaboration with the regulatory backstop Ofcom. Below outlines potential priority areas for the ASA, but some may require legislative action by the government.

4.5.1 Further restrictions on what content and tactics are “appealing” to children

Policy lever(s):

- Tighten the BCAP/CAP code on what “appeals” to children

Rationale

Various factors have a strong impact on an individuals' perceptions towards an activity (e.g., normalising the activity as harmless and something that everyone does) which increases the likelihood of CYP engaging with the behaviour and experiencing harms as a result. Recent GambleAware research supports the introduction of a broader interpretation of ‘strong appeal’, moving beyond simply ‘liking’ an individual to other factors including trust and admiration.²⁰⁹ It also suggests that “one size fits all” approach may not work given the depth of appeal among certain subgroups and topics (e.g., the high appeal of sports among boys aged 16-17). More detail can be found in the next section of the report. The responsible body is the ASA.

4.5.2 Further restrictions on the targeting of gambling advertising

Policy lever(s):

- Tighten the current “25% rule” within the CAP code to ensure age-restricted products have minimal exposure to children

²⁰⁶ Baroness Twycross speech at GambleAware Annual Conference <https://www.gov.uk/government/speeches/baroness-twycross-speech-at-gambleaware-annual-conference#:~:text=For%20me%20and%20the%20Government,of%20harm%20are%20better%20protected.>

²⁰⁷ Industry Group for Responsible Gambling <https://bettingandgamingcouncil.com/members/igrg>

²⁰⁸ ISBA & IMTB Influencer Marketing Code of Conduct - Version 4 <https://www.isba.org.uk/knowledge/isba-imtb-influencer-marketing-code-conduct-version-4>

²⁰⁹ The Appeal of Celebrity Ambassadors to Children & Young People Aged 11-17. [https://www.gambleaware.org/our-research/publication-library/articles/sherbert-research-the-appeal-of-celebrity-ambassadors-to-children-young-people-aged-11-17/.](https://www.gambleaware.org/our-research/publication-library/articles/sherbert-research-the-appeal-of-celebrity-ambassadors-to-children-young-people-aged-11-17/)

Rationale

The CAP code states that advertisements for certain age-restricted products like alcohol and gambling must not be placed in media if under-18s make up 25% or more of the audience.²¹⁰ Under 18s make up around 20% of the GB population,²¹¹ meaning that this policy promotes the over-indexing of age-restricted products to children. A common sense approach is all that is needed to lower the threshold. This ensures that gambling is not advertised in environments where children are more likely to be. The responsible body is the ASA.

4.5.3 Ground guidance in the lived experience of children and those who have experienced gambling harms

Policy lever(s):

- Set up a panel of children to judge whether advertising is appealing
- Set up a panel of those with lived experience of gambling harms to judge whether advertising is “socially responsible”

Rationale

There is currently an over-reliance on inadequate social media data as a proxy for ‘strong appeal’ amongst children. Metrics such as likes or shares are limited and may not reflect underlying psychological impact, peer influence, or aspirational factors such as trust, admiration and social acceptance. Children should be involved in policymaking via traditional research and engagement,²¹² especially to support decision-making given the challenges of adults judging what is of appeal to children.²¹³ Although it is positive that the ASA has recently conducted research among children to inform their guidelines,²¹⁴ it is unclear how the stark findings, such as the increased risk among older boys through gambling messages in sport, will change their guidance and alter their previous rulings of relevance. Similarly, those with lived experience of gambling harms could offer valuable insight into how to minimise harm among those affected by gambling harms.²¹⁵ The responsible body is the ASA.

4.5.4 Clarify definition of “vulnerability” to make it easier to identify malpractice

Policy lever(s):

- Provide an updated definition of “vulnerable” to reflect a public health approach which recognises vulnerability is not static and applies to all of us.

²¹⁰ New guidance on targeting age-restricted ads online

<https://www.asa.org.uk/news/new-guidance-on-targeting-age-restricted-ads-online.html>

²¹¹ Estimates of the population for the UK, England, Wales, Scotland, and Northern Ireland

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

²¹² New report: Young people’s views on gambling and gaming

<https://www.alliance-scotland.org.uk/blog/news/new-report-young-peoples-views-on-gambling-and-gaming/>

²¹³ Priming Young Minds: The Appeal of Gambling Advertising to Children and Young People <https://www.journals.uchicago.edu/doi/10.1086/729290>

²¹⁴ Research on the ‘strong appeal’ of personalities in advertising to young people

<https://www.asa.org.uk/resource/research-on-the-strong-appeal-of-personalities-in-advertising-to-young-people.html>

²¹⁵ Involving lived experience in regional efforts to address gambling-related harms: going beyond ‘window dressing’ and ‘tick box exercises’

<https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-024-17939-7>

Rationale

The White Paper reiterated the ambition of the 2005 Gambling Act that “children and vulnerable people should be protected.”²¹⁶ However, “vulnerable” was not defined within the original 2005 Gambling Act and is often only interpreted as those already experiencing a high level of harm from gambling. The National Audit Office has previously critiqued the Gambling Commission for not effectively articulating how it interprets which consumers may be vulnerable and when.²¹⁷ The Gambling Commission could build on their current guidance²¹⁸ to reflect a public health approach which recognises vulnerability is not static and applies to all of us.²¹⁹ Research shows that people from all walks of life can experience gambling harms, and the oversaturation of gambling marketing poses risks for everyone. Clarity on vulnerability would make it easier for the ASA to crack down on irresponsible adverts due to the enhanced legal requirements. The responsible bodies are DCMS and the Gambling Commission.

4.6 Government to consider emerging areas for new and targeted policies

There is an important opportunity for the UK Government to be a world-leader in establishing innovative policies and building the evidence in online safety through evaluation (a similar approach has been taken for the White Paper review).²²⁰ These targeted policies will have limited impact without the wider facilitators of change being implemented. Specifically, there may not be an overall reduction in exposure to gambling content due to these policies not impacting unregulated operators, and/or regulated gambling operators diverting marketing spend to other media channels (e.g., broadcast) or marketing tactics (e.g., sponsorships).

A taskforce is needed to convene expertise across government departments and regulators to identify, scope and prioritise targeted policies. This could be underpinned by a deliberative engagement event (e.g., citizen’s assembly) which puts the public²²¹ at the heart of decision making through informed discussions, diverse perspectives, and understanding lived experiences. It differs from other forms of engagement in that it allows those involved to spend time considering and discussing an issue at length before they come to a considered view. This form of engagement can lead to more trustworthy decisions,²²² which should help build trust and relationships between government and citizens more broadly.

²¹⁶ High stakes: gambling reform for the digital age

<https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age/high-stakes-gambling-reform-for-the-digital-age>

²¹⁷ Gambling regulation: problem gambling and protecting vulnerable people

<https://www.nao.org.uk/reports/gambling-regulation-problem-gambling-and-protecting-the-vulnerable/>

²¹⁸ What do we mean by vulnerability? <https://www.gamblingcommission.gov.uk/about-us/guide/page/vulnerability-statement-what-do-we-mean-by-vulnerability>

²¹⁹ Gambling advertising, marketing and sponsorship: the need for action <https://cega.org.uk/#evidence>

²²⁰ Gambling Act Review evaluation plan <https://www.gov.uk/guidance/gambling-act-review-evaluation-plan>

²²¹ Deliberative Engagement Best Practice Guide <https://www.ipsos.com/en-uk/deliberative-engagement-best-practice-guide>

²²² Trust in trouble: how deliberative approaches can help us do democracy differently

<https://natcen.ac.uk/trust-trouble-how-deliberative-approaches-can-help-us-do-democracy-differently>

Some examples of targeted policies have been included within the appendix. In particular, signposting to gambling support alongside effective health warnings should be a minimum requirement on gambling marketing and content online. This could be included within scope of the ongoing cross-departmental group of safer gambling messaging²²³.

5. Conclusion

Based on the evidence presented, it is clear that gambling marketing and content online is falling through the cracks when it comes to regulation and protecting consumers. Children are being increasingly exposed to age-restricted materials before an age at which they are able to critically evaluate it. Additionally, existing harm among those communities that already bear a disproportionate burden is being exacerbated by marketing and content.

Urgent action must be taken by the Government and other decision-making bodies to bring online marketing and content into the digital age. It is evident that a clear line of accountability and oversight from government is needed to coordinate regulatory and self-regulatory activities. Too often is the burden of proof on those who believe that the current status quo is operating harmfully, rather than on those who benefit commercially.

GambleAware is calling for the Government to further restrict online gambling marketing and content, alongside ensuring this is within scope for recommendations arising from the cross-departmental Safer Gambling Messaging Group. Rather than calling for a blanket ban, we have outlined a pragmatic framework of policy and regulatory levers that could be used to reduce harm.

²²³ Public health gambling messaging intervention <https://behscipru.nihr.ac.uk/our-projects/public-health-gambling-messaging-intervention/>

6. Appendix

The below provides more information to accompany section 4.6 “government to consider emerging areas for new and targeted policies”. As mentioned, a taskforce is needed to convene expertise across government departments and regulators to identify, scope and prioritise evidence-led policies such as those outlined below.

6.1 Explore protective messages on gambling marketing and content

Potential targeted policy

- Make signposting to gambling support and health warnings a mandatory requirement when the name or logo of a gambling company is spoken/shown within online content.

Rationale

- Signposting helps to normalise support seeking and increases awareness and uptake of the advice, tools and support offered by organisations working to reduce harm.
- Health warnings and evidence-based safer gambling messaging provide information on the harmful effects of gambling.
- These changes are a low-cost and high-reach intervention that may help to mitigate gambling-related harms in GB,²²⁴ and an important part of a comprehensive public health approach.²²⁵
- This intervention is especially important to rebalance gambling exposure to CYP. Children report a high level of exposure to gambling adverts but are less likely to recall health messaging on them. This shows that health-related messages need to be more commonly used by operators, and more prominent when used.²²⁶
- Given the issues with identifying non-traditional marketing tactics (e.g., content marketing),²²⁷ warnings could help bring greater consistency across different types of marketing – making them more easily identifiable. This could also serve as a potential differentiator to black market operators, who are unlikely to use such warnings.
- We welcome the Government’s cross-departmental working group on safer gambling messaging and we are calling for the group to consider online marketing and content in scope of recommendations.²²⁸ We encourage the working group to review of all the evidence on this topic rather than just those published in academic journals.²²⁹ We

²²⁴ Visibility of age restriction warnings, harm reduction messages and terms and conditions: a content analysis of paid-for gambling advertising in the UK. <https://www.sciencedirect.com/science/article/pii/S0033350620301098?via%3Dihub>

²²⁵ Public health gambling messaging intervention <https://behscipru.nihr.ac.uk/our-projects/public-health-gambling-messaging-intervention/>

²²⁶ The effect of marketing and advertising on children, young people and vulnerable people Quantitative Research Report <https://www.gambleaware.org/our-research/publication-library/publication-library/the-effect-of-marketing-and-advertising-on-children-young-people-and-vulnerable-people-quantitative-research-report/>

²²⁷ Priming Young Minds: The Appeal of Gambling Advertising to Children and Young People <https://www.journals.uchicago.edu/doi/10.1086/729290>

²²⁸ High stakes: gambling reform for the digital age <https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age/high-stakes-gambling-reform-for-the-digital-age>

²²⁹ Effectiveness of Public Messaging Within the Gambling Domain: A Systematic Review <https://link.springer.com/article/10.1007/s11469-024-01414-w>

would particularly encourage the inclusion of the extensive and widely recognised grey literature from organisations such as the Gambling Commission, Behavioural Insights Team and GambleAware.²³⁰

Limitations

- It will not reduce exposure to gambling marketing and content online.
- Messages cannot be tailored to different audiences (e.g., children who should not see them but do, those experiencing harms).
- If created by industry they may lack effectiveness^{231,232} could stigmatise those experiencing harms²³³ and contribute to an increase in gambling²³⁴.
- If not implemented correctly (e.g., too small, lack of visual clarity, lack of separation from operator messaging) or inconsistently, messages will be difficult to read and the impact will be limited. GambleAware is concerned that if changes were implemented via the voluntary industry code, there would continue to be inaccuracies and inconsistencies in application.
- If there is just one message, rather than a pool of messages that are rotated, viewers are at risk of becoming desensitised and ignore the message.²³⁵
- If messages are not developed in collaboration with lived experience representatives, they may not resonate with those experiencing harms.²³⁶

6.2 Explore restrictions on inducement marketing

Potential targeted policy

- Ban the usage of inducement marketing where it includes wagering requirements.

Rationale

- The Gambling Commission²³⁷ has prohibited the promotion of mixed products and capped wagering requirements to 10, but this could go further.
- Inducement advertising (e.g., free spins/bets, deposit bonuses, money back if bet loses, odds boosts)²³⁸ leads to participation in new gambling activities²³⁹ alongside an

²³⁰ Executive summary: Improving safer gambling messaging on operator advertising <https://www.gambleaware.org/our-research/publication-library/articles/executive-summary-improving-safer-gambling-messaging-on-operator-advertising/>

²³¹ "When the Fun Stops, Stop": An analysis of the provenance, framing and evidence of a 'responsible gambling' campaign <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0255145>

²³² Evaluation of the 'take time to think' safer gambling message: a randomised, online experimental study <https://www.cambridge.org/core/services/aop-cambridgecore/content/view/9CFD881028DB7C1CF0E83AD6AE6D67A/S2398063X23000027a.pdf/evaluation-of-the-take-time-to-think-safergambling-message-a-randomised-online-experimental-study.pdf>

²³³ Editorial: Gambling, stigma, suicidality, and the internalization of the 'responsible gambling' mantra <https://www.frontiersin.org/journals/psychiatry/articles/10.3389/fpsyt.2023.1214531/full>

²³⁴ Impact of the "when the fun stops, stop" gambling message on online gambling behaviour: a randomised, online experimental study <https://www.thelancet.com/action/showPdf?pii=S2468-2667%2821%2900279-6>

²³⁵ How do academics, regulators, and treatment providers think that safer gambling messages can be improved? <https://www.tandfonline.com/doi/full/10.1080/16066359.2022.2148663#abstract>

²³⁶ Let's Open Up About Gambling: Stigma reduction campaign evaluation <https://www.gambleaware.org/our-research/publication-library/articles/lets-open-up-about-gambling-stigma-reduction-campaign-evaluation/>

²³⁷ Gambling promotions to be safer and simpler <https://www.gamblingcommission.gov.uk/news/article/gambling-promotions-to-be-safer-and-simpler>

²³⁸ Financial inducements in gambling marketing: An information disclosure proposal to inform gamblers of their true economic value https://osf.io/preprints/osf/3kytp_v1

²³⁹ Exploring consumer journeys using gambling promotional offers and incentives <https://www.gamblingcommission.gov.uk/report/exploring-consumer-journeys-using-gambling-promotional-offers-and-incentives/consumer-understanding-and-engagement-exploring-consumer-journeys-using>

increase in gambling frequency, intensity and other high-risk behaviours, especially among those experiencing problems with gambling.²⁴⁰ Inducements also have been found to cause decision errors (e.g., more likely to choose “bad bets”).²⁴¹

- This type of advertising is misleading due to being widely considered to be without risk.²⁴² Marketing language can also reinforce belief that engagement is genuinely free, despite many offers having wagering requirements^{ibid}. Most people are not able to calculate how much they would need to bet to meet a wagering requirement.²⁴³
- Inducements and risk-reducing promotions are highly appealing to children due to their implied ‘risk-free’ nature.²⁴⁴

Limitations

- Only applies to inducement marketing, rather than wider forms of marketing.
- A lack of a clear definition of what ‘inducements’ include may lead to operators circumventing restrictions. One study detailed 15 distinct types of inducements, demonstrating the challenge.²⁴⁵
- Some have suggested that restricting inducements among regulated operators could push customers to unregulated operators, who are able to promote inducements.²⁴⁶ However, there lacks robust evidence independent of industry-influence for this.

6.3 Explore restrictions on content marketing

Potential targeted policy

- A ban of gambling operators using content marketing on their social media channels.

Rationale

- As outlined previously, the lower costs of content online, especially through owned channels such as social media, leads to a higher volume of content compared to other channels. This makes it challenging to monitor compliance. Volume caps could help ease the burden on regulators and reduce the proliferation of marketing online. 40% of all gambling adverts on social media are content marketing making it a priority for targeted efforts.²⁴⁷

²⁴⁰ Impact of wagering inducements on the gambling behaviors of on-line gamblers: A longitudinal study based on gambling tracking data <https://onlinelibrary.wiley.com/doi/full/10.1111/add.15665>

²⁴¹ Effects of inducements on sports gambling and decision-errors: An experimental study <https://akjournals.com/view/journals/2006/14/2/article-p959.xml>

²⁴² Exploring consumer journeys using gambling promotional offers and incentives <https://www.gamblingcommission.gov.uk/report/exploring-consumer-journeys-using-gambling-promotional-offers-and-incentives/consumer-understanding-and-engagement-exploring-consumer-journeys-using>

²⁴³ Should wagering requirements on gambling bonus offers be capped? <https://www.bi.team/publications/should-wagering-requirements-on-gambling-bonus-offers-be-capped/>

²⁴⁴ Protecting children and young people from contemporary marketing for gambling https://academic.oup.com/heapro/article/38/2/daac194/7080461?login=false#google_vignette

²⁴⁵ The Structural Features of Sports and Race Betting Inducements: Issues for Harm Minimisation and Consumer Protection <https://link.springer.com/article/10.1007/s10899-016-9642-6>

²⁴⁶ Shock new study reveals 1.5m brits stake up to £4.3bn on illegal gambling black market each year <https://bettingandgamingcouncil.com/news/shock-new-study>

²⁴⁷ “Get a £10 Free Bet Every Week!”—Gambling Advertising on Twitter: Volume, Content, Followers, Engagement, and Regulatory Compliance <https://journals.sagepub.com/doi/10.1177/0743915621999674>

- As outlined previously, some forms of marketing are more explicit, whilst other types, particularly content marketing,²⁴⁸ act as an implicit persuasion technique and are more difficult to identify as advertising.²⁴⁹
- Content marketing is almost four times more appealing to CYP compared to adults, and much more likely to evoke positive emotions among CYP. ^{Ibid}
- A ban is easier to implement compared to a volume cap, which would require greater data sharing, monitoring and enforcement activities.

Limitations

- Not all gambling content marketing comes from operators' own pages. Other pages (e.g., meme pages, influencers' profiles) clip content and share through their own channels. Some of this is done with the permission of the content creator, but this doesn't always happen.
- Some operator social media pages may cover different regulatory markets within an area, meaning that some operators may need to set up a specific GB social media pages to ensure restrictions can be monitored effectively.
- Specific unregulated sites (e.g., Stake)²⁵⁰ have flooded online environments with content marketing that includes the 'Stake' banner across viral content. This measure would do nothing to reduce exposure to this type of content.

6.4 Explore restrictions on who represents gambling companies

Potential targeted policy

- Ban individuals such as influencers, celebrities and tipsters from representing gambling companies.

Rationale

- There is evidence to suggest that individuals representing gambling companies have a disproportionate impact on CYP and those experiencing harm. Research supports a broader interpretation of 'strong appeal', moving beyond simply 'liking' an individual to show other factors that influence perceptions and behaviour (e.g., trust, admiration) and hence represent the threat of serious harm to CYP²⁵¹.
- The current approach is difficult to implement due to individuals being able to become "well-known" overnight due to online viral content, alongside the depth of appeal among certain groups (e.g., boys aged 16-17 are particularly influenced by sports-related individuals²⁵²) undermining a one size fits all approach.

²⁴⁸ Clearly (not) identifiable – The recognisability of gambling content marketing
<https://journals.sagepub.com/doi/10.1177/14707853241292953?cid=int-si-abstract-citing-articles.5>

²⁴⁹ Priming Young Minds: The Appeal of Gambling Advertising to Children and Young People <https://www.journals.uchicago.edu/doi/10.1086/729290>

²⁵⁰ Content-based marketing. The secret behind Stake's success <https://igamingexpress.com/content-based-marketing-the-secret-behind-stakes-success/>

²⁵¹ The Appeal of Celebrity Ambassadors to Children & Young People Aged 11-17. <https://www.gambleaware.org/our-research/publication-library/articles/sherbert-research-the-appeal-of-celebrity-ambassadors-to-children-young-people-aged-11-17/>

²⁵² Research on the 'strong appeal' of personalities in advertising to young people
<https://www.asa.org.uk/resource/research-on-the-strong-appeal-of-personalities-in-advertising-to-young-people.html>

- **Influencers:** CYP who follow gambling influencers are more likely to engage in high-risk behaviours such as using promo codes, experimenting with crypto casinos, and gambling online.²⁵³ Certain tactics build parasocial relationships which can build trust²⁵⁴ and increase the likelihood of individuals engaging in promoted behaviours such as gambling²⁵⁵.
- **Celebrity ambassadors:** Celebrity endorsements are particularly impactful for CYP, with several high-profile figures - such as former sports stars and current pundits like Peter Crouch²⁵⁶, Micah Richards²⁵⁷ and Thierry Henry²⁵⁸ - representing gambling companies. Research from GambleAware has shown that some children felt influenced or encouraged to gamble, or engaged in gambling-like activities, after seeing people they admired doing so.²⁵⁹ Celebrity endorsements can present gambling as 'harmless fun' or portray it as a cool and exciting. This is important as even when children do not 'like' a celebrity, simply recognising them can influence how gambling is perceived.²⁶⁰
- **Tipsters:** Messages from tipsters are often seen as trusted, with the amount of content shared driving people to gambling more and potentially leading to harms.²⁶¹ Tipster groups can also drive individuals to gamble through building a sense of community and framing gambling as something that everyone does.²⁶² Some tipsters are incentivised to target bettors with high-loss potential and people at-risk of gambling harm and engage in deceptive and predatory practices likely to attract vulnerable people.²⁶³
- Two in three (67%) children aged 11-17 agree that famous celebrities / individuals / influencers should NOT be allowed to promote gambling.²⁶⁴

Limitations

- Only applies to individual-based marketing, rather than wider forms of marketing.
- It will not impact the activities of unregulated operators, who have used highly appealing figures (e.g., Drake) and partner with influencers to teach children how to bypass local gambling regulations to gamble on crypto-casinos.²⁶⁵

²⁵³ Young people and gambling-related influencer content: Understanding exposure to and impact of gambling-related influencer content on young people and identifying potential strategies for change <https://www.gambleaware.org/our-research/publication-library/articles/young-people-and-gambling-related-influencer-content-understanding-exposure-to-and-impact-of-gambling-related-influencer-content-on-young-people-and-identifying-potential-strategies-for-change/>

²⁵⁴ Influencer Marketing: How Message Value and Credibility Affect Consumer Trust of Branded Content on Social Media. Accessible [here](#).

²⁵⁵ Young people's views about the use of celebrities and social media influencers in gambling marketing <https://academic.oup.com/heapro/article/39/1/daae012/7604737?login=false>

²⁵⁶ ASA Ruling on PPB Counterparty Services Ltd t/a Paddy Power <https://www.asa.org.uk/rulings/ppb-counterparty-services-ltd-g22-1176149-ppb-counterparty-services-ltd.html>

²⁵⁷ ASA Ruling on Bonne Terre Ltd t/a Sky Bet <https://www.asa.org.uk/rulings/bonne-terre-ltd-g22-1173207-bonne-terre-ltd.html>

²⁵⁸ Betway Announce Thierry Henry as a Global Ambassador <https://blog.betway.com/football/betway-announce-thierry-henry-as-global-ambassador/>

²⁵⁹ Qualitative Research on the Lived Experience and Views of Gambling among Children and Young People <https://www.gambleaware.org/our-research/publication-library/articles/qualitative-research-on-the-lived-experience-and-views-of-gambling-among-children-and-young-people/>

²⁶⁰ The Appeal of Celebrity Ambassadors to Children & Young People Aged 11-17. <https://www.gambleaware.org/our-research/publication-library/articles/sherbert-research-the-appeal-of-celebrity-ambassadors-to-children-young-people-aged-11-17/>

²⁶¹ Tipsters and Addiction in Spain. Young People's Perception of Influencers on Online Sports Gambling <https://www.mdpi.com/1660-4601/18/11/6152>

²⁶² Gambling Harms and Coping with Marginalisation and Inequality: Marginalisation, Isolation and Criminalisation in Great Britain

<https://www.gambleaware.org/our-research/publication-library/articles/gambling-harms-and-coping-with-marginalisation-and-inequality/>

²⁶³ The 'Wild West' of Wagering Affiliate Marketing and Implications for Gambling Harm <https://link.springer.com/article/10.1007/s11469-024-01422-w>

²⁶⁴ The Appeal of Celebrity Ambassadors to Children & Young People Aged 11-17. <https://www.gambleaware.org/our-research/publication-library/articles/sherbert-research-the-appeal-of-celebrity-ambassadors-to-children-young-people-aged-11-17/>

²⁶⁵ Are crypto casinos breaking the law? <https://news.sky.com/video/are-crypto-casinos-breaking-the-law-12964535>

- May lead to more indirect or covert forms of marketing on behalf of gambling companies. Clear declarations on payment and partnerships will be needed.
- Who is restricted will have to be constantly monitored, specifically influencers to keep up with a rapidly evolving influencer culture as the CYP cohort develops.

6.5 Explore restrictions on the marketing of specific gambling activities

Potential targeted policy

- Ban the marketing of products most commonly associated with harm (e.g., online casino games and slots).

Rationale

- Not all types of gambling equate to the same risk of harm, suggesting that the regulation of products should be proportionate to the risk of harm.²⁶⁶ Those products which are more strongly associated with harm (e.g., online casino games²⁶⁷) could be banned from appearing in marketing materials.
- A similar concept was applied to the statutory levy with some types of “lower risk” gambling (e.g., Charity Lotteries) required to pay less towards Research, Prevention and Treatment compared to those more strongly associated with gambling harms.²⁶⁸

Limitations

- It may push individuals to the unregulated marketing if they continue to be allowed to promote online casino games and slots to GB customers by platforms.
- It is challenging to isolate the relative risk of products due to the impact being mediated by various different variables (e.g., personal circumstances, specific product design, safer gambling interventions).²⁶⁹
- Restrictions only being applied to a specific product will mean that operators may still target high-harm groups with other gambling activities.
- A lack of a clear definition of what exact gambling types are included may lead to operators circumventing restrictions. For example, the industry may react by developing games that have similar mechanisms and appeal to an online casino game but does not classify as such.

6.6 Explore restrictions on paid-for media targeting

Potential targeted policy

- Only allow age-based media targeting, with the age of 25 the lower limit.

²⁶⁶ The Lancet Public Health Commission on gambling [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(24\)00167-1/fulltext?ref=goodoil.news](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(24)00167-1/fulltext?ref=goodoil.news)

²⁶⁷ Relative risk of gambling products within Great Britain: Findings from a rapid literature review and secondary analysis project <https://www.gambleaware.org/our-research/publication-library/articles/relative-risk-of-gambling-products-within-great-britain-findings-from-a-rapid-literature-review-and-secondary-analysis-project/>

²⁶⁸ Government response to the consultation on the structure, distribution and governance of the statutory levy on gambling operators <https://www.gov.uk/government/consultations/consultation-on-the-statutory-levy-on-gambling-operators/outcome/government-response-to-the-consultation-on-the-structure-distribution-and-governance-of-the-statutory-levy-on-gambling-operators#part-1-the-structure-of-the-levy>

²⁶⁹ Exploring the relationship between gambling activities and Problem Gambling Severity Index (PGSI) scores <https://www.gamblingcommission.gov.uk/report/exploring-the-relationship-between-gambling-activities-and-problem-gambling/pgsi-report-introduction>

Rationale

- As outlined previously, gambling operators have enhanced data targeting and tracking capabilities online which could drive harm among specific groups. Limiting the filters available prevents irresponsible targeting of groups that are more likely to experience harms but may not necessarily constitute as “vulnerable” given the limited definition within the 2005 Gambling Act.
- Setting the minimum age filter to 25 aligns with the current industry code,²⁷⁰ and should help to reduce under 18s accidentally being exposed.

Limitations

- Only applies to paid media, rather than wider forms of marketing and content.
- Does not prevent those experiencing harms from seeing advertising (unless there are social media tools in place to help them choose to block gambling).
- Some platforms may not monitor the age of those using their services, creating a discrepancy between how different platforms implement restrictions. This could be mitigated by only allowing platforms that know the age of their users to show content.

6.7 Explore restrictions on influential environments

Potential targeted policy

- A ban on gambling marketing at sports and esports events (including removal of sponsorship logos from sports clothing, merchandise, and wider stadium/arenas).

Rationale

- Two in five aged 11-17 recall seeing gambling advertising at an in-person sports event at least once in the last week, making it one of the highest sources of awareness.²⁷¹
- This poses problems for the online environment as sports and gaming clips are widely shared online, meaning that gambling brands present within these environments are transferred online,²⁷² exponentially increasing exposure to gambling content. For example, more than 27,000 messages were shown during the opening weekend of the 2025 Premier League season, almost three times higher than in 2023.²⁷³
- Young boys are particularly influenced by this content as they are likely to be “really interested” in sports such as men’s football (72%) and Esports (28%).²⁷⁴ Boys also enjoy watching sports content and commentary,²⁷⁵ making it easy for them to be exposed and influenced by gambling content online.

²⁷⁰ Industry Group for Responsible Gambling <https://bettingandgamingcouncil.com/members/igrg>

²⁷¹ Young People and Gambling 2024: Official statistics <https://www.gamblingcommission.gov.uk/report/young-people-and-gambling-2024-official-statistics/vpg-2024-recall-of-gambling-adverts-and-promotion-frequency-of-seeing-or>

²⁷² Investigation exposing huge surge of gambling marketing at start of Premier League season prompts urgent call to kick ‘out of control’ industry into touch <https://www.bristol.ac.uk/research/groups/gambling-harms/news/2024/premier-league-2024.html>

²⁷³ Thousands of gambling ads found to breach rules during Premier League, exposing “a broken system of self-regulation” <https://www.bristol.ac.uk/news/2025/october/premier-league-gambling-ads-2025.html>

²⁷⁴ Research on the ‘strong appeal’ of personalities in advertising <https://www.asa.org.uk/resource/research-on-the-strong-appeal-of-personalities-in-advertising-to-young-people.html>

²⁷⁵ Children’s Media Lives <https://www.ofcom.org.uk/media-use-and-attitudes/media-habits-children/childrens-media-lives>

- Esports gambling marketing is substantially more appealing to children than adults, with an almost inherent appeal to CYP²⁷⁶. This is despite widespread gambling sponsors in esports (e.g., operators sponsor more than 80% of the top 50 Counter Strike 2 teams).²⁷⁷

Limitations

- If led by industry (e.g., through self-regulation) then it will likely be ineffective. Self-regulation in this area is “completely failing”²⁷⁸, due to a lack of accountability²⁷⁹ and tokenistic efforts that are easily bypassed (e.g., just 1 in 20 gambling and gambling-like logos are subject to the Premier League ban on front-of-shirt sponsorship).²⁸⁰
- This measure would do nothing to restrict those adding gambling logos to sports and gaming content post-stream (e.g., ‘Stake’ banners across viral content).
- Restrictions only being applied to a specific environments will mean that operators may upweight other environments that are also influential to CYP.
- Many sports and esports competitions transcend national borders, meaning those that originate in other countries could still easily be seen by CYP. This could be mitigated by requiring any brand with a licence within GB to abide by these conditions globally (which also has drawbacks of giving unregulated providers a larger share of voice).

6.8 Explore restrictions on specific online platforms

Potential targeted policy

- Ban the marketing of gambling on online channels most popular with children.

Rationale

- Some online channels are disproportionately used by children, enhancing the risk that large volumes of children will see gambling content. For example, over four in five children aged 13-17 use YouTube, WhatsApp and/or TikTok.²⁸¹
- Although many of these platforms have age verifications, the shareability of online content through interactions (e.g., likes, shares, comments)²⁸² means family or friends may inadvertently share gambling content onto the feeds of CYP or those experiencing harms. Similarly, algorithms on social media platforms amplify content that users tend to engage with,²⁸³ creating an echo chamber when CYP engage with gambling content.

²⁷⁶ What are the odds? The appeal of gambling adverts to children and young persons on twitter <https://www.bristol.ac.uk/policybristol/policy-briefings/what-are-the-odds/>

²⁷⁷ Ecstatic Partners With Gambling Blocking Software Gamban After Owner's Problem Gambling <https://www.esports.net/news/industry/ecstatic-partners-with-gambling-blocking-software-gamban-after-owners-problem-gambling/>

²⁷⁸ Gambling advertising: how is it regulated? <https://commonslibrary.parliament.uk/research-briefings/cbp-7428/>

²⁷⁹ Gambling marketing in Great Britain: What needs to change and why? <https://www.gambleaware.org/our-research/publication-library/articles/gambling-marketing-in-great-britain-what-needs-to-change-and-why/>

²⁸⁰ 5 Gambling, cryptocurrency, and financial trading app marketing in English Premier League football: A frequency analysis of in-game logos <https://akiournals.com/view/journals/2006/12/4/article-p972.xml>

²⁸¹ Children and parents: media use and attitudes report 2025

<https://www.ofcom.org.uk/media-use-and-attitudes/media-habits-children/children-and-parents-media-use-and-attitudes-report-2025>

²⁸² ADVERTISING ON EARNED MEDIA IN SOCIAL MEDIA: SYSTEMATIC LITERATURE REVIEW <https://transpublika.co.id/ojs/index.php/JEKOMBITAL/article/view/616>

²⁸³ An End to Junk Food Marketing Online: Policy Position <https://obesityhealthalliance.org.uk/wp-content/uploads/2020/11/Ending-junk-food-marketing-online-position-paper.pdf>

- There is public support for such measures, with nine in ten supporting a ban on gambling advertising on social media sites popular with children.²⁸⁴

Limitations

- Restrictions on only large platforms could mean operators pivot towards smaller platforms where protections (e.g., age verifications, parental controls) are less effective.
- It may be challenging to decide the threshold of children usage that should constitute a platform ban. Some platforms may have inherent appeal to children (e.g., Kick for gaming content) but may not reach the required threshold. Shifts in media consumption over time would also produce difficulties.
- Online environments transcend national borders, meaning content generated in other countries could still easily be seen by children.²⁸⁵

²⁸⁴ GambleAware Annual GB Treatment and Support Survey 2024. <https://www.gambleaware.org/our-research/publication-library/articles/annual-gb-treatment-and-support-survey-2024/>

²⁸⁵ What's next for WHO's global strategy to reduce the harmful use of alcohol? <https://pmc.ncbi.nlm.nih.gov/articles/PMC7047030/>